



June 13, 2019

Submitted via [www.regulations.gov](http://www.regulations.gov)

Office of General Counsel, Rules Docket Clerk  
Department of Housing and Urban Development  
451 7<sup>th</sup> Street SW, Room 10276  
Washington, DC 20410-0500

Re: HUD Docket No. FR-6152, RIN 2506-AC53 Comments in Response to Proposed Rulemaking: Revised Requirements Under Community Planning and Development Housing Programs (FR-6152)

I am writing on behalf of the Kalamazoo Community Foundation to provide public comment to the Department of Housing and Urban Development's proposed rule change to the Equal Access Rule created in 2012. In its current form, this rule ensures that shelters and programs dedicated to supporting the housing needs of homeless individuals are unable to discriminate based on an individual's sexual orientation or gender identify, without exception. This proposed rule would strip the protections the Equal Access Rule currently has in place for all Lesbian, Gay, Bi-sexual, Transgender and Queer (LGBTQ) members of the Kalamazoo Community, and specifically strip the protections in place for transgender individuals in our community more broadly. Allowing institutions currently utilizing HUD programs and resources to determine individual policies and practices regarding the placement of individuals based on their sex and gender identity would be harmful to vulnerable communities across the country.

This proposed rule weakens and undermines fair housing protections and permits blatant discrimination against members of the LGBTQ community and especially creates barriers for homeless LGBTQ youth, further marginalizing them. Individuals from the LGBTQ community are already disproportionately affected by homelessness. Further, up to 40% of all homeless youth identify as LGBTQ. In the city of Kalamazoo alone, over 3,500 individuals are experiencing homelessness. As the Kalamazoo Community Foundation continues to prioritize equity, this proposed rule raises serious

concerns about the impact of additional barriers to shelters and housing will have on our community and its most marginalized residents.

As organizations, groups and individual residents are working tirelessly every day to ensure that everyone in this community has access to housing, the Kalamazoo Community Foundation along with the leadership of the Kalamazoo Truth, Racial Healing and Transformation (TRHT) initiative strongly oppose this harmful policy proposal that undermines ongoing efforts to address the housing needs of our residents. We believe that the LGBTQ community, specifically transgender people most impacted by this policy have a right to equal protection under the law and to choose placement in line with their identity. These equal protections should continue to include government-funded shelters. We urge the Department of Housing and Urban Development to maintain the protections of the Equal Access Rule and ensure that shelters receiving public dollars through government agencies are obligated to adhere to inclusive and welcoming policies and practices that provide access to housing for every member of our community.

Sincerely,



Carrie Pickett-Erway  
President/CEO  
Kalamazoo Community Foundation



Martha Gonzalez-Cortes  
Vice President of Community Investment  
Kalamazoo Community Foundation