



# Housing Issues and Considerations for Adults with ID/DD in New Hampshire

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## **Disclaimer**

The content of this document is for informative purposes only and is not to be relied upon as a professional or legal opinion whatsoever.

## **Purpose**

A separate document, [Housing for Adults with ID/DD in New Hampshire](#), provides a description of housing solutions available to people with intellectual disabilities and developmental disabilities (ID/DD). This document is meant to accompany that separate document by providing a discussion of the issues. Together, these two documents are intended to help New Hampshire policy makers and advocates make informed decisions related to housing for people with disabilities.

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## Core Values: Inclusion and Choice

Inclusion is the practice or policy of providing equal access to opportunities and resources for people who might otherwise be excluded or marginalized, such as those who have physical or intellectual disabilities and members of other minority groups.

Inclusion is a core value of each of the issues described in this document. It also needs to be a component of any policy change and solution related to housing for people with disabilities.

Furthermore, there is no “one size fits all” solution for people with disabilities. Different people thrive in different environments based upon their support needs, hopes, and desires. As such, there must be a choice of different housing solutions for people with disabilities.

## Top Issues

The top issues related to housing for people with disabilities are: supply, protection from displacement, access, and sustainability.

### ***Supply***

The [2023 New Hampshire Statewide Housing Needs Assessment](#), which was conducted by [Root Policy Research](#) on behalf of [New Hampshire Housing](#), provides the following statistics for housing in general:

- Residents with disabilities are twice as likely as New Hampshire households overall to be living in housing units that are in substandard condition.
- Rents and home price increases outpaced wage growth. Between 2000 and 2020, New Hampshire’s home values rose by 111% and rents rose 94%, while the median income of a New Hampshire household increased by 73%.
- The state’s 2022 rental vacancy survey reported an overall rental vacancy rate of 0.5%, far too low to support a functional market.
- The state’s lowest income renters are most adversely affected by the tight rental market, and there are 23,500 too few affordable rental units or rental assistance vouchers for the state’s extremely to very low income renters.
- In addition to the 23,500 units needed to stabilize the housing supply, New Hampshire needs almost 60,000 units between 2020-2030 and 90,000 units between 2020-2040.
- If only 10% of the state’s very low income (<50% Area Median Income, or AMI) renters were looking to move — about 7,400 renters — they would only have about 350 units to choose from. The likelihood that they would find an affordable, vacant unit is about 5%.

To illustrate the high cost of rent, the [NH Payment Standards](#) used for the [Housing Choice Voucher Program](#) (Section 8), shows monthly rents over \$1,600 for Manchester, Nashua, and Milford, and up to \$2,139 for Seabrook.

Note that Medicaid dollars cannot be used to cover any room and board or housing expenses.

People with disabilities may have no sources of income or may be reliant upon Supplemental Security Income<sup>1</sup> (SSI) and other forms of government support. Even when SSI is combined with options such as the Housing Choice Voucher Program, people with disabilities still may not be able to afford a place to live.

As an example, data from the Technical Assistance Collaborative's [Priced Out](#) website shows that in 2024, a person with a disability received SSI benefits equal to \$970.00 per month. Statewide, this income was equal to 12.90% of the area median income. Given this, a person with a disability receiving SSI would have to pay 123% of their monthly income to rent an efficiency unit or 136% of their monthly income for a one-bedroom unit, leaving no money for food, transportation, clothing, or other necessities.

Furthermore, the issue of supply is not tied solely to cost. When considering the issue of supply for people with disabilities, the following need to be taken into account:

- **Accessibility** - People with disabilities require housing that supports their unique needs. Examples include wheelchair access, room for medical equipment, etc.
- **Inclusion** - Increasing the availability of accessible and affordable square footage is critical, but just as critical is that the housing provides equal access to opportunities and resources in the individual's community.

## ***Protection from Displacement***

In the past, society considered people with disabilities as a population that could be categorized as a single group. This led to the development of institutions such as the now-closed Laconia State School<sup>2</sup> where people with disabilities were displaced from their community and sent to the institution.

