



National Association of Real Estate Brokers, Inc.

9831 Greenbelt Road - Suite 309 | Lanham, MD 20706

June 10, 2020

RE: OMB Disparate Impact Comments

Greetings,

I would like to thank you for the opportunity to give comments today as we look come to a solution that can provide fair and equitable housing for our communities. NAREB, as the nation's oldest organization for black real estate professionals, have been witness to the various stages of stifle and struggle to the path of fair housing practices. We were on the front lines when both the Civil Rights of 1964 and the Fair Housing Act of 1968 were passed which was intended to expanded opportunity for communities who have historically been discriminated against. We believe the Disparate Impact standard, established by Title VII of the Civil Rights Act and reaffirmed by the Supreme Court through *Texas Department of Housing and Community Affairs v ICP* (2015) that said, "Disparate-impact liability furthered the purpose and design of the statute (Title VII)". Following the spirit of this precedent, we believe that HUD's new Disparate Impact Standard rule erects obstacles for our communities to combat discriminatory housing practices by putting an onerous burden of proof in the midst of a process that is already strenuous and lengthy. Discriminatory practices are alive and well as shown by the Newsday Report, "Long Island Divided" which showed the unscrupulous practices by real estate agents in Long Island, NY that intentionally did not sell homes to minority homebuyers. This act, not unfamiliar from the days of Jim Crow, shows that our consumers and communities are still at risk of being taken advantage of. For these reasons, we ask that you not pass HUD's new disparate impact standard rule.

James Privette

James Privette
Policy & Advocacy Coordinator