



NATIONAL
CAPACD

POLICY PLATFORM

2015-2017

ADOPTED BY NATIONAL CAPACD MEMBERS ON SEPTEMBER 30, 2015



2015-2017 Policy Goals and Priorities

The National Coalition for Asian American Pacific Community Development (National CAPACD) is a coalition of nearly 100 organizations, spanning 19 states and Pacific Islands. Its mission is to improve the quality of life for low-income Asian Americans and Pacific Islanders (AAPIs) by promoting economic vitality, civic and political participation, and racial equity.

National CAPACD's members work in the areas of affordable housing, economic development, cultural preservation, and neighborhood revitalization through direct services, community organizing, planning and development, as well as community and civic engagement. National CAPACD is the only AAPI-focused HUD approved housing counseling intermediary. It is led by some of the most innovative community development organizations in the country, and is a committed partner in coalition work across communities of color to address racial and economic injustice.

Asian Americans and Pacific Islanders

The Asian American and Pacific Islander (AAPI) population in the U.S. is incredibly diverse, ethnically and economically. It includes Native populations that pre-date the formation of the United States in the Pacific Islands, including Native Hawaiians and immigrant populations whose origins are from the regions of East Asia, South Asia, and South East Asia dating back from the mid-1700s to today's newest Americans.

- The AAPI community is **the fastest growing racial group in the country**, growing over four times as rapidly as the total U.S. population, and is expected to double to over 47 million by 2060.¹
- In 2014, the number of **AAPIs living below the Federal Poverty line was over 2.16 million**, with a rate of increase over the past 5 years that was greater than for any other major racial or ethnic group. (Fig. 1)
- AAPIs have suffered a severe loss in wealth since the recession and housing crisis. A 2011 Pew Research Center study found that **Asian American net worth fell 54% from 2005 to 2009** compared with a 16% decline for whites.² (Fig. 2)

Fig. 1

PERCENTAGE OF CHANGE IN POVERTY POPULATION, BY RACE/ETHNICITY
2009-2014

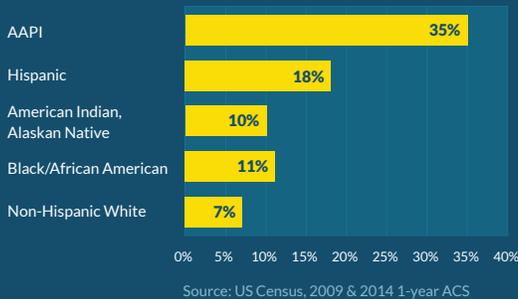
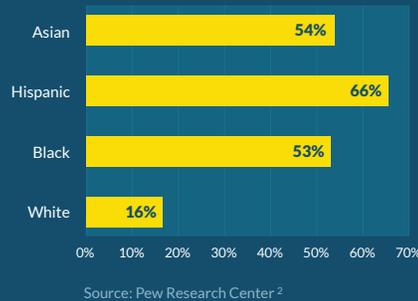


Fig. 2

IMPACT OF RECESSION AND HOUSING CRISIS ON NET WORTH
Decrease in Net Worth Between 2005 and 2009



CASH IS STILL KING!

74% of low-income AAPIs report using cash for day-to-day financial transactions such as buying lunch or groceries.

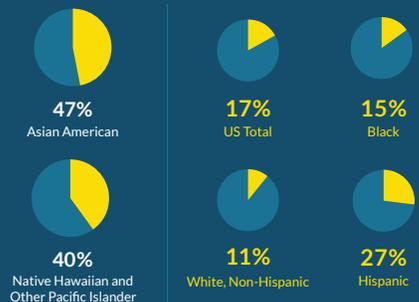
Source: National CAPACD's Scrimping & Savings Report

Where We Live

- AAPIs living in poverty are concentrated in a limited number of metropolitan statistical areas (MSAs) with **more than 50% of the total AAPI poor living in the top ten MSAs** compared to 25% of the nation's poor population.
- AAPIs are also disproportionately **concentrated in metro areas with the highest housing costs** as well as in **neighborhoods that are "majority minority."**³ (Fig. 3)
- As a result, **residents and small businesses in AAPI neighborhoods across the country are at great risk of displacement.**

Fig. 3

PERCENTAGE OF TOTAL POOR POPULATION LIVING IN HIGH HOUSING COST REGIONS



Spotlight on AAPI poverty

1 - White House Initiative on Asian Americans and Pacific Islanders, Data on the Asian American and Pacific Islander Community, <https://www.whitehouse.gov/administration/eop/aapi/data>

2 - Velasco, Gabriel, Taylor, Paul, Motel, Seth, et al. "Wealth Gaps Rise to Record Highs Between Whites, Blacks, and Hispanics" Pew Research Center, 2011.

