

Appendix A: Statements of Interest and FRAP 29(a)(4)(A) Statements

1. National Housing Law Project

The National Housing Law Project (NHLP) is a nonprofit organization that advances housing justice for poor people and communities, predominantly through technical assistance and training to legal aid attorneys and co-counseling on key litigation. NHLP works with organizers and other advocacy and service organizations to strengthening and enforce tenants' rights, increase housing opportunities for underserved communities, and preserve and expand the nation's supply of safe and affordable homes.

In addition to various other publications and training materials, since 1981 NHLP has published *HUD Housing Programs: Tenants' Rights*. Commonly known as the "Greenbook," this volume—now on its fourth edition and regularly supplemented between editions—is known as the seminal authority on HUD tenants and program participants' rights by tenant advocates and other housing professionals throughout the country.

NHLP also coordinates the Housing Justice Network, a collection of over 1,000 legal services attorneys, advocates, and organizers from around the country. The network has actively shared resources and collaborated on important and complex housing law issues for over 40 years, including through a dynamic listserv, working groups, and a periodic national conference.

NHLP has been specifically involved with the implementation of the Affirmatively Furthering Fair Housing (AFFH) regulation, including by providing training and developing AFFH materials as a subcontracting technical assistance provider for the U.S. Department of Housing and Urban Development (HUD). NHLP has also provided training and technical assistance to members of the Housing Justice Network and other stakeholders regarding

implementation of the AFFH Rule, including in-depth assistance to advocates in San Mateo County, California, who participated in that County's regional Assessment of Fair Housing.

NHLP has no parent corporation or any publicly held corporation that owns 10% or more of its stock

2. National Law Center on Homelessness and Poverty

The National Law Center on Homelessness & Poverty (NLCHP) is a not-for-profit organization based in Washington, DC, established in 1989 to address issues related to homelessness and poverty at the national level. People who are poor and experiencing homelessness frequently lack effective political voice or power. Homelessness is a problem faced disproportionately by African-Americans, even taking income disparities into account. NLCHP advocates to ensure the constitutional and statutory rights of homeless families and individuals are protected and that laws are not selectively enforced against them.

Through policy advocacy, public education, and impact litigation, NLCHP's programs address federal legal questions affecting homeless people and the root causes of homelessness, and advance the immediate and long-term needs of those who are homeless or at risk of becoming homeless. All humans need adequate housing that provides access to opportunity and is affordable. It believes the insights derived from its experiences will assist this Court in understanding the urgent importance of a robust AFFH process to address longstanding inequalities in society.

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3. National Low-Income Housing Coalition

The National Low Income Housing Coalition's (NLIHC) members include state and local affordable housing coalitions, residents of public and assisted housing, nonprofit housing providers, homeless service providers, fair housing organizations, researchers, faith-based organizations, public housing agencies, private developers and property owners, local and state government agencies, and concerned citizens. While our members include the spectrum of housing interests, we do not represent any segment of the housing industry. Rather, we focus on the best interests of people who receive and those who are in need of federal housing assistance, especially extremely low income people and people who are homeless.

NLIHC staff have long been active in seeking a regulation to implement the affirmatively furthering fair housing obligation of the Fair Housing Act. In 1998 and 1999, NLIHC founder, Cushing Dolbeare, and then-President and CEO Sheila Crowley, participated with many other advocacy organizations in discussing, promoting, and seeking to improve proposed enhancements to Consolidated Plan and CDBG regulations intended to result in more accurate and complete Analyses of Impediments to fair housing choice, as well as more meaningful actions by jurisdictions. Current NLIHC staff member Ed Gramlich, also participated in those activities while on staff at the Center for Community Change. Current NLIHC President and CEO, Diane Yentel, worked at length with partners and HUD on the formation of the AFFH rule while Vice President at Enterprise Community Partners.

In 2010 and 2011, NLIHC was visited several times by people contracted by HUD to obtain input regarding interest by HUD to draft AFFH regulations. NLIHC also actively participated in a listening session held by the Assistant Secretary for Fair Housing and Equal Opportunity on July 22, 2009, and followed up with additional written comments. NLIHC also

actively participated in multiple meetings with HUD about a potential AFFH rule. AFFH was the topic of several workshops and plenary sessions at NLIHC's annual conferences.

Through its Memo to Members, listserv to its State Coalition Partners, and a webinar, NLIHC informed its members about the AFFH regulations proposed on July 19, 2013. NLIHC also informed members about multiple proposed Assessment of Fair Housing Assessment Tools. NLIHC submitted comments and encouraged its members to submit comments. NLIHC maintains an AFFH webpage as a resource for members and the general public.

After HUD, in effect suspended the entire AFFH regulation on January 5, 2018, and in response to a post-suspension formal request for comment in the Federal Register, NLIHC conveyed its opposition to HUD's abrupt action. Compelling an estimated 900 of 1,200 local jurisdictions to revert to the demonstrably ineffective AI scheme until 2024 or 2025 was a drastic, unjustified reversal of years of good-faith work by many stakeholders. During the 50th anniversary year of the Fair Housing Act, instead of moving backward, NLIHC stated that HUD should be moving forward by expediting efforts to reduce segregation and foster greater housing opportunity for people in protected classes.

NLIHC has no parent corporation or any publicly held corporation that owns 10% or more of its stock

4. Sargent Shriver National Center on Poverty Law

The Sargent Shriver National Center on Poverty Law provides national leadership to promote justice and improve the lives and opportunities of people with low income. The Shriver Center advances laws and policies, through litigation, legislative and policy advocacy, and administrative reform, to achieve economic, racial, and social justice for our clients, and to dismantle structural racism. The Shriver Center Housing Justice unit regularly challenges those

housing-related policies and practices that discriminate against protected classes by intent or effect and perpetuate residential segregation. The Housing Justice unit uses the former Analysis of Impediments to Fair Housing Choice and the current Assessment of Fair Housing process to advocate for policies and practices that advance equity and integration.

The Shriver Center has no parent corporation or any publicly held corporation that owns 10% or more of its stock

5. National Consumer Law Center

The National Consumer Law Center ("NCLC") is nationally recognized for its expertise in consumer credit issues. For nearly 50 years, NCLC has drawn on this expertise to provide information, legal research, policy analyses, and market insights to federal and state legislatures, administrative agencies, and the courts. NCLC also publishes a twenty-volume Consumer Credit and Sales Legal Practice Series, including Credit Discrimination, (6th Ed. 2013) which examines and applies the ECOA, Fair Housing Act, civil rights statutes, HMDA, Community Reinvestment Act, and state discrimination laws. A major focus of NCLC's work is to increase public awareness of credit discrimination practices perpetrated against protected classes of consumers and to promote equal access to credit. NCLC frequently appears as amicus curiae in consumer law cases before trial and appellate courts throughout the country.

