NATIONAL LOW INCOME HOUSING COALITION

April 24, 2023

Regulations Division
Office of General Counsel
U.S. Department of Housing and Urban Development
451 7th Street SW, Room 4176
Washington, DC 20410-5000

Via regulations.gov

Re: FR-6250-P-01
Affirmatively Furthering Fair Housing

We, the undersigned members of the National Low Income Housing Coalition's (NLIHC) Tenant Leader Cohort, write to thank the Biden-Harris administration for its unprecedented interest in advancing tenant protections through the proposed Affirmatively Furthering Fair Housing (AFFH) rule. Housing justice and racial justice are inextricably linked. As such, large-scale, sustained investments and anti-racist reforms are critical to ensure that people with the lowest incomes have quality homes that are accessible and affordable in communities of their choice.

NLIHC's Tenant Leader Cohort is a group of tenant advocates and community leaders with lived experience of housing insecurity who work towards housing justice and racial equity in their neighborhoods and greater communities. NLIHC collaborates with the Tenant Leader Cohort to inform its policy priorities so that these priorities best reflect the needs of low-income renters.

The proposed AFFH rule is an important step toward addressing structural racism and achieving greater racial equity and justice. We encourage the administration to strengthen fair housing protections as outlined below.

I. AREAS OF SUPPORT & RECOMMENDATIONS

A. Community Engagement

We support and welcome the proposed rule's discussion of improved public participation provisions, now termed "community engagement." Throughout the actual proposed text the rule reminds program participants of their community engagement obligations.

Areas of Support:

- Key words in §5.158 clearly convey the message that HUD intends community engagement to be "meaningful" and for program participants to "proactively facilitate

community engagement," and to "actively engage a wide variety of diverse perspectives."
- The proposed rule provides examples of potential sources of essential information to "connect with" advocates, public housing resident advisory boards, community-based organizations, service providers, and others.
- The proposed rule requires program participants to "employ communications methods to reach the broadest possible audience" with a focus on protected classes and "underserved communities."
- The proposed rule augments prior public participation provisions by calling for at least three public meetings during the development of an Equity Plan, and unlike the Consolidated Plan and PHA Plan public participation rules, calls for these meetings to be held at "various accessible locations and at different times to ensure" protected class groups and in particular "underserved communities" have greater opportunities for input.
- In addition to these three meetings, the proposed rule calls for two more meetings each year to obtain public input regarding how a program participant's progress toward meeting its fair housing goals from the previous year (Annual Progress Evaluations). We appreciate the use of the term "meetings" instead of "hearings" because meetings have the advantage of enabling more relaxed (less intimidating) engagement outside of the formality of a "hearing" at the city/county council chambers, at locations easier for underserved populations to reach, and on days and at times more accommodating to their work and family schedules.

Recommendations:
- We the undersigned have a number of concerns discussed starting on page 6.

B. Greater Public Transparency

We support and welcome greater public transparency in the process. Public engagement does not end once an Equity Plan is submitted to HUD for review because the public can directly provide to HUD, information relating to whether an Equity Plan was developed according to the community engagement requirements of §5.158 and whether: its content is deficient (such as whether fair housing issues were appropriately identified); information provided during the community engagement process was appropriately incorporated; fair housing issues were appropriately prioritized; and, fair housing goals are appropriate [§5.156(j)(3) and [§5.162(a)(1)].

Areas of Support:
- "Publication" provisions at §5.154(j) that require HUD to post on a HUD-maintained website, submitted Equity Plans and Annual Progress Evaluations, along with HUD "notifications" to program participants regarding concerns regarding a submitted Equity Plan – such as reasons HUD accepted an Equity Plan or HUD's communications with a program participant indicating why an Equity Plan was not accepted, along with actions a program participant can take to achieve acceptance [§5.162(a)(2)].

Recommendations:
- We urge HUD to modify the rule to require program participants to post on an easily identified webpage of their own website, their draft Equity Plans, submitted Equity Plans,

Annual Progress Evaluations, and key communications between HUD and the program participant. It is not sufficient for these materials to be posted on a HUD-maintained website. Nor is it sufficient for HUD to merely "encourage" program participants to post only their HUD-reviewed Equity Plans on their own websites as provided in the proposed rule.

C. Public Complaint Process

We welcome and support a formal public complaint process.

Areas of Support:

- The "community engagement" provision [§5.170(a)] which introduces a formal process of allowing the public to submit directly to HUD, complaints regarding allegations that a program participant has failed to comply with the AFFH regulations, its AFFH commitments, or that it has taken actions materially inconsistent with the obligation to AFFH as defined in the rule.
- HUD's obligation to process complaints and open a compliance review if warranted.

Recommendation:

- We suggest the rule establish a timeframe for acknowledging a complaint (20 days) and for completing an investigation (180 days).

D. Stronger Link Between Equity Plan Goals and ConPlan and PHA Plan

We support and welcome the proposed rule's clearer, more specific and direct requirement that a program participant "incorporate" its Equity Plan's fair housing goals, strategies, and actions, as well as fund allocations, in its Consolidated Plan (ConPlan), Annual Action Plan, or PHA Plan. As drafted, these "incorporation" provisions will better ensure that a program participant's programs, activities, and services, the HUD and other federal, state, and local funds allocated to them, as well as its policies and practices, are consistent with the obligation to affirmatively furthering fair housing.

Areas of Support:

- The references at §5.156(a),(b), and (c) regarding use of funds available to a program participant, references such as: "It is the Department's policy to ensure that program funding is used to eliminate disparities…;" and "identify specific expected allocation of funding by program year for the use of HUD and other funds to implement each fair housing goal;" and "This incorporation shall include the allocation of resources necessary for achievement of the goal." Without such direction from HUD, a program participant could incorporate goals, strategies, and actions in words only – words that paint a false impression that it intends to affirmatively further fair housing; however, without appropriate and meaningful allocation of funds, those words can be empty rhetoric.
- The inclusion of disaster plans in the list of program planning documents into which a program participant must incorporate implementation of its Equity Plan fair housing goals and commitments [§5.156(a)].

- The provision at (d) requiring program participants to incorporate the fair housing goals of an Equity Plan into planning documents required in connection with receipt of federal financial assistance from any other federal executive department or agency.

