June 10, 2024

The Honorable Adrienne Todman
Acting Secretary
U.S. Department of Housing and Urban Development
Washington, D.C.

To Acting Secretary Todman:

We, the undersigned 327 organizations, write in support of the Department of Housing and Urban Development’s (HUD’s) efforts to decrease barriers to HUD housing programs for formerly incarcerated and convicted people. In particular, we write in support of the efforts exemplified in the recent Notice of Proposed Rule Making (NPRM), “Reducing Barriers to HUD-Assisted Housing” (FR-6362-P-01). While some of the signatories of this letter may have supplied individual comments responding to the questions posed in the NPRM, we are united in our support for increased access to housing for formerly incarcerated and convicted people and their families.

An estimated one in three Americans has some kind of conviction or arrest record,¹ which poses a significant barrier to finding affordable housing in an already extremely tight rental market. Nationally, there is a shortage of 7.3 million affordable, available rental units for people with the lowest incomes, and only 34 affordable, available rental homes exist for every 100 of the lowest-income households.² Due to employment discrimination, formerly incarcerated and convicted people typically work in lower-paying jobs or survive on fixed incomes, making it more difficult to afford the cost of housing.³ Overly restrictive background screening practices place people impacted by the criminal-legal system at a significant disadvantage to finding quality, affordable housing, increasing the risk of housing instability, homelessness, and reincarceration as more communities enact laws criminalizing homelessness.⁴

While there are several federal admissions policies created by Congress that all Public Housing Authorities (PHAs), owners, and operators of HUD-assisted housing must follow, these policies act as a floor and are often supplemented with additional screening polices that, taken together, can act as a de facto ban on formerly incarcerated and convicted people from HUD-assisted housing. Bias in the criminal-legal system has caused people of color – particularly Black, Native, and Latino people – as well as people with disabilities and members of the LGBTQ+

---

community to be disproportionately targeted and impacted by the criminal-legal system,\(^5\) and the number of incarcerated women has grown at twice the rate of incarcerated men.\(^6\) As such, restrictive background screening policies likely have a disparate impact on these groups and run the risk of violating \textit{Fair Housing Act} protections.

The barriers created by these policies make it exceedingly difficult for people exiting incarceration and those with conviction histories to find safe, affordable, accessible housing. As a result, people who have been incarcerated once are seven times more likely to experience homelessness than the general population, while those who have been incarcerated more than once are 13 times more likely to experience homelessness.\(^7\) Without stable housing, people exiting incarceration are twice as likely to experience reincarceration than their peers living in stable homes.\(^8\) As a central social determinant of health,\(^9\) education,\(^10\) and economic mobility,\(^11\) access to stable housing is critical to ensuring individuals, families, and communities are safe, healthy, and thriving.

While there is significant evidence of the harm overly restrictive policies cause to individuals, families, and communities, there is no evidence suggesting these policies positively impact public safety, and no evidence justifying the blanket exclusion of people with conviction histories from housing.\(^12\) Rather, studies show that people with criminal records have similar rates of maintained housing stability as people without criminal records.\(^13\) Moreover, 22 PHAs have already adjusted their screening policies to limit the scope of records considered and have not reported any significant changes to public safety outcomes.\(^14\)

\(^7\) Couloute, L. (2018). “Nowhere to Go: Homelessness Among Formerly Incarcerated People.” Prison Policy Initiative. \url{https://www.prisonpolicy.org/reports/housing.html#text=But%20people%20who%20have%20been%20from%20their%20first%20prison%20term
Stable, accessible, affordable housing is vital to helping formerly incarcerated and convicted people gain employment, advance their education, reunite with family, stay healthy, and ultimately thrive. This NPRM represents an important step forward in HUD’s work reducing barriers to housing access for formerly incarcerated and convicted people, and can help create needed clarity for PHAs, owners, and operators of HUD-assisted housing by standardizing admission and termination practices to ensure they do not violate the Fair Housing Act or other civil rights protections.

We thank HUD for its work so far, and we look forward to continuing to work with the department on this important goal.

Sincerely,

NATIONAL AND MULTISTATE ORGANIZATIONS
A Little Piece Of Light
ACOJA Consulting LLC
Affordable Homeownership Foundation, Inc.
American Civil Liberties Union
Association of Maternal and Child Health Programs
BlueLine Development, Inc.
Butler Family Fund
Center for Employment Opportunities
Chicanos Por La Causa
Childrens Defense Fund
Church World Service
Coalition on Human Needs
Community Catalyst
Community Solutions
Compass Working Capital
Corporation for Supportive Housing
Dream.Org
Equal Rights Center
Fair Share Housing Center
Faith in Harm Reduction
Horizon Behavioral Health PLLC
Housing Options Provided for the Elderly, Inc.
Howard Hanna Real Estate Services
Injustice Reform Network
Integrated Community Solutions, Inc.
It Still Takes a Village
Local Initiatives Support Corporation
Loevy & Loevy
MLPB
More Than Our Crimes
My Dog Is My Home
National Alliance on Mental Illness
National Association of Social Workers
National Center for Medical-Legal Partnership
National Coalition for the Homeless
National Disability Rights Network
National Foundation for Affordable Housing Solutions, Inc.
National Health Care for the Homeless Council
National Homelessness Law Center
National Low Income Housing Coalition
National Organization for Women
National Womens Law Center
NCS Community Development Corporation
NETWORK Lobby for Catholic Social Justice
Pathways Wellness Program
Professional Contract Services, Inc. (PCSI)
Phumulani - African Women Against Violence
PolicyLink
REDF
Reframe Health and Justice
Root & Rebound
StoptheDrugWar.org
Thriven Design
Union for Reform Judaism
Union of Concerned Scientists

