National Fair Housing Alliance
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August 14, 2026

The Honorable Maxine Waters
Ranking Member
U.S. House Financial Services Committee
2221 Rayburn House Office Building
Washington, DC, 20515-0543

Re: Request for Information on AI Risks and Modernization in Financial Services

Dear Ranking Member Waters,

The National Fair Housing Alliance (NFHA) thanks you for the opportunity to comment on the Request for Information on AI Risks and Modernization in Financial Services (RFI).[1]

NFHA leads a coalition that works to build inclusive, well-resourced, and resilient communities; expand equitable opportunities; and end housing discrimination. NFHA includes the Responsible AI Lab (RAIL), which envisions a housing future powered by Responsible AI and tomorrow's innovations, where security, safety, and trust are the cornerstones of every AI-driven decision.

NFHA has focused its response on just a few of the questions in this RFI. NFHA has produced many papers, comments, and testimony which are relevant to this RFI. These are collected in this document for reference.

I. Question 10: What kinds of explainability standards should Congress and/or regulators establish to allow affected individuals to understand how AI systems used by the financial services and housing industries reach their decisions, such as in underwriting decisions that may result in credit denials?

NFHA advocates for a consumer's right to explanations for automated decisions and for required testing that clarifies the reasoning and design behind AI systems.[2] Explainability standards for AI systems are not constraints, but essential safeguards.[3] Outcomes from a sound, trustworthy model should be explainable, and the structure of the model should

[1] Request for Information on AI Risks and Modernization in Financial Services (Jul. 7, 2026), available at: https://democrats-financialservices.house.gov/news/documentsingle.aspx?DocumentID=415374
[2] Lisa Rice, NFHA, Written Statement for Senate AI Forum: High Impact AI (Oct. 27, 2023), available at: Lisa-Rice-Written-Remarks-at-Senate-AI-Forum_10.27.2023-1.pdf
[3] NFHA, Comment Letter on White House Office of Science and Technology Policy Request for Information on Regulatory Reform on Artificial Intelligence (Oct. 26, 2025), available at: https://nationalfairhousing.org/wp-content/uploads/2025/11/NFHA-Comment-Letter-on-RFI-Regulatory-Reform-on-Artificial-Intelligence.pdf

enable that explainability.[4] Building on the current Equal Credit Opportunity Act (ECOA) requirements for financial services, establishing similar standards for AI systems not covered by ECOA, and adopting simple measures like lists of variables considered by AI models are all things Congress should consider.

In financial services, explainability for individual decisions is important for generating adverse action reasons in accordance with ECOA and Regulation B.[5] Regulation B requires that creditors provide adverse action notices to credit applicants that disclose the principal reasons for denial or adverse action. The disclosed reasons must relate to and accurately describe the factors the creditor considered. The complications raised by AI systems do not relieve creditors of their obligations to provide adverse action reasons that relate to and accurately describe the factors actually considered or scored by a creditor.[6] Creditors using AI/ML models must be able to generate adverse action notices that reliably produce consistent, specific reasons that consumers can understand.[7] For financial services, building on the existing framework under ECOA can be helpful. Unfortunately, the CFPB under the current administration has withdrawn prior guidance seeking to provide greater clarity to creditors on satisfying this ECOA requirement.[8]

For AI systems in financial services and housing not covered by ECOA, comparable legal requirements are necessary to ensure consumers are provided with specific reasons that are both actionable and accurate for decisions by AI systems.

Simple transparency and disclosure requirements like providing a public list of variables considered by an AI system when approving or disapproving a consumer, or maintaining a list for regulatory inspection, should also not be underestimated. Such requirements force AI system developers to grapple with fairness in AI system development before they are released for consumer use, enable regulators to identify AI systems for further scrutiny, and promote a free market where consumers and public discussion can evaluate whether certain variables are appropriate for decision-making by AI systems.

