

Expanding the Capacity of CDFIs to Serve People with Disabilities

The CDFI Fund's Capacity Building Initiative



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**University of
New Hampshire**

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Module 1 – The Role of CDFIs in The Disability Market

Course Overview

This chapter reviews the organizational boundaries – mandated by federal and state policy – that have governed organizations providing services to people with disabilities. It compares these boundaries to those of CDFIs and other community development organizations that have not been active in the disability community. This comparison serves to highlight opportunities for CDFIs to better serve people with disabilities through improved coordination and collaboration across all service providers. Finally, case studies are provided to demonstrate what is possible when CDFIs invest in the disability community.

This Chapter Presents

- System Stratification
- Characteristics of the Disability Market
- Opportunities for CDFIs to Include People with Disabilities
- Social Impact Measures
- Case Studies of CDFI Investments in the Disability Community

Systems Stratification/Bifurcation

Major socio-economic disparities between people with disabilities and the general population continue to persist in education, employment, poverty, and financial services. Given the breadth and depth of CDFI financial offerings, more targeted and deliberate CDFI involvement has the potential to mitigate these disparities and improve overall coordination and collaboration among agencies that provide supports and services to people with disabilities.

There are networks of community-based organizations that qualify as support and service providers such as: (1) service providers who support direct human services of people with intellectual and developmental disabilities; (2) community mental health centers who support children and adults with mental and behavioral health needs; (3) employment, community, and independent living centers; (4) Aging and Disability Resource Centers (ADRC) that support older adults and caregivers; and (5) Vocational Rehabilitation (VR) and Community Rehabilitation Programs (CRP) that support persons with disabilities with employment and training programs. These support and service providers promote self-advocacy efforts, personal care assistance, and capacity building for individuals to live life on their own terms.

People with disabilities and the organizations that support them depend on market systems as well as public sentiment for inclusion in neighborhood schools, the labor market, and affordable, accessible, inclusive housing. However, organizations specializing in services for people with disabilities are typically not the same as organizations specializing in the development of inclusive

housing properties, community facilities (built for the broader community), business enterprises or community banking institutions.

To address the inequities of opportunity and barriers to social and economic inclusion of persons with disabilities, a more comprehensive approach must incorporate principles of self-determination, as well as economic development practices that align with resources found in disability policy. All three, used in combination, could affect positive changes in the market system and social attitudes as it relates to persons with disabilities.

Characteristics of the Disability Market

How is the “Disability Market” Measured?

Statistical information concerning disabilities is collected through several different venues. The American Community Survey (ACS), Cornell University’s Disability Status Report, and the University of Colorado’s Coleman Institute for Cognitive Disabilities are a few of the sources.

The ACS, working with the U.S. Census Bureau and the U.S. Department of Commerce, samples close to three million homes a year. The ACS generally defines a disability as a “long-lasting physical, mental, or emotional condition.” Working from information and data collected from the ACS, the 2017 Cornell Disability Status Report reported 12.7% of the U.S. population as individuals with “any disability” with the following breakdowns into six separate categories: visual (2.3%), hearing (3.6%), ambulatory (6.9%), cognitive (5.1%), self-care (2.6%), and independent living (5.6%).

Whereas the ACS provides statistics for various disabilities, the Coleman Institute for Cognitive Disabilities focuses on “mental retardation and developmental disabilities, acquired brain injury, Alzheimer’s disease, and severe and persistent mental illness” (Braddock). The Coleman Institute’s mission is “to catalyze and integrate advances in science, engineering, and technology to promote the quality of life and independent living of over 20 million American citizens (7% of the U.S. population) living with cognitive disabilities.” Since 1991, the Coleman Institute has gathered information and undertaken data analysis related to cognitive disabilities. Although the distribution of statistics is not the Institute’s main function, it willingly shares the useful information it has acquired.

How Big is the Market?

Data from the ACS, Cornell University’s Disability Status Report, and the Coleman Institute, as well as other sources, clearly demonstrate that the number of individuals with disabilities is significant. The following data and reports further demonstrate that the number is also growing:

- **Wounded Veterans of Iraq and Afghanistan** – According to a published report from the John F. Kennedy School of Public Policy at Harvard, of the 1.4 million men and women deployed to Iraq and Afghanistan, nearly one-half will need medical attention from the Veterans Administration (VA) when they return. In addition, due to medical advances, the

ratio of wounded soldiers to fatalities is four to eight times higher than in any previous conflict (Blimes, 2007).

- **Autism** – According to the U.S. Centers for Disease and Control (CDC)’s September 2019 Data & Statistics on Autism Spectrum Disorder, about 1 in 59 children has been identified with autism spectrum disorder (ASD). This is a stark contrast to the CDC’s year 2000 analysis which estimated 1 in every 150 children had the disorder.
- **Baby Boomers** – In the next 10 years, the major wave of baby boomers will be entering their seventies (Friedman, 2009). It is estimated that the current senior population of 34 million will double over the next 20 years. What do these statistics have to do with disabilities? In 2007, 25 percent of Americans between the ages of 65 and 74 reported one or more disabilities, and 50 percent of Americans age 75 and older reported one or more disabilities (Bjelland, Erickson, and Lee, 2008).
- **Worst-Case Housing** – The U.S. Department of Housing and Urban Development (HUD) defines worst case housing needs as “renters with very low incomes— no more than 50 percent of the Area Median Income (AMI)—who do not receive government housing assistance and who pay more than one-half of their income for rent, live in severely inadequate conditions, or both.” Based upon findings reported in HUD’s 2017 Worst Case Housing Needs Report to Congress, as of 2015, 8.30 million American households had worst case needs, up from 7.72 million in 2013 and approaching the record high of 8.48 million in 2011.

A substantial percentage of individuals living with disabilities are considered “hidden” and are excluded from these statistics and analyses. Many of these men and women are living with aging parents, even though they may be able to reside on their own or qualified to reside within supported living programs.

People with Disabilities Living in Poverty

Many people with disabilities live in poverty, and although many receive public support, the assistance is not sufficient to raise their incomes above the poverty rate. Cornell University reports that there are 22 million people between the ages of 16 and 64 in the United States with one or more disabilities (Cornell 2007). The Bureau of Labor Statistics reported that in December 2009, 18.6 percent of working-age individuals with disabilities were employed, compared to 63.3 percent of persons with no disability. The U.S. Census Bureau reports that those who do work typically earn

about \$7,000 less per year than workers with no disability. The annual income of households with a wage earner who has a disability is \$26,500 less than households without a person with a disability (Cornell 2007). Moreover, researchers found that 24.7 percent of working-age Americans with disabilities lived in poverty compared to 9.0 percent of those without disabilities (Bjelland, Erickson, and Lee, 2008).

These dramatic discrepancies are long-standing and continue to separate Americans with disabilities from their peers without disabilities. Individuals who do not or cannot work experience even greater economic challenges. According to the U.S. Social Security Administration's 2017 facts and figures, "5.5 million people were newly awarded Social Security benefits in 2016. 62% of aged beneficiaries received at least half of their income from Social Security in 2015. 55% of adult Social Security beneficiaries in 2016 were women. 54.2 was the average age of disabled-worker beneficiaries in 2016." The agency reports that "at the beginning of 2019, Social Security paid an average monthly disability benefit of about \$1,234 to all disabled workers (which) is barely enough to keep a beneficiary above the 2018 poverty level (\$12,140 annually)."

In addition to receiving public transfer payments that are far below Median Household Incomes in every state, individuals with disabilities must restrict their assets to qualify for these benefits. They cannot accumulate any more than \$2,000 in assets other than their house, car, and a life insurance policy (capped at \$1,500). Ultimately, these programs contribute to keeping people with disabilities in poverty. This policy is based on the old notion that individuals with disabilities are unable to work and, therefore, must rely on others (such as family members) for support.

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Opportunities for CDFIs to Include People with Disabilities

CDFIs provide any number of products and services in the community to affect positive change for people and places overlooked by traditional financial markets. Detailed below are CDFI product specializations that represent opportunities for CDFIs to serve people with disabilities. For each product, examples are provided regarding the ways in which CDFIs can play a role and the resources that can be tapped or leveraged within disability policy to help achieve the development aim.

Affordable Housing

CDFIs providing affordable housing loans must understand how developers can incorporate features that benefit people with disabilities. This can be included in underwriting the project. With an understanding of the capital stack to develop an affordable housing project, CDFIs can be creative in providing optimum financing of the development. Additionally, CDFIs have the opportunity to promote and influence housing that benefits this population.

Similar to income support programs, housing resources are provided through a combination of federal, state, county, and non-profit/private organizations. Low-income families and people with disabilities are likely to enter the same door in applying for housing assistance. Typical pathways for housing access include Public Housing Authorities (PHA), which determine eligibility for public housing, Section 8 vouchers, and Section 811 supportive housing for persons with disabilities. These agencies are charged with developing and managing a mix of housing developments for low-income families and ensuring that residents in the dwellings comply with federal, state and other regulations that govern the housing use.

Access to subsidized housing through existing, traditional networks for low-income families largely depends on the characteristics of the person with disabilities. The availability of housing options largely depends on place. Although low-income status is a characteristic shared in common among people that benefit from CDFIs, non-profit and government services that support low-income persons with disabilities, as compared to low-income families, have historically been different

provider organizations within communities. In other cases, disability service organizations assist people with disabilities in securing host families. Individuals are therefore housed with families and the services and support they receive through family care situations are reimbursed via Medicaid.

Commercial Real Estate/Business/Workforce Development

Local business enterprises require various forms of capital to operate. Capital may be needed for any number of needs including stocks, inventory, real estate, or cash flow to finance operations at various stages of development. CDFIs that lend to community businesses may wish to promote the workforce development of people with disabilities. As such, several resources exist within disability policy and other related funding mechanisms to assist in offsetting costs related to training and accommodations. Some examples are listed below:

Vocational Rehabilitation Services

Vocational Rehabilitation (VR) is a quasi-state government agency that is responsible for providing employment services to people with disabilities under the Federal Rehabilitation Act of 1973. It provides employment-related services to youth and young adults and adults with disabilities. VR purchases services on behalf of the customers it serves and extends funding to qualified CDFIs and other employers seeking to include its customers in workforce development efforts. Examples of possible options include assistance with tuition and credential attainment, on-the-job training agreements, employment consultation services on accommodation issues, and more. The services VR provides are according to an Individualized Plan for Employment (IPE) and other pre-vocational services that are sponsored by VR. The need for support must be aligned with VR customer needs according to their regulatory framework. For a listing of state VR agencies and satellite offices, visit: <https://askjan.org/concerns/State-Vocational-Rehabilitation-Agencies.cfm>

Ticket to Work

Adults with disabilities ages 18-64 that are eligible for Social Security Disability Insurance (SSDI) or Supplemental Security Income (SSI) are also eligible to participate in a work incentive available through the Social Security Administration called the Ticket to Work (Ticket) program. Through this program, beneficiaries can access employment services available from the Vocational Rehabilitation (VR) entity in their state, which provides certified Vocational Rehabilitation Counselors to support people with disabilities in obtaining competitive, integrated, gainful employment. VR services discontinue once a customer's goal is met. A Ticket to Work acts somewhat like a voucher to receive employment services that relate to an employment goal. Eligible beneficiaries have the option to choose their employment services provider. It could be from VR or from other authorized Employment Networks (EN). Common ENs include VR agencies and U.S. Department of Labor (DOL) America's Jobs Centers but also include other authorized ENs that provide specialized services or specialize in certain types of customers seeking employment.

Once a Ticket is assigned to an authorized EN, the ticket reimburses the EN for the services rendered over time based on successful employment outcomes and/or milestone payments for progress made on the employment goal. For more information, visit: <https://www.ssa.gov/work/>

Partnership Plus

Partnership Plus is a combination of services available through VR agencies and use of the Ticket from Employment Networks. Because VR is a short-term service, the Ticket can supplement the traditional services provided through VR. For example, the Ticket can be used to help ensure longer-term supports from the Employment Network that an individual may need in order to be hired, remain successfully employed, advance within a company, or traverse a career ladder. Services may include benefits counseling, education and training, job coaching, job retention-related services such as transportation, and more. The range of services available vary by Employment Network. For more information, visit: <https://choosework.ssa.gov/library/partnership-plus>

American Job Centers – Individual Training Accounts

American Job Centers (AJC), administered through the U.S. Department of Labor (DOL), implement mandated employment-related services according to the Workforce Investment Act (WIA) and the Workforce Innovation and Opportunities Act (WIOA) of 2014. Services are available for people with and without disabilities and include training referrals, career counseling, and other employment-related services. In some cases, an individual may be eligible for an Individual Training Account (ITA), which is essentially a voucher given to an AJC customer in need of occupational skills training to become gainfully employed or re-employed (certain eligibility guidelines apply). For more information, visit: https://wdr.doleta.gov/directives/attach/TEGL/TEGL_19-16_acc.pdf

Impairment-Related Work Expenses

Impairment-Related Work Expenses (IRWEs) are what people with disabilities pay for special disability-related goods or services they need to work. They are direct costs that people with disabilities eligible for SSDI or SSI pay out of pocket for goods or services needed for employment. This is a source of revenue to a service provider and paid from the earned wages of workers with disabilities for the good or service. A good example is the cost of transportation to and from home by either a co-worker or accessible public transportation. The out-of-pocket expenses are deducted from the gross earned income in order to determine whether the employment is considered Substantial Gainful Activity (SGA). If the worker is eligible for SSI, the expenses paid may offset what is considered gross countable income and will be used to calculate the new amount of the SSI cash benefit. IRWEs are only deducted when:

- The good or service is needed because it enables employment;
- The service is needed due to physical or mental impairment;
- The items are not otherwise reimbursable by another source; and
- The cost is reasonable.

For more information about IRWEs, visits the Social Security Red Book at:
<https://www.ssa.gov/redbook/documents/TheRedBook2018.pdf>

State and County Tax Credit Programs

Tax credits and incentives for business enterprises are commonly used to entice investment in underserved communities and for marginalized workers. Check with your state and county government to learn more about the tax instruments that may qualify to help CDFIs in supporting people with disabilities to become a part of the labor force.

HRSA Workforce Development Grants

Several federal agencies have incentives for institutions of higher education (IHE) to promote health and other occupational professionals based on current or estimated workforce shortages. One example is the Health Resources and Services Administration (HRSA), which offers Behavioral Health Workforce Education and Training grants. These grants provide some operating support for college campuses, but the majority of the funding is made available to disadvantaged students for the costs of tuition, books and fees related to their education. For more information, visit: <https://bhw.hrsa.gov/fundingopportunities/?id=67ee4161-1b08-433d-8224-d1e009af2663>

Community Reinvestment Act

To the extent that CDFIs work with banking institutions regulated by the Community Reinvestment Act (CRA), workforce development for persons with disabilities qualifies as form of CRA credit. For more information, visit: <https://www.philadelphiafed.org/-/media/egmp/images/publications/banks-community-reinvestment-act-opportunities/banks-community-reinvestment-act-opportunities.pdf?la=en>

For More Information

This is only a partial list of resources that may be used independently or collectively to promote workforce development pathways for persons with disabilities working in local businesses. The following partners are recommended stakeholders to learn more about how these resources may be used in your area: Vocational Rehabilitation, American Job Centers, Work Incentive Counselors, and Institutions of Higher Education (community colleges, land grant universities, and private colleges and trade schools).

Community Facilities

Agencies that support people with disabilities are like any other organization in that they require a space for personnel to work with individuals and families they support. Thus, these organizations may need finance products to meet their non-profit capital improvement needs. However, based on the spirit of inclusion, the question is: How can CDFIs promote universal access that benefits the whole community rather than focusing exclusively on a special population? In other words, instead of financing a community facility that is exclusive to the needs of a specific group, how can a CDFI increase its impact such that it benefits everyone? Good examples of such development include local business incubators, a Makerspace, community cooperatives, recreation centers, childcare facilities, education and training centers, and arts centers. These sorts of investments can be financed and

intentionally designed with universal access and community building such that all residents are welcome, while reducing programmatic and physical barriers to access.

In-kind support for creating inclusive community facilities in the form of subject matter expertise in areas such as universal design, accommodations, accessible programming, and social media considerations, may be available through a local disability partner. Person-specific supports and services funded through human services resources may assist with direct support or personal assistance that individuals with disabilities may need in order to participate. Funds in the form of member dues, training fees, registration fees or supplies costs may be funded through individual budgets, ABLE accounts or personal sources of income and savings. Self-advocates could contribute on community facility governance boards or committees representing the disability community. Increasing access to social connections is critical to the health and wellbeing of community residents, and an important protective factor that promotes resilience. Financing community facilities in a way that intentionally includes people with disabilities is a way to improve social connections in the community.

Consumer Financial Products

A recent study conducted using the FDIC Survey on Un-banked and Under-banked Households concluded that in a nationally representative sample, people with disabilities are more likely to be un-banked or under-banked, less likely to have money to deposit into a savings account, lack access to credit, and are more likely to use alternatives to traditional banking institutions (Goodman et al, 2017). CDFIs, such as community development credit unions specializing in the needs of low-income members, have a lot to offer people with disabilities. Listed below are some examples.

ABLE Accounts

Achieving a Better Life Experience (ABLE) accounts are special savings programs designed for a subset of people with disabilities based on their age of disability onset and whether or not they have a disability significant enough to qualify for SSI or SSDI benefits. State entities responsible for administering 529 education savings plans are charged with the responsibility for administering ABLE accounts or contracting with a third party to administer ABLE accounts. The legislation that authorized ABLE accounts, which allow increased savings without disqualifying eligible individuals from important income benefits and health insurance protections in the Medicaid program, specifically identifies CDFIs as eligible institutions to administer such accounts. Thus, CDFIs are strongly encouraged to talk with their state Treasury Department about the role they could potentially play in managing ABLE deposit accounts, beneficiary financial reporting, and financial transactions for qualified disability-related expenses in accordance with the rules and policies governing ABLE accounts.

Member Services in Community Development Credit Unions

Community Development Credit Unions (CDCUs) are encouraged to expand outreach to people with disabilities to promote improvements in financial well-being, creditworthiness and divert people with disabilities away from predatory or otherwise high-cost alternative solutions to traditional banking.

People with disabilities may lack access to the information and support necessary to navigate the complicated array of financial services options, or lack access to technology, that make it difficult to monitor their own accounts. In addition, people with disabilities are subject to rigorous reporting requirements related to their personal financial affairs and may require assistance from member services. Many CDCUs are connected to Volunteer Income Tax Assistance (VITA) programs that assist people in accessing the Earned Income Tax Credit (EITC) and other refundable credits or deductions for which people with disabilities may qualify. In addition, CDCUs often promote financial education, asset building, and credit enhancements that people with disabilities could benefit from but may not be aware of the resources that exist in their community.

In terms of products, people with disabilities may be in need of small dollar loans to finance stocks and inventory for a business, purchase a vehicle, or underwrite Assistive Technology (AT) product loans or home renovation loans. What people with disabilities need will depend upon the area. Sources of equity that can be combined with CDFI lending instruments will vary based on the type of loan and its purpose. For example, savings from an ABLE account could potentially qualify as a source of equity for any variety of disability-related needs, including AT, home ownership, education and more. If the loan product is intended for a business startup or expansion, this could be combined with an ABLE account, and VR through a fee-for-service agreement, or the Ticket can cover costs related to business consultation services provided through the CDFI. In addition, any number of these related expenses could be applied to work incentive programs within Social Security and Medicaid. In-kind subject matter expertise may also be found through organizational relationships, such as with Independent Living Centers, employment agencies that serve people with disabilities, or AT programs that provide free AT trials and AT training consultation as it relates to the type of financing and marketing features that would be desirable. CDFIs are strongly encouraged to engage disability leaders as well as professional organizations such as VR agencies, work incentive specialists, and state Treasury Departments, in planning activities to learn more about opportunities in their communities.

Assistive Technology including Medical Devices

PWDs are also major consumers of AT which is explored at length in the “Assistive Technology” chapter of this manual.

Social Impact Measures

CDFIs are able to measure the reach and effectiveness of their work by using impact measurement tools. Data collection and measurement are essential to influence policy, improve operations/product development, and communicate impact stories. In order for CDFIs to be effective in their lending practices and product development for the disability community, it is essential to collect impact data.

CDFIs report impact data to the CDFI Fund for compliance and submission of grant applications. Additionally, CDFIs have other tools that they utilize attract impact investors, as well as a tool to influence policy. The below section discusses Aeris, Policy Map, and the United Nation’s Sustainable Goal, and their respective roles in impact measurement for CDFIs. It is to be noted that the amount

of data collected for people with disabilities is limited to counting the individuals, rather than having a focus on outputs of detailed information for this population.

Aeris Impact Measurement

Aeris® provides comprehensive, third-party assessments of private alternative investments that pursue social and environmental goals. This includes loan funds such as CDFIs, small business lenders, development finance authorities, and bank consortia. Aeris helps investors align their investments with their values, while meeting their financial goals.

CARS®, the CDFI Assessment and Ratings System, was developed in 2004 as an independent project of Opportunity Finance Network (OFN), the premier membership organization for CDFIs. On January 1, 2012, CARS Inc. was incorporated as a nonprofit corporation to strengthen its independence and to launch new products and services in support of community development investing.

In June 2014, the organization changed its name to Aeris Insight Inc. to expand its services into impact investor markets. Since 2004, Aeris has issued Financial and Impact Management ratings on more than 120 loan funds, with 83 loan funds rated in 2017. More than 150 institutional investors have used Aeris' ratings and analyses in their investment decision process and their portfolio management practices.

In 2016-2017, Aeris launched a multi-pronged strategic initiative for its CDFI and Loan Fund ratings, which responded to the most-frequent requests from investor clients. The changes included the following:

- Introduction of standardized impact metric definitions—aligned with the Global Impact Investing Network's (GIIN's widely-accepted IRIS metric catalogue;
- Annual rating cycle (previously a three-year rating cycle) and a streamlined rating process to support annual ratings;
- Introduction of a new rating scale for financial strength and performance, which more closely aligns with those of Wall Street rating agencies and that is more granular and familiar to a larger universe of investors; and
- Improved Aeris Rating Report with additional standardized tables and graphs, and in a format enabling subscribers to find the information most important to them.

At the beginning of 2017, all existing ratings were mapped to the new scale, and during 2017, Aeris successfully applied the new process and scale to all new and re-rated loan funds.

Resource: <https://www.aerisinsight.com/wp-content/uploads/2018/10/Inside-Aeris-Ratings-2018.pdf>

With the introduction of the standardized impact metric definitions that is aligned with the GIIN's IRIS catalog, there are five impact areas: housing, education, economic security, environmental sustainability, and health and food access. There is one metric that captures information on people with disabilities, and it is voluntary. Also, there is no alignment with the IRIS metrics. This information was obtained from the Community Investing Impact Metric Set Guidance Paper for CDFIs: <https://www.aerisinsight.com/wp-content/uploads/2018/10/Aeris-Impact-Metrics-Guidance-Paper-for-CDFIs-Rev-July-2017.pdf>

Policy Map

Policy Map offers online mapping with data on demographics, real estate, health, jobs and more in communities across the United States. PolicyMap has over 37,000 data indicators. CDFIs can use PolicyMap to find data for their research, market studies, business planning, site selection, grant applications and impact analysis. The indicators that track information on people with disabilities are:

- Age
- Employment status
- Poverty
- Disability Type

United Nations Sustainable Development Goals (SDGs)

In his message on December 3, 2018, the International Day of Persons with Disabilities, United Nations Secretary-General António Guterres' said, "Realizing the SDGs (Sustainable Development Goals) by, for and with persons with disabilities shows that people with disabilities are at a disadvantage regarding most Sustainable Development Goals, but also highlights the growing number of good practices that can create a more inclusive society in which they can live independently" (The UN Flagship Report on Disability and Development 2018). Imagine the world in 2030, fully inclusive of persons with disabilities.

In September 2015, the General Assembly adopted the 2030 Agenda for Sustainable Development that includes 17 SDGs. Building on the principle of "leaving no one behind," the new agenda emphasizes a holistic approach to achieving sustainable development for all.

SDGs also explicitly include disability and persons with disabilities 11 times. Disability is referenced in multiple parts of the SDGs, specifically in the parts related to education, growth and employment, inequality, accessibility of human settlements, as well as data collection and the monitoring of the SDGs. Although, the word "disability" is not cited directly in all goals, the goals are indeed relevant to ensure the inclusion and development of persons with disabilities. The newly implemented 2030 Agenda for Sustainable Development holds a deep promise for persons with disabilities everywhere.

The year 2016 marks the first year of the implementation of the SDGs. At this critical point, #Envision2030 will work to promote the mainstreaming of disability and the implementation of the SDGs throughout its 15-year lifespan with objectives to:

- Raise awareness of the 2030 Agenda and the achievement of the SDGs for persons with disabilities;
- Promote an active dialogue among stakeholders on the SDGs with a view to create a better world for persons with disabilities; and
- Establish an ongoing live web resource on each SDG and disability

Sources: <https://www.un.org/development/desa/disabilities/wp-content/uploads/sites/15/2018/12/UN-Flagship-Report-Disability.pdf> and <https://www.un.org/development/desa/disabilities/envision2030.html>

Case Studies

Cardinal Capital Management

Based in Milwaukee, WI, Cardinal Capital Management (CCM) has a national reputation in acquiring, developing, financing, and managing special needs multifamily housing. It provides development, construction, property management, and real estate asset management. Many of the properties it develops are structured using Low Income Housing Tax Credits (LIHTC). The properties in its portfolio include supportive housing for veterans, persons recovering from mental illness, persons with hearing or vision loss, and homeless people.

Cardinal needed a source for \$4,000,000 of pre-development funds, which would not be tied to specific projects. Rather the funds needed to be flexible to allow them to move between many projects, which were under development at the same time. CDFIs are able to underwrite and take the risk attendant with such a loan.

In addition to a National CDFI providing and originating the \$4,000,000 loan, a regional bank with Wisconsin in its geographic assessment area bought a 50% participation from the CDFI. This reduced the risk to the CDFI and allowed the transaction to move forward while the bank needed extra time to perform its due diligence.

The pre-development loan contained a unique characteristic in which the collateral was the balance sheet of Cardinal Capital rather than specific real estate. Cardinal Capital's revenue streams include payments from SSI and SSDI, which will ultimately act as debt service to the CDFI's pre-development loan.

By providing flexible capital to CCM, the CDFI anticipates widespread social impact over the next five years, including hundreds of affordable, accessible and safe housing units, creation of new health care facilities, and creation of over 100 new jobs.

Ultronauts

Ultronauts (formerly Ultra Testing) provides highly flexible, high-quality software testing services through exceptional onshore teams that include individuals on the Autism Spectrum. They deliver a full suite of quality assurance and testing for digital campaigns, websites, mobile apps and enterprise platforms, and competitively priced services that can be engaged on an as-directed basis or via retained teams.

When Ultronauts was a six-year old company they required a working capital loan to bridge its training of employees with developmental disabilities with the payment of the contractual work it completed. The CDFI had initially offered to provide a convertible note ahead of Ultronauts' \$4,000,000 capital raise through a Series A equity round.

The CDFI conducted its due diligence alongside a social impact investing organization and some individual investors. By allowing others to take the lead in the due diligence process, the CDFI was able to learn from others' expertise in this niche industry.

The result of the due diligence provided the CDFI an ability to invest directly in the Series A round rather than provide a loan. The goal is that in the next five years, Ultronauts will employ an additional 200 people with developmental disabilities as a result of these efforts.

Opportunity Zones

There is a run-down building in Washington, D.C. that needs to be saved. Since it is in an Opportunity Zone, investors have looked to buy the building and the two buildings adjacent to it. The three buildings currently contain 16 units of housing. However, the buildings have air rights which will allow the building to be built higher. The remainder of the block already has nice affordable housing units and the area is being redeveloped near the Washington Nationals ballpark. This is a unique opportunity to create housing for people with disabilities that did not previously exist.

