



CCD 2025 Rights Task Force Annual Report

1. Brief Task Force Description or Mission Statement:

The Rights Task Force advocates on a wide variety of matters involving the civil and human rights of people with disabilities through an equity lens. The Task Force's vision is driven by a commitment to diversity, equity, inclusion, and social justice, as well as the four key goals for people with disabilities set forth in the Americans with Disabilities Act (ADA): equality of opportunity, full participation, independent living, and economic self-sufficiency. Through our work, we are committed to protecting and advancing the rights of people with disabilities and ensuring that the ADA, the Rehabilitation Act, the Fair Housing Amendments Act, and other rights are interpreted and enforced in a robust manner to secure the equal rights and opportunities of people with disabilities including those who are Black, Brown, Indigenous, and LGBTQ+. The Task Force is committed to advocating for the civil and human rights of people with disabilities with multiple statuses or who are multiply marginalized.

2. Three Issues the Task Force Worked on in 2025

- a. We opposed the Department of Labor's proposed rule to eliminate key portions of the regulations implementing Section 503 of the Rehabilitation Act (requiring large federal contractors to take affirmative steps to employ and advance people with disabilities) including: (a) the 7% utilization goal, (b) the annual analysis related to that goal, (c) the requirement that contractors provide job applicants and employees an opportunity to voluntarily self-identify as having a disability, and (d) the required data collection and analysis to determine how people with disabilities are faring in the hiring process. We took the lead in drafting regulatory comments for the Rights and Employment and Training Task Forces.
- b. We opposed the Department of Energy's "direct final rules" under Section 504 eliminating the accessibility standards for new construction as well as the transition plan requirement for existing facilities for Department of Energy grantees. We highlighted the completely improper use of the "direct final rule" mechanism, which is designed for non-controversial and minor technical changes rather than for major substantive changes, as well as the DFRs' inconsistency with Congressional intent. We also coordinated with civil rights groups concerned about related Department of Energy DFRs to send further communications to the Department.



- c. We took the lead in drafting comments for the Rights, Health, and LTSS Task Forces opposing the Department of Homeland Security's proposed rule to eliminate entirely the current public charge rule and allow immigration officials to consider any type of benefit in determining whether someone is a "public charge."
3. Three Issues the Task Force Anticipates Working on in 2026
 - a. We anticipate working to protect the rights of people with disabilities as states prepare to implement Medicaid changes enacted by Congress in the so-called One Big Beautiful Bill Act, including work requirements. In light of the significant impacts that the changes will have on people with disabilities, we anticipate that it will be necessary to assert their rights as the federal government and states move forward with implementation.
 - b. We will continue to push back against regulatory assaults on the rights of people with disabilities. This past year saw numerous regulatory proposals that would harm people with disabilities and we anticipate the need to fight additional such proposals in the coming year.
 - c. We will fight ADA notification bills that aim to undermine the protections of Title III of the ADA by requiring notice and a lengthy cure period. Our task force has successfully fought a number of similar bills in past years, and a new notification bill has just been introduced in Congress. This issue is particularly important because the lack of money damages under Title III means that a notice-and-cure requirement would take away any incentive for businesses to comply with the ADA unless and until they receive a requisite notice.
4. 2025 Task Force Co-Chairs:
 - a. Jennifer Mathis, Bazelon Center for Mental Health Law, jenniferm@bazelon.org
 - b. Claudia Center, Disability Rights Education and Defense Fund, ccenter@dredf.org
 - c. Allison Nichol, Epilepsy Foundation, anichol@efa.org
 - d. Morgan Whitlatch, Center for Public Representation, mwhitlatch@cpr-ma.org
 - e. Stephen Lieberman, United Spinal Association, slieberman@unitedspinal.org
5. Task Force Meeting Day of the Month and Meeting Time: Third Thursday, 1:30-3pm ET



6. Task Force Co-Chair Contact for Accommodations Coordination [e.g. ASL or CART]:
Jennifer Mathis, jenniferm@bazelon.org