



March 9, 2015

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

**Re: Docket No. FR 5743-P-01
RIN 2506-AC38 Streamlining Administrative Regulations for Public Housing,
Housing Choice Voucher, Multifamily Housing, and Community Planning and
Development Programs**

On behalf of the members of the National Multifamily Housing Council (NMHC) and the National Apartment Association (NAA), we are writing to provide comment on the proposed rule to streamline administrative regulations for public housing, housing choice voucher, multifamily housing, and community planning and development programs at the Department of Housing and Urban Development (HUD). We appreciate the opportunity to share the views of apartment industry participants on the proposed rule, and applaud HUD's stated goal of aligning requirements across programs and streamlining regulatory requirements for the Department's multifamily and rental assistance programs.

The combined memberships of NMHC and NAA are engaged in all aspects of the apartment industry, including ownership, development, management and finance. NMHC represents the principal officers of the apartment industry's largest and most prominent firms. As a federation of more than 170 state and local affiliates, NAA is comprised of over 67,000 members representing more than 7.6 million apartment homes throughout the United States and Canada.

The findings in HUD's recently released *Worst Case Housing Needs: 2015 Report to Congress* serve as a potent reminder of the considerable demand for affordable housing today. The report also highlighted the importance of every effort to improve programs addressing rental housing needs. Increases in housing costs, a persistently uncertain funding environment in Congress, and chronic underfunding of public housing and voucher assistance have strained existing programs, making public-private partnerships more critical than ever to meeting affordable housing needs. We applaud efforts at HUD to relieve the administrative burden on multifamily housing owners and managers and encourage greater participation in affordable housing programs, and believe this should remain an ongoing focus for the Department.

Start of Assisted Tenancy (§ 982.309)

Property managers and renters have a number of programmatic hurdles to overcome before final lease execution and move-in for assisted units. We believe eligible renters seeking certified accommodations should receive housing as quickly as prudently possible. Creating arbitrary restrictions on move-in dates would represent a new administrative burden, and further delay move-ins for otherwise eligible renters. HUD should discourage this and other policies that unnecessarily delay the move-in process for assisted units.

Biennial Inspections and the Use of Alternate Inspection Methods (§§ 982.405, 983.103)

Delays and inconsistency during the inspection and renewal process remain a significant issue for property owners and managers. The interval required for voucher-assisted renters to fully execute a lease and occupy a unit is unnecessarily prolonged by inspection delays, which places both the renter and the property owner at a disadvantage in the market. We support this proposal to streamline inspections, and encourage HUD to continue identifying alternate inspections substantially meeting HUD standards, including required state and local inspections.

We also encourage HUD to review current public housing authority (PHA) practices at large to identify best practices for expediting inspections, including expanded online interface between PHAs, property inspectors, and property managers to promote transparency and accountability. Because inspection delays are a frequently referenced impediment for private sector participation in HUD's affordable housing programs, achieved efficiencies will benefit current users and encourage future participation.

Housing Quality Standards (HQS) Reinspection Fees (§ 982.405)

With respect to subsequent inspections addressing Housing Quality Standard violations, we would like to make a point of clarification. If the follow up inspection process is conducted beyond the scope of previously identified violations, property owners, families and PHAs could experience a continuous, self-perpetuating cycle of inspections, reinspections and identifying new issues. This scenario is counterproductive to efforts aimed at managing inspection costs and regulatory burden for HUD and program participants. By clarifying that reinspections are focused on previously identified issues and do not trigger the effect of a second full HQR inspection for property owners, HUD can better achieve their stated goal in this regard.

Verification of Social Security Numbers (§ 5.216)

The proposed rule seeks to align requirements for program applicants and program participants regarding social security number verification. We support the proposal, and encourage HUD to further align program requirements that can eliminate unnecessary causes of assistance denial for renters and properties.

Income Certification & Rent Calculation

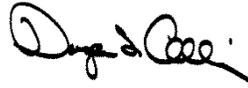
Regarding elements of the proposed rule addressing income certification and rent calculations, we believe a simple standard should be applied to each proposal; does it relieve the administrative burden on multifamily owners and managers while maintaining appropriate tenant protections and overall program quality? Proposals for use of actual past income (§ 5.609), earned income disregard (§§ 5.617, 960.255), and streamlined annual reexamination for families on fixed incomes (§§ 5.657, 960.257, 982.516) all meet this standard, and we encourage HUD to maximize the potential regulatory relief each presents.

On behalf of our two organizations, we thank you for the opportunity to provide comments on the proposed rule.

Sincerely,



Douglas M. Bibby
President
National Multi Housing Council



Douglas S. Culkin, CAE
President
National Apartment Association