

# HUD Rental Assistance: Serving Households with Disabilities

GAO-23-106339

A Report to Congressional Requesters

Accessible Version

March 29, 2023

## Why This Matters

Securing affordable, accessible housing can be a challenge for low-income households that have a member with a disability. The Department of Housing and Urban Development (HUD) serves many of these households through its rental assistance programs. Households with disabilities are entitled to certain legal protections related to accessible housing.<sup>1</sup> But not everyone who may qualify for HUD rental assistance receives it because the need for assistance exceeds available annual funding.

You asked us to examine HUD assistance for households with disabilities. This report provides information on how HUD serves low-income households (those with incomes at or below 80 percent of their areas' median income) with disabilities through its rental assistance programs.<sup>2</sup>

## Key Takeaways

- HUD assisted an estimated 1.8 million households with physical, mental, or other disabilities, according to the 2019 American Housing Survey (AHS), the most recent survey at the time of our review. HUD primarily served these households through the Housing Choice Voucher, public housing, and Project-Based Rental Assistance (PBRA) programs.<sup>3</sup>
- According to the 2019 AHS, most HUD-assisted households with a member using a mobility device (such as a wheelchair or walker) reported living in units with at least one accessibility feature (such as an entry-level bedroom and bathroom). However, more than 300,000 assisted households with a mobility device user reported living in units without any accessibility features.
- Providers of HUD-assisted housing are required to provide reasonable accommodations—such as structural modifications—to allow households with disabilities an equal opportunity to participate in HUD rental assistance programs. Housing providers also must use strategies, such as waitlist priorities, to match households with disabilities with units that meet their needs.

## Which HUD programs serve low-income households with disabilities?

HUD's three largest rental assistance programs—Housing Choice Vouchers, public housing, and Section 8 PBRA—serve millions of households with disabilities, but generally are not targeted to them (see table 1).<sup>4</sup> The primary eligibility requirement for these programs is income at or below applicable limits. In addition, several smaller programs are targeted to households with disabilities or senior households (which may have members with mobility impairments or other disabilities). These programs have eligibility requirements related to disability status or age, in addition to income.

**Table 1: Selected HUD Rental Assistance Programs That Can Serve Low-Income Households with Disabilities**

Rental assistance program	Program description
<b>Housing Choice Voucher program<sup>a</sup></b>	Provides subsidies for eligible low-income households to rent a unit in the private market.
<b>Special Purpose Vouchers</b>	Some “special purpose” vouchers (such as Non-elderly Disabled) are specifically targeted to households with disabilities.
<b>Public housing program<sup>a</sup></b>	Provides government-owned housing for eligible low-income households.
<b>Project-Based Rental Assistance</b>	HUD contracts with housing providers to make units in multifamily properties affordable to eligible low-income households. Designated units remain affordable to eligible households for the duration of the contract.
Section 8 Project-Based Rental Assistance	Provides project-based rental assistance contracts to housing providers to make units in privately owned multifamily properties affordable to eligible low-income households, among other activities. <sup>b</sup>
Section 811 Supportive Housing for Persons with Disabilities	Provides project-based rental assistance contracts to nonprofit organizations to help create affordable rental housing for eligible households with disabilities, among other activities.
Section 202 Supportive Housing for the Elderly	Provides project-based rental assistance contracts to nonprofit organizations to help create affordable rental housing for eligible households with one or more persons age 62 or older, among other activities.

Source: GAO analysis of laws, regulations, and Department of Housing and Urban Development (HUD) documentation. | GAO-23-106339

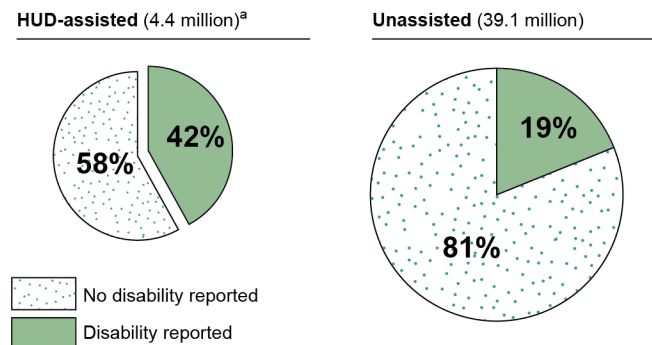
<sup>a</sup>State and local public housing agencies administer the Housing Choice Voucher and public housing programs.

