

Peter Rundlet

- if state has occ std, presumed reasonable. if not → 2 person

Sec. 508

→ 2 person/bedroom presumptively reasonable - puts resp. on ind'l to prove discrimin'd agst

→ if designed to improve livability, ^{to help in} managing residents

1988 - Fair Hsg Act ^(FHA) amended to include familial stds -

- exempts, state + local laws reasonable

- bipartisan support
- R Reagan signed

H/D has enforcement resp under FHA

Keating

Memo → gen'l std - 2 person/bedroom

↳ new BOCA std - using space

- withdrawn due to multifamily ^{hsg industry} opposition

Multifam:

• "trying to improve livability, property damage..."

- don't want H/D involved

= but Courts want more H/D direction

• theoretically

• NY Times article → Bob Dole - 4 kids in a bedroom



U. S. Department of Justice

Office of Legislative Affairs

Office of the Assistant Attorney General

Washington, D.C. 20530

The Honorable Alfonse M. D'Amato
Chairman
Committee on Banking, Housing,
and Urban Affairs
United States Senate
Washington, D.C. 20510

Dear Mr. Chairman:

I write as the committee considers S. 1260 and H.R. 2406, bills to restructure Federal public housing programs, which now are pending in conference.

The Department of Justice fully supports the views of the Administration on these bills, as spelled out in the letter from Secretary Cisneros on July 25, 1996. However, there are two issues that we understand are still being considered by the conference committee, that we believe requires additional comment by the Department of Justice.

Occupancy standards

Section 508 of the House bill would effectively overrule portions of the Fair Housing Act by allowing discrimination through the use of occupancy standards. The Senate bill has no comparable provision. We urge the conferees to accede to the Senate position on this bill.

The Fair Housing Act prohibits discrimination in housing based on race, color, religion, sex, national origin, disability and familial status. It creates an exemption for "any reasonable local, State, or Federal restrictions regarding the maximum number of occupants permitted to occupy a dwelling." 42 U.S.C. 3607(b)(1).

Section 508 would presume reasonable any State occupancy standard, regardless of whether it was reasonable. Thus, a State could create a standard of one person per bedroom (or per any number of bedrooms), and the standard would be presumed reasonable. The presumption would follow even if such a standard resulted in discrimination against persons protected under the Fair Housing Act.

In the absence of a State standard, Section 508 would create a presumption that a limit of two persons per bedroom was reasonable. Thus, Section 508 would create a de facto national occupancy standard of two persons per bedroom. Unlike the reasonableness standard contained in the Fair Housing Act, these standards would not take into account the size of the bedrooms or of the overall dwelling unit.

Enactment of this Section would seriously erode the protections extended to families with children when Congress enacted the Fair Housing Amendments Act in 1988. After lengthy hearings and careful deliberation, Congress concluded in 1988 that families with children were experiencing widespread discrimination. Given the scarcity of larger, multi-bedroom units, large families in particular faced serious problems in securing affordable housing.

However, this section would affect not only large families. By establishing a rigid two person per bedroom standard, this section would create a national occupancy standard that would adversely affect families both large and small. For example, a family could not permit three children to sleep in a large bedroom. A newborn baby would not be allowed to live with his or her parents in a one bedroom apartment.

The committees of jurisdiction did not consider Section 508. The provision was added during consideration of the bill on the House floor. We urge the conferees not to adopt a provision like Section 508 without hearings before the committees of jurisdiction to determine the impact it would have on the Fair Housing Act.

Appointment of Housing Foundation and Accreditation Board

Title IV of the House bill would establish the Housing Foundation and Accreditation Board (Board), an independent agency within the Executive branch. Among other duties, the Board would be invested with authority to establish procedures and standards for the evaluation, classification, and accreditation of the Local Housing and Management Authorities (LHMA) that would play a critical role in the low-income housing programs established in the legislation. Under Section 403 of H.R. 2406, the Board also would be responsible for assuring that financial and performance audits of LHMA were conducted annually and for reviewing these audits for the LHMA's accreditation. Under Sections 433 and 434, the Board would determine whether an LHMA would be accredited for purposes of the Act and determine the LHMA's performance category.

Members of the Board would hold Federal offices and would exercise significant authority pursuant to the laws of the United States. Therefore, their appointments to these offices must comply with the requirements of the Appointments Clause. U.S.

