

Date: September 28, 2017

To: The Honorable Ben Carson
Secretary, Department of Housing and Urban Development (HUD)
451 7th Street SW, Washington, DC 20410

From: Hurricane Housing Recovery Coalition C/O National Low Income Housing Coalition
1000 Vermont Avenue NW, Suite 500, Washington, DC 20005

To Secretary Carson:

We, the undersigned 514 organizations and local governments, write as part of a Hurricane Housing Recovery Coalition to express our commitment to ensuring that federal housing recovery and rebuilding efforts are complete and equitable for all individuals and communities impacted by the devastation caused by Hurricanes Harvey, Irma and Maria. We represent national, state, and local organizations, including many working directly with impacted communities in Texas, Florida, Louisiana, Georgia, Puerto Rico and the Virgin Islands and with first-hand experience recovering after prior disasters. As you work to administer federal disaster relief, we urge you to make certain that federal disaster recovery resources reach all impacted households, including those with the lowest incomes who are often the hardest-hit by disasters and have the fewest resources to recover afterwards.

While the road ahead for recovery after Hurricanes Harvey, Irma and Maria will take many years, there are a number of steps HUD can take now to jumpstart the recovery and assist low income households and communities.

Our recommendations (enclosed) include:

- Providing oversight to ensure that disaster recovery resources are used to address the full breadth of housing needs for the homeowners, renters, and people experiencing homelessness prior to the disaster;
- Providing housing assistance at a sufficient level to allow individuals to access safe, quality, affordable and accessible housing in locations where they can reconnect with family and community;
- Ensuring that the civil rights of survivors are protected efforts;
- Ensuring that housing, infrastructure, and economic development recovery efforts reach everyone in need and mitigate – rather than worsen – housing segregation;
- Preserving public housing resources and protect residents of public housing; and
- Expanding contracting and employment opportunities to disaster survivors by encouraging recovery efforts to employ local, low income residents to the greatest extent possible.

Thank you for your attention and consideration of these recommendations. Members of the Hurricane Housing Recovery Coalition will follow up soon to discuss these recommendations in more detail.

Sincerely,

National Organizations

American Baptist Home Mission Societies
Autistic Self Advocacy Network
B'nai B'rith International
Catholic Charities USA
Center for American Progress
Center for Community Change
Center for Popular Democracy
Center on Budget and Policy Priorities
Chemung County Housing Coalition
Children's Health Watch
Coalition on Human Needs
Congregation of Our Lady of Charity of the Good Shepherd, US Provinces
Consortium For Citizens With Disabilities Housing Task Force
Consumer Action
Corporation for Supportive Housing
Council For Health & Human Service Ministries, United Church Of Christ
Demand Progress
Elevate Energy
Elliott & Sugarman
Enterprise Community Partners
Equal Rights Center
Evangelical Lutheran Church In America
Evangelical Lutheran Good Samaritan Society
Feeding America
Fundors Together To End Homelessness
Grounded Solutions Network
Habitat For Humanity International
Holy Spirit Missionary Sisters, USA-JPIC
HomeFree-USA
Housing Advisory Group
Housing Assistance Council
Housing Partnership Network
Housing Up
Islamic Society Of North America
Lawyers Committee for Civil Rights Under Law
LeadingAge
Local Initiatives Support Corporation
LOCUS: Responsible Real Estate Developers And Investors
Low Income Investment Funds
Lutheran Services in America Disability Network

