



The Honorable Ben Carson
Secretary
U.S. Department of Housing and Urban Development
451 - 7th Street S.W.
Washington, DC 20410

July 29, 2020

RE: AIA's Strong Opposition to the Department of Housing and Urban Development's Final Rule Dismantling the Affirmatively Furthering Fair Housing Rule

Dear Secretary Carson,

The American Institute of Architects (AIA) represents over 95,000 licensed architects and design professionals. AIA is committed to protecting the health, safety, and welfare of the public. Since 1857, this concern is central to all that we, as architects, do. As designers of affordable housing, we know that access to safe and healthy housing is foundational to human wellness. Yet, many Americans struggle to afford it.

It is also clear that generations of Americans of color have faced deep inequities in access to housing, some of which persist to this day. The AIA supports policies, like Department of Housing and Urban Development's (HUD's) Affirmatively Furthering Fair Housing (AFFH) rule. Such policies can help confront the legacy of discriminatory zoning and housing policies. As such, the AIA writes to raise our strong and unequivocal opposition to the recently announced nullification of the AFFH rule.

On July 23rd, the Department of Housing and Urban Development (HUD) issued a press release notifying the public of the final rule *Preserving Community and Neighborhood Choice*, which officially repeals the AFFH rule. Dismantling federal government incentives put in place to eliminate housing segregation will reverse the important gains on housing desegregation made over recent years. At a critical moment of historic national upheaval to address racial inequity, the timing of this AFFH final rule is troubling. We need to do more – not less – to provide equal and equitable opportunity to all Americans, especially for a basic human need such as shelter.

According to this Administration's HUD *2018 Point-In-Time* report, African Americans are a disproportionate percentage of the American homeless population – accounting for 51 percent of people experiencing homelessness. This drastically contrasts with the fact that African Americans comprise only 13 percent of the total U.S. population. Instead of addressing the issue of supply, dismantling the AFFH rule will only serve to strengthen existing disparities in affordable housing by weakening federal enforcement to address housing segregation. This will further deplete the already under-supplied housing stock for Americans in communities of color.

Additionally, HUD's final rule weakens the federal definition of what constitutes fair housing. This will further exacerbate segregation discrepancies in subsidized affordable housing by providing the opportunity to normalize anemic fair housing policies in communities across the country. Adding that public housing agencies (PHAs) will now only be required to self-certify statutory minimum requirements to receive access to federal housing grants, a great deal of federal accountability will have been lost.

Thank you for your careful review of AIA's concerns and its strong opposition to HUD's final rule to eliminate the AFFH rule. Please do not hesitate to contact either of us if you have any additional questions about our stance on this critical issue.

Sincerely,



L. Jane Frederick, FAIA
2020 AIA President



Robert Ivy, FAIA
EVP/Chief Executive Officer

The American Institute of Architects

1735 New York Avenue NW
Washington, DC 20006

T (800) 242 3837
F (202) 626 7547

www.aia.org