Constitution art. II, Section 2, cl. 2; see Buckley v. Valco, 424 U.S. 1, 126 (1976).

Section 402 of the bill provides that the twelve members of the Board would be appointed by the President. However, it further provides that the President must appoint eight members from among individuals recommended by the chairs and ranking minority members of certain House and Senate committees and four members from among individuals recommended by the Secretary of Housing and Urban Development (HUD). Section 402(a)(1)-(3). These provisions would unconstitutionally restrict the President's power of appointment under the Appointments Clause. See Buckley, 424 U.S. at 126-37. To avoid this problem, we urge the conferees to remove these restrictions on the President's authority.

Section 402(b)(1) and (b)(2) impose a variety of representational and experience qualifications which further circumscribe the President's power to appoint members of the Board. Although we recognize there are some circumstances in which Congress may impose some qualification requirements upon presidentially appointed officers, see Bowsher v. Synar, 478 U.S. 714, 740 (1986) (Stevens, J., concurring), any such requirements must leave sufficient "scope for the judgment and will of the person in whom the Constitution vests the power of appointment." Civil Service Commission, 13 Op. Att'y Gen. 516, 520-21 (1871). We believe the collective qualification requirements contained in Section 402(b)(1) and (b)(2) of the bill raise significant constitutional problems in that regard. Therefore, we recommend that the conferees express these qualifications as recommendations rather than as requirements.

Section 402 also requires the President to appoint all twelve members of the Board within 180 days after the bill's enactment. We believe that imposition of a rigid congressional deadline for the appointment of an officer of the United States generally constitutes an unconstitutional interference with the appointment power vested in the Executive Branch. Accordingly, we would construe the 180-day post-enactment appointment period as merely precatory rather than mandatory. To avoid any confusion on this point, we recommend that the conferees delete this provision or amend it to be advisory in nature.

Public Housing Agencies in Default

Section 108 of S. 1260 would amend 42 U.S.C. 1437(j)(3) of the United States Housing Act to provide that in the event the Secretary declares a "troubled" public housing agency to be in substantial default, the Secretary either may petition for the appointment of a receiver or may take possession of the public housing agency. Furthermore, the amendment would authorize either the receiver or HUD (if the Secretary took over the agency) to abrogate any contract that "substantially impede[d] correction of the substantial default." The Section provides

that any action taken by the Secretary or the receiver in taking possession of the public housing agency, shall be deemed to be taken by the public housing agency and "any liability incurred, . . . shall be the liability of the public housing agency." Section 438 of H.R. 2406 contains a similar provision.

Under this authority, to the extent that the Secretary abrogated a private contract between the public housing agency and a private vendor, the resulting breach of contract damages would presumably be imputed to the public housing agency. Significantly, nothing in the bill would expressly prevent the public housing agency from recovering its damages, in turn, from HUD under some contract or tort theory. Indeed, it does not preclude the public housing agency from relying upon Winstar Corp. v. United States, No. 95-865, _____ U.S. _____ (July 1, 1996), 1996 WL 359767 (U.S.), to argue that the legislation itself facilitated the breach of a private contract or otherwise constituted a taking under the Fifth Amendment. Whether these arguments would prevail in the face of sovereign immunity arguments is unclear. However, given the possibility that the agency could cast HUD's conduct as unfair, there is a real risk that ultimately the taxpayer would bear the costs of any contracts rejected under this provision.

When the Secretary takes possession of a "troubled" public housing agency, Section 108 gives him "such additional authority as a district court of the United States has conferred under like circumstances on a receiver to fulfill the purposes of the receivership." This Section is unclear and makes the additional authority of the Secretary subject to myriad interpretations.

By providing no reference to any particular court, receiver, authority, or situation, it is impossible to determine the additional authority the Secretary would have. The provision would create the potential for litigation, as a public housing agency, taken over by the Secretary, might argue that HUD's conduct exceeded its authority under this provision. Furthermore, to the extent that the reference is to receivers appointed in cases involving only private parties, this Section seemingly would reduce the Secretary's ability to meet the broad and wide ranging public policy aims of the United States Housing Act. If the intent of this Section is to provide the Secretary with such additional authority as is necessary to satisfy the requirements of the Act, it should say so expressly. It might provide:

[the Secretary] shall have such additional authority as is necessary to fulfill the purposes of the United States Housing Act of 1996.

