



April 21, 2023

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

Submitted electronically via the Federal Rulemaking Portal at www.regulations.gov

RE: Affirmative Furthering of Fair Housing, Docket No. FR-6250-P-01

To Whom it May Concern:

The Oak Park Regional Housing Center is a 501(c)(3) non-profit organization that was established in 1972 to affirmatively further fair housing in Oak Park, IL and the surrounding region. Throughout our history, the Housing Center has been repeatedly cited as a model of affirmative furthering of fair housing by promoting a racially inclusive and integrated housing market in Oak Park, IL. We greatly appreciate HUD's recommitment to the affirmative furthering of fair housing (AFFH) and hope to see HUD and its grantees focus more on proactive measures that can address structural and systemic issues of segregation.

We appreciate this updated Rule and believe it would be even more effective with two crucial improvements.

HUD should make clear that the definitions of integration and segregation also address the issue under-representations of protected groups. Integration is the critical component to leveraging diversity as a community asset. However, integration is a hollow concept in communities where the presence of protected groups is significantly under-represented. Grantees must be required to affirmatively market their communities to under-represented groups in addition to ensuring that those groups are integrated within the jurisdiction.

HUD should include fair housing strategies that replicate the Housing Center model of providing affirmative counseling to market-rate renters and homebuyers. While HUD laudably includes recommendations for mobility counseling, this is insufficient to have a significant impact on patterns of segregation and concentrations of poverty. Mobility counseling serves fewer than 2.5 million US households. Meanwhile 48 million market-rate rental households would make a far greater impact if their moves were influence by affirmative counseling. HUD is missing a tremendous opportunity to create change by ignoring these households.

Moreover, the Housing Center surveyed residents in our community about the Rule three themes emerged from their responses.

Residents like the idea of Equity Plans and hoped that HUD would encourage other communities to engage in fair housing issues at the level these issues are addressed in Oak Park. However, they were also confused about how these plans might work across jurisdictions that might be very different. For instance, If Oak Park submitted a plan jointly with Cook County, it might mask the accomplishments in Oak Park and falsely make other communities appear to be making more progress than in actuality.

Tracey Royal
President

Victoria Vann
Vice President/Acting Sec'y

Athena Williams
Executive Director



Residents overwhelmingly appreciated the enhancement of community engagement and its emphasis on efforts to ensure diverse participation. There were also some concerns that community engagement could provide an opportunity for entrenched interests to create obstacles to progress.

Residents generally like the addition of annual evaluations and the need to report on progress toward goals. They like the increase in accountability. However, they are skeptical that HUD will live up to this provision and suspect that many communities will continue to progress too slowly.

Overall, we hope that HUD fully commits to the Rule and to AFFH generally. The fact that America's cities and metropolitan regions remain stubbornly segregated and inequitable is evidence that reactive measures that have dominated fair housing are not adequate to make real progress to a just and equitable housing market. If HUD hopes to have significant impact on expanding housing choices, improving residential integration, and reducing concentrations of poverty, the agency must make AFFH its top priority and interweave it into all of its programs.

Sincerely,

Athena Williams, Executive Director
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