



April 20, 2023

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

RE: FR-6250-P-01 Affirmatively Furthering Fair Housing

To Whom It May Concern:

Thank you for the opportunity to comment on the Affirmatively Furthering Fair Housing (AFFH) proposed rule FR-6250-P-01. Please accept this letter as the comments of the Co-Chairs of the Consortium for Constituents with Disabilities (CCD) Housing Task Force and the CCD Rights Task Force. The Consortium for Constituents with Disabilities, headquartered in Washington DC, 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 society. Since 1973, CCD has advocated on behalf of people of all ages with physical and mental disabilities and their families. CCD has worked to achieve federal legislation and regulations that assure that the millions of children and adults with disabilities are fully integrated into the mainstream of society.

We support HUD's efforts to faithfully implement the AFFH mandate and the proposed AFFH Rule overall. We appreciate HUD's efforts to highlight the importance of integration of people with disabilities in accordance with the Supreme Court's decision in *Olmstead v. L.C.*, and to address some of CCD's concerns regarding the limitations of nationally uniform data to describe the housing needs of people with disabilities, especially those persons living in group quarters and institutional settings. Our comments focus on areas of particular concern to people with disabilities.

We support the balanced approach to achieving fair housing goals as defined in this rule. For people with disabilities, access to housing vouchers, even those specifically set aside for people

with disabilities, can be difficult due to lengthy waitlists. Too often, once a voucher is in hand, people with disabilities face discrimination when seeking housing in the community. For people subject to race-based discrimination, this scenario is even worse, See [Black and Disabled? Good Luck Finding Affordable Housing - Word In Black](#). Geographic limitations on housing tools such as vouchers can increase the concentration of racial and income segregation in neighborhoods and limit people to living in communities that have been divested of vital community assets. For example, if a disabled person has a Mainstream Voucher, landlord unavailability, and accessible unit unavailability, may render that person without an option to utilize that voucher unless they can travel.

Here, we provide some specific feedback on select questions posed in this proposed AFFH rule:

3. HUD intends to continue to provide much of the same data it made available in connection with the implementation of the 2015 AFFH Rule through the AFFH-T, which is available at <https://egis.hud.gov/affht/>, while exploring possible improvements to the existing AFFH-T Data & Mapping Tool. HUD is also exploring other approaches to facilitating program participants' data analysis and making HUD-provided data as useful and easy to understand as possible for program participants and the public.

b. What additional data and tools could HUD provide to facilitate a regional analysis?

CCD HTF understands that with this proposed Rule HUD is trying to streamline the required data analysis. However, streamlining should not come at the cost of omitting key disability data, especially where such data is made available for other protected classes. Specific examples include:

Table 2 Demographic Trends: The HTF understands that because the current disability questions were only added to the Census in 2008, trending demographics cannot be provided as they are for race in the readily available Table 2. However, we request that this explanation as to why the data is not available be specifically added to Table 2 or other guidance so that when jurisdictions are responding to required questions in 5.154 (d) (1), they understand they will have to secure local data or local knowledge, rather than simply skip over disability because HUD does not provide the data in Table 2.

c. What types of data relating to homeownership opportunities should HUD consider providing? In addition to data on homeownership rates, which already are available in the consolidated planning data (CHAS) (which can be accessed at <https://www.huduser.gov/portal/datasets/cp.html>), including by protected class, what other data sources are reflective of disparities in homeownership opportunity?

Table 16 Homeownership: As discussed elsewhere in these comments, and acknowledged by HUD in the preamble, people with disabilities have lower rates of homeownership. We request that the homeownership statistics for people with disabilities, by age, is included in Table 16 or a similar table. We are requesting this be included by age because we anticipate the rates for

disabled people over 65 are higher than under 65 because many of those over 65 were homeowners long before they became disabled.

d. What other data sources should HUD provide for program participants to better identify the various types of inequity experienced by members of protected class groups that are the subject of the proposed rule's required analysis?

Tables 9 and 10 Housing Problems and Severe Rent Burden: Housing problem and cost burden data is not provided for disability in these tables. This data is needed to respond to required questions in 5.154 (d) (5). Unlike Table 2, however, the HTF believes this data is available for disability because this data has been used biennially by HUD in the Worst-Case Housing Needs Report. Tables 9 and 10 should include disability related data.

g. Are there additional data sets HUD could provide or require to be used for purposes of conducting a fair housing analysis that relate to eviction, neighborhood features (access to parks, green space, trees), zoning and land use, and housing-related costs (like transportation)?

