

October 13, 2011

The Honorable Judy Biggert
Chair
House Financial Services Subcommittee on Insurance, Housing and Community Opportunity
2129 Rayburn House Office Building
Washington, DC 20515

Dear Madame Chair:

We are in receipt of your recent discussion draft entitled "The Section Eight Savings Act of 2011" (SESA), which is the subject of today's hearing. Our organizations represent owners, management companies, lenders, builders and developers and housing agencies, which have been working with Congress for the last ten years to formulate common sense legislation to streamline the important Housing Choice Voucher Program. We have long-maintained that the Section 8 voucher program is extremely successful, but like many government programs, has started to sag under the weight of too many inefficient and duplicative requirements. The myriad of overlapping and redundant procedures has made the program difficult to administer and has deterred many professional landlords from participating in the program.

We very much appreciate your interest in improving what is a critical tool for housing millions of low income families and elderly persons. We also are pleased that the draft clarifies issues related to the Limited English Proficiency Program (LEP), allows more working families to qualify for vouchers, particularly in rural areas, includes language to ensure that the Fair Market Rents (FMRs) continue to be published annually on October 1 and that prior to final publication, a public comment period is offered, as well as provides an extension of HUD's authority to restructure debt under its Mark to Market program.

However, we are unable to offer our full support for the current discussion draft because the provisions that are most important to streamlining the program have been marginalized in an attempt to condition their application to only housing agencies who agree to participate in a self-sufficiency demonstration program. While our organizations are supportive of ongoing and future efforts to help low income families achieve self-sufficiency, tying the ability to implement efficiencies to a demonstration program is unwarranted as streamlining inspections and income certifications is a benefit to all those involved. Important program changes including streamlined inspections, less frequent certifications for the elderly and disabled and common sense approaches to calculating income and assets should be applied to every voucher holder, housing agency and apartment owner.

We request that the Subcommittee reconsider its approach and restore the important changes to all program participants by removing Section 101 of the bill. In this difficult fiscal climate, it is important to note that these reforms would provide for significant budget savings. We are happy to work with you to identify other incentives and tools to promote expanded self-sufficiency efforts in the voucher program without mitigating the important efficiencies that are central to the continued success of the program.

Sincerely,

Council for Affordable and Rural Housing
Institute for Responsible Housing Preservation
Institute of Real Estate Management
Leading Age (formerly AAHSA)
National Affordable Housing Management Association
National Apartment Association
National Association of Affordable Housing Lenders
National Association of Home Builders
National Association of REALTORS®
National Leased Housing Association
National Multi Housing Council

cc: Luis V. Gutierrez, Ranking Member
House Financial Services Subcommittee on Insurance, Housing and Community Opportunity