December 29, 2017

J. Paul Compton  
General Counsel  
U.S. Department of Housing and Urban Development  
451 Seventh Street, SW  
Washington, DC 20410

Dear General Counsel Compton:

Formed in 1933, the National Association of Housing and Redevelopment Officials (NAHRO) represents over 20,000 individual and agency members. Collectively, our membership manages almost 1 million affordable housing units and administers 1.7 million housing choice vouchers. Many of NAHRO’s members are also involved in the administration of federal funding through community planning and development programs. NAHRO works to support policies that help housing agencies best meet the needs of their local communities.

Recently, a Federal Court preliminarily enjoined HUD’s suspension of its mandatory Small Area Fair Market Rents (FMRs) rule. The rule required local agencies to implement SAFMRs by January 1, 2018…three days from now. Given that many agencies were relying on the additional time, proffered by the suspension, to implement Small Area FMRs, a January 1st implementation is likely unrealistic and unreasonable.

In an effort to assist our members navigate this situation, we are asking that your office provide prompt guidance.

NAHRO members receive reduced federal resources, but are expected to implement a myriad of existing (and new) program rules each year. Because they are mission driven, they perform heroically to get their work done. In addition to funding restraints, implementation of this rule will also be hampered by inadequate time.

Thank you for your speedy attention to this matter.

Sincerely,

Adrianne Todman,  
Chief Executive Officer

CC:  
Dominique Blom, General Deputy Assistant Secretary for the Office of Public and Indian Housing  
Beth Zorc, Principal Deputy General Counsel