

# National Fair Housing Alliance® Policy Priorities



Safeguarding Civil Rights and Advancing Fair Housing, Equitable Opportunities, and Thriving Communities:  
Policy Priorities for the 119<sup>th</sup> Congress & the Trump Administration (2025-2026)



Over the next two years, the National Fair Housing Alliance® (NFHA™) will prioritize these policy reforms to ensure fair and equitable housing opportunities for all. Access to a safe and affordable home near well-resourced schools, reliable transportation and internet, healthy foods, quality healthcare, fresh air, clean water, and living-wage jobs are basic to the American Dream and our nation’s future. With too many people struggling to make ends meet due to a lack of fair and affordable housing and growing racial and economic inequality, access to equitable housing opportunities can transform our society, increase prosperity, and create new promises for future generations. The Fair Housing Act was intended to remove all barriers to fair housing, whether from intentional bigotry or harmful practices and policies. Discrimination and inequality drain our economy. They distort markets, restrict resources, set up unbalanced opportunities, drive inflation, and limit productivity. By eliminating bias from our markets, we can ensure that they function fairly and allow us all to share in our nation’s collective economic growth and prosperity. We can build a world in which a person’s zip code does not determine their destiny and where the promises of our nation’s civil rights laws reach everyone. We hope you will join NFHA and its members in supporting the following fair and equitable housing priorities:

- 1 Preserve checks and balances**
- 2 Protect established rights and freedoms**
- 3 Promote fair and affordable housing for all households and communities**
- 4 Support robust civil rights protections for automated systems, including artificial intelligence (AI)**

## Preserve checks and balances

- DOJ, HUD, FHFA, Federal Financial Regulators, FTC, WH-OSTP, NIST. Defend career civil servants. Oppose efforts to re-classify civil servants as “Schedule F” employees who can be fired and replaced based on ideology rather than expertise. Support the appointment of individuals that reflect the nation’s diversity and who have demonstrated expertise in civil and human rights, fair housing, and fair lending.
- DOJ. Defend DOJ and the Civil Rights Division’s ability to enforce our nation’s fair housing and fair lending laws. Oppose efforts to diminish the independence of the DOJ; to limit the Civil Rights Division’s ability to protect vulnerable populations, including people of color, women, LGBTQ+ individuals, and families with children; to restrict the Civil Rights Division’s ability to efficiently settle cases; and to use the Civil Rights Division to prosecute state and local government, educational institutions, and private companies that have policies to promote Diversity, Equity, and Inclusion.
- HUD. Defend HUD’s vital mission to create strong, sustainable, inclusive communities; provide affordable housing opportunities; and enforce the Fair Housing Act. Oppose efforts to move HUD functions to other agencies, and to ultimately hollow out the agency, which will prevent it from ensuring that all people have a place to call home.
- CFPB. Defend the CFPB’s ability to protect consumers from discriminatory, unfair, or deceptive practices and to ensure fair and transparent markets for all consumers. Oppose efforts to abolish or hollow out the CFPB.

## Protect established rights and freedoms

- Congress. Protect robust enforcement of fair housing and fair lending laws through appropriate funding for local private nonprofit fair housing organizations and HUD: Fair Housing Initiatives Program (FHIP): \$125M; Fair Housing Assistance Program (FHAP): \$36.6M; HUD Fair Housing Equal Opportunity staff: \$153M.

- Congress. Promote stability in FHIP by adequately funding existing Qualified Fair Housing Enforcement organizations (QFHOs) and by creating new QFHOs in underserved areas to compensate victims of housing discrimination.
- Congress, DOJ, HUD, FHFA, Federal Financial Regulators. Protect individuals and communities from policies and practices that have a discriminatory effect by preserving the disparate impact theory of discrimination.
- Congress, DOJ, HUD, FHFA, Federal Financial Regulators. Protect fair housing training to prevent the millions of instances of housing discrimination that occur annually. Oppose efforts to reduce funding or otherwise eradicate fair housing training.
- DOJ, HUD, FHFA, Federal Financial Regulators. Ensure robust enforcement of the Fair Housing Act and the Equal Credit Opportunity Act (including using the disparate impact theory) to ensure fair housing, fair lending, fair automated systems, and Responsible AI so individuals and communities can achieve the American Dream.
- DOJ, HUD, FHFA, Federal Financial Regulators, Treasury. Protect equity initiatives to maintain U.S. strength as a global leader. Oppose efforts to reverse equity plans, to attack Diversity, Equity, and Inclusion and Environmental/Social/Governance initiatives, or to use a government employee's participation in equity initiatives as grounds for termination.
- HUD, CFPB. Protect LGBTQ+ rights. Oppose efforts to repeal the prohibition on discrimination on the basis of sexual orientation and gender identity.
- HUD, ICE. Protect immigrant rights and ensure the Fair Housing Act is fully enforced. Oppose efforts to remove immigrants from their homes and communities without due process (including through mass deportations and expanded Expedited Removal boundaries), to discriminate in foreign ownership of real estate (including for Chinese citizens), and to prohibit non-citizens from living in federally-assisted housing.