Recommendations:

- Disaster plans should be added at three more places referring to incorporation of an Equity Plan's fair housing goals: the definition of "Fair Housing Strategies and Actions," §5.154(c)(2) "Content of Equity Plan," and §5.164(d) for any revised Equity Plan fair housing goals.
- The final rule should explicitly include Qualified Allocation Plans (QAPs) because the definition of "publicly supported housing" includes housing financed with Low Income Housing Tax Credits (LIHTCs), because the LIHTC program is the federal government's largest program for creating and preserving housing for lower-income households, and because the Fair Housing Act's AFFH mandate includes all federal agencies involved with housing and community development activities.
- The final rule should consistently include "other plans relating to education, transportation, infrastructure, and environment and climate related plans" as listed at §5.154(c)(2) and the definition of "Fair Housing Strategies and Actions." This amendment would entail adding those types of plans at §5.156(a) and (c), §5.164(d), and the definition of "Equity Plan" (perhaps indirectly by simple reference §5.156).

E. Annual Evaluation of Progress Toward Achieving Fair Housing Goals

We support and welcome the proposed rule's requirement that program participants annually conduct and submit to HUD for review and posting on the HUD website, an Annual Progress Evaluation regarding the status of each fair housing goal [§5.154(a)(6), (i)&(j)].

Areas of Support:

- The proposed rule's community engagement provision pertaining to the Annual Progress Evaluation: program participants must engage the public at least annually through at least two public meetings, one of which must take place in an area in which underserved communities predominately live.
- Beyond the annual evaluation, as program participants develop a new Equity Plan every five years, the proposed rule requires the new Equity Plan to include a summary of a program participant's progress in meeting its fair housing goals set in the prior-year Equity Plan, helping to ensure longer-term AFFH goal achievement.

Recommendations:

- We suggest the regulation add that the two required meetings not only be held at different locations, but at different times to increase the opportunity to participate.
- Although the Annual Progress Evaluation must be sent to HUD and posted on the HUD-maintained website, the regulation must also clearly instruct program participants to also post their Annual Progress Evaluations on an easily located webpage on the program participant's website.
- While the Annual Progress Evaluation is an excellent tool for the public to attempt to keep a program participant accountable, we urge the final rule to provide for the public to

directly raise concerns with HUD regarding a submitted Annual Progress Evaluation. Communications between HUD and a program participant regarding a reviewed Annual Progress Evaluation should be posted on HUD's website.

F. Clarification and Emphasis on the Need for a Balanced Approach

We welcome and support the text of the proposed rule providing a detailed definition of "balanced approach" to affirmatively furthering fair housing, as well as references at three additional places in the proposed rule regarding fair housing goals.

Areas of Support:

- A balanced approach, according to the proposed rule, means an approach to community planning and investment that balances a variety of actions to eliminate housing-related disparities using a combination of place-based and mobility actions and investments. This is a major improvement over the 2015 rule, which did not clearly convey that affirmatively furthering fair housing could legitimately entail preserving affordable housing in areas of racially and/or ethnically concentrated poverty if residents of those areas chose to remain in those areas and if a program participant also made substantial investments designed to improve community living conditions and community assets in those disinvested neighborhoods.

Recommendations:

- A minor yet important addition to the example of place-based strategies: "For example, place-based strategies include actions and investment to substantially improve living conditions and community assets in high-poverty neighborhoods while preventing displacement of protected class people and while preserving existing affordable housing stock to meet the needs of underserved communities and address inequitable access to affordable rental and homeownership opportunities." There are two provisions in the proposed rule that should be rebalanced because the examples provided only address resident mobility and access to well-resourced communities. Specifically: §5.154 "The Equity Plan," (g) "Fair Housing Goals," paragraph (2) states that fair housing goals, when taken together, must be designed and reasonably expected to result in material positive change and be consistent with a balanced approach. However, the following list of examples does not include any place-based examples.
- The definition of "Meaningful Actions" at §5.152 does not include the term "balanced approach" and it too suffers from the same, unbalanced, list of examples lacking any place-based options.

II. CONCERNS REGARDING PROVISIONS THROUGHOUT §5.158

Although we commend HUD for proposing vastly enhanced community engagement provisions, we have very serious concerns regarding a number of provisions throughout §5.158. Our concerns are highlighted below.

- The AFFH proposed rule does not specifically call for a program participant to consult with key public and private organizations that can provide valuable initial information regarding fair housing issues and priorities. The AFFH rule should echo the ConPlan consultation regulation structure [at 91.100 and 110] requiring such consultation before engaging in more direct community engagement activities. The AFFH rule should specifically require consultation with FHIPs and FHAPs, other public and private fair housing organizations, legal services, and organizations that represent protected class members (such disability rights groups, domestic violence and sexual assault organizations, linguistically and culturally specific organizations, LGBTQI+ organizations, and environmental justice organizations).
- Because many advocates have experienced rote, proforma public engagement in the ConPlan and PHA Plan processes over the years, we urge HUD to add for emphasis, a qualifier such as "genuine," "complete," or "thorough and well-informed" when defining "meaningful" community engagement.
- It is crucial to have community engagement very early in the process – prior to developing an Equity Plan while there is a blank slate, before a program participant offers its own suggestions implying those suggestions are the ones for a community to react to. A precent for community engagement prior to developing a plan exists in the Consolidated Plan (ConPlan) process; the CHAS statute and ConPlan regulations require a public hearing about housing and community development needs before a proposed ConPlan is even drafted.
- We urge HUD to add at that community engagement must take place regarding the prioritization of fair housing issues [as required at §5.154(a)(2) and (f)(2)] prior to setting fair housing goals. Without a separate community engagement process to inform priority setting, a program participant could go through the motions of "listening" to and even listing all of the many fair housing issues raised by the community, but then dismiss or ignore them when deciding which of the many issues to prioritize.
- "During the development of an Equity Plan" entails one more step after public engagement informing the establishment of fair housing goals – drafting an Equity Plan to submit to HUD for review. Unless there is another opportunity for community engagement about a draft Equity Plan, much of the preceding community engagement could be for naught. The public must have an opportunity to comment on a draft Equity Plan before it is submitted to HUD for review.
- HUD proposes to allow program participants to combine the AFFH §5.158 community engagement provisions with the ConPlan's "citizen" participation requirements or the PHA Plan resident and public participation requirements. If such a combination is chosen, the proposed text requires program participants to explain the Fair Housing Act's affirmatively furthering fair housing duty and ensure engagement regarding that the Equity Plan meets all the criteria set forth in §5.158. The AFFH community engagement provisions are simply incompatible with the ConPlan and PHA Plan public participation provisions. We are very concerned about allowing such combinations and strongly urge

HUD to eliminate all provisions allowing them. The AFFH community engagement requirements must be separate from and in addition to the ConPlan citizen participation provisions and the PHA Plan resident and public participation provisions.