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[4] NFHA, Purpose, Process, and Monitoring (PPM) Framework for Auditing Algorithmic Systems (Feb. 17, 2022), available at: https://nationalfairhousing.org/wp-content/uploads/2022/02/PPM_Framework_Article_2-17-2022.pdf

[5] 15 U.S.C. 1691(d), 12 CFR 1002.9.

[6] NFHA, Comment Letter on Federal Banking Agencies' Request for Information and Comment on Financial Institutions' Use of Artificial Intelligence (July 1, 2021), available at: https://nationalfairhousing.org/wp-content/uploads/2021/07/Federal-Banking-Regulator-RFI-re-AI_Advocate-Letter_FINAL_2021-07-01.pdf

[7] Akinwumi, Merrill, Rice, Saleh, and Yap, Brookings Economic Studies, an AI fair lending policy agenda for the federal financial regulators (Dec. 2021), available at: https://nationalfairhousing.org/wp-content/uploads/2021/12/AI-Fair-Lending-Policy-Agenda-for-Federal-Regulators_Akinwumi_Merrill_Rice_Saleh_Yap_12-01-2021.pdf

[8] Consumer Financial Protection Circular 2022-03: Adverse Action Notification Requirements in Connection With Credit Decisions Based on Complex Algorithms, 87 FR 35864 (June 14, 2022); withdrawn on May 12, 2025, available at: https://www.federalregister.gov/documents/2025/05/12/2025-08286/interpretive-rules-policy-statements-and-advisory-opinions-withdrawal

II. Question 11: What pre-deployment and post-deployment controls should Congress and/or regulators require for AI models in connection with model inputs, weights, and other technical elements when used in the financial services and housing industries?

AI systems must align with applicable laws across their development lifecycle covering the following phases: design, model buildout, deployment, monitoring, and updates. This means ensuring that the systems are compliant with civil rights, fair housing, and consumer protection laws, including the prohibitions on disparate treatment, disparate impact, and proxy discrimination throughout the model's lifecycle.

NFHA has proposed a detailed framework for auditing algorithmic bias in housing and lending called Purpose, Process, and Monitoring (PPM), which establishes a roadmap for regulators, businesses, civil rights groups, academics, researchers, and other stakeholders to assess the fairness and efficacy of algorithmic systems to lessen or eradicate harmful effects on society.[9] Congress and regulators should use the PPM framework to ensure pre- and post-deployment controls are in place.

Important elements of the PPM framework include ensuring that:

- the selected model is the least discriminatory alternative (LDA) that meets the design objective in compliance with the Fair Housing Act, the Equal Credit Opportunity Act, 12 U.S.C. 4545 in the case of Fannie Mae and Freddie Mac, and other applicable civil rights law;
- any fairness constraint used at the data stage, model stage, or post-modeling stage should be evaluated at the model assessment stage;
- known limitations and assumptions of the model should be documented and reviewed;
- circumstances where the model may or may not be used outside the scope of its intended uses should also be documented and reviewed; and
- differences in patterns between the training and serving stages should be monitored and can inform when and how a model should be retrained.[10]

Independent, third-party audits and impact assessments both pre- and post-deployment are essential in high-stakes application areas like housing and financial services.[11]

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[9] NFHA, Purpose, Process, and Monitoring (PPM) Framework for Auditing Algorithmic Systems (Feb. 17, 2022), available at: https://nationalfairhousing.org/wp-content/uploads/2022/02/PPM_Framework_Article_2-17-2022.pdf

[10] Id.

[11] NFHA, Comment Letter on White House Office of Science and Technology Policy Request for Information on Regulatory Reform on Artificial Intelligence (Oct. 26, 2025), available at: https://nationalfairhousing.org/wp-content/uploads/2025/11/NFHA-Comment-Letter-on-RFI-Regulatory-Reform-on-Artificial-Intelligence.pdf; NFHA, Comment Letter on Federal Housing Finance Agency FinTech

III. Question 20: The Trump Administration has generally reduced enforcement and supervision efforts by agencies. What actions can Congress take to ensure there remains adequate oversight of third-party vendors used by financial services firms, particularly during periods of reduced agency enforcement and supervision capacity?

