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NATIONAL LOW INCOME HOUSING COALITION

MEMO TO MEMBERS

The Weekly Newsletter of the National Low Income Housing Coalition

NATIONAL HOUSING TRUST FUND

President's FY14 Budget Request Includes $1 Billion for NHTF; Shows New Estimates for Tax Expenditures

President Barack Obama released his FY14 budget request to Congress on April 10 (see article later in *Memo*). The President's budget request includes $1 billion for HUD's National Housing Trust Fund (NHTF) for the fifth consecutive budget cycle.

The Obama Administration continues to support the NHTF by calling for mandatory funding. The NHTF is intended to be funded on the mandatory side of the budget so as not compete with HUD's discretionary funded housing programs. However, as in past budget requests, there is no specific offset identified to fund the program.

The President's budget also includes new projections on the cost of 169 tax expenditures, including the mortgage interest deduction. In 2013, the MID is projected to cost $93,090 billion. This is less than the projection for 2013 in last year's budget, which was $100,910 billion. This is a less sizable drop in the cost of the mortgage interest deduction than was reported earlier this year by the Joint Committee on Taxation (see *Memo*, 2/1).

However, the five year projection for 2014 to 2018 in this year's budget is $640,180 billion; the 2013 to 2017 projection in last year's budget was $606,420 billion.

The mortgage interest deduction remains the second largest tax expenditure, with exclusion of employer contributions for medical insurance premiums and medical care the most expensive.

To review all tax expenditures, see tables 16-1 to 16-4 at http://www.whitehouse.gov/omb/budget/Supplemental.

H.R. 1213 Gains Co-Sponsors

Two additional Members of the House of Representatives have co-sponsored H.R. 1213, the Common Sense Housing Investment Act of 2013. They are Representatives Barbara Lee (D-CA) and Jan Schakowsky (D-IL). Representative Lee was an original co-sponsor of the bills to establish the National Housing Trust in the 107th and 108th Congress.

H.R. 1213 would modify the mortgage interest deduction and use the revenue raised to fund affordable rental housing, including the NHTF. The bill is sponsored by Representative Keith Ellison (D-MN) and is endorsed by the United for Homes Campaign.

Advocates are urged to ask their Representatives to co-sponsor H.R. 1213. Representative Ellison sent a second "Dear Colleague" letter on Friday, April 12 inviting Members to cosponsor.

For more information, go to www.unitedforhomes.org/legislation.

United for Homes Campaign Launches Website

The United for Homes Campaign now has a website. Located at www.unitedforhomes.org, the site provides information about the campaign, about our proposal to fund the National Housing Trust Fund with revenue generated from modifications to the mortgage interest deduction, and about how to be part of the movement for a better federal housing policy.

The following sections of the United for Homes website will be of interest to readers of *Memo*:

• About the Campaign, which provides information about how United for Homes proposes solving America's affordable housing shortage and connects visitors with the campaign.

• Current Legislation offers information about H.R. 1213, a major milestone in the United for Homes campaign.

• Resources and Multimedia provides materials advocates can use to learn about the issues, build support for the campaign, and educate lawmakers about our proposal.

On April 15, United for Homes will be re-launching its Housing Tax Reform Calculator, which allows users to estimate their income tax based on three scenarios: the current mortgage interest deduction, elimination of the mortgage interest deduction, and the 15% tax credit and $500,000 mortgage cap proposed by the United for Homes campaign. Find the calculator later in the day on April 15 at www.unitedforhomes.org/proposal/calculator.

Visit the website at www.unitedforhomes.org, and contact our Outreach Team at outreach@nlihc.org with questions or suggestions about resources that would be useful to include on the site.

United for Homes to Host Congressional Briefing on Campaign, H.R. 1213

The United for Homes Campaign will host a Congressional staff briefing on April 22.

The briefing will provide staff with an overview of the United for Homes campaign to modernize the mortgage interest deduction, direct savings into the National Housing Trust Fund, and bring a homeowner tax benefit to millions of additional households. The April 22 briefing will also provide an overview of H.R. 1213, introduced by Representative Keith Ellison (D-MN) on March 12 (see *Memo*, 3/15). The bill would make needed reforms to the mortgage interest deduction and direct resulting savings into the National Housing Trust Fund, among other programs. Finally, the latest national polling data on Americans' views on homelessness and how federal housing resources should be used will be described.

The briefing will be in room 121 of the Cannon House office building at 10am. To RSVP for this event, please email policyintern@nlihc.org.