<sup>b</sup>This program refers to certain project-based rental assistance provided under section 8 of the Housing Act of 1937 (codified as amended at 42 U.S.C. § 1437f), which HUD refers to as Project-Based Section 8. In some cases, properties may be owned by a government entity, such as a public housing agency.

## How many renter households does HUD assist?

In 2019, HUD assisted an estimated 4.4 million renter households. Of those, an estimated 42 percent (or about 1.8 million of 4.4 million households) reported having a disability, according to our analysis of AHS data.<sup>5</sup> By comparison, among the population of renter households not assisted by HUD, regardless of income, about 19 percent (7.5 million of 39.1 million) reported a disability (see fig. 1).<sup>6</sup>

**Figure 1: Proportion of Renter Households Assisted and Unassisted by the Department of Housing and Urban Development (HUD) That Reported a Disability, 2019**



Source: GAO analysis of 2019 American Housing Survey. | GAO-23-106339

Note: Estimates in this figure have a relative margin of error of plus or minus 1–4 percent of the estimate at the 95 percent confidence level.

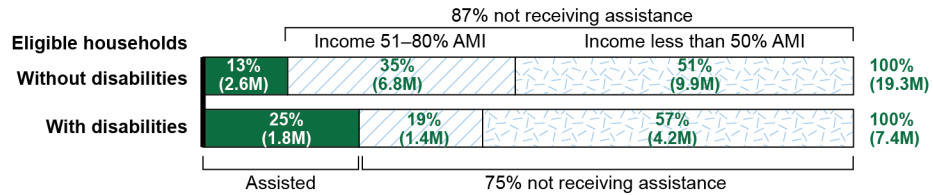
<sup>a</sup>Excludes households that did not report whether they had a member with a disability.

## What proportion of income-eligible households with disabilities receive HUD rental assistance?

According to our analysis of AHS data, in 2019 roughly 7.4 million renter households with disabilities were income-eligible for HUD assistance. Of those, about 25 percent (or about 1.8 million of 7.4 million) received HUD rental assistance. Most income-eligible households with disabilities did not receive HUD rental assistance.<sup>7</sup>

More than half of income-eligible households with disabilities were in the lowest income bracket reported in AHS (less than 50 percent of area median income) and did not receive assistance (see fig. 2). Income-eligible households with disabilities were slightly more likely to receive assistance than those without disabilities.

**Figure 2: Income-Eligible Households That Received and Did Not Receive HUD Rental Assistance, by Income and Disability Status, 2019**

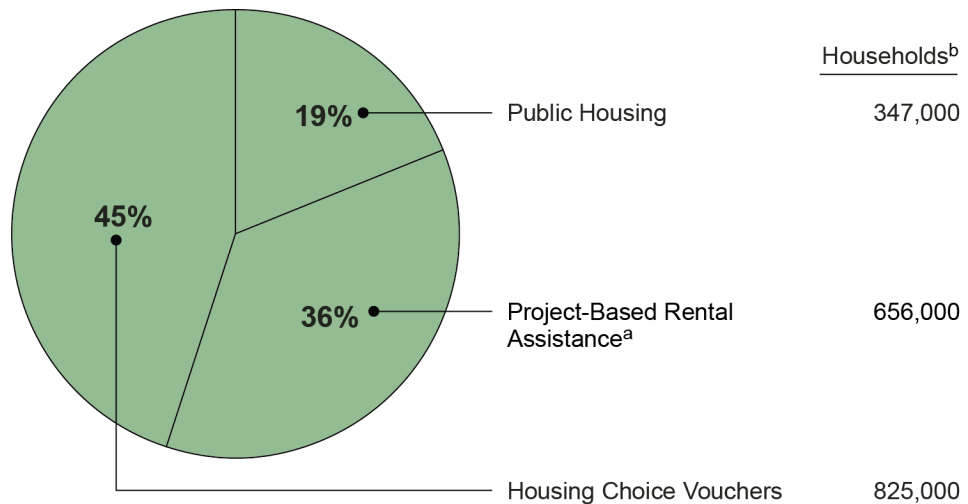


AMI = area median income  
 HUD = Department of Housing and Urban Development  
 M = million  
 Source: GAO analysis of 2019 American Housing Survey. | GAO-23-106339