As NFHA President and CEO Lisa Rice explained when NFHA sued the CFPB for rollbacks of civil rights protections, "[w]hen [an] agency built to enforce civil rights and protect consumers walks away from the job, the rule of law remains."[12]

Because of the unprecedented rollbacks of federal agency enforcement and supervision of basic civil rights protections, Congress must do everything it can to ensure consumers' rights to fairness are still protected by the law. As documented in a recent study, federal regulator expectations and supervision undergirded much of financial services firms prior effective fair lending compliance work.[13] Without a similar incentive, that work is at risk of being lost. The result will be AI systems and traditional models with unaddressed discrimination being used on the public in financial services.

No one regulatory authority should have exclusive authority over an important area like AI systems in housing and financial services. Exclusive oversight can lead to potential regulatory capture and negative consequences for the public based on inaction. Further, ensuring consumers and private enforcers like qualified fair housing enforcement organizations can protect consumer rights, as well as have the necessary stable funding to act on consumers' behalf, is essential.

Preemption of state laws by federal authorities is a key factor in this issue, and lessons from the housing and financial crisis of 2008 are instructive. In the run up to the crisis, preemption authority inherent to some federal banking agencies was often aggressively used to prevent fair lending and consumer protection oversight by state governments, which led to disastrous results.[14] The Supreme Court addressed this issue specifically with

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Request for Information (Oct. 31, 2022), available at: https://nationalfairhousing.org/wp-content/uploads/2022/11/fhfa_fintech_RFI_comment_final.pdf.

[12] NFHA, National Fair Housing Alliance Sues CFPB and Acting Director Vought to Block Dismantling of 50 Years of Fair and Fair and Affordable Credit Protections (May 27, 2026), available at: https://nationalfairhousing.org/nfha-sues-cfpb-ecoa-rule-change/

[13] Emily Black, Miranda Bogen, Logan Koepke, Solon Barocas, Wesley Deng, and Mingwei Hsu. 2026. The Fair Lending Model: How the Longest-Running Algorithmic Fairness Programs Work in Practice. In The 2026 ACM Conference on Fairness, Accountability, and Transparency (FAccT'26), June 27–30, 2026, Montréal, Canada. ACM, New York, NY, USA, 28 pages. https://doi.org/10.1145/3805689.3812307

[14] Financial Crisis Inquiry Report, National Commission on the Causes of the Financial and Economic Crisis in the United States (Jan. 2011), available at: https://www.govinfo.gov/content/pkg/GPO-FCIC/pdf/GPO-FCIC.pdf

respect to fair lending investigation and enforcement in *Cuomo v. Clearing House Association*,[15] and the Dodd-Frank Act limited preemption for federal banking regulators.[16]

Unfortunately, the current administration appears to be using preemption in attempt to prohibit states from acting to provide guardrails for their residents for AI systems. In response to Executive Order 14365,[17] the Federal Trade Commission (FTC) recently proposed a policy statement purporting to preempt state laws which provide anti-bias guardrails on AI systems on a very thin legal and factual basis.[18] NFHA's comment on the proposal highlighted that: (i) the FTC had failed to make both the factual and legal case for deception under the FTC Act and used unreliable and flawed data to support its position; (ii) consumers expect and support anti-bias guardrails on AI systems; (iii) the FTC's case for preemption is legally deficient; and (iv) state fair housing and fair lending laws have coexisted with Section 5 of the FTC Act for decades.[19]

