



October 15th, 2019

Submitted via www.regulations.gov

Office of the General Counsel, Rules Docket Clerk
Department of Housing and Urban Development
451 7th Street, SW
Room 10276
Washington, D.C. 20410-0001

Re: Docket No. FR-6111-P-02 HUD's Implementation of the Fair Housing Act's Disparate Impact Standard
Docket ID: HUD-2019-0067

Dear Office of the General Counsel:

I am writing on behalf of Prevention Institute to express our strong opposition to the Department of Housing and Urban Development's (HUD) proposed changes to the disparate impact rule under the Fair Housing Act. We urge HUD to withdraw this proposed rule and leave the disparate impact standard in place and unaltered.

Founded in 1997, Prevention Institute is a national nonprofit organization dedicated to promoting health, safety, and wellbeing through thriving, equitable communities. Equal opportunity in housing is necessary to ensure that all communities across America thrive. People's ability to stay in their homes and communities, rooted to their social networks, depends on the availability, quality, and location of affordable housing.¹ Rather than attempting to weaken the disparate impact rule, HUD should be working to vigorously enforce it.

Housing discrimination has severe and lasting health consequences. Where a child lives — including the quality and affordability of their family's housing, and whether their family owns their home — shapes how healthy that child will be, what kind of schools they can attend, even how long they'll live. Discrimination practices in the housing sector continue today, limiting the neighborhoods and opportunities Americans of color have available to them. A report by the Harvard T.H. Chan School of Public Health and National Public Radio showed that nearly half of Black Americans, a third of Latinos, and a fourth of Asian Americans have experienced racial and ethnic discrimination when trying to rent a room or apartment or buy a house.² And the effects of housing discrimination on health can reverberate for decades. Even though redlining (the policy of discouraging economic investment, typically in highly-segregated African American and Latino neighborhoods) formally ended over 50 years ago, researchers have found that life expectancy is still lower in areas that were previously redlined.

In closing, we respectfully urge that HUD withdraws its proposal to undermine the Fair Housing Act. The Fair Housing Act has worked for more than 50 years to eliminate barriers to housing and promote opportunity, and while it needs more enforcement from HUD, it would be a disaster to weaken it or its enforcement tools. Rather than creating new barriers, now is the time to advance policies that make fair and affordable housing a reality for all communities. Thank you for the opportunity to submit comments on the proposed rulemaking.

Sincerely,

A handwritten signature in black ink, appearing to read "Sana Chehimi".

Sana Chehimi, MPH
Director of Policy & Advocacy
Prevention Institute

¹ Aboelata, M.J., Bennett, R., Yañez, E, Bonilla, A., & Akhavan, N. (2017). Healthy Development Without Displacement: Realizing the Vision of Healthy Communities for All. Oakland, CA: Prevention Institute.

² Discrimination in America: Final Summary. Harvard T.H. Chan School of Public Health, National Public Radio, and the Robert Wood Johnson Foundation, January 2018.