- In accordance with [ConPlan and PHA Plan] program regulations, the public must have a "reasonable opportunity" for involvement in the "incorporation" of fair housing goals as strategies and meaningful actions into the ConPlan, Annual Action Plan, PHA Plan, and other required planning documents. The term "reasonable opportunity" is too ambiguous; it does not equate to a more specific community engagement requirement such as holding a meeting.
- The proposed rule requires program participants to use communication methods designed to reach the broadest possible audience, and "*should"* make efforts to reach members of protected class groups and underserved communities. To maximize reaching the broadest possible audience, we recommend the final rule provide as examples, providing notification of the availability of documents, public meetings, and other community engagement activities through publications, websites, blogs, neighborhood newsletters, and radio stations oriented to protected class populations and underserved communities.
- Program participants must actively engage a wide variety of diverse perspectives within their communities and use available information in a manner that promotes setting meaningful fair housing goals that will lead to material positive change.
- The text should provide examples of "a wide variety of diverse perspectives," as the proposed rule does for other provisions (e.g., the definitions of "underserved communities" and "protected characteristics.") We suggest a non-exhaustive list to include community-based organizations that are trusted by the people they serve: immigrant-serving organizations, groups serving people with limited English proficiency, disability rights organizations and providers of services to people with disabilities, LBGTQI+ groups, entities providing services to gender violence survivors and/or advocacy organizations addressing gender violence, and groups representing formerly incarcerated and justice-involved people.
- All aspects of community engagement must be conducted in compliance with fair housing and civil rights requirements, including Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, and the Americans with Disabilities Act. In order to make this provision clearer and "reader-friendly" to those who do not know exactly what Title VI, Section 504, and ADA entail, the final rule should first spell out the protected classes the provisions are meant to serve and in what ways. In other words, the text should make the typical references to disabilities and the various means needed to be considered in order to facilitate engagement with a particular form of disability. Similarly, the text should explicitly refer to limited English proficiency and ways to ensure maximum participation throughout all community engagement touch points.

III. CONCERNS REGARDING PROPOSED CHANGES TO THE CONPLAN CITIZEN PARTICIPATION REGS

- HUD must amend the provisions at §91.105(e)(1)(i) and (ii) so that they are consistent and address the intent to incorporate the Equity Plan's fair housing goals, strategies, and actions in the ConPlan.

- The AFFH community engagement requirements must be separate from and in addition to the ConPlan citizen participation regulations and the PHA Plan resident and public participation requirements.
- The community engagement for purposes of developing an Equity Plan must allow for sufficient opportunity for the community to have the in-depth discussions about fair housing "issues" required by §5.158.

IV. CONCERNS REGARDING PROPOSED CHANGES TO THE PHA PLAN RESIDENT PARTICIPATION REGS

- As remarked above regarding the ConPlan provisions, we are very concerned about allowing such combinations and strongly urge HUD to eliminate all provisions allowing them.
- The AFFH regulation's community engagement provisions should only be added to, not merged with, the PHA Plan resident/public participation provisions.
- As stated previously, it is crucial to have community engagement very early in the process – prior to developing an Equity Plan while there is a blank slate, before a program participant offers its own suggestions implying those suggestions are the ones for a community to react to.
- We recommend four stages of community engagement, one for identifying fair housing issues, one for setting fair housing priorities, and one for deciding on fair housing goals, strategies, and actions, along with a fourth separate community engagement meeting pertaining to a draft Equity Plan before it is sent to HUD for review.
- We recommend that the regulation (or subregulatory guidance) include as an acceptable meeting format, hybrid meetings that allow virtual engagement as long as there is concurrent in-person engagement. Participating virtually may enable more protected class and underserved community persons to engage, those who: have childcare or eldercare responsibilities, have a disability that makes attending in-person meetings difficult, lack affordable or reliable transportation, or have other barriers to in-person participation.

V. WAYS TO STRENGTHEN THE EQUITY PLAN

A. Affordable Housing Opportunities

- There is no definition of "affordable" (it should be Brooke rents), and aside from public housing and voucher-assisted units, a resident in HUD-assisted housing could be "cost-burdened." In addition, there is inadequate direction regarding "at various income levels."
- To meaningfully enable a picture of "affordable housing opportunities," a program participant needs to assess the extent to which households are cost-burdened and severe cost-burdened by income category (ELI, VLI, and Low/Mod) for each type of federally assisted housing, especially the LIHTC program, in a program participant's geographic area of analysis.

B. Stronger Accessibility Guidelines
Throughout the HUD AFFH Rule and Request for Comments document, federal laws which prohibit discrimination against people with disabilities are cited: the American with Disabilities Act, the Fair Housing Act, Section 504 of the Rehabilitation Act to name a few. However, given that the AFFH Rule will require HUD and those entities receiving all types of federal housing funding to communicate across the broad spectrum of people living in their jurisdictions and communities, there is little specificity to the needs of people with communications disabilities and how that communication will take place.

The types of communications that are needed by a range of people with disabilities and communities with disabilities are broad and directly tied with their disabling conditions. The federal government, state governments, housing authorities, landlords, and others involved in developing, constructing, and providing housing units have failed to provide reasonable accommodations in communications for those who need it to have equal access to their housing programs, housing units, and fair housing enforcement activities.

There are recent additional federal and state laws which are attempting to bring federal and state websites and digital communications into alignment with providing equal access to communications for people with disabilities and to make the information, forms, documents, etc. readily available to all. One of these laws is the 21st Century Integrated Digital Experience Act passed in 2018 and being implemented by every federal agency is failing to provide equal access to those with communications disabilities. Both Section 504 and Section 508 of the Rehabilitation Act require the written communications from the federal and other government agencies to be in formats which are accessible to people with communications disabilities. Any format or formats the person with disabilities needs is supposed to be provided by the agency if requested. However, this is not happening at the federal, state, or local level of government nor with landlords, and other providers of housing programs and housing units. The protections for nondiscrimination against people with communications disabilities are not being enforced. HUD itself is causing more harm because it refuses to provide accessible effective communications on its website or in its forms and other communications.

- The AFFH Rule should be very specific – as in many Public Housing Agencies' Administrative Plans where they state they will provide reasonable accommodations including communications in Braille, by tape or recording, or large print materials for those with vision or reading disabilities including the blind. Currently, there are more formats that are available to people with vision disabilities in the form of screen reader software and digital Braille.

- Accessible documents and websites mean that the information put onto a website or a form must be created so that a person with vision or reading disabilities and the blind will be able to access the materials effectively and be able to use them. Unfortunately, nowhere in the Rule is this specifically delineated.

