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Re: Comment in Opposition to OCC and FDIC Notice of Proposed Rulemaking on Community Reinvestment Act Regulations [OCC Docket ID OCC-2026-0694; RIN 1557-AF57] [FDIC RIN 3064-AG31]

The National Fair Housing Alliance (NFHA) and the undersigned civil rights, housing, and consumer advocacy organizations thank you for the opportunity to comment on the Federal Deposit Insurance Corporation (FDIC) and the Office of the Comptroller of the Currency's (OCC) (the agencies) Community Reinvestment Act Regulations (CRA Proposal).¹ NFHA leads a coalition that works to build inclusive, well-resourced, and resilient communities; expand equitable opportunities; and end housing discrimination.

The CRA Proposal fails to meet the important purposes of the Community Reinvestment Act (CRA) in several respects, would reduce lending in underserved low- and moderate-income communities, including communities of color, discourages support for community nonprofits, gives banks a pass on discriminatory and illegal credit practices like redlining, and does not incorporate special purpose credit programs (SPCP) which are a highly-effective way to address the goals of the CRA.

I. The CRA Was Enacted to Combat Redlining and Require Bank Support for Low- and Moderate-Income Communities and Communities of Color

¹ FDIC and OCC, Community Reinvestment Act Regulations, 91 FR 52114 (Aug. 12, 2026), available at: <https://www.govinfo.gov/content/pkg/FR-2026-08-12/pdf/2026-16454.pdf>



The CRA² was passed as part of a series of laws including the Fair Housing Act of 1968 (Fair Housing Act),³ the Equal Credit Opportunity Act of 1974 (ECOA),⁴ and the Home Mortgage Disclosure Act of 1975 (HMDA)⁵ that reflected a continuing Congressional effort to address racial and other forms of discrimination, expand opportunities for all people and all communities in the United States, and redress the harms caused by discrimination and redlining in both the private sector and government policy. These laws were designed to operate in concert and must be interpreted to work together.

The CRA's sponsor in the Senate, William Proxmire, made clear the intention of the legislation to address redlining:

By redlining let me make it clear what I am talking about. I am talking about the fact that banks and savings and loans will take their deposits from a community and instead of reinvesting them in that community, they will actually or figuratively draw a red line on a map around the areas of the city, sometimes in the inner city, sometimes in the older neighborhoods, sometimes ethnic and sometimes black, but often encompassing a great area of their neighborhood.⁶

The text of the CRA effectuates this intent through broad language. While much of the implementation of CRA through regulation, guidance, and examinations is based on a bank's service to low- and moderate-income communities, this is only a part of the intended scope and reach of the statute. For example, agencies are required to "assess the institution's record of meeting the credit needs of its *entire community, including* low- and moderate-income neighborhoods"⁷ The Congressional findings and statement of purpose in the CRA reference the needs of *communities* multiple times.⁸ Indeed, banks have a "continuing and affirmative obligation" to meet the needs of their communities, and it is the purpose of the CRA to require the agencies to use their authority to encourage banks to meet their communities' needs.⁹ This broad reading has been acknowledged by the OCC¹⁰ and the FDIC.¹¹ Congress's other actions surrounding the CRA also make this

² 12 U.S.C. § 2901 *et seq.*

³ 42 U.S.C. § 3601 *et seq.*

⁴ 15 U.S.C. § 1691 *et seq.*

⁵ 12 U.S.C. § 2801 *et seq.*

⁶ 123 Cong. Rec. 17630 (June 6, 1977).

⁷ 12 U.S.C. § 2903(a)(1).

⁸ 12 U.S.C. § 2901(a).

⁹ 12 U.S.C. § 2901(a)(3).

¹⁰ OCC, Policies and Procedures Manual, 5000-43: Impact of Evidence of Discriminatory or Other Illegal Credit Practices on Community Reinvestment Act Ratings, issued through OCC Bulletin 2018-23 (Aug. 15, 2018), available at: <https://www.occ.gov/news-issuances/bulletins/2018/bulletin-2018-23.html>

¹¹ FDIC, Consumer Compliance Examination Manual, XI-1 Community Reinvestment Act (July 2026), available at: <https://www.fdic.gov/consumer-compliance-examination-manual/community-reinvestment-act-xi-1-redline-updates-july-2026>

broad reading clear. Congress has required reports from the Board of Governors of the Federal Reserve System on how banks are serving racial minority neighborhoods in their lending.¹² Further, in 1988 Congress amended the existing duty of all agencies to affirmatively further fair housing in their programs and activities to make clear that it includes regulatory and supervisory authority over banks:

