October 9, 2020

Texas Department of Housing and Community Affairs  
Attn: Matthew Griego, QAP Public Comment  
P.O. Box 13941  
Austin, TX 78711  
htc.publiccomment@tdhca.state.tx.us

Dear TDHCA Governing Board:

I am writing to express concerns regarding the proposed supportive housing qualifications in the Texas Department of Housing and Affairs 2021 QAP, 10 TAC 11.1(d)(122)(B).

NAMI Texas is a nonprofit 501(c)3 organization founded by volunteers in 1984. We are part of the nation’s largest grassroots mental health organizations and we exist to help improve the quality of life for individuals with mental illness and their families. Around the state, we have 27 local NAMI affiliate organizations and approximately 2,000 members.

The proposed changes will curtail the ability of individuals with criminal backgrounds due to mental health disabilities to find stable housing. People with disabilities are a protected class under the Fair Housing Act (FHA). The changes will hinder the recovery of those whose convictions stemmed from disabilities by making it harder for supportive housing providers to secure funding.

Approximately 40% of prisoners and jail inmates have experienced mental illness. The physical and psychological consequences of imprisonment often worsen mental health, prolong sentences, and increase rates of homelessness, emergency service utilization, substance use, and recidivism upon prison or jail exit. Supportive housing programs are essential for improving community functioning of individuals with serious mental illness experiencing housing instability or homelessness.

Structural barriers in obtaining personal identification, housing, transportation, and employment exacerbate disparities in the receipt of mental health and substance use services. Improving access and availability of stable housing for individuals with serious mental illness provides opportunities for recovery and reduces the costs associated with the utilization of crisis and emergency services.

Stable housing and support services are instrumental in maintaining recovery for individuals with mental illness or substance use disorders exiting the criminal justice system. Mental illness can contribute to the onset and chronicity of housing instability and homelessness. Excluding individuals living with mental illness that do not meet the proposed requirements for supportive housing may not be able to maintain social, occupational, or treatment services. Furthermore, the proposed changes are inconsistent with Governor Abbott’s support to address chronic homelessness. Ensuring access to supportive housing is imperative for recovery among individuals with a mental health condition with prior justice involvement, and already experience social, economic, financial, housing, and structural barriers that impede recovery.

Respectfully,

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