Make Room
Mercy Housing, Inc.
Mercy Loan Fund
Michigan Historic Preservation Network
NAACP
NAACP Legal Defense and Educational Fund, Inc.
NASTAD
National Advocacy, Center of the Sisters of the Good Shepherd
National Affordable Housing Management Association
National AIDS Housing Coalition
National Alliance Of Community Economic Development Associations
National Alliance of HUD Tenants
National Alliance on Mental Illness
National Alliance to End Homelessness
National Association For County Community And Economic Development
National Association for Latino Community Asset Builders
National Association of Affordable Housing Lenders
National Association of Local Housing Finance Agencies
National Association of Neighborhoods
National Association of the Deaf
National CAPACD
National Center for Healthy Housing
National Center For Transgender Equality
National Church Residences
National Coalition for the Homeless
National Community Development Association
National Community Reinvestment Coalition
National Community Stabilization Trust
National Congress for Community Economic Development
National Consumer Law Center
National Council of Jewish Women
National Council On Independent Living
National Development Council
National Disability Rights Network
National Domestic Violence Hotline
National Fair Housing Alliance
National Health Care For The Homeless Council
National Housing & Rehabilitation Association
National Housing Conference
National Housing Institute
National Housing Law Project
National Housing Resource Center
National Housing Trust

National Housing Trust - Enterprise Preservation Corporation
National Law Center on Homelessness & Poverty
National Leased Housing Association
National LGBTQ Task Force Action Fund
National Low Income Housing Coalition
National Low Income Housing Policy Center
National Network to End Domestic Violence
National Urban League
Neighborworks Capital
NETWORK Lobby for Catholic Social Justice
Oxfam America
Pathstone Corporation
Policylink
Portlight Inclusive Disaster Strategies
Poverty & Race Research Action Council
Presbyterian Church (U.S.A.) Office of Public Witness
Preservation Of Affordable Housing, Inc.
Prosperity Now
Provincial Council Clerics of St. Viator
Rebuilding Together
Right To The City Alliance
Rural Community Assistance Corporation
Sargent Shriver National Center on Poverty Law
Smart Growth America
Stewards Of Affordable Housing For The Future
Technical Assistance Collaborative
The Arc of the United States
The Jewish Federations Of North America
The NHP Foundation
The Sharing Community, Inc.
Universal Living Wage
Volunteers Of America
Xaverian Brothers

Florida Organizations and Local Governments

Affordable Homeownership Foundation, Inc.
Alachua Habitat For Humanity
Beautiful Safe Beginnings
Bonita Bestcs
Catalyst Miami
Central Florida Community Action Agency
Centro De Ayuda Hispana DbA American Help Center

City of Pompano Beach, Florida
Collier Resource Center, Inc.
Community Redevelopment Associates of Florida, Inc.
De Hostos Senior Center, Inc.
Dr. Arthur Boyer Foundation, Inc.
First Community Christian Pentecostal Church of God
Florida Alliance for Assistance Services and Technology
Florida Alliance of Community Development Corporations, Inc.
Florida Asian Services Center
Florida Housing Coalition
Florida Southwestern State
Florida Student Power Network
Good Neighbor Society
Grace And Truth Community Development Corporation
H.O.M.E.S., Inc.
Habitat For Humanity of Hardee
Habitat For Humanity Of Pinellas City
Hallisky & Davis
Housing Authority of the City of Fort Myers
Housing Opportunities Project for Excellence, Inc.
Indian Horizon Of Florida
Jacksonville Area Legal Aid, Inc.
Jessie Ball Dupont Fund
Lakeland Habitat For Humanity
Latino Leadership, Inc.
Lee County Development Corporation
Lee County Homeless Coalition
Meals on Wheels South Florida
Metro North Community Development Corporation
Miami Homes For All
NANAY Community Economic Development Corporation
New Florida Majority
New Horizons Of The Treasure Coast
New Smyrna Beach Housing Authority
Organize Florida
Pahokee Housing Authority
Personal Growth Center
Pro Source Real Estate And Property Service
Rebuilding Together Miami-Dade
Religious Of The Sacred Heart Of Mary
South Florida Board of Realtists
South Florida Community Development Coalition
St. Johns Housing

St. Petersburg Neighborhood Housing Services, Inc.
Tallahassee Housing Authority
Tayan Alliances Inc
The Farmworker Association of Florida, Inc.
United Way South Sarasota County
Wealth Watchers Inc.
Winter Haven Housing Authority
Youth and Family Alternatives, Inc.