The lessons learned from Laconia State School include the understanding that categorizing people with disabilities into a single group is flawed. People with disabilities are just as diverse as people without disabilities: they have differing interests, desires, and needs that cannot be clumped into a single category. Furthermore, as with anyone, people with disabilities can form meaningful relationships with all members of our society regardless of race, religion, gender, age, ability, and so on.

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<sup>1</sup> <https://www.ssa.gov/ssi/eligibility>

<sup>2</sup> Watch "[Lost In Laconia](#)" on YouTube

Given this, housing solutions for people with disabilities should not require someone to move away from their community, but should instead support full participation in society. Furthermore, this not only needs to be a short term goal, but also something sustainable and stable for the long term.

## **Access**

Access encompasses several facets of housing, including the following:

- **Physical access** - a fundamental goal for housing is universal design<sup>3</sup>, which is the design of products and environments to be usable by all people, to the greatest extent possible.
- **Access to care providers** - a number of people with disabilities, especially those with developmental disabilities, intellectual disabilities, and acquired brain disorders, require support from care providers. These care providers often have very low income, making it difficult to attract and retain workers. Furthermore, their low income also results in the workers themselves being impacted by the housing crisis.
- **Access to public transportation and the community** - public transportation enables an individual to go to their job, visit with their friends, go to church, go grocery shopping, go to the library, go to events in the community, etc. In other words, access to public transportation can help enable both independence and inclusion. Similarly, care providers may also rely upon public transportation.

## **Sustainability**

When developing housing solutions, one not only needs to take into account the up front capital needed to obtain the housing, but one also needs to plan for long term sustainability, stability, and resiliency.

For example, consider the gift of a home. What happens when the home needs maintenance? Who pays the property taxes and utilities? Where does money for food and clothing come from? What happens if a care provider unexpectedly becomes unavailable?

As another example, assume the individual has obtained housing through the Housing Choice Voucher program. With the Housing Choice Voucher Program, the landlord must provide decent, safe, and sanitary housing to a tenant at a reasonable rent. If the landlord becomes financially unviable, there needs to be a plan to ensure the individual has housing; displacing them and putting them on a waiting list will result in homelessness.

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<sup>3</sup> <https://drcnh.org/rap-sheet/universal-design-resource-list/>

## Additional Sources of Information

The following are additional sources of information:

- [New Hampshire Disability Statistics](#), previously known as “Facts & Figures”, is an annual publication of the Institute on Disability (IOD) at the University of New Hampshire.
- The University of Kansas [State of the States](#), which provides state profiles for ID/DD spending. The data comes through partnership with state agencies on developmental disability services and/or the state Medicaid authorized agency.
- The [Spring 2022 Edition of RAPP](#)<sup>4</sup> focuses on disability and housing. RAPP – Disability Research, Advocacy, Policy, and Practice – is a joint collaboration between the Disability Rights Center-NH, UNH Institute on Disability, and the NH Council on Developmental Disabilities.
- [5 Key Questions about Support for People with IDD](#), published by the [Institute on Community Integration](#) at the University of Minnesota, provides useful statistics on key areas for housing for people with ID/DD.
- The [Governor's Commission on Disability's Final Report](#) from February 2020 touches on housing options starting on page 33, including a recommendation for an RFA to look at a system improvement design for housing and housing models.
- The New Hampshire [Council on Housing Stability 2021–2024 Strategic Plan](#) contains a broad overview of the housing crisis along with a one year action plan and three year strategic plan. Page 16 of the plan mentions a 1915i State Plan amendment for a Supportive Services Benefit under the Medicaid State Plan. The amendment is intended to *“support 253 individuals the first year, increasing to 315 in year 2 and 447 in year 3 to provide assistance to obtain and maintain housing people with disabilities who are experiencing chronic homelessness, transitioning out of an institutional setting and can live in the community with these services.”*

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<sup>4</sup> <https://drcnh.wpenginepowered.com/wp-content/uploads/2022/05/2022-DRAPP-SpringF.pdf>

## **Recommendations to Consider**

The following are areas to consider investigating as a means to begin addressing the housing crisis for people with ID/DD.