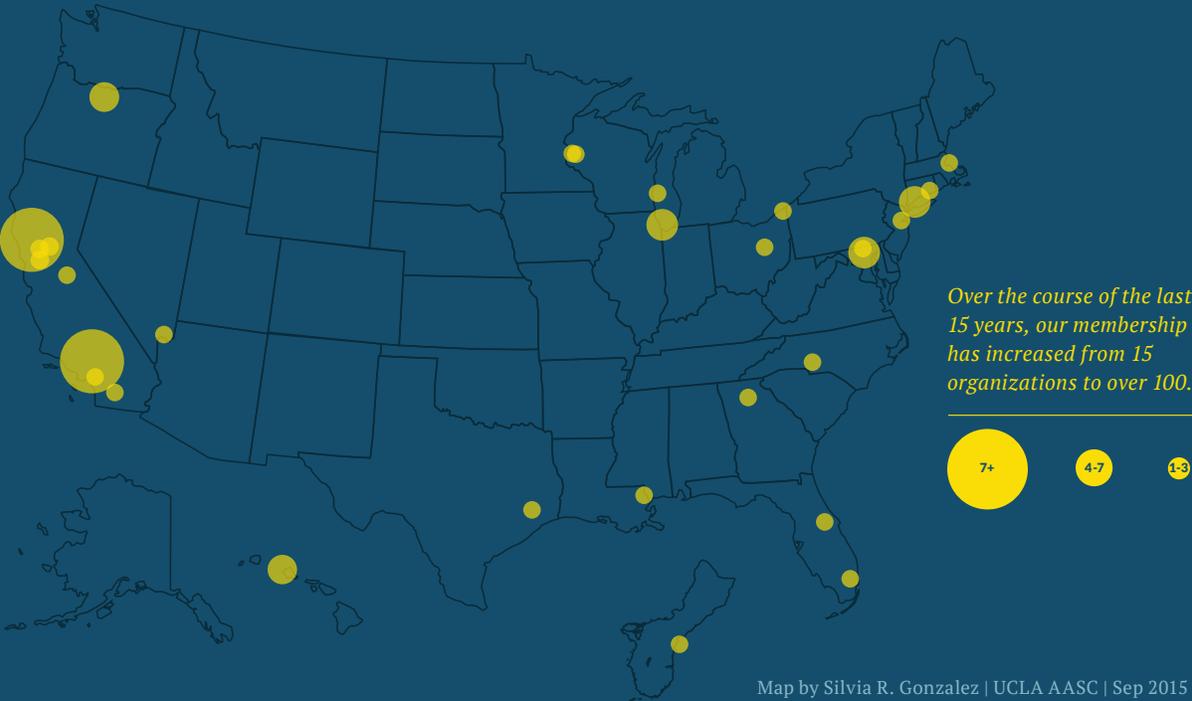
3 - National CAPACD, "Spotlight: Asian American and Pacific Islander Poverty," June 2013.

National CAPACD's Vision and Values

We envision a future in which Asian American and Pacific Islander communities and all communities of color have the economic resources and opportunities they need to thrive.

- We believe that any policy or structural change must be rooted in the realities and experiences of our affected constituency, our grassroots base.
- We believe that local voices should have national influence. Members of local communities are the experts of their lived experiences and bring valuable insights to light.
- We believe in economic, racial, and social justice. Quality of life is influenced by structural barriers and to address resulting inequalities, our analysis and strategies must incorporate race, class, gender, religion, sexual orientation, and disability.