Note: Estimates in this figure have a relative margin of error of plus or minus 1–9 percent of the estimate at the 95 percent confidence level. Portions of this figure may not add up to bracketed totals and total percentages in this figure do not equal 100 because of rounding.

Of the 1.8 million households with disabilities that received HUD rental assistance, an estimated 825,000 received Housing Choice Vouchers, 347,000 households lived in public housing, and 656,000 households received assistance under PBRA (see fig. 3).<sup>8</sup>

**Figure 3: Estimated Number and Percent of Assisted Households with Disabilities, by Type of Department of Housing and Urban Development (HUD) Rental Assistance, 2019**



Source: GAO analysis of 2019 American Housing Survey. | GAO-23-106339

Note: Estimates in this figure have a relative margin of error of plus or minus 6–11 percent of the estimate at the 95 percent confidence level.

<sup>a</sup>According to the American Housing Survey (AHS), this figure includes project-based subsidies provided under Project-Based Section 8, Section 202 Supportive Housing for the Elderly, Section 811 Supportive Housing for

Persons with Disabilities, Rent Supplement, Section 221(d)(3) Below Market Interest Rate, Section 236, Moderate Rehabilitation, and other smaller programs.

<sup>b</sup>According to HUD officials, the AHS estimates differ from internal HUD data on the number of households with disabilities served by each of these programs. HUD officials said this difference could be because HUD data collection uses a more limited definition of disability than the disability definition used in AHS or because of sampling or weighting methodologies used to match households with HUD assistance type.

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## What are strategies to help place HUD-assisted households with disabilities into accessible units?

Providers of HUD-assisted housing—such as public housing agencies that administer the public housing and Housing Choice Voucher programs and PBRA landlords—must use various strategies to help place households with disabilities into accessible units.<sup>9</sup>

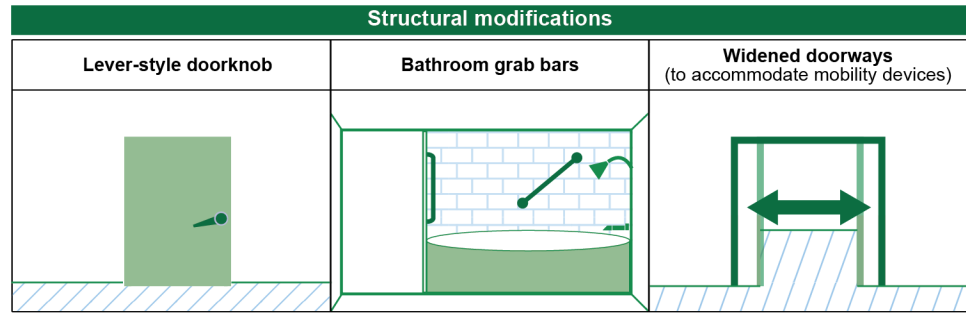
For example, public housing and PBRA providers must take reasonable steps to help ensure that accessible units in the projects they manage are occupied by households that require the features of the particular unit.<sup>10</sup> When an accessible unit becomes available, the provider must first offer it to a household already receiving assistance but residing in a unit that does not have the accessibility features they need. If there are no such households, the provider must then offer the unit to a qualified applicant on the waiting list that requires the accessibility features of the unit. To help place households with disabilities into accessible units, providers must establish waitlist policies and procedures related to application taking and record keeping. For example, public housing agencies may have separate waitlists for specific unit types, including accessible units. Separate waitlists for accessible units can help reduce the possibility that an accessible unit will be occupied by a household that does not require the accessibility features.