### ***Representation on the State Council on Housing Stability***

New Hampshire RSA [Chapter 4-H](#) established the State Council on Housing Stability ([NHCHS](#)) for the purpose of implementing the plan to create housing stability for all citizens of the state of New Hampshire.

While the Department of Health and Human Services ([DHHS](#)) is listed as a council member in [4-H:2](#)<sup>5</sup>, DHHS covers a very large population. Because of the unique needs of the ID/DD population, there should be specific representation for people with ID/DD. For example, the Bureau of Developmental Services ([BDS](#)) or the [Developmental Services Quality Council](#), or both, should have a representative on the council to provide input from the unique perspective of people with ID/DD.

Furthermore, the State Council on Housing Stability should be included in all recommendations made in this document.

### ***Educate General Public***

Educating the general public about housing for people with ID/DD can help in a couple ways: 1) supporting housing in their “back yard”, and 2) perhaps encouraging more people to become enhanced family care providers<sup>6</sup>.

With respect to NIMBY (not in my back yard), residents sometimes oppose welcoming people with ID/DD into their communities based upon incorrect assumptions about what it means and what the impact will be (as an aside, these assumptions are frequently the result of the lack of inclusion). A campaign to describe how people with ID/DD can become your friends and neighbors may help eliminate the negative assumptions.

An additional education campaign directed towards local government (e.g., planning boards, zoning boards, etc.) may also help lower the barrier to supporting housing in the community.

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<sup>5</sup> See page 6 of [Council on Housing Stability 2021–2024 Strategic Plan](#) for a list of all council members

<sup>6</sup> See the “Enhanced Family Care” section of [Housing for Adults with ID/DD in New Hampshire](#)

With respect to enhanced family care, people who are capable of being family care providers either may not know it is a possibility or they may assume it will be too much work. A campaign to describe what it means to be an enhanced family care provider – including respite – may help attract more qualified enhanced family care providers.

## ***Ensure Housing Units Can Support the ID/DD Population***

[New Hampshire Disability Statistics](#)<sup>7</sup> shows that about 12.1% of the population (166,073 people) in New Hampshire have a disability. Furthermore, the University of Kansas [State of the States](#) report provides the following NH statistics for 2021:

- There were 2,698 people with ID/DD living in NH.
- 2,340 were living in “Other Residential” settings, which may mean living with a family member, living with an enhanced family care provider, etc.
- 18% of people with ID/DD were living alone or with a roommate
- 73% of people with ID/DD were living with a family caregiver
- 27% of caregivers were Age 60+
- 35% of caregivers were Age 41-59

An examination of these numbers may indicate that a high percentage of people with ID/DD are at risk due to an aging population of caregivers that will no longer be able to provide care in the future.

A study should be done to understand what might be done to ensure that the percentage of appropriate housing units remains in line with the needs of the ID/DD population.

For example, one might consider consulting with the [Area Agencies](#) and the [New Hampshire Private Provider Network](#) to determine what solutions are currently being used, what solutions are needed, and what the future projections may be for both people with ID/DD and the associated workforce of caregivers. Note that the study should keep “choice” in mind and it is expected that the results will differ by geographic region.

Furthermore, also note that individuals with ID/DD may not require a housing unit with universal design, but they may have other considerations such as those listed in the “Housing Considerations” section of [Housing for Adults with ID/DD in New Hampshire](#).

The output of the study may inform policy that may guide requirements for the availability of units that support universal design in a proposed apartment complex, for example.

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<sup>7</sup> <https://iod.unh.edu/new-hampshire-disability-statistics>



## ***Support Room and Board Expenses***

Medicaid dollars cannot be used to cover any room and board or housing expenses. Some support is provided by other means, such as those discussed in the “Additional Sources of Funding” section of [Housing for Adults with ID/DD in New Hampshire](#).

