July 26, 2016

Good Afternoon, I am Georgi Banna, Director of Policy and Program Development and on behalf of the National Association of Housing and Redevelopment Officials (NAHRO), I am pleased to offer the following comments to the MTW Advisory Committee.

NAHRO understands the importance of directing one specific policy to each MTW expansion cohort that will be evaluated, we caution against any policy proposals that limit PHA flexibility and fungibility, as these components are what make the MTW demonstration so successful for currently participating agencies. Although NAHRO understands HUD’s need to provide oversight and evaluation of the policy provision, time-consuming and overly burdensome reporting requirements may prevent PHAs (especially for small PHAs) from being able to use their MTW designation in the most practical and cost-efficient manner. NAHRO also wants to ensure the importance of local discretion is built into the MTW demonstration to allow PHAs to meet the core goals of the program: cost effectiveness, self-sufficiency, and housing choice.

Specifically on the Potential Policy Intervention of Increasing Housing Choices for Low-Income Families, we would like to highlight two of the specific policies that NAHRO provided in its response to HUD’s Request for Specific Policy Proposals.

1. **Mobility Counseling – Both Pre- and Post-move**

   - Pre-move counseling should include explaining the benefits of moving to high-opportunity areas to tenants, housing search assistance (especially in neighborhoods that tenants may be less familiar with), help improving credit scores, and assistance saving for security deposits.
• Post-move counseling should provide assistance once the family moves and is adjusting to the new neighborhood. Offering counseling post-move increases the likelihood that the family will remain and not move back to a lower-opportunity neighborhood.

2. Location Based Strategies

• Current MTW agencies in high cost locations have been able to purchase properties in higher-opportunity neighborhoods for project-based vouchers through the Low-Income Housing Tax Credit (LIHTC) and other funding sources.

• This allows PHAs to keep rents lower in higher-opportunity neighborhoods, as private landlords would increase rents along with the market.

• Lifting the cap on the number of vouchers that PHAs are allowed to project-base in high-opportunity neighborhoods could help PHAs purchase more properties to provide affordable housing in neighborhoods experiencing increasing rental costs.

NAHRO is appreciative of the opportunity to provide comments to the MTW Advisory Committee on these important MTW issues. NAHRO is deeply supportive of this Committee’s and HUD’s quick and thoughtful actions to move the expansion forward. Thank you.