



**CONSORTIUM FOR CITIZENS
WITH DISABILITIES**

January 28, 2022

The Honorable Marcia Fudge
Secretary
U.S. Department of Housing and Urban Development
451 7th Street S.W.
Washington, D.C. 20410

Re: Draft FY22-26 Strategic Plan Focus Areas

Dear Secretary Fudge,

Thank you for the opportunity to comment on HUD's Draft FY22-26 Strategic Plan Focus Areas. The co-chairs of the Consortium for Citizens with Disabilities (CCD) Housing Task Force submits these comments on behalf of the task force . CCD is the largest coalition of national organizations working together to advocate for national public policy that ensures the self-determination, independence, empowerment, integration and inclusion of children and adults with disabilities in all aspects of society, free from racism, ableism, sexism, and xenophobia, as well as LGBTQ+ based discrimination and religious intolerance; that enhances the civil rights and quality of life of all people with disabilities and their families; and that reflects the values of the Americans with Disabilities Act and all civil rights law.

The Task Force has identified three priority areas for our work over the coming year. The chart below lists these priority areas, whether they appear to be addressed in the draft focus areas, and where they are not, Housing Task Force recommendation:

CCD Housing Task Force Priority Area	Is Priority Addressed in HUD Strategic Plan Focus Areas?	If not addressed, Task Force Recommendation
Ensure people with disabilities living in institutions and congregate settings are safe during the continued COVID19 pandemic, other pandemics, public health emergencies, and impacts of the climate crisis and environmental racism, by	No	The draft does not acknowledge the need to provide affordable and/or accessible housing opportunities to decrease the number of persons with disabilities living in institutions, nursing facilities and congregate settings. These individuals, many of whom would choose to live in the

increasing opportunities to move into to affordable, accessible housing in their community of choice.		community if affordable and accessible housing were available, were disproportionately impacted by COVID ¹ . This must be a priority as part of HUD's Support for Underserved Communities.
Increase integrated, equitable, safe, affordable, and accessible housing opportunities for people with disabilities, through housing production, preservation, and protection, via increasing funding and strategic implementation of programs such as Housing Choice Voucher program, including the Mainstream program, and the Section 811 PRA program.	No	HUD's production goals must specifically provide for the development of accessible housing and to ensure that people with disabilities have the opportunity to live in integrated settings with access to community-based supports on a voluntary basis. This must be a priority as part of HUD's focus area to Ensure Access to and Increase the Production of Affordable Housing.
Help enhance fair housing laws, regulations, guidance and practices for people with disabilities and other protected classes within HUD, DOJ, HHS, the White house and other key federal agencies.	Yes	

We hope HUD will acknowledge the needs of people with disabilities who are extremely low-income but are not homeless by incorporating these recommendations.

Thank you for the opportunity to comment on the Strategic Plan Focus Areas.

Sincerely,

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 Consortium on Citizens with Disabilities
 Housing Task Force

¹ See for example <https://www.kff.org/coronavirus-covid-19/issue-brief/nursing-homes-experienced-steeper-increase-in-covid-19-cases-and-deaths-in-august-2021-than-the-rest-of-the-country/#:~:text=COVID%2D19%20cases%20aIso%20increased,growing%20from%205%2C700%20to%2029%2C600>).

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