  In fact, local, state, and federal agency personnel have taken the position since the 21st Century IDEA Act was passed and in some states state laws as well, that whatever is available on the websites is automatically accessible. Therefore, they do not "have to"

provide the digital and hard copy or audio formats which may be requested through reasonable accommodations, because it's already available in what they believe is an accessible format online. The AFFH Rule and compliance efforts should incorporate more specificity regarding what would be acceptable and enforceable compliance with nondiscrimination in providing accessible effective communications for people with vision and reading disabilities and the blind. If you have no way to communicate with nor to understand the communications or forms, etc., being provided, then you do not have equal access to the housing programs, housing units, or fair housing enforcement efforts.

- The same can be said regarding those with hearing disabilities, the deaf, and the deaf-blind. In every way, it can be woefully insufficient to have only a TTY machine or captioning Call telephone access for people with hearing disabilities. There are many who are deaf whose first and primary language is sign language. Yet there is no mention of the regular provision of sign language interpreters for meetings with clients, for public meetings, or for any other announcements or communications with the public. Far too often access to agencies, webinars, key meetings, and direct communications with officials is limited because the need for sign language interpreters is considered extra or not essential.

  It is left up to the deaf person or community who needs sign language to let the agency or official know ahead of time – sometimes up to ten days prior to the event or appointment for any sign language interpreter to be provided. Instead, there should be sign language fluent officials and interpreters at every housing authority, local, state, and government offices. Whenever there is a public meeting sign language interpreters should be automatically provided with seating reserved near the interpreter for those who require his or her services. In addition, the interpreter should be able to be seen by any person with hearing disabilities who is attending the meeting virtually.

- It is suggested that when an entity is required to post announcements or their policies or Equity Plan, etc., online, that it also be posted on a YouTube channel, because people who do not have direct access to the internet may have access to YouTube on their television. A YouTube video could provide sign language interpreters as well as closed captioning for those with communications disabilities. In addition, there are ways that entities can pay for sign language video services to assist when an in-person interpreter is not available.

- And for both those with vision difficulties and hearing difficulties, real time captioning whether online or in person can greatly assist with comprehension and participation in the public meeting. Far too often, both in telephone, online meetings, or even webinars the captioning is done by a computer program or by someone who knows nothing at all about the topic at hand. This causes there to be terribly inaccurate captioning, especially if there are a lot of specialized terms being used by the officials or presenters. For example, there was a zoom meeting where the online automatic captioning kept saying one participant's name was the swear word "f-ck" which caused embarrassment all around.

- If a person with communications disabilities needs reasonable accommodations to receive accessible digital and/or hard copy documents and other written materials. These should be made available to them automatically. Officials should know there are no exceptions to providing these types of equal access to their programs.

  It should be noted that many officials believe if they just scan a document or form, it is "digital". However, if the form is scanned in without making it a searchable pdf, then it is being scanned in as a photograph of the page and there is no actual text in the file. This means that screen readers have no text to read aloud. It's a blank page. Same with forms or documents created on a computer – if you type in a line by pressing the underscore key a number of times, a person will see a line. However, a screen reader will read out "underscore, underscore, underscore…" If there is an image of a check off box on the page, then it might not be seen by the screen reader. An accessible digital form has to have coding in it that will make the lines to fill out and check off boxes so that the person with vision and reading disabilities and the blind can have equal access to the materials that others do. If you don't have equal access to communications, then you are being denied equal access to housing programs, housing units, and fair housing enforcement.

- The AFFH Rule needs to be specific or federal, state, and local officials and agencies as well as landlords, developers, etc., will continue to deny people with communications disabilities equal access to housing.

- The AFFH Rule also needs to be more specific about other types of reasonable accommodations for people with disabilities because far too often federal, state, and local governments and other providers of housing services, housing units, and fair housing enforcement ignore or deny such reasonable accommodations. For example, many housing units are being labeled as "accessible" but they are not accessible – as in fully usable – for many people with disabilities. There has been many years since the HUD "accessibility" requirements for construction, building, developing, funding, and providing "accessible" housing units were defined. The ADA, which many believe provides the details of the accessibility requirements for all buildings, excludes residential units. It covers the outside buildings, grounds, and common areas, but not the inside of the actual apartments or condos. Single family housing is also excluded. And far too often entities building residential housing look to the minimum number of units to make "accessible". This leads to many people and families with disabilities becoming homeless or to living in housing units without the accessibility features they need.

  The incredible shortage of fully wheelchair or otherwise accessible housing units means that those with housing subsidies often cannot lease up within in the time limits mandated by HUD. Even brand-new buildings and complexes are not being constructed to be fully wheelchair or otherwise accessible for those with disabilities.

- HUD needs to update the federal requirements and definition of an accessible housing unit. And HUD and the AFFH Rule need to ensure that a significant increase in the numbers of fully accessible housing units for low-income tenants and homebuyers are made available in proportions which will meet the needs of the communities they are

serving. Examples of "adaptable" housing units – which coincide with HUD's "accessible" housing unit definitions – can have the following key areas inside the apartment that the person in a wheelchair cannot use: windows, bathrooms with tub showers, inaccessible appliances, emergency exits (or lack thereof if the emergency exit is supposed to be through a window), etc.
An apartment should only be called accessible if it is truly usable by a person with disabilities. People without disabilities can find ways to make do – and even complain about- with accessibility features in "adaptable" or "accessible" housing units. This often happens, because landlords, property management companies, etc., do not want to have people with disabilities in even the "adaptable" or "accessible" housing units. So, they let able-bodied tenants rent those units instead of people or families with disabilities.

- The AFFH Rule should require housing authorities, states and local governments to document the types of accessibility features – if any- in the housing units being occupied by those they are serving. And they should have to document if the persons living in said unit need any of the accessibility features of that housing unit. Sometimes this is only done by Public Housing Authorities who own their own public housing units. Other Housing Authorities, who do not own public housing units, have seen this information as optional. It's part of HUD forms for them to fill out, but they do not do so. It should be mandatory for this information to be reported by all those governed by the AFFH Rule. Otherwise, there can be no measurement of the number of housing units with accessibility features that the person or families with disabilities require. How can a housing authority measure improvement in this area, if there is no data to begin with?

- The AFFH Rule should include the requirement that every housing complex being built has to be visitable. For example, in some brand new LIHTC housing complexes, while one can wheel from the parking lot to their apartment, to the office, and to the dumpster, the person with disabilities cannot wheel up to the front door of their neighbors. This is because the State and local government officials approved a design which included a step up to some of the apartment front doors. There was no problem with terrain which caused the step to be installed, it was merely the preferred housing design of the LIHTC developer, so the State LIHTC program and the local authorities approved it.