NCLC has no parent corporation or any publicly held corporation that owns 10% or more of its stock

6. National Community Reinvestment Coalition

The National Community Reinvestment Coalition is a nonpartisan, nonprofit coalition of 600 community-based organizations that promote affordable housing, access to basic banking services including credit and savings, job development, and vibrant communities for America's

low- and moderate-income families. NCRC members include community reinvestment organizations, community development corporations, local and state government agencies, faith-based institutions, community organizing and civil rights groups, minority- and women- owned business associations, and social service providers from across the nation. NCRC engages in education and advocacy through research, training, policy development, fair housing and lending enforcement, and securing commitments from financial institutions to invest in community development. NCRC has been an active proponent of HUD's taking meaningful action toward affirmatively furthering fair housing.

NCRC has no parent corporation or any publicly held corporation that owns 10% or more of its stock

7. Paralyzed Veterans of America

Paralyzed Veterans of America (PVA) is a national, Congressionally-chartered veterans service organization headquartered in Washington, DC. PVA's mission is to employ its expertise, developed since its founding in 1946, on behalf of armed forces veterans who have experienced spinal cord injury or dysfunction. PVA seeks to improve the quality of life for veterans and all people with spinal cord injury and dysfunction through its medical services, benefits, legal, sports and recreation, architecture and other programs. PVA advocates for quality health care, for research and education addressing spinal cord injury and dysfunction, for benefits based on its members' military service and for civil rights, accessibility and opportunities that maximize independence for its members and all veterans and non-veterans with disabilities. PVA has almost 20,000 members, all of whom are military veterans living with catastrophic disabilities. To ensure the ability of our members to participate in their

communities, PVA strongly supports the protections available for people with disabilities through the Fair Housing Act.

PVA has no parent corporation or any publicly held corporation that owns 10% or more of its stock

8. Open Communities Alliance

Open Communities Alliance works with an urban-suburban interracial coalition to promote access to opportunity for all people through education, advocacy, research, and partnerships. The organization's work is grounded in the Fair Housing Act's Affirmatively Furthering Fair Housing provision and the suspension of the AFFH regulation's reporting requirement substantially undermines the organization's ability to fulfill its mission.

Open Communities Alliance has no parent corporation or any publicly held corporation that owns 10% or more of its stock

9. National Collaborative for Health Equity

We are a national health equity group that works to advance equity by addressing the root causes of inequity, which include residential segregation and neighborhood poverty concentration. National Collaborative for Health Equity has no parent corporation or any publicly held corporation that owns 10% or more of its stock.

10. Dēmos

Dēmos is a public policy organization working for an America in which all have an equal say in our democracy and an equal chance in our economy. The organization has produced research on housing and wealth disparities, including in the reports *The Asset Value of Whiteness* (2017) and *The Racial Wealth Gap: Why Policy Matters* (2016). With researchers from Brandeis University, Dēmos developed the "Racial Wealth Audit", a tool to measure the

impact of public policy, including housing policy, on disparate wealth accumulation across racial groups. In its recent reports *Everyone's America* (2018) and *Everyone's Economy* (2018), Dēmos has championed policy solutions aimed at investing in affordable housing, increasing rental assistance, and combating residential segregation. Dēmos has called repeatedly for stricter enforcement of fair housing law and therefore has a strong interest in the fate of the AFFH rule. \

Dēmos has no parent corporation or any publicly held corporation that owns 10% or more of its stock

11. Equal Justice Society

The Equal Justice Society (EJS) is transforming the nation's consciousness on race through law, social science, and the arts. A national legal organization focused on restoring constitutional safeguards against discrimination, EJS's goal is to help achieve a society where race is no longer a barrier to opportunity. Specifically, EJS is working to fully restore the constitutional protections of the Fourteenth Amendment and the Equal Protection Clause, which guarantees all citizens receive equal treatment under the law. We use a three-pronged approach to accomplish these goals, combining legal advocacy, outreach and coalition building, and education through effective messaging and communication strategies. Our legal strategy aims to broaden conceptions of present-day discrimination to include unconscious and structural bias by using cognitive science, structural analysis, and real-life experience. EJS has co-authored several amicus briefs and a law review article on implicit bias and housing discrimination.

Equal Justice Society has no parent corporation or any publicly held corporation that owns 10% or more of its stock.

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10. Family Equality Council

The Family Equality Council is a national organization working to ensure equality for the three million LGBT parents in this country and their six million children. Since its founding in 1979, Family Equality Council has worked to change attitudes, laws, and policies through advocacy and public education to ensure that all families, regardless of creation or composition, are respected, loved, and celebrated in all aspects of their life. Given the profound impact that housing discrimination has on low income LGBT families and parents, especially those belonging to communities of color, Family Equality Council has a deep commitment to and interest in ensuring that LGBT families and parents have fair and equal access to housing free from discrimination.

The Family Equaity Council has no parent corporation or any publicly held corporation that owns 10% or more of its stock

11. Charles Hamilton Houston Institute for Race and Justice

The Charles Hamilton Houston Institute for Race and Justice at Harvard Law School was founded in September 2005 by Charles Ogletree, Jr., Jesse Climenko Professor of Law at Harvard Law School. CHHIRJ continues the unfinished work of Charles Hamilton Houston, one of the twentieth century's most talented legal scholars and litigators. Houston helped to engineer the multi-year legal strategy that led to the unanimous decision by the United States Supreme Court in *Brown v. Board of Education*, 347 U.S. 483 (1954). Sadly, he died in 1950, at the age of 54, before he could witness his efforts coming to fruition.

Today, CHHIRJ marshals resources to advance Houston's pursuit of a more equitable and just society. CHHIRJ seeks to address the profound historical and contemporary connections between race, discrimination and unequal access to opportunity. It brings together students,

faculty, practitioners, civil rights and business leaders, community advocates, litigators, and policymakers in a variety of forums, conferences and meetings. CHHIRJ has been focused on, among other things, addressing the many vestiges of government actions, from redlining to active underdevelopment of communities of color during the war on crime and war on drugs. In this regard, the institute has been active in seeking full implementation of the Fair Housing Act, not only in terms of enforcement but the obligation to affirmatively further fair housing. Our Houston/Marshall Plan for Community Justice is anchored on the simple premise that people living in communities affected by public policy must be at the forefront of policy discussions and design, a premise that is implemented in the current rules for community engagement contained in HUD's recently revised rules.