United for Homes Webinar Series Continues with Focus on NHTF Regulations

The United for Homes Campaign will continue its series of webinars on the proposal to fund the National Housing Trust Fund (NHTF) with revenues generated from modifications to the mortgage interest deduction with a focus on the details of the NHTF.

Join Ed Gramlich, Director of Regulatory Affairs for the National Low Income Housing Coalition, for this webinar from the United for Homes campaign on the proposed regulation that govern the operation of the NHTF. Participants will have the opportunity to ask questions at the end of the presentation.

Register for the webinar at http://bit.ly/111OIIS.

Please save the date for our other webinars taking place in April and early May:

• Friday, April 26, 3-4pm ET: Making the Case to Realtors for the NHTF and Housing Tax Reform

• Friday, May 3, 3-4pm ET: Making Twitter an Effective Tool for Spreading the United for Homes Message

FEDERAL BUDGET

President Issues FY14 Budget Request; Includes Many Policy Proposals for Housing

President Barack Obama released his fifth budget request to Congress on April 10, over two months after the statutory deadline passed. The FY14 discretionary request for affordable housing programs administered by HUD and USDA, while insufficient, is the bright spot for some programs in an otherwise gloomy fiscal outlook.

As HUD and USDA discretionary programs experience cuts from sequestration, the budget request from the President that would restore cuts for some programs, partially address funding shortfalls due to flat funding in the FY13 continuing resolution, and resume funding levels not seen since FY11, is a respite from deeper cuts for some programs. For other programs, the President's request is equal to or more than the funding levels of FY11, after two fiscal years of flat or decreased funding. For several programs, the FY14 request would continue a disappointing trend and further cut funds that have decreased over the past several fiscal years.

The President's budget includes numerous policy proposals for HUD, to find cost savings measures that can create resources for housing programs that are not funded sufficiently, and to advance program reforms. While some of these policy provisions have been vetted with Members of Congress and advocates in the past, others are new initiatives and have not yet been evaluated. HUD plans to propose "comprehensive legislation" in the spring of 2013 that will include its policy proposals that are not included in the request itself.

Once again, HUD's guiding principle for the budget is to maintain funding for all existing HUD-subsidized units. In past fiscal years, HUD has made this commitment but not requested sufficient funding to guarantee that its rental programs achieve that goal. While HUD's request for rental programs is strong, it is not yet clear whether the budget request can achieve the goal of maintaining all existing units.

The Administration's request includes funding designated for the Administration's new Promise Zones initiative to create a "ladder of opportunity," a path to the middle class for residents of 20 impoverished communities across the country.

The budget request includes several assumptions that are critical to the overall funding request for HUD programs. The budget assumes that sequestration is reversed in FY14, that receipts from the Federal Housing Administration (FHA) will be applied to HUD programs, and that a significant funding shortfall for the FHA's Mutual Mortgage Insurance (MMI) fund will be largely addressed by policy changes. None of these assumptions are guaranteed.

Tenant-Based Rental Assistance (TBRA). The President's budget request for the Section 8 voucher program is $19.98 billion, including $17.97 billion for voucher renewals. The Administration claims this funding would allow HUD to renew all vouchers in use at the beginning of FY13, which could mitigate the impact of sequestration cuts and avert a loss of vouchers. The FY13 funding level, after sequestration, could result in the loss of 140,000 vouchers, according to the Center on Budget and Policy Priorities. The President also requests $111 million to renew the Section 811 Mainstream Vouchers.

The Administration's estimate of the FY14 TBRA renewal costs assumes that policy changes it requests will reduce costs in the TBRA account and result in a $235 million savings. It also assumes cost savings from collecting excess public housing agency (PHA) reserve funding. HUD proposes that PHAs be allowed to hold one month of reserves, and amounts above that threshold be designated as "excess." These excess reserves would be applied to contract renewals and to provide funding to prevent termination of families served by PHAs that have insufficient funding.

Administrative fees are funded at $1.69 billion in the President's budget request, a level $300 million higher than in FY12 and FY13. HUD has undertaken a study of administrative fees and expects to publish the findings in 2014. Meanwhile, PHAs have expressed to HUD that the FY13 administrative fee funding level was insufficient; several PHAs have reportedly turned over their voucher programs to HUD or declined to receive Veterans Affairs Supportive Housing (VASH) vouchers due to what they call insufficient funding to administer the vouchers.

