

October 11, 2024

Regulations Division Office of General Counsel  
Department of Housing and Urban Development  
451 7th Street, SW, Room 10276  
Washington, DC 20410-0500  
Sent electronically via the *Federal Register*

**RE: HUD's Choice Neighborhoods Grant Selection Process and Award Implementation**

Dear colleagues,

On behalf of the Poverty & Race Research Action Council (PRRAC), I am writing to provide our comments in response to HUD's Request for Information regarding the Choice Neighborhoods Initiative (CNI). PRRAC is a civil rights law and policy organization dedicated to advancing policies that promote fair housing, racial equity, and housing mobility. We appreciate the progress HUD has made through CNI in transforming public and federally assisted housing and promoting neighborhood revitalization. However, to maximize the potential of CNI, we believe that two key areas need to be strengthened to counteract the effects of segregation and the concentration of poverty.

***Strengthening Housing Mobility Services***

A crucial component of CNI is its explicit requirement for grantees to provide housing mobility counseling and housing search assistance for residents displaced due to redevelopment efforts. This requirement is vital in ensuring that families have the support they need to navigate the challenges of relocation. We also appreciate that HUD encourages the provision of mobility counseling over multiple years, allowing families to receive ongoing assistance rather than just initial relocation support. The most successful mobility programs include extensive post-move counseling to support and help guide families long after their initial move.

A people-based approach that respects family choices is vital to realizing these goals. Families should have the agency to choose where they live and be properly informed of the benefits of moving to be better resourced neighborhood. As part of this people-centered strategy, HUD must continue to ensure that mobility counseling programs are available to assist families in navigating these choices.

***Promoting School Integration as Part of Revitalization***

Education and housing are deeply interconnected, and improving local schools should be a vital component of a CNI project. HUD should continue to facilitate partnerships between housing authorities and educational institutions to improve the quality of education in revitalized neighborhoods, and to

expand educational choices for CNI families. The Department of Education has recently prioritized engagement with public housing authorities and public housing redevelopment in the Magnet Schools Assistance Program,<sup>1</sup> and HUD should follow suit. The importance of educational initiatives in the Choice Neighborhoods Initiative should be framed within the larger context of addressing segregation and concentrated poverty.<sup>2</sup> CNI can foster educational equity, ensuring that children living in redeveloped neighborhoods have access to inclusive, high-quality schools that reflect the diversity of the larger community.

We appreciate the opportunity to provide these comments and look forward to continuing our partnership with HUD to advance housing justice and equity for all.

Sincerely,



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<sup>1</sup> <https://www.govinfo.gov/content/pkg/FR-2024-03-14/pdf/2024-05420.pdf>.

<sup>2</sup> See “Mixed Income Neighborhoods and Integrated Schools: Linking HUD’s Choice Neighborhoods Initiative with the Department of Education’s Magnet Schools Assistance Program” (PRRAC, March 2021), <http://www.prrac.org/pdf/choice-neighborhoods-and-magnet-schools.pdf>.