For the Housing Choice Voucher program where households rent units on the private market, the public housing agency must provide a current listing of available accessible units known to the agency and, if necessary, otherwise assist the household in locating an accessible unit.<sup>11</sup>

Public housing agencies and PBRA providers also must make **reasonable accommodations**—that is, changes to policies, practices, or structures—to allow households with disabilities an equal opportunity to participate in HUD rental assistance programs.<sup>12</sup> For example, agencies that administer Housing Choice Vouchers may extend the amount of time a new voucher recipient has to locate and rent a unit, or increase the monthly subsidy to help a tenant rent an accessible unit or larger unit to accommodate a live-in aide.<sup>13</sup>

Fully accessible units are limited in number.<sup>14</sup> To address this gap, households with disabilities that cannot find or do not live in accessible units (or in units with accessibility features) may request **structural modifications**. Structural modifications are physical changes to a building or unit to allow individuals with a disability to fully enjoy the premises (see fig. 4).

**Figure 4: Examples of Structural Modifications**



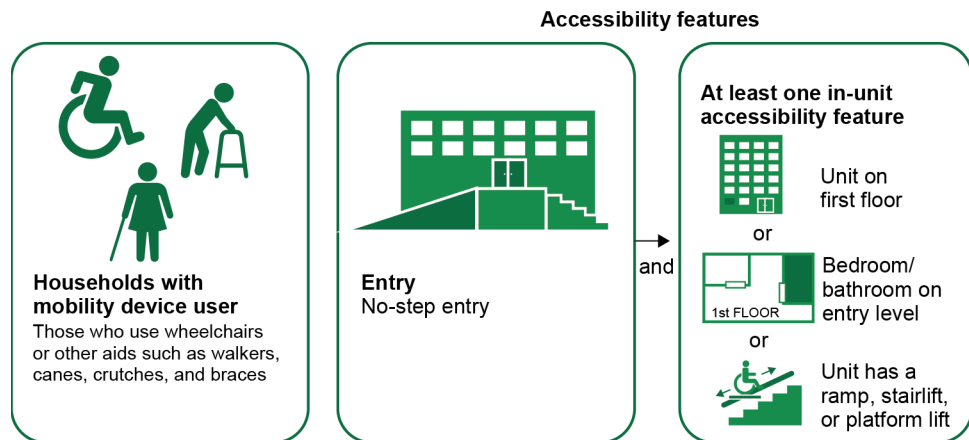
Source: GAO analysis of Department of Housing and Urban Development information. | GAO-23-106339

Public housing and PBRA providers are responsible for making and paying for structural modifications requested by tenants (or providing other reasonable accommodations instead).<sup>15</sup> Under the Fair Housing Act, private landlords accepting Housing Choice Vouchers must allow tenants to make reasonable structural modifications to the premises, but may require the tenant to pay for the modification or place some funds in escrow to undo the modification once they move out.<sup>16</sup>

**What share of assisted households with disabilities have units with accessibility features?**

According to the 2019 AHS, most HUD-assisted households with a mobility device user reported living in buildings with a no-step entry and at least one in-unit accessibility feature (see fig. 5).<sup>17</sup> However, hundreds of thousands of such households reported living in units without those accessibility features.

**Figure 5: Definitions for Mobility Device User and Accessibility Features**

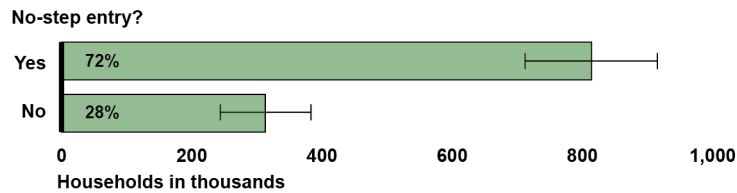


Sources: GAO (analysis); 4luck/stock.adobe.com (icons). | GAO-23-106339

Note: We used American Housing Survey (AHS) data on households with at least one member who used a mobility device as a proxy for a household that would need accessibility features. The AHS asks about the features shown in this graphic—we refer to them as accessibility features for the purposes of this report.