Texas Organizations and Local Governments

Accessible Housing Austin!
Accessible Housing Resources, Inc.
Advocacy Outreach
Atlantic Housing Foundation, Inc.
Austin Community Design & Development Center
Austin Habitat for Humanity
Austin Housing Coalition
Austin Tenants Council
Career and Recovery Resources
Center For Transforming Lives
City of Amarillo, Texas
City of Beaumont, Texas
City of Galveston, Texas
City of Garland, Texas
City of McAllen, Texas
City of Pasadena, Texas
City of Plano, Texas
Coalition For The Homeless of Houston/Harris County
County of Hidalgo, Texas
Covenant Community Capital
Del Rio Housing Authority
Dental Health Arlington
Greater Houston Fair Housing Center
Guadalupe Neighborhood Development Corporation
House the Homeless Inc.
Houston Center For Independent Living
Houston Housing Authority
I Am Pleased Development Center
La Union Del Pueblo Entero
Meals On Wheels of Tarrant County
Meals on Wheels Texas
Mid-Coast Family Services

NAMI - Abilene
 Neighborworks Laredo
 North Texas Fair Housing Center
 Project LIFT
 Proyecto Azteca
 RAISE Texas
 Rebekah Baines Johnson Center
 San Antonio Coalition For Veterans And Families
 Texas Affiliation of Affordable Housing Providers
 Texas Appleseed
 Texas Association of Community Development Corporations
 Texas Homeless Network
 Texas Housers
 Texas Tenants' Union
 True Casa Consulting LLC
 Volunteers of America- Texas
 Waco Community Development
 Waco Housing Authority

Other State Organizations and Local Governments

Center for Fair Housing	Alabama
Central Alabama Fair Housing Center	Alabama
City of Florence	Alabama
Community Service Programs of West Alabama, Inc.	Alabama
Fair Housing Center of Northern Alabama	Alabama
Alaska Community Development Corporation	Alaska
Sitka Community Land Trust	Alaska
Ability360	Arizona
Southwest Fair Housing Council	Arizona
Arizona Housing Coalition	Arkansas
Association of Programs for Rural Independent Living	Arkansas
City of Fort Smith	Arkansas
Housing Authority of Star City	Arkansas
Abode Communities	California
Age Well Senior Services, Inc.	California
Asian Pacific Institute on Gender-Based Violence	California
California Homeless Youth Project	California
CarsonWatch	California
Colchester Creek	California
Disability Rights Education & Defense Fund	California
EAH Housing	California

Fair Housing Advocates of Northern California	California
Fair Housing Council of Orange County	California
Fair Housing Council of Riverside County, Inc.	California
Fair Housing Council of the San Fernando Valley	California
Greater Napa Valley Fair Housing Center	California
Housing Rights Center	California
Inland Fair Housing and Mediation Board	California
Oakland Tenants Union	California
Orange County United Way	California
Project Sentinel	California
Sacramento Regional Coalition to End Homelessness	California
US Vets Homeless Feeding & Housing Services	California
Voces Verdes	California
Western Center on Law and Poverty	California
American Planning Association, Colorado Chapter	Colorado
Colorado Coalition For The Homeless	Colorado
Community Restoration Partners, LLC	Colorado
Denver Metro Fair Housing Center	Colorado
Denver Relief Consulting	Colorado
Habitat for Humanity of Pueblo	Colorado
Spector and Associates	Colorado
Connecticut Fair Housing Center	Connecticut
Connecticut Housing Coalition	Connecticut
Connecticut Legal Rights Project	Connecticut
Housing Development Fund	Connecticut
DC Coalition Against Domestic Violence	DC
North Capitol at Plymouth/Retirement Housing Foundation	DC
Better Homes of Seaford, Inc.	Delaware
HerStory Ensemble	Delaware
Housing Opportunities of Northern Delaware, Inc.	Delaware
Community Outreach Training Center, Inc.	Georgia
Fuller Center for Housing	Georgia
Georgia Advancing Communities Together	Georgia
Georgia Coalition Against Domestic Violence	Georgia
JCVision and Associates, Inc.	Georgia
Metro Atlanta Task Force for the Homeless, Inc.	Georgia
Metro Fair Housing Services, Inc.	Georgia
Our Fine Arts, Inc.	Georgia
Poz Military Veterans USA	Georgia
Savannah-Chatham County Fair Housing Council, Inc.	Georgia
Standup For Kids	Georgia
The CHOW Project	Hawaii
City of Nampa, Idaho	Idaho

