



September 18, 2013

U.S. Department of Housing and Urban Development
Office of General Counsel, Regulations Division
451 7th Street SW, Room 10276
Washington, D.C. 20410-0500

RE: Docket No. FR-5173-P-01: Affirmatively Furthering Fair Housing

Dēmos stands in support of the recently proposed U.S. Department of Housing and Urban Development (HUD) rule clarifying the duties of government funded entities to Affirmatively Furthering Fair Housing (AFFH). Residential discrimination and segregation obstruct the rights of equal access and opportunity for still too many Americans. HUD's proposal identifies and remedies the processes that perpetuate these injustices. Moreover, the proposal promotes frameworks that encourage the development of diverse communities, by means of reexamining housing infrastructures as they contribute to upward economic mobility amongst underserved individuals and families.

The effects of disparate housing options for minority populations reverberate far beyond matters of housing and the minorities who are most directly affected. Individuals, families, and institutions alike incur the social, economic and civic costs of unequal housing practices. The relationships between residential socio-economic demographics and the overall strength of community resources (e.g., local tax bases, K-12 education quality) can uniquely impact quality-of-life outcomes, particularly for families with children. As one example, Harvard University's Equality of Opportunity Project recently published a study whose findings reinforce the notion that the act of interspersing poor families within mixed-income neighborhoods bodes positively upon the income mobility rates of those areas. A broader perspective shows that highly segregated concentrations of poverty contribute to undesirable outcomes that require considerable resources for redress, including lower rates of educational attainment, and by extension, lower labor market outcomes and higher volumes of crime and victimization.

The newly drafted AFFH rule respond to these issues by clarifying the protocols and assessment tools for demonstrating and assessing local, state and regional compliance to the 1968 Fair Housing Act. It also combines fair housing priorities with current decision-making practices to impact how communities grow and develop, building a foundation by which members from

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historically excluded communities can share an equal voice in the distribution of HUD resources. The short- and long-term potential impacts—including improved programmatic efficiency that facilitates dialogue about fair housing practices and their civil rights implications, more closely addressing the Fair Housing Act's original goals of confronting disproportionate patterns of housing needs, and supporting the development of heterogeneously integrated communities—translate into greater civic and economic benefits for all Americans.

Achieving fair housing policies and practices is a fundamental step toward realizing the American Dream for all. This proposed rule constitutes one of many necessary safeguards to raise institutional accountability amongst housing regimes that in current design encroach upon that ideal. Its implementation will provide the scope and specificity necessary to complete the tasks of promoting equality, inclusion and opportunity, and will demonstrate that commitment to these guiding principles remains steadfast at the HUD.

Sincerely,

Miles Rappaport
President, Dēmos

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