National CAPACD Member Organizations



National CAPACD Policy Goals and Priorities

Through its national influence efforts, National CAPACD seeks to achieve the following for low-income AAPIs and all communities of color:

Safe, affordable, and stable housing in their community of choice



- Preservation and improvement of existing affordable housing stock.
- Increased investment in affordable housing that is culturally appropriate and in AAPI communities and neighborhoods.
- Increased access to affordable housing opportunities including public housing and other housing supports.
- Equitable and Accessible Affordable and Secure Mortgage Financing and Refinancing.
- Protection from housing discrimination.
- Access to linguistically and culturally appropriate information on housing rights, opportunities, and resources for renters, buyers, and owners.

Financial stability, security, and access to economic mobility



- Promotion of secure, stable jobs with livable wages and benefits.
- Protection and expansion of social safety net programs.
- Reform the tax code to be more equitable for all and build a more inclusive economy.
- Access to linguistically and culturally appropriate information and support services.
- Investment in secure and culturally appropriate financial products and strategies to promote savings and access to credit.
- Protection from predatory practices and products.
- Support for small businesses including micro-entrepreneurs and the self-employed to access capital, pilot innovation, and provide high quality jobs.

Healthy and thriving communities and neighborhoods



- Equitable access to federal place-based investments.
- Preserve culturally significant AAPI neighborhoods and communities at risk of displacement.
- Investment in physical and social infrastructure including transportation, public spaces, commercial districts, and community-based institutions.
- Active civic engagement and unencumbered access to neighborhood resources for youth, seniors, and families.
- Environmental justice for communities negatively impacted by climate change, highways, and toxics.
- Disaggregated data that reflects the needs for services and resources in low-income AAPI communities.

National CAPACD's Action Agenda

The action agenda will be the primary focus of National CAPACD's policy and advocacy work.

ACTION AGENDA

Equitable, Accessible, Affordable, and Secure Mortgage Financing and Refinancing

- **Account for additional needs and challenges faced by linguistically and culturally isolated populations in public investments:**
Include “linguistic and cultural isolation” as a priority in addition to geographic isolation in the HUD NOFA for housing counseling programs; ensure adequate award allocations for additional counseling time required with Limited English Proficiency (LEP) populations for services that include translation and family counseling; and establish concrete guidelines on value of organizations providing translation and outreach in AAPI and other LEP populations with respect to leveraged resources.
- **Restore uniform, equitable access to mortgage financing options on Hawaiian Home Lands:**
Renegotiate the HUD MOU with the State of Hawaii’s Department of Hawaiian Home Lands regarding Section 247 – Single Family Insured Mortgages on Hawaiian Home Lands restoring the LTV ratio from the current 75% to the standard 95%; and restoring the eligible uses of home equity to include debt consolidation, continuing education, and home improvement and repair.
- **Offer farmers financing for their homes and operations using an integrated approach with greater accountability of lenders to offer effective loss mitigation services:**
Ensure that guarantees by the Farm Service Agency (FSA), Rural Development at USDA, and Small Business Administration (SBA) adequately expand access to credit, while also protecting farmers when they face financial difficulties in order to avoid foreclosure. Preventing foreclosures will not only help farmers, but will also save taxpayer money in the form of reduced payouts on loan guarantees.
- **Include disaggregated data on AAPI borrowers in the Home Mortgage Disclosure Act (HMDA):**
HMDA race and ethnicity data should be expanded to include disaggregated AAPI data and language preferences of borrowers to better inform the areas of need for consumer education and protections.

ACTION AGENDA

Reform the tax code to be more equitable for all and build a more inclusive economy

- **Maintain and expand the Earned Income Tax Credit (EITC)** to ensure young adults, those under 25, and seniors over 65 have access to the EITC. It would be a key support to hard working low- and moderate-income families to have financial security.
- **Change the Mortgage Interest Deduction to a Tax Credit** to ensure that low- and moderate-income homeowners are also able to benefit from the Interest deduction and achieve the American Dream.