Investors seeking to utilize their capital gains deferment under the Opportunity Zones statute are partnering with the CDFI to complete the transaction. The CDFI offered a renovation loan which would be collateralized with the property. The debt service will ultimately come from Section 8 Housing Vouchers. The goal is to have more than 70 units of affordable, accessible and safe housing units available to the public including people with disabilities and their families.

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Module 2 – Disability History and Policy

Course Overview

This chapter will provide an overview of important historical events in the disability rights movement. The overview will shed light on some of the causes and consequence that help to explain the socio-economic status of people with disabilities. In addition, it will introduce Community Development Financial Institutions (CDFIs) to key provisions in contemporary disability social policy that can be leveraged in formulating new products and services.

This Chapter Presents

- Historical treatment and segregation of people with disabilities (PWDs)
- Historical events and social movements that shaped contemporary disability policy
- Laws and regulations as well as support systems and services designed to promote freedom and equality

The Medical Model and Institutionalization

People with disabilities are the only minority group that cut across all social boundaries and that a person can join at any point in his/her life. A person can be born with a disability or they can acquire one. Despite how a person acquires a disability, or the age of disability onset, it is important to understand the range of barriers people may face. Barriers range from personal or social attitudes to environmental obstacles such as inaccessible settings and/or and lack of financial resources. Such barriers, and the ability to disrupt them, influence the well-being of people with disabilities and their ability to participate in society.

The medical model of disability was the norm until the mid-20th century. The medical model saw the person with a disability as “defective” or “less than” their counterparts without disabilities and in need of being fixed. Being seen as inferior led to dehumanizing experiences and effects. People with disabilities were seen as sub-human, incapable of learning, feeling, and undeserving of everyday opportunities that same-age peers took for granted. People with disabilities had very few rights. Things like public education, the right to vote, the ability to live at home and in the community were discouraged. Access to education was not guaranteed, nor was access to employment or even basic services in the community the person lived in.

Paternalistic attitudes worked in tandem with the medical model encouraging family members to institutionalize their loved ones, suggesting they would be “better off” because they would get all their needs met in one place and would not “burden” the family. Instead of accessing local community schools with their neighbors or siblings, people with intellectual or developmental disabilities became segregated and warehoused in institutions. These later became over-populated facilities that neglected their needs and led to many human rights abuses. Institutions eventually

caught the attention of journalists, political figures, and parent groups who exposed the problems and demanded change to improve living conditions, human rights protections and quality of life.

The response to the medical model of disability became the social model. First conceived by Mike Oliver in 1983, the social model suggests that the environment is the disabling factor. Using this framework, the way an environment is set up – lack of ramps, no Braille signage, inaccessible doors, etc. – is what disabled an individual regardless of his/her diagnosis. Over time, this social definition of disability led to the rise of the independent living movement, de-institutionalization, and important legislative changes promoting the civil rights of persons with disabilities.

The sentiments of the social model of disability is reflected in the following quote from the Union of Physically Impaired Persons Against Segregation (UPIAS):

“In our view it is society which disables physically impaired people. Disability is something imposed on top of our impairments by the way we are unnecessarily isolated and excluded from full participation in society.”

The War Veteran Effect

World War II (WWII) heroes were among the first people to garner national rehabilitation investment as a result of combat injuries. Although up until the mid-20th century people with disabilities were considered “defective,” war veterans were viewed very favorably by society due to the self-sacrifices they made for the nation. As a result, the U.S. Congress passed a bill funding job counseling and vocational training to war veterans in 1920. This legislation later evolved into a broader service array for people with disabilities administered now by the Rehabilitation Services Administration (RSA), a federal agency under U.S. Department of Education, Office of Special Education and Rehabilitative Services, and state Vocational Rehabilitation agencies.

Social Security Act

The Social Security Act (SSA) was signed into law in 1935 by President Franklin D. Roosevelt as part of the New Deal package. For the first time, the United States had a provision of public benefits to protect members of society from absolute poverty in the form of Old-Age Assistance, relief for people who were visually-impaired, unemployment insurance, grants to assist dependent children and maternal and child welfare, the Public Works program, and the establishment of the Vocational Rehabilitation program for people with physical disabilities). The Act called for the collection of income taxes, business taxes and sale of stamps by federal Postmasters to pay for the program.

Soon after the passage of the Act, proposals to establish the Social Security Disability Insurance (SSDI) program began; however, only incremental changes were made to the policy which was later amended to include Aid to the Permanent and Totally Disabled similar to Aid to the Needy Blind that was part of the original SSA legislation. It was not until 1956 that SSDI went into effect.

A post-war environment that established new medical technologies created higher expectations among lawmakers that people with disabilities should receive rehabilitation to return to the

workforce rather than income supports for life. Originally people with disabilities age 50 years and older were eligible for the program, which was largely ineffective from the standpoint of the rehabilitation component. The prevalence of state institutions were reasons for federal lawmakers to exclude people with mental disabilities from SSDI determination as people with mental disabilities were viewed as a state responsibility. The Supplemental Security Income (SSI) program began in 1972 as an amendment to the Social Security Act under the Nixon Administration. The SSI program was funded from U.S. Treasury funds, not the Social Security Trust Fund.

Educational Discrimination / The Ed Roberts Case

Ed Roberts was a famous activist for the disability rights movement in the United States. In 1953, he contracted polio at age 14 and became paralyzed from the neck down requiring an iron lung to breathe. Public school was no longer accessible to him and he attended high school by telephone. Despite his efforts to get the most out of his education, at one point the school system refused to allow him to graduate because he did not complete physical education classes. His mother petitioned the school board and the school's decision was reversed. Following high school, Mr. Roberts was accepted at University of California, Berkeley (UC Berkeley). Unaware of his iron lung, UC Berkeley accepted him but later denied his acceptance due to what they perceived to be his medical frailties. He challenged multiple barriers that stood in his way of attending college including acquiring acceptable housing. The school determined that the 800-pound iron lung he slept in at night was too large for a dorm room. The director of the campus health service suggested that he live in a room in an empty wing of the Cowell Hospital instead. Roberts accepted the arrangement but stipulated that the area where he lived be classified as a dormitory and not a medical facility. "We've tried cripples before, it didn't work," argued one UC Berkeley admissions officer. That statement summed up perfectly the barriers that people with disabilities faced when it came to public and higher education. That attitude also underlines the barriers faced in other areas of society.

Although attempts to block Roberts' postsecondary education ambitions were broad and daunting, once he cleared those hurdles, he became a force on campus, founding the Physically Disabled Students Program which later secured federal funding from the newly established The Federal TRiO Programs (TRiO) to provide student support services.

Roberts' admission to UC Berkeley was groundbreaking as he was the first person with a significant disability to gain admission. His success inspired other students with disabilities to apply. It was while working with the Rolling Quads, the group he founded, that the foundation of Independent Living movements was formed.

Deinstitutionalization

As the social consciousness of society began to awaken about the poor conditions and reports of abuse at institutions, calls for action by families, news media and class action lawsuits began to take hold. An example of these cries for change was Robert Kennedy's description of Willowbrook State Institutions in New York. Kennedy called it a "snake-pit." People with disabilities in public institutions suffered many human rights abuses including but not limited to being sterilized against their will, subjected to drug testing, incarceration, and warehoused against their will. They were also referred

to as “inmates” even though they committed no crimes. Eventually, these conditions led to systematic changes including the recognition of the constitutional rights of people with developmental disabilities, minimum standards for human treatment, and monitoring systems to protect and support people living in the institutions. Numerous state and federal laws were passed that facilitated community-based living, rather than public institutions. This was made possible by several cases of litigation. In 1991, New Hampshire became the first state in the country to close its state institution, Laconia State School. However, although laws have drastically improved, institutions in some states still exist today.

The Developmental Disabilities (DD) Act

An example of a public law that substantially improves and underscores the civil and human rights of persons with developmental disabilities is the Developmental Disabilities (DD) Act which was passed in 1975.

The Act reads in part:

“assure that individuals with developmental disabilities and their families participate in the design of and have access to needed community services, individualized supports, and other forms of assistance that promote self-determination, independence, productivity, and integration and inclusion in all facets of community life.”

The DD Act involves key stakeholder organizations critical to the implementation of the Act in every state in the country. The stakeholder organizations include State Councils on Developmental Disabilities, Protection and Advocacy Centers, and University Centers of Excellence in Developmental Disabilities. DD Councils are federally funded, self-governed organizations responsible for addressing the most critical needs of people with developmental disabilities. Major activities include advancing public policy, systems changes, and building capacities of self-advocates so that people with disabilities can self-determine their own lives and participate in society like anyone else. State Councils have five-year state plans that speak to these critical issues, and they work with core partners, self-advocates, and other stakeholders to fulfill their mission.

Protection and Advocacy (P&A) Centers play an important role in fulfilling the DD Act by empowering people with developmental disabilities and advocating on their behalf for their civil rights while also helping people navigate complex systems. In addition, P&A systems offer training and technical assistance to agencies and policy makers on the rights of people with developmental disabilities, as well as collect information on complaints and rights violations that need to be acted upon. P&A systems serve as advocates on a variety of critical issues, including but not limited to the DD Act, Assistive Technology Act (ATA), Voting Accessibility, and other rights consistent with public benefits including SSI, SSDI and Medicaid policy, work incentives, community-based living and the Individuals with Disabilities Education Act (IDEA), and information about the Americans with Disabilities Act (ADA).

University Centers for Excellence in Disabilities (UCEDs) help to fulfill the DD Act by providing education, research and service so people with disabilities can participate fully in the community.

Much focus is on promoting independence, productivity and community inclusion. UCEDs implement a variety of activities consistent with their mission along the spectrum of the life-course advancing early supports and services, early childhood education, inclusive education, post-secondary education, employment, community living, and other efforts critical for full participation in society.

Given the fact that they are located within a university setting, UCEDs are often capable of procuring grant resources critical to the development of a systems change, or demonstration for incubation, and can be helpful in conducting research that may be necessary for projects that are in strong alignment with their mission.

Public Education

The right for people with disabilities to have access to education evolved over time as a result of litigation and organized advocacy. In 1975, The Education for All Handicapped Children Act (PL 94-142), now referred to as the Individuals with Disabilities Education Act (IDEA), passed which mandated free and appropriate education. This law requires public school systems to educate children in the least restrictive environment, rather than an out-of-school placement or a segregated facility. Prior to this change, law schools had the ability to deny access to education and many states had laws in place that excluded students with disabilities. As the Act took hold, schools gradually reduced placements in high-cost settings which not only unnecessarily segregated students with disabilities but diverted school district money away from public school systems. Over time, IDEA has increased capacity in public school systems to provide early supports and services, early childhood education and primary and secondary education. This, in turn, has contributed to dramatic improvements in the number of students accessing inclusive education in the general education classroom. IDEA has also helped improve the rates of high school student graduates, and the percentage of students with disabilities accessing post-secondary education.

The 504 Sit-In

In April 1977, the independent living movement organized a national protest at federal office buildings to advocate for the passage of Section 504 of the 1973 Rehabilitation Act. The intent of the Section 504 passage was based on the 1964 Civil Rights Act mandating the integration of people with disabilities into mainstream institutions.

The Act reads in part:

“no qualified individual with a disability should, only by reason of his or her disability, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.”

At the time, architectural barriers prevented people with disabilities from accessing public spaces, but even if buildings were physically accessible, people with disabilities had no right to services, including and not limited to education, public transportation, public services or social services for personal care or direct support needs. Any support was considered informal and provided through

personal family and friends. Self-advocates endured great risks and after-effects of their health in participating in the protest – often going without medications and transfers – in the interest of getting their message across. The 504 Sit-in of people with disabilities that occupied the federal building in San Francisco, California remains the longest non-violent protest in national history, lasting approximately 30 days. Judith Heumann, the cofounder of the independent living movement was critical to the passage of the Act. As a result of public testimony and protests, Section 504 was signed making nondiscrimination a legal right. This made society more accessible to persons with disabilities and set the foundation for passage of the ADA passage in 1990.

We Will Ride – Americans Disabled for Access to Public Transit (ADAPT) in Denver

In the late 1970s, Reverend Wade Blank was frustrated that the nursing facility where he worked resisted its residents living more independent lives. In response, he started the Atlantis Community, a center for independent living, which helped bring people of all disabilities together.

Transportation advocacy was the origin of the civil rights movement in Denver, Colorado. On July 5-6, 1978 the We Will Ride protest was held. Men and women of the Atlantis Community known as “The Gang of 19” blocked traffic and threw themselves in front of buses chanting “We will ride” to fight for transportation access. This protest established ADAPT (Americans Disabled for Access to Public Transit (ADAPT) and led the way to Denver being the first city with accessible buses.

Deaf President Now Protests

Gallaudet University started as a school for the deaf in 1857, and in 1864 a collegiate division was formed, making it the first college for deaf students. Over more than a century in existence, the school, located in Washington, D.C., never had a president that had a hearing related disability.

In March 1988, the students of Gallaudet University, along with many deaf advocacy groups, came together to demand that a deaf president be instated. Students, enraged by the hiring of Elizabeth Zinser, a hearing person, over Irving King Jordan, a qualified deaf individual, shut the campus down and demanded representation in leadership. They organized the “Deaf President Now” student protest, shutting down the university. As a result of their agency, Gallaudet hired its first deaf president. This spread the message to the world that:

“A deaf person can do anything a hearing person can do, except hear” - Irving King Jordan.

Fair Housing Act

The Fair Housing Act of 1968 was amended in 1988 to promote housing protections for persons with disabilities through Title VIII of the Civil Rights Act which prohibits discrimination on the basis of race, color religion, sex or national origin in housing sales, rentals or financing. This amendment extended the Fair Housing Act protections to persons with disabilities and their families, and children with

disabilities. Disability, as defined in the Act, includes persons with a physical or mental disability that substantially limits one or more major life activities such as hearing, seeing, speaking, breathing, performing manual tasks, walking, caring for oneself, learning or working.

Americans with Disabilities Act (ADA)

In 1986, the National Council on Disability published “Toward Independence,” a newspaper that examined incentives and disincentives in federal laws toward facilitating the independence of people with disabilities. The paper called for the adoption of cross-cutting public policy measures to remove barriers to the integration of people with disabilities into society in the United States. Justin Dart, a corporate executive from Texas, led a national information campaign with disability advocacy organizations and other stakeholders to better understand discrimination faced by people with disabilities in all aspects of life and the incentives and disincentives that existed in federal law that prevented full participation in society.

Comprehensive civil rights legislation was proposed as a bipartisan collaborative effort among legislators. It was signed into law on July 26, 1990 but continued to evolve through the ADA Amendment Act of 2008 based on the interpretation of the law by the court. Due to the court’s narrow interpretation of the law, Congress amended the ADA to provide better protection for people with disabilities with cancer, epilepsy, and diabetes (ADA National Network). It is the first wide-ranging declaration of equality and civil rights for people with disabilities and today remains the most comprehensive civil rights law in the world.

The ADA bans discrimination on the basis of disability in employment (Title I), public services (Title II), public accommodation (Title III), and telecommunications (Title IV). The ADA and Section 504 of The Rehabilitation Act work in close concert with other laws to protect equal opportunities and civil rights of persons with disabilities. For example, the ADA established telephone relay services for people who are deaf or hard of hearing; and in 2010, the Twenty-First Century Communications and Video Accessibility Act (CVAA) was passed to update accessibility laws with 21st-century technologies for digital, broadband and mobile advances. In ushering in the new law, former President George H. W. Bush, proclaimed, “Let the shameful wall of exclusion finally come tumbling down.”

The Olmstead Decision

The Olmstead case was decided in June 1999 by the United States Supreme Court and found that unjustified segregation in an institution constitutes discrimination under the ADA.

Lois Curtis and Elaine Wilson, the plaintiffs in the case, were voluntarily admitted to a state run institution in Georgia to address their psychiatric and developmental disability needs. Although their mental health needs were met and they no longer benefited from the institutional placement, they remained confined to the institution and were denied access to live in the community. As a result, they filed a suit against Commissioner Olmstead, the Georgia Commissioner of Health Resources under Title II of the ADA, which prohibits discrimination against qualified individuals with disabilities in all programs, activities, and services of public entities. The decision in this case, known as the

Olmstead Decision, requires public entities to provide community-based services. The case indicated that denying access to community living diminishes opportunities for family relationships, opportunities for employment and social connections. This perpetuates social myths that people with disabilities are unworthy or incapable of participating in community life. This Supreme Court decision stated that people have a right to be in the least restrictive environment and have a right to live in the community rather than in an institution, if that is their desire.

Ticket to Work and Work Incentive Improvement Act of 1999

Although the ADA and Section 504 resulted in sweeping changes to promote equality of opportunity and non-discrimination rights, prior to the passage of the Ticket to Work and Work Incentive Improvement Act (TWWIIA), major problems persisted in social policy that disincentivized employment. In seeking gainful employment opportunities, a major consideration was access to continuous healthcare despite pre-existing conditions. Private health insurance policies were largely inadequate for addressing Durable Medical Equipment expenses, and lifetime limits on insurance posed barriers to having special healthcare needs met that the Medicaid program covered. New income gains would never be enough to compensate for out-of-pocket medical expenses necessary for healthcare premiums and unmet medical needs. In addition, pre-existing asset-limits imposed by the Medicaid program made it hard for people with disabilities to accumulate savings from earned income for longer-term needs. The combination of these factors resulted in people with disabilities having to choose between (a) being productive in the workforce or terminating health insurance that reimbursed for services that they needed in order to work.

The passage of the TWWIIA addressed several serious barriers. First, it created options for persons with disabilities who work to retain eligibility for Medicaid and “buy-in” to the program. This allowed people to work and earn much greater income than before and to retain access to healthcare options necessary to work. The decision to add the option of a Medicaid Buy-In program is a state decision, and not all states have a Medicaid Buy-In program. Those that do have Buy-In programs often increased allowances in asset limits for people who work. Participants in the Buy-In program had new savings allowances, enabling savings from earned income toward longer-term goals. In addition, the Act created procedures to incentivize people with disabilities to test employment as a means to reduce the fear of losing cash payments and health insurance due to work. TWWIIA also expanded the availability of personal care attendant services in the workplace.

Another major provision of the law was the creation of the Ticket to Work. This work incentive promotes choice and control by providing a voucher-like option for beneficiaries to purchase employment-related goods and services necessary to become gainfully employed and financially self-sufficient from Social Security. Partnership Plus is an option through the Ticket to Work Program that allows individuals to access services from Vocational Rehabilitation (VR) in getting a job, and access to services from Employment Networks (EN) that may be needed to maintain employment. Funds provided through VR and the Ticket program can be used to cover costs related to services that promote workforce participation and retention for greater financial self-sufficiency from the public benefits.

Higher Education Opportunity Act

The Higher Education Opportunity Act of 2008 (HEOA) is federal legislation designed to strengthen the educational resources of colleges and universities and to provide financial assistance for students in post-secondary education. The HEOA is a reauthorization of the Higher Education Act of 1965, which has been reauthorized multiple times. This law contains a number of important new provisions that will improve access to postsecondary education for students with intellectual disabilities. There are several provisions that address financial aid and that create a new model demonstration program and coordinating center for students with intellectual disabilities.

HEOA targets students who accessed special education services through the Individuals with Disabilities Education Act (IDEA) in high school and may not have graduated with a high school diploma as a means to promote academic enrichment, social development, independent living and competitive employment. College and universities that receive federal funding and are authorized as Comprehensive Transition Programs (CTP) through the U.S. Office of Postsecondary Education for students with intellectual disabilities are able to grant Federal Student Aid to income eligible students. However, CTP students at this time are only eligible for Pell Grants, which is generally a small amount of aid. Not all states have a CTP. Although progress has been made in granting access to higher education, not all families have access to the resources necessary to enroll in post-secondary education or pay for the cost of housing. More than 270 college options for students with intellectual disabilities exist in the U.S. at this time. Thirty-two states are authorized to grant financial aid.

CDFIs are encouraged to consider products that may afford individual students and families access to higher education and job training opportunities. This is not just for people with intellectual disabilities, but all students with disabilities who may have a gap in financing their education. In many situations, VR agencies may consider contributing toward the cost of education or training so long as the goal is listed in the Individual Plan for Employment. In addition, Achieving a Better Life Experience (ABLE) accounts, and work incentives in SSI, SSDI or the Medicaid program are sources and uses of funds that, when combined with a loan from a CDFI fund, may bridge the gap necessary for the cost of attendance.

Healthcare Policy

In 1965, the Social Security Act was amended to include Medicare (Title XIX) and Medicaid (Title XVIII). Medicare is available to eligible retirees, workers with disabilities, and their dependents. People qualify for Medicare as a result of quarterly payroll taxes to the Social Security Administration which later links to Medicare eligibility. Medicare Part A helps to cover hospital-related expenses, Medicare Part B helps to cover medical insurance.

Medicaid is a joint insurance program funded by federal and state government and is available to people who meet medical and financial eligibility guidelines. Eligibility is linked to SSI determination. SSI and Medicaid eligibility are both means-tested benefits based on income and assets.

Medicaid provides insurance for health care, prescriptions and supports, and services needed for people with disabilities to live, work and play in the communities. Some people, due to the significance of their disability, are eligible for the Community Care Waiver to pay for long-term supports that cover personal care attendant services and direct support services for employment and community living. These services must adhere to certain rules and regulations governed by the Centers for Medicaid and Medicare Services (CMS) and state Medicaid plans. These services are subject to “Settings Rules” designed to make sure community-based services funded through Medicaid and provided in residential and non-residential settings offer full access to the community in the most integrated setting. The Settings Rules and how states comply with the federal requirements are important information for CDFIs to take into consideration. These guidelines impact the construction or development of housing, community facilities and/or other buildings from the standpoint of maximizing the benefits of community inclusion and minimizing segregated settings.

Access to healthcare has always been a barrier for people with disabilities with the costs of treatments and medications almost ensuring that people either went into massive debt to acquire care or went without and faced possible death. The Medicare Kidney Disease Entitlement from the Social Security Amendments of 1972 allowed for dialysis access at no cost to the patient. The Patient Protection and Affordable Care Act broke down barriers for people with disabilities to have access to insurance, pre-existing conditions disallowed or severely limited people’s access to insurance and affordable care. This also eliminated lifetime limits for care. Many people, thanks to this legislation, had access to insurance for the first time in their lives.

Employment and Business Development

A variety of agencies provide employment services and supports to individuals with disabilities. Vocational Rehabilitation (VR) is a jointly funded program by the federal government and state governments. It provides a variety of services, supports, evaluation, and assessments that assist with the rehabilitation and competitive employment of eligible individuals with disabilities. Certified Vocational Rehabilitation Counselors assist individuals with setting career goals based on individual interests, skills and capabilities. Legislation passed in 2014, known as the Workforce Opportunity Improvement Act (WOIA), transformed the way VR delivers services. It also emphasizes reaching youth and young adults with disabilities sooner and more proactively than ever before. Some of the changes include education and training on pre-vocational knowledge and careers, access to the U.S. Department of Labor’s Americas Job Centers, and a focus on performance measures of quarterly earnings, individual skill gains, credential attainment and independent living. VR contracts with service providers and vendors and provides funding consistent with Individual Plans for Employment. Resources provided by VR in fulfillment of Individual Plans for Employment may be combined with other funding necessary to fulfill the employment goal. Examples of such goals include but are not limited to post-secondary education and business development.

Summary

The Acts mentioned in this chapter accomplished the following:

- Rejected the medical model of disability and called for acceptance and enforcement of the social model.
- Underscored that people with disabilities: (1) don't need or want to be fixed; and (2) can voice their own needs.

People with disabilities have the right under Federal law to live in the community and have access to supports and accommodations necessary to address attitudinal, architectural, and programmatic barriers in order to do so. The disability civil rights movement brings voice to social problems and solutions made famous by the Independent Living mantra: "Nothing About Us Without Us!"

Module 3 – Core Issues

Course Overview

The disability community is extremely large and cuts across all races, genders, religions, ethnicities, and ages. However, this community has needs similar to the general population that the CDFI world can help address. When CDFIs are looking to serve people with disabilities, it is important that they see the person first, not their disability. This training helps CDFI staff to understand acceptable terminology when addressing people with disabilities, unique challenges that people with disabilities face, and common barriers to financial tools that must be eliminated in order for people with disabilities to live, work and socialize on a daily basis.

This Chapter Presents

- Specific, research-based evidence about the core issues impacting the disability community and ways CDFIs can help improve outcomes for persons with disabilities.

People with Disabilities Want What Everyone Else Wants

All people want to have a home, financial stability, food, health care and the ability to work. People with disabilities may require modifications, adaptations or accommodations to participate in the workforce, their community and the educational environment. At the end of the day, the wants of people, regardless of disability status, are the same.

Many people with disabilities face barriers that others do not. These include:

- Earning limitations
- Asset limitations
- Higher under/unemployment
- Institutionalization
- Technology access
- Access to health care
- Affordable, accessible and integrated housing
- Accessible transportation
- Attitudinal barriers

These barriers and related consequences can keep people with disabilities from achieving their goals, preventing them from successful independence alongside their non-disabled peers. For example, earning and asset limitations present financial constraints, holding people with disabilities back from

building careers, buying homes and more. Insufficient accessible transportation affects everything from engaging with the community to accessing employment, grocery stores, or healthcare providers.

Luckily, programs and strategies exist to address some of these barriers in ways that support independence and financial success. CDFIs can learn about these programs and strategies, engage people with disabilities and support individual and community growth.

The Landscape

The disability community is a significant “minority group” that intersects religion, ethnicity, gender identity, and age, yet is sorely lacking earned income and other measures of economic success. Many people with disabilities are unemployed or underemployed:

- 14% of people with disabilities are fully employed.
- 16% of people with disabilities are underemployed.
- 70% are unemployed or out of the workforce entirely.
- Adults with disabilities work fewer hours, receive lower wages, and earn less annually.
- Labor force participation for the disability community is extremely low.
- The employment and unemployment rates do not consider institutionalized populations, only those actively looking for work.
- Various barriers impede labor force participation (discrimination, training, education, and resources).

Some members of the disability community are not looking for a job because of their disability or because of the pervasive myth that if you work, you will lose your disability related benefits such as Security Disability Insurance (SSDI), Supplemental Security Income (SSI), Medicare, Medicaid or In-Home Supportive Services (IHSS). The risk of losing those important benefits is high, and if you lose them, you may end up with extreme financial and health consequences, resulting in displacement or institutionalization.

One reason that some CDFIs who serve the disability community developed their own financial education curriculum is because there are unique circumstances traditional banks or credit unions don’t typically understand. For example, many lenders promote a key message of: “You need to save! Save for your future, save for a rainy day!” However, in the disability community, if you save too much, you may be ineligible for SSI, Medicaid or other life sustaining benefits. Understanding this dynamic, and many other unique components is critical for CDFIs interested in creating financial products and services for people with disabilities.

Core Issues

Language Matters

What you say and write may enhance the dignity of people with disabilities or inadvertently reflect stereotypes and negative attitudes. Some words and phrases don't recognize the broad range of capabilities of people with disabilities. People with disabilities don't need or want to be pitied, nor be considered "courageous" or "inspirational" simply for accomplishing regular activities, holding jobs and the like. It is important to avoid pitying or glorifying people with disabilities and instead, treat individuals as you would any non-disabled person going about their life. Using inclusive language is also important, both in general and when directly interacting with people with disabilities.

The words we use can empower a person, or negatively impact their sense of self-worth and identity. Value-laden language can ostracize an individual, setting them apart from their colleagues, friends, coworkers or associates. Such language could include referring to someone as "suffering" from a disability, being "afflicted with an ailment," or (in the case of someone who uses a wheelchair) as "wheelchair-bound." These are all words and phrases that, when heard repeatedly, can impact a person's sense of worth. It is better to simply refer to somebody without explicitly calling out their disability or, if mentioning the disability, doing so in a neutral fashion.