Private enforcement by individuals and organizations that protect consumers' rights is also essential in an environment of reduced agency enforcement and supervision. Individuals have private rights of action under the Fair Housing Act and ECOA, which are essential enforcement tools.[20] Yet complex discrimination by AI systems is difficult for individual consumers to detect and enforce on their own. Organizations acting as private enforcers on their behalf are an essential component to ensuring compliance. Qualified fair housing enforcement organizations,[21] traditionally funded through the Fair Housing Initiatives Program (FHIP),[22] play a key role in detecting and remedying discrimination related to AI systems. In making the FHIP program permanent in statute, Congress recognized "the proven efficacy of private nonprofit fair housing enforcement organizations and community-based efforts makes support for these organizations a necessary component of the fair housing enforcement system."[23] Despite bipartisan support for the program, the current administration has continued a pattern of actions to defund these organizations

[15] *Cuomo v. Clearing House Assn., L. L. C.*, 557 U.S. 519 (2009)
[16] *See, e.g.*, Arthur E. Wilmarth Jr., The Dodd-Frank Act's Expansion of State Authority to Protect Consumers of Financial Services, 36 J. Corp. L. 893 (2011), available at: https://scholarship.law.gwu.edu/cgi/viewcontent.cgi?article=2167&context=faculty_publications
[17] E.O. 14365, Ensuring a National Policy Framework for Artificial Intelligence, 90 FR 58499, 58499 (Dec. 11, 2025), available at: https://www.federalregister.gov/documents/2025/12/16/2025-23092/ensuring-a-national-policy-framework-for-artificial-intelligence
[18] FTC, Policy Statement Concerning the Suppression of Accuracy in Artificial Intelligence Systems, 91 FR 41638 (Jul. 7, 2026), available at: https://www.federalregister.gov/documents/2026/07/07/2026-13628/policy-statement-concerning-the-suppression-of-accuracy-in-artificial-intelligence-systems
[19] NFHA, Comment on FTC Proposed Policy Statement on Deception and AI Systems (Jul. 31, 2026), available at: https://www.regulations.gov/comment/FTC-2026-0859-0241
[20] 15 U.S.C. 1691e, 42 U.S.C. 3613.
[21] 24 CFR 125.103.
[22] 42 U.S.C. 3616a.
[23] The Housing and Community Development Act of 1992 amended the FHA to include FHIP. See Pub. L. No. 102-550, § 905, 106 Stat. 3868-3872 (Oct. 28, 1992) (adding 42 U.S.C. § 3616a to the FHA, 42 U.S.C. §§ 3601–3619).

against the will of Congress and the law.[24] Without well-funded QFHOs, it will be even more difficult for consumers to enforce the guardrails that exist under current law for AI systems.

NFHA and its members' experience in enforcing Fair Housing Act compliance in algorithmic bias cases demonstrates the effectiveness of QFHOs in filling in the gaps left by regulators. In 2019, NFHA and several other organizations reached a historic settlement relating to algorithmic bias in Facebook's advertising platform.[25] In another recent matter, NFHA and the Fair Housing Rights Center in Southeastern Pennsylvania (FHRC) and the Housing Equality Center of Pennsylvania (HECP) filed a complaint against a national tenant screening software company that was violating the law by restricting access for housing choice voucher holders.[26] This complaint resulted in a settlement with relief in the public interest including correcting the policies at issue.[27]

IV. Question 22: What liability, if any, should be applied to financial institutions and/or third-party service providers used by financial institutions to the extent the use of AI contributes to violations of Federal law or regulation, especially where consumers are harmed? What law(s) should be amended to create this liability framework? Should there be safe harbors provided in certain circumstances? Please explain why any proposed changes may be warranted.

