



December 20, 2023

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

Via Electronic Submission

RE: Proposed Rule, Modernizing the Delivery of Housing Counseling Services
Docket No. 88 FR 73298; RIN 2502-AJ70

To Whom It May Concern,

The National Council of State Housing Agencies (NCSHA)¹ appreciates the opportunity to comment on behalf of our state Housing Finance Agency (HFA) members on the Department of Housing and Urban Development's (the Department) Proposed Rule, "Modernizing the Delivery of Housing Counseling Services."

We commend the Department's efforts to align the advances in technology available for housing counseling providers with current client engagement preferences and make permanent parts of the Temporary Partial Waiver of 24 CFR 214.300(a)(3), In-Person Housing Counseling Requirement, which allows housing counseling agencies to utilize alternative methods to conduct housing counseling and education with clients in lieu of meeting in-person.

We support the Department's Proposed Rule, as expanding the methods for delivering vital housing counseling services will improve the reach and efficacy of our members and all housing counseling providers. Permanently authorizing telephonic and virtual counseling methods will especially benefit housing counseling clients living in rural or remote areas, allowing them to connect with services that may have been out of their reach prior to the Temporary Partial Waiver.

¹ NCSHA is a nonprofit, nonpartisan organization. None of NCSHA's activities related to federal legislation or regulation are funded by organizations that are prohibited by law from engaging in lobbying or related activities.

Thank you for this opportunity to provide comments on the Department's Proposed Rule. NCSHA welcomes any further discussion about our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Garth Rieman", with a long horizontal flourish extending to the right.

Garth Rieman

Director of Housing Advocacy and Strategic Initiatives