There are two primary, non-value laden methods for referring to people with disabilities:

1. **Person first** –The person comes before the disability (people with disabilities, people who are hard-of-hearing, person who has low-vision, a person with autism)
2. **Identity first** – The disability is more prominently stated, generally as a sign of self-identity ("I am autistic." "I am Deaf.")

It is important to note that you should ask a person their preference and pay attention to how they refer to themselves, in person or in writing, and model that. Keep in mind that individuals may prefer different language than the "person first" or "identity first" examples above, as well.

Adult Decision-Making and Effects on Financial Independence

Aside from attitudinal and environmental barriers a person with a disability may face, there are also barriers to adult decision-making. When most people turn 18, this is seen as a milestone and a move toward independence. When some people with disabilities are nearing adulthood, it is all too common for their parents (or other adults) to make a move toward guardianship or conservatorship (the terminology differs by state), which gives the parent or adult full authority to continue legal and financial decision making for the adult with a disability. This arrangement limits a person's ability to enter into contracts, financial arrangements and other legal matters that a person without a disability or even a person with a disability who is not under guardianship would be free to do. Guardianship greatly reduces the independence and learning opportunities of a person with a disability, with long-

term impacts on economic potential, social integration, life-skills development (e.g. personal budgeting) and other aspects of well-being. The process of establishing and maintaining guardianship can be costly and time consuming, as it includes interaction with courts, regular financial reporting, and more.

People with disabilities not under formal guardianship but who can benefit from assistance or oversight in decision-making matters can appoint an agent with power of attorney. Often used as a support for an individual, power of attorney can be granted in a number of areas, such as for making financial, legal and property management decisions.

People with disabilities can also use systems of “supported decision making” where they have full legal management of personal matters but consult with trusted individuals or networks to manage those matters well. Supported decision making allows an individual to choose a circle of support, such as people that can provide counsel to make decisions on money, agreements and contracts. The final decision of how to proceed lies in the hands of the person with the disability.

Some people with disabilities may benefit from conservatorship and/or power-of-attorney arrangements, depending on their ability to understand and manage important personal matters (e.g. finances, legal issues and medical management). However, cases exist where people with disabilities are put in situations where they could manage personal matters through supported decision making or, in the case of conservatorship, use less constrictive systems such as power-of-attorney arrangements. Supported decision making can also empower individuals to eventually move toward full independence in managing personal matters. Many disability advocates also recognize that the right to independence includes the right to make mistakes and learn from those mistakes, just as people who do not have disabilities do. In the end, people with disabilities deserve independence as much as possible and should be given options to maximize that independence and important decision-making.

The following are resources for adult decision-making and effects on financial independence:

- Representative Payee (<https://www.ssa.gov/payee/>)
- Powers of Attorney (<https://patf.us/what-we-do/financial-education/>)
<https://www.disabilityrightspa.org/wp-content/uploads/2018/03/CCSDM-11E.pdf>
- Guardianship (<https://patf.us/what-we-do/financial-education/>)
- Supported Decision-making (Center for Public Representation)
<https://centerforpublicrep.org/initiative/supported-decision-making/>

Asset Limitations Affect Financial Planning

Asset limitations for government benefits also limit a person’s ability to plan for their future or obtain durable medical equipment (a type of assistive technology) not covered by insurance. A new power wheelchair could cost as much as \$50,000 for a person with a significant physical disability. This cost

could be out of reach if this person does not have insurance, such as Medicare or Medicaid. Restrictions on how much you can have in savings and how much you can earn also puts that person at a disadvantage. A person may have to remain in poverty to get the basic tools they need to live independently.

A non-exhaustive list of these income and asset limits include:

- **Supplemental Security Income (SSI)** – A cash benefit for some people with disabilities that does not allow recipients to have more than \$2,000 in assets (for an individual) or \$3,000 in assets (for a couple); a few states have slightly different asset limits based on historical criteria. SSI benefits decrease gradually as recipients earn income, generally at a 2-to-1 ratio with a small “disregard” before benefits start going down. When somebody earns too much money, their SSI check goes away entirely.
- **Medicaid** – A government program that provides health care, including home and community-based waiver services, to low-income individuals, including people with disabilities. Medicaid has several categories tied to SSI eligibility. Medicaid categories, such as 1619(b) and Working Disabled Programs, allow for more income before Medicaid is cut off but may also include asset limits. Important benefits such as In-Home Supportive Services (IHSS) attendant care (which can be upward of \$50,000/year for attendants’ salaries) is also tied to Medicaid. Losing Medicaid means losing more than just conventional healthcare and durable medical equipment.
- **Social Security Disability Insurance (SSDI)** – A cash benefit for individuals who previously worked, paid FICA taxes, acquired a disability and can no longer work; children with disabilities who have a parent on SSDI may receive similar benefits. SSDI does not have any asset limits. However, it may be cut off entirely if recipients earn too much money for several months in a row (this figure, “Substantial Gainful Activity,” was slightly more than \$1,200/month in 2019 and goes up yearly).

SSDI recipients also receive Medicare. If a recipient works and loses their SSDI, they keep Medicare for several years, but it eventually goes away leaving a them to rely on other health insurance.

People with disabilities often use other important government programs, such as low-income housing and Supplemental Nutrition Assistance Program (SNAP) benefits. These programs have income and asset limits as well.

Most people with disabilities would like to increase their income and savings. However, conventional wisdom around earning and saving money may not work for people with disabilities who receive benefits with income and asset limits. For example, the Money Smart curriculum from the FDIC has a statement that says you should “Pay Yourself First” (a phrase popular in personal finance and retirement planning literature). However, many people with disabilities’ primary income may be SSDI or SSI, meaning they limit their incomes and savings out of fear of losing those benefits. Therefore, they are unable to follow the suggestions that are provided, such as in the Smart Money curriculum. People with disabilities could then end up in a cycle of unemployment, poverty and financial instability. Fortunately, lesser known programs exist that enable people with disabilities to earn and save money. Some of these programs include:

- **ABLE Accounts** – Savings and investment accounts for people who acquired their disability before age 26 (proposed legislation could raise this age cap). Account holders can save \$100,000 and keep SSI, or several hundred thousand dollars and keep Medicaid and other means tested benefits.
- **SSI** – Has a gradual, 2-to-1 phase out process that allows recipients to increase their income. The gradual phase out process is especially useful for recipients who choose part-time work or those who prefer to stay under the maximum earnings amount.
- **SSDI** – Has a 9-month “trial work period” and 5-year “extended period of eligibility” that allow recipients to earn money and, if work is too difficult, easily re-enroll in SSDI in that timeframe.
- **Medicaid Recipients** – Most disabled Medicaid recipients are eligible for Medicaid because they receive SSI. However, there are other Medicaid categories that allow qualifying people with disabilities to earn more money and, in some cases, save more money. For example:
 - Medicaid 1619(b) provides a higher earning threshold for working people with disabilities: the threshold varies by state, from a low of \$27,826/year in Alabama to a high of \$66,452/year in Connecticut (in 2019) (the Northern Mariana Islands had a \$19,524 limit in 2019). Recipients with high medical expenses can apply for an “individual exclusion” above the usual limit.

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- Medicaid Working Disabled Programs are available in some, but not all states. These programs allow people with disabilities to work and keep Medicaid, occasionally with a small monthly premium. The average annual gross income limit is around \$62,000/year (in 2019) with one state's limit topping \$122,000/year (Idaho). Certain states also allow for higher asset limits.

People with disabilities who know about these and other income and asset-building programs may choose to work, build their self-esteem and increase their economic success. It is valuable to learn more about these programs and to support people with disabilities as they increase their income and assets.

Disability-Related Expenses

People with disabilities face numerous disability related expenses that people without a disability do not. The exact expenses vary by type of disability, individuals' existing living situations (e.g. housing cost and accessibility), health insurance access, and so forth. Just a few examples of these expenses include:

- Durable Medical Equipment (DME), such as wheelchairs, walkers, actuating hospital-style beds, white-tipped canes (for blind and low-vision individuals), etc.
- Disposable medical supplies, such as catheters, colostomy bags, vinyl gloves, etc.
- Equipment to improve sensory awareness, such as hearing aids or prescription glasses.
- Adaptive software, such as voice dictation for typing and navigating screens, text-to-speech to receive on-screen information and navigate computers, and screen-zooming software.
- Expenses for service animals, such as veterinary costs and service animal products.
- Home modifications, such as installing ramps or lifts, modifying bathrooms, etc.
- Personal attendant care/services may include household chores, cooking, feeding, dressing, transfers, etc. Attendant care can be funded directly out-of-pocket and/or by using a combination of government and personal funding.
- Extra costs for accessible transportation. For example, ride-sharing services don't yet offer wheelchair-accessible vehicles nationwide, so wheelchair-users may have to use more expensive taxis. They may choose to purchase an accessible van or compensate others for driving.

- People with disabilities, on average, have higher medical expenses than people without disabilities. While some people with disabilities, notably those on Medicare and/or Medicaid, have zero or reduced co-pays, those with private insurance may spend much more on co-pays and deductibles.

In some cases, insurance or other support agencies, such as the Department of Rehabilitation (DOR) for individuals who are working, can cover these and other disability-related expenses, while other costs must be paid for out-of-pocket. Insurance policies, including Medicare and Medicaid, often only cover the lowest-cost option for any given supply or technology. Alternatively, individuals who prefer higher-quality versions must cover the difference out-of-pocket. Attendant care, which may range from under \$100 per month to tens of thousands of dollars per year, is usually not covered by private insurance and is usually paid for out-of-pocket directly to the attendants, staffing agencies, or government programs. Coverage varies by state, due to Medicaid policies, state-level regulations for private insurance, and other factors.

Limited or No Financial Education

Financial education is rarely taught in schools and students with disabilities may be excluded from financial education when it is taught, as teachers may tell them that the curriculum is not important for them and they are free to take a break from that class (this has indeed happened before, and is based off stereotypes of people with disabilities as not financially capable or independent). For people who may be in special education, there are few lessons in managing benefits, expenses, avoiding scams and other important financial topics. Additionally, important disability-related topics are not addressed in most states' financial education curricula. People with disabilities need basic financial education like budgeting and debt management, but they also need to know about topics such as income and asset limitations, retaining benefits, advocating for themselves (e.g. for insurance to cover necessary medical devices), and tax write-offs for disability and health related expenses. The combination of incomplete financial curriculum and the exclusion of people with disabilities from financial education can threaten their future economic stability and hinder success.

Poor or No Credit

Many people with disabilities have not had the opportunity to earn a decent wage placing them at a disadvantage for using the financial system to build or improve credit scores and creditworthiness. Some of the credit building actions people with disabilities often avoid include having a savings account, getting a line of credit or opening a checking account. Lack of employment can equate to a person being unscored or having an effective credit score of "0." Few financial institutions will grant access to an account or line of credit to people with low or no credit scores.

Another scenario when a person with a disability could have his/her credit scores damaged is during the transition phase shortly after acquiring a disability as he/she adjusts to the new financial reality.

Having poor credit has many consequences in the modern financial system. People with disabilities without checking accounts may instead use check cashing services with unnecessary fees; or those without credit cards may use payday loans with exorbitant interest rates. They may have difficulty purchasing long-term assets such as a home or vehicle. They may even have difficulty obtaining employment since some employers perform credit checks as part of the hiring process. The problems tied to poor credit can create a devastating cycle of reliance upon high-interest financial services.

Limited Targeted Marketing and Outreach

CDFI's can provide opportunity in the form of educational events, outreach activities, and flexible financing options. A CDFI should also be familiar with resources for information and should solicit feedback from organizations serving people with disabilities in order to make their products and services as accessible to as many people as possible. Resources can come in many forms such as: (1) Centers for Independent Living (CILs); (2) organizations supporting specific disability categories; and (3) national entities that address disability issues, financial education, and economic equality. CDFIs are in a unique position to provide supports to communities that may otherwise not have access to financial information, financial services, accommodations, or economic success. To do so, CDFIs must conduct effective marketing and outreach to the disability community.

Marketing to the Disability Community

When marketing to or communicating with people with disabilities, it is important to remember to treat them with respect just as if they did not have a disability. It is important to use appropriate representations of them in photos, video, film, advertising, and other visual presentations. Furthermore, appropriate representation avoids stereotyping and presents people with disabilities with dignity.

If a CDFI is interested in working in the disability community, they can connect with disability support groups, such as an Alternative Financing Program, the National Association of Councils on Developmental Disabilities, Disability Support Service, National Alliance on Mental Illness, and others. These agencies can help CDFIs understand and connect with the target population. To learn more about support groups in a CDFI's service area, the CDFI can Google or conduct other research to find the names of organizations nearby.

CDFIs must market to organizations that will help them reach their target audience, such as disability organizations, Centers for Independent Living (CILs), and parent support groups. Disability support groups such as a Multiple Sclerosis (MS), Amyotrophic Lateral Sclerosis (ALS) (or Lou Gehrig's disease), or veteran support groups are also key marketing partners or audiences.

Social Media

If a CDFI wants to be effective in marketing to people with disabilities, it must use social media. Many people with disabilities are turning to Facebook, Instagram, Twitter, and LinkedIn to locate professional service providers and vendors. Larger CDFIs may have the staff capacity to track and analyze social media trends to ensure social media campaigns are reaching their target audience. This includes having more focused target audiences such as people with specific disabilities, families, people on fixed income, etc. For smaller organizations that do not have the internal capacity to

analyze social media in-depth, social media analytics tools such as Sprout Social can track performance and trends and show what messages and stories are resonating with whom.

Outreach Opportunities

Aging in place, particularly for seniors and people with disabilities, entails living in one's own home as long as possible, instead of moving into an institution such as a nursing home or intermediate care facility. The strategy has become more popular as people are shying away from moving into more restricted environments. As of late, more services may be available to support in-home living, namely attendant care and outpatient health maintenance (e.g. kidney dialysis). CDFIs can make loans with people who are choosing to age in place and need assistive technology to make this possible, such as for stair glides or grab bars. Some people need to make home modifications, such as for widening doorways, converting bathtubs or showers into roll-in showers, lowering kitchen counters and/or adding a first-floor accessible suite. A great outreach opportunity is for CDFIs to partner with equipment vendors to find the most cost-effective products and develop financing options. Hearing aid vendors and service provider organizations are a great place to start building business within this community, as well. Organizations that provide attendant care for people in their homes are widespread and often provide other independent living services, including employment support and training, community activities and more. Some large ones are KenCrest (www.kencrest.org), Keystone Human Services (www.keystonehumanservices.org), and SPIN (www.spininc.org). Organizations may be local, regional or national. Every state has disability service organizations that are looking for solutions to issues related to aging in place.

Accessibility

The following resources and guidelines should be used to ensure that websites, advertisements, services and other CDFI resources are fully accessible. When most people think about “accessibility,” they think about physical access: wide enough doorways, ramps, elevators, and other layout features. However, digital and communication accessibility is vital for people with sensory disabilities (blind/low-vision or hard-of-hearing). CDFIs must address all pieces of accessibility to support all people with disabilities.

Web Content Accessibility Guidelines (WCAG) is developed through the World Wide Web Consortium (W3C) process in cooperation with individuals and organizations around the world that share the goal of providing a single shared standard for web content accessibility that meets the needs of individuals, organizations, and governments internationally. WCAG provides guidelines for websites to ensure that people using accessible technology, especially text-to-speech software such as Job Access with Speech (JAWS), can navigate and understand websites' content. Guidelines address layout, coding, and more. All images in digital content (websites, PDFs, etc.) should also have “alt-text” descriptions so that blind/low-vision persons can understand images' content.

Resource: <https://www.w3.org/WAI/standards-guidelines/wcag/>

Design elements for visually accessible materials

Sans serif fonts —

Left alignment —

Features of an accessible website

While it is essential to select a developer who knows how to build accessibility features into your website, it is also important for you to know what those features should be. Accessibility features allow all users, with and without disabilities, to experience the website fully. To make this possible, the site should provide a variety of ways for users to interact with the content—including visuals and audible/video files. The site should also provide ways for users to move through the pages, and understand the information, including:

Interaction

- › Add alternative text (Alt text) to all images on your website. Alt text is a description of the image or object that allows people using screen readers to understand the content of the graphic.
- › Ensure that you caption videos on your website. Captioning is the process of converting the audio content of a video into text and displaying the text on a screen.
- › Any audible and video files on your site should have transcripts available (printed version of the audio content).

Creating Accessible Websites

- › Avoid using CAPTCHAs to block spam. CAPTCHA stands for Completely Automated Public Turing Test to Tell Computers and Humans Apart. These are often used to weed out spambot comments from human comments. CAPTCHAs are typically images of distorted characters that are not accessible to screen readers; even if there is an audio option, the distorted audio prevents people with some types of disabilities from posting comments.

Operation

- › Define the purpose behind each link on your website to help visitors decide whether they want to follow the link. Hyperlink text should provide a clear description of the link destination, rather than only providing the URL or "click here."
- › Use headings correctly to provide content and structure to your website and to communicate the content's organization on the page. Assistive technologies use them to provide in-page navigation. The most important heading has the rank 1 (<h1>), the least important heading rank 6 (<h6>). Headings with an equal or higher rank start a new section; headings with a lower rank start new subsections that are part of the higher ranked section.

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— Color contrast

— Use of white space

Resource: https://www.vera.org/downloads/publications/print_materials_101617.pdf

Communication Access Real-time Translation (CART), also called open captioning or **real-time** stenography, or simply **real-time** captioning, is the general name of the system that court reporters, closed captioners and voice writers, and others use to convert speech to text. Organizations offering in-person events or webinars can hire CART services for real-time captioning of those events. Captioning for live events can use in-person captioners or an online CART system; services can be found online or through local disability organizations. CART can also be used for meetings, or for interacting with deaf/hard-of-hearing customers one-on-one.

American Sign Language (ASL) is a complete, natural language that has the same linguistic properties as spoken languages, with grammar that differs from English. ASL is expressed by movements of the hands and face. It is the primary language of many North Americans who are Deaf, and many hearing people know how to use ASL as well.

ASL interpreters can be hired to attend events in-person, while video relay services provide off-site ASL interpreters connected through a live video. Video relay services show a live video of an interpreter: the interpreter is usually shown in a bottom corner of a webinar or the corner of a screen at a live event. NOTE: ASL interpreters should be certified. You can find certified ASL interpreters by contacting a local Deaf or hard-of-hearing advocacy organization.

Resource: <https://www.nidcd.nih.gov/health/american-sign-language>

Video Relay Service is a form of Telecommunications Relay Service that enables persons with hearing disabilities who use American Sign Language to communicate with voice telephone users through

video equipment, rather than through typed text. Just like CART, Video Relay can be used for in-person meetings, larger events and webinars.

Resource: <https://www.fcc.gov/consumers/guides/video-relay-services>

Caption Call is a captioning telephone designed to help people with hearing loss use the phone to stay connected with family, friends and colleagues. The phone can also provide a written record of conversations.

Module 4 – CDFI Involvement – Products and Services

Course Overview

CDFIs can provide a range of financial products and services for people with disabilities. CDFIs focus on four basic products and services:

- **Asset Building Strategies** – Supporting Asset Building/Development including 529A (ABLE) Accounts.
- **Assistive Technology** – Lending to Ensuring Access to Assistive Technology.
- **Business Lending** – Expanding Business Development and Employment Opportunities.
- **Housing** – Financing Affordable, Accessible Housing and Community Facilities (housing with supportive services).

This Chapter Presents

The following sections of the manual will give additional details about each of these four products and services, supplementing the material in the PowerPoint presentations. This manual addresses key issues for each of the four products/services:

- A description about the market for each product or service for people with disabilities.
- Loan products developed by existing CDFIs that address each category.
- Loan underwriting standards (where appropriate).
- Technical assistance provided throughout the development process.
- Case studies illustrating each product.

Products and Services Overview

Asset Building Strategies

Asset Building Strategies address key products and issues relevant to CDFIs including financial education, work incentives, employment opportunities and savings products.

Assistive Technology

Assistive Technology (AT) is defined as “any item, piece of equipment or product system, whether acquired commercially, modified or customized, that is used to increase, maintain or improve the functional capabilities of individuals with disabilities. Examples include the following:

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- Mobility aids
 - Cognitive assistance
 - Daily task assistive devices
 - Modifications to a home
 - Modifications to a vehicle
 - Educational assistive devices
 - Devices for people who are deaf or hard-of-hearing
 - Devices for people who are blind or low-vision (See <https://www.nichd.nih.gov/health/topics/rehabtech/conditioninfo/device> for details on each.)

Business Lending

Business lending addresses standard small business loan structures, ones already deployed by CDFIs, and how they can apply to businesses owned by and serving people with disabilities. It also addresses loan products that are customized to entrepreneurs with disabilities and explains alternative underwriting and portfolio considerations.

Housing and Community Facilities

The development of affordable housing by the CDFI industry historically focuses on low and moderate-income families. A key constituency in the low and moderate-income market are people with disabilities. People with disabilities require quality affordable housing and additional supports and services that make it possible to live, work and play in the community. Multiple types of housing options exist for people with disabilities including single family; multi-family and group homes; and housing which includes facilities and programs that provide supportive services.

Module 5 – Asset Building

Course Overview

Historically, means-tested benefits, such as SSI and Medicaid, have stifled opportunities for people with significant disabilities to save and invest. However, there are a variety of provisions within the Social Security Act, Medicaid, tax policy and housing policy to do just that, so long as people have the proper information and guidance. This chapter will orient CDFIs to a variety of mechanisms designed to increase opportunities for saving and financial security, which are positive compliments to CDFI lending strategies. We hope that the information provided will lead to new program innovations and partnerships with disability service organizations.

This Chapter Presents

- Research evidence
- Real and perceived barriers to asset building
- Asset building strategies within current policy
- A framework for braiding inputs and resources to maximize asset building potential
- Themes from prior applied research studies
- Case studies that illustrate the power of leveraging sources and uses for asset building

Asset Building Evidence

CDFIs are encouraged to create or expand asset accumulation strategies as part of their overall product portfolio for the target market segment of people with disabilities in their communities.

Several studies have shown that people with disabilities (PWD) have better health outcomes, housing security, and quality of life when they have access to assets (Hall et al, 2016; Lombe et al 2010; Huang et al 2013; Partch-Davies, 2010).

Results from the American Dream Demonstration (ADD) concluded that low income individuals and families, many of whom access public benefit programs, such as SSI, and Temporary Assistance to Needy Families (TANF), can save money and accumulate assets, if the conditions are right (Sherraden, 2002). ADD results showed that the same is true for people with disabilities (Lombe et al, 2010). Individual Development Account (IDA) holders with disabilities who contributed earned income deposits to a special matched savings program, saved money consistently like other participants. However, their average saving deposits were approximately \$5-\$6 less per month than IDA participants without disabilities (Lombe et al, 2010). Not only did people with disabilities save in IDAs, but IDAs were found to be transformational in securing long-term housing, and most powerful for people with disabilities that prior to their IDA participation were previously unbanked (Huang et al, 2010).

Securing short- and long-term savings is a challenge for many individuals and families who experience disabilities. Research has shown that families with a disabled family member have higher out-of-pocket expenses and lower household incomes than families without disabilities (AARP, 2015). Care-giving supports related to demands on time and resources explain these differences, with personal needs such as transportation, assistive technology, and supplemental educational costs and personal assistance, serving as prime examples. Higher expenses and lower incomes predict fewer resources available for tangible assets, such as home ownership, college, business development or retirement savings.

CDFIs are encouraged to create or expand asset accumulation strategies and partnerships inclusive of persons with disabilities to address these barriers. This guide highlights core model components CDFIs may consider in crafting such initiatives.

Real and Perceived Barriers to Asset Building

For CDFIs to build effective asset building strategies, it is essential to first understand the cultural and financial context that public benefits play in the lives of people with significant disabilities. People with disabilities have life experiences or social attitudes regarding these programs that can ultimately have an impact on CDFIs ability to recruit and retain people in the models they create. In addition, lack of knowledge about such programs and the implications of the products or services provided by CDFIs could result in negative consequences for future customers.

People with significant disabilities often rely on a combination of public benefit programs for their daily support needs. These may include but are not limited to SSI, SSDI Medicaid, Medicare, and other Medicaid related Community Care Waiver services. SSI and SSDI represent sources of cash benefits (income intended to prevent absolute poverty), while Medicaid and Medicare provide a form of insurance for acute and long-term services related to medical and long-term support needs necessary to live in the community. Eligibility for public benefits varies by person and depends on a variety of individual and household characteristics. Thus, what one person accesses in public benefits may be very different from the benefits acquired by the next person.

Means tested benefits such as SSI and Medicaid have asset limitations on the amount of money that a medically eligible individual with disabilities may have during any given month in order to still qualify for either benefit (see the Social Security Red Book – a Guide to Work Incentives, 2019 at <https://www.ssa.gov/redbook/>). For these benefits, eligibility is not merely a medically-based determination, but there is also a financial determination based on earned and unearned income guidelines and financial assets defined by the Social Security Administration (SSA) and Medicaid State Plans.

Medicaid State Plans vary in what is allowable as determined by federal and state law, so what is permitted in one state, may not be applicable in another state. Examples of asset limits include, but are not limited to:

- Owning real estate in excess of more than one primary home;

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- Owning more than one primary vehicle; or
 - Having funds in excess of \$2,000 in liquid assets within a given month.

However, depending on the state, and an individual's age, marital status, history of disability onset, eligibility for SSI or SSDI, work history, and the supports the individual may require, asset limit allowances may be lower or higher. The general rule of thumb is that assets are severely restricted for people who qualify for SSI and Medicaid and do not work. The exceptions to this general rule are special authorized programs that include Special Needs Trusts, Pooled Trusts and ABLE accounts. These programs are administered by Special Needs Trust attorneys, Special Needs Trust administrators and ABLE account administrators. Different rules apply for each program, and not everyone is able or eligible to participate, therefore these professionals must be consulted for more information. More details on each of these provisions are discussed later in this chapter.

The second rule of thumb is that people with disabilities who are eligible for benefits and work are better off financially than those who receive only benefits. Work incentives are special programs designed to reward employment, reduce countable earned income, and allow saving while keeping in place necessary income support and healthcare protections. For them to be effective, individual beneficiaries must carefully follow the eligibility guidelines that apply to their specific benefits. Some work incentives are specific to federal guidelines, while others apply to the state-specific Medicaid State Plan. It is important to note that categories of Medicaid assistance vary by state. What works in one state, or for one individual, may not apply in another state, or for a different individual. Therefore, it is essential that CDFIs become aware of the types of benefits, work incentives, and special savings provisions that apply to their region.

Medicaid is a critical benefit that eligible individuals with disabilities fear losing in the context of pursuing employment, accumulating resources, or making major purchases, such as a home. Medicaid not only provides health insurance for things like going to the doctor, but it also reimburses expenses for direct support services, such as personal care attendants that make it possible to eat, make wheelchair transfers, work, and live in the community. The fear people with disabilities have over the loss of SSI or Medicaid due to earned income or assets being too great, is real. Although it is true that special provisions exist to allow assets to accumulate and to benefit individuals with disabilities, many are unaware of them. In addition, professionals may know they exist, but they may not be technically proficient enough to educate or to help individuals and/or families utilize them. Thus, fear combined with the lack of technical expertise, pose unnecessary barriers to better access and a higher quality of life that could come from employment and the accumulation of such assets.

Given this context, a core component critical to any asset building program offered by CDFIs is access to an experienced cadre of local subject matter experts, including Work Incentive Specialists, ABLE account administrators, and Special Needs Trust administrators. CDFIs are strongly encouraged to explore partnerships and to build information and referral networks with these professionals in their location.

