



March 10, 2021

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

Dear Secretary Fudge:

Congratulations on your confirmation as the Secretary for the U.S. Department of Housing and Urban Development. We are eager to work with you and your team to achieve our many shared goals. To that end, we request a meeting with you at your earliest convenience.

LeadingAge represents more than 5,000 nonprofit aging services providers, including HUD-subsidized senior housing communities, and other mission-minded organizations that touch millions of lives every day. Alongside our members and 38 state partners, we use applied research, advocacy, education, and community-building to make America a better place to grow old. Our membership encompasses the entire continuum of aging, including affordable senior housing providers. We bring together the most inventive minds to lead and innovate solutions that support older adults wherever they call home.

More than 1.9 million older adults rely on HUD's programs for affordable, accessible, and quality housing. Meanwhile, millions of older adults are eligible for housing help but cannot access it because the programs are too small. Today, 30% (2.6 million) of older adult renter households spend more than half of their incomes on housing, leaving little for other life necessities.

We look forward to working with you to advocate for and carry out the robust housing platform elucidated by President Joe Biden during his presidential campaign. This housing platform reflects solutions to older adults' need for affordable, accessible, and quality housing.

LeadingAge looks forward to working in partnership with you toward our shared goals. Please reach out to LeadingAge vice president for housing policy, Linda Couch, lcouch@leadingage.org, to follow up on our request for a meeting and with any questions.

Sincerely,

A handwritten signature in black ink that reads "Katie Smith Sloan". The signature is written in a cursive, flowing style.

Katie Smith Sloan
President and CEO



LeadingAge calls out several elements of the President's campaign platform that will be critical to meeting the affordable housing needs of older adults with low incomes:

New Affordable Housing as an Infrastructure Investment

An adequate supply of homes affordable to all households, including older adult households, is critical to meeting each of our goals.

LeadingAge supports:

- As an infrastructure investment for economic recovery, LeadingAge supports a \$2.5 billion investment in 2021 for the Section 202 Housing for the Elderly program.
- And, for fiscal year 2022 appropriations, LeadingAge supports \$600 million for new Section 202 Housing for the Elderly homes.

Older adults and the myriad of people who older adults rely on for their health and well-being need affordable housing. We agree with President Biden, as he made clear on the campaign trail, that every American in every zip code should have access to housing that is affordable, stable, safe and healthy, accessible, energy efficient and resilient, and located near good schools (and services, LeadingAge would add) and with a reasonable commute to their jobs (and to the food, health care, and social services they need, LeadingAge would add).

The Section 202 Housing for the Elderly program, the nation's flagship affordable program for older adults, had no new funding for new Section 202 homes between fiscal year 2012 and fiscal year 2017. "A Biden Administration will increase the availability of supportive and accessible housing for seniors and individuals with disabilities, including through the Supportive Housing for the Elderly ("Section 202") program, the President's platform says. LeadingAge agrees with the Biden Administration: increased investment in new housing through the Section 202 program is necessary.

New projections from the Urban Institute, in *The Future of Headship and Homeownership* ([here](#)), predict 16.1 million new U.S. households from 2020 to 2040. Of these, Urban projects that 13.8 million will be older adult (62+) households. Of these, an astounding 5.5 million (40%) will be older adult renter households. Of the 5.5 million new older adult renter households, 2.6 million will be Black older adult renter households, a doubling of today's 1.3 million Black older adult renter households. The overall share of older adult households who are renters, Urban predicts, will increase from 22% in 2020 to 27% in 2040.

According to HUD's 2020 *Worst Case Housing Needs report to Congress* in, there are 1.93 million very low income renter households paying more than half of their incomes for housing and/or living in severely substandard housing who are shut out of housing help because the programs are too small to meet the existing and growing need. "The national trend of declining worst case needs was not experienced across all household types in 2017. The number of elderly households experiencing severe housing problems has steadily increased over the past decade. During 2017, 1.93 million elderly renters had worst case needs," HUD's 2020 report says ([here](#)).

In addition to older adult renters, more than three million older adult homeowners are also severely housing cost burdened, spending more than half of their incomes for housing costs.

LeadingAge supports President Biden's pledge to invest \$640 billion over ten years in programs like the Section 202 program, an Affordable Housing Fund, vouchers for all eligible households (which, to reap the benefits to older adults of place-based services, can be project-based), and expansion of the low income housing tax credit program, among others, and for a comprehensive approach to ending homelessness and housing instability.

Preserve and Improve the Affordable Housing Supply

Preserving existing affordable housing must also be achieved.

Sufficient and timely annual renewal funding is critical to preserve existing affordable housing.

Housing preservation achieved by programs HUD's Rental Assistance Demonstration also offers opportunities to improve subsidized housing's fully accessible units and building-wide features, such as internet connectivity for all apartments and common spaces, and a financial commitment to Service Coordinators. Using preservation as an opportunity to achieve other goals, such as linkages to health and wellness coordination and internet connectivity is important to LeadingAge.

Improving housing quality, as noted during President-elect Biden's campaign, is also important. Depending on the source of information, somewhere between 1% and 4% of the nation's housing stock is physically ready to meet the needs of people with accessibility needs. Features such as grab-bars or handrails in the bathroom, extra-wide hallways and doors, and a bedroom on the entry level, and a range of features needed for fully-accessible homes where a resident uses a wheelchair.

Within HUD's own portfolio of subsidized housing, a 2020 report from the Joint Center for Housing Studies of Harvard University, *Accessibility Features for Older Households in Subsidized Housing*, found that subsidized older adult renters have significantly more mobility difficulties than eligible-but-unsubsidized older adult renters ([here](#)).