The Charles Hamilton Houston Institute for Race and Justice has no parent corporation or any publicly held corporation that owns 10% or more of its stock.

12. Business and Professional People for the Public Interest

For nearly 50 years, in the context of the *Gautreaux* litigation (e.g. *Hills v Gautreaux*, 425 U.S. 284 (1976)), Business and Professional People for the Public Interest has been engaged with issues of racial segregation in housing. The still ongoing *Gautreaux* case developed "housing mobility" as one response to housing segregation (see, *Crossing the Class and Color Lines: From Public Housing to White Suburbia*, Rubinowitz and Rosenbaum, 2000), and continues today to deal with the consequences of government-imposed housing segregation in the Chicago metropolitan area. A substantial portion of the organization's resources are devoted to grappling with this issue.

Business and Professional People for the Public Interest has no parent corporation or any publicly held corporation that owns 10% or more of its stock

13. Center for Responsible Lending

Center for Responsible Lending (CRL) is a nonprofit, nonpartisan research and policy organization dedicated to protecting homeownership and family wealth by working to eliminate abusive financial practices. CRL is an affiliate of Self-Help, one of the nation's largest nonprofit community development financial institutions. Since 1980, Self-Help has provided over \$7 billion in financing to 131,000 families, individuals, and businesses underserved by traditional financial institutions. Through its credit union network, Self-Help's two credit unions serve over 130,000 people in North Carolina, California, Chicago, Florida, and Wisconsin and offer a full range of financial products and services. CRL's research, policy reports, and recommendations have addressed numerous issues intertwined with the legacy of racial segregation and its impact on housing patterns, specifically racial disparities in mortgage lending even for similarly situated borrowers. Segregated housing patterns and historically unequal access to homeownership opportunities continue to contribute to growing economic inequality and a widening racial wealth gap. CRL's research shows that when people live in communities of opportunity they are more likely to prosper. Conversely, when families live in communities with a history of divestment, they often end up paying more for mortgages and basic financial services.

CRL has a clear interest in reviving the Affirmatively Furthering Fair Housing Rule. The AFFH Rule is a long overdue attempt to address disparities in housing needs, replace segregated living patterns with truly integrated patterns, and foster compliance with civil rights and fair housing laws. But for its suspension, the AFFH Rule would likely reduce the impact of predatory lending and abusive financial practices, including for underserved communities and communities of color. Thus, the rule would alleviate the fair lending and access to credit issues that are at the core of CRL's mission.

The Center for Responsible Lending has no parent corporation or any publicly held corporation that owns 10% or more of its stock.

14. National Coalition for Asian Pacific American Community Development

The National Coalition for Asian Pacific American Community Development (National CAPACD) is a progressive coalition of local organizations that advocate for and organize in low-income AAPI communities and neighborhoods. We strengthen and mobilize our members to build power nationally and further our vision of economic and social justice for all. Collectively the coalition improves the lives of over two-million Asian American and Pacific Islanders (AAPIs) who live in poverty by providing voice, tools, and shared knowledge to drive change. Quality of life and access to opportunities are affected by structural barriers that result in social inequities. Our initiatives are grounded in analysis and strategies that incorporate the impacts of race, class, gender, religion, sexual orientation, and disability.

The National CAPACD has no parent corporation or any publicly held corporation that owns 10% or more of its stock

15. Asian & Pacific Islander American Health Forum

The Asian & Pacific Islander American Health Forum (APIAHF) influences policy, mobilizes communities, and strengthens programs and organizations to improve the health of over 20 million Asian Americans, Native Hawaiians, and Pacific Islanders (AAs and NHPIs). For over 30 years, APIAHF has defended the right to health across all levels of government. Health is impacted by a number of social determinants including where people live, work and play. Housing discrimination limits the ability to live in an environment that is conducive to a person's health as well as long-term and often intergenerational ability to promote economic

security. As such, APIAHF supports rigorous enforcement of civil rights laws and regulation through the Affirmatively Furthering Fair Housing rule.

APIAHF has no parent corporation or any publicly held corporation that owns 10% or more of its stock

16. The Opportunity Agenda

The Opportunity Agenda believes that access to a safe and affordable home near quality schools, transportation, and jobs is basic to the American Dream and to our nation's future. Unequal access to vital community resources results in unequal access to opportunity, and undermines our prosperity and success as a nation. Segregation and racially concentrated poverty conflict with long-established public policy as well as our shared national values for access to opportunity. The AFFH rule is an important step forward in America's pursuit of greater and more equal opportunity for all. It provides a framework that helps decision-makers plan for using their housing and community development resources in a way that ensures fairness and equity for all. This, in turn, helps stem the growing trend of inequality. The Opportunity Agenda strongly opposes any decision on the part of this administration to suspend this important rule.

The Opportunity Agenda has no parent corporation or any publicly held corporation that owns 10% or more of its stock.

19. Grounded Solutions Network.

Grounded Solutions Network's (GSN) mission is to cultivate communities that are equitable, inclusive and rich in opportunity by advancing affordable housing solutions that last for generations. Founded in 2016, GSN connects national and local expertise, bringing together the networks, knowledge and support needed to build inclusive communities. As a nonprofit

member organization, we promote housing solutions that will stay affordable for generations so communities can stabilize and strengthen their foundation, for good.

Our nation's legacy of economically and racially exclusionary policies has resulted in segregated cities and suburbs all across the U.S. The Affirmatively Furthering Fair Housing (AFFH) provision of the Fair Housing Act is specifically designed to correct the government's historic role in advancing such discriminatory policies. The 2015 AFFH rule is essential to achieving the promise and aspirations of the Fair Housing Act. GSN's work has included providing technical assistance on the development of Assessment of Fair Housing documents under the AFFH Rule.

Grounded Solutions Network has no parent corporation or any publicly held corporation that owns 10% or more of its stock.

20. Long Island Housing Services, Inc.: Our mission is the elimination of unlawful housing discrimination and promotion of decent and affordable housing through advocacy and education. The new AFFH regulations provided structure and guidance in meeting their obligations to overcome housing discrimination. Without these regulations municipalities are more likely to continue enforcing policies that perpetuate housing discrimination and frustrate our mission.

Long Island Legal Services, Inc., has no parent corporation or any publicly held corporation that owns 10% or more of its stock.