The FY14 budget would fund 10,000 new VASH vouchers at $75 million. HUD cites this allocation of new VASH vouchers as critical to continuing its commitment to ending veteran homelessness; homelessness for veterans declined by 12% between 2010 and 2011. The TBRA request also includes $150 million for new Tenant Protection Vouchers, double the amount of FY12 and FY13 funding. The Administration anticipates serving 29,500 households with this funding. These vouchers are not new assistance. Rather, they are provided to tenants who lose their existing federally subsidized housing, like residents who are displaced because of public housing revitalization or because their project-based Section 8 owner decides not to renew its subsidy contract.

The President does not request funding for the Family Self-Sufficiency program within the TBRA account, and instead requests this funding in a separate account.

Project-Based Rental Assistance (PBRA). The Administration requests $10.27 billion for the PBRA program, an increase of nearly $1 billion over the FY13 funding level. In FY12, HUD proposed underfunding the PBRA account by providing only partial-year contracts for some of the properties in its portfolio. While HUD originally reported that the FY14 request of $10.27 billion is sufficient to renew all contracts for a full year in FY14, it now reports that between $11.1 and $11.4 billion would be needed to renew all contracts. HUD requests that funds from the Housing Certificate Fund be directed to the PBRA account to supplement the appropriation, continuing the practice of recent years.

The budget request also includes several policy provisions that HUD would use to direct additional funding to the PBRA account. HUD proposes to collect excess reserve funding from property owners to supplement funding for assistance payments. In FY12, HUD collected excess public housing operating reserves from PHAs to supplement an appropriations request that was insufficient to fund public housing operating costs. The budget request does not limit the number of years that HUD would collect PBRA reserve funding from owners.

HUD also proposes creating a demonstration on energy efficient retrofits for HUD-assisted properties called "Pay for Success." HUD would encourage private entities to invest upfront money for retrofits in these HUD-assisted properties and enter into multi-year agreements to repay these investors. Presumably, these retrofits would reduce costs in the portfolio over time.

HUD also proposes creating a "Flexible Portfolio Demonstration" to secure cost savings and preserve HUD-assisted properties. High-performing owners would be granted "regulatory and administrative flexibilities" in exchange for commitments to provide cost savings and to preserve property affordability. It is not yet clear what flexibilities HUD intends to provide owners, what level of savings these provisions would net, or the whether this flexibility would increase preservation of units in the portfolio.

HUD proposes another policy provision focused on preservation of affordable properties in the PBRA portfolio, which would amend policies related to the Low Income Housing Preservation and Resident Homeownership Act (LIHPRHA) to align them with other PBRA properties. This alignment, says HUD, would better "facilitate preservation transactions."

Even with these provisions, HUD may not be able to provide full-year contracts for all of its currently subsidized properties.

Public Housing. HUD proposes to fund the Public Housing Capital Fund at $2 billion, an increase of $125 million above FY13 and FY12 funding, and nearly level with FY11 funding. HUD's estimated capital needs exceeded $26 billion in FY12.

The request includes two set-asides within the Capital Fund, including $20 million for emergency capital needs and $15 million for a Jobs Plus Pilot expected to serve 30,000 public housing residents. HUD also requested funding for a Jobs Plus Pilot in the FY13 budget request to build on the Jobs Plus demonstration, completed in 2006.

The President requests $4.6 billion for the Public Housing Operating Fund, an amount level with FY11 funding and below the FY12 allocation. In FY12, Congress appropriated $3.9 billion for the Operating Fund but required PHAs to contribute funding from their reserves that increased operating funding to approximately $4.7 billion. In FY13, with excess reserves drained, Congress continued only the $3.9 billion base operating funding and added $300 million through an anomaly in the continuing resolution.

HUD includes five policy provisions related to the Operating Fund. HUD would provide full fungibility between the operating and capital funds. This would eliminate the fees that PHAs must currently pay to use operating funds for capital projects. The budget proposal does not include parameters for this flexibility beyond that the agency must be non-troubled. A similar proposal was included in the FY13 budget request.

The HUD request also includes a proposal to phase-in a flat rent floor of 80% of fair market rents (FMRs) for higher income residents and another to allow PHAs to create consortia for administering public housing units. This latter provision would expand the ability of PHAs to collaborate beyond administration of vouchers.

Another proposal, for which no further details are available, would change community service requirements for residents. Still another would create a "utilities conservation pilot" to reduce federal costs through energy efficiency. HUD plans to submit details of these proposals to Congress in authorizing legislation this spring.

HUD also provides funding related to public housing in two additional accounts. The budget request includes $10 million in funding to continue the Rental Assistance Demonstration (RAD) and $400 million for the Choice Neighborhoods Initiative (CNI). The CNI program was funded at $120 million in FY12 and FY13, and at $65 million in the two prior fiscal years. The President is requesting increased funding in part to support the Promise Zones and would dedicate $200 million of CNI funds for this initiative.

