JUSTICE IN AGING
FIGHTING SENIOR POVERTY THROUGH LAW

June 29, 2026

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Regulations Division, Office of General Counsel
U.S. Department of Housing and Urban Development
451 7th Street SW, Room 10276
Washington, DC 20410-500

**RE: Docket No. FR-6518-P-01; Comments in Response to Proposed Rulemaking on Equal Access to Housing in HUD Programs Revisions**

Justice in Aging appreciates the opportunity to provide comments on the U.S. Department of Housing and Urban Development's (HUD's) Notice of Proposed Rulemaking (NPRM), "Equal Access to Housing in HUD Programs Revisions." Justice in Aging is a national legal advocacy organization with the mission of improving the lives of low-income older adults. We use the power of law to fight senior poverty by securing access to affordable housing, health care, and economic security for older adults with limited resources. We focus our efforts primarily on fighting for older adults who have been marginalized and excluded from justice, such as LGBTQ+ individuals, women, and people of color.

Justice in Aging strongly opposes HUD's NPRM, which seeks to undermine HUD's 2012 and 2016 Equal Access Rules. This proposed rule would especially harm transgender individuals by requiring HUD-funded shelters to exclude transgender people from single-sex facilities that align with their gender identity. If implemented, this proposed rule will gravely harm LGBTQ+ communities, including older adults and people with disabilities who are increasingly experiencing homelessness and housing insecurity. Without the protections outlined in the Equal Access Rules, LGBTQ+ older and disabled adults will be denied access to shelters and experience increased housing discrimination.

In addition to harming older adults and people with disabilities, HUD's proposed rule is unlawful for several reasons. HUD's proposal contravenes HUD's statutory purpose and duty to affirmatively further fair housing. The proposed rule also violates the Administrative Procedure Act and Section 504 of the Rehabilitation Act.

We urge HUD to withdraw this NPRM and instead work to fulfill its mission of creating "inclusive communities and quality affordable homes for all residents."[1]

**HUD's NPRM will cause significant harm to multiple LGBTQ+ communities, including older and disabled people**

LGBTQ+ people face many inequities, including problems accessing housing as a result of discriminatory policies, practices, and behaviors. Studies show that 17% of people in the LGBTQ+ community experienced homelessness at some point in their life, and transgender people in particular report even

[1] HUD, Multifamily Residents (last visited June 25, 2026).

higher rates at 30%.[2] Housing insecurity for LGBTQ+ people, especially trans and gender nonconforming people, is inseparable from stigma and hostilities against the LGBTQ+ communities. Rampant homophobia and other prejudice in families and social circles—as well as within systems like renting, employment, lending, and healthcare—create the conditions that lead LGBTQ+ individuals to become unhoused. HUD's NPRM seeks to sanction these discriminatory practices and further alienate LGBTQ+ people from accessing services that would help lift them out of homelessness.

The inequities are greater for LGBTQ+ individuals at the intersection of multiple marginalized identities, like age, disability, and race or ethnicity. For example, 59% of American Indian and 51% of Black transgender women report having experienced homelessness at some point in their lives.[3] For individuals living in rural areas or small towns, these inequities may be exacerbated as the availability of services is lower and community hostilities can be higher.[4]

Research has shown repeatedly that LGBTQ+ individuals are driven to prolonged homelessness when they encounter shelters and support programs that are actively hostile toward them, are not culturally responsive, or fail to intervene when cisgender/heterosexual peers harass LGBTQ+ individuals. The 2012 and 2016 Equal Access Rules make up one of the only explicit federal protections for LGBTQ+ individuals, and undermining them will exacerbate the housing discrimination they experience.

Housing instability for LGBTQ+ people harms mental and physical health and raises the risk of death. A 2016 study of transgender individuals found that over 60% of those who were evicted or denied housing had thoughts of suicide, with more than 19% attempting suicide.[5] Moreover, unhoused people generally have a 60% higher chance of mortality compared to housed low-income people as a result of environmental conditions, violence, and negative health implications.[6]

The cost of implementing HUD's NPRM is not limited to the irreparable harm to LGBTQ+ individuals. As homelessness rises, so does the likelihood of the use of emergency healthcare and crises services, the cost of which is ultimately borne by states and subsequently by other low-income residents who are harmed when state funding becomes scarce.[7] Unhoused individuals are significantly more likely than housed people to need emergency health care and to rely on hospitals' emergency departments for routine health care, and are more than three times more likely to be uninsured.[8] When states step in to provide services to uninsured or underinsured patients, or otherwise provide supportive services to unsheltered people, those same resources cannot be used on other important services for their low-income residents.

