



July 29, 2024

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

RE: HOME Investment Partnerships Program: Program Updates and Streamlining [Docket No. FR-6144-P-01]

To Whom It May Concern:

On behalf of the undersigned members of HOME Coalition, we respectfully submit the following comments in response to the proposed rule to provide program updates and streamlining for the HOME Investment Partnerships Program (the HOME program). The HOME Coalition is a collaboration of national and regional organizations representing all types of participants in the HOME program, including government officials, state and local participating jurisdictions (PJs), nonprofit and for-profit developers, Community Housing Development Organizations, owners of affordable housing, and advocates for renters, homeowners, and homebuyers.

First, it is worth noting that those members of the Coalition that have signed this letter represent a diverse set of interests, and not every organization is able to fully support each provision of the proposed rule. Many of our organizations will submit comments of our own, reflecting unique concerns with the proposed rule and suggestions for improvements to it. Nevertheless, as a group, we applaud the overall effort that went into drafting this proposed rule, which if finalized would represent the most significant regulatory update to the HOME program in over a decade. As a whole, if adopted, the changes in the proposed rule would have a material positive impact on the ability of a range of stakeholders to use the HOME program to develop and preserve affordable homes for purchase and rent, and to provide rental assistance to families in need.

Second, we are pleased to find in the proposed rule a number of regulatory recommendations previously submitted by a number of members of the HOME Coalition in a letter dated August 25, 2022. For example, changes to the definition of Community Land Trust (CLT), updates to staffing and organizational requirements for Community Housing Development Organizations (CHDOs), improvements to resale requirements for HOME homebuyer activities, and more flexible policies with respect to rents and utility allowances are all welcome changes in the proposed rule that were among those included in the aforementioned letter. We appreciate both the opportunity to provide those recommendations and your careful consideration of them as you developed the proposed rule.

Third, despite the changes in the proposed rule, we are confident you would agree that there is further room for improvement to the HOME program, subject to changes to the HOME statute itself. The HOME Coalition has worked extensively with interested Members of Congress to develop legislation that would modify the HOME program beyond what was possible with this



proposed rule, and we encourage HUD to continue to work with Congress to develop and eventually pass legislation to reauthorize and further modernize the HOME program.

Finally, if implemented, the changes in this rule (subject to any modifications based on the comments received) will require a significant effort by all involved, including HUD, to educate stakeholders and help ensure a smooth transition to the new regulatory framework. Upon finalizing the proposed rule, we strongly encourage HUD to dedicate adequate technical assistance resources to this effort, and to take advantage of the platform many of our organizations offer to reach a wide audience of interested parties.

Once again, thank you for the opportunity to comment on this proposed rule and for the effort that went into developing it. We look forward to working with you to implement the changes it includes and to continuing to improve the HOME program for the benefit of the low-income renters, buyers, and residents of HOME-assisted housing.

Sincerely,

Community Opportunity Alliance - formerly NACEDA
Council for Affordable and Rural Housing
Council of State Community Development Agencies
Enterprise Community Partners, Inc
Fahe
Habitat for Humanity International
Health Partnership Network
Housing Assistance Council
Housing Partnership Network
Local Initiatives Support Corporation
National Affordable Housing Management Association
National Association of Housing and Redevelopment Organizations
National Association of Regional Councils
National Association for Latino Community Asset Builders
National Community Development Association
National Community Stabilization Trust
National Council of State Housing Agencies
National Housing Conference
National NeighborWorks Association
ROC USA
Stewards of Affordable Housing for the Future