



March 6, 2018

Office of General Counsel  
Regulations Division  
Department of Housing and Urban Development  
451 7th Street SW, Room 10276  
Washington DC 20410-0500

Re: Docket No. FR-5173-N-15, Affirmatively Furthering Fair Housing: Extension of Deadline for Submission of Assessment of Fair Housing for Consolidated Plan Participants

To Whom It May Concern:

On January 5, 2018, the Department of Housing and Urban Development (HUD) announced that it will extend the deadline for submission of an Assessment of Fair Housing (AFH) to all local government consolidated plan program participants until their next AFH submission deadline that falls after October 31, 2020. We are very concerned about this delay in HUD's implementation of the Affirmatively Furthering Fair Housing (AFFH) rule because it is critical to ensuring that our communities have a path forward and the tools necessary to comply with the Fair Housing Act of 1968.

Our organizations have strongly supported HUD's efforts in implementing the AFFH rule and its ultimate goal of creating greater opportunity so that all Americans have access to decent, safe and affordable housing in strong and healthy communities. In our previous comment letters we have called for a balanced approach to fair housing, one which includes the preservation of affordable housing, the revitalization of distressed communities, and the construction of new affordable housing in high-opportunity areas. This balanced approach will help improve the access of all households to the homes and neighborhoods of their choosing.

We have previously provided comments on how HUD could improve previous drafts of the rule under this same docket number, and will continue to urge HUD to find ways to improve the implementation of AFFH in a way that supports AFFH goals in an appropriate manner. However, we believe that as a nation we must be doing everything we can to ensure equal access to opportunity and that housing equity is central to achieving this goal. It has been 50 years since the Fair Housing Act was enacted as Title III of the Civil Rights Act, yet the impacts of decades of discriminatory policies are still present across the country. We urge HUD to provide the

necessary support and resources to finally implement AFFH and make it a strong and effective tool for achieving the goals of the Fair Housing Act.

The Local Initiatives Support Corporation (LISC) is dedicated to helping community residents transform distressed neighborhoods into healthy and sustainable communities of choice and opportunity — good places to work, do business and raise children. LISC mobilizes corporate, government and philanthropic support to provide local community development organizations with financial, technical and policy resources. We are a national organization with a community focus, with local LISC offices in 31 different cities and partnerships with a network of 84 rural organizations. Our program staff in the cities and the rural areas where we work collaborate actively with local community development groups, to help identify priorities and challenges, and to deliver the most appropriate support to meet local needs whether it's in the area of housing, economic development, education, healthcare, community safety, or building family income and wealth. Since 1980, we have invested \$16.2 billion in communities across the country, which leveraged \$48.5 billion in total development, including 348,000 affordable homes and apartments.

The National Housing Trust (NHT) has been dedicated to preserving and improving affordable rental housing for over 25 years. Using the tools of real estate development, rehabilitation, finance, and policy engagement the Trust has helped save and improve more than 25,000 affordable homes in 41 states, leveraging more than \$1.2 billion in investment for affordable housing. The majority of properties that NHT has preserved have HUD subsidized mortgages or project-based rental assistance. The majority of the residents we assist are persons of color and quite often our work involves working areas of concentrated poverty. In all cases, we are working with residents and tenant leaders to help them stay in their homes if that is their choice.

Stewards of Affordable Housing for the Future (SAHF) is a collaborative of thirteen multistate nonprofit affordable housing providers who are committed to long-term sustainable ownership and continued affordability of multifamily rental properties. Together, SAHF members own and operate housing in 49 states, the District of Columbia, Puerto Rico, and the U.S. Virgin Islands—providing rental homes to more than 135,000 low-income families, seniors and disabled households across the country.

Sincerely,

A handwritten signature in blue ink, appearing to read "Matt Josephs", with a long horizontal flourish extending to the right.

Matt Josephs  
Senior Vice President for Policy  
Local Initiatives Support Corporation

A handwritten signature in dark ink, reading "Ellen Lurie Hoffman". The signature is fluid and cursive, with the first name "Ellen" being the most prominent.

Ellen Lurie Hoffman  
Federal Policy Director  
National Housing Trust

A handwritten signature in dark ink, reading "Andrea Ponsor". The signature is cursive and stylized, with the first name "Andrea" being the most prominent.

Andrea Ponsor  
Executive Vice President for Policy  
Stewards of Affordable Housing for the Future