Work Incentive Specialists (WIS) are professionals carefully trained on federal and state public benefit and work incentive programs. WIS professionals provide technical assistance to individual

beneficiaries which allows people to make informed decisions about their employment goals in the context of their needs. Developing a relationship with WIS will ensure members have access to the specialized content expertise needed to navigate the work incentives successfully. In addition, CDFIs will increase their awareness about how to interpret types of income and resources from the standpoint of loan repayment or as a source of equity as these resources will vary by individual customer.

ABLE account professionals work for entities responsible for administering ABLE accounts as contracted by their state or other states in accordance with the ABLE Act and consistent with the Internal Revenue Service and the U.S. Department of the Treasury. Of special note is the specific language identifying CDFIs as eligible entities for administering ABLE accounts. However, if a CDFI is not an ABLE account administrator, they are encouraged to consider serving in this capacity. Alternatively, CDFIs are encouraged to establish partnerships with their state or the ABLE account administrators in their region. Developing relationships with said entities will ensure distributions made or leveraged in conjunction with CDFI products on behalf of the beneficiary are qualified disability related expenses. In addition, the CDFI may be in a unique position to blend and braid resources such as grants and deposits into ABLE accounts on behalf of beneficiaries for qualified disability-related expenses and which could potentially be used for asset building purposes.

Special Needs Trust (SNT) administrators are professionals appointed in Special Needs Trusts responsible for making qualified trust disbursements on behalf of the beneficiary and consistent with applicable federal and state laws. Trust administrators are subject matter experts in federal and state public benefit programs, asset limit interpretations and pay-back and look-back considerations. Having access to SNT professionals will assist CDFIs in projecting targeted needs for particular types of housing or other needs represented in their community finance or real-estate portfolio; leveraging sources of equity and finance products to benefit persons with disabilities.

Each of these professionals are key subject matter experts that will benefit the work of CDFIs in addressing the underserved needs of persons with disabilities. Listed below are key points of transition when it is important for individuals with disabilities, and possibly CDFI professionals, to consult one or more of the identified subject matter experts:

- contemplating employment;
- changing employment and/or anticipation of major gifts or settlements/bequeaths; and,
- structuring resources for major purchases.

These important points of transition are detailed more below.

Contemplating employment: A common problem experienced by people with disabilities and/or their families is the daunting application process for disability benefits and Medicaid. Gathering the medical evidence required, as well as the financial documentation needed to determine eligibility, is time consuming and burdensome. Additionally, the wait period for eligibility determinations can take months or longer. Once determined eligible for benefits, individuals are required to go through re-

determination on an annual basis, even if nothing has changed related to their status. Because this process can be so time-consuming and full of hassles, many individuals and families are afraid to jeopardize benefits and instead forego employment. However, as discussed earlier, people with disabilities are financially better off when working and maintaining benefits they need to work. In fact, some people work themselves off benefits altogether. Therefore, it is critical for individuals to consult with a WIS soon after qualifying for benefits.

This will help ensure they are aware of the many work incentives that exist to support their future goals and interests and improve their financial well-being and quality of life.

Changes in employment or financial status: If there are changes to the household, or changes in financial status, such as with earned or unearned income or assets, these changes must get reported promptly to SSI and Medicaid. When an individual begins a job, the place of employment, anticipated hours and wages, must be reported to SSA within a 10-day period. Lack of timely and technically proficient guidance can lead to overpayments from SSI and/or SSDI. An influx of earned and unearned income and assets, if not protected through “work incentives” or allowable savings programs, such as an ABLE account or trust, may result in termination of benefits. In some cases, failure to adhere to reporting requirements will lead to pay-back requirements; and worse, accusations of SSI or Medicaid fraud. Asset transfers from an injury or death benefit may prompt “look-back” and “pay-back” provisions within state Medicaid programs, and can affect how resources are interpreted and/or protected to benefit a person. Changes in employment status should prompt a consult with a Work Incentive Specialist to activate work incentives and employment reporting to public benefit agencies. In addition, the individual may qualify for an ABLE account, and with increased earnings make it possible to make deposits from their earned income into an ABLE. Asset transfers, death benefits or long-term needs related to estate planning may prompt a consult to an SNT administrator.

Structuring resources for major purchases: Major purchases including a home, a modified van, business start-up and other capital equipment and more. Each of these purchases and others are cases in which subject matter experts may apply. It depends on the individual, which benefits they receive, their current assets, and what provisions are put in place to protect the assets to benefit the person with disabilities. Knowledge about source of income, sources and uses of equity for purchases, and subject matter expertise available to both the beneficiary and the CDFI are important components. Who to consult with will depend upon the situation at hand and the client’s circumstances/perspective/needs.

It is important for people with disabilities and their families to have confidence in important public benefit and healthcare protections. After all, in the absence of wealth, these supports are the primary safety-net to ensure that people have access to what they need to live in the community. Navigating eligibility policy and procedures, as well as reporting complex requirements for these basic needs is daunting. The process can compound the fear and anxiety among individuals and families about the potential loss of benefits due to work or participation in financial self-sufficiency programs. CDFIs need to build partnerships with technical experts to ensure that any CDFI intervention will not compromise existing benefits or programs that serve people with disabilities.

Financial Literacy

Financial literacy for people with disabilities include the universal components that CDFIs provide, including short- and long-term goal setting, household budgeting, saving and spending plans, credit checks and credit-building strategies, and identify theft and scam protections. What is unique for customers with disabilities is the interaction their finances have with public benefit programs; how well the individual self-advocates; the level family members and/or third parties influence decision-making; and, the degree to which the individual has control over income and expenses from a behavioral or structural standpoint (i.e. spending impulse, housing market). Although financial literacy and the management of personal finances is often an educational target during “transition” for young adults preparing for life after high school, an adult who experienced disability onset later in life must relinquish control over finances to custodians during a medical crisis or recovery.

Unlike the general population, many entities can be involved in the governance of the finances of a person with disabilities life at any given time. At the extreme, entities may include family members, such as parents, guardians or Representative Payees (if applicable); advocates; case/service coordinators who track eligibility and redetermination for billable services; the federal and state government for means tests and asset limits; and other interested parties customary to the general population, both good and bad (i.e. creditors, credit bureaus, scammers). In summary, the extent to which people with disabilities have access to financial information, personal financial management opportunities and the ability to control informed financial decision-making, is highly variable and depends on the individual and context.

Government entities are sometimes necessary to engage for financial support and services. Doing so affects household income, documentation and reporting requirements for the various agencies that may play a role in providing income or subsidies, and the link to securing acute and long-term health care for the individual. Life course changes can have an impact on such benefits, including income shocks, asset tests and variability in cash flow that affects financial security if not planned thoughtfully with guidance from a technical expert, and accurate and timely reporting. The more an individual is aware of, and prepared to adhere to, the policies and procedures and the interactions between public benefits, employment, and savings, the more financially sound and capable the individual will be in leveraging the opportunities available for an enhanced quality of life.

CDFIs are encouraged to partner with Work Incentive Specialist Advocates (WISA) – individuals who have been certified to provide work incentives counseling services to clients who are receiving Social Security Disability (SSDI) and/or Supplemental Security Income (SSI) benefits – to make informed decisions about work for people who have disabilities and receive public or private benefits. CDFIs are also encouraged to partner with other disability organizations within the communities they serve to advise on the individual technical assistance needs of a given customer eligible for public benefits. The specialist will have knowledge about the asset limits that apply, as well as the treatment of loan funds that may apply to asset limitations. In addition, the specialist, if agreeable, could serve as an advisor to CDFI product designs and implementation plans.

Listed below are links to resources on financial literacy and financial management, including information about public benefit programs and work incentives; banking characteristics of people with disabilities; as well as financial education toolkits designed specifically for this market segment.

- Social Security Benefits and Work Incentives for SSI and SSDI:
<https://www.ssa.gov/redbook/documents/TheRedBook2018.pdf>
- Medicaid-This is state specific. Inquire with your state or county officials.
- Public housing/subsidized housing resources:
https://www.hud.gov/sites/documents/FSSFACTSHEET_FEB2016.PDF
- Banking characteristics of People with Disabilities: <https://www.usfinancialcapability.org/>
- Financial education resources for people with disabilities: Your Money, Your Goals-Focus on People with Disabilities: https://www.consumerfinance.gov/practitioner-resources/your-money-your-goals/companion-guides/#anchor_disabilities
- FDIC's Money Smart resources that include examples of people with disabilities:
<https://www.fdic.gov/consumers/consumer/moneysmart/adult.html>

Employment and Work Incentives

Earned income from employment is typically better for people with disabilities than surviving solely from what is considered unearned income from SSI or SSDI. Although wages from employment cause reductions in SSI cash amounts (even more variable if hours or wages fluctuate each week), work incentives exist to allow workers to keep more of their earnings, while maintaining eligibility for important healthcare protections.

Most importantly, labor force participation affords the opportunity for people with disabilities to contribute their talents. Work is a part of the social fabric of American culture and personal identity; contributing knowledge, skills, talents and artistry promotes an inclusive society and reduces income and social disparity. Promoting and expanding inclusive workforce investments that pay livable wages, fringe benefits, and re-invest in local communities promote a more diverse and equitable culture in CDFI investments.

Participating in the labor force opens opportunities for other important employment benefits to people with disabilities. Employer-sponsored Employee Assistance Programs (EAPs), tuition benefits, retirement and profit-sharing, vacation and sick time, and social networks that come from being included in the workplace are all highly beneficial to people with disabilities.

Listed below is a table of work incentives that may apply to a person with a disability eligible for SSI or SSDI. The work incentives referenced for the SSI and SSDI are federal programs. Additionally, Medicaid State Plan amendments, such as the Medicaid Buy-In program, allows individuals to work

and access Medicaid on a premium basis, as a work incentive. The Social Security Red Book can be consulted for more information, but the best source for technical assistance includes the Work Incentive Specialist in your area. Please see the following work incentives by program type below.

Work Incentive		
Earned Income Exclusion	X	X
Student Earned Income Exclusion	X	X
Work-Related Subsidies	X	X
Impairment-Related Work Expenses	X	X
Plan to Achieve Self-Support (PASS)	X	X
Property Essential for Self-Support	X	
Ticket to Work	X	X
Expedited Reinstatement		X
Trial Work Period (TWP)		X
Extended Period of Eligibility (EPE)		X

Table 1: Work Incentives Programs

Medicaid eligibility is linked to federal SSI eligibility for persons with disabilities. Medicaid has its own set of work incentives, including 1619 (a), which allows people to continue receiving cash benefits from the SSI program and maintain healthcare coverage. 1619 (b) is also available in the Medicaid program for people who work and earn too much to qualify for SSI, but still affords Medicaid eligibility. In addition, many states have Medicaid Buy-In programs that allow people who work and earn too much to qualify for cash benefits to still qualify for health insurance from the Medicaid program for a monthly premium they must buy into from wages. Some states have added provisions that increase asset limits associated with Medicaid Buy-In programs and allow people to save money from earnings for “independence building” or “retirement savings.” CDFIs are encouraged to create and expand inclusive workforce development opportunities for people with disabilities. Addressing underemployment by promoting economic development is foundational to individuals with disabilities utilizing asset building strategies and enhancing their quality of life. This may allow unique opportunities for CDFIs to blend and braid resources into ABLE accounts or other products to improve financial well-being.

For more information about the work incentives that exist for people who access SSI or SSDI, and 1619 (a) or (b), refer to the Red Book.

For a listing of state specific Medicaid Buy-In programs, visit the Kaiser Family Foundation: <https://www.kff.org/other/state-indicator/medicaid-eligibility-through-buy-in-programs-for-working-people-with-disabilities/?currentTimeframe=0&sortModel=%7B%22colId%22:%22Location%22,%22sort%22:%22asc%22%7D>

Asset Building Strategies

Public benefit programs allow for savings programs that are restricted based on age and public benefit eligibility, employment status, and housing and tax factors. The descriptions below

summarize these resources and provide links to subject matter experts and more information. The savings and tax eligibility credits discussed include:

- ABLE accounts
- Special Needs Trusts and Pooled Trusts
- Individual Development Accounts
- Section 8 Financial Self Sufficiency Program
- Medicaid Buy-In Program

ABLE Accounts

The Achieving a Better Life Experience (ABLE) Act was passed in 2014 and for the first time acknowledges in federal law that the cost of living for persons with disabilities are higher than the general population without a disability. This legislation allows people with significant disabilities who meet certain eligibility guidelines to save their own money above and beyond SSI or Medicaid asset limits, as well as receive contributions to their accounts from others, such as from family and friends, to benefit their quality of life. Moreover, ABLE savings will not disqualify beneficiaries from important SSI, Medicaid, Supplemental Nutritional Assistance Programs (SNAP) or subsidized housing programs.

To qualify, disability onset or blindness must have occurred prior to the age 26. If the person is already eligible for SSI, SSDI or Medicaid, the individual can automatically enroll in the program. If age criteria are met but the person is not determined eligible for public benefits, a letter from a physician verifying significant functional limitations consistent with Social Security's definition may qualify the person for ABLE. Only one ABLE account is allowed per beneficiary.

With ABLE accounts, unlike trusts, the beneficiary is the owner of the account. Contributions in ABLE accounts are subject to state law and limitations to 529 savings accounts. Accounts are opened with authorized ABLE account administrators appointed by State Treasury departments.

ABLE accounts can accumulate savings of up to \$15,000 per tax year, with a limit of \$100,000 per plan without suspending the account holder from SSI cash benefit eligibility (if applicable). Contributions to the account can be made by the individual owner of the account, family or friends. If the individual works, some or all of their earned income can be deposited into the ABLE account (special IRS provision allowing deposits to exceed the \$15,000 annual limit). *Income earned on the account is not taxed; however, contributions made to the account are not tax deductible.*

The intent of the federal legislation is for ABLE accounts to “supplement” benefits but not replace public benefits. Funds accessed from ABLE accounts must be used toward “qualified disability related expenses”. Examples of such qualified disability-related expenses include the following:

- Education
- Housing

-
- Transportation
 - Employment and training
 - Assistive technology
 - Health and wellness
 - Personal support services
 - Financial management
 - Legal assistance
 - Others

ABLE account legislation is relatively new, and not all states have an ABLE account administrator. However, individuals and families are able to use ABLE accounts administered by their own state, in accordance with IRS policy. Alternatively, other entities, can accept eligible account holders so long they are transacting ABLE business on behalf of the home state, and are under contract by the state. If your CDFI does not have an ABLE account administrator under contract, consider becoming one of them! ABLE accounts offer important protections to allow savings to grow and benefit eligible individuals with disabilities without jeopardizing eligibility for important public benefit programs.

ABLE accounts are one of many potential sources of potential equity that can be leveraged alongside CDFI lending products financially feasible for asset ownership. In addition, CDFIs may be able to procure grants or combine with other asset building programs in order to increase contributions or other aims.

- ABLE National Resource Center: <https://www.ablenrc.org/>
- ABLE Tax Reform: <https://www.irs.gov/newsroom/tax-reform-allows-people-with-disabilities-to-put-more-money-into-able-accounts-expands-eligibility-for-savers-credit>

Special Needs Trusts

Trusts are special approved savings programs that allow contributions to be made on behalf of a beneficiary with disabilities. Trusts are not to replace public benefits, but to enhance the individual's quality of life. There are several types of trusts:

- Self-Settled Special Needs Trust (SNT), often due to a personal-injury settlement
- Third-party SNT, created by a family member for the sole benefit of the individual beneficiary
- Pooled Trust

SNTs are created through the legal assistance of a qualified Special Needs Trust attorney and *are not owned by an individual beneficiary*, but rather are managed by a third-party trustee. A *Pooled Trust* works similarly to that of a SNT but requires fewer, if any, legal fees, and are less expensive to have administered since the funds from multiple individuals are pooled to facilitate increased investment earnings.

Qualified trust expenses can be applied toward a variety of disability-related expenditures but must exclude food and shelter related expenses as they are considered “in-kind support and maintenance” and will otherwise reduce SSI cash payments. Similarly, funds transferred directly to the individual count as “unearned” income and may affect SSI/Medicaid eligibility. Examples of In-Kind Support and Maintenance expenses *that trusts should avoid so as not disqualify individuals from SSI reductions or Medicaid eligibility*, include the following: food, mortgage, property insurance, rent, heating fuel, gas, electricity, water, sewer and garbage.

Examples of qualified disability-related trust disbursements include gym memberships, one automobile, health, prevention and wellness services, home purchase, pet and pet supplies, primary/specialist medical care and dental work not covered by Medicaid, recreational activities and athletic equipment, counseling, furniture, and more.

Note: Certain trust “pay-back” provisions may apply that require funds to be reimbursed to Medicaid. Funds established by private resources from families are not subject to payback provisions.

Individual Development Accounts

The Assets for Independence Act (AFIA) was an important federal demonstration project the results of which proved that low- and moderate-income families can save and access transformational assets, including but not limited to home ownership, college and business. In years past, the Act had dedicated dollars to match to private savings and matching formulas. Although effective, this Act is no longer in effect. However, important lessons were learned about the positive impact that IDAs made to encourage employment and to facilitate household savings and creditworthiness, which lead to ownership of assets. It is worth referencing that within existing laws for persons with disabilities, there are mechanisms to promote matched savings because of employment. CDFIs are encouraged to explore work incentives and ABLE accounts as mechanisms to innovate new IDAs specific to people with disabilities through existing, allowable procedures.

Section 8 Family Self Sufficiency Program

The Section 8 Financial Self-Sufficiency (FSS) Program, available through the U.S. Department of Housing and Urban Development (HUD) and participating housing authorities, is a form of subsidized housing for whom people with disabilities sometimes qualify. The program has key enhancements that buffer rental costs, which would otherwise make rents unaffordable while an individual or family is trying to establish their entry into the workforce and increase their income. In addition, the program promotes asset building through the development of restricted escrow accounts. Escrow accounts are mechanisms in HUD policy and the FSS program that allow residents and voucher beneficiaries to set aside what would be the subsidy lost due to increases in earned income from

housing vouchers into a saving set-aside for goods and services needed to become more financially independent. Examples include car repairs, or employment and training expenses.

In this program, HUD-assisted families establish an Individual Training and Services Plan (ITSP) to increase earned income and reduce dependency on rental subsidies. The plan addresses short- and long-term goals for self-sufficiency. An added incentive is that the earned income from wages is deposited into a time-limited escrow account, reducing countable income by HUD and effectively waiving it from determining rental subsidies. At the conclusion of the program, the funds in the escrow are available to the individual and/or family.

The anticipated outcome is that people who complete the program will be capable of paying market rate rent as a result of increased labor participation.

For more information about the Section 8 Family Self Sufficiency Program, visit:

<https://www.hudexchange.info/trainings/fss-program-online-training/1.2-what-is-fss.html> and:
https://www.hud.gov/sites/documents/FSSFACTSHEET_FEB2016.PDF

Asset Building Strategies-Tax Credits

Tax credits available within the Internal Revenue Service (IRS) code are another frequently untapped resource among people with disabilities that can be utilized for enhanced financial security or for the purpose of asset building. Different eligibility guidelines apply for each tax credit and tax policy can change annually, therefore it is important to consult the IRS.gov website and to seek services from a qualified tax professional for the most accurate information.

People with disabilities are responsible for filing their taxes just as any other citizen on an annual basis. Whether an individual with disabilities is eligible for a tax refund depends on their filing status, dependents, income, disability, household characteristics and expenditures that may apply to one or more tax benefits.

Tax benefits that may apply to people with disabilities include, but are not limited to:

- Increased standard deduction
- Earned Income Tax Credit (EITC)
- Medical and dental expenses
- Credit for elderly and disabled
- Other special credits, deductions or income exclusions that may apply

ABLE-designated beneficiaries may also claim the Saver's Credit for contributions made to the ABLE account. These are a short list of tax benefits available, but other tax credits or considerations may also be available depending on the household situation.

Volunteer Income Tax Assistance (VITA) sites and American Association of Retired Persons (AARP) Tax Aide programs are available to provide free, qualified tax preparation assistance to low- and moderate-income individuals with disabilities. Telephone assistance is available for people who are deaf and hard of hearing through TTY/TDD equipment. Tax preparers at these sites undergo extensive training each year and federal audit reports repeatedly indicate low error rates on prepared returns. Tax returns are submitted electronically, allowing eligible filers to receive their refund back promptly and avoid having to pay for tax preparation software or high cost professional services. In addition, accessing a VITA or Tax Counseling for the Elderly (TCE) site diverts people away from falling into the trap of high cost products known as Refund Anticipation Loans (RALs), or Refund Anticipation Checks (RACs) which are largely targeted to people in need of cash immediately, or are unbanked and without an account for electronic IRS refunds to be deposited.

CDFIs are encouraged to partner with VITA and American Association of Retired Persons (AARP) CE sites and disability organizations for the purpose of assisting people with disabilities in accessing important tax benefits. Tax refunds are yet another example of a source of equity that may be leveraged with loan products to make asset acquisition financially feasible. Special note: Care must be taken in referring individuals with disabilities to tax preparation services. Depending on the household situation, the individual may be a dependent on a parent's tax return, which would affect their tax status and filing requirements.

- For more information, please visit the IRS website for disability-related tax credits:
<https://www.irs.gov/individuals/more-information--people-with-disabilities>
- VITA and AARP Tax Aide services: <https://www.irs.gov/individuals/free-tax-return-preparation-for-you-by-volunteers>
- Tax implications for ABLE account owners with disabilities:
<https://www.irs.gov/government-entities/federal-state-local-governments/able-accounts-tax-benefit-for-people-with-disabilities>

Case Study

Illustrated below is a case study of a young couple with developmental disabilities who accessed a variety of work incentive programs to make it possible to reach several financial goals. In identifying financial goals, a household budget was established along with technical assistance from a Work incentive Specialist to utilize a variety of resources to fulfill the couple's goals.

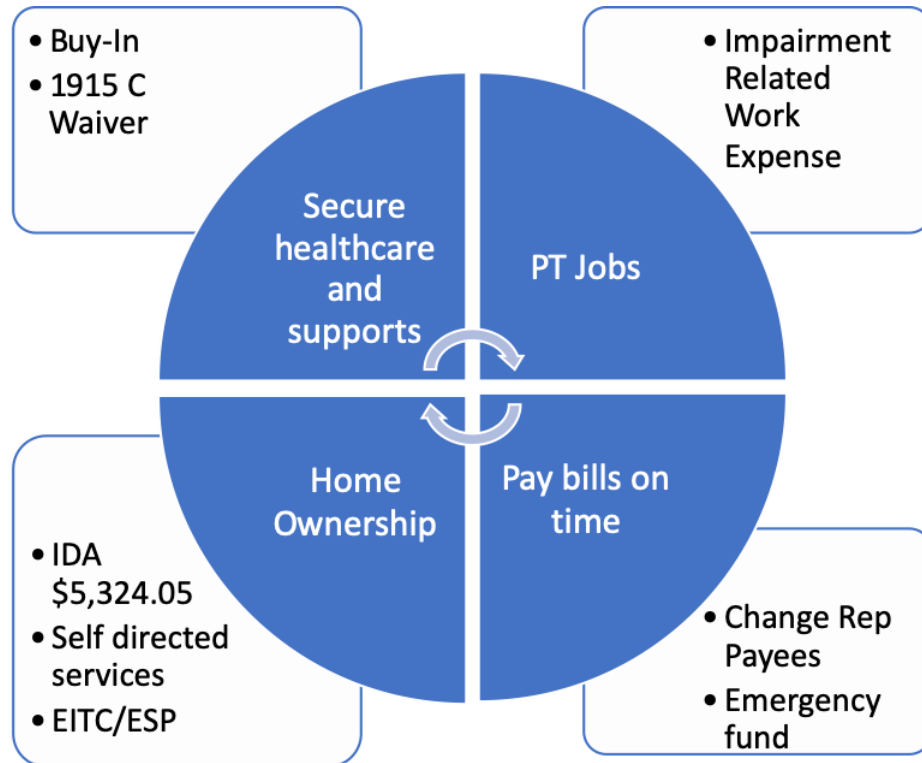
These include:

- Employment
- Maintenance of Medicaid for long-term support needs
- Accessing Individual Development Accounts

- Earned Income Credit
- Impairment Related Work Expenses to reduce out of pocket expenses for transportation

In addition, an emergency housing fund was established, along with changing the Representative Payee so that the couple had more choice and control over their life goals and plans.

Example:



Module 6 – Assistive Technology (AT)

Course Overview

CDFIs can serve people with disabilities in a variety of ways. The material presented here focuses on meeting the need for Assistive Technology (AT) through financing and other financial capability services.

This Chapter Presents

This manual provides a more in-depth look at various types of AT and how the lives of people with disabilities are positively impacted and even transformed by advances in technology that help them live freer and more fulfilled lives when they can afford those advancements.

Assistive Technology (AT)

What is AT?

“Any item, piece of equipment or product system, whether acquired commercially, off-the-shelf, modified or customized, that is used to increase, maintain, or improve functional capabilities of individuals with disabilities.” (definition from the Assistive Technology Act of 1998.)

The term “**assistive technology**” refers to the various low- and high-tech devices used by individuals with disabilities to maintain or enhance functional capabilities. Examples include adaptive computer technology with Braille, speech or large print output used by individuals who are blind or are low-vision, wheelchair-accessible vans and vehicles with modified driving controls, hearing aids, telecommunications devices for individuals who are Deaf, wheelchairs, augmentative communication devices for individuals with speech disabilities, specialized beds and even home modifications such as ramps, bathroom accessibility, etc. AT also includes the services needed to make effective use of AT such as assessments to assist with the selection of appropriate AT, training, maintenance, and repair. The definition is intentionally broad to help ensure the inclusion of new technologies and capture the breadth of disabilities.

The Need

Who needs AT?

It can be easy to understand the need for assistive technology, such as a wheelchair, for people who have difficulty walking. The population with disabilities in need of assistive technology also includes people with:

- Noncommunicable diseases such as diabetes and stroke
- Sensory loss such as vision or hearing

-
- Cognitive and intellectual difficulties
 - Mental health conditions including dementia and autism
 - Gradual functional decline (to include the elderly)
 - Assistive technology enables people to live healthy, productive, independent, and dignified lives, and to participate in education, the labor market and civic life. Assistive technology reduces the need for formal health and support services, long-term care and the work of caregivers. Without assistive technology, people are often excluded, isolated, and locked into poverty, thereby increasing the impact of disease and disability on a person, their family, and society.
 - As new AT technologies come online, opportunities for increased functionality and quality of life keep growing. The challenge becomes finding the “right” technology and finding a way to acquire the technology. As referenced earlier in this workbook, those with disabilities often lack access to financial resources. For example, workers with disabilities with at least a high school education on average earn 37% less than peers without disabilities, according to a 2014 American Institutes for Research (AIR) analysis. Yet, more than 40% of all assistive technology is purchased by individuals using personal or family resources because insurance, philanthropic, or public resources are not available or do not fully cover the cost (Carlson, et al. 2002). Up to 70% of people with disabilities pay out of their own pocket for high-tech and high-cost AT (Carlson and Ehrlich 2006). 80% of homeowners need to finance home modifications themselves (AARP Public Policy Institute 2010a). There is a clear need for affordable financial products and programs to meet the needs of the disability community to obtain AT.
 - Home modifications are one type of AT that is increasingly in demand with the aging of our population since the incidence of disability increases with age; people 65 years and older are by far the most likely to live with a disability. The CDC estimates that 40% of elderly Americans have a disability and as our population’s average age continues rising, the number of elderly Americans with a disability will increase. The vast majority of older adults prefer to remain in their home indefinitely (AARP Public Policy Institute 2010), and home environment modifications to accommodate mobility related and other disabilities are

among the most important factors supporting aging in place (Hwang et al. 2011). Simple modifications such as handrails and grab bars and more complex additions including installing ramps and widening doorways are fundamental in continuing an individual's ability to complete everyday tasks and maintain independence, including entering and exiting a home and performing self-care in the bathroom (Peterson et al. 2008). Studies also have demonstrated that those living with environmental adaptations have slower declines and less difficulty in completing everyday tasks (Peterson et al. 2009). For many people, home modifications are the difference between staying in their home and having to move into a supported-living facility.