We urge the conferees to omit this provision and add such clarifying language.

The Office of Management and Budget has advised this Department that there is no objection to the submission of this report from the standpoint of the Administration's program.

Sincerely,

Andrew Foia
Assistant Attorney General

cc: The Honorable Paul S. Sarbanes
Ranking Minority Member
Committee on Banking, Housing,
and Urban Affairs
United States Senate

The Honorable Connie Mack
United States Senate

The Honorable Lauch Faircloth
United States Senate

The Honorable Christopher S. Bond
United States Senate

The Honorable John F. Kerry
United States Senate

The Honorable Carol Moseley-Braun
United States Senate

The Honorable Jim Leach
U.S. House of Representatives

The Honorable Rick Lazio
U.S. House of Representatives

The Honorable Doug Bereuter
U.S. House of Representatives

The Honorable Richard H. Baker
U.S. House of Representatives

The Honorable Michael Castle
U.S. House of Representatives

The Honorable Henry B. Gonzalez
U.S. House of Representatives

The Honorable Bruce F. Vento
U.S. House of Representatives

The Honorable Joseph P. Kennedy II
U.S. House of Representatives



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NOTES:

I have also included a letter to
D'Amato from six Republican Senators that
expresses, on page 3, their concerns about the
provision. Good luck, Peter.

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Leadership Conference on Civil Rights

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Talking Points

H.R. 2406 Sec. 508 - Occupancy Standards

- This "anti-family" provision gives housing providers greater latitude in denying housing to families with children and racial minorities, who tend to have larger families, by allowing providers to establish a two-person-per-bedroom occupancy standard. Restrictive occupancy standards are the most frequently used pretext for discrimination against families with children. Under this provision, even a young couple with a newborn child could be evicted from a one bedroom apartment.
- Because Section 508 has retroactive application, families throughout the country could be displaced immediately if housing providers opt for the two-person-per-bedroom standard. As a result, many families could face homelessness because of a shortage of larger units and increased rents. Based upon the 1990 census, the following number of households could be evicted from:

1 bedroom rental units:	900,000
2 bedroom rental units:	913,000
3 bedroom rental units:	173,000

Finding alternative housing for these families would be difficult. In 1990, there were 8.5 million fewer three bedroom rental units than two bedroom units and vacancy rates for rental units were as follows:

1 bedroom:	9.0%
2 bedrooms:	7.3%
3 bedrooms:	4.2%
4 or more bedrooms:	3.7%

In fact, there would not be enough 3 bedroom or larger rental units available to accommodate evicted households. In 1990, there were only 300,000 vacant 3 bedroom units, compared to the 913,000 families that would be in need. Similarly, there were only 61,000 rental units with 4 or more bedrooms available to accommodate the 173,000 families living in 3 bedroom units who could be evicted under this standard.

- The two-person-per-bedroom occupancy standard is poor housing policy because it fails to take into account unit size.

- Through a backdoor measure, i.e., a Manager's Amendment, the House has eviscerated the Fair Housing Act's protections for families with children and the disabled. Section 508 also weakens protections for Asians, Hispanics, and African Americans, who disproportionately have larger families. The Judiciary Committee should assert jurisdiction and address this matter through the appropriate procedures, including holding hearings.
- The Fair Housing Act explicitly permits reasonable occupancy standards. These standards have been interpreted by the Supreme Court in *City of Edmonds v. Oxford House Inc.*, 115 S.Ct. 1776 (1995), to include only those designed to protect health and safety. Section 508 would overrule the *City of Edmonds* decision by changing the definition of occupancy standards to permit standards adopted for subjective reasons such as providing a decent home and services or enhancing livability for all residents. This new subjective definition would make it nearly impossible to establish the unreasonableness of an occupancy standard.
- This new definition of occupancy standards gives state and local governments the ability to shut out persons whose disabilities require group living.
- Section 508 allows housing providers to override state and local government standards adopted solely for health and safety reasons and to impose a two-persons-per-bedroom standard adopted for purposes of providing decent housing and enhanced livability.
- Section 508 provides that state and local occupancy standards are presumed reasonable. This rebuttable presumption changes fair housing law by shifting the burden of proof to victims of alleged discrimination.
- Section 508, goes far beyond addressing the intent of this legislation, i.e., public housing reform, by legislating occupancy standards for private housing. These issues should be addressed by the appropriate subcommittee, with an opportunity for hearings.