- The AFFH Rule should be clear that for both housing that is being built exclusively for people with disabilities and the frail elderly and for housing as part of integrated housing complexes (for both those with and without disabilities), the amenities in the apartments should be equivalent. Especially in this day where we just went through a pandemic, in no way should those developers creating LIHTC or other housing for the people with disabilities or the frail elderly have fewer amenities than those built for the general public.

  For example, many such "special needs" complexes do not provide accessible washers and dryers in the individual housing units while those built for the general public include laundry machines in each apartment. This means that people without disabilities can put their wash right in the machine in the comfort of their own home, while those with disabilities who physically have a much more difficult time doing their laundry have to

carry it to a centralized laundry room where there are often inaccessible laundry machines. And in the case of the pandemic, they are then possibly exposed to people with COVID or other contagious diseases, when people with disabilities often are more susceptible to catching them. People with disabilities and the frail elderly should have accessible laundry machines in their homes. Their other appliances should also be accessible to them as well.

- For people who have vision disabilities and blindness, there should be accessibility features which allow them to be able to use their appliances. All digital appliances can be extremely difficult or impossible for them to use. Refrigerators should be accessible, in general it means there should not be a freezer on top, because a person in a wheelchair can't reach the freezer controls and can have heavy frozen things fall on their head trying to reach anything inside it. Yet, because these types of refrigerators are the least expensive, these are the ones most often installed in even "special needs" complexes.

  In effect, the AFFH Rule should help end the physical discrimination against people with physical disabilities by ensuring that the equity plans include regulations which make significantly more housing units fully wheelchair and otherwise accessible for people with disabilities.

- Due to limitations in the Fair Housing Act, there are physical and financial barriers for people with disabilities and the frail elderly who need reasonable modifications of existing housing units. The Fair Housing Act requires landlords and property management companies to approve necessary reasonable modification requests, but landlords will do whatever they can to prevent persons with disabilities who need accessibility features from renting. If they do succeed in renting, they will then do what they can to deny reasonable modifications can be done. Federal, state, and local officials should be aware of the requirements to allow reasonable modifications and ensure that landlords and property managers comply. The AFFH rule should ensure that data is kept on reasonable modifications as well as reasonable accommodation requests.

- The Fair Housing Act says that the person or families with disabilities must pay for the reasonable modifications AND must pay to undo the reasonable modifications if the landlord so desires. The AFFH Rule should have the federal, state, and local authorities ensure that for any developers, landlords, property management companies receiving the benefit of federal funds – including for LIHTC properties – are not permitted to require reasonable modifications to be removed should the person or family with disabilities move out of the unit. This helps remove discrimination and inequity of the physical barriers for people with disabilities to have a home they can use.

- The AFFH rule should require all federal, state, and local housing trust funds to provide funding for reasonable modifications for any housing unit in their jurisdiction which received any federal or governmental housing funding. There should be ways where a person or family with disabilities can apply directly to the housing trust fund available in their jurisdiction so that reasonable modifications necessary for them to have equal access to the housing unit is funded by the housing trust fund. Otherwise, the financial barrier to

paying for reasonable modifications is too much for most people with disabilities and the frail elderly to overcome. This means they must live in housing units which do not meet their accessibility needs and can be dangerous for them. In addition, this would alleviate the horrendous cost of paying to undo accessibility features that other people with disabilities and the frail elderly are seeking and cannot find. No other protected class faces such physical and financial barriers just to try to have a safe and usable place to live.

- It is also important for the AFFH Rule to ensure that the data collected and reported by the housing authority and other entities required to comply is analyzed not just by "disabled" or "elderly" or race or ethnic group – but that those of us who are in more than one protected class are also counted. For example, many on the NLIHC Tenant Leader Cohort are women, people of color, with varying ethnic backgrounds, ages, and disabling conditions. The data never shows how race or ethnicity or age or gender and disability intersect. This fails to capture key elements of equity and counting who is being housed. It matters because the more protected classes you are a part of, the more likely you are going to be discriminated against in your housing choices.

  The AFFH Rule should ensure these data are collected and analyzed. It is important to know if those who live in special needs complexes or in senior citizen complexes are only those who are of the predominant racial group in the surrounding community or if there is a mix of racial ethnic groups showing equal access to the special needs or senior citizen complex or community.

- Far too often special needs and senior citizen complexes are not built close to the services and community amenities they need. They are sometimes built away from shopping, transportation, health care facilities, pharmacies, jobs, and community activities that the tenants need.

- Far too often special needs and senior citizen complexes only include efficiency or one-bedroom units. Seldom are there two-bedroom units. And rarely are there housing units with three or more bedrooms. This is discriminatory because it forces people with disabilities to live alone, because the only units available are so small. It is also discriminatory because people and families with disabilities of different racial and ethnic groups can't find housing units, because there are none that are large enough for their family size or to include a live-in aide or to have a room for their medical equipment. There needs to be options for multigenerational housing with universal design and accessibility features.

  The AFFH should consider these needs, because due to the pandemic it is very difficult to get outside assistance in the form of home health aides or personal assistants. The pay is terrible and there are usually no benefits for the caregivers from the federal or state or local programs or from the insurance companies or Medicaid. If there were larger units, then more people with disabilities could have housing where they share with others with disabilities, with their extended family members, or with members of their "family of choice", or with a live-in aide.

This would also be good for those in the LGBTQIA2S+ community who have disabilities or who are frail elderly and who need at home assistance. Often these tenants are not seen as related to each other and therefore discriminated against when wanting to live together or wanting to share with others in the LGBTQIA2s+ community.

- It is important that the AFFH Rule look at federal, state, or local affordable housing rules which do not allow for reasonable accommodations for persons or families with disabilities who need more bedrooms than family members. In some states, there are affordable housing regulations which discriminate against people with disabilities and the frail elderly and those with Section 8 vouchers – because the regulations do not specifically tell those providing the housing units that they must allow reasonable accommodations for more bedrooms than members in the family and that they must accept Section 8 vouchers for rent or for homeownership if the unit is for purchase.

  Literally, the application processes on websites or on hardcopy applications determine the size unit you can apply for by the number of people in the household. It has nothing to do with how many bedrooms the household needs. For example, a two-parent family with one child automatically qualifies to apply for a three-bedroom apartment, while a two person household with disabilities only qualifies for up to a two bedroom household. This means that the family might have one more bedroom they don't need, but the family with disabilities would be without a bedroom for their live-in aide or for their medical equipment.