## Promote fair and affordable housing for all households and communities

- Congress. Promote passage of the [Downpayment Toward Equity Act](#): \$100 billion for first-generation homebuyers from a new HUD grant program to provide financial assistance for down payment and closing costs, interest rates reductions, shared equity homes subsidies, and home modifications for persons with disabilities to help individuals and families pursue their dreams of homeownership and its wealth-building benefits .
- Congress. Promote passage of the [Housing Crisis Response Act](#): \$150 billion to facilitate the development of fair and affordable housing and decrease housing costs to address the nation's fair and affordable housing crisis.
- Congress. Promote passage of the [Neighborhood Homes Investment Act](#) with fair housing principles: A new federal tax credit for the development and renovation of 500,000 housing units in distressed neighborhoods to revitalize urban, suburban, and rural communities hit hardest by the Great Recession.

### Affirmatively Furthering Fair Housing (Promoting Fully Inclusive Housing)

- All Agencies. Ensure that states receiving federal funds implement the Affirmatively Further Fair Housing (AFFH) provisions of the Fair Housing Act in their programs so everyone can live in a neighborhood with ample affordable and accessible housing options, quality schools, fresh air, clean water, good public transportation, living-wage jobs, quality healthcare, and healthy foods. Oppose efforts to repeal or undermine the AFFH provision.
- Treasury, EPA, DOT. Ensure federal infrastructure investments in the Inflation Reduction Act, Bipartisan Infrastructure Law, and CHIPS and Science Act comply with the Fair Housing Act's AFFH provision to ensure climate-mitigation efforts fairly reach all communities.

### Homeownership

#### *Homeownership Counseling*

- HUD-FHA. Protect housing counselors' ability to provide sound guidance to the underserved, including first-generation mortgage borrowers.

#### *Credit Reports and Scores*

- FHFA. Promote finalizing the implementation of new credit score models (FICO 10T and VantageScore 4.0) to increase credit access in underserved communities.
- CFPB. Protect the final rule banning medical debt in credit reports to ensure consumers can fairly access credit, especially in the Southern United States.

### *Appraisal*

- FHFA, GSEs, HUD (PAVE), ASC, TAF. Promote appraisal reform, including i) releasing property-level appraisal data, ii) reducing discretion to ensure fair and consistent outcomes, iii) increasing quality control and monitoring, iv) implementing sound methods to identify and prevent appraisal discrimination, v) requiring fair housing training developed by fair housing experts, vi) removing discriminatory barriers to the appraisal profession (including the supervisory appraiser requirement), vii) implementing fair automated valuation models, and viii) developing alternatives to the sales comparison approach. Oppose efforts to disband the federal Interagency Task Force on Property Appraisal and Valuation Equity (PAVE) and to repeal federal and TAF guidance issued to ensure fair and consistent appraisal outcomes for all consumers and communities.

### *Downpayment and Closing Costs; Special Purpose Credit Programs and First-Generation Homebuyers*

- FHFA, HUD, CFPB. Promote Special Purpose Credit Programs to ensure all borrowers can fairly access credit. Oppose efforts to repeal special-purpose credit authorities.
- FHFA, GSEs. Promote the adoption of a robust definition of “first-generation” to allow individuals and communities to access a downpayment, which is the primary barrier to homeownership.

### *Underwriting, Pricing, Redlining*

- Congress. Promote legislation to establish Community Reinvestment Act and fair lending supervision parity for insured credit unions to ensure all financial institutions serve the credit needs of the communities in which they operate.
- FHFA, GSEs, HUD. Promote the use of positive rental payment history and cash flow assessments in home mortgage underwriting to better assess a borrower’s risk.
- FHFA. Promote the elimination of Loan Level Price Adjustments to ensure creditworthy borrowers of color can fairly access mortgage loans and are not penalized for the system’s prior failures.