Table 12 Opportunity Indicators: As described elsewhere in these comments, access to transportation is critical for disabled people to participate fully in the community. While the question is included in 5.154 (d) (4) (iii), it should also be included in this Table in order to better ensure all jurisdictions include this data in their analysis and consideration of goals, priorities and strategies.

4. Are there different or additional regulatory changes HUD could make to the proposed rule that would be more effective in affirmatively furthering fair housing, including ways to improve access to community assets and other housing-related opportunities for members of protected class groups, including historically underserved communities, individuals with disabilities, and other vulnerable populations?

Other regulatory guidance should consider incorporating a role for Housing Ambassadors/Navigators in their regions. This role can help with applications and materials from people with disabilities, which can sometimes be a barrier in timely competing for available housing, identifying available or soon to be available accessible housing within a jurisdiction, and/or working with landlords to make accommodations to units that would otherwise be suitable for applicants with disabilities.

We suggest adding two questions in §5.154 Content Analysis - Public Housing Agencies:

1. Does the Public Housing Authority include a mechanism to ensure that notice of reasonable accommodation is provided, that accommodations are made available to residents, and implemented?
2. Does the Public Housing Authority ensure that the application process in the covered jurisdictions are accessible to persons with disabilities including persons with cognitive, visual, hearing, and physical disabilities?

Equity Plans can include seeking technical assistance from HUD on these matters.

5. In what ways can HUD assist program participants in facilitating the community engagement process so that the Equity Plans program participants develop are comprehensive and account for issues faced by members of protected class groups and underserved communities that program participants may not necessarily be aware of? HUD specifically seeks feedback on the following:

a. Should HUD require that a minimum number of meetings be held at various times of day and various accessible locations to ensure that all members of a community have an opportunity to be heard? Should HUD require that at least one meeting be held virtually?

Yes, multiple meetings should be provided in different locations and at different times throughout the day and week. The disability community specifically requires locations that are physically and geographically accessible. Persons who use wheelchairs or other mobility devices need a building that is physically accessible. If the only location lacks such access, HUD will lose out on the perspective of an entire population. Similarly, many members of the disability community rely on public transportation. As a result, the meeting locations should strategically be located in easily accessible locations close to bus stops or other public transit. Again, if they are challenging locations to get to, this community will be unable to participate.

Second, at least one meeting should be held virtually to allow other members of the disability community to participate. Closed captioning is strongly recommended for these meetings, as well as the opportunity to request translation services for people who are Deaf or hard-of-hearing. There are many persons with disabilities who may be unable to attend in person. As just discussed, if public transit is inaccessible, some persons may not be able to travel to the meetings. Or, persons who are immunocompromised may be unable to attend a meeting in person. As a result, alternative options are necessary. As best practice, many opportunities in different timeframes and locations should be provided to recruit as broad a cohort of participants to collect the best data possible.

c. Should HUD require program participants to utilize different technology to conduct outreach and engagement? If so, which technologies have proven to be successful tools for community engagement? Are these technologies usable by individuals with disabilities, including those who utilize assistive technology or require reasonable accommodations such as real-time captioning or sign-language interpreters?

As it pertains to accommodating participants with disabilities, it is always essential that planners adopt a multi-modal approach. Although an accommodation may work for one participant with a disability, it does not mean that it will accommodate all members of the disability community. In fact, even people with the same disability may still require different accommodations. As a result, different options should be provided to ensure that all participants have full access to the process. A multi-modal approach should also be used for outreach purposes. Because different outreach and media platforms are more or less accessible based on assistive technology and other features, HUD should apply different approaches to reach the largest number of

participants. In other words, HUD should not necessarily adopt only one form of communication and stop there.

At the most basic level, some technologies have proven to be more user friendly to persons with disabilities than others. For instance, zoom has generally been said to be more accessible and usable by persons with disabilities in comparison to other platforms such as Teams. Before HUD decides what online platform to use, it should reach out to the disability community to learn which platforms are most accessible and widely utilized. Even the formatting of online materials should be considered. PDF documents are known to be more difficult to read with screen reading software than word documents.

