



**CONSORTIUM FOR CITIZENS
WITH DISABILITIES**

December 5, 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: 60-Day Notice of Proposed Information Collection: Energy Benchmarking FR-5913-N-27

To Whom It May Concern:

Thank you for the opportunity to comment on the “60-Day Notice of Proposed Information Collection: Energy Benchmarking” Vol. 81, Federal Register No. 192, FR-5913-N-27” (October 4, 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.

The PRA program is a project-based rental assistance program through which state housing agencies fund properties to create integrated affordable housing for people with disabilities. While the CCD Housing Task Force (HTF) is fully supportive of the Administration’s energy savings goals, for a variety of reasons, the CCD HTF believes for it is inappropriate to include the Section 811 Project-Based Rental Assistance (PRA) program in this data collection process.

First, in order to ensure integration, the statute that created the program limits the percentage of PRA units in any property to a maximum of 25% of the total units in that property; some states are using only 10%-15% of the units in any property. At this time – the program is still being implemented – the average number of units per property is 7.5 units. As stated in the proposed Notice, “It is important to understand, however, that metrics calculated with less than whole building data are not accepted by EPA for the purposes of Energy Star certification.” It is not within the purview of this more limited program to secure data for non-PRA units in the property.

Second, footnote 11 (referencing footnote 10) states: “Under HUD’s regulations for the Section 202

and Section 811 programs at 24 CFR 891.400(d)(2) Owners are required to submit statements regarding project operation, financial conditions and occupancy as HUD may require to administer the PRAC and to monitor project operations.” 24 CFR 891 applies to Section 811 PRAC/Capital Advance properties but does not apply to the PRA program.

Thank you for the opportunity to comment on the “60-Day Notice of Proposed Information Collection: Energy Benchmarking” Vol. 81, Federal Register No. 192, FR-5913-N-27” (October 4, 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