E. Kolbert, On the Kansas Prairie, the Window to Dole

NEW YORK TIMES, p. 1, 10, Sunday, May 19, 1996

(excerpt)

the barbecue grills strategically upwind from the out-of-town press.)

But Russell is not a town that could, by any stretch of the imagination, be said to represent America's future, nor is it even a town that most Americans would probably feel comfortable inhabiting.

It is strikingly homogenous — virtually all white, very largely Protestant and solidly Republican. It lies almost 200 miles from the nearest mid-sized city, in a region so treeless and flat that an Easterner can find it downright unnerving. Its small town-ness, while quaint, is also deeply anachronistic.

Like much of the rural Midwest, Russell has, in fact, been losing population steadily since about the time Mr. Dole graduated from high school; all of Russell County now has fewer than 8,000 residents, just a little more than half as many as it had in 1940.

In retrospect, it is clear that the years Mr. Dole lived in Russell were as close as the town has ever come to enjoying a boom. The same year Mr. Dole was born — 1923 — oil was discovered out in the wheat fields. The oil made a small group of local residents, known as "the Lucky Seven," very rich, and they built themselves incongruously oversized houses in the midst of Russell's modest one-story homes.

Oil is still an important part of the local economy, and pumping jacks still rhythmically peck at the wheat fields. But with the price of oil so low, no one in Russell calls himself lucky anymore. Years ago, when the price of oil was higher, the stakes of the morning guessing game were also higher, and covered the cost of an entire breakfast.

The Early Years

Back From War, A Turn to Politics

In his eulogy for Richard Nixon, Mr. Dole described the former President as "a boy who heard the train whistle in the night and dreamed of all the distant places at the end of the track." The line was widely interpreted as a reference to himself, too.

But if Mr. Dole had dreams of distant places as a boy, no one in Russell, or at least no one who is left, seems to have heard about them. Indeed, there isn't much out-of-the-ordinary that is remembered about Bob Dole until his dramatic return as a war veteran with a ruined right arm.

Mr. Dole grew up on the north side of Russell, quite literally the wrong side of the tracks, in a little white house with two bedrooms. For years, the four Dole children shared one bedroom until as teenagers Mr.

Dole and his younger brother, Kenny, fixed up a room for themselves in the basement. The family had to struggle to make ends meet, but, so, it seems, did most everyone in Russell during the Depression.

"Everybody was poor," said G. B. (Bub) Dawson, whose father ran the drugstore where Mr. Dole worked as a soda jerk. "We didn't know any better."

Schoolmates of Mr. Dole remember him as a handsome and popular young man, but not one who seemed destined for leadership. He was, by all accounts, a responsible student, but not a brilliant one, a devoted and competitive athlete, but not a naturally gifted one. Ralph Resley, a retired postal worker who went to high school with Mr. Dole, has kept a copy of the school paper from their graduation; in the Class of 1941's last will and testament, Mr. Dole is noted mainly for his shyness around girls.

Nor is there any trace of an early interest in politics. Mr. Dole's sisters, Gloria Nelson and Norma Jean Steele, who both live in Russell, say that politics was not a big topic of conversation in the Dole house while they were growing up, nor were Mr. Dole's parents politically active. They were registered as Democrats, out of friendship, Mrs. Nelson said, for a local Democratic politician.

The Bob Dole who is sharply remembered in Russell — and whom townspeople recall as something of a hero — is the emaciated, nearly paralyzed soldier who returned here in 1945, his right arm locked at a 45-degree angle. Russell, according to his old friends, adopted Mr. Dole at that point, rallying around him during his long convalescence.

Some of the boys who had gone off to war from the town had not come back at all, including Mr. Dole's good friend Bud Smith. But of those who survived he was the most gravely injured, and he spent three years in and out of hospitals, twice suffering infections that nearly killed him. When he was away, townspeople would follow his progress. And when he was home, they would stop by to play cards; someone had rigged up a cardholder so that he could play with one hand.

Mr. Dawson recalled that it was his brother, Chet, who started the collection in a cigar box down at the family drugstore when Mr. Dole went off to have surgery in Chicago. Pretty soon, others started collections, and eventually the town raised \$1,800, a significant sum in 1947. The operations — there were three of them — did allow the arm, at last, to hang straight by his side. But it became clear that he would never regain its use, and Mr. Dole, who had dreamed of becoming a doctor, decided to go to law school instead.