  The same can be said about housing authorities and affordable housing programs who decide that a two-person family with two adults of the same gender must live in a one-bedroom unit. There must be reasonable accommodations made for those in such circumstances who need separate bedrooms due to their disabling conditions. Often, housing authorities fail to have reasonable accommodation policies, practices, and procedures and, if they do have these, they fail to follow them. More must be done in the AFFH Rule and in the Equity evaluation to ensure that the housing authorities grant reasonable accommodations for accessible communications, for different sized housing units, for payment exception standards for accessible housing units, etc. Far too often those officials responsible for ensuring that the Section 504, ADA, Fair Housing Act policies are complied with do the opposite and ignore or deny reasonable accommodations outright.

- Housing authorities, state and government officials, landlords, property management companies, etc., need to provide documentation of reasonable accommodation requests received, any interactive process negotiated, and the result of an approval or denial of the reasonable accommodation request. There must be grievance procedures and the tenants or applicants need to be told their rights to due process and how to appeal the decision. Far too often all of this is ignored by those in highest authority. The AFFH needs to find ways to ensure compliance so that the disability discrimination stops.

- There needs to be consideration of the indoor and outdoor environmental impact on all households, but especially those with special needs families and the frail elderly. Far too often these units are built in environmentally hazardous locations (next to a superfund site, next to an active quarry complete with regular earthshaking explosions, next to chemical plants, or wetlands, etc.) which adversely affect the health and quality of living for the residents.

- Far too often the complexes are constructed without consideration for basic tenets of building safety. For example, a complex built without regard to the storm water runoff which goes underneath the building and erodes the foundation. Over time water vapor intrusion occurs and toxic mold spores and overly humid conditions exist in the apartments causing the residents to become ill and their belongings to be ruined. A complex built with shoddy materials that are not maintained so that roof leaks lead to water in the walls and mold and ceiling collapse. Buildings where the foundation and walls were not properly sealed so that insects and vermin find their way into the apartments.

  For some of these complexes, it's not just shoddy construction or failure to ensure that the local environmental conditions will be safe for the buildings and the residents, it's that they don't even follow the building plans submitted to the state and local authorities. None of the authorities do anything to put them into compliance, which puts new buildings and tenants in hazardous conditions soon after occupancy when the affordable buildings are supposed to last for decades to come.

  The AFFH and the Equity plan has got to take this into account somehow. Far too many households wind up with residents becoming sick and having nowhere else to move to. And the local and state authorities ignore this outcome. It is not enough for authorities to just build housing; they must build safe housing for those who live in it. And there should never be a "self-certification" of habitability or of "good construction job" by the developer or the owner, because far too often this certification is wrong. The same should be said of the Equity Plan and any self-certification of following said plan. There must be outside compliance review and enforcement efforts to ensure actual progress is being made toward equity and equal opportunity in housing.

- Persons and families with disabilities are often excluded from rental housing due to their disabling conditions, but there is even more discrimination when it comes to homeownership programs. Often persons and families with disabilities are completely excluded from housing authority's homeownership programs. The housing counseling financial and purchasing education programs often provide no information at all that is useful for those with disabilities who need wheelchair or otherwise accessible housing. They do not tell households being counseled where to find accessible housing, how to find accessible housing, how to find funding for modifying an existing house, how to use a Section 8 homeownership voucher to purchase a home, what programs might assist them in building an accessible home, etc.

- The opportunities for people and families with disabilities to own an accessible home which meets their needs are even fewer than for those who rent. In addition, for those who have environmental illness and multiple chemical sensitivity – conditions which have been recognized by HUD since at least 1992 – there are no options whatsoever. There is a growing need for this type of housing where the person or family with disabilities or the frail elderly who experienced environmental exposures can have control over their own home environment. It's time that the AFFH rule and policies took the needs of these most vulnerable persons and families with disabilities into account and sees to it that they have options for safe housing where they can heal and flourish.

- People with disabilities and the frail elderly are counting on HUD to increase the numbers and types of units of accessible and available housing to meet the varying needs of this diverse population and to ensure that no one gets left out in the cold because the authorities want to keep us out of sight and invisible to the world. Most of this section on disability discrimination has focused on the physical disabilities of people with disabilities and the frail elderly. It should be noted that persons with sensory disabilities, developmental disabilities, mental health, emotional health, cognitive injury, persons with PTSD, and dementia all face disability discrimination in housing as well. The enforcement of the AFFH Rule must include provisions to ensure that there is housing provided for these individuals and families. Some of these people and families with disabilities are extremely likely to become homeless during their lifetime.

C. Assessment of Environmental Impacts on Protected Groups

- Add a requirement to describe and assess a program participant's housing and community development policies and activities that have environmental justice impacts for protected class groups. For example, correcting past practices leading to harmful environmental burdens, such as industrial zoning practices, highway development, lax brownfield cleanup.

D. Collection of Robust Data

- There are a number of data/information questions that are important to address in order to conduct a fair housing analysis relevant for PHAs. We suggest HUD add the following in the final rule:

  For both Public Housing and HCV programs:
  - Racial demographics and household size of eligible families in a housing market compared with households receiving assistance and households on a waitlist, by program;
  - Total number of assisted housing units by census tract (including PHA properties and vouchers, plus LIHTC, PBRA, and any state housing programs);
  - Number of accessible units in a market area (including a PHA's portfolio) and types of accessibility features available (mobility features, sensory features, etc.);
  - Percentage of limited English proficient families served by a PHA, compared with the broader service area;
  - Number of requests for reasonable accommodations, including approvals and denials;

- Number of admissions denials for each program, broken down by race, sex, primary language, and disability, and categorized by reason;
- Number of evictions or subsidy terminations for each program, broken down by race, sex, primary language, and disability, and categorized by reason.

For HCV Program:
- Availability/percentage of units accessible to persons with disabilities in a market area; availability of funds for modifications;
- Portability in/out data (including numbers of requests and denials, as well as basis for denial), by protected class;
- Number of requests for exception payment standards and percentage granted, by protected class;
- Search times and extensions by race, household size, and disability;
- Success rates by race/family size/disability;
- Current payment standards in relation to Small Area FMRs;
- Estimate of the number of available units in low-poverty neighborhoods with and without exception payment standards based on SAFMR.

For Project-Based Vouchers:
- Occupancy and application data for project-based vouchers;
- Number of PBVs by census tract, including tract poverty concentration and racial demographic data.

