



February 13, 2015

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

Docket No. FR-5173-N-03 –Affirmatively Furthering Fair Housing: Re-Opening of Public Comment Period on Subject of Later AFH Submission Date for Certain Entities

To Whom It May Concern:

On behalf of Enterprise Community Partners (Enterprise), I appreciate the opportunity to provide feedback on later submission dates for certain entities completing Assessments of Fair Housing (AFH) under HUD’s proposed Affirmatively Furthering Fair Housing (AFFH) rule. Enterprise is a national nonprofit organization whose mission is to create opportunity for low- and moderate-income people through affordable housing in diverse, thriving communities. We work to achieve this by introducing solutions through cross-sector public-private partnerships with financial institutions, governments, community organizations and other partners that share our vision. Since 1982, Enterprise has raised and invested \$16 billion to help finance nearly 320,000 affordable homes across the United States.

In our previous comments on the AFFH rule, Enterprise has called for a more balanced approach to fair housing by supporting both revitalization of affordable housing in areas of concentrated poverty and new affordable housing in high-opportunity areas. Our September 2013 letter, submitted in partnership with the Local Initiatives Support Corporation and the National Housing Trust, recommends “providing guidance to jurisdictions to take on a both/and approach rather than a restrictive either/or approach.”

As a means to that end, we support HUD’s efforts to create a more meaningful process to affirmatively further fair housing. In order to ensure its success, we believe that small entities will need more time to prepare an AFH and will need additional training and technical assistance to complete this extensive process.

There are several outstanding issues regarding AHF requirements that will pose challenges for submitting entities until they are resolved. The tools for states and regions have not been published at this time, and the lack of a working template for the tool creates uncertainty about the time required, staff capacity and minimum requirements for completion. We find that the 200 hour estimate for completion of the Assessment Tool is likely a low estimate. In addition, HUD has not yet published guidelines on joint submissions, nor has HUD published a schedule for training on the Assessment Tool.

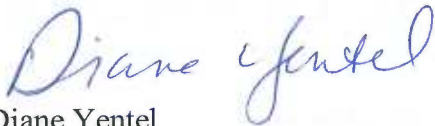
For these reasons, Enterprise recommends delayed submission for certain entities until HUD is able to provide: 1) a published Assessment Tool for each kind of entity (e.g. regions, PHAs, entitlements); 2) a pilot for each kind of entity; 3) training and technical assistance beginning with pilot entities that expands to all grantees; and 4) a staggered schedule that allows larger entities to submit first and allows for delayed submission by smaller grantees. Delayed submission could be provided by a waiver based on certain criteria such as cost, staff resources and training availability.

It is also important that the office of Fair Housing and Equal Opportunity (FHEO) consider the schedule for Consolidated Plan and Public Housing Agency Plans when granting delayed submission. Submitting entities should be given the adequate time to incorporate the data and information from the AFH into these plans.

We believe that HUD will be able to more effectively further fair housing if entities have the training, tools, guidance and resources to submit successful AFHs, and appreciate this opportunity to provide feedback around this important issue.

If you have any questions regarding these comments, please contact Manuel Ochoa, senior policy analyst and project director, at (202) 407-8715.

Sincerely,

A handwritten signature in blue ink that reads "Diane Yentel". The signature is written in a cursive, flowing style.

Diane Yentel
Vice President, Public Policy and Government Affairs
Enterprise Community Partners