



Commemorating 40 Years  
Of Disability Advocacy  
1973-2013

April 2, 2013

Mr. Shawn Bucholtz  
Director, Housing and Demographic Analysis Division  
Office of Policy Development and Research  
US Department of Housing and Urban Development  
451 7th St. SW, Room 8222  
Washington, DC 20410

RE: Request for Comment on the Redesign of the American Housing Survey [Docket No. FR-5695-N-01]

Dear Mr. Bucholtz:

On behalf of the Consortium for Citizens with Disabilities (CCD) Housing Task Force, we submit the following comments on the notice issued on February 1, 2013, regarding the intent of the Department of Housing and Urban Development (HUD) to redesign the American Housing Survey (AHS) for 2015 and later years.

CCD is a working coalition of national consumer, advocacy, provider, and professional organizations working together with and on behalf of the 57 million children and adults with disabilities and their families living in the United States. The CCD Housing Task Force 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. The CCD Housing Task Force works to increase access to decent, safe and affordable housing for all people with disabilities and to protect rights guaranteed to people with disabilities under the Fair Housing Act and other civil rights laws.

The CCD Housing Task Force's comments will focus on AHS content and question redesign issues. Specifically, we would like to provide responses to four of the six questions posed in the notice regarding AHS content and questions.

1. Should HUD continue the strategy of core and rotating topical modules?

With regard to disability, we believe that HUD should continue the strategy of core and rotating topical modules. The current core questions include six questions regarding disability status. We believe that disability status questions should be asked each time the survey is given because disability is a very dynamic status. A disability can occur, increase, or decrease over a short period of time. The questions about accessibility, however, are appropriate rotating questions because accessibility features may be more static.

2. What content should be included in the core modules, considering that housing characteristics change slowly?

We believe that the six disability status questions should remain part of the core modules. Unlike housing characteristics, disability status may be dynamic. An individual may lose or regain function or acquire a disability at any time.

### 3. What topics should HUD consider for rotating topical modules from 2015-2019?

We believe that housing accessibility questions should continue to be part of the rotating modules. Although a key aspect of the survey, accessibility features may evolve more slowly than the need for those features.

### 4. What questions should HUD consider reformatting to elicit more accurate responses?

To evaluate the housing accessibility questions, we reviewed a document containing the questions used in the 2011 survey and offer the following observations.

It appears that many of the questions require a level of knowledge that many respondents lack and may elicit data that does not give an accurate picture of the housing stock surveyed. For example, there are several questions about the presence of raised toilets, "extra wide doors or hallways," "wheelchair accessible" electrical outlets and switches and climate controls, and the positioning of kitchen cabinets. Unless the individual being queried is familiar with the requirements of the Fair Housing Accessibility Guidelines [for private multifamily housing] or the Uniform Federal Accessibility Standards for federally-financed housing, the person may answer based on a "best guess" or personal perception. If future modules contain questions about accessibility features, they should include the appropriate standard in those questions so that the respondent could measure the feature and provide a more accurate answer.

Some questions seem poorly worded or fail to ask about critically important accessibility features. For example, one question asks if respondents have ramps inside their homes. Few homes, however, have ramps inside them. The more important question would be to ask if there is a ramp to the entrance of the home." If the question concerning ramps inside the home is retained, it might be better to position that question near a subsequent question asking if all the areas in the home are "on the same level, meaning no steps between rooms." In addition, asking if there are bedrooms or bathrooms on an entry level will be unhelpful if there are steps into those rooms as can be found in many homes around the country. It would be more appropriate to ask "is there a bathroom and bedroom on the entry level with a no-step entrance." Another question asks about grab bars or handrails in any bathroom shower or bathtub areas but does not ask if there are grab bars or hand rails near the toilet.

Other questions seem to seek more information about the residents themselves rather than the housing units being reviewed. Several questions ask whether anyone in the household uses the ramps, elevator, or entry level bedroom or bathroom. Whether someone in the household uses the accessibility features is not the sole criterion on which to judge the value of those features. Visitors might take advantage of the accessibility features and, therefore, the fact of the presence of those features is still important.

We appreciate the opportunity to comment. If you have any questions, please contact Susan Prokop, CCD Housing Task Force member, at (202) 416-7707 or by e-mail at [susanp@pva.org](mailto:susanp@pva.org) or Heather Ansley, CCD Housing Task Force member, at (202) 556-2076, Ext. 7702 or by e-mail at [hansley@vetsfirst.org](mailto:hansley@vetsfirst.org).

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