



National Association of Housing and Redevelopment Officials

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January 28, 2025

U.S. Department of Housing and Urban Development
451 7th St. SW, Room 10276
Washington, DC 20410-0500

Re: Temporary Pause of Agency Grant, Loan, and Other Financial Assistance Programs

Dear Acting Secretary Ammon:

On behalf of the National Association of Housing and Redevelopment Officials (NAHRO), I offer the following comments to the United States Department of Housing and Urban Development (HUD or the Department) in response to a memorandum issued by the Office on Management and Budget (OMB) titled "Temporary Pause of Agency Grant, Loan, and Other Financial Assistance Programs" published on January 28, 2025.

The National Association of Housing and Redevelopment Officials, which was established in 1933, is a membership organization of approximately 26,000 housing and community development providers and professionals throughout the United States. NAHRO members create and manage affordable housing for low- and middle-income families and support vibrant communities that enhance the quality of life for all. Our members administer more than 3 million homes for more than 8 million people.

The letter is divided into two sections. The first section provides a brief background on the temporary pause of Federal financial assistance, while the second section requests clarification of the scope of the temporary pause of Federal financial assistance. While the letter provides additional detail our primary asks are the following:

- Federal rental assistance programs including--but are not limited to--the Housing Choice Voucher program, the Public Housing program, Project-based Rental Assistance, and other similar federal rental assistance programs must be excluded from the temporary pause of Federal financial assistance;
- The Department must clearly provide information to its housing partners, including public housing agencies, that clarifies that these programs are excluded;
- The Department must ensure that all systems related to drawing down funds for federal rental assistance are operational, including eLOCCS; and
- All funding appropriated by Congress, including community development grants and other funding necessary to modernize and improve affordable units, should be obligated.

George Guy, President; **Sean Gilbert, SPHM, NAHRO Fellow**, Senior Vice President; **Renee Smith NCC**, Vice President - Commissioners; **David S. Gates, CSO-PH, CSEC-PH, CMPO, C-PHM, CME** Vice President - Professional Development **Jeff du Manoir**, Vice President-International Research and Global Exchange; **Duane Hopkins, CME**, Vice President-Budget & Administration; **Shaunté Evans MBA, PHM**, Vice President-Member Services; **Grace Stepter**, Vice President-Community Revitalization and Development; **Lanita Hillen**, Vice President-Housing, **Mark Thiele**, CS-PHM, CME, CMVO, NCC, Chief Executive Officer
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Background

In its document titled “Temporary Pause of Agency Grant, Loan, and Other Financial Assistance Programs,” the Office of Management and Budget states that Federal agencies are required to “identify and review all Federal financial assistance programs and supporting activities consistent with the President’s policies and requirements.” To implement these orders each agency should conduct a “comprehensive analysis of all their Federal financial assistance programs” and must “temporarily pause” activities “related to obligation or disbursement of all Federal financial assistance, and other relevant agency activities . . .” The document notes that “OMB may grant exceptions allowing Federal agencies to issue new awards or take other actions on a case-by-case basis.” It also notes that Federal financial assistance excludes “assistance received by individuals.” The document states that the temporary pause will begin on January 28, 2025.

In a subsequent document published by OMB that serves as a question-and-answer document, OMB notes that “. . . any program that provides direct benefits to Americans is explicitly excluded from the pause and exempted from this review process . . . [and] [f]unds for small businesses, farmers, Pell grants, Head Start, rental assistance, and other similar programs will not be paused.”

Scope of Memorandum

The National Association of Housing and Redevelopment Officials asks that the U.S. Department of Housing and Urban Development unequivocally state that this temporary pause does not apply to the following programs:

- The Housing Choice Voucher program;
- The Public Housing program;
- Project-based Rental Assistance; and
- Other similar federal rental assistance programs.

Maintaining these programs is crucial to ensuring the livelihood of 2.3 million families in the Housing Choice Voucher program, 800,000 families in the Public Housing program, 1.3 million families in Project-based Rental Assistance, and thousands of others in other rental assistance programs.

Each of these programs provide a myriad of benefits for families including providing a home. For example, the Housing Choice Voucher program can, in certain instances, provide improvements to the physical and mental health of adults and can increase lifetime earnings for children. The Housing Choice Voucher program celebrated its 50th anniversary in 2024 and during its entire existence housing agencies in the voucher program have been known for consistent, reliable payments to landlords. The Department should not begin missing payments now. The Federal government, through HUD, cannot default on its obligations to housing agencies, landlords, and millions of Americans.

These programs should be exempt from the pause for several reasons. First, these programs offer “assistance received by individuals,” which the OMB memorandum directs to be exempt from the pause. Second, these programs ensure that millions of families are able to stay in homes which qualifies them as “rental assistance” which the OMB question-and-answer document explicitly excludes from the pause. Third, even if the explicit mention of these programs in the above documents is not convincing, OMB has the authority to provide case-by-case exemptions and should do so here to prevent the potential loss of housing for millions of people.

Finally, the Department must ensure that its portals related to drawing down funds are operational and allow for housing agencies to draw funds to be used for these programs. Additionally, it should ensure that funds for the Housing Choice Voucher program are being disbursed in a timely manner.

We ask that HUD quickly clarify that the federal rental assistance programs mentioned above are not subject to the Federal financial assistance pause. 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 Director of Policy and Legislative Affairs Eric Oberdorfer at eoberdorfer@nahro.org.

Sincerely,

A handwritten signature in black ink, appearing to read "M. Thiele". The signature is written in a cursive style with a horizontal line above it.

Mark Thiele
NAHRO, CEO