Intermountain Fair Housing Council	Idaho
Living Independence Network Corporation	Idaho
South Central Community Action Partnership	Idaho
Access Living of Metropolitan Chicago	Illinois
Aurora Housing Authority	Illinois
Chicago Area Fair Housing Alliance	Illinois
CK and Associates	Illinois
Hispanic Housing Development Corporation	Illinois
HOPE Fair Housing Center	Illinois
Housing Action Illinois	Illinois
Housing Choice Partners	Illinois
Latin United Community Housing Association	Illinois
Open Communities	Illinois
Park Ridge Housing Initiative	Illinois
South Suburban Housing Center	Illinois
The Resurrection Project	Illinois
Valerie S. Kretchmer Associates, Inc.	Illinois
Bridges to Leadership, Inc.	Indiana
Fair Housing Center of Central Indiana	Indiana
God's Helping Hand	Indiana
Habitat for Humanity of Elkhart County	Indiana
Lake County, IN Department of Community Economic Development	Indiana
Unified Government of Wyandotte County/Kansas City	Kansas
First World Architects Studio	Kentucky
Stephanie Sweeney & Associates, LLC	Kentucky
Blueprints Consulting	Louisiana
EXP Realty LLC	Louisiana
GL Realty Group LLC	Louisiana
Greater New Orleans Fair Housing Action Center	Louisiana
Greater New Orleans Housing Alliance	Louisiana
Lower 9th Ward Homeownership Association	Louisiana
Mental Health America of Louisiana	Louisiana
Providence Community Housing	Louisiana
Re/Max First	Louisiana
Avesta Housing	Maine
Coastal Enterprises, Inc.	Maine
Freeport Housing Trust	Maine
Maine Affordable Housing Coalition	Maine
Advocacy and Training Center	Maryland
African American Health Alliance	Maryland
Alabaster	Maryland
Asian-American Homeownership Counseling, Inc.	Maryland

Baltimore Neighborhoods, Inc.	Maryland
Coalition Homes, Inc.	Maryland
Du & Associates, Inc.	Maryland
Maryland Affordable Housing Coalition	Maryland
Montgomery Housing Partnership	Maryland
Partnership for Inclusive Disaster Strategies	Maryland
Racial and Ethnic Health Disparities Coalition	Maryland
Swift, Thomas & Kemp Development Group, Inc.	Maryland
The Cave Institute	Maryland
Birch Island Real Estate Consulting LLC	Massachusetts
CohnReznick	Massachusetts
Corcoran Jennison Management LLC	Massachusetts
Homes for Families	Massachusetts
Massachusetts Fair Housing Center	Massachusetts
Massachusetts YouthBuild Coalition	Massachusetts
Montgomery County Coalition for the Homeless	Massachusetts
Natural Hazard Mitigation Association	Massachusetts
RoundStone Group	Massachusetts
The North Shore Moving Market	Massachusetts
Uniting Citizens for Affordable Housing in Newton	Massachusetts
Financial Justice Coalition	Michigan
Habitat for Humanity Northeast Michigan	Michigan
Michigan Community Reinvestment Coalition	Michigan
Michigan State University - College of Law - Housing Law Clinic	Michigan
Casa de Esperanza: National Latin@ Network for Healthy Families and Communities	Minnesota
Integrated Community Solutions, Inc.	Minnesota
Metropolitan Fair Housing Council of Oklahoma, Inc.	Minnesota
Metropolitan Interfaith Council on Affordable Housing	Minnesota
Minnesota Housing Partnership	Minnesota
Our Spring Lake Store LLC	Minnesota
Better Family Life, Inc.	Missouri
Empower Missouri	Missouri
Greater KC Housing Information Center	Missouri
ADAPT Montana	Montana
Friend Housing Authority	Nebraska
Sisters of Mercy West Midwest Justice Team	Nebraska
ACTIONN	Nevada
Advocates for Peace and Social Justice	New Jersey
Consumer Credit and Budget Counseling, Inc.	New Jersey
Fair Share Housing Center of New Jersey	New Jersey
Housing Community Development Network of New Jersey	New Jersey