As stated before, information provided should be provided in multiple ways. So, if information is provided online through platforms like YouTube or other video providers, to accommodate people who are deaf, DeafBlind, or persons who are not proficient in English, the videos should be captioned in multiple languages, provide translations into American Sign Language, and have a written transcript of the video provided.

Finally, in the era of social media, HUD can use such platforms to reach participants. The disability community is still just as likely to use such websites and applications as their nondisabled peers. However, programs must consider different accommodation needs and barriers. Some social media sites are more accessible for one disability group than the other. As a result, multiple applications should be used so people have options. Additionally, sites like Instagram are inherently visual so they should include alt tags and visual descriptions. Tiktok has an option to caption its content. Producers must always use this function. The technology exists; it just must be used wisely.

d. Has HUD sufficiently distinguished the differences between community engagement and citizen participation or resident participation such that program participants understand that HUD expects a more robust engagement process for purposes of the development of the Equity Plan than has previously been required for purposes of programmatic planning? How can HUD ensure that these important conversations are fully had within communities while not significantly increasing the burden on program participants and the communities themselves? Are there ways in which HUD can reduce any unnecessary burden resulting from separate requirements to conduct community engagement and citizen participation (for consolidated plan program participants) or resident participation (for PHAs)?

We urge HUD to remove provisions of the proposed rule that would allow program participants to combine the Equity Plan community engagement process with other community, resident, or citizen engagement required for other HUD programs and planning processes. We believe that such a combination would result in too much confusion for members of the public. In soliciting community engagement for combined processes, program participants may not sufficiently distinguish and highlight the opportunity to provide input on Equity Plans. Therefore, many stakeholders in the disability community who do not ordinarily participate in other HUD planning processes may not participate in these engagement opportunities because they do not understand the unique opportunity to provide feedback on AFFH planning.

As described in the preamble, for Equity Plans, program participants should consult with groups representing people with disabilities, such as Centers for Independent Living, Protection & Advocacy Agencies, Aging and Disability Resource Centers, and Councils on Developmental Disabilities. We request that HUD include a reference to these agencies in the rule itself or at least in sub-regulatory guidance. Equity Plan attachments should also list the organizations that participated in the community engagement process.

Finally, we recommend that the community engagement section of the AFFH Rule describe program participants' obligations to provide accommodations for persons with disabilities and language assistance for persons with limited English proficiency. Section 5.158(a)(7) refers to Title VI, Section 504, and the ADA, but offers no further details. HUD should explain more fully how program participants can comply with these civil rights laws.

e. Are there specific types of technical assistance that HUD can provide to assist program participants in conducting robust community engagement, including how community engagement can inform goal setting, implementation of goals, and progress evaluations? If so, please specify the types of technical assistance that would be most useful.

HUD should provide technical assistance on working with the disability community in the most effective way. Much of disability culture is unknown to the general populations. As a result, when an outside group is hoping to engage with the disability community, they may approach the project with preconceived ideas that will inadvertently impact the final product of the conversation. HUD should provide technical assistance on things like disability etiquette and creating accessible documents. Additionally, basic exposure to things like assistive technology will equip program leads on how persons with disabilities access the world. When the program leads have a greater grasp of how things work for people with disabilities, the conversations may be more fruitful. Organizations like the ten regional offices of the ADA National Network may be able to provide such technical assistance.

f. Should HUD require the community engagement process to afford a minimum amount of time for different types of engagement activities (e.g., public comments on proposed Equity Plans, notice before public meetings)? If so, what should the minimum amount of time be in order to afford members of the community an equal and fair opportunity to participate in the development of the Equity Plan?

Yes, after each community engagement meeting, participants/public should be allowed an opportunity to submit comments on the information that was presented. We recommend 15 days.

We recommend at least 60 days for public comments on proposed Equity Plans.