Support for small businesses including micro-entrepreneurs and the self-employed to access capital, pilot innovation, and provide high quality jobs

- **Change the VITA scope:** Eligibility should be based on annual business revenues rather than the current annual expenses of \$5,000. This would help many small businesses across the country. Currently, many are forced to go to private tax providers that do not file taxes correctly which prevents them from being approved for credit.
- **Expand the SBA micro-loan, SBA Community Advantage, and the CDFI programs:** Mainstream banks will not give loans below \$50,000 to the most innovative job creators. Include low-income AAPI populations as a priority for CDFI investments so that they can access capital to continue to grow and increase job creation.

Preserve culturally significant AAPI neighborhoods and communities at risk of displacement

Ensure existing residents and community businesses benefit from equitable Transit Oriented Development investments rather than face displacement.

- Mandate a land use analysis for investments, as well as a baseline of affordable housing, technical assistance, and access to capital for community businesses.
- Revise the definition of eligible uses of FTA “transit-related funds” to include affordable housing and eTOD planning.
- Create incentives for the disposition of temporary properties during construction and other existing transit agency owned and public properties to be made available for 50% affordable housing.
- Create greater community accountability in environmental assessments such as requiring community benefits agreements, planning engagement, equity scorecards, and neighborhood area plans.
- Provide mitigation for neighborhoods disproportionately impacted by highway and other federal transit development construction, especially pollution and other toxics resulting from federal projects.

Require funded community engagement processes in any publicly supported or tax credit development projects incorporating work with local community organizations, impact scorecards, and baseline community benefits.

- Require local municipalities to issue meaningful notifications of upcoming developments, including to stakeholder community organizations in the area.
- Invest in linguistically and culturally appropriate public education and engagement around planning process (potentially require 10% of project costs to be invested toward this).
- Shift resources that currently exist for local governments to conduct outreach around planned developments to local area nonprofits.
- Require an impact analysis based on socio-economic factors along with environmental impact, adding language specifically about potential impact on culturally significant communities.

Create a national hot markets program to address displacement of low-income renters and small businesses.

- Create incentives for cities to establish meaningful inclusionary zoning and rent control measures to prevent displacement of low-income residents, including guidance to prioritize at least 50% use of public land for fair access to affordable housing in hot markets
- Create a Cultural District designation that implements a series of protections for neighborhoods which serve as economic survival hubs for low-income communities of color.
- Invest in housing preservation through tenant services and education to stabilize housing stock, including increased flexibility of CDBG funds in hot markets.
- Create a national Section 8 Stabilization Program that extends or makes permanent contracts and increases vouchers in “hot market” cities.
- Improve regulation of home sharing companies such as AirBnB to protect existing affordable housing and ensure it does not replace long term affordable rental housing in hot markets.
- Develop guidance defining “hot market” neighborhoods under the Affirmatively Furthering Fair Housing Rule to guide prioritization of affordable housing investments.
- Support community businesses through a Community Business Tax Credit for relief on rising rents and real estate taxes.
- Create a Renters Tax Credit, particularly applicable in “hot market” cities with the goal that low-income renters pay no more than 30% of income toward rent with an income eligibility of 60% or below of the local median income.
- Create an anti-speculation tax on properties to reduce property flipping schemes, and investigation into predatory equity firms for violations of housing rights.
- Create an Office of Racial Equity within the U.S. Department of Housing and Urban Development to ensure Title VI of Civil Rights Act is upheld. The Office would provide oversight, impact analysis, and evaluation of programs for communities of color.

ACTION AGENDA

Disaggregated data that reflects the needs for services and resources in low-income AAPI communities

Ensure that federal agencies better collect data on AAPI communities overall – disaggregating existing data sets and increasing investment in obtaining better data that reflects the needs of low-income AAPI communities. Specific examples include:

- **2017 Housing Vacancy Survey:** Improved data collection in areas of high concentration of poverty will better inform all HUD programs as well as serve to leverage local and regional resources aimed at alleviating poverty. Additional surveying focused on top MSAs will reveal specific areas of need within low-income AAPI communities.
- **Home Mortgage Disclosure Act (HMDA):** Include disaggregated data on AAPI borrowers and language preferences in the Home Mortgage Disclosure Act.
- **Census 2020:** Improve data collection to capture sub-populations, as well as greater investment in outreach efforts in regions where low-income AAPIs reside.
- Collect disaggregated AAPI data on small business lending and practices.