Because of the high cost of housing, however, an individual’s SSI, housing choice voucher, and additional sources of funding cannot cover the overall cost of living. Without complete funding for the cost of living, provider agencies are questioning whether to move forward with planned and future housing development.

A study should be done to determine how to address the gap between the cost of the housing itself and the cost of other living expenses.

## ***Study Certification, Licensure, Zoning, and Regulations***

As people work on solutions such as developing supportive housing for people with ID/DD, they find lack of clarity in what is required by the local, state, and federal governments. For example, some requirements appear to imply that a supportive housing solution needs to meet the same stringent requirements as a licensed medical residence. This would force excessive/unnecessary constraints on features such as bathrooms, for example.

There are a number of regulations, statutes, and administrative rules that have been created to encourage and reduce the complexity of housing other populations, such as for adults and the elderly (e.g., [RSA 354-A:15](#) and [He-P 813](#)) and the workforce (e.g., [RSA 674:58-61](#)). A study should be done to see if the elements of these statutes – and other similar regulations – might be extended to include people with ID/DD to reduce unnecessary constraints.

Related to certification, licensure, zoning, and regulations, it may also be beneficial to study and support the notion of pre-approved designs for housing such as ADUs and Supportive Living. These pre-approved designs may help reduce the expense of creating plans that meet complex building codes and zoning requirements.

## ***Incentivize the Availability and Development of Appropriate Housing***

The “Incentives for Developers and Property Owners” appendix of [Housing for Adults with ID/DD in New Hampshire](#) outlines several incentives for developers to create affordable housing, including the New Hampshire Housing [Multifamily Supportive Housing Financing Program](#).

If it was successful, continuing the Multifamily Supportive Housing Financing Program should be considered. If it was not successful, a study should be conducted to understand why.

Furthermore, a study should be conducted to incentivize the availability of any of the choices listed in the “Housing Choices” section of [Housing for Adults with ID/DD in New Hampshire](#), including housing for the workforce who provide care.

Some of these choices may be incentivized through funding, but there may also be policy changes that could lower the barriers to entry. For example, enabling families to more easily add accessory dwelling units (ADUs) that can house an individual and a care provider might allow for the expansion of appropriate housing that is both inclusive and resilient.

Note that increasing availability may also include expanding Enhanced Family Care, but the incentivization needs to ensure care providers are committed to providing the companionship and care that meet the needs of the individual.

### ***Create Plain Language Information***

[Housing for Adults with ID/DD in New Hampshire](#) describes a wide variety of housing choices, but each can be very difficult to navigate. Families and individuals need step-by-step instructions written in plain language as well as human guidance to help them both understand their options and work through the process.

This guidance may take several forms and might be driven through [BDS](#) and/or [NH Housing](#). Delivery of the information might build on top of the ID/DD service delivery system, including the following:

- Developing and maintaining plain language information online. This information should describe housing choices, provide guidance for applying, and describe what is required to remain qualified once a person’s housing solution has been found.
- Providing a “hotline” for families to learn more about choices as well as resolve issues they may have with their current housing choice.
- Educating area agency service coordination staff about housing choices. This will enable service coordinators to provide more personalized support to the families and clients they work with.
- Providing guidance to developers/organizations wishing to create housing solutions for people with ID/DD. Sometimes these organizations may be a group of families who not only need help navigating the paperwork and understanding what is already available, but also need to be informed of the requirements needed to maintain housing solutions for the long term.
- Providing a feedback mechanism for families, individuals, support staff, developers, etc., to suggest improvements.

## ***Establish Metrics and Key Performance Indicators***

Metrics and key performance indicators should be established to measure the effectiveness of the solutions put in place to house people with ID/DD. This should not be a “one and done” activity, but should instead become an integral part of the system with a goal of continual improvement.

The metrics may include the number of people housed, number of people waiting for housing, wait times for housing, types of housing choices used, demographics, geographic location, cost, and perhaps periodic satisfaction surveys targeted to individuals, families, support staff, service coordinators, and others involved in housing people with ID/DD.