21. Southwest Fair Housing Council

The Southwest Fair Housing Council's (SWFHC) Opportunity Index project analyzes access to opportunity in Tucson and Phoenix. The indices are represented by maps that have adapted a methodology from the Kirwan Institute. The indices show that Hispanic residents in

Tucson and Phoenix are much more likely than white non-Hispanic residents to live in segregated low opportunity areas. SWFHC has presented the project and its findings throughout Arizona to raise awareness about who does and does not have access to opportunity and educate community leaders, advocates, housing providers, real estate professionals, government officials, and others about the Fair Housing Act mandate to affirmatively further fair housing and the AFFH Rule. The suspension of the AFFH Rule has chilled SWFHC's effort to affirmatively further fair housing by creating confusion about AFFH requirements and uncertainty about how the Rule will be enforced.

Southwest Fair Housing Council has no parent corporation or any publicly held corporation that owns 10% or more of its stock.

22. Arizona Fair Housing Center, Inc.

The Arizona Fair Housing Center, Inc., has existed since 1988 in its mission to enforce the U.S. Fair Housing Act and its amendments. We have conducted extensive testing of rental properties and have collaborated with the U.S. Housing and Urban Development department to investigate cases requiring attention. Our Center has also engaged in education and outreach to our communities in Arizona most impacted by the FHA, and we have done so with Limited English Proficient client communities in mind.

Arizona has become known, regrettably, as one of the most anti-immigrant states along the U.S./Mexico border, and fair housing issues rate high with these newcomers to the state of Arizona. Our staff is able to address the larger portion of this LEP community, Mexican and Mexican Americans, with the help of bilingual-bicultural staff members. In our efforts to continue Affirmatively Furthering Fair Housing, we fear that non-compliance with the AFFH rule will place unnecessary barriers to our assistance to minority and LEP clients.

Arizona Fair Housing Center, Inc., has no parent corporation or any publicly held corporation that owns 10% or more of its stock.

23. North Texas Fair Housing Center

The North Texas Fair Housing Center (NTFHC) began in 2010 and performs housing discrimination case intake and investigation, housing counseling, education and outreach. Located in Dallas, Texas, NTFHC provides direct services to an average of 800 people per year in 12 North Texas counties. Suspension of the AFFH rule, which ensures that local governments take steps to eliminate housing discrimination and segregation in their communities, runs counter to the Fair Housing Act and to the NTFHC's mission and activities.

North Texas Fair Housing Center has no parent corporation or any publicly held corporation that owns 10% or more of its stock

24. Chicago Area Fair Housing Alliance

The Chicago Area Fair Housing Alliance ("CAFHA") is a non-profit consortium of fair housing and advocacy organizations, government agencies, and municipalities committed to the value of fair housing, diversity, and integration. CAFHA works throughout the Chicago region to combat housing discrimination and promote integrated communities of opportunity through education, advocacy, and collaborative action. CAFHA provides fair housing education, training, and technical assistance and convenes coalitions around fair housing policy and advocacy initiatives. CAFHA has also been at the forefront of educating and providing assistance to local jurisdictions on Affirmatively Furthering Fair Housing. CAFHA developed the region's first Fair Housing and Equity Assessment, a predecessor to the Assessment of Fair Housing, and is currently working to promote a regional AFH as a best practice locally.

Chicago Area Fair Housing Alliance has no parent corporation or any publicly held corporation that owns 10% or more of its stock.

25. Austin Tenants Council

Austin Tenants Council is a local non-profit agency that provides education, counseling, mediation, and resources to over 10,000 tenants in the Austin area per year. We are a federally-funded fair housing center, working to fight discrimination and segregation in housing. In the course of that work, we work with thousands of tenants seeking safe, decent, fair, affordable housing. We also publish the Guide of Affordable Housing in the Greater Austin Area, which facilitates tenants finding income-restricted or affordable housing. Austin is fighting a long history of housing segregation and unequal access to opportunity, and has been noted as the most economically segregated metropolitan area in the US.

Our work with tenants indicates that HUD is not fulfilling its basic duty to enforce the Fair Housing Act. The AFFH rule was a means to do so, and HUD has arbitrarily and capriciously delayed that rule, meaning HUD will continue to not enforce fair housing law. This is counter to our mission, which includes ensuring that communities are open to all and free of housing discrimination.

Austin Tenants Council has no parent corporation or any publicly held corporation that owns 10% or more of its stock.

26. California Reinvestment Coalition

California Reinvestment Coalition (CRC) is a nonprofit organization that has been advocating for consumer protection and fair and equal access to credit for all California communities since 1986. CRC builds an inclusive and fair economy that meets the needs of communities of color and low-income communities by ensuring that banks and other

corporations invest and conduct business in our communities in a just and equitable manner. Over its 30 years, the CRC has grown into the largest state community reinvestment coalition in the country with a membership of 300 nonprofit organizations working for the economic vitality of low-income communities and communities of color. CRC member organizations include several fair housing and community organizations devoted to ending discrimination and increasing access to credit for underserved individuals and communities.

California Reinvestment Coalition has no parent corporation or any publicly held corporation that owns 10% or more of its stock.

27. Legal Services NYC

Legal Services NYC ("LSNYC") is the nation's largest provider of free civil legal services to the poor. For 50 years, LSNYC has provided expert legal assistance and advocacy to low-income residents of New York City. Each year, LSNYC's neighborhood offices across New York City serve tens of thousands of New Yorkers, including homeowners, tenants, the disabled, immigrants, the elderly, and children. New York City's housing market remains largely segregated as a result of a long history of government-sponsored discriminatory practices, pervading both rental and owned housing, and it continues to suffer from a foreclosure crisis disproportionately impacting communities of color which is now exacerbated by gentrification that threatens to exclude those of limited or moderate income from its housing markets altogether. LSNYC's clientele of low and moderate income families will bear the brunt of the failure to enforce the obligation to affirmatively further fair housing.

Legal Services NYC has no parent corporation or any publicly held corporation that owns 10% or more of its stock.

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28. Inland Fair Housing and Mediation Board

Inland Fair Housing and Mediation Board has been dedicated to fair housing education and enforcement since the early 1990s. We strongly believe in equal housing opportunity for all, free from discrimination, harassment, and hate, and have worked with jurisdictions throughout Southern California to promote compliance with both the spirit and the letter of the Fair Housing Act. We firmly believe that the creation of neighborhoods of opportunity, vibrant with diversity, makes our nation stronger. For too long, segregated communities with little access to opportunity, created by systemic governmental policies and practices, have been tolerated and implicitly condoned by systemic governmental policies and practices. Past efforts by HUD to affirmatively further fair housing in its programs and services have fallen short. The Affirmatively Furthering Fair Housing Rule promulgated in 2015 was a positive first step in addressing fair housing issues at the community planning level. The delay in implementation of the Affirmatively Furthering Fair Housing Rule amounts to an implicit understanding with jurisdictions subject to the rule that the old status quo is acceptable and condoned by HUD, the agency tasked with the enforcement of the Fair Housing Act.