8. HUD requests commenters provide feedback on new § 5.154, which sets out the content of the Equity Plan. HUD specifically requests comment on the following:

a. Are the questions in this proposed rule at § 5.154 effective for purposes of how to assess where equity is lacking and to facilitate the development of meaningful goals that are designed

and can be reasonably expected to overcome the effects of past or current policies that have contributed to a systemic lack of equity? Put differently, do the proposed questions clearly elicit from program participants an assessment of the fair housing issues that exist and their causes so that goals can be appropriately tailored to address the identified fair housing issues?

b. Does the analysis in proposed § 5.154 lend itself to identifying fair housing issues for each of the following protected class groups: race, color, national origin, sex, religion, familial status, and disability? If not, how can HUD improve this aspect of the analysis to better serve this purpose? Are there additional data sources that would assist in facilitating this analysis?

The HUD provided data in Tables 13 and 14 does allow a jurisdiction to map out the location of households by disability type. This data can provide important insights for furthering fair housing in some communities (see for example [link to Access Living news article](#)). The definition of “integration” in the proposed rule, however, states that “for individuals with disabilities, integration also means that such individuals are able to access housing and services in the most integrated setting appropriate to the individual’s needs.” None of the HUD provided data nor the specific questions that HUD requires jurisdictions to ask as part of the equity plan development, 24 CFR 5.154 (d)(2) “Segregation and integration” goal category, will help to determine the extent to which disabled people are integrated as intended by the ADA, S. 504 and *Olmstead*. HUD must include at least one additional question in 24 CFR 5.154 (d)(2):

“Using state and local data and knowledge, to what extent are disabled people integrated in the community (as defined in the Rule) or remain segregated? Which direction has this been trending?”

We urge HUD to not only include this question but to provide specific additional guidance as to where such information can be obtained; we understand such detailed guidance would be provided outside of the rule. But without such guidance, the real analysis and thought that HUD is hoping will result from this streamlined Rule will not happen for disabled people who are stuck in institutional settings. Guidance should direct the jurisdiction to contact their state’s Money Follows the Person Program [Money Follows the Person | Medicaid](#) and/or Medicaid office, the state’s Developmental Disabilities Council, and to review the US DOJ’s ADA web page to determine whether there is any pending or settled *Olmstead* litigation in the state. All of this is in addition to required engagement with local disability organizations such as The Arc, CILs, NAMI, and other local disability organizations.

We would also urge HUD to provide additional guidance related to how jurisdictions can determine whether the need for accessible housing has been met or not. This guidance could include a review of the waiting lists for accessible units in public and HUD-assisted housing and Low Income Housing Tax Credit properties, a review of the state-funded housing search databases used by many state housing agencies and which include accessible housing (assisted and unassisted), and whether there are any outstanding lawsuits regarding residential accessibility, as well as local data and knowledge obtained through engagement with disability and affordable housing agencies in the jurisdiction.

c. What additional areas of analysis, if any, should HUD include in § 5.154 that are not currently included in this proposed rule?

For the analysis of barriers for people with disabilities, HUD should require program participants to analyze barriers to not only employment, but also access to other income supports and public benefits. Many people with disabilities, including older adults, are unable to work full time and rely on benefits such as Supplemental Security Income (SSI) and Social Security Disability to pay for housing costs and meet basic needs. Public benefits are also often a critical source of support for families taking care of children with disabilities.

e. This proposed rule does not currently identify which specific maps and tables contained in the HUD-provided data program participants should rely on in answering specific questions provided at § 5.154. Should HUD require the use of specific data sets when responding to these questions in § 5.154, and if so, what benefit would that have? How can HUD ensure that program participants, in using the HUD-provided data, identify the fair housing issues and underlying reasons for what the data show in order to assess where equity is truly lacking in their geographic areas of analysis?

Transportation is an extremely important feature for people with disabilities. Equity plans should specifically address the current state of transportation in their geographic areas, and a plan to elevate the assessment with partners such as local departments of transportation, planning boards, and local disability groups in order to reduce barriers.

Housing disabled people in communities without public transportation options would mean that driving or paying for private taxi service is necessary to access medical appointments, family, work, etc. Communities that have some transportation systems, but poorly operate specialty services, such as transportation for the elderly and disabled, still pose a barrier to full participation in the community. Housing communities that are intentional about transportation planning have more success than those where transportation needs for populations such as the elderly and disabled is an afterthought See [Transportation Patterns and Problems of People with Disabilities - The Future of Disability in America - NCBI Bookshelf \(nih.gov\)](#) .

