

The Honorable Marcia L. Fudge  
Secretary  
Department of Housing and Urban Development  
451 7th Street, SW  
Washington, DC 20410

RE: Affirmatively Furthering Fair Housing

Dear Secretary Fudge:

On behalf of Nemours Children's Health, we write in support of the United States Department of Housing and Urban Development's (HUD) proposed rule to implement and further the purposes and policies of the Fair Housing Act. Thank you for your leadership in supporting policies that promote fair housing choice, prohibit discrimination, eliminate disparities, and foster inclusive, high opportunity communities where children and families can thrive. Fair housing laws are essential for building strong, resilient communities that foster family and child health.

#### **ABOUT NEMOURS**

Nemours Children's Health is one of the nation's largest multistate pediatric health systems, which includes two free-standing children's hospitals and a network of more than 70 primary and specialty care practices. Nemours Children's seeks to transform the health of children by adopting a holistic health model that utilizes innovative, safe, and high-quality care, while also caring for the health of the whole child beyond medicine. Nemours Children's also powers the world's most-visited website for information on the health of children and teens, [Nemours KidsHealth.org](http://NemoursKidsHealth.org).

The Nemours Foundation, established through the legacy and philanthropy of Alfred I. duPont, provides pediatric clinical care, research, education, advocacy, and prevention programs to the children, families and communities it serves.

As a [Healthcare Anchor Network](#) (HAN) health system, Nemours Children's is an institution committed to our communities' long-term well-being. Hospitals and health systems are critical partners in addressing numerous social drivers of health, including housing insecurity. An affordable, quality and stable place to live in a high opportunity neighborhood – one that is resource-rich with physical and social conditions to support health, safety, social connection, and well-being, including access to quality child care and schools, safe and affordable housing, nutrition, and healthy environmental conditions (e.g., clean air) – supports the health of all people across the life course and contributes to thriving communities. Moreover, addressing the social and structural determinants of health, including safe, equitable and affordable housing, can help curb avoidable healthcare costs, improve health and well-being over the life course, and promote economic sustainability and community health. Housing assessment and planning processes focused on fair housing and addressing barriers to opportunity help create thriving and equitable communities, contributing to the health of generations of children.

#### **BACKGROUND**

Housing, health and racial equity are inextricably linked. The current housing crisis disproportionately impacts people of color, resulting from decades of discrimination

and disinvestment. Low-income families with children are also disparately impacted by the lack of affordable housing in thriving communities across the U.S. People of color comprise a significant portion of the poorest families, paying more than half of their income for rent and utilities. According to the U.S. Census Bureau, over 40% (19 million) of renter households in the U.S. spent more than 30% of their income on housing costs during the 2017-2021 period, leaving too little for other necessary expenses including transportation, healthy food and medical care.

In many communities across the country, people of color, including families with children, disproportionately live in low opportunity neighborhoods that exhibit high poverty, increased exposure to crime, low-quality housing, food deserts, pollution, few opportunities for physical activity, and limited job opportunities.<sup>i</sup> These impacts are cumulative over the life course with enduring impacts on health and well-being, particularly when exposures begins in and persists throughout early childhood.

The Affirmatively Furthering Fair Housing (AFFH) rule would support inclusive and equitable access to neighborhoods of opportunity, which are well-documented to support child health. Research shows a stable and nurturing environment is essential to the health and well-being of a child. Many effects of low-quality or unstable housing on child development last well into adulthood. Children living in poor quality housing have higher baseline symptoms of anxiety and depression starting from elementary school and continuing into adulthood.<sup>ii</sup> Toddlers and infants are particularly vulnerable to exposure to harmful building materials in low-quality housing, such as lead paint and asbestos, which is linked to nervous system damage and developmental delays.<sup>iii</sup> Compared to homeowners, renter families with children more commonly find asthma triggers within their homes and are more likely to have at least one child with asthma.<sup>iv</sup> Infants in families facing homelessness are more likely to have low birthweight or respiratory illnesses than infants in stable housing.<sup>v</sup>

Conversely, several landmark studies demonstrate that the health and social benefits of housing mobility, particularly moves to high opportunity neighborhoods, are especially significant for children. For example, one study showed that access to vouchers facilitating moves to high opportunity neighborhoods resulted in significantly lower rates of hospitalization, hospital days and overall hospital spending.<sup>vi</sup> Rates of obesity and diabetes among households with women and children are also lower for those who move to lower poverty neighborhoods.<sup>vii</sup> Mental health disorders among children are less prevalent – particularly among girls – for those who move to high opportunity neighborhoods as well.<sup>viii</sup> Additionally, children whose families move to high opportunity neighborhoods experience long-term, cumulative socioeconomic benefits. These include higher lifelong earnings and higher educational attainment, including college.<sup>ix</sup> Younger children display the most substantial positive effects of living in a high opportunity neighborhood, and these effects last well into adulthood.<sup>x</sup>

## **NEMOURS COMMENTS & RECOMMENDATIONS**

Nemours strongly supports the goals of increased access to stable, safe, quality and accessible housing in high opportunity communities, especially for families with low incomes. In accordance with existing evidence, we support efforts to develop diverse, inclusive communities that promote physical, mental, economic and social well-being. Addressing the challenges of concentrated and racialized poverty and oppression, coupled with policies that promote intergenerational economic mobility, can produce overwhelmingly positive impacts on child health outcomes in the short- and long-term.