Inland Fair Housing and Mediation Board has no parent corporation or any publicly held corporation that owns 10% or more of its stock.

29. Community Legal Aid Society, Inc.

Community Legal Aid Society, Inc.'s Fair Housing Initiative Program strives to eradicate discrimination in housing transactions in the state of Delaware against individuals based on race, color, national origin, religion, creed, sex, marital status, familial status, age, sexual orientation, gender identity or disability. In furtherance of this goal, the program assists people who believe they have been victims of housing discrimination through advocacy and enforcement actions;

engages in activities designed to encourage fair housing practices through education and outreach state wide; and works to identify barriers to fair housing in order to counteract and eliminate any discriminatory housing practices in Delaware. As such, we are interested in signing on to the amicus brief in support of the litigation filed by the National Housing Law Project against HUD for the delay of the affirmatively furthering fair housing rule.

Community Legal Aid Society, Inc., has no parent corporation or any publicly held corporation that owns 10% or more of its stock.

30. Inclusive Communities Project

The Inclusive Communities Project (ICP) is a local nonprofit organization that operates throughout the Dallas, TX region. ICP works for the creation and maintenance of thriving racially and economically inclusive communities, expansion of fair and affordable housing opportunities for low-income families, and redress for policies and practices that perpetuate the harmful effects of discrimination and segregation. ICP regularly advocates for policies and practices that align with its mission, the Fair Housing Act and other civil rights laws. The organization has been integrally involved in the Dallas regional AFFH process, particularly the public participation component, that has been taking place since early 2017.

Inclusive Communities Project has no parent corporation or any publicly held corporation that owns 10% or more of its stock

31. Fair Share Housing Center

Fair Share Housing Center promotes racial and economic integration in housing in New Jersey. FSHC has worked since 1975 to ensure the State of New Jersey and its municipalities comply with federal and state housing and civil rights laws. FSHC has observed the state and its municipalities acting in ways that promote racial segregation. We have also observed the State

of New Jersey take different steps that advance the purposes of the federal Fair Housing Act, both generally and with regard to disaster recovery after Hurricane Sandy because it was required to affirmatively further fair housing in response to litigation we filed. Without the obligation to fully and completely consider opportunities for integration, New Jersey, one of the most racially segregated states in the nation, would not have satisfied fully its duties under the FHA.

Fair Share Housing Center has no parent corporation or any publicly held corporation that owns 10% or more of its stock

32. Fair Housing Justice Center

The Fair Housing Justice Center (FHJC), a nonprofit civil rights organization, is dedicated to eliminating housing discrimination, promoting policies that foster open, accessible, and inclusive communities, and strengthening enforcement of fair housing laws. The FHJC serves all five boroughs of New York City and the seven surrounding New York counties of Dutchess, Nassau, Orange, Putnam, Rockland, Suffolk, and Westchester. FHJC investigations have led to legal challenges that have opened tens of thousands of housing units to populations previously excluded. The FHJC works hard to influence local, state, and federal housing policies, increase public awareness about fair housing rights, and improve how fair housing laws are enforced.

The FHJC has developed an action program to systematically eliminate housing discrimination in the New York City region by assisting individuals and organizations with housing discrimination complaints to exercise their fair housing rights. The FHJC initiates investigations that identify, document, and eliminate systemic housing discrimination. The FHJC also advocates for policies and programs that affirmatively further fair housing; engages in

outreach and educational activities to increase public awareness about fair housing rights; and provides technical assistance, training and other tools to upgrade and strengthen fair housing law enforcement.

Fair Housing Justice Center has no parent corporation or any publicly held corporation that owns 10% or more of its stock.

33. The Fair Housing Center for Rights & Research

As a fair housing agency, whose mission is to protect and expand fair housing rights, eliminate housing discrimination, and promote integrated communities, The Fair Housing Center believes that the AFFH rule is an important tool to address America's growing racial and ethnic inequality, a trend rooting in our history of segregation. The AFFH Rule will help all communities make progress towards achieving housing opportunity, overcoming historic patterns of segregation, and increase investment in areas of concentrated poverty.

Fair Housing Center for Rights & Research has no parent corporation or any publicly held corporation that owns 10% or more of its stock.

34. HOPE Fair Housing Center

The Mission of HOPE Fair Housing Center (HOPE) is to create greater housing opportunities for all individuals, regardless of race or economic background. We work to ensure that everyone has the chance to live in the community and home or apartment of their choice free from discrimination. Our goal is to expand housing opportunities for all members of our communities to rent or buy any home they can afford, thereby creating economically sound, vibrant neighborhoods. For the past five years, HOPE has engaged in robust training, technical assistance and advocacy with local jurisdictions, including PHAs, regarding their obligations to Affirmatively Further Fair Housing. HUD's announced intent to delay implementation of the

AFH regulation will have a detrimental effect on our communities and clients in our 30 county service area, it undermines our mission and goals as an organization, and it will negatively impact our organization's operations, diverting resources from other pressing work.

HOPE Fair Housing Center has no parent corporation or any publicly held corporation that owns 10% or more of its stock.

35. Housing Equality Law Project

The Housing Equality Law Project HELP is a 501(c)(3) nonprofit organization located in South San Francisco. HELP's services are available throughout the state of California, with special focus on serving communities deemed "unserved and underserved." Since HELP's inception, we have investigated an average of 100 cases (households) annually.

HELP's stated mission is "to combat discrimination and to promote equal access to housing, public accommodation and other areas for all Californians." HELP does this through a three-tiered strategy that includes (a) Education and Outreach, (b) Intake and Counseling, and (c) Investigation and Enforcement. HELP trains individuals, real estate professionals, housing providers, and organizations on Federal and California Fair Housing Laws as well as California Tenant-Landlord Laws, provides multilingual counseling on fair housing and tenant-landlord issues to both housing seekers and housing providers, and investigates housing discrimination complaints concerning housing for rent or sale, advertising, lending, insurance, steering, blockbusting and auditing new construction for accessibility compliance. HELP investigates and monitor all areas of housing through systemic and complaint-based testing. HELP was incorporated as a non-profit in 2011. HELP staff has a combined experience of 27 years specifically in the area of fair housing.

Housing Equality Law Project has no parent corporation or any publicly held corporation that owns 10% or more of its stock.