Among assisted households with a mobility device user, an estimated 72 percent (about 800,000) reported living in buildings with a no-step entry, meaning they did not have to climb any stairs to enter (see fig. 6).

**Figure 6: Proportion of HUD-Assisted Households with a Mobility Device User That Reported a No-Step Entry, 2019**

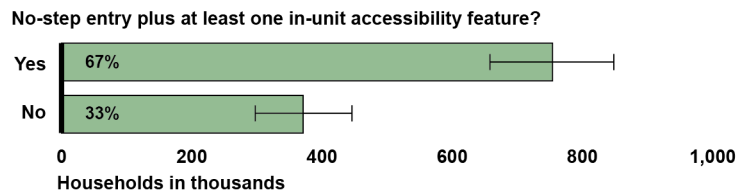


HUD = Department of Housing and Urban Development  
 Source: GAO analysis of 2019 American Housing Survey. | GAO-23-106339

Note: Estimates in this figure have a relative margin of error of plus or minus 12–22 percent of the estimate at the 95 percent confidence level.

We also looked at whether households with a mobility device user had either a unit on one level, an entry-level bedroom and bathroom, or a means to get up stairs (ramp or lift).<sup>18</sup> An estimated 67 percent (about 750,000) of assisted households with a mobility device user reported living in buildings with a no-step entry and at least one in-unit accessibility feature (see fig. 7).

**Figure 7: Proportion of HUD-Assisted Households with a Mobility Device User That Reported a No-Step Entry and In-Unit Accessibility Features, 2019**



HUD = Department of Housing and Urban Development  
 Source: GAO analysis of 2019 American Housing Survey. | GAO-23-106339

Note: Estimates in this figure have a relative margin of error of plus or minus 12–20 percent of the estimate at the 95 percent confidence level.

Finally, we analyzed the prevalence of accessibility features among unassisted households with a mobility device user (regardless of income) and found these households were less likely to report accessibility features than assisted households. Specifically, 53 percent of unassisted households reported living in units with a no-step entry and in-unit accessibility features compared to 67 percent of assisted households.

The presence of these accessibility features may be helpful for some households with disabilities, but does not mean that the rental unit meets minimum accessibility requirements imposed by law.<sup>19</sup>

**Why might some assisted households not live in units with accessibility features?**

HUD-assisted households with disabilities may not live in accessible units or units with accessibility features for several reasons. For example:

- Fully accessible units are limited in number. According to AHS, the majority of rental units in the United States pre-date certain accessible design and construction requirements imposed by law.<sup>20</sup>
- Older housing can be difficult to modify. For example, two public housing agency representatives told us that they face challenges increasing accessibility in their public housing portfolio, particularly in older housing stock, which was not built to modern accessibility standards. Specifically, older buildings pose structural constraints that can make it difficult to widen doorways or eliminate steps in a unit.



- Low-income households with disabilities seeking units on the private market generally face tradeoffs in choosing between units with more accessibility features in newer construction, or more affordable units in older buildings with fewer accessibility features. One housing advocate told us that households with disabilities that live in private housing (including units rented with a Housing Choice Voucher) generally seek structural modifications or other accommodations from landlords to increase accessibility in their units. The Fair Housing Act does not require private landlords to pay for structural modifications.<sup>21</sup>
- Finally, one public housing agency told us that funding for structural modifications for Housing Choice Voucher recipients is limited, in part because no dedicated funding exists for them. Public housing agencies may use some program administrative funding to help Housing Choice Voucher tenants pay for modifications.

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## Agency Comments

We provided a draft of this report to HUD for review and comment. HUD provided technical comments, which we incorporated as appropriate.

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## How GAO Did This Study

To inform all of our work, we reviewed laws and regulations governing selected HUD rental assistance programs and HUD program policies and procedures, and we interviewed HUD officials. We focused on HUD’s three main rental assistance programs—Housing Choice Vouchers, public housing, and PBRA—because they serve the most renters.<sup>22</sup>

To assess the extent to which HUD serves households with disabilities, we analyzed data from the 2019 AHS, which was the most recently available version when we conducted our analysis. The AHS is sponsored by HUD and conducted by the U.S. Census Bureau and provides information about the size, composition, and quality of the nation’s housing.

