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November 2, 2026

U.S. Department of Housing and Urban Development
Office of General Counsel
Regulations Division
451 7th Street SW, Room 10276
Washington, DC 20410-0500

Re: Revision of Operations Notice for the Expansion of the Moving to Work Demonstration Program [FR-5994-N-07]

To Whom It May Concern:

On behalf of the National Association of Housing and Redevelopment Officials (NAHRO), I offer the following comments in response to HUD's proposed rule titled "Revision of Operations Notice for the Expansion of the Moving to Work Demonstration Program."

Established in 1933, NAHRO is a membership organization of more than 26,000 housing and community development providers and professionals throughout the United States. Our members create and manage affordable housing for low- and middle-income families and support vibrant communities that enhance the quality of life for all. NAHRO members administer more than 3 million homes for more than 8 million people. NAHRO members include 89 Moving to Work (MTW) Demonstration agencies nationwide.

Background

Established in 1996, the MTW Demonstration was created by Congress to give Public Housing Agencies (PHAs) flexibility in testing and developing alternative approaches meant to increase cost effectiveness, promote self-sufficiency, and increase housing choice. Initially, the program started with 39 agencies, and it has now grown to approximately 137 MTW PHAs nationwide. These agencies use their flexibility to address local housing needs and advance economic opportunities for residents within their communities.

General Comments

The National Association of Housing and Redevelopment Officials appreciates the following revisions made by HUD in this notice including eliminating the 10% limit on local non-traditional activities and streamlining planning and reporting requirements.

Sean Gilbert, PHM, SPHM, NCC, NAHRO Fellow, President; **Ivory Mathews**, Senior Vice President; **Marsha Parham-Green, CME, CPHM, CSI-HQS**, Vice President - Budget & Administration; **Joe Grisson, NCC**, Vice President - Commissioners; **Taryl Bonds**, Vice President - Community Revitalization & Development; **Angie Garcia-Nguyen**, Vice President - Housing; **Lisa Baker**, Vice President - International Research and Global Exchange; **Beverly Banks**, Vice President - Member Services; **Diane Cohen, CME, NCC**, Vice President - Professional Development; **Mark Thiele, C-PHM, CME, CMVO, NCC**, Chief Executive Officer

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Eliminating the 10% cap on local non-traditional activities will be beneficial to agencies in that it will allow them to better allocate resources where needed without unnecessary restrictions. Additionally, HUD's decision to streamline reporting requirements by allowing Expansion Agencies to submit a single annual Form HUD-50900 Expansion instead of their annual PHA plans with the attached MTW Supplement will create a more efficient process that reduces repetitive reporting requirements. NAHRO strongly supports removing any duplicative requirements that create additional burden and potential confusion among agencies.

Regarding the elimination of language relating to the consideration of disparate impact, NAHRO would like to clarify that this does not exempt MTW agencies from their obligations under the Fair Housing Act. This should be mentioned and clarified within the Operations Notice to prevent confusion among Expansion Agencies.

Conclusion

In conclusion, NAHRO supports more flexibility and eliminating repetitive reporting requirements for PHAs—in this case Expansion Agencies. Furthermore, NAHRO believes that HUD should be very clear and transparent with PHAs about their obligations under the Fair Housing Act. We appreciate the opportunity to comment on this topic.

Sincerely,



Steven Molinari
Policy Analyst