Jersey City Office of Community Development	New Jersey
Monarch Housing Associates	New Jersey
New Jersey Association on Correction	New Jersey
New Jersey Tenants Organization	New Jersey
New Mexico Coalition To End Homelessness	New Mexico
Ali Forney Center	New York
Alliance Against Homeless of Bergen County, Inc.	New York
Alternatives Federal Credit Union	New York
Arbor Housing And Development	New York
ARC Foundation, Inc.	New York
Carroll Gardens Association	New York
Center For New York City Neighborhoods	New York
Central Oklahoma Commercial Association of REALTORS	New York
Central Park Gardens Tenants' Association	New York
Chhaya Community Development Corporation	New York
CLUSTER Community Services	New York
CNY Fair Housing	New York
Coalition for the Homeless	New York
Columba Kavanagh House, Inc.	New York
Community Access	New York
Community Development Futures, LLC	New York
Community League of the Heights	New York
Community Solutions	New York
Continuum of Care, Mount Vernon New York	New York
Coordinated Care Services, Inc.	New York
Disabled in Action of Greater Syracuse Inc.	New York
Empire Justice Center	New York
Fair Housing Justice Center, Inc.	New York
Flatbush Development Corporation	New York
Fordham Bedford Housing Corporation	New York
Geel Community Services, Inc.	New York
Good Shepherd Services	New York
Habitat for Humanity New York City	New York
Habitat for Humanity of Tompkins & Cortland Counties	New York
Hellenic American Neighborhood Action Committee	New York
Housing Help, Inc.	New York
Hudson River Housing, Inc.	New York
Human Development Services of Westchester	New York
Independent Living Center of the Hudson Vallie, Inc.	New York
Lantern Community Services	New York
Local Initiatives Support Corporation- New York City	New York
Long Island Housing Services, Inc.	New York
Make the Road New York	New York

Mohawk Valley Housing and Homeless Coalition	New York
Morningside Heights Multi-Cultural Tenants Organization	New York
NAACP Mid-Manhattan Branch	New York
Neighborhood Housing Services of Jamaica, Inc.	New York
Neighborhood Preservation Coalition of New York State, Inc.	New York
New York Association on Independent Living	New York
New York Housing Conference	New York
New York State Homes and Community Renewal	New York
New York State Rural Advocates, Inc.	New York
New York State Tenants & Neighbors Coalition	New York
Newburgh Housing Authority	New York
Northeast Hawley Development Association, Inc.	New York
Program Design and Development LLC	New York
Project Hospitality	New York
Public Housing Communities, Inc.	New York
Rensselaer County Housing Resources	New York
Rensselaer Housing Authority	New York
Resource Center for Independent Living, Inc.	New York
RUPCO	New York
Rural Housing Opportunities Corporation	New York
Rutgers Resident Council	New York
South Country Community Land Trust	New York
Southern Tier Independence Center	New York
Southside United HDFC	New York
Southside United Housing Development Corporation	New York
Supportive Housing Network Of New York	New York
The Guidance Center of Westchester	New York
The Housing Council at PathStone, Inc.	New York
Troy Rehabilitation and Improvement Program	New York
Westgate Tenants Association @ Stonehenge Village	New York
YWCA of Rochester and Monroe County	New York
YWCA of Syracuse and Onondaga County, Inc.	New York
YWCA of the Greater Capital Region	New York
Financial Pathways of the Piedmont	North Carolina
Housing Authority of the City of High Point	North Carolina
North Carolina Housing Coalition	North Carolina
Wilson Area Habitat for Humanity	North Carolina
Minot Area Home Coalition	North Dakota
Affordable Housing Alliance of Central Ohio	Ohio
Barbara Poppe and Associates	Ohio
Central Ohio Fair Housing Association	Ohio
Cleveland Tenants Organization	Ohio
Fair Housing Advocates Association	Ohio