OCCUPANCY STANDARDS ARE ANTI-FAMILY

Representative Bill McCollum's (R-FL) proposal to enact federally-mandated occupancy standards applicable to all housing providers—public and private—is a disaster for American families. Section 508 of the United States Housing Act of 1996 allows landlords to restrict occupancy to no more than two persons per bedroom. The effect will prove devastating for many families.

Purportedly designed to "enhance the livability" of a dwelling for all residents, the anti-family ceiling on household membership would allow a couple living in a one-bedroom apartment to be evicted upon the birth of their infant son or daughter. A hard-working couple with three children can be required to rent a three-bedroom apartment—a home increasingly scarce and expensive. The proposed occupancy standard does not even take into account actual apartment size or layout. All one-, two-, and three-bedroom apartments are not created equal.

Because the amendment has retroactive application, it would permit the large-scale eviction of families throughout the country. Two million persons could be displaced by this policy. Because African-American, Latino, and Asian-American families tend to have larger families and are more likely to live in rental housing than white Americans, they would suffer most.

In 1988, a bi-partisan Congress, with the support of the Reagan administration, extended the Fair Housing Act to protect families with children. This protection was afforded for two reasons: first, and more obvious, to put a quick end to discrimination against families with children and to open up more housing opportunities for all families; and, less obviously, to remove one of the most common pretextual reasons for discriminating against racial minorities. Before the 1988 Amendments, many cases indicated that housing providers would deny housing to minorities on the pretext that they did not rent to families with children.

An incident that occurred this past June illustrates this. Paula Collins, of Florence, Kentucky, lives with her mother, her two sons, and her infant daughter. Paula Collins is white. Ms. Collins's two youngest children, Hakeem and Kala, are interracial and they live in an otherwise all-white complex, Parkland Apartments.

Everything was going fine for the Collins family until the spring of 1995, when Ms. Collins and her son John began to experience direct and grotesque racial harassment by other tenants in the building. Ms. Collins's 14-year-old son John was pulled aside by a middle-aged man who threatened that John's family had better move soon, because "we don't want any niggers around." Other tenants in the building call Paula Collins "Sapphire," and she was recently asked whether she was "still swapping spit with those niggers." When Ms. Collins sought the assistance of the building management to peacefully resolve the situation, she was told that there was nothing they could do. The racial harassment continued.

In November, 1995, Ms. Collins's daughter Kala was born, bringing the number of people in her two-bedroom apartment to five. Although the landlord was aware of this, no issue was made at the time and Ms. Collins's lease was renewed in early 1996. After hearing complaints from other tenants that they "didn't want any niggers living here," the landlord attempted to evict the Collins family in February, 1996. The reason? Ms. Collins paid the rent on February 2nd, one day late. After Ms. Collins threatened legal action against the proposed eviction (since her lease explicitly provided a three-day grace period), Parkland Apartments backed down.

But the racial harassment did not stop. Finally, after several ugly incidents, Ms. Collins called the local police department in late May of this year. The police, in turn, brought in the F.B.I. The day after an F.B.I. Special Agent came to the Parkland Apartments to investigate the situation, Ms. Collins received notice that she and her family were in violation of Parkland Apartments's two-person-per-bedroom occupancy standard and that she had seven days to get rid of one member of her family or the whole family would face eviction.

Ms. Collins's lease says nothing about any occupancy standard, but if the McCollum family size limit is enacted, the Parkland Apartments' decision that Ms. Collins's family is too large would "be presumed reasonable." The McCollum anti-family loophole would create a burden of proof for families victimized by discrimination that is extremely difficult to meet.

Federally-imposed occupancy standards are *completely unnecessary*. The Fair Housing Act already allows state and local occupancy standards, and many states and localities have adopted such standards based on health and safety concerns. No hearings have been held on the family-size cap, as it was added to the housing bill at the eleventh hour.

House and Senate conferees have been meeting to reach agreement on various aspects of the proposed public housing reform bills. Because this anti-family household size cap is so devastating to American families, because it eviscerates Fair Housing Act protections enacted with a broad consensus without any public hearing, and because it is unnecessary, these conferees should do the right thing and strike this amendment from the housing bill.