Third-party AI systems can drive discrimination, and there is no basis for immunizing them from existing fair housing and fair lending laws, or from future laws that govern AI systems.[28]

Civil rights, fair housing, and consumer protection laws must apply to every actor in the AI ecosystem, with clear legal responsibilities and liability allocation based upon roles. This includes developers, deployers, third-party vendors, and users. In addition, policymakers

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[24] Letter from Senators Booker, Van Hollen, Warnock et al. to the Honorable Scott Turner (Aug. 6, 2026), available at: https://www.booker.senate.gov/imo/media/doc/fair_housing_letter_hud_8626.pdf

[25] NFHA, Civil Rights Advocates Settle Lawsuit with Facebook: Transforms Facebook's Platform Impacting Millions of Users (Mar. 14, 2019), available at: https://nationalfairhousing.org/facebook-settlement/

[26] NFHA, NFHA and Fellow Fair Housing Advocates File Complaint Against National Tenant Screening Software Company (May 14, 2024) available at: https://nationalfairhousing.org/nfha-and-fellow-fair-housing-advocates-file-complaint-against-national-tenant-screening-software-company/

[27] NFHA, Fair Housing Organizations and Tenant Turner Reach Agreement to Strengthen Fair Housing Practices in Rental Technology Platform (Jul. 01, 2026), available at: https://nationalfairhousing.org/fair-housing-organizations-and-tenant-turner-reach-agreement-to-strengthen-fair-housing-practices-in-rental-technology-platform/

[28] Akinwumi, Merrill, Rice, Saleh, and Yap, Brookings Economic Studies, an AI fair lending policy agenda for the federal financial regulators (Dec. 2021), available at: https://nationalfairhousing.org/wp-content/uploads/2021/12/AI-Fair-Lending-Policy-Agenda-for-Federal-Regulators_Akinwumi_Merrill_Rice_Saleh_Yap_12-01-2021.pdf

should require accessible records that explain what an AI system was trained on, how it was built, and how it's monitored, so liability can be fairly assigned across roles.

Existing federal laws already apply to AI systems, including the Fair Housing Act, the Equal Credit Opportunity Act, and 12 U.S.C. 4545 in the case of Fannie Mae and Freddie Mac. Many of the traditional rules of liability allocation common to all forms of private business remain applicable. NFHA and its members' experience in enforcing Fair Housing Act compliance in algorithmic bias cases discussed above under Question 20 demonstrates the importance of having good liability rules, so that the legal system can function properly to ensure consumers' rights are respected.

V. Question 34: What actions should the FHFA and other similar agencies take to oversee PropTech and ensure its compliance with fair lending laws and regulations?

As documented in the Government Accountability Office's (GAO) report, FHFA and other agencies have rescinded relevant guidance, curtailed regulations that govern PropTech, and ended supervision and enforcement that would ensure PropTech is compliant with fair lending laws and regulations.[29]

FHFA's curtailment in fair lending was so significant that GAO issued a recommendation that the Director of FHFA provide written direction to Fannie Mae and Freddie Mac clarifying how they are to comply with fair lending requirements and how FHFA will supervise their compliance, a recommendation that FHFA neither agreed nor disagreed with and that remains open as of the date of this comment letter.[30]

FHFA's rescission of fair lending and consumer guidance and requirements that impact Fannie Mae, Freddie Mac, and the Federal Home Loan Banks' development and use of PropTech has included rescission and repeal of:

- FHFA Order No. 2025-OR-B-1;[31]
- FHFA Order No. 2025-OR-FHLMC-1;[32]
- FHFA Order No. 2025-OR-FNMA-1;[33]

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[29] GAO, Property Technology for Homebuying, Products Present Benefits and Risks Amid Evolving Federal Oversight (Sep. 2025), available at: https://www.gao.gov/assets/gao-25-107201.pdf
[30] *Id.*
[31] https://web.archive.org/web/20250223210556/https:/www.fhfa.gov/document/fair-lending-reporting-order-fhlb.pdf
[32] https://web.archive.org/web/20250223210600/https://www.fhfa.gov/document/fair-lending-reportingorder-freddie-mac.pdf
[33] https://web.archive.org/web/20250223145729/https://www.fhfa.gov/sites/default/files/2023-04/FRE-FinalOrder-re-Fair-Lending-Reporting.pdf