Fair Housing Center of Toledo	Ohio
Fair Housing Resource Center, Inc.	Ohio
Housing Research & Advocacy Center	Ohio
Miami Valley Fair Housing Center, Inc.	Ohio
The Partnership Center	Ohio
YMCA of Columbus	Ohio
Baker Schonchin Holdings Corporation	Oregon
Northwest Consumer Affairs	Oregon
ROSE Community Development	Oregon
Catholic Social Services	Pennsylvania
Housing Equality Center of Pennsylvania	Pennsylvania
Integra Home Counseling, Inc.	Pennsylvania
National Resource Center on Domestic Violence	Pennsylvania
Nazareth Housing Services	Pennsylvania
Pennsylvania Association of Housing & Redevelopment Agencies	Pennsylvania
Scranton Counseling Center	Pennsylvania
Uptown Partners of Pittsburgh	Pennsylvania
HousingWorks RI	Rhode Island
County of Lexington SC Department of Community Development	South Carolina
Development Steps	South Carolina
Erwin Housing Authority	Tennessee
GAP Community Development Resources	Tennessee
New Level Community Development Corporation	Tennessee
Shield, Inc.	Tennessee
Housing Channel	Texas
Crossroads Urban Center	Utah
Salt Lake City County Continuum of Care	Utah
Salt Lake Homeless Coordinating Council	Utah
Utah Housing Coalition	Utah
Housing Vermont	Vermont
Randolph Area Community Development Corporation	Vermont
RuralEdge	Vermont
Vermont Affordable Housing Coalition	Vermont
Community Housing Partners	Virginia
Farmville Area Habitat for Humanity, Inc.	Virginia
Habitat for Humanity Virginia	Virginia
Housing Opportunities Made Equal of Virginia	Virginia
Piedmont Housing Alliance	Virginia
Virginia Housing Alliance	Virginia
Catholic Charities Housing Services	Washington
Fair Housing Center of Washington	Washington

Gethsemane Lutheran Church	Washington
Greenfield Institute	Washington
Homeward Bound Community Land Trust	Washington
OPAL Community Land Trust	Washington
Seattle/King County Coalition on Homelessness	Washington
Washington Low Income Housing Alliance	Washington
Whatcom Skagit Housing	Washington
Central Appalachia Empowerment Zone of West Virginia	West Virginia
Mountain Hospice, Inc.	West Virginia
Affordable Housing Action Alliance	Wisconsin
Commonwealth Development Corporation	Wisconsin
Hirsch Group Architecture	Wisconsin
IndependenceFirst	Wisconsin
Wisconsin Coalition of Independent Living Centers	Wisconsin
Wisconsin Partnership for Housing Development	Wisconsin
Wyoming Coalition for the Homeless	Wyoming

U.S. Department of Housing and Urban Development (HUD) Housing Recovery Policy Recommendations

HUD Should:

