July 24, 2018

Dear Deputy Assistant Secretary for Public Housing and Voucher Programs Bastarache:

On behalf of the National Association of Housing and Redevelopment Officials (NAHRO), I would like to offer the following letter to the United States Department of Housing and Urban Development (HUD or the Department) on the topic of updating Department handbooks.¹

Formed in 1933, NAHRO represents over 20,000 housing and community development individuals and agencies. Collectively, our members manage over 970,000 public housing units, 1.7 million Housing Choice Vouchers (HCVs), and receive over $1.5 billion in Community Development Block Grant (CDBG) and HOME Investment Partnerships (HOME) Program funding to use in their communities. NAHRO has the unique ability to represent public housing agencies, local redevelopment agencies, and other HUD grantees of all sizes and geography.

The National Association of Housing and Redevelopment Officials makes the following recommendation:

- The Department should regularly update its program handbooks to accurately reflect all current program requirements without adding any additional requirements that would add time or staff requirements.

The Department’s handbooks are out of date and reflect neither current law, regulation, nor guidance. For example, the handbook for the Housing Choice Voucher program has not been updated since the turn of the millennium. The lack of regularly updated handbooks makes administering the Housing Choice Voucher program difficult, particularly for smaller agencies for whom navigating through multiple guidance notices may not be an efficient use of time. The handbooks substantially ease program administration because they provide a single place where PHA staff can find all the necessary and up-to-date information they need to run a program.

The National Association of Housing and Redevelopment Officials believes that it is crucial for these handbooks to be updated immediately and then to be regularly updated according to a set schedule. While NAHRO appreciates the constraints that HUD operates under, we believe that this issue is one that needs to be higher prioritized by HUD.

The National Association of Housing and Redevelopment Officials thanks the Department for continuing to work collaboratively and for continuing to address stakeholder concerns in a timely manner. If there

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¹ The term “guidebook” and “handbook” are used synonymously in this letter.
are any additional questions or concerns about this issue, please feel free to contact me at tgurjal@nahro.org.

Sincerely,

Tushar Gurjal
Policy Analyst, Section 8 Programs