17. Has HUD adequately incorporated the need to assess any lack of homeownership opportunities for protected class groups in this proposed rule? If not, in what ways should access to homeownership be further incorporated? Is there specific data that HUD could provide to further facilitate this analysis?

As described above, Table 16, useful readily available data for communities to assess needs, includes homeownership rates by race/ethnicity but not for disability or other protected characteristics. In the preamble, HUD acknowledges this gap (see page 8527 of Federal Register) but does not address it. Data on homeownership rates by people with and without disabilities should be included in a readily available Table.

HUD can assess and further homeownership opportunities and barriers for people with disabilities as part of its plan to combat pervasive residential segregation impacting disabled

people, and particularly disabled people subject to historic and persistent racism. We encourage HUD to incentivize PHAs to implement the homeownership option with Housing Choice Vouchers. Given the scarcity of affordable and accessible housing, we recommend removing the portability limitations attached to the mortgage vouchers ([holders can only move to jurisdictions with a homeownership program and currently accepting new families into the program](#)).

Equity Plans should address homeownership tools for disabled people such as the mortgage voucher program and financing programs to help secure initial loans. HUD should provide technical assistance and guidance around best practices in disabled homeownership tools. For example, the [HomeAbility](#) program in Maryland is a great example because 1. It is specifically for disabled people, 2. Provides 95% in the first lien and up to 25% in a second lien to assist with downpayment and closing costs, and 3. Allows expanded income limits so that disabled borrowers and a caregiver can borrow together.

19. How can HUD best facilitate receiving feedback on Equity Plans submitted for its review from members of the public in order to inform the review process and how should HUD consider such feedback? HUD seeks comment on whether changes to the regulatory text are necessary, and specifically whether the new definition of “publication” at § 5.152 and the provisions in § 5.160 achieve this objective.

To facilitate receiving feedback on Equity Plans, we urge HUD to offer resources – including resources developed by advocacy organizations – to help members of the public understand how they can submit feedback and for what purpose. We also recommend that HUD require program participants to inform stakeholders during the community engagement process about the opportunity to submit feedback to HUD. Program participants should also notify stakeholders about the submission date for Equity Plans since members of the public only have 60 days from that date to provide HUD with comments.

In considering feedback, HUD should evaluate comments in light of the goals of the AFFH mandate. To the extent that comments seek to undermine the mandate’s goals, HUD should weigh those comments accordingly.

With regard to the definition of *publication*, HUD should add that publication means the timely public online posting of Equity Plans. Timely postings will help ensure that members of the public can see the final Equity Plans submitted to HUD before the deadline to submit feedback. We also urge HUD to ensure that postings are searchable as well as accessible (PDF documents that are accessible with screen readers, for example).

29. A large amount of Federal funding flows through States to local jurisdictions, and HUD is interested in hearing about how States can utilize those funds to affirmatively further fair housing. HUD recognizes the unique planning responsibilities of States, as well as the wide variation in data, including with respect to the varying sizes and geographies of States (e.g., urban and rural areas). HUD specifically seeks comment on the data needs and tools that may be useful to States in conducting their Equity Plans.

States receive significant federal funding in the form of public benefits (SSI, SNAP food benefits, and Medicaid, for example), and these safety net programs can help to increase affordable housing opportunities for people with disabilities. Yet too many people with disabilities face barriers to accessing these critical benefits and experience housing insecurity or homelessness as a result. States should ensure equity in benefits access and maximize the federally-funded benefits that these households receive by removing administrative and other barriers that prevent access and/or lead to wrongful benefit denials and terminations. HUD should consider coordinating with other federal agencies to provide resources on various benefit programs' policy and process options to streamline enrollment and reduce burdens on applicants and enrollees. Further, states could improve access to these benefits by investing in programs that provide benefits advocacy for people with disabilities. SOAR (SSI/SSDI Outreach, Access, and Recovery) Programs, for instance, increase access to SSI/SSDI cash benefits for people who have serious mental health issues or other disabilities and are at risk of or experiencing homelessness.

