



Submitted via regulations.gov

June 1, 2026

Regulations Division
Office of General Counsel
U.S. Department of Housing and Urban Development
2415 Eisenhower Avenue
Alexandria, Virginia 22314

RE: FR-6144-P-09; HOME Investment Partnerships Program: Further Program Updates and Streamlining

Thank you for the opportunity to comment on the “HOME Investment Partnerships Program: Further Program Updates and Streamlining” (FR-6144-P-09). 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.

The CCD Housing Task Force is strongly opposed to the removal of the tenant protections in the proposed HOME Rule (92.253). The protections provided to tenants in HUD-assisted housing far outweighs the limited impact on owners and purported confusion for tenants. We note that requiring owners to ensure properties are maintained appropriately (92.253(b)(1)), provide written notice prior to entering a unit (92.253(b)(2)) and ensuring security deposits are refundable and be no more than 2 month’s rent (92.253(b)(9)) are reasonable and not burdensome to owners. **In particular, the CCD Housing Task Force urges HUD not to remove the requirement at 92.253(b)(2) that includes the right for a tenant to reside with a live-in aide.** Live-in aides are necessary for many older adults and people with disabilities to live independently in the community. Removal of this provision is especially concerning given how lax HUD has been in enforcing the right to reasonable accommodations in its programs¹, the only other path a person with a disability or older adult can take to secure live-in aides. Recent HUD actions, such as with the withdrawal of fair housing guidance documents, have further undermined fair housing enforcement.²

¹ <https://www.gao.gov/products/gao-23-105083>; <https://www.hudoig.gov/sites/default/files/2022-02/2022-BO-0001.pdf>

² <https://www.federalregister.gov/documents/2026/04/06/2026-06624/notification-of-withdrawal-of-fair-housing-and-equal-opportunity-guidance-documents>

The Task Force's primary mission is to ensure people with disabilities have the opportunity to live in integrated, accessible, affordable housing in their chosen community. Therefore, the Task Force strongly opposes the proposed revisions to 92.253(d)(3). Specifically, we object to HUD's proposal to "delete the first sentence of this provision to permit owners to limit or provide a preference to persons with disabilities even if the services can be provided in a non-segregated setting."³ The removal of the first sentence strips away a fundamental safeguard for community integration. The current requirement—that a preference only be permitted if services *cannot* be provided in a non-segregated setting—is vital because the vast majority of necessary supports and services, including case management, personal care attendant (PCA) services and other in-home supports, can and should be provided in integrated environments. Deleting this sentence creates a veiled path for the development of segregated, disability-specific housing by allowing owners to justify specialized settings for services that are easily accessible in integrated community settings. This change risks a scenario where the 'choice' of segregated housing is effectively made for people with disabilities, rather than ensuring they have the opportunity to choose integrated, community-based options. Moreover, through federal policy mandates, HUD is obligated to ensure people with disabilities have the opportunity to live in truly integrated, accessible, and affordable housing. The HOME program has historically been used to successfully create these integrated housing options, and the Task Force is strongly opposed to any changes that interfere with this goal.

Thank you for the opportunity to comment.

Sincerely,

Allie Cannington, The Kelsey
Co-Chair, CCD Housing Task Force
allie@thekelsey.org

Jennifer Kye, Justice in Aging
Co-Chair, CCD Housing Task Force
jkye@justiceinaging.org

Greg Robinson, Autistic Self Advocacy Network Co-
Chair, CCD Housing Task Force
grobinson@autisticadvocacy.org

³ Page 23200, Federal Register Vol. 91, No. 83.