36. Miami Valley Fair Housing Center, Inc.

Miami Valley Fair Housing Center, Inc., is a private, non-profit organization located in Dayton, Ohio whose mission is to work for the elimination of housing discrimination against all persons because of race, color, religion, national origin, sex, disability, familial status, or any other characteristic protected under federal, state or local laws and to seek housing opportunities be provided without illegal discrimination. In furthering this goal, MVFHC engages in activities designed to encourage fair housing practices through educational efforts; identifies barriers to fair housing in order to help counteract and eliminate discriminatory housing practices; works with elected and government representatives to protect and improve fair housing laws; and takes all appropriate and necessary action to ensure that fair housing laws are properly and fairly enforced throughout the Miami Valley region, the State of Ohio, and nationally.

MVFHC engages with local jurisdictions to assist them in understanding their obligations to affirmatively further fair housing. MVFHC has been retained by local jurisdictions to conduct Analyses of Impediments to Fair Housing Choice and to assist in designing Fair Housing Action Plans. MVFHC actively engaged with HUD during the AFFH rulemaking process. MVFHC is particularly concerned with the ability of Ohioans to access safe and affordable housing in communities and neighborhoods of their choice without fear of discrimination. MVFHC views HUD's Affirmatively Furthering Fair Housing Rule as a long awaited and essential tool to achieve the goal of the federal Fair Housing Act.

Miami Valley Fair Housing Center, Inc., has no parent corporation or any publicly held corporation that owns 10% or more of its stock.

37. Housing Opportunities Made Equal of Virginia

Housing Opportunities Made Equal (HOME) is Virginia's private Fair Housing organization, located in Richmond, Virginia, with a service area of the State of Virginia. HOME was founded in 1971 and has worked to ensure equal access to housing for 47 years. HOME meets our mission to ensure equal housing access for all people through extensive research, housing counseling and education, fair housing advocacy and housing policy.

In 2017 HOME served 2550 clients in 70 jurisdictions throughout Virginia. This included 796 individuals with fair housing education, training, and direct services, and 181 intakes for fair housing violations. In addition, in 2017 HOME provided counseling, education and direct services to 1736 clients.

Since July 2015, the AFFH Rule required Virginia jurisdictions to be more deliberate and strategic about how they use their housing and community development resources to expand access to opportunity for all residents within each locality or risk losing HUD funding. We remain a highly segregated society and the AFFH rule provided guidance, tools, and accountability for localities to address segregated housing patterns. Where you live has a big impact on how your life unfolds. It determines the schools your children attend, the jobs you have access to, the quality of your surroundings, your access to transportation and grocery stores and other important community resources. In our region, too many children are growing up in neighborhoods that lack these resources. This not only limits their life prospects, but undermines our region's prosperity.

Housing Opportunities Made Equal of Virginia has no parent corporation or any publicly held corporation that owns 10% or more of its stock.

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38. Public Interest Law Project

The Public Interest Law Project is a California nonprofit organization providing law and policy support for California local legal services programs and other nonprofit public interest law programs. A principal focus of PILP is the illegal pattern and practice of many localities in California to exclude housing affordable to lower income households. The persons in need of affordable housing are disproportionately persons protected by the Fair Housing Act. PILP has joined with local programs to advocate and to bring administrative actions and litigation to enforce the FHA mandate to affirmatively further fair housing in all communities. One successful effort was to win commitment from the State of California to prepare a robust Analysis of Impediments to Fair Housing Choice after many years of recalcitrance. This AI and the updated Fair Housing Assessments required by the AFFH Rule have helped insure that the state and all the localities receiving HUD funds take meaningful steps to enable inclusion of housing opportunities for all Californians.

Public Interest Law Project has no parent corporation or any publicly held corporation that owns 10% or more of its stock.

39. Eden Council for Hope and Opportunity

The Eden Council for Hope and Opportunity (ECHO Housing) was founded in 1964 and incorporated in 1965 by community volunteers dedicated to equal housing opportunities and the prevention and elimination of homelessness. Established as a fair housing agency, ECHO has expanded to a full service housing counseling organization providing services to very low and moderate income clients. ECHO's services reach over 5,000 clients per year with housing information and assistance in 17 California counties and cities. ECHO's primary service component continues to be fair housing; however, more recent services have been directed to

intervention and prevention of homelessness. Current service programs include fair housing, tenant/landlord, shared housing counseling, homeless prevention, rental assistance, rent/deposit grant program, first-time homebuyer education, and rent review and eviction harassment programs.

Eden Council for Hope and Opportunity has no parent corporation or any publicly held corporation that owns 10% or more of its stock.

40. Homewood Concerned Citizens Council

The Homewood Concerned Citizens Council formed as a response to resident and community concerns in the involvement and participation of community awareness, public safety and community & economic development in the City of Pittsburgh Homewood Community. The rollback to the pre-2015 Analysis of Impediments process puts the city of Pittsburgh at risk of not being held accountable or conversely recognized for taking meaningful steps towards affirmatively furthering fair housing. Certainly, the racial segregation of the city and the inaccessibility of aged housing stock cannot be understated.

Homewood Concerned Citizens Council has no parent corporation or any publicly held corporation that owns 10% or more of its stock.

41. Fair Housing Advocates Association

The mission of the Fair Housing Advocates Association is to eliminate housing discrimination, lending and homeowners insurance discrimination, and racial and sexual harassment and ensure housing opportunities for all people. Specifically, the FHAA seeks to eliminate housing discrimination against all persons because of race, color, religion, national origin, sex, disability, or familial status. In furthering this goal, FHAA engages in activities designed to encourage fair housing practices through educational efforts; assists persons who

believe they have been victims of housing discrimination; identifies barriers to fair housing in order to help counteract and eliminate discriminatory housing practices; works with elected and government representatives to protect and improve fair housing laws; and takes all appropriate and necessary action to ensure that fair housing laws are properly and fairly enforced throughout Summit County, City of Barberton, and Ohio. The AFFH regulation will play a vital part in our Country's lawful responsibility to provide for fair housing throughout the United States.

Fair Housing Advocates Association has no parent corporation or any publicly held corporation that owns 10% or more of its stock.

42. National Coalition for the Homeless

The National Coalition for the Homeless (NCH) is a national network of people who are currently experiencing homelessness or who were once homeless, activists and advocates, community and faith-based homeless service providers, and others committed to a single mission: to end homelessness. NCH employs public education and grassroots organizing to create the systemic and attitudinal changes necessary to prevent and end homelessness. In its policy advocacy, NCH works diligently to ensure that housing resources and opportunities are available to all families and individuals who are at risk of becoming homeless, or who are currently unhoused.