Specifically, we analyzed AHS data to examine the prevalence of certain characteristics, such as income and disability status, among renter households with disabilities that were income-eligible for HUD rental assistance. The data include households that received HUD assistance and those that did not. We also analyzed the data to determine the prevalence of certain accessibility features in units occupied by assisted and unassisted households.

For this analysis, we used the “mobility device user” variable as a proxy for households that might need certain accessibility features for their housing unit. A household with a mobility device user is one that reported having at least one member who used equipment (such as a wheelchair) to get around because of a long-term condition. We defined two categories of accessibility features: (1) no-step entry, to indicate whether renters could enter their home without using stairs; and (2) no-step entry plus additional in-unit features, including a unit on one level, an entry-level bedroom and bathroom, or a means to climb stairs (such as a ramp or lift).

To assess the reliability of AHS data, we reviewed Census Bureau technical documentation for the survey, discussed the data with HUD officials, and conducted electronic and statistical testing. We determined the data were sufficiently reliable for reporting how many households with disabilities HUD served in 2019 and how many households with a mobility device user reported accessibility features.

To describe how housing providers match HUD-assisted households with disabilities to units that meet their accessibility needs, we reviewed documentation from and interviewed representatives of five public housing agencies. We selected the largest public housing agency in each of the largest metropolitan areas in the four Census regions: Chicago, Dallas, Los Angeles, and New York City (two public housing agencies in New York City separately administer the Housing Choice Voucher and public housing programs). We also interviewed four Fair Housing Initiatives Program agencies (one in each of the selected locations) to learn more about challenges low-income renter households with disabilities may face when seeking affordable, accessible housing.

We conducted this performance audit from October 2022 to March 2023 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

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## List of Addressees

The Honorable Jan Schakowsky  
Chair  
Subcommittee on Innovation, Data, and Commerce  
Committee on Energy and Commerce  
House of Representatives

The Honorable Tammy Duckworth  
United States Senate

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## Endnotes

<sup>1</sup>Federal civil rights laws require that households with disabilities have equal opportunities, including with respect to housing. See, e.g., the Fair Housing Act (codified as amended at 42 U.S.C. §§ 3601-3619) and 24 C.F.R. pt. 100; Section 504 of the Rehabilitation Act of 1973 (codified as amended at 29 U.S.C. § 794) and 24 C.F.R. pt. 8; Title II of the Americans with Disabilities Act (codified as amended at 42 U.S.C. §§ 12131-12165) and 28 C.F.R. pt. 35; and the Architectural Barriers Act of 1968 (codified as amended at 42 U.S.C. §§ 4151-4156) and 24 C.F.R. pt. 40.

<sup>2</sup>This report excludes some HUD programs, such as HOME Investment Partnerships, Housing Opportunities for Persons With AIDS, and Continuum of Care. These programs also provide rental assistance to households with disabilities but serve a relatively small number of renters compared to HUD's three main rental assistance programs.

<sup>3</sup>In our discussion of HUD programs that serve households with disabilities, we use "PBRA" to refer collectively to the Section 8 PBRA, Section 202 Supportive Housing for the Elderly, and Section 811 Supportive Housing for Persons with Disabilities programs. We define these programs and the populations they serve later in the report.

<sup>4</sup>Section 8 PBRA refers to certain project-based rental assistance provided under section 8 of the Housing Act of 1937 (codified as amended at 42 U.S.C. § 1437f), which HUD refers to as "Project-Based Section 8." Separately, under the Housing Choice Voucher program, public housing agencies may allocate a certain percentage of vouchers to specific units (known as Project-Based Vouchers). These vouchers are counted as Housing Choice Vouchers in our analysis of AHS data. We otherwise did not include Project-Based Vouchers in the scope of this report.

<sup>5</sup>All estimates are based on our analysis of 2019 AHS data. Unless otherwise noted, relative margins of error for all estimates are below 22 percent of the estimate at the 95 percent confidence level. Note that in 2019, HUD assisted a total of 4.5 million households but we refer to the 4.4 million households that reported their disability status.