### *Servicing*

- HUD-FHA. To ensure borrowers have a fair opportunity to repay the mortgage, promote the preservation of the mortgage servicing reforms adopted during the COVID pandemic.

### *Climate and Homeowners Insurance*

- Congress, FHFA, HUD. Promote the adoption of equitable homeowners’ insurance underwriting and pricing to adapt to climate change and to preserve access to fairly priced insurance in all communities.

### *Renting*

- Congress. Promote increased funding for the Housing Choice Voucher Program to prevent individuals and families from becoming homeless and to ensure people can live in well-resourced communities.
- HUD. Support Secretary-initiated complaints to address source of income discrimination, which tends to harm families with children, women, LGBTQ+ individuals, and people of color.
- HUD. Support efforts to remove barriers to housing for justice-involved individuals.
- FHFA. Promote efforts to require the GSEs to prohibit source of income discrimination in buildings with GSE financing to ensure equitable housing opportunities for people with the greatest need.

### *Community Development and Zoning*

- Congress, HUD, FHFA, State and Local Government. Promote inclusive zoning, including for multi-family properties. Oppose efforts to focus exclusively on single-family zoning.

### *Language Access*

- CFPB. Promote finalizing the rule on language access in servicing to ensure consumers receive mortgage servicing information in the language they can understand.

### *Housing Finance System*

- Congress, FHFA. To ensure market stability and the GSEs’ fulfillment of their statutory fair housing and fair lending mission, support responsible oversight of the GSEs’ fair lending compliance, duty-to-serve goals, affordable housing goals, and equitable housing finance plans.

- Congress, FHFA. Promote responsible governance and increased funding for fair and affordable housing at the Federal Home Loan Banks, which receive substantial taxpayer subsidies.

## **Support robust civil rights protections for housing-related automated systems, including AI**

- Congress. To create Responsible AI policies for the benefit of society, support comprehensive AI legislation that includes i) a robust civil and human rights framework, ii) pre- and post-deployment impact assessments, , iii) an individual’s right to appeal an AI decision to a human, iv) model transparency and interpretability, v) repeal of the Communication Decency Act’s Section 230 immunity for violations of civil rights statutes, vi) subpoena power for DOJ’s Civil Rights Division, and vii) a private right of action. Oppose efforts to prohibit the use of the disparate impact theory and to establish a regulatory “sandbox” (which allows AI developers to experiment on consumers but avoid liability for harm).
- All Agencies. To preserve civil and human rights protections for all communities, support the responsible collection and use of demographic data. Oppose efforts to prohibit states from receiving federal housing-related funds and disaster relief funds unless they provide data to identify and surveil vulnerable populations, including women, immigrants, and LGBTQ+ individuals; to suppress the collection of race and other demographic data to monitor compliance with anti-discrimination laws; to repeal CFPB’s Dodd-Frank Section 1071 rule for the collection of small business data; and to add a citizenship question to the census.
- All Agencies. Support the adoption of fair automated systems related to housing. Oppose unfair tenant screening systems and unfair dynamic rental pricing systems.
- All Agencies. Support hiring staff with a combined skill set in automated systems and civil rights to ensure compliance with the nation’s civil rights laws, including fair housing laws.

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### **Acronym Appendix**

- ASC-Appraisal Subcommittee
- CFPB-Consumer Financial Protection Bureau
- DOJ-U.S. Department of Justice
- DOT-U.S. Department of Transportation
- EPA-Environmental Protection Agency
- Federal Financial Regulators -Consumer Financial Protection Bureau, Board of Governors of the Federal Reserve, Federal Deposit Insurance Corporation, National Credit Union Administration, Office of the Comptroller of the Currency
- FHFA-Federal Housing Finance Agency
- FTC-Federal Trade Commission
- GSEs-Government Sponsored Enterprises (Fannie Mae and Freddie Mac)
- HUD-U.S. Department of Housing and Urban Development
- HUD-FHA-HUD Federal Housing Administration
- ICE-U.S. Immigration and Customs Enforcement Agency
- NIST-National Institute of Standards and Technology
- TAF-The Appraisal Foundation
- Treasury-U.S. Department of Treasury
- WH-OSTP-White House Office of Science and Technology Policy