NCH was formed in the early 1980's after deep cuts in the 1970's to Federal affordable housing programs. The number of Americans experiencing homelessness today can be traced to these cuts, as well as in historic and systematic discrimination in home rental and selling policies. The Fair Housing Act of 1968 must be upheld to ensure that all Americans, regardless of race, religion, disability, appearance, or source of income, have the same access to accessible and affordable housing.

National Coalition for the Homeless has no parent corporation or any publicly held corporation that owns 10% or more of its stock.

43. Fair Housing Center of Metropolitan Detroit

The Fair Housing Center of Metropolitan Detroit (FHCMD), a non-profit, tax-exempt, citizen based organization, was established in April, 1977 for the purpose of addressing fair housing issues in the metropolitan Detroit area. FHCMD seeks to assure equal access to housing without discrimination based on race, sex, age, color, religion, national origin, familial, marital, sexual orientation or disability status. Consistent with the level of resources available, FHCMD:

- Assists in the investigation of complaints of unlawful housing discrimination;
- Refers some housing discrimination complainants to other agencies or legal resources; Initiates negotiations, conciliations and litigations to help resolve equal housing disputes;
- Provides homeseekers with information about the sales and rental market and assists homeseekers who are considering non-traditional housing choices;
- Conducts research projects and housing surveys to evaluate fair housing practices or assist in industry self-testing programs in the sales, rental or mortgage lending markets;
- Provides consulting and program implementation services to employers, businesses, units of government and housing providers that are seeking to develop or implement fair housing programs;
- Conducts training and public information programs on fair housing issues; and
- Works with neighborhood groups, community organizations and other service providers to help promote and achieve more racially and ethnically diverse neighborhoods.

Since 1977 we have served on average 2000 residents a year in terms of complaint investigation, education and outreach and an additional 8,000 people receive our newsletter.

44. Race Forward

Race Forward advances racial justice through policy development, sector transformation, research, movement and capacity building, and narrative strategy. In July of 2017, the historic

Race Forward merged with the Center for Social Inclusion (CSI). Founded in 1981, the historic Race Forward brings systemic analysis and an innovative approach to complex race issues to help people take effective action toward racial equity. Founded in 2002, CSI works with community, government, and other institutions to craft and apply strategies and tools to achieve racial equity. As one organization, we are dedicated to transforming institutions and empowering community in order to move policy, culture, and narrative for racial equity. Race Forward has offices in New York and Oakland and works in communities across the country. On an annual basis, we engage with over ten thousand people.

Fair Housing Center of Metropolitan Detroit has no parent corporation or any publicly held corporation that owns 10% or more of its stock.

45. Fair Housing Resource Center, Inc.

The Fair Housing Resource Center, Inc., is a non-profit 501(c)(3) organization that offers several housing programs that benefit residents of Lake, Geauga, and Ashtabula Counties, Ohio. Our mission is to promote equal housing opportunities for all persons and to advocate for fair housing and diversity in Lake County and surrounding communities through education and involvement of the public, government, and the business community.

Fair Housing Resource Center, Inc., has no parent corporation or any publicly held corporation that owns 10% or more of its stock.

46. Western Regional Advocacy Project

Western Regional Advocacy Project was founded in 2005 by nine western US community-based organizations in California, Colorado and Oregon to serve as a research, artwork and organizing hub. WRAP was created to expose and eliminate the root causes of civil and human rights abuses of people experiencing poverty and homelessness in our communities.

Western Regional Advocacy Project has no parent corporation or any publicly held corporation that owns 10% or more of its stock.

47. Heights Community Congress

Ever since the passing of the Fair Housing Act, Heights Community Congress has been working diligently to create a more just and equitable community in Cleveland Heights, Ohio.

Heights Community Congress has no parent corporation or any publicly held corporation that owns 10% or more of its stock.

48. Metropolitan St. Louis Equal Housing and Opportunity Council

In the St. Louis region, our organization assists our local program participants to understand and create fair housing planning documents that meaningfully work to overcome segregation and promote integration. The St. Louis region consistently ranks as one of the most segregated regions in the county. We know that our segregated region was not created by accident, and instead is a result of decades of public policies that created and maintained segregated living patterns. The obligation to Affirmatively Further Fair Housing is a way to undo segregation and ensure that all people have access to opportunities. The AFFH Rule is critical to ensuring that cities, counties and public housing authorities are effectively meeting their obligation to affirmatively further fair housing by providing data, guidance, and assistance. The AFFH Rule's suspension removes that accountability for program participants to the law and their AFFH obligation. Fair housing planning documents coming due are no longer going to be coordinated to facilitate meaningful decisions and set goals to overcome fair housing issues and promote access to opportunity for all people. Our St. Louis community will continue to be segregated and families will continue to face barriers to housing opportunities.

Metropolitan St. Louis Equal Housing and Opportunity Council has no parent corporation or any publicly held corporation that owns 10% or more of its stock.

49. Greater Napa Valley Fair Housing Center

The Greater Napa Valley Fair Housing Center, dba Fair Housing Napa Valley (FHNV), is a private, 501(c)(3) non-profit agency that serves Napa and Solano Counties in the northern San Francisco Bay Area. FHNV is dedicated to promoting and developing fairness and equality of housing opportunity for all people. FHNV works to eliminate housing discrimination and ensure equal housing opportunities through intake and referral, counseling, advocacy, education, and outreach, mediation, investigation, and enforcement. Relying principally on the Fair Housing Act (FHA), FHNV engages in enforcement efforts (as appropriate) to corroborate discriminatory housing practices and mitigate their effects. This includes the Affirmatively Furthering Fair Housing (AFFH) Rule, which is vital in FHNV's partnerships with local and state entities to promote inclusive communities and equal housing opportunities, and eradicate discriminatory housing practices.

Greater Napa Valley Fair Housing Center has no parent corporation or any publicly held corporation that owns 10% or more of its stock.

50. National Coalition for the Homeless

The National Coalition for the Homeless (NCH) is a national network of people who are currently experiencing homelessness or who were once homeless, activists and advocates, community and faith-based homeless service providers, and others committed to a single mission: to end homelessness. NCH employs public education and grassroots organizing to create the systemic and attitudinal changes necessary to prevent and end homelessness. In its policy advocacy, NCH works diligently to ensure that housing resources and opportunities are

available to all families and individuals who are at risk of becoming homeless, or who are currently unhoused.