Safe, affordable, and stable housing in their community of choice



Low-income AAPIs live in some of the most unstable housing conditions – more so than any other racial group. Many low-income AAPIs reside in hot market regions where rents are rising at unprecedented levels and affordable homeownership opportunities are limited. AAPIs are more vulnerable to discrimination in housing and live in overcrowded conditions, often in older housing stock in dire need of repair. These dynamics are causing high levels of displacement from neighborhoods that serve as a safety net for many, particularly for women, seniors, and those that are culturally and linguistically isolated.

AAPI homeowners face multiple barriers to homeownership including access to affordable loans and higher susceptibility to predatory products. Often due to a language barrier, those with limited-English proficiency have fallen prey to loan modification scams or agreed to loan terms they do not understand. In addition, AAPIs often face discrimination when buying a home. A study by the U.S. Department of Housing and Development found that AAPI homebuyers experienced adverse treatment in the housing market more than 20% of the time, comparable to the level of discrimination faced by African American homebuyers.

With these challenges, the following policy recommendations aim to preserve and improve existing affordable housing, encourage investment in the creation of affordable rental housing in AAPI communities, as well as increase access to good financing that will enable owners to build assets. In addition, we recommend policies that will help ensure strong servicing and support for linguistically and culturally isolated homeowners, create stronger protection from housing discrimination, and address critical language access issues.

Preservation and improvement of existing affordable housing stock

- Increase support and flexibility of Community Development Block Grants with 100% of investments benefiting low-income communities.
- Preserve funding for the Native Hawaiian Housing Block Grants.
- Maintain HOME and CDBG funds.
- Use HUD disaggregated data especially in places with high AAPI populations such as Hawaii and require community engagement in AFFH guidance.
- Increase public investments for the preservation and retrofitting of existing affordable rental housing.
- Create new programs within HUD to support tenant services for tenants living in the private market to preserve the affordable rental housing stock.
- Promote permanent affordable housing approaches in public and private housing developments including an inclusionary zoning mandate for any development using public subsidies and land trusts.
- Use Historic Preservation as a tool to preserve affordable housing and commercial sites.
- Improve utilization of energy conservation initiatives in AAPI communities through investments in in-language outreach.
- Change eligibility for support services and relocation assistance for new management of public housing under the Rental Assistance Demonstration program.

Increased investment in affordable housing that is culturally appropriate and in AAPI communities and neighborhoods

- Preserve the Low-Income Housing Tax Credit.
- Ensure that AAPI neighborhoods benefit from the National Housing Trust Fund (NHTF).
- Advocate for better accountability to AAPI neighborhoods in the implementation of the Community Reinvestment Act.
- Create low cost and easily accessible financing to acquire site control of properties in “hot markets” for potential affordable housing projects.
- Advocate for housing development and financing models that better accommodate extended family models within the Low-Income Housing Tax Credit project, Housing Choice Vouchers, SRO (single-room-occupancy) Development, and other publicly subsidized affordable housing programs.
- Facilitate increased use of smart growth approaches such as the accessory dwelling unit model in one to three family homes - promoting the creation of safe and affordable housing that accommodates extended families within existing housing stock.
- Incentivize permanent affordable housing approaches in public and private housing developments including inclusionary zoning and other similar approaches.

Increased access to affordable housing opportunities including public housing and other housing supports

- Housing Choice Vouchers:
 - Expansion of Housing Choice Vouchers (Section 8) including restoration of those lost due to sequester.
 - Improve eligibility for self-employed or cash-based earners.
 - Increase threshold of eligibility.
 - Reduce barriers for victims of domestic violence with children.
- Preserve the Low-Income Housing Energy Assistance Program (LIHEAP) and increase LIHEAP support levels during winter and summer months.
- Invest in increasing access for individuals across a diverse range of economic levels, including the homeless and extremely low-income.
- Ensure that the issues of income documentation for the self-employed are not barriers to accessing federally subsidized affordable housing.

