



November 24, 2020

Mr. John Gibbs
Acting Assistant Secretary
Community Planning and Development
U.S. Department of Housing and Urban Development
451 7th Street SW
Washington, DC 20410

Dear Mr. Gibbs:

The National Council of State Housing Agencies (NCSHA)¹, on behalf of its Housing Finance Agency (HFA) members, urges the U.S. Department of Housing and Urban Development (HUD) to take immediate action to extend the temporary relief provided by the pair of April 10, 2020 memoranda on the availability of waivers and suspensions of HOME Program Requirements and HOME-Assisted Tenant-Based Rental Assistance for Emergency and Short-term Assistance in response to the COVID-19 pandemic.

NCSHA applauds HUD's quick action to issue these memoranda, providing relief from program deadlines and requirements in response to the COVID-19 pandemic. This action was instrumental in allowing HFAs to safely administer the HOME program and continue to serve low-income residents during the extenuating circumstances the pandemic has caused.

Unfortunately, COVID-19 cases are still increasing nationally. The pandemic continues to impact the supply of construction materials, timing of permitting and local approvals, and the availability of construction workers. It also continues to limit the ability of property managers to interact with residents for regular property operations and to restrict the ability of HFAs to complete development approvals and regular compliance monitoring functions. The ongoing pandemic also necessitates the continuation of the flexibility HUD provided for HOME TBRA programs.

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.

Given the continuing importance of safeguarding the health of HOME-assisted residents, property management staff, and state inspectors, we urge HUD to issue immediate guidance extending the relief provided by the pair of April 10, 2020 memoranda for a minimum of 9-months. Depending on how long the crisis lasts, HUD may need to further extend these actions beyond the time period we have requested in this letter.

We appreciate HUD's attention to these critical issues at this busy time and stand ready to assist in any way that we can.

Sincerely,

A handwritten signature in black ink, appearing to read "Garth Rieman". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Garth Rieman
Director of Housing Advocacy and Strategic Initiatives