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[2] Nat'l Coalition for the Homeless, Homelessness Among the LGBTQ Community (last visited June 11, 2026); Williams Inst., LGBT People and Housing Affordability, Discrimination, and Homelessness 14 (2020).
[3] Williams Inst., LGBT People and Housing Affordability, Discrimination, and Homelessness 14 (2020). compared to the national average for all transgender people which is 30%)
[4] *See, e.g.,* The Trevor Project, Research Brief: LGBTQ Youth in Small Towns and Rural Areas (Nov. 2021).
[5] Williams Inst., LGBT People and Housing Affordability, Discrimination, and Homelessness 16 (2020).
[6] Nat'l Health Care for the Homeless Council, Mortality and Homelessness (Oct. 2024).
[7] Nat'l Alliance to End Homelessness, Ending Chronic Homelessness Saves Taxpayers (Feb. 2017).
[8] *See, e.g.,* Margot Kerry et al., *Emergency Department Use Among the Homeless and Marginally Housing: Results From a Community-Based Study,* Am. J. Public Health (May 2002); Nat'l Health Care for the Homeless Council, Health Insurance at HCH Programs (2023).

### *a. Harms to LGBTQ+ older adults*

Older adults experience the highest poverty rate among any age group, and they are the fastest-growing group among people experiencing homelessness.[9] Of the over 2.7 million LGBTQ+ older adults in the U.S., approximately a third live below 200% of the federal poverty line.[10] For LGBTQ+ older adults, the likelihood of poverty—and ultimately the risk of homelessness and need for affordable housing—is greater due to systemic inequities that compound over one's lifetime.

Today's LGBTQ+ older adults still experience the economic consequences of pervasive stigma and state-sanctioned discrimination from earlier decades, such as the demonization of LGBTQ+ communities in the 1980s during the HIV/AIDs epidemic. For example, discrimination in employment translates to lower retirement savings and Social Security income in older age. Discrimination from landlords and lenders result in fewer housing options and unaffordable housing costs for years. Barriers accessing medical care, as well as the negative health implications resulting from chronic discrimination, lead to higher medical costs, especially in older age.[11] The compounded effect of these inequities means that LGBTQ+ older adults often experience economic insecurity and have a higher need for affirming shelter and subsidized housing.

For LGBTQ+ older adults belonging to other marginalized communities, the likelihood of housing insecurity and risk of homelessness is even higher. Not only are LGBTQ+ older adults of color more likely to have experienced housing discrimination in the past, but they also report being very concerned about care denial or harassment when trying to access supportive services in the future.[12] Studies show that up to 40% of LGBTQ+ older adults have a disability, which compounds the barriers for accessing safe and accessible housing.[13]

Housing assistance from HUD is crucial for LGBTQ+ older adults living on fixed incomes. Rising housing costs mean that more older adults are increasingly less able to afford rent. For LGBTQ+ older adults who have high medical bills due to a lifetime of health care inequities—for example, discrimination by providers or care avoidance due to stigma—the financial strain is even higher. Housing discrimination against LGBTQ+ individuals has a profound impact on older adults, many of whom decide to "re-closet" or delay gender-affirming care in order to access housing.[14] The Equal Access Rules are a critical protection that enables LGBTQ+ older adults to age with dignity by guaranteeing access to affordable housing without the looming threat of discrimination, eviction, or harassment.

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[9] U.S. Census Bureau, Poverty and Health Insurance in the United States: 2024 (Sept. 9, 2025); U.S. Gov. Accountability Office, More Older Adults are Homeless—What Can be Done to Help This Vulnerable Population with Unique Needs (Jan 16, 2025).

[10] Movement Advancement Project, Understanding Issues Facing LGBT Older Adults 2 (June 2019).

[11] Justice in Aging and SAGE, "Supporting LGBTQ+ Older Adults' Basic Needs" (September 2025), available at https://justiceinaging.org/supporting-lgbtq-older-adults-basic-needs/.

[12] Movement Advancement Project, Understanding Issues Facing LGBT Older Adults 7 (June 2019); AARP, Maintaining Dignity: Understanding and Responding to the Challenges Facing Older LGBT Americans 11, 42-43, 50 (Mar. 2018).

