



## National Association of Housing and Redevelopment Officials

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Department of Housing and Urban Development  
451 7<sup>th</sup> Street, SW  
Room 10276  
Washington, DC 20410-0500

To Whom It May Concern:

On behalf of the National Association of Housing and Redevelopment Officials (“NAHRO”), I would like to offer the following comments to the United States Department of Housing and Urban Development (“HUD” or “the Department”) in response to the passage of the Consolidated Appropriations Act, 2022 creating new general-purpose vouchers (which HUD refers to as “fair share vouchers”) and allocating \$200 million for their use.

Formed in 1933, NAHRO represents approximately 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, 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.

Members of NAHRO are strongly committed to maximizing voucher utilization across the nation. It is in this spirit that we offer comments on the new “fair share vouchers.” After consulting with our members, NAHRO has three points it would urge HUD to consider in the creation of these vouchers.

### Terms and Conditions

The statutory language creating fair share vouchers provides HUD with discretion in how they are created. The legislative language creating fair share vouchers states that “[HUD] may specify additional terms and conditions to ensure that public housing agencies provide vouchers for use by survivors of domestic violence, or individuals and families who are homeless . . . or at risk of homelessness . . . .” This language provides HUD with discretion over whether it should add additional terms and conditions.

While NAHRO shares Congress’s goal to house the vulnerable populations mentioned in the statutory language, we believe that the individual housing agency should decide how they want to serve these populations based on the needs of their community. The Department should not add additional terms or conditions at the national level, but should distribute these vouchers as general, all-purpose vouchers. Distributing these vouchers without encumbering them would allow housing agencies to decide how best to use the vouchers in their community.

**Patricia Wells**, MPA, CME, President; **George Guy**, Senior Vice President; **Lucille Boss**, Vice President-Commissioners; **Sharon L. Carlson**, CME, SPHM, PHM, SHM, CRPBRA, CSO-PH, CSEC-PH Vice President-Professional Development; **Irma Gorham**, PHM, Vice President-International Research and Global Exchange; **Duane Hopkins**, Vice President-Budget & Administration; **Milet Hopping**, PHM, Vice President-Member Services; **Peter F. LiFari**, Vice President-Community Revitalization and Development; **Wayne Pollard, Jr.**, Vice President-Housing; **Michael Gerber**, Interim CEO

Past experience has also shown that adding “terms and conditions” to vouchers will reduce the rate at which those vouchers are utilized. Adding “terms and conditions” will increase the processing time for each voucher as the PHA will have to retool how it operates its voucher program to fit within the confines of the “terms and conditions.” Conversely, general purpose vouchers, which are not limited in any way, are more likely to be utilized quickly. NAHRO strongly urges HUD to not add any additional terms or conditions at the national level, but instead to distribute these vouchers as general, all-purpose vouchers.

### **Staggering Allocation**

In the process of allocating vouchers, NAHRO believes that HUD should inform each PHA of the number of new fair share vouchers that it is eligible to receive and give the PHA the option to receive those vouchers all at once or in multiple batches. If the PHA chooses to receive the vouchers in multiple batches, the PHA should have the option of turning down any subsequent batch of vouchers. This will allow PHAs that believe themselves to be in hard-to-lease markets to gradually introduce more vouchers and test how well they are being leased before adding additional vouchers. For those PHAs that are certain that they can lease their vouchers quickly, an option to receive the vouchers as a lump sum will allow them to start issuing vouchers immediately. This method of allocation will ensure that PHAs with tight markets receive vouchers more slowly than PHAs in less difficult markets. It will also ensure that utilization rates do not plummet if PHAs in hard-to-lease areas are receiving vouchers quickly.

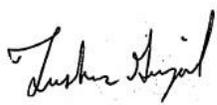
A second advantage of staggering allocation of these new vouchers is that PHAs will be able to scale up their workforce manageably. Since the start of the pandemic, many organizations have had trouble hiring additional staff. PHAs are no exception. Adding a large voucher increment more quickly than the PHA is able to hire staff has the potential to disrupt a PHA’s workforce and lead to suboptimal operations. Allowing the PHA to choose how quickly the vouchers are allocated will allow PHAs the flexibility to appropriately manage their operations. This will minimize disruptions.

### **Provide Sufficient Time to Lease Up**

In judging the efficacy of PHAs using these vouchers, HUD should provide sufficient time (e.g., at least 18 months) for any individual PHA to lease them up before considering them for recapture. Every housing market in the country is different, and the path to high utilization may sometimes require more time in some areas than others. The Department should consider that PHAs are operating under different conditions in different housing markets. Providing PHAs with a sufficient amount of time to lease up their vouchers allows for differences in housing markets and factors outside the control of PHAs.

The National Association of Housing and Redevelopment Officials thanks the Department for the opportunity to share these comments. If the Department has any questions or comments on these points, or any other issue, please feel free to reach out to me at [tgurjal@nahro.org](mailto:tgurjal@nahro.org).

Sincerely,



Tushar Gurjal  
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