AT Improves Lives

The myriad of ways AT improves lives through increased functionality is as incalculable as it is undeniable. AT affords people with disabilities greater participation in work, play, social interactions, and basic self-determination. People with disabilities have unique needs for AT – hearing aids, computers, modified vehicles, etc. – to pursue employment/education, gain and maintain independence and live an enriched daily life. AT allows people with disabilities mobility, employment, independence, and opportunities for a full and meaningful life. Some typical assistive technology devices are presented in the table below.

Assistive Technology	Examples
Mobility aids	Wheelchairs, scooters, walkers, canes, crutches, prosthetic devices, and orthotic devices
Cognitive assistance	Computers, software providing multi-sensory output, and electrical assistive devices providing auditory feedback or cueing and memory aids
Daily task assistive devices	Kitchen implements, dressing aids, smart home devices, and medication dispensers with alarms
Modifications to a home	Wider doors, ramps, lower countertops, barrier-free showers and grab bars in bathrooms
Modifications to a vehicle	Adjustable foot pedals, wide doors, ramps, lowered floors, tie-downs, large door handles, and dashboard-mounted ignition
Educational assistive devices	Automatic page turners, recorders, book holders, speech recognition software
Devices for people who are deaf or hard-of-hearing	Hearing aids, closed captioning, software, and visual alarms, smart phones, bed shakers, smart home devices.

The National Institute of Child Health and Human Development at the U.S. Department of Health and Human Services states that "... assistive technology enables students with disabilities to compensate

for certain impairments. This specialized technology promotes independence and decreases the need for other support.”

Assistive technology can enable individuals to:

- Care for themselves and their families
- Work
- Learn in typical school environments and other educational institutions
- Enjoy music, sports, travel and the arts
- Participate fully in community life

Acquiring AT to increase functionality offers the prospect of leading a life propelled by one’s abilities rather than being held back by one’s disabilities.

Factors inhibiting acquisition of AT

People with disabilities are more likely to be low-income, as discussed earlier. Because of limited income they may not have a credit card, they may have credit cards but with very high interest rates, they often cannot meet traditional financial institution loan standards, and they are more likely to seek loans from payday lenders.

Barriers to employment, education and community integration have led to people with disabilities being low-income and unable to finance the AT that can improve their lives. National research shows economic and social circumstances affecting people with disabilities that can lessen the ability to purchase AT:

- People with disabilities make up 47% of those in poverty when using an annual measure of poverty, and 65% of those in poverty using a long-term measure (She and Livermore 2009).
- For people with disabilities, the National Labor Force Participation rate is one-quarter that of people without disabilities (19.5% vs. 82%), and the unemployment rate is more than twice the rate for people without disabilities (12.5% vs. 4.9 %) (USDOL 2016 DES).
- People with disabilities have less overall financial capability compared to other Americans – they are: less likely to have received financial education, to plan ahead, and to have “good debt”(asset-building debt); and more likely to borrow from non-bank sources, carry interest accruing credit card balances, and to have “bad debt”(asset-sapping debt such as predatory loans) (National Disability Institute, N. Conroy et al. 2014).

Additionally:

- Many individuals are not able to draw from home equity to fund home modifications, because banks can see modifications as detracting from a home's value. Further, many people with disabilities may have negative home equity, and/or high debt-to-income ratio.
- High medical debt among those with disabilities can lead to denial of a request for a loan to finance AT from traditional lenders even when income is adequate to pay off the loan.
- Many people with disabilities access government programs that provide crucial supports, such as Supplemental Security Income (SSI), which restrict their ability to save for AT.

People on SSI are penalized if their savings exceed the following limits: \$2,000 for an individual or \$3,000 for a couple.

As mentioned earlier, more than 40% of all assistive technology is purchased by individuals using personal or family resources and up to 70% of people with disabilities pay out of their own pocket for high-tech and high-cost AT. Cost is the main factor limiting acquisition of AT among those who cannot get the AT they need through insurance, philanthropic or government resources. However, it is not just the cost of the AT, it is also the cost of credit that is a barrier. Since people with disabilities are among the nation's most economically and socially vulnerable, they need access to financial capability services, affordable asset-building programs, and low-cost loans that CDFIs can provide to purchase AT and achieve greater independence.

AT Financing

Costs associated with procuring AT go beyond the price of the AT product. People with disabilities also often need support in the evaluation, selection, and use of the technology. They also need technology training that is targeted/relevant to their specific disabilities and the device selected. Off-the-shelf technologies may need to be adapted to an individual. Often useful products are not readily available, and the AT needed has to be designed and constructed to suit the individual with a disability. Repair of a product can also be costly.

Like other populations, people with disabilities benefit from low-cost financing options and often need financial counseling and saving incentives. Individual Development Accounts (IDAs) and financial capability services such as credit builder programs can help those who are not good candidates for a loan become "loan ready." Many CDFIs offer these services already. People with disabilities have many of the financial characteristics of other targeted populations served by CDFIs. How can CDFIs meet the need for low-cost loans and development services to help people with disabilities get the AT they need? In many cases it will require the adaptation of existing programs and, as suggested earlier in this workbook, coordinating efforts with those already serving individuals with disabilities.

Among those serving people with disabilities are the Alternative Financing Programs (AFPs) which are federally funded programs that provide affordable financing options for the purchase of assistive technology devices and services. They typically provide lower interest rates and more favorable loan terms for people with disabilities and their family members. In addition, Telework program loans can be tailored specifically for employment options. Not every state has one of these programs yet, so check below to see if yours does and contact them for more information. According to the Pennsylvania Assistive Technology Foundation (PATF), there are 43 Alternative Financing Programs (AFPs) in the U.S. and its territories that help people with disabilities obtain the AT they need. (<https://patf.us/wp-content/uploads/2019/10/Alternative-Financing-Programs-List-October-2019.pdf>) These programs offer consumer loans to people with disabilities via direct lending as well as via credit broker contracts and loan guarantees in cooperation with banks and credit unions. The loans may be secured or unsecured and are generally low interest with low to no fees. Credit building loans are available from many of the AFPs, often in association with financial coaching and financial education. A few programs offer interest buy-down loans which can be used to lower the cost of a loan for AT and home equity loans which can be used for AT-related home modifications. Since most states have an AFP, CDFIs that are interested in helping people with disabilities acquire AT would be well-served to identify and touch base with the AFP serving their area.

Six of the certified AFPs in the US are also CDFIs. Information on four of these organizations, which may serve as models for other CDFIs seeking to serve the disability community, is in the next section.

CDFIs Meeting the Need for AT Financing and Other Services for People with Disabilities

Northwest Access Fund

Northwest Access Fund (NWAFF) loan products and services are designed to meet the needs of PWD in Oregon and Washington – and help borrowers achieve financial and personal success. Three loan products are offered as well as an array of development services that lead to significant impact and economic opportunity in clients' lives – including increased access to affordable capital, increased income, and increased assets.

Many NWAFF clients have very low income so loan products must be affordable. The interest rate on all loans is 5% with no origination fees. Loan terms are up to 60 months to keep payments low and fit the budget of the borrower.

Consumer AT Loans

The average loan amount has been just over \$5K. Loan proceeds are used to purchase AT devices and services to increase, maintain, or improve functional capabilities for an individual with disabilities. According to 2016 Social Security Administration data, 14% of people with disabilities in Oregon and Washington are recipients of Supplemental Security Income (SSI). Benefits are at risk if a recipient exceeds saving limits. A low-cost loan provides clients the AT they need without jeopardizing SSI benefits that cover living and medical expenses.

Credit Builder Loans

These are useful to clients with poor credit histories as a result of economic challenges. These loans are up to \$500 and are designed for applicants of consumer or microenterprise loans who do not qualify because of credit history. Credit builder loans are intended to help applicants build or rebuild credit, eventually allowing them to purchase needed AT or business equipment. Borrowers are required to complete financial capability training and create a money management plan.

Microenterprise Loans

Loan proceeds may be used for Assistive Technology needed by people with disabilities to operate a business as well as business equipment. A business plan is required. These loans are designed to help people with disabilities increase their income through self-employment and by pursuing activities they may be passionate about. For many clients it is their only opportunity for employment due to their disability.

Development Services

NWAF offers several services to help build the financial capacity of borrowers. Services are designed to help create successful borrowers and include financial capability training, small business planning, one-on-one financial and business TA, and an IDA program.

Financial capability training includes financial well-being assessments, financial counseling, and financial education courses. Assessments help NWAF understand how they can best help clients. Financial capability training helps clients build the financial skills they need to develop a path to financial security. Once the client's credit has improved, they are better able to obtain a loan to finance AT equipment.

For entrepreneurs with disabilities, NWAF offers assistance in starting or expanding a business. This includes individual counseling and a seven-week business planning course. They also cover business issues particular to those with disabilities such as SSI benefits and work incentives. This training helps clients qualify for a microenterprise loan.

One-on-one TA is provided to address clients' specific financial and AT needs. This TA includes credit coaching, budgeting, and advice and referrals relating to a client's specific AT needs. NWAF also helps clients navigate the maze of rules associated with disability and medical benefits.

NWAF's Individual Development Account (IDA) program offers a mechanism to save for AT for very low-income borrowers. It is exempt from SSI savings limits making it an option for many AT clients. It can also be used to leverage a consumer or microenterprise loan. Enrollment is limited to individuals with incomes < 80% AMI. A client can save up to \$4K for up to three years. After attending required financial and asset-specific education (such as business training), clients' savings are matched dollar-for-dollar. Funds are then used to purchase AT or business equipment.

Self-Help Credit Union

Self-Help is a CDFI in North Carolina founded in 1980 with a mission of creating and protecting economic opportunity for all. In 2015, Self-Help began an AT financing program after learning that NC was one of the few states that did not have one. In 2017, Self-Help became an AFP and was awarded \$665,000 in federal funding from the U.S. Department of Health and Human Services' Administration for Community Living to help subsidize the financing of AT loans and to formally engage the NC Assistive Technology (NCAT) Program as partners. They have used the funding to create a "share secured" revolving loan fund and make all AT loans (whether hearing aids, vehicle mods, home up-fits, etc.) at a 4% interest rate with no closing costs and expand underwriting standards. They also work in partnership with the NCAT Program for their referral work and expertise in helping people determine what device is most appropriate for their needs and to help protect people from buying overly expensive or unnecessary devices.

As a full-service credit union, Self-Help can fund various types of AT loans. Under Self-Help's AT loan program:

- Persons with any disability or their family members are eligible to apply for financing
- State of North Carolina and Medicaid assistive technology restrictions do not apply
- Rates are generally at 4% with no origination fees and flexible underwriting
- There is no minimum or maximum loan size
- Applicants must visit a branch once the financing is approved
- Credit counseling and credit building loans are also available

In 2018/19, Self-Help partnered with Disability Rights NC, North Carolina Agricultural and Technical State University, and other organizations to raise community awareness about the availability of disability services in general and their loan products. Self-Help is now considering how to expand its AT program to states where it has credit union operations in addition to North Carolina.

Pennsylvania Assistive Technology Foundation (PATF)

Pennsylvania Assistive Technology Foundation (PATF) is a statewide, non-profit organization that helps individuals with disabilities and older Pennsylvanians acquire the assistive technology devices and services they want. PATF is a state and federal-certified CDFI as well as the Commonwealth's designated Alternative Financing Program (AFP) under the federal Assistive Technology Act.

- PATF's mission is to provide education and financing opportunities, and advocacy, for people with disabilities and older Pennsylvanians, helping them to acquire the assistive technology devices and services that improve the quality of their lives.

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- PATF is governed by an 18-member “consumer-controlled” Board of Directors. This means that the majority of the Board members are individuals with disabilities or immediate family members of individuals with disabilities.

PATF serves Pennsylvanians of:

- All ages
- All income levels
- All disabilities and health conditions

PATF’s Programs:

- **Information and Assistance (I&A) Services:** Staff provides information and assistance about assistive technology, funding resources, and vendors and retailers. PATF recently published a comprehensive resource book entitled *Funding Your Assistive Technology: A Guide to Funding Resources in Pennsylvania*. PATF has also created other informational handouts and infographics, including: The ABLE Program vs. Special Needs Trusts, Decision-Making for Adults, and a Community HealthChoices (a home- and community-based waiver program) toolkit.
- **Asset Development and Financial Empowerment:** PATF provides financial education and coaching to help applicants and transition-age youth plan for their future and/or qualify for a PATF loan. PATF has created a comprehensive financial education curriculum, including an educator’s guide, named *Cents and Sensibility: A Guide to Money Management* (now in its 6th edition) that includes information that is uniquely important for individuals with disabilities. PATF has also created a website for *Cents and Sensibility*, www.studymoney.us, so that the material is readily available to all Pennsylvanians.

PATF establishes Individual Development Accounts (IDAs) for participants in Money Club (PATF’s transition-age youth financial education program) for the purchase of assistive technology. PATF also promotes Pennsylvania’s ABLE program (www.paABLE.gov.) Both programs offer participants a safe method of saving and planning for the future because monies in these accounts do not count as an asset; and therefore, the participant (beneficiary) is not at risk of losing important government benefits.

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- **Financial Loan Programs:** PATF has three cash loan programs so that individuals with disabilities, family members and older Pennsylvanians can purchase the AT they need. Loans can be used to pay co-payments required by health insurance or government programs for assistive technology, assistive technology devices and/or assistive technology services. Loan programs include:
 - Mini-Loan Program, a microloan, for amounts that range from \$100 to \$2,000 at 0% interest and no fees. There is a \$20/month minimum for a maximum repayment term of three years. For borrowers who are very low-income (up to 200% of the federal poverty guidelines – \$24,980 for a family of one), a partial grant of up to 50% of the loan amount (maximum of \$500) may be awarded so that the loan is more affordable. Mini-loans are used to purchase items such as iPads, computers, adapted bicycles, seat-lift chairs, hearing aids, portable ramps, and sensory devices such as flashing lights and bed shakers.
 - All payments in this program are reported to the Credit Builders Alliance, who, in turn, report to the three credit reporting bureaus (TransUnion, Equifax and Experian) so that borrowers have an opportunity to improve their credit.
 - Low-Interest Loan Program for amounts that range from \$2,000 to \$60,000 at 3.75% interest and no fees. The repayment terms are based on the useful life of the device (example: home equity loan, 10 years; new adapted vehicle, 7 years; used vehicle, 6 years; hearing aids, 3 – 4 years). Borrowers typically have excellent or good credit (600 and higher FICO score and a 50% or lower debt-to-income ratio).
 - Low-Interest, Guarantee, Loan Program for amounts that range from \$2,000 to \$35,000 at 3.75% interest and no fees. Like the Low-Interest Loan Program, the repayment terms are based on the useful life of the device. This program is for borrowers who have no credit or poor credit but have the ability and willingness to repay a loan. In these situations, the PATF’s Board of Directors may decide to guarantee the loan amount up to \$35,000.

Currently PATF has a contract with three partner banks (Santander, Bryn Mawr Trust and Malvern Federal) and these banks use their capital to extend the low-interest loans. PATF uses its own funds to guarantee loans, when necessary. PATF buys-down the interest rate on all low-interest loans so that the interest rate is fixed and as low as possible.

Outcomes

Since 2002, PATF has extended 36,048 loans worth \$39,054,945. In the last 9 years, PATF has also helped 8,528 individuals (unduplicated) with Information and Assistance services. In 2018, 98% of PATF's borrowers in the Mini-Loan Program were very low-income; 92% of PATF's borrowers in the Low-Interest, Guaranteed, Loan Program were low-income; and 86% of PATF's Low-Interest Loan Program were low-income.

The default rate on PATF's loans is lower than that of most traditional lending institutions – less than 2%. This low rate is impressive for several reasons: 1) people with disabilities and seniors often encounter health crisis and interrupted employment and it may be difficult to repay a loan; 2) PATF helps people of all ages and most loans are unsecured; 3) not surprisingly, several borrowers die every year; 4) the majority of PATF's borrowers are very low-income (HUD guidelines); and 5) many of the borrowers are “unbanked,” have no credit or have poor credit. And, yet, because of the on-going support that PATF provides (including the possibility of rescue payments), most borrowers repay their loans in a timely fashion.

The Center for Financial Independence and Innovation

The Center for Financial Independence and Innovation (CFII), located in Georgia, is a consumer led 501(c)(3) and certified CDFI. CFII operates its AT loan program – Credit Able – jointly with Tools for Life, the Assistive Technology Act Program for the state. CFII has contracted with the Georgia Tech Research Corporation (Accessibility for All-Tools for Life) to manage Credit-Able's operations. These organizations work together to provide access to low-interest loans for AT as well as credit building services. They support consumers with disabilities to help them identify solutions that will increase their independence, but also identify funding solutions the consumer can use before having to go into debt. This partnership ensures that the consumer has resources to acquire the type of device they need. Alternately, a person may know that they need funding, but need help in choosing a device that works for them. In that case, they would work with an AT specialist to explore options, then work with Credit-Able to find funding, whether through a third-party funder such as a bank or credit union or in the form of a loan from CFII, to get the solution identified.

Both the CFII and Tools for Life are consumer-controlled organizations, and both have a board that must be at least 51% people with disabilities and are often well above that threshold. Having a consumer-controlled board lets consumers know that leadership understands the barriers being faced. This ultimately helps to foster trust and comfort within the disability community.

A majority of Credit-Able consumers are low-income and live in rural parts of Georgia. Outreach and education are conducted in collaboration with the accessible library system, independent living

network, and aging and disability resource connections. Marketing for the program also takes place with these partners as well as the Georgia Radio Reading Service. The Credit-Able program also works with various peer-led organizations to provide support and outreach, such as the National Federation of the Blind of Georgia, Georgia Center of the Deaf and Hard of Hearing, People First and the Developmental Disability Council.

Financial education is a service that Credit-Able provides to Georgians with disabilities; it can be done one-on-one or in group setting either in person or remotely. Further, financial education resources are provided with every presentation that Tools for Life does in the community.

There are two types of loans that Credit-Able provides:

- **Assistive Technology Loans** – The AT loan is the foundation of the Credit-Able program. Credit-Able can provide loans up to \$5,000 for a maximum of eight years, based on the life of the device, and interest rates between 3% and 8% based on the credit score of the applicant. The loan can be used for any type of assistive technology, home modification or vehicle modification. This loan can also be taken out on behalf of a child or family member as long as the person with a disability is directly benefitting from the AT acquired.
- **First \$TEP Credit Builder Program** – The Money That Empowers People Program provides credit builder loans of up to \$1,000 at a maximum term of two years with 4% interest. These funds can be used for smaller dollar AT products or to escape predatory lending. This program has been used by consumers that are unscored as well as those who have a score below 500. Consumers must leave the loan active for six months and have to participate in financial education service trainings before they are eligible.

Case Study

Below are four examples of how CDFIs that are also Alternative Financing Programs (AFPs) use their lending programs to provide AT devices to people with disabilities and their families. As the examples demonstrate, there are a wide variety of AT devices that help people improve the quality of their lives.

Northwest Access Fund

As a Film Studies student in college, Michael Duffy always had a passion for film. But diagnosed with bi-polar and high anxiety disorder, his employment opportunities were limited. Michael received small business training from NWAF and was able to qualify for a microenterprise loan to purchase a high-quality digital video camera. He converted a room in his house to a small studio and is now able to run his film company, Toonsmith Studios, within the safety and comfort of his home.

Self-Help Credit Union

A devastating auto accident in 2016 left Hogan Van Sickle of Charlotte, NC completely paralyzed from a badly damaged spine. She now relies on a wheelchair for mobility and a high-tech bed for around-the-clock comfort. A Self-Help Credit Union Assistive Technology Loan enabled Hogan and her mother to purchase the voice-activated bed, allowing her to live at home rather than in an assisted living facility.

Georgia Credit Able

VJ, a consumer living in rural Central Georgia, had become isolated and depressed because they were unable to leave their home. Traveling outside the home was physically exhausting and they couldn't afford the co-pay for a power chair. This isolation was also leading to problems with getting to doctor's appointments and they were afraid of being institutionalized. VJ applied for a Credit-Able loan to help cover the cost of their co-pay for a power chair. After getting the device VJ was active in the community, becoming a board member of their local Center for Independent Living and volunteering in the community. Their health and well-being were improved by being able to get to doctor's appointments and participate in recreational activities.

Pennsylvania Assistive Technology Foundation

Mrs. Davis and her daughter, Nancy, who has cerebral palsy and is a wheelchair user, came to PATF for a low-interest loan so that Nancy could purchase an adapted vehicle. Nancy works part-time at a branch of The Arc as an advocate and writer. The vehicle adaptations (lowered floor, ramp, tie-downs) Nancy needed were paid for by the Office of Vocational Rehabilitation. Nancy and her mother received a low-interest loan for \$25,000 for the chassis (body of the vehicle)

Loan Details:

Total Loan Amount: \$25,000

Term: 84 months

Interest rate: 3.75%, 0 fees

Monthly payment: \$338.86

Module 7 – Housing

Course Overview

People with disabilities experience unique challenges in the housing market. This population not only requires quality, affordable, and accessible housing, but also additional supports and services that make it possible to live, work and play in the community.

Community Development Financial Institutions (CDFIs) have existed for several decades; however, it is only now that the industry is making a serious attempt to serve the disability market. One might ask, “Why weren’t CDFIs more active before now?”

This Chapter Presents

- A description about the housing market for people with disabilities
- Housing loan products
- Loan underwriting, approval, closing, and servicing/monitoring
- Case studies illustrating various types of projects, lending models and loan products

Housing Market for People with Disabilities

Description

The Technical Assistance Collaborative (TAC) and the Consortium for Citizens with Disabilities Housing Task Force co-authored “The Priced Out” report, which documents the national housing crisis experienced by people with disabilities. In 2016, millions of adults with disabilities living solely on Supplemental Security Income (SSI) found that renting a modest housing unit in their community would require nearly all of their monthly income. In hundreds of higher-cost housing markets, the average rent for such basic units is actually much greater than the entirety of an SSI monthly payment.

Using the most current data available, Priced Out highlights the enormous challenge of meeting rental housing costs with the monthly income of a person living solely on SSI payments. Some of the key findings of this national report include:

- There are 4,845,183 people with disabilities in the United States living on SSI only
- In 2016, the average annual income of a single person receiving SSI payments was \$9,156 — which is about 22% below the 2016 federal poverty level, and equal to only 20% of the national median income for a one-person household

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- The national average rent for a studio/efficiency unit in 2016 was \$752, equal to 99% of monthly SSI payments. In thirteen states and the District of Columbia, areas with the highest housing costs in the nation, the average rent for even a studio/efficiency unit exceeded 100% of the income of an SSI recipient
 - In 220 housing market areas, one-bedroom rents exceeded 100% of monthly SSI payments — an increase of almost 60 markets since the last Priced Out report that was published in 2014

What does this mean for people with disabilities? Too often, the answer is homelessness, institutionalization, incarceration, substandard housing, or severe rent burdens. Research has demonstrated that costs incurred by people with disabilities cycling through public institutions are far greater than the cost of providing rental assistance with supports.

CDFIs have the opportunity to positively impact the disability community by providing flexible lending capital to support housing efforts. Additionally, CDFIs have the ability to work with other lending institutions, as well as private and public debt and capital providers, to be a part of the solution of providing safe, affordable, accessible and decent housing to people with disabilities. However, in order for CDFIs to be effective in providing lending capital for housing projects, the industry should be aware of and understand affordability, accessibility, and discrimination which can be barriers for people with disabilities.

- **Affordability:** As previously discussed, the average monthly SSI payment received by people with disabilities is not sufficient to pay market rate apartment rents.
- **Accessibility:** Many individuals with disabilities require residences that are wheelchair accessible. Locating residences without entrance steps can prove a challenge. Other accommodations, such as wider doorways, raised electrical outlets and lower kitchen surfaces are even more difficult to find and come at additional cost. Retrofitting housing units to accommodate other types of disabilities, such as a blindness or hearing loss, are costly. Unless a developer is intentional about providing these accommodations to the units, they typically do not exist.
- **Discrimination:** The stigma attached to disability remains pervasive despite the fact that about 20 percent of the nation's adult population has a disability of some kind. HUD's Fair Housing Enforcement Office reports that filings by individuals with disabilities comprise the majority of their discrimination complaints. Nonprofits seeking to open group homes

routinely face community push back. Landlords turn down rental applications. Mental illness, especially, gets branded as having high crime potential. The reality is that people with disabilities are frequently the best of neighbors, but misinformation and prejudice can bar them from community participation.

- CDFIs have the opportunity to design responsive products (i.e., low pricing, flexible repayment terms, etc.) to encourage developers to build affordable housing for people with disabilities. However, it is imperative for CDFIs to understand the housing-specific needs and challenges of this population. Therefore, personnel that work for CDFIs must educate themselves on these topics so they can: 1) design the products, 2) have the ability to ask the right questions during the underwriting and due diligence process, and 3) be an advocate for this population.

Housing Loan Products

- Pre-Development Loans
- Land/Property Acquisition Loans
- Construction Loans
- Mini-Perm Loans

Case Studies

Case studies provide real-life examples of how to address a concept or provide a solution to a problem. The case studies below provide various examples of the developer's needs in the various cycles of real estate development. The case studies also demonstrate the solution provided by CDFIs through innovative financing that resulted in a successful completion of the project.

CDFI's Financing Subordinate Loan to Bank Debt – Gaudenzia Claymont Transitional Housing

Gaudenzia was founded in 1968 with the establishment of an initial drug treatment center. Serving about 17,000 individuals annually, Gaudenzia operates 161 drug and alcohol treatment programs at 90 facilities for men and women in Pennsylvania, Maryland and Delaware. Services include specialty programs for pregnant and parenting mothers, adolescents, and people suffering from co-occurring mental illness and substance abuse.

Gaudenzia Claymont Transitional Housing, located in Claymont, DE had a total development cost of \$5 million including acquisition costs of \$1.2 million and total construction costs of \$2.9 million. To support the construction of this project:

- The CDFI and the National Council on Agricultural Life and Labor (NCALL) (lead lender), along with NeighborWorks Capital and Partners for the Common Good, provided second lien financing for the project
- The senior lender is Citizens Bank
- There were various committed Federal Home Loan Bank grants that were further subordinated
- The CDFI's financing charged a 5.5% fixed interest
- The terms were monthly payments; interest only during construction, 25-year amortization beginning in year two; with a balloon principal payment due at maturity

The loan to Gaudenzia was to finance the renovation of a 20,000 square foot building. This included 16 units of recovery transitional housing for low-income individuals and 10 units of transitional housing for women and their children, all recovering from addiction and substance abuse issues. All tenants are expected to be no greater than 50% Area Median Income (AMI), with many likely to be at-risk of homelessness.

Pre-Development Lending – Cabrillo Economic Development Fund (CEDC)

Cabrillo Economic Development Fund (CEDC) has progressed over many years from its infancy as a grower-oriented labor camp to a countrywide housing and economic development corporation serving diverse socio-economic populations. CEDC was incorporated in 1981 as a not-for-profit community economic development corporation with the mission to provide comprehensive housing services to individuals and low-and-moderate income families in Ventura and Santa Barbara counties and adjacent areas in Los Angeles County. They have built over 1,200 units of affordable rental and for-sale housing and have helped over 300 families into homeownership through more than \$35 million in home mortgages.

Disability Opportunity Fund (DOF) provided two pre-development loans to support two projects developed by CEDC. These loans financed project designs, engineering, filing fees, and other pre-construction soft costs associated with the development of two separate housing projects to serve very low-income people with psychiatric disorders and developmental disabilities.