1. Provide oversight to ensure that disaster recovery resources are used to address the full breadth of housing needs for the homeowners, renters, and people experiencing homelessness prior to the disaster by:
 - a. Considering providing disaster recovery resources directly to large municipalities (more than 100,000 in population) – in addition to state governments - that have the capacity to manage such funds. This will help avoid bureaucratic delays that inevitably result when there are multiple layers of sub-allocations at the state level. HUD must ensure, however, that compliance with federal fair housing and civil rights laws is a condition of eligibility for these funds.
 - b. Maintaining the requirement that states and communities receiving federal disaster recovery funds submit a rebuilding plan to HUD for approval that includes meaningful opportunities for public comment, including a public hearing;
 - c. Requiring states to demonstrate to HUD that they are adequately addressing the needs of homeowners, renters, and people experiencing homelessness with their CDBG-DR allocation and other resources as a condition for receiving funds. This should be made available to the public.
 - d. Providing CDBG-DR grantees with data on neighborhoods and populations with the greatest unmet housing needs after the disaster and requiring grantees to demonstrate that they are meeting these needs. HUD should make this data publicly available;
 - e. Requiring states to track and report to HUD and make publicly available the completion status of all homeowner and rental units that receive federal recovery assistance;
 - f. Requiring grantees to disaggregate data by race, income, geography, and other factors and to make data transparent and publicly available.
 - g. Requiring states to submit to HUD for its approval performance goals for the recovery of homeownership and rental housing programs, including goals for processing applications, beginning construction, and completion. Performance goals should be made available to the public; and

- h. Providing ongoing technical assistance to state and local governments administering CDBG-DR, to local field office staff that work with grantees, and to CDBG-DR sub-recipients.
- 2. Provide housing assistance at a sufficient level to allow individuals to access safe, quality, affordable and accessible housing in locations where they can reconnect with family and community by:
 - a. Immediately preparing to stand up a Disaster Housing Assistance Program (DHAP) to administer a disaster voucher program (DVP);
 - b. Issuing guidance stating that people who were experiencing homeless at the time of the disaster are eligible for disaster recovery resources;
 - c. Ensuring that individuals experiencing homelessness prior to the disaster have access to the same disaster relief assistance as those who were renting their homes prior to the disaster;
 - d. Clarifying that owners of manufactured housing are eligible for assistance and creating a plan for reaching them;
 - e. Adjusting fair market rents and/or payment standards as needed to ensure that displaced households receiving disaster vouchers can be rehoused quickly;
 - f. Reissuing clarifications to Notice H4-22 provided in a September 9, 2005 memorandum that provided information to owners of federally subsidized housing developments on tracking displaced tenants, waiting list priority, and vacant units;
 - g. Requiring HUD grantees to stop passing or enforcing laws which criminalize people experiencing homelessness for self-sheltering or conducting other life-sustaining behaviors in public places when there are inadequate alternatives;
 - h. Ensuring that homeowners and owners of rental housing developments with federally financed mortgages and loans, including those financed by the Federal Housing Administration, have access to longer mortgage forbearance periods, fair repayment terms, and resources to stabilize properties in the near term;
 - i. Providing immediate operational and capital resources to homelessness and domestic violence emergency shelters and transitional housing programs and facilities, and housing resources to quickly re-house vulnerable families and individuals who have been displaced multiple times;