Equitable, Accessible, Affordable, and Secure Mortgage Financing and Refinancing

OTHER PRIORITIES

- Expand the Native Hawaiian Loan Guarantee (Section 184A).
- Preserve and expand funding for Housing Counseling Assistance back to the FY2010 level of \$88 million.
- Address barriers to accessing affordable homeownership financing, such as income documentation, among independent contractors and the self employed.
- Increase support for Down Payment Assistance programs and expand eligibility threshold.
- Create affordable mortgage products for extended families.

Protection for households at risk of foreclosure and eviction

- Expand federal support for Tenant Eviction Prevention Legal Services.
- Maintain the National Foreclosure Mitigation Counseling program.
- Equal access to servicing and loss mitigation options for Native Hawaiians on all federally-guaranteed loans.

- Remove congressional limitation of barring Legal Services Corporation programs from serving undocumented immigrants, as well as certain immigrants who are in status.
- Develop guidance on loan modifications - removing all balloon payments in loan modifications – particularly those targeting seniors.
- Increase the use of principal reductions for mortgage modifications in accordance with HAMP.
- Make the expired Protecting Tenants at Foreclosure Act (PTFA) permanent, which would provide federal protections for renters living in foreclosed properties and provide renters at least 90 days' notice before being required to move after foreclosure.
- Urge Federal Housing Finance Agency to require principal reduction modifications to underwater homeowners.

Protection from housing discrimination

- Increase support for Fair Housing Assistance Program – particularly for in-language outreach and enforcement.
- Advocate for increased systemic testing in gentrifying communities – particularly of under-regulated affordable housing.
- Increase enforcement of Fair Housing laws in privately run co-op boards.
- Require community representation (based on local demographic analysis) on consolidated planning boards.
- Ensure that the promotion of mobility within the new Affirmatively Furthering Fair Housing (AFFH) rule does not come at the cost of disinvestment in concentrated communities of color.

Access to linguistically and culturally appropriate information on housing rights and resources for renters, buyers and owners

- Preserve and expand funding for Housing Counseling Assistance back to the FY2010 level of \$88 million.
- Promote increased linguistically appropriate services in the financial services industry.
- Integrate tracking of housing counseling referrals and preferred language on mortgage applications.
- Mandate housing counseling for affordable mortgage products.
- Increase accountability in the use of Attorney General Settlement dollars to go toward services.

Financial stability, security, and access to economic mobility



With many working in the service industries and in the cash economy, financial stability and security is a very real challenge for low-income AAPIs. Linguistic and cultural isolation prevents many from entering the financial mainstream. Limited access to good jobs, benefits, and support as well as credit, prevents low-income AAPIs from achieving real economic mobility.

National CAPACD's 2015 report, *Scrimping + Saving*, revealed that factors such as age, ethnicity, immigration status, and English language fluency significantly influence how AAPIs access financial information, services, and products. The research found that recent immigrants in particular faced lower rates of bank account ownership, greater reliance on cash for daily transactions, and an inability to conduct financial transactions in English (36%).

AAPI small businesses have always been a cornerstone of the AAPI community – with many turning to self-employment and business ownership as a pathway to greater economic security. This is particularly true for new immigrants who have few other options for joining the labor market. The 2007 Census Bureau Survey of Business Owners indicates that the number of Asian-owned businesses increased by 40.4% between 2002 and 2007, more than double the national average. Despite this tremendous growth, AAPI entrepreneurs continue to face a number of significant obstacles in establishing, growing, and sustaining their businesses including a lack of access to capital; poor or no credit; and language barriers. The 2007 Census Survey found that 19.4% of AAPI business owners reported speaking English 'not well', and 2.6% report 'not at all' speaking English.

To address these challenges, the following policy recommendations are focused on increasing wages and benefits, protecting social safety net programs, reforming tax codes to more equitably benefit low-income individuals, and passing comprehensive immigration reform. In addition, language access is a primary focus of recommendations in this area as well as investment in culturally appropriate products that promote savings and asset building for individuals and business owners.

Promotion of secure, stable jobs with livable wages and benefits

- Expand the Workforce Innovation Fund.
- Pass comprehensive immigration reform and establish repatriation agreements for deportees of Southeast Asia.
- Raise the minimum wage.
- Phase in minimum wage requirements for small businesses.
- Establish universal paid Family and Sick Leave.
- Authorize and appropriate funding through the Department of Labor for Asian American and Native American Pacific Islander Serving Institutions (AANAPISI) to provide training and placement programs in partnership with community-based organizations working with culturally isolated and underserved communities.

