



**COMMONWEALTH of VIRGINIA**  
***Virginia Board for People with Disabilities***

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January 29, 2010

James W. Stewart III, Acting Commissioner  
Department of Behavioral Healthcare and Developmental Services  
13<sup>th</sup> Floor, Jefferson Bldg.  
1220 Bank Street  
Richmond, Virginia 23219

Re: Policy 4023 (CSB) 86-24, *Residential Services*

Dear Jim:

The Virginia Board for People with Disabilities (the Board) appreciates this opportunity to provide public comment on a policy under consideration for update, revision or rescission: Policy 4023 (CSB) 86-24, *Residential Services*. For these and any other future policy updates/revisions, we applaud and support DBHDS' efforts to make editorial changes that incorporate language reflecting person-centered principles and promote community integration, inclusion and participation for individuals with developmental and other disabilities.

We are aware from draft minutes of the State Board for BHDS (draft, December 8, 2009) available on your website that the Policy and Evaluation Committee has recommended rescinding this policy and using some of the current text as the basis for a new Housing policy. The Board supports that recommendation. The *Report on Investment Models and Best Practices for the Development of Affordable and Accessible Community-based Housing* (Item 315 Z) provides a strong foundation for the new policy. We provide the following suggestions regarding revision of this policy for consideration in the future version.

- The Mission Statement of the current policy is excellent. It clearly articulates a vision consistent with the Developmental Disabilities and Bill of Rights Act of 2000.
- Since this policy was last revised, new housing options have been developed and implemented successfully by other states. Equally, if not more, important, individuals with developmental and other disabilities increasingly have voiced their desire for greater opportunities for community integration, inclusion and participation; and for residence, these desires require having affordable, accessible and independent housing.

***Providing a VOICE for Virginians with Disabilities***

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- To reflect the current needs of individuals with developmental disabilities, consider adding language in the section, *Policy for the Department, Facilities and CSBs as follows*:
  - It is the policy of DBHDS that housing development not be tied to services, as it has historically been. When housing and support services are bundled together, individuals are vulnerable to funding changes and other pressures affecting the agency providing support. In addition, when housing and services are bundled, individuals with disabilities are not free to change service providers when or if they are dissatisfied with the services being received. Individuals with disabilities have must have stable homes and the ability to fully exercise their right to choose the agencies and personnel who enter their homes to provide supports and services.
  - It is the policy of the Department to work collaboratively with the Virginia Housing Development Authority and Virginia Department for Housing and Community Development to develop, implement and monitor a state strategic investment plan for the development of, and subsidy for, affordable and accessible housing options for individuals with mental illness, intellectual and other developmental disabilities, or alcohol and other drug addictions.

We hope that this is helpful to you. The Board welcomes the opportunity to continue our collaboration to effectively address the housing needs for individuals with developmental and other disabilities.

Sincerely,



Heidi L. Lawyer

Cc: Ruth Anne Walker, Director, Legislative Affairs  
Charline Davidson, Director, Office of Planning and Development