- j. Basing grant amounts on the cost to replace or repair damaged property rather than property values to help close financing gaps and to protect households that live in neighborhoods where property values are less than the cost of repairs and replacement; and
 - k. Coordinating closely with the Government Sponsored Entities, the Federal Housing Administration, Department of Veterans Affairs, and the Department of Agriculture to establish uniform disaster relief protocols for mortgage servicers.
3. Ensure that the civil rights of survivors are protected by:
- a. Working with state and local governments to ensure that messages about available assistance reach all hard-to-serve populations, including those with limited English proficiency, criminal history, and those who are blind or have impaired vision and who are deaf or hard of hearing. Communications should be accessible, both programmatically and physically, to lower-income and special needs populations and historically underserved communities;
 - b. Requiring all grantees to complete a language assessment within the first 90 days and to submit to HUD for approval to ensure that all communications be made accessible to individuals with limited English proficiency or who are blind, deaf, or hard of hearing. After past disasters, language assessments were completed after critical communications were made.
 - c. Preventing discrimination after disasters by requiring HUD grantees to fund qualified Fair Housing Enforcement Organizations to educate housing providers and households about their fair housing rights and responsibilities, take in, investigate, and resolve complaints of discriminatory practices, and monitor trends in affected markets to proactively identify and stop discriminatory home sale and rental practices.
4. Ensure that housing, infrastructure, and economic development recovery efforts reach everyone in need and mitigate – rather than worsen – housing segregation by:
- a. Providing guidance and technical assistance to state and local agencies planning rebuilding efforts to ensure compliance with their legal obligation to Affirmatively Further Fair Housing and avoid delays;
 - b. Repairing or rebuilding federally subsidized rental housing in a manner that is consistent with HUD’s Affirmatively Furthering Fair Housing guidance to ensure fair housing choice. Investments should be made in a

manner that fosters affordable housing in high-opportunity neighborhoods, preserves existing affordable housing, and directs needed infrastructure improvements to communities in which it is lacking. All investment should be made in a manner that prevents displacement and provides impacted residents with the choice to stay in their existing communities or relocated to other desired locations;

- c. Ensuring that rebuilding plans address the infrastructure needs of all communities fairly, so that communities with inadequate infrastructure before the disaster emerge from the recovery process with an equitable level of infrastructure (roads, bridges, drainage, etc.) that will enable them to better weather future storms;
 - d. Rejecting any proposed recovery plans that fail to put forth a balanced approach of mobility and place-based investment;
 - e. Working with state and local government and local community organizations to conduct robust outreach to landlords in higher opportunity areas to increase housing choice and combat discrimination against displaced, low income individuals;
 - f. Working with state and local governments to conduct robust outreach to absentee and other landlords in distressed communities to incentivize responsible repair and restoration and to ensure compliance with fair housing laws; and
 - g. Adjusting any current AFFH activity, as required by regulation, to ensure that changes resulting from the disaster are accounted for in the AFH submission and are accurately reflected in any updates or revisions to consolidated and Public Housing Authority plans.
5. Preserve public housing resources and protect residents of public housing by:
- a. Developing a plan to track current public housing residents while rebuilding occurs to ensure that they have access to reconstructed units; and
 - b. Preventing excessively restrictive tenant screening provisions that would unfairly prohibit residents from returning to reconstructed public housing units.
6. Expand contracting and employment opportunities to disaster survivors by encouraging recovery efforts to employ local, low income residents to the greatest extent possible by:

- a. Using Section 3 as a tool to address likely labor shortages after disasters. Section 3 was enacted by Congress to ensure that recipients of certain HUD financial assistance, to the greatest extent feasible, provide job training and employment opportunities to low- or very low-income residents and contract opportunities to small businesses in connection with projects and activities in their neighborhoods. HUD should clearly emphasize to public housing agencies and local jurisdictions the importance of carrying out their statutory obligations;
- b. Revising and improving Section 3 to make the program more effective, including eliminating the current “new hire” definition. Instead, a different standard for meeting Section 3 goals should be utilized: for each job category, Section 3 residents should be working at least 30% of the total number of hours worked by all employees in that job category;
- c. Establishing protocols for setting contracting and hiring goals and publicly reporting progress toward those goals;
- d. Working with state and local governments and organizations serving impacted communities to develop community outreach and multilingual marketing of contracting and job opportunities; and
- e. Establishing workforce training and small business technical assistance on securing government contracts.

For More Information, contact Diane Yentel, NLIHC President and CEO (dyentel@nlihc.org) or Sarah Mickelson, NLIHC Public Policy Director (smickelson@nlihc.org).