Protection and expansion of social safety net programs

- Preserve Social Security.
- Reformulate the Federal Poverty Rate. The current calculation does not accurately capture true levels of economic need because, among other problems, it does not account for a variety of different income sources nor for local variations in the cost of living. A more accurate approach - the U.S. Census's Supplemental Poverty Measure - is a good step in the right direction. A more accurate approach, however, would align with a living wage based on local costs and be tied to factors such as cost of child care.
- Increase access to safety net programs through the lifting of asset limits on SNAP, TANF, and LIHEAP.
- Lift asset limits on SSI to offer greater flexibility to families and preserve states' flexibility to waive asset limits.
- Ensure Medicaid-eligibility regardless of immigration status.
- Issue new guidance for federal agencies on use of the federal poverty rate and other measures in creation of new programs to combat poverty.

Reform the tax code to be more equitable for all and build a more inclusive economy

OTHER PRIORITIES

- Create a Federal Renters Credit, particularly applicable in “hot market” cities to ensure that low-income renters pay no more than 30% of income toward rent with an income eligibility of 60% of the local median income.
- Increase in the tax rate on capital gains as well as taxing in the same manner as ordinary income.
- Remove the cap on social security payroll tax.
- Allow ITIN holders to access EITC as they do the Child Tax Credit.
- Support tax code changes to encourage and incentivize employer-linked savings and SU retirement savings such as myRA, and make the Saver’s Credit refundable. Turning the credit into a matching contribution to the account would provide a greater incentive to save for low-income families, including Earned Income Tax Credit recipients.

Access to linguistically and culturally appropriate information and support services

- Expand the Volunteer Income Tax Assistance program (VITA).
- Authorize and appropriate funding of a full scale program based on the Family Financial Services pilot.
- Invest in education and outreach of EITC eligibility among citizens of Compact of Free Association (COFA) states.
- Improve VITA program model to include increased support for partnership with local community based organizations – particularly in linguistically and culturally isolated communities.
- Provide low-and-moderate income individuals, families, and communities of color with opportunities to access tax benefits at little or no cost through expansion of programs.

Investment in secure and culturally appropriate financial products and strategies to promote savings and access to credit

- Expand investment in Individual Development Accounts to promote savings and asset building for all income levels.
- Increase ability of consumers to use alternative forms of identification to access financial services.
- Improve data collection to better understand consumer access and usage.

Protection from predatory practices and products

- Support a strong and effective Consumer Finance Protection Bureau.
- Ensure consumers who have been impacted by predatory lending are not additionally penalized by reductions in credit ratings and are not adversely affected in their credit reports and scores.
- Support and enforce policies that encourage greater transparency regarding fees.
- Establish an ability to repay standard and minimum loan terms.
- Support the creation of a new and more transparent system to evaluate credit risk that integrates alternative risk profiles such as rental, utility, and child care payments that prove a borrower's credit worthiness.

Support for small businesses including micro-entrepreneurs and the self-employed to access capital, pilot innovation, and provide high quality jobs

OTHER PRIORITIES

- Expand funding for Minority Business Development Centers.
- Invest in linguistically and culturally appropriate training and resources for micro-entrepreneurs that create jobs in neighborhoods, not just high tech fields.
- Create incentives for the development of affordable commercial spaces for micro-entrepreneurs to pilot innovation.
- Modernize the Community Reinvestment Act to include business lending and investment services to micro-businesses.
- Increase access to lower-interest rate products through an expanded SBA microloan program.
- Produce more frequent and disaggregated data on business lending among small businesses and micro-entrepreneurs.
- Increase tax assistance resources for low- to moderate-income (LMI) entrepreneurs through improving the EITC, creating a New Entrepreneur Tax Credit, and ensuring the VITA program remains available to all low- to moderate- income entrepreneurs.

