May 28, 2013

The Honorable Shaun Donovan
Secretary
U.S. Department of Housing and Urban Development
451 7th Street S.W.
Washington, DC 20410

Dear Secretary Donovan:

As our nation seeks to ensure a sound fiscal future for all Americans, organizations representing the interests of agencies and professionals that administer federal affordable housing programs are working to achieve two straightforward but critically important goals: the restoration of responsible program funding levels and the establishment of a more rational, less burdensome regulatory environment. The National Association of Housing and Redevelopment Officials is working tirelessly to secure both of these indispensable outcomes. Any organization or individual advocate that shares our commitment to these objectives will find in us a willing partner.

NAHRO recognizes and respects that organizations must choose their own path forward to effectuate meaningful program reform. The course that NAHRO has charted is one that we believe reflects the needs of our members as well as our own mission, vision, and organizational values. NAHRO’s strategy combines the pursuit of comprehensive regulatory relief with a legislative agenda focused on the enactment of long-overdue statutory reforms that, taken together, will enable our members to responsibly serve those in need at less cost to the federal government.

Regarding regulatory reform, NAHRO’s efforts reflect a belief that the current funding environment represents a full-blown crisis that has placed our members’ operations at imminent risk of collapse. We believe that HUD should act with all deliberate speed to implement the broad array of regulatory reforms that NAHRO has advocated for nearly a decade. (A summary of counterproductive regulatory requirements and NAHRO’s recommendations for addressing them can be found in our April 1, 2013 letter to the Deputy Secretary.) The deleterious effects of unnecessary regulatory and administrative burdens, exacerbated by the recent tilt toward austerity, have compounded ongoing operational concerns at housing and redevelopment authorities across the country. Local agencies are reaching their breaking points; now is the time for meaningful action.

On Capitol Hill, our legislative activities are aimed at achieving both the restoration of funding levels that reflect communities’ needs and the enactment of common-sense statutory reforms. As we have done for the past ten years, NAHRO continues to prioritize the enactment of legislation that will reform and strengthen the public housing and Section 8 voucher programs.
NAHRO’s track record of advocacy in this area is clear and a matter of public record, and we remain committed to securing passage of legislation that best meets the needs of our members and those they serve. Given current fiscal challenges, a bill that provides program administrators with the flexibility they need to maximize the use of limited resources to address local needs is the right path forward. To that end, whether it is included in comprehensive reform legislation or advanced through a stand-alone measure, NAHRO favors a significant expansion of the Moving-to-Work (MTW) demonstration and believes existing MTW agreements must be protected. We will also work to rebalance HUD’s risk-monitoring regime while providing small agencies with substantial relief through the enactment of the Small Public Housing Agency Opportunity Act of 2013.

We think it is important that you know where NAHRO stands. In working to implement our organizational priorities, we are committed to obtaining the best achievable result for our members. Where we share with others common goals for our members and for the low- and moderate-income families they serve, it is our hope that we can stand together and work in partnership to ensure that what’s next for our industry is better than what’s come before.

Sincerely,

Saul N. Ramirez, Jr.
Chief Executive Officer