- FHFA Order No. 2021-OR-FHLMC-2;[34]
- FHFA Order No. 2021-OR-FNMA-2;[35]
- FHFA Advisory Bulletin AB 2024-07;[36]
- FHFA Advisory Bulletin AB 2024-06;[37]
- FHFA Advisory Bulletin AB 2023-05;[38] and
- 12 CFR part 1293.[39]

Collectively, these policies required Fannie Mae, Freddie Mac, and the Federal Home Loan Banks to comply with applicable fair lending and consumer protection laws, made those laws enforceable through FHFA's authorities, established practical guidance and supervisory expectations for compliance, required regular information and reporting by the companies, required the companies to engage in pro-active planning and efforts to improve fair lending and consumer protection, and required officers of the company to certify compliance with the law on a regular basis.

Other agencies have engaged in similar rescissions and rollbacks of necessary tools for overseeing PropTech's compliance with fair lending laws. The CFPB has withdrawn a number of important guidance documents relevant to PropTech,[40] and has amended Regulation B to remove references to disparate impact.[41] NFHA commented on the flaws with CFPB's proposal including its negative impacts on the ability to address algorithmic bias,[42] and NFHA is currently challenging this removal in court.[43]

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[34] https://web.archive.org/web/20250223145727/https://www.fhfa.gov/sites/default/files/2023-04/FNM-FinalOrder-re-Fair-Lending-Reporting.pdf

[35] https://www.fhfa.gov/sites/default/files/2023-04/FNM-Final-Order-re-Fair-Lending-Reporting.pdf

[36] https://web.archive.org/web/20250310220420/https://www.fhfa.gov/advisory-bulletin/ab-2024-07

[37] https://web.archive.org/web/20250310220422/https://www.fhfa.gov/advisory-bulletin/ab-2024-06

[38] https://web.archive.org/web/20250310220422/https://www.fhfa.gov/advisory-bulletin/ab-2023-05

[39] FHFA, Fair Lending, Fair Housing, and Equitable Housing Finance Plans, 91 FR 5278 (Feb. 6, 2026), available at: https://www.federalregister.gov/documents/2026/02/06/2026-02325/fair-lending-fair-housing-and-equitable-housing-finance-plans

[40] https://www.consumerfinance.gov/compliance/guidance/withdrawn-guidance/

[41] CFPB, Equal Credit Opportunity Act (Regulation B), 91 FR 21620 (Apr. 22, 2026), available at: https://www.federalregister.gov/documents/2026/04/22/2026-07804/equal-credit-opportunity-act-regulation-b

[42] NFHA, Comments on Equal Credit Opportunity Act (Regulation B) Proposed Rule (Dec. 15, 2025), available at: https://nationalfairhousing.org/wp-content/uploads/2025/12/Comments-on-Equal-Credit-Opportunity-Act-Regulation-B-Proposed-Rule.pdf

[43] NFHA, National Fair Housing Alliance Sues CFPB and Acting Director Vought to Block Dismantling of 50 Years of Fair and Fair and Affordable Credit Protections (May 07, 2026), available at: https://nationalfairhousing.org/nfha-sues-cfpb-ecoa-rule-change/

The FTC has issued a proposed policy statement asserting a sweeping but thinly supported theory of preemption over state discrimination laws which apply to PropTech.[44] As discussed above in Question 20, NFHA has commented on the significant flaws in the FTC's proposal. FTC issued a policy statement without opportunity for public comment that it would no longer pursue disparate impact under ECOA, and would no longer pursue discrimination under Section 5 of the FTC Act.[45]

HUD has rescinded its Guidance on Application of the Fair Housing Act to the Advertising of Housing, Credit, and Other Real Estate-Related Transactions through Digital Platforms.[46] HUD has also proposed to remove references to disparate impact in its regulations for the Fair Housing Act.[47] NFHA has commented opposing this change, and NFHA's comment highlights the negative effects the proposal will have on the ability to address algorithmic bias.[48]

Congress must engage in strong oversight of these agencies to ensure they restore the tools necessary to effectively oversee PropTech's compliance with fair lending laws.