The first project, known as Paseo de Luz, is a 25-unit development targeted to serve very low-income individuals with psychiatric disorders. Eleven units were reserved for individuals at or below 20% of AMI, and another 11 units were reserved for individuals at or below 30% of the AMI. The remaining units were reserved for individuals at or below 50% of the AMI. All lower-level units are fully ADA accessible and all upper floor units are ADA adaptable.

The second project, known as Camino Esperanza, is a 30-unit development to provide homes for adults with developmental disabilities. The development consists of one-story, ranch style, one-

bedroom apartments, and one two-bedroom house-manager's home, and a community center. Camino Esperanza is a LEED (Leadership in Energy and Environmental Design) certified development.

Rehabilitation of a Single-Family Home – The Clarkin Family

The Clarkin family is a Mineola, Long Island family of twelve siblings, seven of whom are classified as developmentally disabled and who range in age from 47 to 63 years old and all are less than 50% AMI. The siblings have been Mineola residents for over 51 years. The siblings with developmental disabilities relocated out of their family home due to deferred maintenance and failing building systems that made the dwelling uninhabitable. The care-giving siblings relocated their brothers and sisters with the hope that together they could secure financing to rehabilitate the home.

DOF provided a \$50,000 loan to the Clarkin family to finance hard and soft costs incurred as part of making substantial improvements to land located in Mineola, New York. DOF signed a joint-venture agreement whereby Habitat for Humanity, DOF and the Clarkin family to gut rehabilitate the property for the long-term use and occupancy of the Clarkin siblings with disabilities and, upon their relocation or demise, for others with physical and/or mental disabilities.

The new home is energy-star rated and uses "aging in place" design concepts that will increase the likelihood that the Clarkin's can remain independent. The designs include wider doorways and staircases to accommodate wheelchairs and wheelchair lifts alongside state-of-the-art technology to allow for the future installation of cameras and an intercom system, if necessary.

Construction Lending – Luna Azul Development Fund, LLC

Located on approximately 4.5 acres within the Phoenix metropolitan area, Luna Azul is conveniently located near public transportation, employment, social, recreational, and cultural opportunities and activities. With a secured gated entrance, perimeter fence, 24-hour on-site staffing and a traffic-free campus, Luna Azul provides residents a safe living environment, and gives peace of mind to families.

Luna Azul, which is currently under construction, will be comprised of 30, two- and three-bedroom, cottage-style residences within an intimate neighborhood setting designed for adults with intellectual, developmental and acquired disabilities. Pocket neighborhoods provide the setting for residents to develop meaningful relationships beyond family and housemates. The community's smaller scale and front porch positioning encourages residents to engage in conversations with neighbors.

The community offers a range of amenities to serve adults with disabilities with indoor and outdoor community gathering spaces as well as a Center House. Through the Homeowners Association, the neighborhood organizes and funds social and recreational activities; provides 24-hour staffing; maintains the common areas; and provides other services to meet the common needs of residents.

DOF provided a \$6,725,000 loan facility to Luna Azul Development Fund, LLC to finance the horizontal and vertical development of a "pocket neighborhood" of 30 houses that are suitable for, but not exclusive to, adults with intellectual, developmental and acquired disabilities.

The loan consists of a \$4,150,000 horizontal and a \$2,575,000 vertical component. The loan will be a term loan at 8.50% interest with a two-year period, interest-only. The principal will be repaid with 100% of the sale proceeds of each unit after customary sales costs that shall in no event exceed 10% of the sale price. DOF will require the borrower to escrow 3% of each disbursement into an interest reserve that will in no event be less than 3% of the then outstanding loan balance.

Dominant themes among adults with disabilities are their desires for permanency, independence and self-determination. Homeownership offers families and their children the greatest and most reliable degree of choice and freedom, including the ability to choose where, how and with whom they live, while managing the services they need.

Underwriting Training

The ability to assess the risk of a potential borrower is crucial to the overall health of CDFIs. It is important that while providing lending support to community development focused clients and achieving their missions, that CDFIs remain prudent in assessing the creditworthiness of borrowers. Additionally, legal documentation, loan servicing and monitoring are just as important to the overall health of the organization. Therefore, it is imperative that appropriate staff are well-trained about the aforementioned issues.

The following are various organizations that provide training to CDFIs in these areas:

- **NeighborWorks America**, a nationally recognized organization, provides training and a multitude of certification offerings. In-person training events and online courses are available on various affordable housing and other training topics with most of the courses counting toward professional certificates and certifications.
- **National Development Council (NDC)** has a nationally recognized training program to help build a professional workforce in economic and community development that can advance and sustain progress in their communities. NDC courses teach professionals how to evaluate small businesses for creditworthiness, structure real estate deals, finance affordable housing, assemble financing for complex projects using tax credits, tax-exempt bonds, other state and federal programs, and more.
- **Novagradic** and **Cohn Reznick**, both national professional services organizations, have conferences throughout the year where they educate and keep professionals up to date in related topics such as tax credits (historic, low income and new markets) as well as Opportunity Zones. These tools can be used to finance affordable housing facilities for people with disabilities.

- **Council of Development Finance Agency (CDFA)** offers a variety of educational opportunities, including training courses, seminars, workshops, webcasts, and publications. Through the CDFA Training Institute's course offerings and professional development opportunities, participants from both the public and private sectors can learn how to utilize the development finance toolbox. The CDFA Training Institute offers an education dedicated to the economic development finance industry. Courses are offered in both in-person and online settings using a variety of teaching methods. Development finance professionals are encouraged to further their industry knowledge by completing CDFA's Development Finance Certified Professional (DFCP) Program.

Other organizations that have training programs include the following: The **American Bankers Association (ABA)**, **CCIM Institute**, and **Risk Management Association (RMA)**. These offer various commercial real estate training courses that include underwriting and risk management topics.

HUD Funding Announcement

On October 9, 2019, the U.S. Department of Housing and Urban Development (HUD) announced that there is a combined \$112 million available to expand the supply of permanent affordable housing for very low-income persons with disabilities. Funding is available for the two components of the Section 811 Program - traditional Section 811 Supportive Housing for Persons with Disabilities and Section 811 Project Rental Assistance. The available funding includes \$75 million in capital advances for the development of new supportive housing for this vulnerable population. This is the first time HUD is offering funding for both programs in nine years.

In addition to support for construction, Capital Advance awards provide operating subsidies in the form of a Project Rental Assistance Contract ("PRAC") to maintain ongoing affordability over the next forty years. These much-needed units provide persons with disabilities the opportunity to live as independently as possible within the community in an integrated environment that provides access to appropriate and voluntary supportive services.

HUD seeks to fund innovative Section 811 permanent supportive housing models that will be at the forefront of design, service delivery and efficient use of federal resources. To meet this goal, HUD expects successful applications to demonstrate best practices or innovation in both physical design and supportive services. Proposals must promote the long-term housing security and facilitate community integration of persons with disabilities. HUD aims to provide Capital Advance funding to those applicants who use Capital Advance funds to leverage other financing sources to meet the goal of the development of permanent supportive housing and increasing the number of units produced per dollar of Federal resources.

Source and to learn more:

https://www.hud.gov/program_offices/spm/gmomgmt/grantsinfo/fundingopps/fy2019_section811_capadvance

<https://www.grants.gov/web/grants/view-opportunity.html?oppld=321435>

This funding allows nonprofits to leverage CDFI loan products. This HUD funding provides additional grant capital to construct projects benefiting people with disabilities as well as to provide long-term capital, thereby strengthening the construction financing and the long-term viability and cash flow.

Module 8 – Business Lending

Many people with disabilities often do not have the assets or income to apply for loans including small business loans. Therefore, CDFIs must be creative and provide flexible financing for small business owners with disabilities. CDFIs can serve entrepreneurs and their respective employees with disabilities in a variety of ways such as developing referral relationships with benefits counselors to ensure entrepreneurs retain their disability benefits. This material focuses on how to help meet the needs of small business owners with disabilities through financing assistance (FA) and technical assistance (TA) services.

This Chapter Presents

This section of the training provides a more in-depth look at Small Business Lending, Microloans (FA) and Business Development (FA) and how they impact the lives of entrepreneurs and their respective employees with disabilities.

Course Overview

This manual provides a more in-depth look at Small Business Lending, Microloans (FA) and Business Development (FA) and how they impact the lives of entrepreneurs and their respective employees with disabilities.

Business Lending Backstory

Small Business Market for Entrepreneurs and People with Disabilities

According to 2018 Bureau of Labor Statistics, among employed individuals, people with disabilities (PWDs) were self-employed at a rate almost 70% higher than people without disabilities. Yet, PWDs are also more likely to be unemployed as businesses often worry about costs associated with employing PWDs. Hence, entrepreneurs with disabilities are much more likely to run their own businesses and often need creative and patient financing partners to address their unique needs and challenges.

Challenges and Opportunities

Challenges: PWDs often have difficulty securing and maintaining traditional job placements. Self-employment and entrepreneurship opportunities represent alternative employment and economic self-sufficiency strategies. Self-employment may provide PWDs greater job customization, higher wages, increased autonomy, a stronger sense of dignity and greater opportunity to follow career aspirations.

Disability mobility-issues and attitudinal barriers can make operating a business less profitable for PWDs. For instance, lenders or potential business partners may perceive extra risk when evaluating a loan or partnership with a PWD and shy away from engagement.

In 1998, PWDs were almost twice as likely to be self-employed according to the 1998 Presidential Task Force on Employment of Adults with Disabilities. Twenty-one years later, among employed people PWDs are self-employed at a rate almost 70% higher than individuals without disabilities according to 2018 Bureau of Labor Statistics data. Yet, there is sparse entrepreneurial support that recognize the unique challenges facing entrepreneurs with disabilities.

For example, self-employment training is usually not a component of workforce development or vocational rehabilitation services, preventing PWDs from gaining critical business skills. According to a [2016 report from the National Task Force on Workforce Development for People with Disabilities](#), less than 3 % of all vocational rehabilitation case closures nationwide are the result of a self-employment placement.

PWDs also face financial barriers to business ownership due to policies and practices that discourage building assets and attracting capital (i.e. disability benefits often set income and asset limits). Furthermore, societal attitudes about disability can create challenges to acquiring loans and attracting investors.

Opportunities: Many CDFIs have loan and development programs supporting entrepreneurs of socially disadvantaged groups like women, racial/ethnic minorities and veterans. CDFIs can also support existing entrepreneurs with disabilities, PWDs interested in self-employment, and businesses that employ PWD by adapting existing programs to be disability inclusive.

Successful strategies for engaging PWDs include developing awareness, education and outreach campaigns and developing referral relationships with benefits counselors, which also helps ensure benefits retention and navigation services continue to be available in tandem with entrepreneurship and self-employment efforts.

The U.S. Department of Labor’s Office of Disability Employment Policy is a good resource for CDFIs seeking to support PWD self-employment. In 2006, the Department funded an initiative called START-UP which identified policies and practices that either made it difficult for PWDs to become self-employed or supported them in becoming self-employed. As part of the initiative, three states (Alaska, Florida, and New York) were awarded grants to pilot innovative models to help PWDs start businesses. A fourth grant established the national technical assistance center, Self-Employment Technical Assistance, Resources, and Training (START-UP/USA), to provide information and guidance about promoting self-employment for PWDs to the state grantees and to serve as a national resource for individuals and agencies seeking to increase self-employment for PWDs.

The START-UP initiative final report, [Self-Employment for People with Disabilities](#), details the self-employment models tested, the barriers and achievements of the grant programs, and case studies of several PWDs who successfully became self-employed. <https://www.dol.gov/odep/pdf/2014StartUp.pdf>

Key Findings from the report include:

- There has been little engagement by public programs to help people with disabilities explore self-employment as a viable work option.

-
- Almost half (47.4%) of the enrollees in the program with a reported diagnosis (190 individuals) had physical impairments, 28.1% had cognitive or mental disorders, and the remainder had medical, visual impairments, hearing impairments, or disabilities that were not disclosed.
 - The START-UP initiative documented the potential benefits of cross-system collaboration and the increased support of individuals with disabilities interested in self-employment. Of 194 individuals enrolled in START-UP programming:
 - 137 achieved at least one major milestone such as initiation of a business plan;
 - 56 reported an operating business; and
 - 37 businesses filed federal tax returns.
 - The reported benefits to participants were:
 - Increased income
 - Increased self-worth and satisfaction
 - The ability to customize their employment to their disabilities
 - The freedom to use their talents and interests.
 - The project provided policy samples, self-employment strategies, capacity building and other information to over 16 other states and helped two additional states in developing self-employment programs for people with disabilities.

In addition to the insights gained through the START-UP report, CDFIs can leverage the following resources:

- Ignitespot's Small Business Resources for Entrepreneurs with Disabilities
(<https://www.ignitespot.com/small-business-resources-for-entrepreneurs-with-disabilities>)
Entrepreneur Resources for People with Disabilities
(<https://www.disability.gov/resource/disability-govs-guide-self-employment-starting-smallbusiness/>) Details important considerations for potential entrepreneurs with disabilities.
- Important Considerations for Entrepreneurs with Disabilities
(<https://www.dol.gov/odep/topics/SelfEmploymentEntrepreneurship.htm>) Outlines important considerations for potential entrepreneurs with disabilities.

Small Business and Self-Employment Service

(<https://www.dol.gov/odep/topics/SelfEmploymentEntrepreneurship.htm>) Provides access to information such as the pros and cons of starting a business as a disabled person, counseling, and referrals regarding self-employment and small business ownership opportunities for people with disabilities.

- Work Support
(<http://www.worksupport.com/>) Contains self-employment information and resources for individuals with disabilities.
- Ticket to Work Program
(<https://www.ssa.gov/work/>) Connects Social Security Disability Insurance and Supplemental Security Income beneficiaries with employment networks for training and other support services needed to achieve employment goals, including self-employment.
- Massachusetts Home-Based and Self-Employment Guide
(<http://www.mass.gov/eohhs/consumer/disability-services/advocacy/consumer-involve/homebased-and-self-employment-guide.html>). A guide created by the Massachusetts Rehabilitation Commission Vocational Rehabilitation Services for MRC Consumers.
- Accessible IRS Tax Products
(<https://www.irs.gov/uac/accessible-irs-tax-products>) Provides popular tax forms from the Internal Revenue Service (IRS) and publications in accessible formats, including Braille and talking formats.
- Facts About Disability-Related Tax Provisions
(<https://www.eeoc.gov/facts/fs-disab.html>) Contains facts on the IRS' disability-related provisions that are of particular interest to businesses as well as people with disabilities.
- Tax Incentives Packet on the Americans with Disabilities Act
(<https://www.ada.gov/archive/taxpack.htm>) Explains how to take advantage of the tax credit and deduction available for complying with the ADA.
- Business Leadership Network

(<http://www.usbln.org/>) Details the only national disability organization led by business for business, and how it promotes best practices in hiring, retaining and marketing to people with disabilities.

- Chamber of Commerce for Individuals with Disabilities

(<http://disabilitychamber.org/>) Provides information about the national consumer volunteer organization that uses business principles to improve the economic status of individuals with disabilities.

- Disabled Businesspersons Association

(<http://disabledbusiness.org/>) Explores the association that assists enterprising individuals with disabilities to succeed in the business world.

- Job Accommodation Network (JAN)

(<http://askjan.org/entre/index.htm>) Provides access to technical assistance, consulting and mentoring services for disabled entrepreneurs.

- Disability Entrepreneurs: What Can You Do Campaign

(<https://www.whatcanyoudocampaign.org/blog/index.php/what-can-you-do/>) Explores information and resources for disabled entrepreneurs.

- SBA Administrator Maria Contreras-Sweet: SBA Video Phone Service Rollout for Deaf and Hard of Hearing Entrepreneurs

(<https://www.sba.gov/content/sba-video-phone-service-rollout-deaf-and-hard-hearingentrepreneurs>)

- SBA American Sign Language (ASL) Services

(<https://www.sba.gov/about-sba/what-we-do/american-sign-language-asl-services>) SBA has launched the American Sign Language (ASL) Video Customer Support Line which allows deaf and hard of hearing customers to communicate directly with the SBA over videophone. Now deaf and hard of hearing customers have a better option to communicate with the SBA to get service or support for their businesses.

- SBA - People with Disabilities

(<https://www.sba.gov/starting-business/how-start-business/business-types/people-disabilities>) Resources to help disabled people start, grow and manage a small business.

- CAPTEC - Computer/Electronic Accommodations Program
- (<http://www.cap.mil/Customers/CAPTEC.aspx>) CAP's Technology & Evaluation Center (CAPTEC) is a demonstration and assessment facility located in the Pentagon. People seeking solutions to accessibility challenges can visit CAPTEC to see assistive technology (AT) and compare different solutions.

Small Business Development

The following organizations can be leveraged in providing small business development:

Small Business Development Centers (SBDCs)

The U.S Small Business Administration (SBA) administers the Small Business Development Center Program to provide management assistance to current and prospective small business owners. SBDCs offer one-stop assistance to individuals and small businesses by providing a wide variety of information and guidance. <https://americassbdc.org/>.

Veterans Business Outreach Centers (VBOCs)

Veterans Business Outreach Center (VBOC) Program is designed to provide entrepreneurial development services such as business training, counseling and resource partner referrals to transitioning service members, veterans, National Guard & Reserve members and military spouses interested in starting or growing a small business.

<https://www.sba.gov/offices/headquarters/ovbd/resources/1548576>.

Women's Business Centers (WBCs)

The SBA Women's Business Centers are a national network of more than 100 centers that offer one-on-one counseling, training, networking, workshops, technical assistance and mentoring to women entrepreneurs on numerous business development topics, including business startup, financial management, marketing and procurement. These centers seek to level the playing field for all women entrepreneurs, who still face unique obstacles in the business world.

<https://www.awbc.org/>.

Minority Business Development Agency (MBDA)

Minority-owned firms seeking to penetrate new markets and grow in size and scale, can access business experts at a MBDA Business Center. Whether it's securing capital, competing for a contract, identifying a strategic partner or becoming export-ready, the Business Center can help. The MBDA Centers are located in areas with the largest concentration of minority populations and the largest number of minority businesses. MBDA Centers do not provide loans or grants to start or expand businesses. The grants MBDA does provide are to organizations that operate MBDA's Minority

Business Centers throughout the United States. These organizations provide business consulting, procurement matching and financial assistance to minority-owned firms. <https://www.mbda.gov/>.

SBA Service-Disabled Veteran-Owned Small Business Program

The federal government's goal is to award at least three percent of all federal contracting dollars to service-disabled veteran-owned small businesses each year. The government limits competition for certain contracts to businesses that participate in the Service-Disabled Veteran-Owned Small Business program.

Joining the service-disabled veteran-owned business program makes participants eligible to compete for the set-aside contracts and still compete for contract awards under other socio-economic programs they qualify for. <https://www.sba.gov/federal-contracting/contracting-assistance-programs/service-disabled-veteran-owned-small-businesses-program>

Disability Inclusion Strategic Alliance Opportunity

To propel business disability inclusion domestically and internationally, the U.S. Business Leadership Network (USBANK), was rebranded as Disability:IN.

Disability:IN is the leading nonprofit resource for business disability inclusion worldwide with a network of over 185 corporations. Disability:IN expands opportunities for people with disabilities across enterprises, and their central office and 30 Affiliates serve as the collective voice to affect change for people with disabilities in business.

Disability:IN seeks to partner with organizations that promote intersectional inclusion. Their strategic alliances are comprised of disability organizations as well as organizations that advocate for women, minorities, the LGBTQ community, and veterans.

What Disability:IN Can Do: Disability:IN certifies disability-owned business enterprises and links them to entities looking to diversify their supply chains. Their Supplier Diversity program is the leading third-party certifier of disability-owned business enterprises (DOBE[®]s), including veteran-owned business enterprises (V-DOBE[™]s) and service-disabled veteran-owned business enterprises (SDV-DOBE[™]s).

The program provides information, tools and other developmental resources helping certified suppliers expand contract opportunities with key corporate partners, government agencies and other disability-owned businesses.

What Disability:IN Cannot Do: They do not certify non-profit organizations or private businesses who employ person(s) with disabilities.

How can CDFIs partner with Disability:IN? CDFIs could partner with organizations such as Disability:IN by providing access to capital for certified Disability Owned Businesses. CDFIs may also be able to leverage these partnerships to build relationships with corporations and foundations that could become funding partners.

Contact Information: <https://disabilityin.org/who-we-are/about/>

Small Business Loan Products

The lending needs of entrepreneurs vary widely. For entrepreneurs with disabilities, the story is no different. A business owner with a proven track record may easily find financing at the bank or credit union which services their deposit accounts. For entrepreneurs with disabilities who may be trying to keep a new business going or who may be trying to get a business started, the lending options are far fewer. Before taking out a loan, an entrepreneur should determine eligibility for grants or other subsidies and, if available, take advantage of these options first. Some tools for CDFIs to use in assisting this specialized population of entrepreneurs with loan products include the following:

SBA Microloan Program

SBA Microloans are typically offered to businesses with smaller start-up capital needs (usually less than \$50,000). Unlike traditional bank business loans, funding is typically provided via community-based, nonprofit microfinance institutions. Furthermore, SBA's popular Microloan Program provides short-term loans up to \$50,000 to help small businesses startup and expand, although the average microloan is about \$13,000.

Anyone can apply for a microloan, although these loans often favor people with low cash reserves or poor credit as well as those in rural or disadvantaged communities. However, many micro-financing institutions also offer specific micro-financing programs for women-owned businesses, environmentally-responsible businesses, veterans and specific business-types. Microloans must be repaid in six years and can be used for:

- Working capital
- Buying inventory or supplies
- Purchasing furniture or fixture
- Investing in machinery or equipment

CDFIs Microloan Business Underwriting

The ability to assess the risk of a potential borrower is crucial to the overall health of CDFIs. It is important that while providing lending support to community development focused clients and achieving their missions, that CDFIs remain prudent in assessing the creditworthiness of borrowers. Additionally, legal documentation, loan servicing and monitoring are just as important to the overall health of the organization. Therefore, it is imperative that staff are well-trained about the aforementioned issues.

Where Can CDFIs Serving PWDs Find SBA Microloan Intermediaries?

The SBA provides funds to specially designated intermediary lenders, which are nonprofit community-based organizations with experience in lending as well as management and technical assistance. These intermediaries administer the Microloan program for eligible borrowers. CDFIs can learn more about becoming an SBA Microloan Lender by going to:

<https://www.sba.gov/partners/lenders/become-sba-lender>

Where Can Entrepreneurs with Disabilities Get a Microloan?

CDFI Microlenders with loan programs targeting PWDs:

- Accion Chicago (<https://us.accion.org/loan/business-loans-for-people-with-disabilities/>)
- PeopleFund-Texas (<https://peoplefund.org/about-us-small-business-loans/>)
- Carolina Small Business Loan Fund (<https://carolinasmallbusiness.org/loans/loan-products/>)

CDFI Loan Referral Partnership Opportunities

CDFI loan referral partnership opportunities:

- Dog Tag Inc. <https://www.dogtaginc.org/>
- Bunker Labs <https://bunkerlabs.org/our-programs/veterans-in-residence/>
- Office of Veterans Business Development: Boots-to-Business
<https://www.sba.gov/offices/headquarters/ovbd>
- 100 Microloans to Disabled Veteran Entrepreneurs
<https://www.clintonfoundation.org/clinton-global-initiative/commitments/100-microloans-disabled-veteran-entrepreneurs>

Using Personal Loans for Small Business Purposes

Borrowers can also use personal loan proceeds to fund their business needs. Family members of the borrower may be able to co-sign or provide pledged security for a loan for borrowers with disabilities. A lender may also be willing to look at alternative credit sources for borrowers who may not have traditional credit histories. The borrowers may also have alternative sources of income that would allow them to qualify for a business-purpose personal loan using the CDFI's current guidelines.

Generally speaking, personal loan lending guidelines will not allow for the projected income to be used for a business, so this often makes it difficult for a CDFI to lend in situations where the borrower does not have another source of income or a strong co-borrower. In cases like this, a true business loan product is needed. But in cases where relatively small sums of money are needed for a business, a personal loan is often worth exploring.

Business Loan Product – SBA Community Advantage Program

Community Advantage is a pilot initiative aimed at increasing SBA 7(a) lenders who reach underserved communities, targeting mission-focused financial institutions previously not able to offer SBA loans.

- Maximum Loan Size: \$250,000
- Guarantee: 85 percent for loans up to \$150,000 and 75 percent for those greater than \$150,000.
- Approval Times: Most Community Advantage loans will be approved within 5-10 days.
- Paperwork: Community Advantage features streamlined paperwork, with a two-page application.
- Eligibility: Community Advantage is open to mission-focused lenders, including some CDFIs, non-profit Certified Development Companies and SBA-approved micro-lending intermediaries.
- Requirements: Community Advantage lenders are expected to maintain at least 60 percent of their SBA loan portfolio in underserved markets.
- More information can be obtained at:
<https://www.cdfifund.gov/Documents/CommunityAdvantageandSmallLoanAdvantageFactSheet.pdf>

Assistive Technology Loans

Entrepreneurs with disabilities as well as business owners who employ PWD may need to purchase assistive technology to support job performance. For more information about assistive technology loans, please refer to the “Assistive Technology” chapter in this training manual.

Case Studies

Chocolate Dreams

Growing up in southern Mexico and northern Guatemala, Julia Balassa-Myracle developed an affinity for chocolate. She has been cooking all her life and the culture influenced her style; she really enjoyed making molé and cooking with spices. As the years passed, Julia began exploring the world of chocolate and the minute she got into confections, she found a hobby that would take her in a whole new direction.

Julia previously worked as an officer in a maximum security juvenile facility. The work environment was stressful and exhausting. When she'd come home from work, she would immerse herself in making chocolates. She enjoyed making gifts for friends but never dreamed of having her own business. Then, Julia became very ill and had to leave her work with the county. With her love of chocolate, she found herself exploring the prospects of opening up her own business and researching what it would really take. And soon, with a degree from a Canadian chocolate academy, certification as a Master Chocolatier and a business plan in hand – Chocolate Myacles was born.

To make a go of it, Chocolate Myacles needed a state-of-the-art manufacturing facility where Julia could create handcrafted gourmet chocolates and truffles. Julia admitted that “finance was not my forte” and when Julia first built out her home based kitchen, she went to a mainstream bank. The Bank gave her a loan but at a very high interest rate. Because of the high monthly payments on the loan, Chocolate Myacles was struggling when she found the Northwest Access Fund, a CDFI serving people with disabilities in Washington and Oregon.

Northwest Access Fund was able to refinance the business equipment loan at a 5% interest rate. With the new loan, Julia was able to free up her cash flow to re-invest in Chocolate Myacles. Now, she works for herself, makes her own hours and gets to create delicious treats!

- Loan amount: \$25,000
- Interest Rate: 5%
- Monthly payments: \$ 472
- Repayment terms: 60 Months (5 years)

Artonyon Ingram: A Transition to Private Practice

With 21 years in the counseling profession, Artonyon Ingram had combined his educational, professional and life experiences to help families and individuals get through difficult circumstances. When diagnosed with his disability in 1999, a nerve disorder, Tony, who served two years in the US Air Force, six years in the Army National Guard and emphasized being physically fit, found himself going through some major life changes. Among the transitions that came with his new physical disability, Tony had to reduce the amount of hours he worked, going from full-time to part-time. In hopes of opening his own private practice, which would provide Tony the ability to make his own hours and work from his own location, he needed some basic office items, like a desk and printer. After being turned down by traditional lending institutions, he thumbed through the internet looking for an agency that worked with people with disabilities...and that's how Tony found the Northwest Access Fund.