All executive departments and agencies shall administer their programs and activities relating to housing and urban development (*including any Federal agency having regulatory or supervisory authority over financial institutions*) in a manner affirmatively to further the purposes of [the Fair Housing Act]¹³

This broad interpretation has been reaffirmed and acknowledged by the officials charged with implementing the law. The 1995 testimony of then-FDIC Chairman Ricki Tigert Helfer provides one example:

Concern about redlining, in large part, motivated enactment of the CRA in 1977. As mentioned earlier, access to credit is essential to the financial viability of every community; this viability is threatened to the extent that artificial limits based on geographic location, demographic composition, or personal attributes not relevant to lending risk are imposed by lenders. The CRA is a statute that promotes community development by stipulating that financial institutions should serve the credit needs of their entire communities. It complements, but is different than federal fair lending laws.¹⁴

While fair lending laws forbid unlawful discriminatory practices against communities of color, the CRA was designed as a complement to ensure that banks took clear and deliberate action to serve communities of color as well as low- and moderate-income neighborhoods.

II. The CRA Proposal Would Create Higher Thresholds for Bank Coverage, Leading to Fewer Loans to Underserved Communities and Communities of Color

The CRA Proposal would raise the asset thresholds for banks, leading to more banks falling into lower tiers with less required of them. The threshold for large banks would be raised to \$10 billion or \$30 billion. This would lead to a reduction from the current 661 large banks to 165 under the \$10 billion threshold, or 72 under the \$30 billion threshold. Former large

¹² 12 U.S.C. § 2901 note (referencing Pub. L. 102-550, title IX, § 910 (Oct. 28, 1992), 106 Stat. 3874).

¹³ 42 U.S.C. § 3608(d).

¹⁴ FDIC, Testimony of Chairman Ricki Tigert Helfer before the Subcommittee on Financial Institutions and Consumer Credit of the Committee on Banking and Financial Services (Mar. 8, 1995), available at: archive.fdic.gov/view/12097/fdic_12097_DS1.pdf

banks would no longer be required to report aggregate community development lending, have separate assessments of community development lending from community development investments, and would not have to report small business and small farm lending.¹⁵ The CRA Proposal would also raise the small bank threshold from \$442 million to \$1 billion, reclassifying more than 1,000 banks as small banks. They would no longer be subject to more strenuous CRA assessment.¹⁶

By reducing CRA requirements for many banks, the CRA Proposal will likely result in a reduction of effort by banks to meet the needs of their communities, and reduce their incentives to engage in community development lending, investments, and grants, and to avoid discriminatory or other illegal credit practices. This does not serve the needs of communities throughout the nation, including communities of color, that desperately need more support and resources. This is especially true as bank branches often serve lower income White communities at greater rates than upper income Black communities and are closed more often in Black communities.¹⁷

III. The CRA Proposal Discourages Support for Community Nonprofits and Fair Housing Agencies that Serve Underserved Communities, including Communities of Color

The CRA Proposal would limit CRA-eligible grants to nonprofits. All banks would be subjected to a new community development primary purpose test and large banks would be subjected to a test requiring that no more than 15 percent of a grant or donation go to indirect or administrative costs, a standard often used in federal government grants.¹⁸ The current regulations contain no such requirements.

The flexibility of CRA-eligible grants enables banks to meet the purposes of CRA by using grant funds to reach parts of their community that they may have difficulty reaching

¹⁵ Walsh, Belsky, Goodman, and Nilsson, Urban Institute, Proposed Changes to the Community Reinvestment Act Could Weaken Incentives for Banks to Invest in Low- and Moderate-Income Communities (Sep. 29, 2026), available at: <https://www.urban.org/urban-wire/proposed-changes-community-reinvestment-act-could-weaken-incentives-banks-invest-low-and>