Medicaid funds in particular are critical and can be used in various ways to advance Olmstead goals and fair housing for people with disabilities. For example, states can use Medicaid to deliver housing-related supports, such as services in Permanent Supportive Housing. Medicaid Home and Community-Based Services (HCBS) are also vital for people with disabilities at risk of institutionalization, providing supports such as personal care assistance and home health services that enable independent living in the community. Some states are also using Medicaid managed care contracts to encourage Managed Care Organizations (MCOs) to support their members' housing needs by, for instance, employing housing coordinators and funding legal assistance for eviction prevention. States should explore these and other options to leverage Medicaid funding to meet fair housing goals, and they should strengthen collaboration between their Medicaid and housing agencies to meet the housing needs of people with disabilities. HUD should also provide technical assistance and resources on relevant federal Medicaid guidance and Medicaid authorities that states can use to pay for housing-related services.

31. Certain definitions in this proposed rule contain language explaining how the defined term applies to the analysis required by § 5.154 and the type of analysis that HUD expects to be included in an Equity Plan. HUD seeks comment on whether the inclusion of this type of language in the regulations is helpful and provides additional clarity regarding how the defined term should be used for purposes of developing an Equity Plan.

We strongly support the definitions in this proposed rule that incorporate the needs of people with disabilities. We appreciate HUD's recognition that fair housing includes opportunities for people with disabilities to live in the most integrated setting appropriate to their needs, in accessible housing with voluntary supports and services. We support the inclusion of disability-focused language in the definitions of *affordable housing opportunities*, *fair housing choice*, *integration*, *segregation*, and *community assets*, and we urge HUD to include these references to disability in the definitions of these terms in the final rule.

The definition of "underserved" is a concern, however. The definition is critical as the proposed regulation states that "When prioritizing fair housing issues, program participants must give

consideration to fair housing issues faced by underserved communities that have historically been denied fair housing choice, isolated in racially or ethnically concentrated areas of poverty or other segregated settings, and subjected to disparities in access to opportunity, including the opportunity to live in well-resourced areas, the opportunity to enjoy equal access to community assets, and access to homeownership opportunities” (Federal Register page 8566). As evidenced in these comments and in the preamble to the proposed rule itself, people with disabilities meet this definition. Additionally, Executive Order 14091, “Further Advancing Racial Equity and Support for Underserved Communities Through the Federal Government,” commits the federal government to advancing equity for people with disabilities, as well as older adults. We urge HUD to add older adults and disabled people to the examples listed in the definition of “Underserved Communities”. We also request that HUD amend “LGBTQ+” to “LGBTQI+” to be consistent with Executive Order 14075 (“Advancing Equity for Lesbian, Gay, Bisexual, Transgender, Queer and Intersex Individuals”).

Additional comments:

We support the Compliance Procedures in §5.170. For people with disabilities, the opportunity to submit a complaint due to a program participant’s failure to comply with the AFFH Rule or its Equity Plan, as well as actions that are materially inconsistent with advancing fair housing, is important in light of the prevalence of disability discrimination. [According to annual reports published by HUD’s Office of Fair Housing and Equal Opportunity \(FHEO\) during the 11-year period from 2009 to 2019, the total number of housing discrimination complaints had decreased 24.5 percent from 10,242 to 7,729, while the number of housing discrimination complaints based on a failure to provide a reasonable accommodation had increased by 46.1 percent from 2,430 to 3,550.](#) Disabled renters have also testified to retaliatory behaviors, including eviction, when informing landlords and public housing agencies of the obligation to alter policies and rules in a reasonable way so that a tenant with a disability can stay in their housing or begin a tenancy. We encourage an explicit recognition of reasonable accommodation issues to be incorporated, as the failure to make reasonable accommodations is materially at odds with affirmatively furthering fair housing opportunities for people with disabilities. We urge HUD to adopt a “no-wrong-door” approach to complaints so that all complaints are investigated appropriately. For example, complaints about a PHA’s failure to grant reasonable accommodations may not only indicate actions that are inconsistent with AFFH obligations, but also violations of other sections of the Fair Housing Act. HUD should ensure these complaints are investigated under appropriate procedures because enforcement mechanisms and remedies for AFFH complaints differ from that for other fair housing complaints filed under Section 810.

We also request that HUD provide specific training for disabled members of the public on the complaint process. This can be accomplished by working with agencies such as Protection and Advocacy Agencies in each state and Centers for Independent Living.

In closing, thank you for the opportunity to comment on the proposed Affirmatively Furthering Fair Housing proposed rule.

Sincerely,
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