VI. List of NFHA Resources Relevant to the RFI

The following NFHA resources are relevant to the questions raised by the RFI:

- NFHA, Civil Rights Advocates Settle Lawsuit with Facebook: Transforms Facebook's Platform Impacting Millions of Users (Mar. 14, 2019), available at: https://nationalfairhousing.org/facebook-settlement/
- NFHA, Comment Letter on Federal Banking Agencies' Request for Information and Comment on Financial Institutions' Use of Artificial Intelligence (July 1, 2021), available at: https://nationalfairhousing.org/wp-content/uploads/2021/07/Federal-Banking-Regulator-RFI-re-AI_Advocate-Letter_FINAL_2021-07-01.pdf
- NFHA, Draft NIST Special Publication 1270 – A Proposal for Identifying and Managing Bias within Artificial Intelligence (Sep. 10, 2021), available at: https://nationalfairhousing.org/wp-content/uploads/2022/12/NFHA-et-al-Comment-on-NIST-Proposal-re-Bias-in-AI_FINAL_2021-09-10.pdf

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[44] FTC, Policy Statement Concerning the Suppression of Accuracy in Artificial Intelligence Systems, 91 FR 41638 (Jul. 7, 2026), available at: https://www.federalregister.gov/documents/2026/07/07/2026-13628/policy-statement-concerning-the-suppression-of-accuracy-in-artificial-intelligence-systems

[45] FTC, FTC Ditches "Disparate Impact," » (Aug. 7, 2026), available at: https://www.ftc.gov/news-events/news/press-releases/2026/08/ftc-ditches-disparate-impact

[46] HUD, Notification of Withdrawal of Fair Housing and Equal Opportunity Guidance Document, 91 FR 17291 (Apr. 6, 2026), available at: https://www.govinfo.gov/content/pkg/FR-2026-04-06/pdf/2026-06624.pdf

[47] HUD, HUD's Implementation of the Fair Housing Act's Disparate Impact Standard, 91 FR 1475 (Jan. 14, 2026), available at: https://www.govinfo.gov/content/pkg/FR-2026-01-14/pdf/2026-00590.pdf

[48] NFHA, Comment on HUD's Implementation of the Fair Housing Act's Disparate Impact Standard Proposed Rule (Feb. 13, 2026), available at: https://nationalfairhousing.org/wp-content/uploads/2026/02/HUD-DI-Comment-Letter__2026_02_13_FINAL_for-submission.pdf