Nemours supports HUD's efforts to update and implement the 2015 AFFH rule, which was a critical step in addressing historical and ongoing housing segregation patterns.

Strong and effective fair housing laws are essential for supporting population health and well-being; optimizing the health of our nation's children and future generations; and building prosperity for individuals, communities, regions and the nation. Through this rule, HUD has an opportunity to deliver on its mission to create strong, sustainable, inclusive communities and quality affordable homes for all. At the same time, access to healthy communities and neighborhoods of opportunity improves the health of our nation and future generations. This rule puts in place a strong structure for localities and regions to deliver on fair housing requirements by mandating that equity and accountability are a central focus while also supporting population health and wellbeing.

**We join HAN in recommending that the final AFFH rule provide clear requirements and guidelines to jurisdictions on assessing whether members of protected classes have equal access to jobs, analyze the factors contributing to any disparities, and meaningfully advance solutions.** When there is a geographic mismatch between economic opportunity and affordable, transit-accessible housing, workers and job seekers face significant barriers to participating in the local economy. These barriers include cost, time and logistical hurdles that can perpetuate challenges, especially in underserved and under-resourced areas. Fair housing assessments support the development of affordable housing near job centers and economic development corridors and address the mismatch between places where workers of color reside and the locations of jobs. In these ways access to affordable housing also improves access to health-promoting community environments, thus investing in the health of the population and of future generations.

Access to affordable housing and nearby job centers improves patient population outcomes. Stable, thriving neighborhoods support health. Health equity is achieved when everyone, regardless of race, neighborhood, or financial status, has a fair and just opportunity for health, inclusive of physical, mental, economic and social well-being. **We urge HUD to require states, local governments and housing authorities to consult with public health departments to align efforts focused on addressing health disparities with resources to support opportunity for individuals and the population, identify key community needs, and align AFFH activities with health efforts such as community health needs assessments and community health improvement plans.**

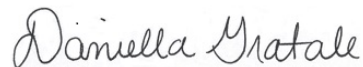
#### **CONCLUSION**

Nemours supports HUD's efforts to update and implement the AFFH rule, and we appreciate your consideration of our recommendations. Please do not hesitate to reach out to us at [Rachel.Thornton@nemours.org](mailto:Rachel.Thornton@nemours.org) or [Daniella.Gratale@nemours.org](mailto:Daniella.Gratale@nemours.org) if we can be of further assistance.

Sincerely,



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Associate Vice President  
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- <sup>i</sup> Bergman P, Chetty R, DeLuca S, Hendren N, Katz LF, Palmer C. *Creating Moves to Opportunity: Experimental Evidence on Barriers to Neighborhood Choice.*; 2023. [https://opportunityinsights.org/wp-content/uploads/2019/08/cmto\\_paper.pdf](https://opportunityinsights.org/wp-content/uploads/2019/08/cmto_paper.pdf)
- <sup>ii</sup> Gaitán V. How Housing Affects Children's Outcomes. Housing Matters. Published January 2, 2019. <https://housingmatters.urban.org/articles/how-housing-affects-childrens-outcomes>
- <sup>iii</sup> Schneider A, Gibbs H. Disparities in Housing, Health Care, Child Care, and Economic Security Affect Babies for Life. Center for American Progress. Published December 7, 2022. <https://www.americanprogress.org/article/disparities-in-housing-health-care-child-care-and-economic-security-affect-babies-for-life/>
- <sup>iv</sup> Gaitán V. How Housing Affects Children's Outcomes. Housing Matters. Published January 2, 2019. <https://housingmatters.urban.org/articles/how-housing-affects-childrens-outcomes>
- <sup>v</sup> Acosta S. Stable Housing Is Foundational to Children's Well-Being. Center on Budget and Policy Priorities. Published February 15, 2022. <https://www.cbpp.org/blog/stable-housing-is-foundational-to-childrens-well-being>
- <sup>vi</sup> Pollack CE, Blackford AL, Du S, Deluca S, Thornton RLJ, Herring B. Association of Receipt of a Housing Voucher With Subsequent Hospital Utilization and Spending. *JAMA*. 2019;322(21):2115–2124. doi:10.1001/jama.2019.17432
- <sup>vii</sup> Ludwig J, Sanbonmatsu L, Gennetian L, et al. Neighborhoods, Obesity, and Diabetes — A Randomized Social Experiment. *New England Journal of Medicine*. 2011;365(16):1509-1519. Doi:<https://doi.org/10.1056/nejmsa1103216>
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- <sup>ix</sup> Chetty, Raj, Nathaniel Hendren, and Lawrence F. Katz. 2016. "The Effects of Exposure to Better Neighborhoods on Children: New Evidence from the Moving to Opportunity Experiment." *American Economic Review*, 106 (4): 855-902. DOI: 10.1257/aer.20150572
- <sup>x</sup> Ibid.