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Regulations Division
Office of General Counsel
U.S. Department of Housing and Urban Development
451 7th Street, SW
Washington, D.C. 20410

RE: Docket No. FR-6529-I-01; Revocation of the 30-Day Notification Requirement Prior to Termination of Lease for Nonpayment of Rent

Thank you for the opportunity to comment on the Department of Housing and Urban Development (HUD)'s proposed rule, "Revocation of the 30-Day Notification Requirement Prior to Termination of Lease for Nonpayment of Rent." The undersigned are co-chairs of the Consortium for Constituents with Disabilities (CCD) Housing Task Force. CCD is the largest coalition of national organizations working together to advocate for federal public policy that ensures the self-determination, independence, empowerment, integration, and inclusion of children and adults with disabilities in all aspects of a society free from racism, ableism, sexism, and xenophobia, as well as LGBTQ+ discrimination and religious intolerance. The Housing Task Force works to ensure that all people with disabilities have safe, stable, accessible, affordable, and integrated housing that enables people to live in communities of their choosing, with full access to home and community-based services and supports.

We strongly oppose this proposed rule to rescind eviction protections in HUD-assisted housing. HUD should retain its current 30-Day Notice Rule, which requires covered housing providers to provide a 30-day notice and cure period before terminating leases for nonpayment of rent.

Evidence is clear that eviction is linked to devastating short- and long-term consequences for families and individuals, including for people with disabilities. Approximately 19% of Public Housing and 36% of Project-Based Rental Assistance (PBRA) households include people with disabilities.¹ HUD housing assistance enables people with disabilities to live independently in the community in stable housing. Without assistance, many would be at high risk of institutionalization or homelessness.

Prior to HUD's 2024 final 30-Day Notice Rule (and the related 2021 Interim Final Rule), HUD regulated evictions based on nonpayment of rent only for certain HUD programs. Timing of eviction notices and cure periods were often subject to varying state and local requirements. For example, HUD regulations for PBRA programs only required 30 days' notice for a termination of tenancy for "other good cause," (i.e. terminations not based on nonpayment). State and local laws governed notice and cure periods for nonpayment cases. Meanwhile, HUD required Public Housing programs to provide a 14-day notice

¹ GAO, "HUD Rental Assistance: Serving Households with Disabilities" (March 2023), available at <https://www.gao.gov/assets/gao-23-106339.pdf>.

before lease terminations for nonpayment of rent.

The 2024 Final Rule streamlines notice requirements, and it prevents unnecessary evictions by allowing more time for households to resolve nonpayment issues. This longer notice and cure period is especially critical for people with disabilities. People with disabilities may, for example, need to request reasonable accommodations related to their nonpayment case. They may rely on different service providers, such as case managers or service coordinators, to help them resolve issues. These and other factors require disabled people needing more time to respond to notices and address problems that could lead to eviction.

Studies have shown that evictions cause housing instability, an increased risk of homelessness, loss of employment, and physical and mental health issues, along with other negative consequences.² If people with disabilities lose their housing – particularly subsidized housing – they face steep barriers to regaining housing stability. Disabled people, particularly those with low incomes, face a national shortage of accessible and affordable housing.³ People with disabilities often have few financial resources, remain among the country’s lowest-income households, and far too frequently encounter discrimination when trying to seek or maintain housing.⁴

We strongly urge HUD to withdraw this proposed rule and retain the current 30-Day Notice Rule.

The 30-Day Notice Rule is reasonable, promotes consistency across programs, and prevents evictions and the associated human, societal and financial costs.

Sincerely,

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² See, e.g., Jack Tsai, et al., “Longitudinal Study of the Housing and Mental Health Outcomes of Tenants Appearing in Eviction Court” (Sept. 2021), available at <https://pubmed.ncbi.nlm.nih.gov/32926182/>.

³ See, e.g., U.S. Dept. Of Housing and Urban Development, “Worst Case Housing Needs: 2023 Report to Congress” (2023) at <https://www.huduser.gov/portal/publications/Worst-Case-Housing-Needs-2023.html>.

⁴ See, e.g., National Fair Housing Alliance, “2024 Fair Housing Trends Report” (2025), at <https://nationalfairhousing.org/resource/2024-fair-housing-trends-report>; U.S. Dept. of Housing and Urban Development, “Rental Housing Discrimination on the Basis of Mental Disabilities: Results of Pilot Testing” (2017), at <https://www.huduser.gov/portal/publications/MentalDisabilities-FinalPaper.html>.