- Akinwumi, Merrill, Rice, Saleh, and Yap, Brookings Economic Studies, an AI fair lending policy agenda for the federal financial regulators (Dec. 2021), available at: https://nationalfairhousing.org/wp-content/uploads/2021/12/AI-Fair-Lending-Policy-Agenda-for-Federal-Regulators_Akinwumi_Merrill_Rice_Saleh_Yap_12-01-2021.pdf
- NFHA, Purpose, Process, and Monitoring (PPM) Framework for Auditing Algorithmic Systems (Feb. 17, 2022), available at: https://nationalfairhousing.org/wp-content/uploads/2022/02/PPM_Framework_Article_2-17-2022.pdf
- NFHA, NFHA Comment on the CFPB Outline for the Small Business Advisory Review Panel for the Automated Valuation Model Rulemaking (May 13, 2022), available at: https://nationalfairhousing.org/wp-content/uploads/2022/05/NFHA-et-al-Comment-Letter_CFPB-re-AVMs_05-13-2022_FINAL.pdf
- NFHA, Comment Letter on NSTC Engagement and Accountability RFI (Oct. 3, 2022), available at: https://nationalfairhousing.org/wp-content/uploads/2022/11/NFHA-comments-on-OSTP-RFI-on-data-for-racial-equity-10.3.22.pdf
- NFHA, Comment Letter on Federal Housing Finance Agency FinTech Request for Information (Oct. 31, 2022), available at: https://nationalfairhousing.org/wp-content/uploads/2022/11/fhfa_fintech_RFI_comment_final.pdf
- NFHA and TechEquity Collaborative, Privacy, Technology, and Fair Housing: A Case for Corporate and Regulatory Action (Aug. 2023), available at: https://nationalfairhousing.org/wp-content/uploads/2023/08/NFHA-TechEquity-Paper-final.pdf
- NFHA, Comment on Quality Control Standards for Automated Valuation Models (Aug. 21, 2023), available at: https://nationalfairhousing.org/wp-content/uploads/2023/09/final_NFHA-NCLC-Comment-Re-Quality-Control-Standards-for-Automated-Valuation-Models-8.21.2023.pdf
- Lisa Rice, NFHA, Written Statement for Senate AI Forum: High Impact AI (Oct. 27, 2023), available at: Lisa-Rice-Written-Remarks-at-Senate-AI-Forum_10.27.2023-1.pdf
- NFHA, NFHA and Fellow Fair Housing Advocates File Complaint Against National Tenant Screening Software Company (May 14, 2024) available at: https://nationalfairhousing.org/nfha-and-fellow-fair-housing-advocates-file-complaint-against-national-tenant-screening-software-company/
- NFHA, From Policy to Practice: Essential Competencies for Federal Chief AI Officers (July 2024), available at: https://nationalfairhousing.org/wp-content/uploads/2024/08/From-Policy-to-Practice-Essential-Competencies-for-Federal-Chief-AI-Officers-FINAL.pdf
- Lam, Petrosyan, Akinwumi, Results from NIST's GenAI Text-to-Text (T2T) Discriminator Challenge (2024), available at: https://nationalfairhousing.org/wp-content/uploads/2024/10/BIAS18_report_DESIGNED.Oct22.pdf
- Michael Akinwumi, "AI Governance: Overcoming Policy Barriers to Fairness and Privacy" (2025). *Connecticut Law Review*. 646. https://digitalcommons.lib.uconn.edu/law_review/646

- NFHA, Comment Letter on Request for Information on the Development of an Artificial Intelligence (AI) ActionPlan (Mar. 15, 2025), available at: https://nationalfairhousing.org/wp-content/uploads/2025/03/NFHA_RFI-on-AI-Action-Plan_03-15-2024-1.pdf
- NFHA, Comment Letter on White House Office of Science and Technology Policy Request for Information on Regulatory Reform on Artificial Intelligence (Oct. 26, 2025), available at: https://nationalfairhousing.org/wp-content/uploads/2025/11/NFHA-Comment-Letter-on-RFI-Regulatory-Reform-on-Artificial-Intelligence.pdf
- Samad, Akinwumi, Khan, Mugge-Durum, Ogundimu, Selecting for Less Discriminatory Algorithms: A Relational Search Framework for Navigating Fairness-Accuracy Trade-offs in Practice (Nov. 2025), available at: https://rail.nationalfairhousing.org/wp-content/uploads/2026/08/2506.01594v2.pdf
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- NFHA, Coalition Comment Letter on GSA's Draft AI Procurement Clause: "Basic Safeguarding of Artificial Intelligence Systems," (Mar. 31, 2026), available at: https://rail.nationalfairhousing.org/wp-content/uploads/2026/04/Coalition-Comment-on-Proposed-GSAR-552.239-7001-—-MAS-Refresh-31-AI-Clause_04-03-2026.pdf
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NFHA thanks you for the opportunity to comment on the Request for Information on AI Risks and Modernization in Financial Services and looks forwards to working with the Ranking Member and the entire Committee on these important issues.

Sincerely,

National Fair Housing Alliance