For Public Housing:
- Property conditions (REAC or NSPIRE scores) by neighborhood, including number of units near contaminated sites, how many units near public infrastructure, how many units near public transportation, etc.;
- Number of Violence Against Women Act emergency transfers requested, granted, and denied;
- Data on housing overcrowding by protected class;
- Lead-based paint abatements and remediations.

E. Cleary Explained PHA-controlled Policies

- We suggest the final rule be revised to add the following PHA-controlled policies (some of which include a policy in the draft rule but more clearly explained):

For both Public Housing and HCV programs:
- Admission preferences;
- Admission screening policies, including: criminal records policy, screening for prior landlord-tenant history and references (including nonpayment of unaffordable rents and evictions), screening for negative credit history and prior debts owed to the PHA;
- Waitlist policy limited to first-come/first-served or other policies that disadvantage certain protected class members such as people with disabilities;
- Lack of language access;
- Inadequate reasonable accommodations policies;

- Emergency transfers including but not limited to emergency Violence Against Women Act (VAWA) transfers;
- Description of any efforts to increase access when the admissions process has moved online, by addressing language access, unequal access to the Internet, and the needs of older adults;
- Lack of strong affirmative marketing efforts.

For the HCV program:

- Payment standards too low to reach lower poverty neighborhoods (lack of exception payment standards or SAFMR);
- Reasonable rent determinations (i.e., are reasonable rent determinations resulting in overpayment of landlords in softer markets and underpayment of landlords in higher-demand markets?);
- No or insufficient mobility counseling;
- Porting barriers and/or lack of information on porting to tenants;
- Landlord or unit listings predominantly in high poverty neighborhoods (e.g. online listing services);
- Residency preferences;
- HCV search times and policy on extensions;
- Excessively long inspection times and delays in approving RFTAs;

For Public Housing:

- Unreasonable house rules and whether enforcement disproportionately impacts protected class residents;
- Policies to address harassment based on a protected class (sexual harassment, harassment based on race, national origin, disability, etc.) by staff or other tenants;
- Failure to comply with VAWA, and lack of partnership with DV/SA organizations;
- Repositioning policy and impact on existing residents of RAD conversion, Section 18 demolition or disposition, and Section 22 voluntary conversion – especially regarding ability to return, location of replacement housing, and ability to successfully use a voucher.
- Security or police presence within public housing;
- Guest policies.

F. Subregulatory Guidance

- We suggest that subregulatory guidance address the following:

For both Public Housing and HCV programs:

- Include a strong affirmative marketing program with language access for multiple languages used in client population;
- Incorporate fair housing goals into the Section 8 Admin Plan and ACOP;
- Develop partnerships with community organizations providing services to marginalized communities (specifically targeting populations underrepresented in programs due to historic discrimination and lack of language access), including schools, community health centers, victim service providers, legal aid organizations, etc.;

- Support independent-tenant groups representing all public housing properties and voucher families.

For HCV program:

- Adopt housing a mobility program (counseling, search assistance, and landlord recruitment) with trained staff who have demonstrated success in creating and operationalizing housing mobility;
- Remove financial barriers to moves (assistance with security deposit and moving expenses and utility deposits in high opportunity areas); offer holding payments to landlords for units in high opportunity areas;
- Partner with legal aid and fair housing agencies in support of source of income discrimination cases.

G. Extended Timeframe to Review Equity Plan

- The 60-day timeframe for submitting comments should start when HUD posts the submitted Equity Plan, not when it is submitted to HUD. The public might not be aware that a program participant has submitted an Equity Plan for several days if HUD does not post it immediately. HUD does not have a good track record for posting important items in a timely fashion.
- Require a program participant to post a "submitted" Equity Plan on an easy to locate webpage on its own website.
- To facilitate awareness and to afford the public with as much opportunity as possible to submit comments to HUD, on the day an Equity Plan is submitted to HUD, the program participant must notify via electronic means (including to all who have submitted input or comments regarding fair housing issues, priorities, goals, and any "draft" Equity Plan), that an Equity Plan was submitted and that the public may submit comments to HUD.

H. Revising an Accepted Equity Plan

- Based on the advice of the Disaster Housing Recovery Coalition (DHRC) coordinated by NLIHC, we urge the final rule to require a program participant to submit a revised Equity Plan as soon as possible after a Stafford Act Declaration is made. It is crucial to have a revised Equity Plan ready to go in order to ensure AFFH principles are applied to planning associated with disaster-related funding.
- The final rule should contain language stating that a "material change" revision is required when substantial, one-time infusions of federal funds are provided. Recent examples of such infusions are the ARPA State and Local Fiscal Recovery Funds and the Infrastructure Improvement Act.

I. Strengthening Definitions

- **"Affordable Housing Opportunities":** A major problem with the proposed rule is that it does not define "affordable" while using the word "affordable" not only in this definition, but throughout the proposed rule. We strongly urge HUD to define "affordable" housing

as housing that requires a household to spend no more than 30% of their adjusted income on housing expenses (rent or mortgage) and utilities – the Brooke Rule.

With the exception of public housing, Housing Choice Vouchers, and Project-Based Section Eight programs, other HUD programs and the Treasury Department's Low Income Housing Tax Credit (LIHTC) do not use Brooke rents; rather they rely on a fixed number based on 30% x a fixed, program-specific AMI-related number – not a resident's actual, adjusted income. Consequently, many HUD- and LIHTC-assisted households might be cost-burdened, spending more than 30% of their adjusted income on rent and utilities, and in some instances being "severely cost burdened," spending more than half of their adjusted income for rent and utilities. Therefore, merely identifying housing as "affordable" because it is HUD- or LIHTC-assisted can be a major exaggeration, greatly undermining the meaning of the term "affordable housing opportunity."

We are also concerned that some program participants could conflate "affordable" housing with "fair housing." We recommend adding language at the beginning of the definition of "affordable housing opportunities" stating that the provisions in the definition are based on the Fair Housing Act's protected classes.

- **"Basic Habitability Requirements":** Using the generic "basic habitability requirements" should be augmented to specifically cite HUD-assisted housing requirements. The reference in paragraph (2) is too easily overlooked. The final rule should read, Housing that meets Housing Quality Standards (HQS) regulations for the Housing Choice Voucher program and the NSPIRE regulations for other HUD programs (or any future modifications or substitutions for those programs), and that meets state or local habitability requirements for housing not assisted with a federal program. Basic habitability standards for HUD-assisted housing also includes full compliance with all lead-based hazards, carbon monoxide, radon, and environmental quality regulations.