[13] Karen Fredriksen-Goldsen et al., The Aging and Health Report: Disparities Resilience among Lesbian, Gay, Bisexual, and Transgender Older Adults (2012); AARP, LGBTQ Adults 45+ Are Worried About Discrimination And Support As They Age (2022).

[14] Mikhal Weiner, Prism, Queer and trans elders find overwhelming barriers and discrimination in search of safe housing (Jan. 19, 2023).

LGBTQ+ older adults have fewer social supports to fall back on when facing housing insecurity, making affordable or emergency housing options from HUD even more necessary. A significant percentage of people attribute their homelessness to familial rejection of the individual's sexuality or gender expression.[15] LGBTQ+ older adults are also less likely to have familial supports in later life. Those 50 and older are twice as likely to be single in older age and live alone, and they are four times less likely to have children.[16] Lack of supportive social networks means that low-income LGBTQ+ older adults have a greater likelihood of becoming unhoused and make the protections under the Equal Access Rules even more critical.

Homelessness increases health and safety risks for older adults. For example, unhoused older adults have a higher risk of falling, which is a common cause of morbidity for older people.[17] Older adults experiencing homelessness also have problems with walking, vision, and hearing, and they experience dementia at higher rates than their housed counterparts.[18] The health inequities from decades of inadequate or discriminatory care by healthcare professionals may lead unhoused LGBTQ+ older adults to have more serious medical issues, which may be worsened by avoiding care and medications due to fear of continued discrimination.[19] Further, both long-term and late-in-life homelessness are associated with accelerated aging (i.e., early onset of functional and cognitive decline), and high rates of premature mortality among older adults.[20]

Housing insecurity also places LGBTQ+ older adults at a significant risk of institutionalization and potentially harassment. Many older adults need some type of help performing activities of daily living, such as bathing, toileting, or moving from one position to another.[21] While most older adults prefer to age in place with home- and community-based services (such as help from a caregiver), older adults who are not consistently housed can rarely access in-home support. Older adults may instead face involuntary institutionalization in nursing homes. For LGBTQ+ older adults, however, such a placement can be especially traumatic. LGBTQ+ older adults frequently experience harassment and care denial in institutional settings like nursing facilities, and as a result many report going back into the closet.[22]

Older adults comprise a growing number of households in HUD programs, making up 42% of all households in HUD's major rental assistance programs and around 27% of people in adult-only households staying in shelters.[23] As the population of low-income and unhoused older adults rises,

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[15] Williams Inst., LGBT People and Housing Affordability, Discrimination, and Homelessness 16 (2020).
[16] SAGE, The facts on LGBT aging (2025).
[17] Elizabeth Abbs et al., J. Gen. Intern. Med., Risk Factor for Falls in Older Adults Experiencing Homelessness: Results form the HOPE HOME Cohort Study (Jan. 2020).
[18] Nat'l Coalition for the Homeless, Elder Homelessness in America (last visited June 11, 2026).
[19] *See* Williams Inst., LGBT People and Housing Affordability, Discrimination, and Homelessness 17 (2020).
[20] Rebecca Brown et al., JAMA Intern. Med., Factors Associated with Mortality Among Homeless Older Adults in California (Aug. 29, 2022).
[21] Admin. For Community Living, How Much Care Will You Need? (last modified Feb. 18, 2020) (estimating 70% of people turning 65 need some type of long-term care services or supports).
[22] Williams Inst., LGBT People and Housing Affordability, Discrimination, and Homelessness 20 (2020); Angela Houghton, AARP, Maintaining Dignity: A Survey of LGBT Adults Age 45 and Older (Mar. 26, 2018).
[23] HUD, 2022 Annual Homelessness Assessment Report (AHAR) to Congress, Part 2 (August 2024); Office of the Ass. Secretary for Planning & Evaluation, Addressing Homelessness Among Older Adults: Final Report, Section 2 Size, Characteristics, and Needs of the Population of Older Adults Experiencing Homelessness (Oct. 26, 2023); Mark Treskon & Susan Popkin, Urban Inst., Staffing and Funding Cuts at HUD Would Have an Outsize Effect on Older Adults (Apr. 9, 2025).

protections around sexual orientation and gender identity become all the more crucial to ensure that LGBTQ+ older adults have access to shelters and affordable housing.