STATE AND LOCAL ORGANIZATIONS

ALABAMA
Souhtown Public Housing

ARIZONA
Sister Jose Women's Center
The Mind Body Counseling Center PLLC

ARKANSAS
Arkansas Coalition of Housing and Neighborhood Growth for Empowerment (ACHANGE)
NAP Unlimited LLC

CALIFORNIA
All Home
Behavioral Health Planning Council
Brilliant Corners
Buena Vista Community Institute
California Housing Partnership
Catholic Charities
CSUN Project Rebound
Davis Opportunity Village
East Bay Housing Organizations
Episcopal Community Services
Eviction Defense Collaborative
Five Keys
Insight Garden Program
Los Angeles Community Action Network
Los Angeles Housing Department
Lutheran Social Services
Mutual Housing California
Office of Santa Ana City Councilmember Jessie Lopez
PATH
RFV Architecture
Sacramento Regional Coalition to End Homelessness
Sisters of St. Joseph Healthcare Foundation
Speak Up!
Stanislaus County Office of Education
Tenant Association Coalition of San Francisco
Tenants Together
The People Concern
Ventura Homeless Prevention

COLORADO
Center For Independence
Colorado Coalition for the Homeless
Colorado Cross-Disability Coalition
Homeward Pikes Peak
Mental Health & Inclusion Ministries
One Man Handyman
The Delores Project

CONNECTICUT
Alliance For Living
Connecticut Coalition to End Homelessness
Partnership for Strong Communities
The Housing Collective

DELAWARE
Housing Alliance Delaware
United Way of Delaware

**DISTRICT OF COLUMBIA**
ACLU-DC of American University
Coalition for Non Profit Housing and Economic Development
Mommieactivist and Sons
Pathways to Housing DC
The Washington Legal Clinic for the Homeless
Tzedek DC
University Legal Services
Washington Lawyers' Committee for Civil Rights and Urban Affairs
Wesley Housing

**FLORIDA**
Florida Alliance for Community Solutions, Inc.
Florida Justice Center
Florida Justice Institute
Grace Marketplace
Ormond Beach Housing Authority
Stone Soup Development, Inc.
YWIFI Realty

**GEORGIA**
3Keys, Inc.
Georgia Advancing Communities Together, Inc.
Our Power Our Voice, Inc.

**HAWAII**
Maui Economic Opportunity

**IDAHO**
208 Recovery
Boise City/Ada County Homeless Coalition
Our Path Home

**ILLINOIS**
Access Living of Metropolitan Chicago
Blue Cross Blue Shield Illinois
Carpenters Place
Community Action Partnership
Employment & Employer Services
Fox Valley Citizens for Peace & Justice
Housing Action Illinois
Illinois Alliance for Reentry and Justice, NFP
Illinois Valley Center for Independent Living
Joining Forces for Affordable Housing
Kenneth Young Center
Leah's House
Niles Township Government
Open Communities
The Inner Voice, Inc.
Treatment Alternatives for Safe Communities
We Build Lives Together

INDIANA
Coalition for Homelessness Intervention and Prevention
Fathers and Families Center
Greater Indianapolis Multifaith Alliance
Haven House Services
Prosperity Indiana

KENTUCKY
Community Housing Market Support Network, Inc.
Homeless and Housing Coalition of Kentucky
The Association of Community Ministries
Union Church
VOCAL-KY
Welcome House

LOUISIANA
Central Louisiana AIDS Support Services
lowernine.org
Neighborhood Development Foundation
Village Restore

MAINE
Maine Affordable Housing Coalition
Waldo Community Action Partners

MARYLAND
Advocacy and Training Center
Affordable Housing Conference of Montgomery County
Arts and Humanities Council of Montgomery County
Bridges to Housing Stability, Inc.
Disability Rights Maryland
New Vision House of Hope, Inc.
Project PLASE (People Lacking Ample Shelter and Employment)
Womens Housing Coalition

**MASSACHUSETTS**
Housing Families, Inc.
Massachusetts Housing & Shelter Alliance
Office of Housing Stability - Somerville
SEIU
Southeast Center for Independent Living
Western Massachusetts Network to End Homelessness

**MICHIGAN**
2Marines
Avalon Housing
Before, During, After Incarceration (BDAI)
Cherry Health
Family Youth Interventions
Friends Of Parkside
Goodwill Northern Michigan
Great lakes ADA center of Michigan
Macomb Community Action
Michigan Coalition Against Homelessness
The Salvation Army
Travelers Aid of Metropolitan Detroit
Travelers Aid Society of Metropolitan Detroit
Washington Boulevard Block Club
Washtenaw County Community Mental Health
Washtenaw County CPUSA

**MINNESOTA**
Agate Housing and Services
Churches United for the Homeless
Engage Community Services
HOME Line

**MISSOURI**
Burrell Behavioral Health
Empower Missouri
empower: abilities
Epiphany United Church of Christ
Jackson County Public Health
Jordan Valley Community Health
Journey to New Life
Justice and Service Commission of St. Pius V and St. Vincent de Paul Parishes
Services for Independent Living

MONTANA
Great Falls Pre-Release
Homeword, Inc.

