



2024 Legislative & Regulatory Agenda Policy Priorities

NAHRO'S LEGISLATIVE AND REGULATORY FOCUS

We want *adequate and responsible funding* that provides housing and community development agencies the ability to implement *holistic and equitable approaches to community development* as well as *build and preserve affordable units through streamlined programs* that allow for *creative, local solutions*.

Adequate and Responsible Funding

- Finalize annual appropriations on time and avoid yearlong continuing resolutions that have disastrous impacts on housing and community development programs.
- Maintain the federal commitment to housing and community development by prioritizing the appropriations process to ensure that HUD is not impacted by a government shutdown.
- Refrain from indiscriminate cuts to discretionary spending to address the nation's fiscal challenges.
- Fully fund the Public Housing Fund, including the Public Housing Operating and Capital Fund programs. This includes accounting for significant program increases due to insurance premiums and inflation.
- Preserve the nation's public housing by fully funding the Public Housing Capital Fund backlog.
- Fully fund the Public Housing Operating Fund shortfall as PHAs have seen an unprecedented rise in operating costs.
- Fully fund the Housing Choice Voucher (HCV) Program.
- Make the HCV Program universal and add a service fee with each voucher so that all eligible households who qualify for a voucher can receive a voucher.
- Fully fund HCV administrative fees to ensure that Public Housing Agencies (PHAs) can help their residents find safe, secure housing in extremely tight rental markets across the country.
- Ensure Renewal Funding Inflation Factors (RFIFs) reflect the actual increased costs of running the HCV Program and appropriately track increases in Fair Market Rents.
- Fully renew Project-Based Rental Assistance (PBRA) funding.
- Make Emergency Housing Vouchers (EHV) permanent with continued renewal funding.
- Urge HUD to develop new methods for calculating Fair Market Rents, including collaborating with the Census Bureau to improve rental data collected in the American Community Survey, as the data frequently lags behind market rental prices and impact program costs.
- Expand funding for programs that increase self-sufficiency and stability in low-income families, such as the Family Self-Sufficiency (FSS) Program, Resident Opportunities and Self-Sufficiency (ROSS) Program, and Jobs Plus.

Holistic and Equitable Approaches to Community Development

- Fund robust supportive services, including mental health care, to help stabilize families so they can successfully find housing and remain in their homes.
- Fund legislation and regulations that advance diversity, equity, and inclusion as crucial components to healthy communities, with a focus on factors within the scope of control of housing and community development agencies.
- Ensure all families have access to neighborhoods of opportunity through mobility programs and Enhanced Payment Standards.
- Fund climate resilient approaches to development and finance, including planning, design, and recovery before and after natural disasters strike, and work with insurance providers to ensure that existing affordable housing developments have access to comprehensive, affordable insurance policies regardless of location.
- Require all property owners (public and private) to report on-time rental payments to credit bureaus to help residents establish or build their credit.

Build and Preserve Affordable Units through Streamlined Programs

- Maximize existing housing preservation efforts and increase housing inventory by creating new repositioning options and making existing repositioning options (e.g., Rental Assistance Demonstration (RAD), Section 18, Voluntary Conversion, Mixed-Finance Public Housing Development) available to all PHAs that voluntarily want to use them.
- Exclude housing from the Private Activity Bond Cap, so additional bonds can be used to promote public housing preservation.



- Prohibit source of income discrimination.
- Allow HCV Housing Assistance Payment (HAP) funding to be used for short-term financial assistance (e.g., security deposits, application fees, etc.) and for maintaining a risk mitigation fund to help residents successfully lease up in tight rental markets with limited housing availability.
- Improve educational options for low-income Americans by improving internet/digital access in low-income areas, providing universal access to preschool, expanding the Book Rich Environments program, and highlighting the impact that under-resourced schools have on education gaps and upward mobility through improved federal cooperation and data sharing.
- Remove the Community Service and Self-Sufficiency Requirement (CSSR), which remains an inequitable policy that has little benefit for residents.
- Strengthen the Low-Income Housing Tax Credit (LIHTC) by permanently increasing the allocation by 50 percent and lowering the “50 Percent Test” to 25 percent.
- Allow PHAs participating in the RAD Program additional options to increase contract rents to better reflect local rental prices including revising HUD’s Operating Cost Adjustment Factor (OCAF) methodology to allow for the inclusion of debt service coverage as part of the calculation for annual rent increases.

- Increase cost-efficiencies in affordable housing rehabilitation and development by adjusting Davis Bacon wage requirements to inflation.
- Increase the small grants and de minimis thresholds and exempt housing and community development programs from Build America, Buy America (BABA) requirements.
- Provide creative solutions to help PHAs take ownership of USDA Rural Housing Service properties.
- Refrain from including indicators outside of a PHA's control when revising Public Housing and Section 8 Management Assessment Systems.
- Provide an adequate timeline for PHAs and other impacted agencies to implement changes to income reviews and asset limitations required by the Housing Opportunity Through Modernization Act of 2016 (HOTMA).



Creative, Local Solutions

- Reduce administrative burdens that decrease efficiencies by streamlining housing and redevelopment statutes and regulations to meet existing funding challenges and provide PHAs additional flexibilities that have proven to keep families housed and communities safe.
- Ensure that the Annual Contributions Contract (ACC) between HUD and PHAs is representative of the requirements in the 1937 Housing Act.
- Allow agencies to use Payment Standards up to 120 percent of the Fair Market Rent without requesting a waiver every year or obtaining HUD approval, as rental costs continue to rise rapidly.
- Support housing agencies serving as Performance-Based Contract Administrators.
- Provide training and technical assistance to PHAs so they can make informed decisions regarding tenant admission and continued occupation policies that address local considerations.
- Provide as many mechanisms as possible to allow PHAs and redevelopment agencies to develop new affordable housing units using a variety of funding sources and local strategies.
- Ensure small and medium sized PHAs remain competitive for funding grants that serve their communities.