



December 18, 2023

Dina Lehmann-Kim
Program Manager, Public and Indian Housing
Department of Housing and Urban Development
451 7th Street SW, Room 4130
Washington, DC 20024

Re: Notice of Expansion and Proposed Restructuring of the Digital Opportunity Demonstration Program

Dear Ms. Lehmann-Kim,

Thank you for the opportunity to provide comments on the next phase of ConnectHomeUSA. LeadingAge deeply values the efforts HUD has made to improve internet access in affordable senior housing, including by expanding the ConnectHomeUSA (CHUSA) program to intentionally include properties participating in HUD’s Multifamily Housing programs.

About LeadingAge

LeadingAge represents more than 5,000 aging services providers, including non-profit owners and managers of federally-subsidized senior housing properties. 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 continuum of services for people as they age, including those with disabilities. We bring together the most inventive minds in the field to lead and innovate solutions that support older adults wherever they call home.

The Importance of Internet Access for HUD-Assisted Older Adults

The importance of internet connection for HUD-assisted older adults cannot be overstated. In a 2021 letter to Ethan Handelman, HUD’s deputy assistant secretary for multifamily housing programs, LeadingAge wrote: “Connectivity is a not only a critical determinant of health—during COVID-19 and beyond—but also a key equity issue in our country. The pandemic has made clear that older adults with low incomes need access to the internet in their homes.”

LeadingAge’s letter went on to say that “housing communities also need wall-to-wall internet capacity for efficient housing operations, like uploading work orders during unit inspections or implementing HUD’s new guidance on electronic signatures and file storage. HUD should make every effort to expand internet capacity across the portfolio for the benefit of both projects and residents.”

Among other internet-related recommendations, LeadingAge’s letter called on HUD to revive and expand the ConnectHome program to serve Multifamily Housing. We applaud HUD for taking action to support the connectivity needs of older adults.

CHUSA Expansion: Big Step in the Right Direction

On October 17, HUD published a Notice seeking to further expand CHUSA and restructure its program model, with a goal of adding another 50 to 100 new communities – including properties participating in HUD’s Multifamily Housing programs. The program restructuring would adopt a three-tiered model and take place over three years.

Expanding CHUSA is a key step in the right direction. The expansion accompanies other recent progress the agency has made to support internet access, including clarifying Rent Comparability Study rules to value the availability of internet access and the recent data-sharing agreement with the Federal Communications Commission (FCC) to streamline enrollment in the Affordable Connectivity Program (ACP).

We are particularly supportive of the dedication of the HUD staff, including in both the Office of Public and Indian Housing and the Office of Multifamily Housing, who continue to collaborate internally and externally to bridge the digital divide.

While we value this expansion, we urge HUD to consider the limitations of the CHUSA program and to continue investing in other spheres of internet connectivity, including by securing more funds through Congress to offset the costs of internet infrastructure and services costs. We also urge HUD to continue collaborations with other federal agencies to make more connectivity resources available to affordable senior housing providers.

Thank you for considering the below recommendations as you move forward with the CHUSA expansion.

1. **Dedicated Staff Time:** Committing a dedicated staff person, without additional funding provided, is a large barrier for Multifamily Housing providers. Many properties have few, if any, existing staff that could dedicate significant time to the program over the next three years in addition to their regular duties. For example, this would be a very heavy lift for a Service Coordinator to lead, as Service Coordinators in Multifamily Housing are often overburdened by the number of residents each individual RSC is serving. We strongly encourage HUD to continue working with Congress to secure funding to accompany the technical assistance provided through CHUSA.
2. **Clarity on Value Add:** While LeadingAge and our membership of affordable senior housing providers applaud the efforts to include MF in CHUSA, the added value for MF properties joining the program is not yet clear. For example, under the proposed tiered structure, properties and organization that have already engaged in initial steps to build connectivity at HUD-assisted properties may not be eligible to join, and further, they may not see additional value in joining the program (some of these organizations are already engaged with EducationSuperHighway). On the other hand, the expansion seems to target smaller organizations who have not started work in this area, and yet the requirements and commitments of the program may be overwhelming/intimidating for those types of properties. The Multifamily Housing community would benefit from more clarity on the specific technical assistance and other benefits of joining the program for various types of organizations.
3. **Clarity on Multifamily Housing “Community” Participation:** The description of the expanded CHUSA program also was not entirely clear on how Multifamily “communities” should engage with the program. For example, the Notice does not clarify how “communities” are defined, but has indicated that “community” extends beyond an individual property. However, in the context of HUD’s Multifamily Housing programs, an organization may have multiple properties, but they are likely geographically spread out and function not as a “community” with jurisdiction over other

neighborhood entities, but rather as an individual apartment building. The program would benefit from more clarity on how HUD envisions MF “community” participation in CHUSA – does HUD intend for individual properties to establish partnerships with other entities in the neighborhood? Or would HUD allow either geographically dispersed properties or single buildings to be considered a “community”?

4. **Broader Networking and Support:** Overall, the CHUSA expansion is a good step in the right direction, but may need adjustments in order to be beneficial for Multifamily Housing providers. In addition to formal participation in ConnectHome, LeadingAge feels that the broader field of Multifamily Housing properties would be well-served by access to the forthcoming HUD-sponsored summits and regional networking opportunities. Owners could learn from ConnectHomeUSA participants and technical assistance partners without having to commit to structures and goals that may not work for that specific organization. We encourage HUD to “open up” the key resources and supports to HUD-assisted Multifamily Housing providers, regardless of formal participation in CHUSA.

Again, thank you for the opportunity to comment on this important program. We look forward to continuing our work together.

Sincerely,

Juliana Bilowich
Director, Housing Operations and Policy
LeadingAge