¹⁶ *Id.*

¹⁷ Lananh Nguyen, Reuters, Bank branch openings in U.S. leave behind minority neighborhoods – study (Sept. 29, 2022), available at: <https://www.reuters.com/business/finance/bank-branch-openings-us-leave-behind-minority-neighborhoods-study-2022-09-29/>; Alaina Barca and Harry Hou, Federal Reserve Bank of Philadelphia, U.S. Bank Branch Closures and Banking Deserts (Feb. 2024), available at: <https://www.philadelphiafed.org/community-development/credit-and-capital/u-s-bank-branch-closures-and-banking-deserts>; Jared Wadley, Race guides location of Detroit-area financial institutions (Nov. 21, 2024), available at: <https://record.umich.edu/articles/race-guides-location-of-detroit-area-financial-institutions/>

¹⁸ 2 CFR 200.414(f).

themselves, especially as banks receive significant public subsidies. Small nonprofits are often the best able to do this, especially for large banks with national footprints that may struggle with meeting intensely local needs. The CRA Proposal actually runs counter to these needs, because its standards would largely support a smaller set of nonprofits (mostly large ones). An analysis by the MacArthur Foundation found that 29 percent was the minimum indirect cost rate associated with financially healthy organizations.¹⁹ Government grant standards tend to support larger nonprofits.²⁰ The OCC acknowledged that “smaller nonprofits, newer organizations, or organizations serving hard-to-reach populations may face greater difficulty providing the documentation or operating-cost information needed to support CRA consideration.”²¹ The overall goals of the CRA Proposal are stated to be deregulatory,²² yet this area of the rule substantially increases compliance burden.

Troublingly, Comptroller Gould has stated that the intention behind these changes is to “help ensure the CRA is no longer used . . . as a funding mechanism for activist NGO networks under the guise of community development.”²³ Additional requirements under the CRA Proposal are troubling in light of these statements, including the agencies’ statement that they would maintain a public database of large banks’ grants,²⁴ and the creation of a process whereby banks are encouraged to submit grants for pre-review by the agencies, and are then required to accept any conditions or limitations imposed by the agency on the grant for it to be CRA-eligible.²⁵

Collectively, these proposals could co-opt CRA-eligible grantmaking by banks into an arm of the administration that could be used to target politically disfavored community groups and the people they serve, as Comptroller Gould has indicated is the intention. This would further put underserved communities at risk, while opening up the specter that the CRA-grant process would be used to channel funds from large banks to favored nonprofits. Regulatory regimes like this, where public standards are imposed but private exceptions granted, are often the hallmark of government policies that lead to unlawful discrimination

¹⁹ MacArthur Foundation, Indirect Cost Policy, available at: <https://www.macfound.org/about/our-policies/indirect-cost-policy/>

²⁰ Urban Institute, Nonprofit Trends and Impacts 2021–2023 National Findings on Government Grants and Contracts from 2019 to 2023 (Oct. 2024), available at: https://www.urban.org/sites/default/files/2024-10/Nonprofit_Trends_and_Impacts_2021-2023_National_Findings_on_Government_Grants_and_Contracts.pdf

²¹ CRA Proposal at 52165.

²² CRA Proposal at 52178.

²³ <https://x.com/USComptroller/status/2083220998044676100>

²⁴ CRA Proposal at 52148.

²⁵ CRA Proposal at 52120, 52184.

in violation of the Constitution.²⁶ They enable arbitrary and capricious decision-making in violation of legal norms and potentially unconstitutional viewpoint discrimination.²⁷ This would enable a CRA grant regulatory regime where the needs of all communities, including communities of color, could go unmet while funds are steered to favored causes.

Collectively, the CRA Proposal's new grant standards will discourage banks from supporting organizations that promote fair housing and fair lending or that support programs that address the credit needs of communities of color. As noted, this is contrary to law and inconsistent with the basic purposes of the CRA as discussed in part I.

IV. The CRA Proposal Gives Banks a Pass on Unlawful Discrimination, Redlining, and Consumer Protection

Under current CRA regulations, banks may have their CRA rating downgraded based on evidence of discriminatory or other illegal credit practices.²⁸ This is sensible for a law enacted to combat redlining and require bank support for communities of color, not simply low- and moderate-income communities as discussed in part I. A bank that is not complying with fair housing, fair lending, or consumer protection law is by definition not serving the needs of the “entire community,”²⁹ regardless of how well it is meeting other tests related to low- and moderate-income people in CRA regulations.

The CRA Proposal weakens the criteria for what constitutes evidence of discriminatory or other illegal credit practices, and would effectively give banks a pass on unlawful discrimination, redlining, and consumer protection. It does this through changes to the regulatory language both obvious and subtle.

