



# State of South Carolina

## Department of Mental Health

### MENTAL HEALTH COMMISSION:

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**Robert Bank, MD**  
Acting State Director

August 24, 2023

Kim Wilbourne, LIHTC Manager  
SC State Housing Finance and Development Authority  
300-C Outlet Pointe Blvd.  
Columbia, SC 29210

Dear Ms. Wilbourne:

Thank you for the opportunity to provide comments for the 2024 Qualified Allocation Plan (QAP).

The South Carolina Department of Mental Health (SCDMH) appreciates SC Housing's support in expanding the number of permanent supportive housing units available to people with disabilities, specifically those with serious mental illness. The Supportive Housing scoring criterion in the 2021 and 2022 QAPs will produce 186 new units for persons with disabilities across the state. These units will be affordable for households at 20% of Area Median Income (AMI), which includes those with Social Security disability benefits as their sole source of income. According to the Social Security Administration, as of December 2021, there are 69,922 people with disabilities ages 18-64 in South Carolina receiving Supplemental Security Income (SSI).

According to Technical Assistance Collaborative (TAC)'s publication *Priced Out*, in 2022 in South Carolina, a person with a disability receiving SSI would have had to pay 98% of their monthly income to rent an efficiency unit and 103% of their monthly income for a one-bedroom unit. Lacking access to affordable housing, many people with disabilities can be forced into costly and segregated adult care homes, nursing facilities or state hospitals — or into homelessness.

As you know, SCDMH has contracted with TAC and is currently developing a draft tenant referral process referenced in the 2021 and 2022 QAPs. This draft referral process will soon be shared with SC Housing for review and approval. SCDMH looks forward to working with SC Housing to finalize and implement this new tenant referral process that will expand the number of affordable rental units available to SCDMH patients.

This will be especially important as we respond to a recent Department of Justice (DOJ) report ([2023.05.05 South Carolina ADA Findings Report \(justice.gov\)](#)) that, in part, concluded that the State of South Carolina should expand permanent supportive housing options in integrated settings to prevent unnecessary institutionalization of adults with mental illness.

SCDMH supports the continuation of the Supportive Housing scoring criterion to further increase the availability of permanent supportive housing units that meet the need for affordable housing for people with disabilities at 20% AMI across the state.

Please contact me for further information.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert L. Bank". The signature is fluid and cursive, with a long horizontal stroke at the end.

Robert L. Bank, MD  
Acting State Director

cc: Elizabeth Hutto, General Counsel  
Michele Murff