



Thank you for the opportunity to provide public comment regarding the Manufactured Housing Consensus Committee's (MHCC) evaluation of log items #2 and #3 that would increase the minimum width of exterior doors and interior hallways of HUD-code homes.

I am Heather Ansley, Director of Veterans Policy for VetsFirst, a program of United Spinal Association. United Spinal Association has been an advocate for barrier free design since 1946. For over 60 years, United Spinal has consulted with numerous commercial, residential, and recreational developers to ensure access for people with disabilities, including disabled veterans.

Today, I am here representing the Consortium for Citizens with Disabilities (CCD) Housing Task Force. CCD is a coalition of over 100 national consumer, service provider, and professional organizations which advocates on behalf of people with disabilities and chronic conditions and their families. The CCD Housing Task Force is a coalition of national organizations which advocates on behalf of the housing needs of people with a variety of disabilities, including developmental disabilities, mental illness, sensory disabilities, physical disabilities, and intellectual disabilities.

Manufactured homes, are homes, and must be built to ensure that people with disabilities are able to fully access all living areas. Manufactured homes provide a source of affordable housing for people with disabilities, including returning veterans who have acquired disabilities due to their service. Unless these homes are built to provide access for wheelchairs and other mobility devices, people with disabilities will have fewer housing options. For people unable to afford other housing, inaccessibility may severely limit usability and create unacceptable safety concerns.

In addition, manufactured homes must be accessible to meet the needs of an aging population. Most people want to remain in their homes as they age. Seniors should not be forced to move to costly nursing homes because they are no longer able to navigate their existing homes due to design standards that do not accommodate needed mobility devices.

MHCC is considering two changes to the Manufactured Housing Standards impacting the accessibility of homes built under the code:

- 1) Requiring one 32-inch clear opening entry door in each home built under the federal manufactured housing code.
- 2) Requiring interior hallways in homes wider than 14 feet to have a minimum width of 30 inches.

The CCD Housing Task Force would like to offer our qualified support of these proposals. Specifically, the task force supports the recommendation for one 32-inch clear opening entry door. This width is the minimum required for wheelchair access in buildings and facilities, and is the current accepted practice in residential construction and visitability requirements where adopted.

The proposal for a 30-inch minimum width hallway, however, is significantly short of the minimum width required for wheelchair access reflected in the Americans with Disabilities Act (ADA) Accessibility Guidelines. The federal design standard requires that the minimum clear passage width for a single wheelchair be 36 inches. Maneuverability from doors off of the hallway is a prime reason for these design standards. If a person with a disability needs to turn 90 degrees to enter a room, 36 inches is difficult, but 30 inches is nearly impossible.

Consequently, the task force believes that MHCC should put forward a recommendation for no less than the minimum access standard of a 36-inch width hallway.

Recommending standards consistent with most federal and state building codes for manufactured homes is critical. The main purpose of building codes is to protect public health and safety. Limiting the safety of people with disabilities by failing to provide the needed passage width for mobility devices is not acceptable.

Manufactured homes fulfill an important role in housing opportunity for people with disabilities, including disabled veterans. Consequently, standards for manufactured homes must be similar to other building codes to ensure full access. Short of that, however, the task force does support efforts that would improve the current accessibility standards.

The CCD Housing Task Force appreciates the opportunity to comment regarding the proposed accessibility standards for manufactured homes. We encourage MHCC to adopt standards that will ensure maximum visitability, safety, and livability for individuals who require an accessible built environment.