<sup>6</sup>There are varying definitions of disability under federal laws, regulations, programs, and surveys. For example, AHS defines disability using six categories: hearing, vision, mental, physical, self-care, and go-outside-home disabilities. Respondents were asked whether anyone in their household (1) was deaf or had serious difficulty hearing (hearing disability); (2) was blind or had serious difficulty seeing even when wearing glasses (vision disability); (3) had serious difficulty concentrating, remembering, or making decisions because of a physical, mental, or emotional condition (mental disability); (4) had difficulty walking or climbing stairs (physical disability); (5) had difficulty dressing or bathing (self-care disability); and (6) had difficulty doing errands alone because of a physical, mental, or emotional condition (go-outside-home disability). AHS collects information on hearing and vision disabilities for all household members; on mental, physical, and self-care disabilities for household members at least 5 years of age; and on go-outside-home disabilities for members at least 15 years of age. Federal civil rights laws, including the Fair Housing Act, Section 504 of the Rehabilitation Act, and Title II of the Americans with Disabilities Act, define “disability” as a (1) a physical or mental impairment that substantially limits one or more major life activities, (2) a record of having such an impairment, or (3) being regarded as having such an impairment. See, e.g., 29 U.S.C. § 705(9)(B) and 42 U.S.C. §§ 3602(h), 12102(1). According to HUD officials, the agency uses the definition of “disability” from the Housing Act of 1937 (as amended) for program eligibility and data collection purposes. Pub. L. No. 75-412, 50 Stat. 88 (codified as amended at 42 U.S.C. §§ 1437-1437bbb-9). The act authorizes several HUD rental assistance programs and defines a person with disabilities as having (1) a disability as defined in Section 223 of the Social Security Act; (2) a physical, mental, or emotional impairment that is expected to be of long and indefinite duration, substantially impedes their ability to live independently, and could be improved by more suitable housing conditions; or (3) a developmental disability as defined in Section 102 of the Developmental Disabilities Assistance and Bill of Rights Act. § 3 (codified as amended at 42 U.S.C. § 1437a(b)(3)(E)). According to HUD data, 23 percent of assisted households had a member with a disability in 2019.

<sup>7</sup>We use “income-eligible” to refer to households categorized by AHS as “eligible, but not HUD-assisted.” According to AHS, these households do not currently receive HUD rental assistance but meet the “low income” requirement for such assistance. Income-eligible households may not have received assistance for several reasons, including that they (1) were placed on a waitlist for assistance because assistance was not available, (2) did not apply for assistance; and (3) applied for but were denied assistance based on other program eligibility requirements.

<sup>8</sup>Based on AHS data, we estimated that HUD assisted 656,000 households through PBRA. As shown in figure 3, the AHS data includes households assisted through Section 8 PBRA (also known as Project-Based Section 8), Section 202 Supportive Housing for the Elderly, Section 811 Supportive Housing for Persons with Disabilities, and other programs that provide project-based subsidies to assist low-income households. This AHS data cannot be disaggregated by program.

<sup>9</sup>HUD officials pointed out that housing providers’ obligations may differ based on the type of HUD rental assistance provided, including with respect to Project-Based Vouchers. While Project-Based Vouchers were included as Housing Choice Vouchers in our analysis of AHS data, they are not otherwise included in the scope of this report.

<sup>10</sup>See 24 C.F.R. § 8.27(a). For HUD-subsidized multifamily projects (including public housing and PBRA) in post-1988 buildings, at least 5 percent of units must be accessible for households with mobility impairments and 2 percent of units must be accessible for households with vision or hearing impairments. 24 C.F.R. § 8.22. Additional requirements apply with respect to alterations and in some other circumstances. See, e.g., 24 C.F.R. §§ 8.23, 891.310. In addition, the Fair Housing Act standards for accessible design and construction apply to covered multifamily properties for first occupancy after March 13, 1991. 42 U.S.C. § 3604(f)(3)(C); 24 C.F.R. § 100.205.

<sup>11</sup>24 C.F.R. § 8.28(a)(3).