### b. *Harms to LGBTQ+ people with disabilities*

LGBTQ+ people with disabilities – many of whom are also older adults – need access to shelters and affordable housing through HUD programs. The intersection of disability and sexual orientation and gender identity is clear: 48% of LGBTQ+ people and 70% of transgender people have a disability.[24] Adults with disabilities experience poverty at twice the rate as those without a disability, both because people with disabilities are more likely to enter into poverty, and people in poverty are more likely to be born with or acquire a disability later in life.[25] Therefore, LGBTQ+ people with disabilities are more likely to experiencing housing insecurity.

Compounded inequities in health care, employment, education, banking, and other areas lead to LGBTQ+ people with disabilities to experience higher rates of economic insecurity. In 2024, over 30% of LGBTQ people with disabilities earned less than $30,000 annually. Adults with disabilities are less likely to be employed due to workplace discrimination, which translates to a reduced ability to afford rising housing costs across the U.S.[26] Similarly, individuals with disabilities are more likely to have high medical care costs and therefore accumulate medical debt.[27] The likelihood of being cost-burdened and priced out of housing is even higher for Black and Hispanic people with disabilities.[28]

HUD programs that offer affordable housing options are a lifeline for low-income LGBTQ+ people with disabilities. As of 2024, 13% of LGBTQ+ individuals with a disability received housing assistance.[29] LGBTQ+ people with disabilities are more likely to be renters than their non-LGBTQ+ or non-disabled counterparts, and they report experiencing more discrimination or access barriers in rental settings.[30] Fifteen percent of renters with disabilities struggle to pay rent on time, and nearly 20% of renters with a disability are not confident in their ability to pay next month's rent.[31] For LGBTQ+ disabled people who are able to access HUD programs, this assistance helps keep these households out of homelessness and poverty.

Access to HUD-funded shelters is similarly crucial for LGBTQ+ people with disabilities. Between 25% and 50% of unhoused individuals have an intellectual, physical or cognitive disability.[32] Unsheltered homelessness leads to people with disabilities living on the streets and in environments that are dangerous for their health and well-being. Many remain unsheltered because of challenges accessing

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[24] Mia Ives-Rublee et al., Ctr. For American Progress, The State of Disabled LGBTQI+ People in 2024 (Jul. 15, 2025).
[25] Nat'l Disability Inst., Financial Inequality: Disability, Race and Poverty in America 20 (2019).
[26] *See* Nat'l Disability Inst., Financial Inequality: Disability, Race and Poverty in America 14 (2019).
[27] Nat'l Disability Inst., Financial Inequality: Disability, Race and Poverty in America 16 (2019).
[28] Nat'l Disability Inst., Financial Inequality: Disability, Race and Poverty in America 14-16 (2019); Jaboa Lake et al., Ctr. For American Progress, Recognizing and Addressing Housing Insecurity for Disabled Renters (May 27, 2021).
[29] Mia Ives-Rublee et al., Ctr. For American Progress, The State of Disabled LGBTQI+ People in 2024 (Jul. 15, 2025).
[30] Mia Ives-Rublee et al., Ctr. For American Progress, The State of Disabled LGBTQI+ People in 2024 (Jul. 15, 2025). Jaboa Lake et al., Ctr. For American Progress, Recognizing and Addressing Housing Insecurity for Disabled Renters (May 27, 2021).
[32] Jack Preisser, Carleton Accessibility Digest, Disability and Homelessness in America (Mar. 10, 2025); Nat'l Alliance to End Homelessness, People with Unaddressed Health Conditions (last visited June 11, 2026).

shelters that can meet their disability-related needs.[33] Yet HUD's proposed rule will further reduce shelter options for LGBTQ+ people with disabilities.

**The proposed rule conflicts with HUD's statutory purpose**

In issuing its 2016 Equal Access Rule, HUD noted that "HUD's mission is to create strong, sustainable, inclusive communities and quality affordable homes for all." HUD stressed that excluding any eligible persons from HUD programs because of that person's gender identity or gender nonconformity would "contravene HUD's responsibility under the Department of Housing and Urban Development Act to work to address 'the needs and interests of the Nation's communities and of the people who live and work in them.'"[34] This proposed rule seeks to do what HUD itself has previously identified as contravening HUD's mission and statutory purpose.

**The proposed rule conflicts with HUD's statutory obligation to affirmatively further fair housing**

This proposed rule also conflicts with the Fair Housing Act (FHA)'s statutory mandate for HUD to administer its programs and activities in a manner that affirmatively furthers fair housing (AFFH).[35] Courts have interpreted the AFFH mandate to require HUD to play an active role in ending housing discrimination.[36] Through this proposed rule, HUD will instead perpetuate housing discrimination and contradict its longstanding prior positions on protections for LGBTQ+ people.