"What I like about the Access Fund is that they didn't just look at my disability or my income status... they looked at the whole picture and they found a workable solution for repayment. I've taken out two loans and they are both almost paid off. Through the loans, I was able to get the items needed to process paperwork and do graduate coursework".

Tony is making a difference in the lives of people in his community. He first worked with at-risk youth, then adults in transition and currently works with a variety of people but now focuses on families in hardship.

- Loan Amount: 5 loans from \$165 to \$706
- Interest Rate: 5%
- Repayment Terms: 6 Months to 24 Months

Toonsmith Studios

In one form or another, film has been a lifelong passion for Michael Duffy. Through the Access Fund's Business Equipment Loan Program, Michael has been able to see his business, Toonsmith Studios, grow to include many possibilities that he had not foreseen.

Diagnosed with bi-polar and high anxiety disorder, Michael's employment opportunities have been limited. But when it comes to video-editing and producing, Michael is one creatively-inclined individual. His talent, however, really comes to fruition and he is most productive when working from the safety and comfort of his home.

While a Film Studies student at Centralia Community College, Michael participated in the Access Fund's small business training webinar and developed a business plan with the goal of eventually becoming self-employed. Michael then submitted a business equipment loan application to purchase what he calls the "heart" of his small business – a professional Panasonic digital video camera.

The loan was approved, and Michael is now more focused than ever on his passion for film. He converted a room in his house to a small studio to be able to run his film company. He uses his camera on a daily basis for shooting footage, uploading, editing and studying the day's work.

As Michael explains in his own words:

"It's hard work producing entertainment and can be profitable in the long run. But resources are next to non-existent to a disabled person with poor credit. My life has changed considerably since pursuing this new path with the help of the Access Fund!"

Module 9 – Market and Strategy

Course Overview

The disability community is large, diverse and identifies itself in multi-dimensional ways through a variety of networks, affinity groups, and values. That diversity equates to a variety of needs. CDFIs can meet those needs by better understanding the market and developing diverse strategies to address evolving needs for persons with disabilities.

This Chapter Presents

- Data gathering methods and resources that may be useful for analyzing the local market
- A series of small group discussions around developing a preliminary strategy for the CDFI to develop products and services to serve the disability market

The Disability Community

This section provides resources for CDFIs to identify the various stakeholders in the disability community, organizations serving people with disabilities, and both qualitative and quantitative ways to collect data/information about people with disabilities in their target markets. This information can help the CDFI better understand the target market for products and services that will serve people with disabilities in their target communities.

Stakeholders

There are many disability stakeholders, formal and informal, passionate about disability rights and disability access for a variety of disability constituencies that include but are not limited to people with significant physical disabilities, intellectual disabilities, social and behavioral disabilities, sensory disabilities and neurodiversity, in general. Accessing public commodities (such as education, transportation, housing, and employment) is a challenge faced by people with disabilities every day. A variety of services are available to people with disabilities, and the services are led by various stakeholder organizations, including self-advocacy networks, service provider organizations, advocacy organizations, government entities, and caregivers. Every state has disability networks that speak to the individual constituencies representative of local people with disabilities and the supports and services they want and need. Capacity differs by state, but in each state, supports and services do exist. Please refer to the Resource Mapping Network Matrix below to better understand the disability stakeholders involved in your state and/or local community. Please note that many of the organizations may represent the “status” of the network identified in this resource list (such as an Independent Living Center) but have their own names as non-profit organizations. For example, an Independent Living Center may have a business/non-profit doing business as (DBA) “Life on Your Terms.

National Resource Chart: National Disability Networks

Network Name	Intellectual Disabilities	Developmental Disabilities	Mental Health	Brain Injury	Physical Disabilities	People with Autism/ASD	Blind or Visually Impaired	Deaf or Hard of Hearing	People with Chronic Illness	Older Adults/Alzheimer's
Aging and Disability Resource Centers (ADRC) https://acl.gov/programs/aging-and-disability-networks/aging-and-disability-resource-centers	X	X	X	X	X	X	X	X	X	X
ADA National Network https://adata.org/	X	X	X	X	X	X	X	X	X	X
American Association of People with Disabilities (AAPD) https://www.aapd.com/	X	X	X	X	X	X	X	X	X	X
American Association of Retired Persons (AARP) https://www.aarp.org/									X	X
Alzheimer's Association https://www.alz.org/										X
Assistive Technology Programs https://acl.gov/programs/assistive-technology/assistive-technology	X	X	X	X	X	X	X	X	X	X
Autistic Self-Advocacy Network https://autisticadvocacy.org/						X				
Centers for Independent Living (CILs) https://acl.gov/programs/aging-and-disability-networks/centers-independent-living					X		X	X	X	
Councils on Developmental Disabilities (CDDs) https://nacdd.org/	X	X		X		X				
Council of State VR Agencies https://www.csavr.org/stateagencydirectory	X	X	X	X	X	X	X	X	X	X

Network Name	Intellectual Disabilities	Developmental Disabilities	Mental Health	Brain Injury	Physical Disabilities	People with Autism/ASD	Blind or Visually Impaired	Deaf or Hard of Hearing	People with Chronic Illness	Older Adults/Alzheimer's
National Association of the Deaf https://www.nad.org/								X		
National Brain Injury Association https://www.biausa.org/				X						
National Down Syndrome Society https://www.ndss.org/	X									
National Federation of the Blind https://nfb.org/							X			
National Association of Mental Illness https://www.nami.org/			X							
National Disability Institute https://www.nationaldisabilityinstitute.org/	X	X	X	X	X	X	X	X		
Protection and Advocacy Centers https://acl.gov/programs/aging-and-disability-networks/state-protection-advocacy-systems	X	X	X	X	X	X	X	X	X	
Statewide Independent Living Councils https://www.ilru.org/projects/silc-net/silc-directory	X	X	X	X	X	X	X	X	X	X
Special Needs Alliance https://www.specialneedsalliance.org/	X	X	X	X	X	X	X	X		
University Centers of Excellence https://acl.gov/programs/aging-and-disability-networks/national-network-university	X	X		X		X				
United Cerebral Palsy https://ucpa.org/					X					
Veteran Organizations https://dvnf.org/										

Network Name	Intellectual Disabilities	Developmental Disabilities	Mental Health	Brain Injury	Physical Disabilities	People with Autism/ASD	Blind or Visually Impaired	Deaf or Hard of Hearing	People w/ Chronic Illness	Older Adults/Alzheimer's
World Institute on Disability https://wid.org/	X	X	X	X	X	X	X	X	X	

Table 2: National Networks and the Types of Disability Supports Offered

Community-Based Participatory Action Research

Community-Based Participatory Action Research (CBPR) engages community stakeholders in a collaborative process of problem identification and assessment of needs, such as through primary data collection and assessment of aggregate secondary information; and, problem resolution by engaging those who directly face the problem/challenge in the process of the co-design of the solution (<https://hc-v6-static.s3.amazonaws.com/media/resources/tmp/cbpar.pdf>). CBPR involves capturing data, such as qualitative measures, including stories shared through an interview or a focus group, as well as quantitative measures, about the number or percentage of how many people in the community are seeking affordable, accessible housing.

CBPR is recommended for CDFIs to adopt as a part of a market analysis approach. Activities may involve engaging disability stakeholders in the market analysis of lending, partnership, and product promotion such that more people with disabilities benefit from the CDFI activity in your area, or other participatory activities that add value to the design and marketing of your CDFI products. CBPR is known for contextualizing the information to a local place or population such that the solution is responsive and not one dimensional. It is also used as a mechanism to incite trust where traditional research methods may be unworthy or unreliable in capturing accurate insight from the population in need. For example, people with disabilities often lack transportation needed to participate fully in society. They have very different preferences on how to best commute which may impact the degree to which certain modes of transportation get utilized. Failure to “get it right” impacts the return on CDFI capital. By involving people with disabilities that struggle with transportation needs in the process of data collection, and interviewing procedures, a CBPR market analysis approach will take these nuances into account as they vary by disability sub-population, socio-economic status, location, and other factors, such as reliability and credibility because people with disabilities are part of the market analysis team and are, in essence, co-designers to the solution, along with the CDFI. In this respect, it may become easier for people in the market segment to share authentic information in the data collection process because respondents know that the person interviewing them struggles with similar challenges and genuinely wants to make a difference.

Data Sources

A variety of interactive data analytics exist for the purpose of improving community living for people with disabilities as well as to benefit community development and economic development investments. CDFIs have access to national data sets and local data sets, each data set having its own advantage and disadvantage in how useful the information may be for market analysis purposes.

The mission of the Rehabilitation Research and Training Center on Disability Statistics and Demographics (StatsRRTC) is to narrow and actively bridge the divide between the producers and end users of disability statistics, thereby supporting better data collection, more accurate information, better decision-making, more effective programs, and better lives for people with disabilities (<https://researchondisability.org/statsrtc>).

RRTC statistics provide CDFIs the opportunity to conduct research using American Community Survey (ACS) data and other data to better understand disability prevalence, employment, poverty, and education rates, for their states of interest, and compare them nationally. In addition, these same statistics can be easily produced through online queries at the county level in the Annual Disability Statistics Compendium County Reports at: <https://disabilitycompendium.org/county-reports> (Note: All definitions of disability are located in these reports).

Resources and Additional Readings

Module 1 – The Role of CDFIs in the Disability Market

Additional readings related to this chapter may be accessed online via the links provided:

- CDFIs & Impact Investing: An Industry Review
http://www.lisc.org/media/filer_public/5c/07/5c07e651-c74a-4510-bcb3-1a98cac8fc71/121417_resource_report_cdfi_impact_investing_final.pdf
- CDFI Industry Analysis Summary Report (Michael Swack, Jack Northrup, and Eric Hangen, 2012)
- FIELD at the Aspen Institute's study on quality jobs: <http://www.gainfuljobs.org/>
- Reducing Income Inequality: How CDFIs Promote Job Quality (Opportunity Finance Network, September 2016): https://ofn-drupal-pub.s3.amazonaws.com/s3fs-public/QualityJobs_Layout_011217.pdf
- Impact Measurement for CDFI Small Business Lenders (Opportunity Finance Network, April 2013): https://ofn-drupal-pub.s3.amazonaws.com/s3fs-public/IMPACT_Measurement_TA_Memo.pdf
- Moving Beyond Job Creation, Defining and Measuring the Creation of Quality Jobs (Insight at Pacific Community Ventures – https://www.pacificcommunityventures.org/wp-content/uploads/sites/6/2016/04/Quality-Jobs_Moving-Beyond-Job-Creation.pdf)
- Opportunities and Challenges in Online Marketplace Lending (US Department of Treasury, May 2016):
https://www.treasury.gov/connect/blog/Documents/Opportunities_and_Challenges_in_Online_Marketplace_Lending_white_paper.pdf
- The Potential Role for CDFIs in the Opportunity Zones of the Investing in Opportunities Act (IIIO) (Charles Tansey and Michael Swack, March 2019):
<https://scholars.unh.edu/cgi/viewcontent.cgi?article=1362&context=carsey>
- Practices in Jobs Data Collection and Tracking: Lessons Learned from Create Jobs for USA (Opportunity Finance Network, October 2014):
https://ofn.org/sites/default/files/CJ4USA_CDFI_Practices_in_Jobs_Data_Collection.pdf

Supplemental Materials

Supplemental materials on the following topics related to this chapter may be accessed online via the links provided:

Statistics

- www.disabilitystatistics.org is the preeminent source for statistics. It is maintained by Cornell University which has been by NIDRR (National Institute on Disability and Rehabilitation Research)
- <https://www.ssa.gov/OACT/ssir/index.html> is the website which contains the Social Security Administration's Annual Reports on SSI. This will help your team better understand the breakdown by states and local geographies.
- <http://iod.unh.edu/Research/view-all.aspx> is maintained by the Institute on Disability at University of New Hampshire – excellent research pieces which are relevant.

Housing

There is no shortage of government and private research on housing. The following are “must reads” on this topic:

- www.ncd.gov – National Council on Disability is a bi-partisan presidential-appointed group which issues two major publications each year: one is called Progress Reports and the other is “State of Housing”. Both are large and comprehensive.
- <https://www.huduser.gov/portal/sites/default/files/pdf/Worst-Case-Housing-Needs.pdf> – HUD issues an annual report: “Worst Case Housing Needs” which includes discussions on Fair Housing and Section 811 programs.
- www.stateofthestates.org – This publication is maintained by David Braddock at the University of Colorado and is cited in most research pieces regarding housing and services for low-income people with disabilities.
- www.tacinc.org/media/52012/PricedOutin2014.pdf – The Technical Assistance Center issues this report every two years – it explains (down to local zip code) how low-income people with disabilities are “priced out” of the local rental markets based on trying to sustain themselves on SSI payments.

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- http://www.jchs.harvard.edu/sites/jchs.harvard.edu/files/connery_disabilityhousing_april2016_v2.pdf – an excellent overview of the housing issues facing people with disabilities and their families – issued April 2016 from Harvard’s Joint Center for Housing Studies.

Employment

There is a lot of information on this topic which is incorporated in the NCD Reports cited above as well as the Cornell Disability Statistics. Two additional resources are:

- <https://www.disabilitypolicyresearch.org/>: Mathematica’s Center for Studying Disability Policy is an excellent source
- Veterans: Office of Economic Opportunity, Veterans Benefits Administration (Employment statistics by Metro Area): http://www.benefits.va.gov/vow/economic_opportunity.asp

Savings

The recent passage of the ABLE Act is the most important savings tool for low-income people with disabilities. We can further discuss this in detail when we meet, but please see the following website for further information: <http://www.ndss.org/Advocacy/ABLE-Act/>

Also, your team may enjoy reading this piece which was issued last year for the 25th Anniversary of the ADA:

http://www.realeconomicimpact.org/data/files/reports/ndi_banking_status_financial_behaviors_report_2015.pdf

General Information

National Disability Organizations include:

- NOD: www.nod.org
- CCD: www.c-c-d.org
- AUCD: www.aucd.org
- AAIDD: www.aaidd.org

Module 2 – Disability History and Policy

The Medical Model and Institutionalization Resources:

- Eugenics Archives - Institutionalization
<http://eugenicsarchive.ca/discover/encyclopedia/54823635bf6466000000000001>
- Cheeseman, Nancy A. (2015). "*Understanding the History of Institutionalization: Making Connections to De-institutionalization and the Olmstead Act for Persons with Intellectual Disabilities in the State of Illinois*". Dissertations. 127.
<https://digitalcommons.ni.edu/diss/127>
- Smith, J.D. and Wehmeyer, M.L. (2012). *Good Blood Bad Blood: Science, nature, and the myth of the Kallikaks*. Washington, D.C.: American Association of Intellectual and Developmental Disabilities.

The War Veteran Effect Resources:

- Rehabilitation Services Administration (RSA):
<https://www2.ed.gov/about/offices/list/osers/rsa/people.html>
- Vocational Rehabilitation and Employment (VR&E) Services for Veterans with Disabilities:
<https://www.benefits.gov/benefit/296>

Social Security Act Resources:

- For more information about the history of the Social Security Act visit:
<https://www.ssa.gov/history/35act.html>

For more information about the SSDI program visit: (<https://www.ssa.gov/history/edberkdib.html>).

Educational Discrimination / The Ed Roberts Case Resources:

For more information about Ed Roberts' activism access the links below:

- <https://medium.com/college-while-disabled/ed-roberts-and-the-legacy-of-the-rolling-quads-db9565359aba>
- <https://news.berkeley.edu/2010/07/27/roberts/>
- <https://www.californiamuseum.org/inductee/ed-roberts>

For more information about the TRiO programs:

- <https://www2.ed.gov/about/offices/list/ope/trio/index.html>

Deinstitutionalization Resources:

- For more information about litigation supporting deinstitutionalization, review the Disability Justice webpage: <https://disabilityjustice.org/reform-and-closing-of-institutions/>
- For more information about state institution closure activities and reports and studies related to deinstitutionalization efforts, see the National Association of State Directors of Developmental Disabilities Services website: <https://www.nasddds.org/resource-library/closing-institutions/>
- For a state of the state report on the number of people with intellectual and developmental disabilities housed in state run institutions, see the Coleman Institute's brief: https://www.colemaninstitute.org/wp-content/uploads/2018/04/SOS_SABE_brief_final.pdf

The Developmental Disabilities (DD) Act Resources:

- National Association of Councils on Developmental Disabilities: <https://nacdd.org/councils/>
- Protection and Advocacy Centers and more information about priority issues: <https://www.ndrn.org/issues/employment/>
- University Centers for Excellence in Developmental Disabilities (UCEDD): <https://www.aucd.org/template/page.cfm?id=24>

Public Education Resources:

- For more information about IDEA visit: <https://sites.ed.gov/idea/>
- For more information about training and advocacy resources for students and parents, visit the Center for Parent and Information Resources: <https://www.parentcenterhub.org/find-your-center/>

The 504 Sit-In Resources:

- For more information on the passage of Section 504 of The Rehabilitation Act visit: <https://dredf.org/504-sit-in-20th-anniversary/short-history-of-the-504-sit-in/>
- For more information about the state plans for Centers for Independent Living in your area visit: <https://acl.gov/programs/centers-independent-living/list-cils-and-spils>

We Will Ride – ADAPT in Denver Resources:

- <https://history.denverlibrary.org/news/we-will-ride-origin-disability-rights-movement-denver-0>
- <https://adapt.org/we-will-ride-the-gang-of-19/>

Deaf President Now Protests Resources:

- <https://www.gallaudet.edu/about/history-and-traditions/deaf-president-now/the-issues/history-behind-dpn>
- <https://www.gallaudet.edu/about/history-and-traditions/deaf-president-now>
- https://www.youtube.com/watch?v=El_qTr3L0G0

Fair Housing Act Resources:

- For more information about the Fair Housing Act visit: https://www.hud.gov/program_offices/fair_housing_equal_opp/fair_housing_act_overview#_Who_Is_Protected?
- For more information about fair housing and other related laws visit: https://www.hud.gov/program_offices/fair_housing_equal_opp/fair_housing_and_related_law

Americans with Disabilities Act (ADA) Resources:

- To access more information about the ADA, FAQ sheets and training: <https://adata.org/>
- To contact the Regional ADA Center near you, visit: <https://adata.org/national-network>

The Olmstead Decision Resources:

- <http://www.accessiblesociety.org/topics/ada/olmsteadoverview.htm>
- <https://www.olmsteadrights.org/about-olmstead/>
- https://www.ada.gov/olmstead/olmstead_about.htm

Ticket to Work and Work Incentive Improvement Act of 1999 Resources:

- Visit state specific Medicaid programs for more details about whether a Buy-In option exists.
For FAQs about the Medicaid Buy-In program visit:
<https://nationaldisabilitynavigator.org/ndnrc-materials/fact-sheets/fact-sheet-15/>
- For information about the Ticket to Work program, visit: <https://choosework.ssa.gov/get-started-today.html>
- For more information about Partnership Plus, visit:
<https://choosework.ssa.gov/library/partnership-plus>

Higher Education Opportunity Act Resources:

- For more information about Comprehensive Transition Programs, visit:
<https://studentaid.ed.gov/sa/eligibility/intellectual-disabilities>
- For more information about college options for students with ID, visit:
<https://thinkcollege.net/college-search>

For more information about use of federal funds, including IDEA and Vocational Rehabilitation for Dual Enrollment programs, comprehensive transition, and other post-secondary options, visit:
<https://sites.ed.gov/idea/secretary-devos-makes-clear-federal-funds-can-used-support-dual-enrollment-postsecondary-options-students-youth-disabilities/>

Healthcare Policy Resources:

- For more information about the Patient Protection and Affordability Care Act, visit:
<https://www.healthcare.gov/glossary/patient-protection-and-affordable-care-act/>
- For more information about CMS Settings Rule visit:
<https://www.medicaid.gov/medicaid/hcbs/guidance/hcbs-final-regulation/index.html>

Employment and Business Development Resources:

- For information about the Workforce Innovation and Opportunity Act, visit:

<https://www.doleta.gov/WIOA/Docs/Top-Line-Fact-Sheet.pdf>

Module 3 – Core Issues

- CDFIs & Impact Investing: An Industry Review
http://www.lisc.org/media/filer_public/5c/07/5c07e651-c74a-4510-bcb3-1a98cac8fc71/121417_resource_report_cdfi_impact_investing_final.pdf
- CDFI Industry Analysis Summary Report (Michael Swack, Jack Northrup, and Eric Hangen, 2012)
- FIELD at the Aspen Institute's study on quality jobs: <http://www.gainfuljobs.org/>
- Reducing Income Inequality: How CDFIs Promote Job Quality (Opportunity Finance Network, September 2016)
- Impact Measurement for CDFI Small Business Lenders (Opportunity Finance Network, April 2013)
- Moving Beyond Job Creation, Defining and Measuring the Creation of Quality Jobs (Insight at Pacific Community Ventures - https://www.pacificcommunityventures.org/wp-content/uploads/sites/6/2016/04/Quality-Jobs_Moving-Beyond-Job-Creation.pdf)
- Opportunities and Challenges in Online Marketplace Lending (U.S. Department of Treasury, May 2016)
- The Potential Role for CDFIs in the Opportunity Zones of the Investing in Opportunities Act (IIIO) (Charles Tansey and Michael Swack, March 2019)
- Practices in Jobs Data Collection and Tracking: Lessons Learned from Create Jobs for USA (Opportunity Finance Network, October 2014)

Module 4 – CDFI Involvement – Products and Services Overview

- CDFIs & Impact Investing: An Industry Review
http://www.lisc.org/media/filer_public/5c/07/5c07e651-c74a-4510-bcb3-1a98cac8fc71/121417_resource_report_cdfi_impact_investing_final.pdf
- CDFI Industry Analysis Summary Report (Michael Swack, Jack Northrup, and Eric Hangen, 2012) <https://scholars.unh.edu/carsey/166/>
- FIELD at the Aspen Institute's study on quality jobs: <http://www.gainfuljobs.org/>
- Reducing Income Inequality: How CDFIs Promote Job Quality (Opportunity Finance Network, September 2016) https://ofn-drupal-pub.s3.amazonaws.com/s3fs-public/QualityJobs_Layout_011217.pdf
- Impact Measurement for CDFI Small Business Lenders (Opportunity Finance Network, April 2013) https://ofn-drupal-pub.s3.amazonaws.com/s3fs-public/IMPACT_Measurement_TA_Memo.pdf
- Moving Beyond Job Creation, Defining and Measuring the Creation of Quality Jobs (Insight at Pacific Community Ventures - https://www.pacificcommunityventures.org/wp-content/uploads/sites/6/2016/04/Quality-Jobs_Moving-Beyond-Job-Creation.pdf)
- Opportunities and Challenges in Online Marketplace Lending (US Department of Treasury, May 2016)
https://www.treasury.gov/connect/blog/Documents/Opportunities_and_Challenges_in_Online_Marketplace_Lending_white_paper.pdf
- The Potential Role for CDFIs in the Opportunity Zones of the Investing in Opportunities Act (IIIO) (Charles Tansey and Michael Swack, March 2019)
<https://scholars.unh.edu/carsey/362/>
- Practices in Jobs Data Collection and Tracking: Lessons Learned from Create Jobs for USA (Opportunity Finance Network, October 2014)
https://ofn.org/sites/default/files/CJ4USA_CDFI_Practices_in_Jobs_Data_Collection.pdf

Module 5 – Asset Building

- National Association of Homebuilders link: <https://www.nahb.org/en/news-and-publications/press-releases/2017/05/aging-in-place-remodeling-minor-modifications-gaining-popularity-according-to-nahb-survey.aspx>
- SSI info: <https://www.ssa.gov/ssi/text-resources-ussi.html>
- AARP Public Policy Institute. 2010a. "AARP Fact Sheet 168: Home Modifications to Promote Healthy Living." <https://assets.aarp.org/rgcenter/ppi/liv-com/fs168-home-modifications.pdf>.
- ———. 2010b. "AARP Fact Sheet 172: Housing Policy Solutions to Support Aging in Place." <https://assets.aarp.org/rgcenter/ppi/liv-com/fs172-aging-in-place.pdf>.
- AIR – American Institutes for Research. 2014. "Those with Disabilities Earn 37% Less on Average; Gap is Even Wider in Some States." <https://www.air.org/news/press-release/those-disabilities-earn-37-less-average-gap-even-wider-some-states>.
- Carlson, Dawn, Nathaniel Ehrlich, Betty Jo Berland, and Nell Bailey. 2002. "Highlights from the IDRR/RESNA/University of Michigan Survey of Assistive Technology Use and Need by Persons with Disabilities in the United States." <http://www.resnaprojects.org/nattap/library/bibl/highlights.html>.
- Carlson, Dawn, and Nat Ehrlich. 2006. "Sources of Payment for Assistive Technology: Findings from a National Survey of Persons with Disabilities." *Assistive Technology* 18 (1): 77–86. <https://doi.org/10.1080/10400435.2006.10131908>.
- Gilderbloom, John I., and John P. Markham. 1996. "Housing Modification Needs of the Disabled Elderly: What Really Matters?" *Environment and Behavior* 28 (4): 512–35. <https://doi.org/10.1177/0013916596284005>.
- Hwang, Eunju, Linda Cummings, Andrew Sixsmith, and Judith Sixsmith. 2011. "Impacts of Home Modifications on Aging-in-Place." *Journal of Housing for the Elderly* 25 (3): 246–57. <https://doi.org/10.1080/02763893.2011.595611>.
- Mann, W. C. 1999. "Effectiveness of Assistive Technology and Environmental Interventions in Maintaining Independence and Reducing Home Care Costs for the Frail Elderly: A Randomized Controlled Trial." *Archives of Family Medicine* 8 (3): 210–17. <https://doi.org/10.1001/archfami.8.3.210>.