NCH was formed in the early 1980's after deep cuts in the 1970's to Federal affordable housing programs. The number of Americans experiencing homelessness today can be traced to these cuts, as well as in historic and systematic discrimination in home rental and selling policies. The Fair Housing Act of 1968 must be upheld to ensure that all Americans, regardless of race, religion, disability, appearance, or source of income, have the same access to accessible and affordable housing.

National Coalition for the Homeless has no parent corporation or any publicly held corporation that owns 10% or more of its stock.

51. CNY Fair Housing

CNY Fair Housing is a non-profit fair housing organization located in Syracuse and serving 8 counties in Central and Northern New York. Our organization investigates complaints of discrimination and provides education and outreach on fair housing rights. We also conduct research and provide technical assistance to municipalities throughout New York State related to their obligation to Affirmatively Further Fair Housing. We have trained municipalities and housing authorities on the AFFH rule and HUD data tool.

In the past four years since the draft AFFH rule was released, CNY Fair Housing has conducted four Analyses of Impediments or Assessments of Fair Housing for jurisdictions in New York. Prior to the rule being finalized, our agency utilized the outline for the Assessment of Fair Housing for the completion of Analyses of Impediments because we believed it provided a more rigorous and accurate assessment of fair housing issues in these communities. Prior to the suspension of the rule in January, we were in initial talks to complete two regional Assessments

of Fair Housing for four jurisdictions in the area. Our agency and the jurisdictions are now uncertain about how to proceed with completing this work. We are particularly discouraged by the suspension of the AFFH rule because two of the jurisdictions have not completed an Analysis of Impediments in 10 years because of the lack of enforcement from HUD prior to the AFFH rule's implementation. The Syracuse region is one of the worst communities in the country for segregation and inequality of opportunity and it is essential that the municipalities here be given the tools and accountability that the AFFH rule provided.

CNY Fair Housing has no parent corporation or any publicly held corporation that owns 10% or more of its stock

52. Equal Rights Center

The Equal Rights Center (ERC) is a civil rights organization that identifies and seeks to eliminate unlawful and unfair discrimination in housing, employment, and public accommodations in its home community of Greater Washington, D.C. and nationwide. Full implementation of the Affirmatively Furthering Fair Housing Rule is critical to ensuring that the ERC can achieve its mission. The Affirmatively Furthering Fair Housing Rule helps ensure that all people – regardless of race, ethnicity, sex, family status or disability – have a range of choices about where to live, that all neighborhoods are good places to live, regardless of the demographics of their residents, and that all people and communities are treated fairly.

Equal Rights Center has no parent corporation or any publicly held corporation that owns 10% or more of its stock.

53. National Urban League

Established in 1910, the National Urban League is the Nation's oldest and largest community based movement devoted to empowering African Americans to enter the economic

and social mainstream. Today, the National Urban League, headquartered in New York City, spearheads the non-partisan efforts of its local affiliates. There are over 100 local affiliates of the National Urban League located in 35 states and the District of Columbia providing direct services to more than 2 million people nationwide through programs, advocacy, and research. The mission of the Urban League movement is to enable African Americans to secure economic self-reliance, parity, power and civil rights. The Urban League seeks to implement that mission by, among other things, supporting the delivery of a wide spectrum of housing counseling services to homebuyers, homeowners, low-to moderate-income renters, and the homeless. The organization works towards the goal that by 2025 "Every American lives in safe, decent, affordable and energy efficient housing on fair terms."

National Urban League has no parent corporation or any publicly held corporation that owns 10% or more of its stock.

54. Housing Opportunities Made Equal, Inc. (New York)

Housing Opportunities Made Equal, Inc. is a civil rights organization in Buffalo, N.Y. , whose mission is to promote the value of diversity and ensure all people an equal opportunity to live in the housing and communities of their choice. The Affirmatively Furthering Fair Housing Rule empowers localities to identify barriers to housing choice and develop solutions that benefit all people by fostering strong, inclusive communities that are free from discrimination. The U.S. Department of Housing and Urban Development cannot abandon its affirmative duty to combat discrimination and break down the barriers of segregation and hatred that cripple communities throughout our nation. For far too long, municipalities have received federal funds while ignoring their statutory obligations to facilitate desegregation and integration. We cannot tolerate further inaction and indifference; our communities demand fair housing now.

Housing Opportunities Made Equal, Inc., (New York) has no parent corporation or any publicly held corporation that owns 10% or more of its stock.

55. Connecticut Fair Housing Center, Inc.

The Connecticut Fair Housing Center (CFHC) is a state-wide organization dedicated to ensuring that all Connecticut residents have access to all neighborhoods. As part of its mission, the Center works with state and local governments to ensure that they are affirmatively furthering fair housing. As a result, CFHC wrote the State of Connecticut's 2015 Analysis of Impediments to Fair Housing Choice and as been asked to consult with local governments on the Assessment of Fair Housing. CFHC believes that the Assessment of Fair Housing is a far superior tool that will promote integration in Connecticut's highly segregated communities.

Connecticut Fair Housing Center, Inc., has no parent corporation or any publicly held corporation that owns 10% or more of its stock

56. Sheryll Cashin, Professor of Law, Georgetown Law Center

Sheryll Cashin is the Carmack Waterhouse Professor of Law, Civil Rights and Social Justice at the Georgetown University Law Center. She writes about civil rights and race relations in America and has written several books about race including *Loving: Interracial Intimacy in America and the Threat to White Supremacy* (Beacon, 2017) and *The Failures of Integration* (PublicAffairs, 2004) which explored the persistence and consequences of race and class segregation. Professor Cashin was law clerk to U.S. Supreme Court Justice Thurgood Marshall and Judge Abner Mikva of the U.S. Court of Appeals for the District of Columbia Circuit.

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57. Denver Metro Fair Housing Center

The Denver Metro Fair Housing Center welcomed the AFFH Rule as it was determined by the Government Accountability Office (GAO) that the previous AI process was ineffective to move towards the goals of the fair housing act. DMFHC has spent time reviewing AIs submitted by jurisdictions in our service area and agree with the findings of the GAO. Further, we have spent significant time working with local jurisdictions and with-in local jurisdictions to prepare to conduct an AFH. Having held an AFFH Summit in the fall of 2015, been part of community engagement at various levels, and speaking about the AFH process to get interested parties to be part of the communicative process regarding fair housing barriers present in local communities. The withdrawal of the AFFH Rule and current notices from HUD regarding the issue is sending mixed signal to entitlement jurisdictions and has slowed the Denver Regional AFH.

Denver Metro Fair Housing Center has no parent corporation or any publicly held corporation that owns 10% or more of its stock.