



February 17, 2015

Regulations Division
Office of General Counsel
451 7th Street S.W.
Room 1026
Department of Housing and Urban Development
Washington, DC 20410-0500

Re: Docket No. FR-5173-N-03: Affirmatively Further Fair Housing: Re-Opening Public Comment Period on Subject of Later First AFH Submission Date for Certain Entities

The Council of State Community Development Agencies (COSCDA) represents state housing and community development agencies responsible for administering the Department of Housing and Urban Development (HUD) programs, including the Community Development Block Grant (CDBG) program, the HOME Investment Partnerships (HOME) program and the McKinney-Vento Homeless Assistance Programs. On behalf of the members of COSCDA, I respectfully submit the following comments regarding the proposed rule, Affirmatively Further Fair Housing: Re-Opening Public Comment Period on Subject of Later First AFH Submission Date for Certain Entities.

The proposed rule includes a specific solicitation of comment #1: *HUD welcomes public comment on the proposal to delay submission of the first AFH for States and Insular Areas.*

COSCDA agrees with the proposal to delay submission of the first AFH for States. This will allow States additional time to develop and complete the first AFH. We also want to highlight that COSCDA recommended in our comments to the Affirmatively Furthering Fair Housing Proposed Rule that the AFH should be developed as part of the Con Plan and should not be separate. COSCDA suggested that HUD integrate the AFH provisions with the Con Plan, without requiring a separate, prior AFH development and approval process. And most importantly, we recommended that not only should the AFH submission be delayed for States, but that the scale of the AFH needs to be changed to make it appropriate for States.

COSCDA is particularly pleased that HUD has agreed to design a separate Assessment Tool for States. We appreciate that HUD wants to design a tool that is appropriate for States, given the differences in State and local grantees. We are also pleased to see that HUD will provide for the full notice and comment process (a 60-day notice and a 30-day notice) under the Paperwork Reduction Act.

Thank you for giving us the opportunity to comment on this proposal to delay the first submission of the AFH. As we stated in our previous comments, COSCDA would be most willing to work with HUD as it develops a proposed template for States. Please contact me if you have questions regarding these comments, or if you want to move forward with State assistance in the development of the template, at 202-293-5820.

Sincerely,

A handwritten signature in black ink, appearing to read "Dianne E. Taylor". The signature is written in a cursive style with a large, stylized initial "D".

Dianne E. Taylor
Executive Director