Healthy and thriving communities and neighborhoods



Many AAPI communities and neighborhoods around the country, located in high cost cities and often in transit accessible neighborhoods, are at risk of being lost today. Much of this is due to rising housing and commercial rents and real estate taxes, resulting from private development investments. A lack of accurate data that reflects the realities of high levels of poverty and overcrowded conditions in many low-income AAPI neighborhoods results in a lack of real investment on local levels in public supports for these communities. Many neighborhoods are in need of infrastructure investments to keep up with growth and improvement of transit, parks, and public spaces – essential quality of life factors. Linguistic and cultural isolation and lack of representation are significant barriers in empowering local communities to advocate for themselves. In addition, many low-income AAPI neighborhoods face challenges with local law enforcement unjustly targeting people of color.

The following policy recommendations, therefore, are focused on equitable investments and community engagement in development of neighborhoods and communities with a focus on preserving culturally significant AAPI neighborhoods. It includes issues ranging from civic engagement, police accountability, and improvement of public spaces. In addition, we focus here on data disaggregation to address long term needs, as well as environmental justice to ensure impacted communities have access to necessary resources.

Equitable access to federal place-based investments

- Expand Promise Neighborhoods.
- Expand Choice Neighborhoods.
- Preserve and expand use of Transit-Oriented Development Funds.
- Use the poverty line rather than Area Median Income in criteria for federal place based programs.
- Create “Promise-like” neighborhoods to prevent displacement and build resiliency in “hot market” neighborhoods, including a Renters Tax Credit and Section 8 stabilization programs.
- Revise the Choice neighborhood model to be more conducive to community-building, i.e. not just focus on needs of seniors, but families as well.
- Support the Upward Mobility Project and ensure that low-income AAPI communities benefit from it- the President’s proposed \$1.5 billion of flexible federal funding available to ten states and/or communities to expand promising and evidence-based approaches to achieving better outcomes for children and improved family self-sufficiency.
- Ensure that local community boards that drive Federal investments adequately reflect the ethnic and racial populations they represent.

Investment in physical and social infrastructure including transportation, public spaces, commercial districts, and community-based institutions

- Extend the New Market Tax Credit.
- Preserve and expand the 21st Century School Fund.
- Improve ability to leverage programs to increase investments in partnerships among AAPI community based organizations and AAPI-serving institutions.
- Expand support for Census outreach.

Active civic engagement and unencumbered access to neighborhood resources for youth, seniors, and families

- Authorize and appropriate funding for a Parks for All program – investing in outreach and programming by local parks departments and immigrant communities, modeled on the NYC Immigrants and Parks Collaborative.
- Maintain investments in Community Health Centers, National Health Service Corps, and Teaching Health Centers program.
- Remove exemptions for unjust racial profiling by state and local law enforcement agencies in the Department of Justice Guidance Law to address the unjust surveillance and targeting of communities and neighborhoods.
- Support for anti-gun violence initiatives that address the root causes of violence, do not target communities of color, and are created towards the healing of communities-- not toward increasing the carceral system.
- Enforce the Voting Rights Act, particularly in jurisdictions where Section 203 applies-localities where there are more than 10,000 or over 5 percent of the total voting age citizens in a single political subdivision who are members of a single minority language group, have depressed literacy rates, and do not speak English very well.
- Invest in recruitment of poll workers with language capacity where Section 203 applies.

Environmental justice for communities negatively impacted by climate change, highways, and toxics

- Develop specific FEMA and HUD programs for displaced migrants from the COFA islands seeking housing, relocation assistance, and services.
- Provide mitigation for neighborhoods disproportionately impacted by highway pollution and other toxics.
- Include greater focus on neighborhood-wide energy conservation strategies in environmental impact statements to include factors such as storm water usages and reduction of greenhouse gases.

Creation of an Office of Racial Equity within the U.S. Department of Housing and Urban Development

- Establish an agency to ensure Title VI of Civil Rights Acts is upheld. The Office would provide oversight, impact analysis, and evaluation of programs on communities of color. Through this effort, our goal is to ensure that low-income AAPIs benefit from key federal programs, particularly those allocated through state and local processes. This will be modeled on the Office of Minority Health as well as existing examples on the local level such as those in Madison, WI, and Minneapolis, MN and Seattle's Racial and Social Justice Initiatives.