

April 21, 2023

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

Docket No. FR-6250-P-01  
Affirmatively Furthering Fair Housing

Via Regulations.gov

I am writing to you on behalf of Compass Working Capital (Compass), a national, nonprofit, with a mission to end asset poverty for families with low incomes and narrow the racial and gender wealth divide, in response to HUD'S request for comments on its new proposed "Affirmatively Furthering Fair Housing" rule.

**Compass supports full enforcement of the Fair Housing Act and the implementation of the Affirmatively Furthering Fair Housing rule** as one mechanism to redress the stain of our national history of government sanctioned discrimination.

As an organization committed to working with families and individuals with low incomes to achieve financial security, Compass supports fair housing choice for those in greatest need. That is why HUD's Family Self Sufficiency (FSS) program is so important. As you know, FSS is woefully underutilized, and lack of awareness may be part of the reasons.

Compass stands ready to be an increasing partner in achieving HUD's equity agenda through the expansion of FSS and the implementation of performance measures including technical assistance where necessary to ascertain that public dollars are well spent, allow high-performing programs to grow, and identify under-performing programs in need of additional training and support.

The latest data from the Fed's Survey of Consumer Finances continue to show great racial and ethnic disparities in wealth position to which we should not grow accustomed. The data show that a typical white family holds eight times the wealth of a typical Black family and five times the wealth of a typical Hispanic family.

Wealth, not income, allows families to weather economic storms, including loss of income, periods of unemployment, health emergencies, and other circumstances. However, many of our nation's policies perpetuate wealth and asset divides by penalizing families receiving public benefits for building savings, including the requirement of low to no assets to meet eligibility criteria to qualify for safety net programs.

FSS is one of the best tools to enable people to set and reach financial goals, such as homeownership, education, starting a business, emergency savings and more.

We believe that including FSS as an integral part of AFFH Equity Plans provides a unique opportunity to increase FSS awareness and participation, to improve the financial footing of beneficiaries which also benefits program participants, and to strengthen relationships among stakeholders. Therefore, **Compass encourages HUD to incentivize program participants to include FSS as a component of their overall five-year Equity Plan.**

We appreciate your consideration. Please do not hesitate to reach out with questions at [mmorrislouis@compassworkingcapital.org](mailto:mmorrislouis@compassworkingcapital.org).

All the best,

A handwritten signature in black ink, appearing to read "Markita ML". The signature is fluid and cursive, with the first name "Markita" being more legible than the initials "ML".

Markita Morris-Louis  
Chief Executive Officer  
Compass Working Capital