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- Peterson, I, M Lilja, J Hammel, and A Kottorp. 2008. "Impact of Home Modification Services on Ability in Everyday Life for People Ageing with Disabilities." *Journal of Rehabilitation Medicine* 40 (4): 253–60. <https://doi.org/10.2340/16501977-0160>.
 - She, Peiyn, and Gina A. Livermore. 2009. "Long-Term Poverty and Disability Among Working-Age Adults." *Journal of Disability Policy Studies* 19 (4): 244-256. <https://doi.org/10.1177/1044207308314954>.
 - Tabbarah, Melissa, Merrill Silverstein, and Teresa Seeman. 2000. "A Health and Demographic Profile of Noninstitutionalized Older Americans Residing in Environments with Home Modifications." *Journal of Aging and Health* 12 (2): 204–28. <https://doi.org/10.1177/089826430001200204>.
 - Tanner, Bronwyn, Cheryl Tilse, and Desleigh de Jonge. 2008. "Restoring and Sustaining Home: The Impact of Home Modifications on the Meaning of Home for Older People." *Journal of Housing For the Elderly* 22 (3): 195–215. <https://doi.org/10.1080/02763890802232048>.
 - USDOL – U.S. Department of Labor. 2016. Disability Employment Statistics. <https://www.dol.gov/odep/topics/disabilityemploymentstatistics.htm>.
 - Wahl, H.-W., A. Fange, F. Oswald, L. N. Gitlin, and S. Iwarsson. 2009. "The Home Environment and Disability-Related Outcomes in Aging Individuals: What Is the Empirical Evidence?" *The Gerontologist* 49 (3): 355–67. <https://doi.org/10.1093/geront/gnp056>.
 - Moving Beyond Job Creation, Defining and Measuring the Creation of Quality Jobs (Insight at Pacific Community Ventures - https://www.pacificcommunityventures.org/wp-content/uploads/sites/6/2016/04/Quality-Jobs_Moving-Beyond-Job-Creation.pdf)
 - Opportunities and Challenges in Online Marketplace Lending (US Department of Treasury, May 2016) https://www.treasury.gov/connect/blog/Documents/Opportunities_and_Challenges_in_Online_Marketplace_Lending_white_paper.pdf
 - The Potential Role for CDFIs in the Opportunity Zones of the Investing in Opportunities Act (IIIO) (Charles Tansey and Michael Swack, March 2019) <https://scholars.unh.edu/carsey/362/>

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- Practices in Jobs Data Collection and Tracking: Lessons Learned from Create Jobs for USA (Opportunity Finance Network, October 2014)

https://ofn.org/sites/default/files/CJ4USA_CDFI_Practices_in_Jobs_Data_Collection.pdf

Module 6 – Assistive Technology

- National Association of Homebuilders link: <https://www.nahb.org/en/news-and-publications/press-releases/2017/05/aging-in-place-remodeling-minor-modifications-gaining-popularity-according-to-nahb-survey.aspx>
- SSI info: <https://www.ssa.gov/ssi/text-resources-ussi.html>
- AARP Public Policy Institute. 2010a. “AARP Fact Sheet 168: Home Modifications to Promote Healthy Living.” <https://assets.aarp.org/rgcenter/ppi/liv-com/fs168-home-modifications.pdf>.
- ———. 2010b. “AARP Fact Sheet 172: Housing Policy Solutions to Support Aging in Place.” <https://assets.aarp.org/rgcenter/ppi/liv-com/fs172-aging-in-place.pdf>.
- AIR – American Institutes for Research. 2014. “Those with Disabilities Earn 37% Less on Average; Gap is Even Wider in Some States.” <https://www.air.org/news/press-release/those-disabilities-earn-37-less-average-gap-even-wider-some-states>.
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- Gilderbloom, John I., and John P. Markham. 1996. “Housing Modification Needs of the Disabled Elderly: What Really Matters?” *Environment and Behavior* 28 (4): 512–35. <https://doi.org/10.1177/0013916596284005>.
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<https://doi.org/10.1001/archfami.8.3.210>.
 - Peterson, I, M Lilja, J Hammel, and A Kottorp. 2008. "Impact of Home Modification Services on Ability in Everyday Life for People Ageing with Disabilities." *Journal of Rehabilitation Medicine* 40 (4): 253–60. <https://doi.org/10.2340/16501977-0160>.
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<https://doi.org/10.1177/1044207308314954>.
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<https://doi.org/10.1177/089826430001200204>.
 - Tanner, Bronwyn, Cheryl Tilse, and Desleigh de Jonge. 2008. "Restoring and Sustaining Home: The Impact of Home Modifications on the Meaning of Home for Older People." *Journal of Housing For the Elderly* 22 (3): 195–215.
<https://doi.org/10.1080/02763890802232048>.
 - USDOL – U.S. Department of Labor. 2016. Disability Employment Statistics.
<https://www.dol.gov/odep/topics/disabilityemploymentstatistics.htm>.
 - Wahl, H.-W., A. Fange, F. Oswald, L. N. Gitlin, and S. Iwarsson. 2009. "The Home Environment and Disability-Related Outcomes in Aging Individuals: What Is the Empirical Evidence?" *The Gerontologist* 49 (3): 355–67. <https://doi.org/10.1093/geront/gnp056>.
 - Moving Beyond Job Creation, Defining and Measuring the Creation of Quality Jobs (Insight at Pacific Community Ventures - https://www.pacificcommunityventures.org/wp-content/uploads/sites/6/2016/04/Quality-Jobs_Moving-Beyond-Job-Creation.pdf)
 - Opportunities and Challenges in Online Marketplace Lending (US Department of Treasury, May 2016)

https://www.treasury.gov/connect/blog/Documents/Opportunities_and_Challenges_in_Online_Marketplace_Lending_white_paper.pdf

- The Potential Role for CDFIs in the Opportunity Zones of the Investing in Opportunities Act (IIIO) (Charles Tansey and Michael Swack, March 2019)
<https://scholars.unh.edu/carsey/362/>
- Practices in Jobs Data Collection and Tracking: Lessons Learned from Create Jobs for USA (Opportunity Finance Network, October 2014)
https://ofn.org/sites/default/files/CJ4USA_CDFI_Practices_in_Jobs_Data_Collection.pdf

Module 7 – Housing

- People with Disabilities Face Significant Affordability Challenges in the Rental Market – National Low Income Housing Coalition <https://nlihc.org/resource/people-disabilities-face-significant-affordability-challenges-rental-market>
- Martone, Sperling, and Sutcliffe (2017). Foreword. Technical Assistance Collaborative, Inc. and Consortium for Citizens with Disabilities task force. *Priced Out: The Housing Crisis for People with Disabilities* (p.7): <http://www.tacinc.org/media/59493/priced-out-in-2016.pdf>
- Priced Out in the United States – Technical Assistance Collaborative – <http://www.tacinc.org/knowledge-resources/priced-out-v2/>
- Social Security Benefits and Work Incentives for SSI and SSDI: <https://www.ssa.gov/redbook/documents/TheRedBook2018.pdf>
- Information for Disabled Persons – HUD – https://www.hud.gov/topics/information_for_disabled_persons
- Special Needs Alliance – Tough Choices: People with Disabilities Face Housing Crisis: <https://www.specialneedsalliance.org/blog/tough-choices-people-with-disabilities-face-housing-crisis/>
- Key Federal Housing Initiatives – The ARC – <https://thearc.org/policy-advocacy/housing/>

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- 2017 Disability Statistics Annual Report – https://disabilitycompendium.org/sites/default/files/user-uploads/2017_AnnualReport_2017_FINAL.pdf
 - Urban Institute – Using Data to Assess Fair Housing to Improve Access to Opportunity – http://www.urban.org/sites/default/files/publication/92446/using_data_to_assess_fair_housing_and_improve_access_to_opportunity.pdf
 - What is an ABLE Account? – Social Security Administration – <https://secure.ssa.gov/apps10/poms.nsf/lnx/0501130740>
 - Sustainable Development Goals – <https://sustainabledevelopment.un.org/sdgs>

Module 8 – Business Lending

Resources / Online Learning

The Veteran LLC Online Training Center: Veteran LLC offers ten video modules for aspiring entrepreneurs and business owners, which cover every aspect of small business development. From human resources and taxes, to access to capital, their video training modules provide a strong foundation of entrepreneurial knowledge to set business owners up for success. Below is an overview of the ten video modules.

Welcome to Veteran LLC | Leadership, Learning, & Capital for Military Entrepreneurs

RUN TIME 0:37 MINUTES

A special welcome message from the Veteran LLC team.

Financial Statements

RUN TIME 5:30 MINUTES

Overview of cash flow statement, profit and loss statement, and balance sheets as well as summary of startup cost analysis and definitions of assets, liabilities, and net worth.

Loan Documentation

RUN TIME 2:42 MINUTES

Review of documents commonly required by conventional and alternative lenders.

Human Resources, Networking, Business Pitching, Personal Resume

RUN TIME 6:10 MINUTES

Best practices for human resource policies, engagement with prospective customers, delivery of short business pitches, and development of an effective personal resume.

Business Planning

RUN TIME 5:07 MINUTES

Overview of business plans and necessary components: executive summary, business description, product and service description, market analysis, marketing plan, management and personnel description, etc.

Access to Capital

RUN TIME 4:10 MINUTES

Highlights of loan readiness planning, including cash flow and liquidity, equity injection, collateral, documentation, and business planning.

Credit

RUN TIME 5:10 MINUTES

Definition of the 5 C's of Credit, Overview of credit scores and reporting, details about account types and review of credit best practices.

Market Analysis

RUN TIME 3:12 MINUTES

Review of competitive analysis, market trends, client demographics, and how market research can improve your business practices.

Digital Marketing

RUN TIME 4:09 MINUTES

Best practices in social media management, email marketing, and web development for an effective online presence.

Entrepreneurship Resources

The table below summarizes additional entrepreneurship resources including national organizations that provide support and funding for businesses.

Job Accommodation Network (JAN)	Information about self-employment and starting a business from the Job Accommodation Network (JAN), a free service of ODEP. https://askjan.org/
Small Business Administration (SBA)	Federal agency that provides assistance to current and prospective small business owners. https://www.sba.gov/
Assets for Independence (AFI) Program	U.S. Department of Health and Human Services program that enables community-based nonprofits and government agencies to implement and demonstrate an assets-based approach for giving low-income families a hand up out of poverty; programs may include training on starting a business. https://www.acf.hhs.gov/ocs/programs/afi
Road to Self-Sufficiency: A Guide to Entrepreneurship for Youth with Disabilities	ODEP-funded guide that shows how entrepreneurship education can be implemented and offers suggestions on how to introduce self-employment as an option for all youth, including youth with disabilities. http://www.ncwd-youth.info/publications/road-to-self-sufficiency-a-guide-to-entrepreneurship-for-youth-with-disabilities/
Encouraging Future Innovation: Youth Entrepreneurship Education	Fact sheet describing benefits of entrepreneurship as a career option for young people with disabilities. https://www.dol.gov/odep/pubs/fact/entrepreneurship.htm
Why a Mentor is Key to Small Business Growth and Survival	Blog from the Small Business Administration on mentorship for small businesses. https://www.sba.gov/blog/mentoring-missing-link-small-business-growth-survival
SCORE Small Business Mentors	Seasoned business professionals help entrepreneurs start businesses, grow companies, and create jobs in local communities. https://www.score.org/
Self-Employment: What to Know to Be Your Own Boss	Information from the Bureau of Labor Statistics on self-employment. https://www.bls.gov/careeroutlook/2014/article/self-employment-what-to-know-to-be-your-own-boss.htm
Self-Employment Technical Assistance, Resources and Training (START-UP) Final Report: Self-Employment for People with Disabilities (PDF)	Initiated by the U.S. Department of Labor's (DOL) Office of Disability Employment Policy in 2006. This is the final report of the START-UP initiative. It describes the barriers experienced by the four grantees, the self-employment models tested, the achievements of the grant programs, and case studies of several individuals with disabilities who successfully became self-employed. https://www.dol.gov/odep/pdf/2014StartUp.pdf
Simply Speaking – Inclusive of Entrepreneurship Guidelines for SBDC Advisors	This whitepaper introduces and describes Start-Up NY and its efforts to improve disability employment in the state of New York. It discusses the four-stage "Start-Up NY Process," the economic impact, their work with veterans, success stories, and recommended tools, among other topics. http://www.nymakesworkpay.org/docs/Simply_Speaking.pdf
Northwest Access Fund	The Northwest Access Fund offers loans and IDA matching funds for business equipment entrepreneurs with disabilities. Also offers training, technical assistance, and mentoring in starting or expanding a business. http://www.nwaccessfund.org/

Module 9 – Market and Strategy Development

To learn more about topics addressed in this training and associated services available, please visit one of the national resources listed below.

NETWORK / REOURCE NAME	WEBSITE
Aging and Disability Resource Centers (ADRC)	https://acl.gov/programs/aging-and-disability-networks/aging-and-disability-resource-centers
ADA National Network	https://adata.org/
American Association of People with Disabilities (AAPD)	https://www.aapd.org/
American Association of Retired Persons (AARP)	https://www.aarp.org/
Alzheimer’s Association	https://www.alz.org/
Assistive Technology Programs	https://www2.ed.gov/policy/gen/guid/assivetech.html
Autistic Self-Advocacy Network	https://autisticadvocacy.org/
Centers for Independent Living (CILs)	https://acl.gov/programs/aging-and-disability-networks/centers-independent-living
Councils on Developmental Disabilities (CDDs)	https://acl.gov/programs/aging-and-disability-networks/state-councils-developmental-disabilities
Council of State VR Agencies	https://www.csavr.org/
National Association of the Deaf	https://www.nad.org/
National Brain Injury Association	https://www.biausa.org/
National Down Syndrome Society	https://www.ndss.org/
National Federation of the Blind	https://nfb.org/
National Association of Mental Illness	https://www.nami.org/
National Disability Institute	https://www.nationaldisabilityinstitute.org/
Protection and Advocacy Centers	https://acl.gov/programs/aging-and-disability-networks/state-protection-advocacy-systems
Statewide Independent Living Councils	https://www.ilru.org/projects/silc-net/silc-directory https://www.ncil.org/
Special Needs Alliance	https://www.specialneedsalliance.org/
University Centers of Excellence	https://acl.gov/programs/aging-and-disability-networks/national-network-university
United Cerebral Palsy	https://ucp.org/
Veteran Organizations	https://www.wehonorveterans.org/va-veteran-organizations
World Institute on Disability	https://wid.org/

Author / Presenter Biographies

Training Session Name		
Module 1—Why Not CDFIs		
Trainer's/Author's Name(s)	Charles Hammerman	Tobey Partch-Davies
Organization	National Disability Finance Coalition (NDFC)	University of New Hampshire
Bio	<p>Charles D. Hammerman is a Co-Founder, President and CEO of Disability Opportunity Fund, a national CDFI solely dedicated to advancing the needs of people with disabilities. Hammerman has held these roles since DOF's launch in 2007.</p> <p>The Disability Opportunity Fund's efforts are focused on creating a society where financing is readily available to address the gap in housing and related services for people with disabilities and their families. Hammerman brings many years of involvement with initiatives for people with disabilities and significant experience in the financial markets.</p> <p>Prior to the creation of DOF, Hammerman founded the Burton Blatt Institute (BBI) at Syracuse University, an organization to advance civic, economic, and social participation of persons with disabilities in a global society. In 2007, Hammerman was appointed Director of CDFI Initiatives at Syracuse University by Chancellor Nancy Cantor.</p> <p>Hammerman was a senior member of Private Executive Services, a division of Merrill Lynch's Global Private Client Group, which focuses on financial management for high net worth families and corporations. He also spent four years with Merrill Lynch's Equity Capital Markets division and four years in the Office of General Counsel. Before Merrill Lynch, he was an Assistant US Attorney in the Eastern District of New York and began his career as an associate at Morgan Lewis & Bockius.</p>	
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Training Session Name		
Module 2 – Disability History and Policy		
Trainer's / Author's Name(s)	Tobey Partch-Davies	Danny Housley

Organization	University of New Hampshire	Georgia Tech Center for Inclusive Design & Innovation
Bio	Tobey Partch-Davies, PhD, is a Project Director on Poverty and Disability with the UNH-Institute on Disability. Her work consists of applied research and evaluation projects focused on the social determinants of health and improvement of socio-economic status of persons with disabilities and vulnerable families. Dr. Partch-Davies pioneered much of the early work in asset building with persons with disabilities nearly two decades ago while directing the Center for Community Economic Development and Disability at the School of Community Economic Development. Since then she has carried out numerous studies, evaluations and training endeavors that have contributed to many advances in social policies and capacity improvements for the financial well-being of persons with disabilities.	Danny Housley is the Assistive Technology Acquisition Manager with Tools for Life, Georgia's Assistive Technology Act Program overseeing Credit-Able, Georgia's Alternative Financing Program. He finds funding solutions and resources for people with disabilities to increase or maintain their independence. Danny is an executive board member of the National Federation of the Blind of Georgia's Atlanta chapter, is a board member of the Disability CDFI Coalition, he serves on the board of disABILITY LINK, the Center for Independent Living that serves the Metro Atlanta area and serves on the Community Advisory Council for the Center for Leadership in Disability at Georgia State University. Previously, Danny has worked at disABILITY LINK, to support people with disabilities to live in the community of choice. Danny is a graduate of Georgia State University, where he received his MA in Applied Linguistics.
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Training Session Name	4–Core Issues	
Trainer's / Author's Name(s)	Susan Tachau	Thomas Foley
Organization	National Disability Finance Coalition (NDFC)	World Institute on Disability (WID)
Bio	Susan Tachau is a co-founder and Chief Executive Officer of the non-profit, Pennsylvania Assistive Technology Foundation (PATF), the Commonwealth's Alternative Financing Program. PATF is also a state and federally certified Community Development Financial Institution (CDFI). Ms. Tachau is a co-author of PATF's financial education book, now in its 6th edition, Cents and Sensibility: A Guide to Money Management. She also coordinates PATF's Money Club and training programs that incorporate financial education with the establishment of Individual Development Accounts and ABLE accounts. Ms. Tachau advocates on the local, state and national	Trained as a tax lawyer and financial planner, Tom leads WID's business consulting, financial inclusion, and information technology access practice. After more than 30 years of experience in the disability community, Tom authored EQUITY, the first asset building book for people with disabilities. He also serves on the Cities for Financial Empowerment Fund Board and has been recognized by numerous organizations, including the Center for Economic Development (CFED), National Disability Institute (NDI), and Center for Financial Independence and Innovation (CFII) for his financial inclusion work. Tom is a member of the American Red Cross National Diversity Advisory Council and works

	<p>levels on disability-related issues, including access to assistive technology and financing.</p> <p>Ms. Tachau serves on several Boards of Directors and advisory committees, including the National Disability Institute, the National Disability Finance Coalition, the Montgomery County Aging and Adult Services Advisory Committee, and the Technology Subcommittee of the National Council on Independent Living. Ms. Tachau received a B.A. from Colorado College, a M.A. from the Eagleton Institute of Politics at Rutgers University, and a Doctor of Humane Letters, honoris causa, from Colorado College. Ms. Tachau and her husband are the parents of three adult children, one of whom is an assistive technology user.</p>	<p>closely with national and local disaster and first responders to ensure disability inclusion in America's emergency preparation, response, and recovery efforts</p>
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Training Session Name	5—CDFI Involvement Products	
Trainer's / Author's Name(s)	Michael Swack	
Organization	University of New Hampshire	
Bio	<p>Michael Swack is a professor at the Carsey School of Public Policy at the University of New Hampshire where he directs the Center for Impact Finance and the Master's Program in Community Development, a program designed for adult practitioners. He has been involved in the design, implementation and management of a number community development lending and investment institutions both inside and outside the United States. He was the first Chairman of the New Hampshire Community Development Finance Authority (CDFA), a state-chartered equity fund for community economic development ventures and projects. He is the founding president and a current board member of the New Hampshire Community Loan Fund. He was a founding board member of the Opportunity Finance Network. In 2000 he founded, and continues to direct, the Financial Innovations Roundtable, a program that promotes new approaches and policies designed to build the field of community development finance and increase access to capital for community development intermediaries.</p>	
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Training Session Name	6—Asset Building	
Trainer's / Author's Name(s)	Tobey Partch-Davies	
Organization	University of New Hampshire	
Bio	<p>Tobey Partch-Davies, PhD, is a Project Director on Poverty and Disability with the UNH-Institute on Disability. Her work consists of applied research and evaluation projects focused on the social determinants of health and improvement of socio-economic status of</p>	

	persons with disabilities and vulnerable families. Dr. Partch-Davies pioneered much of the early work in asset building with persons with disabilities nearly two decades ago while directing the Center for Community Economic Development and Disability at the School of Community Economic Development. Since then she has carried out numerous studies, evaluations and training endeavors that have contributed to many advances in social policies and capacity improvements for the financial well-being of persons with disabilities.	
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Training Session Name	7–Assistive Technology	
Trainer's / Author's Name(s)	Susan Tachau	Jack Brummel
Organization	National Disability Finance Coalition (NDFC)	NDFC - Retired
Bio	<p>Susan Tachau is a co-founder and Chief Executive Officer of the non-profit, Pennsylvania Assistive Technology Foundation (PATF), the Commonwealth's Alternative Financing Program. PATF is also a state and federally certified Community Development Financial Institution (CDFI). Ms. Tachau is a co-author of PATF's financial education book, now in its 6th edition, Cents and Sensibility: A Guide to Money Management. She also coordinates PATF's Money Club and training programs that incorporate financial education with the establishment of Individual Development Accounts and ABLE accounts. Ms. Tachau advocates on the local, state and national levels on disability-related issues, including access to assistive technology and financing.</p> <p>Ms. Tachau serves on several Boards of Directors and advisory committees, including the National Disability Institute, the National Disability Finance Coalition, the Montgomery County Aging and Adult Services Advisory Committee, and the Technology Subcommittee of the National Council on Independent Living. Ms. Tachau received a B.A. from Colorado College, a M.A. from the Eagleton Institute of Politics at Rutgers University, and a Doctor of Humane Letters, honoris causa, from Colorado College. Ms. Tachau and her husband are the parents of three adult children, one of whom is an assistive technology user.</p>	<p>Jack Brummel is Senior Adviser and former Executive Director of Northwest Access Fund, a CDFI providing loans to people with disabilities for assistive technology, business equipment, and credit building. The Access Fund also provides financial coaching and education to people with disabilities. Jack spent 26 years with the Washington State Senate, primarily as lead staff for committees addressing economic development, financial institutions, commerce, labor, and workforce development issues. While with the Senate Jack developed legislation supporting micro-enterprise development, promoting the commercialization of university research, creating individual development accounts, and increasing employment of people with disabilities. Prior to work with the Senate, Jack was the Administrator for the Northwest Intertribal Court System and the National Director of the Law Students Civil Rights Research Council. Jack serves as the Chair of the Board for Evergreen Business Capital, a non-profit Community Development Corporation certified by the US Small Business Administration. Jack is Vice-chair of the Disability CDFI Coalition and on the Board of the Credit Builders Alliance. Jack's education includes a BA in Political Science from Washington State University, a JD from the University of Washington, and a Masters in Public Policy from the University of California, Berkeley.</p>
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Training Session Name	8—Housing	
Trainer's / Author's Name(s)	Carla Mannings	
Organization	National Disability Finance Coalition (NDFC)	
Bio	<p>Carla Mannings is the Chief Business Development Officer at Partners for the Common Good (PCG), where her primary responsibility is to serve in an executive leadership capacity for program and business development across PCG's lending program, capital fund raising, CapNexus platform, and other program initiatives. Prior to joining PCG, Ms. Mannings served as a Relationship Manager for NeighborWorks America where she advised Executive leadership of non-profit organizations located throughout the Southeast region of the United States. Other positions include serving as a Commercial Real Estate Loan Officer for Community Housing Capital where Ms. Mannings worked closely with borrowers across the nation through loan origination, underwriting and by providing project based technical assistance. Additionally, Ms. Mannings spent over 20 years in the banking industry, primarily with Wells Fargo Bank. Prior positions include Senior Commercial Loan Underwriter, Private Banking Underwriter as well as Management Consultant in the Commercial and Finance divisions of the bank. Ms. Mannings serves on several boards including National Disability Finance Coalition (Vice Chair), Opportunity Finance Network, and Women of Color of Community Development. Ms. Mannings holds a Bachelor of Arts degree from Howard University and a Masters of Business Administration from Brenau University. In her spare time, she enjoys reading, traveling, exploring the arts and volunteering in her community</p>	
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Training Session Name	9—Business Lending	
Trainer's / Author's Name(s)	Gregory Pickett	David Beck
Organization	Washington Opportunity Kapital Enterprise Advisors	National Disability Finance Coalition (NDFC)
Bio	Formally credit trained professional with over 30 years of commercial, small business and community development finance experience.	<p>David Beck is Director of Policy at Self-Help, a nationally recognized CDFI whose mission is to create and protect ownership opportunities for all. He coordinates Self-Help's policy work on a range of community development policy issues, including mortgage lending, small business lending and lending to non-profits. He serves on the He also serves on the CDFI Disability Coalition Board of Directors and helps lead Self-Help's, North Carolina Assistive Technology Financing Program. Most recently he has become heavily engaged in equitable food system policies, building off learnings from Self-Help's Healthy Foods Financing Initiative work. He also coordinates with Self-Help's affiliate the Center for Responsible Lending</p>

		having helped initiate Self-Help's anti-predatory lending policy work. David also serves on the Opportunity Finance Network board of directors and is a founding member of the New Markets Tax Credit Coalition. He also is on the Housing Partnership Network Policy Committee and the Carolinas Credit Union League Government Affairs Committee and previously served on the CDFI Coalition board. David has worked at Self-Help since 1998. Prior to that he was a director at a legislative monitoring firm and worked for Rep. David Price in Washington. He is a graduate of the University of North Carolina at Chapel Hill and is based in Self-Help's Durham, NC headquarters.
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Training Session Name	10–Market and Strategy Development	
Training Session Name	Michael Swack	
Trainer's / Author's Name(s)	University of New Hampshire	
Bio	Michael Swack is a professor at the Carsey School of Public Policy at the University of New Hampshire where he directs the Center for Impact Finance and the Master's Program in Community Development, a program designed for adult practitioners. He has been involved in the design, implementation and management of a number community development lending and investment institutions both inside and outside the United States. He was the first Chairman of the New Hampshire Community Development Finance Authority (CDFA), a state-chartered equity fund for community economic development ventures and projects. He is the founding president and a current board member of the New Hampshire Community Loan Fund. He was a founding board member of the Opportunity Finance Network. In 2000 he founded, and continues to direct, the Financial Innovations Roundtable, a program that promotes new approaches and policies designed to build the field of community development finance and increase access to capital for community development intermediaries.	
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Acronym List

Acronym	Definition
AARP	American Association of Retired Persons
ABA	American Bankers Association
ABLE	Achieving a Better Life Experience
ADA	Americans With Disabilities Act
ADAPT	Americans Disabled for Access to Public Transit
ADD	American Dream Demonstration
AFIFA	Assets for Independence Act
AFP	Alternative Financing Programs
AIR	American Institutes for Research
AMI	Area Median Income
ASL	American Sign Language
AT	Assistive Technology
ATA	Assistive Technology Act
CART	Communication Access Real-time Translation
CCIM	Certified Commercial Investment Member
CDC	Centers for Disease Control and Prevention
CDFA	Council of Development Finance Agency
CDFI	Community Development Financial Institutions
CEDC	Cabrillo Economic Development Fund
CFII	Center for Financial Independence and Innovation
CILs	Centers for Independent Living
CMS	Centers for Medicaid and Medicare Services
CTP	Comprehensive Transition Programs
CVAA	Century Communications and Video Accessibility Act
DD	Developmental Disabilities
DFCP	Development Finance Certified Professional
DME	Durable medical equipment
DOF	Disability Opportunity Fund
EDC	Economic Development Center/Education Code
EPE	Extended Period of Eligibility
FDIC	Federal Deposit Insurance Corporation
FICA	Federal Insurance Contributions Act
HEOA	Higher Education Opportunity Act
HUD	Housing and Urban Development
IDA	Individual Development Accounts
IDEA	Individuals with Disabilities Education Act
IHSS	In-Home Supportive Services
ITSP	Individual Training and Services Plan
JAWS	Job Access With Speech
LEED	Leadership in Energy and Environmental design
NCALL	National Council on Agricultural Life and Labor
NCAT	North Carolina Assistive Technology
NDC	National Development Council
NWAF	Northwest Access Fund
P&A	Protection and Advocacy
PASS	Plan to Achieve Self-Support
PATF	Pennsylvania Assistive Technology
PT Jobs	Part Time Jobs
PWDs	People with Disabilities
RACs	Refund Anticipation Checks
RALs	Refund Anticipation Loans
RMA	Risk Management Association

Acronym	Definition
RSA	Rehabilitation Services Administration
SNAP	Supplemental Nutrition Assistance Program
SNT	Special Needs Trust
SSA	Social Security Act
SSDI	Social Security Disability Insurance
SSI	Supplemental Security Income
TA	Technical Assistance
TAC	Technical Assistance Collaborative
TANF	Temporary Assistance to Needy Families
TCE	Tax Counseling for the Elderly
TTY/TDD	Text Telephone/Telecommunication Device
TWP	Trial Work Period
TWWIIA	Ticket to Work and Work Incentive Improvement Act
UCEDs	University Centers for Excellence in Disabilities
UPIAS	Union of Physically Impaired Persons Against Segregation
USDOL	US Department of Labor
VITA	Volunteer Income Tax Assistance
VR	Vocational Rehabilitation
VR&E	Vocational Rehabilitation and Employment
WCAG	Web Content Accessibility Guidelines
WIS	Work Incentive Specialists
WISA	Work Incentives Specialist Advocates
WOIA	Workforce Opportunity Improvement Act
WWII	World War II