A. Unlawfully Limiting Consideration of Redlining Violations Under the Fair Housing Act

The CRA Proposal appears to attempt to remove redlining violations from consideration for a downgrade. If accurate, this is deeply concerning and incongruous with the clear statutory intent and text of the CRA as discussed in part I. The current CRA regulations provide that a discriminatory or other illegal credit practice includes “[d]iscrimination on a

²⁶ *Yick Wo v. Hopkins*, 118 U.S. 356 (1886).

²⁷ *Rosenberger v. Rector & Visitors of Univ. of Va.*, 515 U.S. 819, 830 (1995) (“[I]deologically driven attempts to suppress a particular point of view are presumptively unconstitutional in funding, as in other contexts.”); *Nat’l Endowment for the Arts v. Finley*, 524 U.S. 569, 587 (1998) (“[E]ven in the provision of subsidies,” however, “the Government may not” engage in viewpoint discrimination by “aim[ing] at the suppression of dangerous ideas.”); *Nat’l Rifle Ass’n of Am. v. Vullo*, 602 U.S. 175, 188 (2024); *Thakur v. Trump*, No. 25-4249 (9th Cir. May 26, 2026).

²⁸ 12 CFR §§ 25.28(d)(3), 345.28(c)(3).

²⁹ 12 U.S.C. § 2901 *et seq.*

prohibited basis, including in violation of the Equal Credit Opportunity Act (15 U.S.C. 1691 et seq.) or the Fair Housing Act (42 U.S.C. 3601 et seq.).”³⁰ The CRA Proposal subtly modifies this text by adding “against applicants” after discrimination.

ECOA prohibits discrimination against an “applicant,”³¹ which circuit court case law has found extends to discouraging prospective applicants (a common scenario in redlining cases).³² The CFPB recently attempted to narrow Regulation B’s protections for prospective applicants by substantially limiting when pre-application conduct constitutes unlawful discouragement.³³ NFHA has sued the CFPB related to this regulatory change.³⁴ The Fair Housing Act does not include the statutory term “applicant,” and is an independent basis for redlining cases, including where discrimination involves actions taken before a consumer applies for credit.³⁵

The CRA Proposal’s attempt to import statutory language that is not applicable to the Fair Housing Act is legally unsound for several reasons. This change is not discussed in the supplementary information for the CRA Proposal. Given the significance of the change, this failure to demonstrate awareness of the change or provide any reasoning for it would make the change arbitrary and capricious under the Administrative Procedure Act.³⁶ Additionally, the change imports statutory language under ECOA that is not applicable to the Fair Housing Act, making the change contrary to statutory authority. Finally, given the clear implications for redlining, a core reason behind the CRA as discussed in part I, this change cannot constitute the best reading of the statute.³⁷

B. Removing Consideration of Many Violations of the Truth in Lending Act

The Truth in Lending Act (TILA)³⁸ is a broad statute that includes consumer disclosures, as well as substantive protections for consumers including many of those adopted as part of the Dodd-Frank Wall Street Reform and Consumer Protection Act.³⁹ TILA requires disclosure of standard loan terms, requires clear advertising of credit terms to prevent bait-and-switch advertising, gives consumers a right to rescind loans taken out on their primary home that they may have felt pressured to accept, limits risky mortgage features, prevents

³⁰ 12 CFR §§ 25.28(d)(2)(i), 345.28(d)(2)(i).

³¹ 15 U.S.C. § 1691a(b).

³² *CFPB v. Townstone Financial, Inc.*, 107 F.4th 768 (7th Cir. 2024).

³³ Equal Credit Opportunity Act (Regulation B), 91 FR 21620, 21644–46 (Apr. 22, 2026).

³⁴ <https://nationalfairhousing.org/nfha-sues-cfpb-ecoa-rule-change/>

³⁵ See, e.g., 42 U.S.C. §§ 3602, 3604, 3605, 24 CFR part 100.

³⁶ *FDA v. Wages & White Lion Investments*, 604 U.S. 542, 566 (2025).

³⁷ *Loper Bright Enterprises v. Raimondo*, 603 U.S. 369 (2024).

³⁸ 15 U.S.C. § 1601 et seq.

