July 28, 2016

Good afternoon, my name is Eric Oberdorfer, and I am the Policy Advisor for Public and Affordable Housing at NAHRO. I thank you all for the opportunity to comment today on this call.

NAHRO understands the importance of directing one specific policy to each MTW cohort, however we caution against any policy proposals that limit PHA flexibility and fungibility, as these components are what make the MTW demonstration so successful and often lead to the most effective cost-saving mechanisms for MTW agencies.

Although NAHRO supports this MTW expansion, we want to ensure that any proposed policies do not divert the local discretion built into the MTW demonstration. This is especially true regarding self-sufficiency programs. Local economic and employment conditions vary dramatically across the country, and agencies that participate in the MTW expansion must be afforded the ability to create self-sufficiency programs that meet the local needs and realities of their communities, if they feel there is a need for these programs at all. One-size-fits-all self-sufficiency policy programs would be too restrictive and would not meet this mandate.

Although NAHRO understands HUD’s need to provide oversight and evaluation, one of the most critical components of the MTW demonstration are the cost-saving mechanisms that PHAs can utilize to operate more effectively and efficiently. Time-consuming and overly burdensome reporting requirements may prevent PHAs from being able to use their MTW designation in the most practical and cost-effective manner. This is especially true for smaller agencies. As you are aware, half of all agencies entering the MTW demonstration through the expansion must have 1,000 or less aggregate voucher and public housing units. Smaller agencies have less capacity, and as such, may be hesitant to enter into a program that would require overly burdensome reporting and evaluation, effectively restricting their ability to participate in the demonstration. This would be a shame, as small agencies would greatly benefit from the operational cost-savings that the MTW demonstration was intended to provide.

As I conclude, I would also like to add as a point of clarification that not all small agencies are rural and not all rural agencies are small. I think this will be critical to remember moving forward.

I thank you again for the opportunity to comment and listen today. I appreciate everyone’s time and efforts in moving this expansion forward.