NEVADA
Chicanos Por La Causa Nevada
Lived Experience Advisory Board - Reno
Lived X
Nevada Homeless Alliance

NEW HAMPSHIRE
Cross Roads House
Easter Seals
Granite State Organizing Project
Housing Action NH

NEW JERSEY
Camden Coalition
Collaborative Support Programs of New Jersey
Community Enterprises Corporation
Housing and Community Development Network of New Jersey
New Jersey Association of Mental Health and Addiction Agencies, Inc.
New Jersey Coalition to End Homelessness
Not In Our Town Princeton
Princeton Community Housing
Princeton Progressive Action Group
Reformed Church of Highland Park
Returning Citizen Support Group
Sanctuary Foundation For Veterans
The Supportive Housing Association of New Jersey
Tri Boro First Aid Squad
United Black Agenda
Westminster Presbyterian Church – Trenton

NEW MEXICO
Coalition for a Safer Albuquerque

NEW YORK
Albany Housing Coalition, Inc.
Better Business Bureau
CAMBA
CAMBA Housing Ventures
Concern Housing
Counseling with Love
Grassroots Artists Movement, Inc.
Hands Across Long Island, Inc.
Hudson River Housing
Independent Living, Inc.
Journey to Wellness Center
Lantern Community Services
Leviticus 25:23 Alternative Fund, Inc.
Life Unbolted, Inc.
Long Island Alliance
New York State Council of Churches
Nicolespeaking LLC
Sisters of Charity of New York
The Bridge, Inc.
The Exchange Blueprint LLC
The Fortune Society
Urban Pathways
Vital Strategies

NORTH CAROLINA
Disability Rights North Carolina
Good Shepherd Center
Mecklenburg County Government
Orange County Housing
Orange County Street Outreach, Harm Reduction and Deflection

NORTH DAKOTA
YWCA Cass Clay Shelter

OHIO
Alliance for Substance Abuse Prevention
Fair Housing Center for Rights & Research
Fair Housing Resource Center
KAV Health Group LLC
Mid-Ohio Board for an Independent Living Environment
The Ability Center of Greater Toledo
Youngstown Neighborhood Development Corporation

OREGON
Central City Concern
Hope Community Network  
Housing Oregon  
Residents Organizing for Change  
Sponsors, Inc.  
SquareOne Villages

**PENNSYLVANIA**  
Allegheny Valley Association of Churches  
Community Action Association of Pennsylvania  
Crawford County Drug and Alcohol  
Cumberland County Housing and Redevelopment Authorities  
HDC MidAtlantic  
Herode Beauvais LLC  
Housing Alliance of Pennsylvania  
Inclusion Home Care  
Kennett Area Community Service  
Landless Peoples Alliance  
Lawrence County Housing Authority  
Lehigh Valley Center for Independent Living  
LNF Media  
Mental Health Association of Northwestern Pennsylvania  
Pathways To Housing  
Pathways to Housing Pennsylvania  
Philadelphia Unemployment Project  
POWER Interfaith  
Rising Tide Partners  
South Kensington Community Partners  
The Birmingham Free Clinic  
The Cornerstone of Beaver County  
The Montco 30% Project  
UESF  
Women's Services, Inc.

**RHODE ISLAND**  
Community Care Alliance  
Rhode Island Coalition to End Homelessness

**SOUTH CAROLINA**  
Community Fresh Start of Upstate  
South Carolina Appleseed Legal Justice Center

**TENNESSEE**  
Clarksville Neighborhood & Community Services
Open Table Nashville  
Safe Haven Family Shelter  

TEXAS  
Center for Civic & Public Policy Improvement  
Collaborating Voices Foundation  
Ending Community Homelessness Coalition (ECHO) - Austin  
Front Steps  
Metrocare Services  
Northern Hills Homeowners Association  
Samaritan Inn  
Tarrant County Homeless Coalition  
Texas Homeless Network  
Tilbury Real Estate Advisors  

VERMONT  
John Graham Housing & Services  

VIRGINIA  
Carpenters Shelter  
Family Resource Center  
Nolef Turns, Inc.  
Symmetry Builders LLC  
Virginia Housing Alliance  
Waynesboro Area Refuge Ministry  

WASHINGTON  
Catholic Charities Eastern Washington  
Seattle King County Public Health Family Ways Program  
Tenants Union of Washington State  
Transitional Resources  

WEST VIRGINIA  
ACLU of West Virginia  

WISCONSIN  
Independence First  
JOSHUA (Justice Organization Sharing Hope & United for Action)  
NewBridge