Following the Supreme Court's ruling in *Bostock v. Clayton Co.,*[37] HUD concluded in 2021 that the FHA's prohibition against sex discrimination included discrimination on the basis of sexual orientation and gender identity. HUD then expanded the scope of its fair housing enforcement activity accordingly.[38] These actions were consistent with HUD's prior efforts, through its 2012 and 2016 Equal Access Rules, to ensure that every person has equal access to HUD programs regardless of sexual orientation and gender identity. Now, however, HUD suddenly seeks to reverse more than a decade of its own work to promote protections for LGBTQ+ people to the fullest extent possible under the FHA. By requiring and reinforcing sex-based discrimination against LGBTQ+ people, HUD will limit housing opportunities for this group in violation of its duty to AFFH.

**HUD fails to provide sufficient reasoning for reversing prior policy**

HUD's proposed rule fails to sufficiently justify the agency's policy reversals, and it offers no evidence to support its false claim that transgender women pose a safety risk to other women in shelters. Under the Administrative Procedure Act, when an agency contradicts prior policy, it must provide a reasoned explanation for disregarding facts and circumstances that underlay the prior policy.[39] Here, HUD cites no

[33] Jack Preisser, Carleton Accessibility Digest, Disability and Homelessness in America (Mar. 10, 2025).
[34] HUD, Equal Access in Accordance With an Individual's Gender Identity in Community Planning and Development Programs, 81 Fed Reg. 64769 (September 2016); 42 U.S.C. 3531.
[35] 42 U.S.C. § 3608(e)(5).
[36] See, e.g., Nat'l Fair Hous. All. v. Carson, 330 F. Supp. 3d 14, 25 (D.D.C. 2018).
[37] Bostock v. Clayton County, 590 U.S. 644, 140 S. Ct. 1731, 207 L. Ed. 2d 218 (2020).
[38] HUD, Implementation of Executive Order 13988 on the Enforcement of the Fair Housing Act (February 2021).
[39] F.C.C. v. Fox Television Stations, Inc., 556 U.S. 502, 515–16, 129 S. Ct. 1800, 1811, 173 L. Ed. 2d 738 (2009).

relevant research about transgender women in shelters. Nor does HUD cite any examples of harm that occurred to women in HUD-funded shelters as a result of the 2016 Equal Access Rule.

In contrast, HUD's 2016 Equal Access Rule was the result of years of HUD research and monitoring. In its 2012 Equal Access Rule, HUD declined to address the issue of shelter placement for transgender people because of the need to study the issue further.[40] After a four-year review of its own programs and national research, HUD then issued the 2016 Equal Access Rule after learning that all people could be safely accommodated in shelters in accordance with their gender identity. HUD also found that shelters could address privacy concerns by modifying policies or physical spaces, such as by scheduling access to bathing facilities or installing privacy screens.[41] In this proposed rule, HUD fails to explain why these evidence-based conclusions from a multi-year study are no longer valid.

**HUD's proposed rule violates Section 504 of the Rehabilitation Act**

HUD's proposed rule, if implemented, constitutes impermissible disparate treatment against people with gender dysphoria, who qualify as people with disabilities under Section 504. Section 504 prohibits discrimination on the basis of disability in programs and activities receiving federal financial assistance or conducted by federal agencies.[42] In *Williams v. Kincaid*, the Fourth Circuit held that the Americans with Disabilities Act (ADA) and Section 504 protect individuals with gender dysphoria.[43] The Court distinguished gender dysphoria – which is characterized by clinically significant distress felt by some transgender people – from "gender identity disorder," which is the mere fact of cross-gender identification and explicitly excluded from coverage under the ADA and Section 504.

Under this proposed rule, HUD will require HUD-funded shelters to bar transgender people's access to single-sex facilities when their biological sex does not match the sex accommodated by the facility. Because HUD's proposed rule intentionally discriminates against transgender people, it necessarily discriminates against all people with gender dysphoria. Only transgender people experience gender dysphoria (though not all do), and all people with gender dysphoria are transgender. This proposed rule therefore violates Section 504.

**The proposed rule will also result in providers violating disability rights laws**

HUD-funded shelter providers that intentionally discriminate against transgender people will not only violate Section 504, but also the ADA. HUD-funded shelters fall under Title II or Title III of the ADA.[44] Shelters that categorically discriminate against transgender people will violate the ADA by discriminating against people with gender dysphoria.