- **"Equity Plan":** The last sentence, "The Equity Plan includes program participants' submission of annual progress evaluations, which will be published on HUD maintained webpages," even in context could be interpreted to mean that only Annual Progress Evaluations will be published on HUD-maintained webpages. However, elsewhere in the proposed rule, the text clearly states that an Equity Plan submitted for HUD review, an "accepted" Equity Plan, and relevant communications between HUD and a program participant must also be posted to a HUD-maintained website.

- **"Geographic Area, Geographic Area of Analysis, or Area":** Due to the placement of a comma, the definition for local governments can be misinterpreted to give a program participant the option to only analyze fair housing issues in its jurisdiction. We suggest a slight modification to prevent such misinterpretation: "For local governments, the expected geographic area of analysis includes the whole jurisdiction of the local government pursuant to 24 CFR 91.5 *and the CBSA it is part of*, and where necessary…"

- **"Meaningful Actions":** The definition only offers examples of one part of the equation for a "balanced approach" to affirmatively furthering fair housing – such as decreasing

disparities in access to opportunity in the program participant's jurisdiction. If HUD is serious about seeking a balanced approach, it must include several examples of place-based activities such as preserving existing affordable housing in racially or ethnically areas of concentrated poverty.

- **"Protected Characteristics":** We welcome the proposed rule's addition of a refinement of protected classes. In particular, we support the examples provided in the definition that include individuals experiencing homelessness, Lesbian, Gay, Bisexual, Transgender, Queer, + persons (LGBTQ+), survivors of domestic violence, and persons with criminal records. We suggest the final rule slightly revise LGBTQ+ to read LGBTQI+, adding Intersex. This would be consistent with Executive Order 14075.

  HUD has long recognized that pregnancy discrimination occurs in housing. Pregnancy may be sex discrimination and/or familial status discrimination. Because the proposed rule definition of protected characteristics refines "sex" in parenthesis, we urge HUD to add "pregnancy" because some might not otherwise consider pregnancy subject to the Fair Housing Act, under either the sex or familial status protected classes.

- **"Racially or Ethnically Concentrated Areas of Poverty, (R/ECAPs)":** We urge HUD to improve the quantitative definition of R/ECAPs that it issues in sub-regulatory guidance. We suggest, a R/ECAP be a geographic area based on census tracts with a poverty rate of at least 30% (not 40%) and a total percentage of minority persons within the geographic area at least 20 percentage points (not 50) higher than the total percentage of minorities in a housing market area as a whole. We also urge the R/ECAP definition be described in a short, simple sub-regulatory guidance document, as well as in more detailed and comprehensive sub-regulatory guidance (such as the "Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T) Data Documentation") because locating the R/ECAP definition in the latter was not readily apparent to many advocates.

- **"Underserved Communities":** We endorse the inclusion of survivors of domestic violence as one example of an underserved community. We suggest specifically including sexual assault survivors. We also urge HUD to remove from the definition "low-income communities or neighborhoods" and "rural communities" because they are not inherently comprised of people in the Fair Housing Act's protected classes.

- **"Significant":** Throughout the definition portion of the proposed rule, the term "significant disparities" is used, and elsewhere in the operational portion of the rule "significant concentrations" is used when asking jurisdictions and PHAs about segregation. We understand it is not possible to assign quantitative definitions of "significant," especially in regulation; however, we urge HUD to develop sub-regulatory guidance to help program participants give serious consideration to assessing "significant" disparities and concentrations.

The proposed rule is a critically important step towards addressing structural racism and achieving greater racial equity and justice. Strengthening and enforcing protections under Affirmatively Furthering Fair Housing is vitally important to addressing the broader housing crisis. Affordable, stable, and accessible housing and robust housing choice are the foundation upon which just and equitable communities are built, but too often, the power imbalance between renters and landlords puts renters at greater risk of housing instability, harassment, and homelessness, and it fuels racial inequity.

Thank you for your efforts to expand and strengthen renter protections. As the administration continues this vital work, we urge you to continue to engage with tenant leaders to ensure that those most impacted can help develop and design policy solutions to protect and empower renters.

We appreciate the opportunity to provide comments on Affirmatively Furthering Fair Housing– to discuss needed protections for renters and to provide direct feedback on policies that impact our lives and communities.

If you have any questions or need additional information, please feel free to contact NLIHC Senior Vice President for Racial Equity, Diversity and Inclusion Renee Willis at rwillis@nlihc.org or NLIHC Senior Advisor Ed Gramlich at egramlich@nlihc.org.

Sincerely,

Loraine Brown
President Emeritus, 334 East 92nd Street Tenant Association
Board Member, National Low Income Housing Coalition
Resident, New York, NY

Geraldine Collins
Executive Director, National Alliance of HUD Tenants
Board Member, National Low Income Housing Coalition
Resident, New York, NY

Kafi Dixon
Founder, Common Good Cooperative
Resident, Boston, MA

Willie "J.R." Fleming
Executive Director, Chicago Anti Eviction Campaign, NFP
Resident, Chicago, IL

Bambie Hayes-Brown
President and CEO, Georgia Advancing Communities Together, Inc.
Board Member, National Low Income Housing Coalition
Resident, Atlanta, GA

Jerry Johnson
Housing Choice Voucher Leader Board Member, Chicago Area Fair Housing Alliance (CAFHA)
Resident, Chicago, IL

Joy Johnson
Founder and Chair, Charlottesville Public Housing Association of Residents
Former Board Member, National Low Income Housing Coalition
Resident, Charlottesville, VA

Rachel Johnson
Member, Faces of HUD Housing
Executive Director and Co-Founder, H.O.M.E.R
Organizer, Florida Rising
Resident, Fort Lauderdale, FL

Zella Knight
Member Leader, Residents United Network Los Angeles
Board Member, National Low Income Housing Coalition
Resident, Los Angeles, CA

Rebekah Love
Resident, Louisville, KY

Laura Ramos
President, Everyone for Accessible Community Housing Rolls! Inc.
Resident, Clinton, NJ

Hasson Rashid
Board Member, National Low Income Housing Coalition
Resident, Cambridge, MA

Shalonda Rivers
Member, NAACP Miami Dade Branch
Board Member, National Low Income Housing Coalition
Resident, Opa Locka, FL

Linda Soderstrom
Board Member, Metropolitan Interfaith Council on Affordable Housing (MICAH)
Resident, St. Charles, MN

Mindy Woods
Member Leader, Resident Action Project
Board Member, National Low Income Housing Coalition
Resident, Seattle, WA