845 words.

United States Senate

WASHINGTON, DC 20510

June 26, 1996

The Honorable Alfonse D'Amato
Chairman
Committee on Banking, Housing, and Urban Affairs
United States Senate
Washington, DC 20510

Dear Mr. Chairman:

As you prepare to go to conference with the House of Representatives on very important public housing reform legislation, we write to express our serious concerns about four provisions of the House-passed bill.

First, we were disappointed to learn that the House had voted to repeal the rent protections of the Brooke amendment for residents of public and assisted housing who earn more than 30 percent of the area median income. We agree that the Brooke amendment, as currently structured, serves as a disincentive to work in many cases and is in need of reform. In our view, however, the House proposal will do nothing to remove that disincentive and actually could exacerbate the problem.

Take for example, a single mother and her three children living in public housing. The mother earns \$12,000 a year (less than 30 percent of the median in many states) and pays \$264 per month in rent, after adjustments. If she were to take a job paying \$14,000 a year (just above 30 percent of the median), under current law her rent would increase to \$314 per month. The family would pay no more than that under the Senate bill, since it preserves Brooke protections for families earning up to 50 percent of the area median income.

Under the House bill, however, her rent would increase to whatever the public housing authority (PHA) deemed appropriate. The Fair Market Rent for a two-bedroom apartment in Providence, for example, is \$642 per month. While a PHA is unlikely to charge that much, even if it only charged \$500 per month, the family's rent would double and the increased earnings would disappear. In this situation, the family would be worse off than if the mother had stayed at the lower paying job.

The Honorable Alfonse D'Amato
June 26, 1996
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It seems to us that we should be rewarding rather than punishing working families who are trying to lift themselves out of poverty. We urge you, therefore, to reject the Brooke amendment revisions of the House bill in favor of the much more reasonable Senate proposal.

Second, we strongly object to the mandatory minimum rent provision of the House bill. Unlike the Senate bill, which would permit PHAs to charge a minimum rent of up to \$25, the House legislation would require PHAs to charge all of the residents in its jurisdiction a minimum rent of between \$25 and \$50 per month, regardless of their income. Legislation intended to devolve authority to the PHAs should not require them to create undue hardships for very poor tenants. Therefore, we support the Senate language on minimum rents.

In addition, we are deeply concerned that any minimum rent provision emerging from conference not apply to tenants in developments built under the Moderate Rehabilitation Single Room Occupancy (SRO) program. As you know, Congress established the SRO program specifically to provide shelter to the homeless – individuals who typically have no income. It simply makes no sense, then, for the federal government to turn around and mandate that these families pay a minimum rent that puts them at risk of renewed homelessness.

Third, we are troubled by a provision in the House bill to require non-elderly, non-disabled adult residents to sign self-sufficiency contracts with their PHA. As we understand it, these contracts would set out enforceable interim goals related to education, mental health support, and job training, and would establish a time frame for "graduating" out of public housing. Failure to meet the terms of these contracts ultimately could result in eviction.

We oppose this provision for two reasons. One, it would burden PHAs with the task of developing and supervising an individual personal improvement plan for potentially hundreds of tenants. Two, it would establish a process through which unemployed tenants who find a job would be automatically forced to move out of public or assisted housing. Such a policy contradicts this legislation's stated goal of promoting a greater income mix by encouraging working families to stay in public housing.

The Honorable Alfonse D'Amato
June 26, 1996
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Finally, we hope you will take a hard look at the House proposal to override the Fair Housing Act's definition of reasonable occupancy standards in favor of an arbitrary federal standard of two persons per bedroom. This legislation would apply to all -- not just public -- housing and could dramatically limit access to housing for minorities, families with children, and members of other protected classes. We are also concerned that such a standard would undermine important fair housing protections for persons with disabilities living in group homes. *

While we support meaningful reform of our housing programs, we believe these four House provisions go too far. We appreciate the hard work you, Senator Mack, and Senator Bond have put into crafting consensus public housing legislation, and urge you to resist any efforts to add them to the Senate bill.

Thank you for taking the time to consider our views.

Sincerely yours,

John H. Clayer

Nancy London Tassubaum

John H. Clayer

Jim Jeffords

Allyson Snow

Allen Smith
(Senate Amend.)