<sup>12</sup>See, e.g., 24 C.F.R. §§ 8.20, 8.24, 8.33. Providers of HUD-assisted housing must operate housing programs so that the programs are readily accessible to and usable by individuals with disabilities. Housing providers may comply with this requirement through such means as relocation to accessible buildings, alteration of existing facilities, construction of new facilities, or any other methods that result in making its programs or activities readily accessible. A housing provider is not required to take actions that it can demonstrate would result in a fundamental alteration in the nature of its program or activity or in undue financial and administrative burdens. For more information, see Department of Housing and Urban Development, “Section 504: Frequently Asked Questions,” last accessed March 21, 2023, available at [https://www.hud.gov/program\\_offices/fair\\_housing\\_equal\\_opp/disabilities/sect504faq](https://www.hud.gov/program_offices/fair_housing_equal_opp/disabilities/sect504faq).

<sup>13</sup>See, e.g., 24 C.F.R. §§ 982.303(b)(2), 982.505(d); Department of Housing and Urban Development, Housing Choice Voucher Program Guidebook: Payment Standards (Washington, D.C.: November 2020), 18.

<sup>14</sup>According to HUD officials, properties receiving federal financial assistance are required to come into compliance with Section 504 of the Rehabilitation Act, particularly if any alterations have occurred. However, HUD officials noted that not all properties have done so. Additionally, properties built before 1991 are not subject to the Fair Housing Act standards for accessible design and construction.

<sup>15</sup>Providers of HUD-assisted housing must operate housing programs so that the programs are readily accessible to and usable by households with disabilities. 24 C.F.R. § 8.24(a). Housing providers may comply with this requirement by making structural modifications; however, they are not required to do so where other methods are effective in achieving compliance or if doing so would be an undue financial and administrative burden. 24 C.F.R. § 8.24(a)(2), (b).

<sup>16</sup>See 42 U.S.C. § 3604(3)(A) and 24 C.F.R. § 100.203.

<sup>17</sup>AHS does not measure whether housing units meet minimum accessibility requirements imposed by law. See, e.g., 24 C.F.R. §§ 8.32, 40.4, 100.205 and 28 C.F.R. §§ 35.150-151. Rather, AHS measures whether units have certain features, such as a bedroom and bathroom on the entry level or a ramp or stair lift. We refer to these collectively as accessibility features for this report.

<sup>18</sup>AHS asks respondents a series of questions related to accessibility features, including whether their home has each of the following: (1) a ramp; (2) a chairlift, stair lift, or platform lift; (3) a bedroom on the entry level; and (4) a full bathroom on the entry level. AHS does not ask about the presence of any other accessibility features, except a no-step entry.

<sup>19</sup>See, e.g., 24 C.F.R. §§ 8.32, 40.4, 100.205 and 28 C.F.R. §§ 35.150-151.

<sup>20</sup>As previously noted, for HUD-subsidized multifamily projects in post-1988 buildings (including public housing and PBRA), at least 5 percent of units must be accessible for households with mobility impairments and 2 percent of units must be accessible for households with vision or hearing impairments. 24 C.F.R. § 8.22. Additional requirements apply with respect to alterations and in some other circumstances. See, e.g., 24 C.F.R. §§ 8.23, 891.310. In addition, the Fair Housing Act standards for accessible design and construction apply to covered multifamily properties for first occupancy after March 13, 1991. 42 U.S.C. § 3604(f)(3)(C); 24 C.F.R. § 100.205.

<sup>21</sup>See 42 U.S.C. § 3604(3)(A) and 24 C.F.R. § 100.203.

<sup>22</sup>As previously discussed, for purposes of our discussion of HUD programs that serve households with disabilities, we use “PBRA” to refer collectively to the Section 8 PBRA, Section 202 Supportive Housing for the Elderly, and Section 811 Supportive Housing for Persons with Disabilities programs. We also use AHS data to estimate the number of households HUD serves through PBRA. This AHS data includes Section 8 PBRA, Section 202 Supportive Housing for the Elderly, Section 811 Supportive Housing for Persons with Disabilities, and several additional programs that provide project-based subsidies to assist low-income households. This AHS data cannot be disaggregated by program.

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