April 7, 2017

Jemine Bryon
General Deputy Assistant Secretary for Public and Indian Housing
Office of Public and Indian Housing, US Department of Housing and Urban Development
451 7th Street S.W.
Washington, D.C. 20410

Dear General Deputy Assistant Secretary Bryon,

The National Association of Housing and Redevelopment Officials (NAHRO) represents more than 3,100 agencies and over 20,000 individual members and associates. Collectively, our membership manages over 970,000 public housing units, or approximately 83 percent of the entire inventory. NAHRO works to support policies that promote regulatory and administrative relief to housing authorities so that they may best meet the needs of their communities. To promote these goals, NAHRO strongly advocated for triennial recertifications for fixed income residents and was pleased to see language permitting this included in the Fixing America’s Surface Transportation (FAST) Act (HR 22), signed into law by President Obama on December 4, 2015.

Language permitting triennial recertifications was a hard-earned and significant win for PHAs across that country that are currently facing historically low levels of federal funding. NAHRO was pleased to see the “Streamlining Administrative Regulations for Multifamily Housing Programs and Implementing Family Income Reviews under the Fixing America’s Surface Transportation (FAST) Act” interim final rule published in the Public Inspection section of the Federal Register on January 19, 2017.

NAHRO understands that publication of the interim final rule in the Federal Register was delayed due to the President’s “Regulatory Freeze Pending Review” memo, issued on January 20. The regulatory freeze required agencies to withdraw any regulations that had not yet been published in the Federal Register and extend the effective date of any regulations that have not become effective as of January 20, 2017 by 60 days.

Now that the 60 day regulatory freeze has ended, NAHRO requests that HUD prioritize the republication of the interim final rule as soon as possible, so that PHAs may take advantage of the administrative relief that triennial recertifications will bring. NAHRO is deeply interested in HUD’s expedient implementation of this policy and is willing to provide assistance in any way we can.

Stephen W. Merritt, PHM, President; Carl S. Richie, Jr., NCC, NAHRO Fellow, Senior Vice President; Julie Brewen, Vice President-International Research and Global Exchange; Donna Brown-Rego, Vice President-Member Services; Donovan Duncan, Vice President-Community Revitalization and Development; Duane Hopkins, Vice President-Professional Development; Richard Leco, PHM, Vice President-Commissioners; Regina Mitchell, SPHM, PHM, Vice President-Housing; John F. Bohm, Acting Chief Executive Officer.

e-mail: nahro@nahro.org  web site: www.nahro.org
Please feel free to call me at 202-580-7213 if you have any questions or would like to discuss this further.

Thank you for your time and consideration on this important matter.

Sincerely,

Eric Oberdorfer
Policy Advisor, Public and Affordable Housing
National Association of Housing and Redevelopment Officials