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[40] HUD, Equal Access in Accordance With an Individual's Gender Identity in Community Planning and Development Programs, 81 Fed Reg. 64772 (September 2016).
[41] *Id.*
[42] 29 U.S.C. § 794(a).
[43] Williams v. Kincaid, 45 F.4th 759, 779–80 (4th Cir. 2022). This case involved both Section 504 and ADA, with the two statutes providing identical protections with respect to the matters in the case. For simplicity, the court principally analyzed the ADA claim.
[44] *See* 28 C.F.R. §§ 35.102, 36.102.

Shelters will also violate the FHA for the same reason. Courts have found that the FHA, which prohibits disability discrimination, covers some shelters.[45] The FHA's definition of disability is modeled after Section 504's definition, and courts have recognized that these statutes should be interpreted consistent with each other.[46]

Moreover, HUD-funded providers have an obligation to grant reasonable accommodations for people with disabilities under various federal civil rights laws. HUD-funded shelters must provide reasonable accommodations under Section 504, the ADA, and sometimes the FHA. The granting of reasonable accommodations requires fact-specific, individualized determinations that account for (among other factors) whether the requested accommodation is necessary for the disabled person to have equal access to housing and services.[47] People with gender dysphoria may request reasonable accommodations in the form of access to shelters that align with their gender identity. To the extent that HUD's proposal prohibits reasonable accommodations, the proposed rule will put providers at risk of disability discrimination for failure to reasonably accommodate people with gender dysphoria.

**HUD's NPRM is part of a coordinated attack against LGBTQ+ communities**

HUD's NPRM is yet another unfounded attack by the Administration against LGBTQ+ communities, which only highlights the prevalence of LGBTQ+ discrimination. Since January 2025, the White House has issued several anti-LGBTQ+ Executive Orders, including Executive Order 14168, and federal agencies have proposed or promulgated anti-LGBTQ+ regulations and guidance.[48] The Trump Administration has also cut the federal workforce charged with enforcing anti-discrimination laws. All these actions have immense negative implications for LGBTQ+ people, including permitting unchecked discrimination and undermining anti-poverty programs. Moreover, the Administration and Congress continue to attack important safety net programs that low-income LGBTQ+ individuals rely on, such as Medicaid and Medicare, through funding cuts, eligibility restrictions, and other proposals.

The Administration's attacks correspond with increased anti-LGBTQ+ efforts at the state and local level. As of May 2026, 529 anti-LGBTQ+ bills are pending in state legislatures.[49] In 2025 alone, over 1,000 instances of extremist anti-LGBTQ+ incidents were reported in the U.S., including threats, harassment, property damage, and protests.[50] If implemented, HUD's NPRM, together with other anti-LGBTQ+ actions at the state and federal levels, will strip millions of LGBTQ+ people – including LGBTQ+ older and disabled adults – of their ability to live and age with dignity.

**Conclusion**

Thank you for your consideration of Justice in Aging's comments. We strongly oppose HUD's NPRM and urge HUD to retain current protections in the 2012 and 2016 Equal Access Rules. HUD must ensure that

[45] *See, e.g.,* Bentley v. Peace and Quiet Realty 2 LLC, 367 F.Supp.2d 341, 344 (E.D.N.Y.2005).
[46] U.S. v. Borough of Audubon, N.J., 797 F. Supp. 353 (D.N.J. 1991), judgment aff'd, 968 F.2d 14 (3d Cir. 1992) (citing House Report No. 711, 100th Cong., 2d sess. 22 (1988)).
[47] See, e.g., Southeastern Community College v. Davis, 442 U.S. 397 (1979)
[48] Executive Order 14168, Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government (Jan. 20, 2025); 91 Fed. Reg. 32198, Regulation for Federal Financial Assistance (May 29, 2026).
[49] ACLU, Mapping Attacks on LGBTQ Rights in U.S. State Legislatures in 2026 (May 29, 2026).
[50] GLAAD, Anti-LGBTQ Hate & Extremism: Where We Stand Today: GLAAD's Anti-LGBTQ Extremism Reporting Tracker (filtered to 1/1/2025 to 12/31/25) (last visited June 11).

LGBTQ+ communities, including older adults and people with disabilities, can access HUD programs without discrimination. If you have any questions, please contact Jennifer Kye at jkye@justiceinaging.org or Sahar Takshi at stakshi@justiceinaging.org.

Sincerely,

Denny Chan
Managing Director, Equity Advocacy