As the pandemic has shown us once again, housing and health are intricately linked. The nation's supply of housing affordable to people with low incomes is precious and should be treated as such. We look forward to supporting your work to secure the resources and policies necessary to smartly preserve all HUD-subsidized affordable homes.

Beat COVID-19

COVID-19 has ravaged HUD-subsidized senior housing. More than 1.1 million older adults aged 62+, for whom COVID-19 is most deadly, live in HUD-subsidized Section 202, Section 8 Project-Based Rental Assistance, and Public Housing communities. HUD-assisted senior housing communities continue to face financial hardship and need urgent support.

Financially Support Infectious Disease Control: Significantly more COVID-19 relief is needed to combat the spread of COVID-19 in HUD-subsidized senior housing communities and to ensure older adults are not further ravaged by the collateral impacts of the virus. Funding for PPE, cleaning and disinfecting, increased staffing costs, technology support, and food and other services, remain high need areas.

Vaccinate Affordable Senior Housing Communities: With COVID-19 vaccine distributions underway, all types of HUD-subsidized senior communities, not just HUD's flagship Section 202 Housing for the Elderly communities, should be targeted for on-site COVID-19 vaccination clinics, should be proactively paired up with federally

qualified health centers or other vaccine administration entities, and should be seen as a key path toward beating COVID-19. The ending of the CDC's Pharmacy Partnership for Long-Term Care Program, which resulted in onsite vaccine clinics at fewer than half of Section 202 communities, has not been replaced with any other initiative to get onsite vaccine clinics to all kinds of HUD-assisted senior housing and too many older, mobility restricted residents are scrambling to access vaccines.

LeadingAge urges HUD to use the regulatory flexibility provided during the public health emergency to keep resident and staff health at the forefront of decision making, and to ensure relief funds are allocated as quickly and responsively as possible to HUD-subsidized providers.

Improve Racial Economic Equity

We agree with President Biden that racial disparities in housing affordability for older adults are fueled by racial income and wealth disparities. The damaging Black / white homeownership divide results in significant wealth inequities for older adults. "In 2016, the median owner age 65 and over had home equity of \$143,500 and net wealth of \$319,200. By comparison, the net wealth of the same-age renter was just \$6700," according to the Joint Center for Housing Studies of Harvard University ([here](#)). Compounding the divide is the fact that Black and Brown homeowners are much more likely to carry any housing debt into retirement than their white peers.

LeadingAge supports reinstating the Affirmatively Furthering Fair Housing rule, rigorous enforcement of the Fair Housing Act and the Home Mortgage Disclosure Act, reinstatement of the federal risk-sharing program, the elimination of local and state housing regulations that perpetuate discrimination, such as exclusionary zoning, and the creation of policies that support equity, such as source of income laws.

Advance LGBTQ+ Equality, Including for LGBTQ+ Older Adults

LeadingAge supports Biden Administration proposals to rescind proposals that would allow federally-funded homeless shelters to turn away transgender people. We applaud HUD's recent expansion of Fair Housing Act protections to include sexual orientation and gender identity. We also support passage of the Equality Act, to ensure that no President can ever again single-handedly roll back civil rights protections for LGBTQ+ individuals, including in housing and homeless shelters.

LeadingAge believes in the Biden Administration's mantra that all federal agencies should be champions for equality and looks forward to working with you to carry out this goal at HUD.

Long-Term Services and Supports in Local Settings

LeadingAge believes HUD has a critical role in the success of President Biden's campaign goal of increased access to home- and community-based services for older adults and people with disabilities.

President Biden's campaign pledge to expand access to a broad array of long-term services and supports in local settings cannot be brought to reality without: 1) expanding the supply of affordable housing, and 2) Service Coordinators to connect residents to the services and supports they need to age in community and to have, as President-elect Biden called for, a "dignified retirement."

Expand Service Coordination: The nation cannot fulfill the directives of the 1999 Olmstead decision to provide community-based services if there is no affordable place in the community for people to live. Building on an affordable, accessible, and quality place to call home are Service Coordinators, which exist in too few HUD-subsidized senior housing communities. Service Coordinators are the crucial link between residents and the services and supports needed to remain in independent living communities like Section 202, Public Housing, and Section 8 Project-Based Rental Assistance communities.

LeadingAge is eager to see the results of HUD's work, with Centers for Medicare and Medicaid Services, as directed by the fiscal year 2020 HUD appropriations bill, on how Medicare and Medicaid funds can be used to support programs that use affordable senior housing as a platform for coordinating health, wellness, and supportive services and programs to help older adults remain healthy, age in their community, and reduce their use of costly health care services.

The results of this HUD / CMS collaboration may dovetail with the findings of HUD's Integrated Wellness in Supportive Housing demonstration. The demonstration, underway at 40 Section 202 communities, was just extended by Congress in the fiscal year 2021 HUD appropriations bill. The linkages to of this demonstration to the HUD/CMS collaboration, to the nation's ability to comply with the Olmstead decision, and to increases in federal funding to assist older adults who could be very well served within affordable housing instead of much expensive settings could all converge in the very near future.

Broadband to Every Household

LeadingAge also looks forward to working with you to ensure that every HUD-assisted household, including every older adult household, has access to affordable broadband.

No part of American life can be as fully and efficiently realized as it can be with broadband internet access. For older adults in HUD-assisted housing, the majority of whom cannot afford and / or do not have internet in their apartments, affordable broadband would mean access to services and supports, joining the telehealth revolution, ordering groceries, connecting with family and friends, and, even more basically, having the ability to be a full member of today's internet-based society.