³⁹ Pub. L. No. 111-203, 124 Stat. 1376 (2010).

steering and improper compensation models for mortgage loan originators, establishes certain standards for servicing, guarantees appraisal independence and includes core elements of a right to appeal an appraisal, allows consumers to dispute billing errors, caps unauthorized card charges, establishes fair rules for credit cards, and sets standards for qualified mortgages to prevent risky loan terms, among other things.

The CRA Proposal would narrow consideration of TILA violations to just those involving a consumer's right of rescission. Taking TILA's other protections off the table for consideration of a CRA downgrade does not ensure banks meet their continuing and affirmative obligation to meet the credit needs of local communities.⁴⁰ It disincentivizes banks from maintaining strong compliance programs to protect consumers' significant rights under TILA.

C. Removing Consideration of the Root Cause, Severity of the Harm, Duration of Violations, and Pervasiveness of Violations

The current CRA regulations provide that the agencies consider highly relevant factors about evidence of discriminatory or other illegal credit practices when determining if a downgrade is warranted including:

- the root cause or causes of any such violations of law, rule, or regulation;
- the severity of any harm to any communities, individuals, small businesses, and small farms resulting from such violations;
- the duration of time over which the violations occurred; and
- the pervasiveness of the violations.⁴¹

Consideration of these factors ensures that violations that harm individuals and communities, longstanding violations, and pervasive violations get the evaluation they deserve and are more likely to result in CRA rating downgrades. However, the CRA Proposal eliminates *all* these factors from consideration. Additionally, the CRA Proposal would replace an existing factor which holistically considers the effectiveness of a bank's compliance management system (CMS) and ability to self-identify and reduce risks⁴² with a new factor that merely considers a bank's policies and procedures to prevent discriminatory or other illegal credit practices and any corrective actions the bank has taken or committed to take. With the removed factors and proposed replacements, a bank's rating turns on its paperwork and post-hoc remediation rather than on how much

⁴⁰ 12 U.S.C. § 2901(a)(3).

⁴¹ 12 CFR §§ 25.28(d), 345.28(c).

⁴² *Id.*

damage was actually done or how long it went on — a materially weaker standard. Consideration of the bank’s CMS and the other removed factors provides a superior view.

D. The Agencies Should Consider Non-Public Examination Violations for CRA Downgrades, and Should Consider Enforcement Actions by Individuals and Private Organizations, Including Fair Housing Organizations

The CRA Proposal gives two options for eligible sources of evidence of unlawful discriminatory or other illegal credit practices that would be considered by the agencies. The first option would consider only public enforcement actions and judicial orders. The second would permit consideration of violations cited in an examination.

Both options limit consideration to actions by Federal or State agencies, or judicial orders to which they are a party. Under either option, evidence of discriminatory or other illegal credit practices from individual lawsuits or enforcement actions by private organizations, including qualified fair housing enforcement organizations and fair housing enforcement organizations, would be excluded.⁴³ Especially given the current retreat from Federal enforcement of fair housing laws⁴⁴ and the targeting of State enforcement of fair housing laws,⁴⁵ this limitation is insufficient to ensure banks fulfill the purposes of the CRA as outlined in part I and do not receive high marks under CRA while violating the law. There is no statutory basis for limiting consideration only to governmental lawsuits, and relevant laws themselves permit private enforcement.⁴⁶

Similarly, evidence cited in examinations by both Federal and State regulators should be considered. Because the FDIC and the OCC themselves control when they choose to cite a violation in an examination versus pursuing a public enforcement action, excluding examination violations would permit the agencies to exclude particular violations from consideration for a downgrade under the CRA Proposal.

V. The CRA Proposal Should Incorporate Support for Special Purpose Credit Programs

Special purpose credit programs (SPCPs) are authorized under the ECOA,⁴⁷ and help banks serve their “entire community” while complying with fair lending laws. In a prior CRA rule,

⁴³ 42 U.S.C. § 3616a(h)(1), (h)(2).

⁴⁴ See, e.g., <https://news.bloomberglaw.com/banking-law/us-fair-lending-enforcement-curbed-under-trump-cfpbs-final-rule>

⁴⁵ <https://www.housingwire.com/articles/attorneys-general-sue-hud-fhap/>

⁴⁶ See, e.g., 15 U.S.C. § 1691e, 42 U.S.C. § 3613.

⁴⁷ 15 U.S.C. § 1691(c).

the FDIC and the OCC included special purpose credit programs as part of the rule.⁴⁸ That inclusion was “universally” supported by commenters.⁴⁹ The current proposal does not include special purpose credit programs.

