



**CONSORTIUM FOR CITIZENS
WITH DISABILITIES**

December 27, 2016

Electronic submission to www.regulations.gov

Regulations Division
Office of General Counsel
Rules Docket Clerk
Department of Housing and Urban Development
451 7th Street SW
Room 10276
Washington, DC 20410-0500

Re: Proposed Rule on Tenant-Based Assistance: Enhanced Vouchers FR-5585-P-01

To Whom It May Concern:

Thank you for the opportunity to comment on the Proposed Rule “Tenant-Based Assistance: Enhanced Vouchers” Docket Number FR-5585-P-01 (October 26, 2016). Please accept this letter as the comments of the Co-Chairs of the Consortium for Citizens with Disabilities (CCD) Housing Task Force. CCD is a working coalition of national consumer, advocacy, provider, and professional organizations working together with and on behalf of the approximately 57 million children and adults with disabilities and their families living in the United States. CCD advocates for national public policy that ensures full equality, self-determination, independence, empowerment, integration and inclusion of children and adults with disabilities in all aspects of society.

We concur with the comments submitted to HUD by the National Housing Law Project (NHLP) on behalf of themselves and the Housing Justice Network (HJN). We **highlight** two issues in particular below.

Tenant Rescreening

The CCD Housing Task Force concurs with the NHLP and HJN comments regarding tenant screening; the language about rescreening and reference to 24 CFR 982.552 and 24 CFR 982.553 in the proposed rule are illegal and inappropriate and should be removed.

Unit Size

The CCD Housing Task Force concurs with NHLP and HJN comments regarding unit size. In particular, the CCD Housing Task Force is concerned that tenants with disabilities who require a larger unit size for a disability-related reason are provided a reasonable accommodation as required by 24 CFR Part 8. This

would include the provision of an enhanced voucher that allows the household to continue to remain in a larger size unit or to secure such a unit if the household had not already been able to do so. Disability-related reasons include but are not limited to as household requiring a live-in aide or an extra bedroom to store large pieces of medical equipment used on a regular or interim basis.

Thank you for the opportunity to comment on the Proposed Rule “Tenant-Based Assistance: Enhanced Vouchers” Docket Number FR–5585–P–01 (October 26, 2016).

Sincerely,

Andrew Sperling, National Alliance on Mental Illness
Co-Chair, CCD Housing Task Force

T.J. Sutcliffe, The Arc of the United States
Co-Chair, CCD Housing Task Force