SPCPs have helped strengthen the mortgage banking sector, expand opportunities for consumers, and increase the breadth of mortgage products lenders can offer to people. From 2022 to 2024, special purpose credit programs backed by Fannie Mae and Freddie Mac helped nearly 58,000 economically disadvantaged persons of all backgrounds fairly access homeownership and the ability to build wealth for their families. According to the Federal Housing Finance Agency, those loans generated \$17.2 billion in positive economic impact.⁵⁰

SPCPs provide a proven method to help banks address the effects of redlining and disinvestment in the communities they operate in, while broadening their customer base of creditworthy borrowers. Incorporating SPCPs as qualifying for CRA credit would ensure that the proposal is consistent with the purposes of CRA and complements fair lending law as discussed in part I above.

VI. Conclusion

For the reasons described above, NFHA urges the FDIC and the OCC to withdraw the CRA Proposal. Alternatively, the FDIC and OCC should:

- maintain rigorous CRA requirements for banks with assets below \$30 billion;
- not impose onerous restrictions on grants to community nonprofits and fair housing agencies;
- maintain strong standards for fair housing, fair lending, and consumer protection violations; and
- incorporate SPCPs, which were “universally” supported by commenters in a prior rulemaking.

Sincerely,

NATIONAL ORGANIZATIONS

National Fair Housing Alliance

⁴⁸ FDIC, OCC, and the Federal Reserve System, 89 FR 6574 (Feb. 1, 2024) (2024 CRA Final Rule), available at: <https://www.federalregister.gov/documents/2024/02/01/2023-25797/community-reinvestment-act>

⁴⁹ 2024 CRA Final Rule at 6939.

⁵⁰ Federal Housing Finance Agency, Notice of Proposed Rulemaking for Fair Lending, Fair Housing, and Equitable Housing Finance Plans, 90 FR 35475, 35481 (July 28, 2025), available at: <https://www.govinfo.gov/content/pkg/FR-2025-07-28/pdf/2025-14183.pdf>

Americans for Financial Reform Education Fund
Coalition of Human Needs
Consumer Action
Legal Defense Fund
Mobility Works
National Association of Hispanic Real Estate Professionals (NAHREP)
National Association of Real Estate Brokers (NAREB)
National Coalition for Asian Pacific American Community Development (National CAPACD)
Rebuilding Together
Southern Poverty Law Center
The Leadership Conference on Civil and Human Rights

STATE/LOCAL ORGANIZATIONS

Arizona

Southwest Fair Housing Council

California

Fair Housing Advocates of Northern California
Fair Housing Council of Orange County
Fair Housing Council of Riverside County
Project Sentinel

District of Columbia, Maryland, Virginia

Equal Rights Center

Florida

Fair Housing Council of the Greater Palm Beaches
Fair Housing Opportunities Project for Excellence, Inc.
Urban League of Palm Beach County and Treasure Coast

Georgia

Metro Fair Housing Services, Inc.

Idaho

Intermountain Fair Housing Council, Inc.

Indiana

Fair Housing Center of Central Indiana

Illinois

Access Living
Chicago Lawyers' Committee for Civil Rights
HOPE Fair Housing Center

Neighborhood Housing Services of Chicago
Open Communities
South Suburban Housing Center

Louisiana

Louisiana Fair Housing Action Center

Massachusetts

Alternatives for Community and Environment, Inc.

Michigan

Fair Housing Center of Southwest Michigan
Fair Housing Center of West Michigan

Mississippi

HEED

New Jersey

New Jersey Citizen Action
New Jersey Institute for Social Justice

New York

Housing Opportunities Made Equal, Inc. of Buffalo, NY
Fair Housing Justice Center
Westchester Residential Opportunities

North Dakota

High Plains Fair Housing Center

Ohio

Fair Housing Resource Center
Housing Opportunities Made Equal of Greater Cincinnati
Miami Valley Fair Housing Center, Inc.

Pennsylvania

Fair Housing Partnership of Greater Pittsburgh
Fair Housing Rights Center in Southeastern PA
Rebuilding Together Pittsburgh

Tennessee

Fair Housing Council of Metropolitan Memphis

Virginia

Housing Opportunities Made Equal of Virginia (HOME)

Washington

Fair Housing Center of Washington

Wisconsin

Metropolitan Milwaukee Fair Housing Council