Policy Provisions Related to TBRA, PBRA, and Public Housing. In addition to the policy proposals noted above, the President's FY14 request also recommends many other policies be enacted for FY14. Some of these were requested by HUD in previous budgets, some have been included in rental assistance reform legislation in previous sessions of Congress, and a few are new. The request itself includes suggested legislative language for some of the proposals and, for others, says that a broad legislative proposal will be delivered to Congress in the spring of 2013.

The request notes that this forthcoming legislative proposal will "include a substantial expansion of the Moving to Work (MTW) program." The request notes that "key tenant protections will continue to apply and [public housing agencies] will be subject to rigorous reporting and evaluation requirements." While it is not clear that "key tenant protections" exist at MTW sites that would continue to apply, advocates are hopeful that HUD's legislative proposal for MTW expansion mirrors the work of the 2012 stakeholder agreement on MTW expansion.

HUD's legislative package also allows fixed income families to recertify their incomes every three years instead of annually, establishes a voucher renewal funding formula, enables biennial and alternative inspections, makes improvements to the project-basing of vouchers, and streamlines the process for establishing annual Fair Market Rents.

The request notes that HUD will also seek reforms "simplifying and improving the annual [PHA] plan requirement." There are no details on this proposal. HUD's legislative package will also include a proposal to "establish reasonable limits on compensation provided by PHA personnel" after more than a year of media stories about high salaries and generous compensation packages enjoyed by some PHA directors.

HUD also seeks to increase the threshold used to determine deductions for unreimbursed medical expenses from 3% to 10% of family income. For many advocates, this is half of a widely agreed upon proposal, the half that saves resources. The other half of the medical deduction proposal would increase the standard deduction for elderly and disabled households, to protect them from any harmful impacts of increasing the deduction threshold so significantly.

The request also seeks approval to extend the Rental Assistance Demonstration by two years, through 2015, and expand the number of public housing units that could be included in RAD from 60,000 to 150,000.

Additional policy provisions focus on services in housing. HUD proposes to allow flexibility to use funding for supportive services, but does not provide details on the extent of this flexibility. The budget request also makes changes to the Family Self-Sufficiency (FSS) program consistent with the FY13 request. The Administration would move FSS from the TBRA account to a separate account, and would fund FSS services for tenants in HUD's three main rental programs (TBRA, PBRA, and Public Housing). HUD's funding request is $15 million over past funding levels of $60 million, for a total of $75 million to serve current and additional households. The Administration once again includes a provision to allow the sponsor-based housing model to create supportive housing as a tool to end homelessness. In its FY13 budget request, HUD proposed allowing a PHA to sponsor-base up to 5% of its vouchers. HUD plans to introduce a similar legislative proposal with "strengthened tenant protections."

The request also seeks approval for 13 "Performance Partnership Pilots" to improve outcomes for disconnected youth aged 14 to 24 who are homeless, in foster care, involved in the juvenile justice system, or are neither employed nor enrolled in an educational institution.

Homeless Assistance. The Administration requests $2.38 billion for the McKinney-Vento Homeless Assistance Grants, an increase of nearly $350 million over FY13 funding pre-sequestration.

Homeless Assistance is one of the few HUD programs for which Congress provided increased funding through an anomaly in the FY13 continuing resolution. The President requests $346 million for the Emergency Solutions Grant, including $60 million for rapid re-housing activities for high-needs communities. The request includes $2.03 billion for the Continuum of Care program.

HOME Investment Partnerships. The President's budget request includes $950 million for the HOME program, a decrease of $50 million below the FY13 pre-sequestration levels. Congress has continually cut the HOME program since FY10 from a level of $1.83 billion to $1 billion in Fy13. HUD cites the limited budget resources remaining after funding programs serving current tenants as the reason for curtailing the request for new production funding through the HOME program.

HUD estimates that $950 million for the HOME program will fund 15,200 new and rehabilitated rental units, 9,400 households with tenant-based rental assistance, and 24,500 new and rehabilitated homeownership units.

The budget request includes a provision to establish a single qualification threshold of $500,000 and would make participating jurisdictions that fall below the threshold for three out of five years, in ineligible for direct formula funds. HUD also includes a provision to waive the 30-day waiting period to evict a HOME rental unit tenant if he or she "poses an imminent threat" to other tenants, development employees, or the property.

The Administration's budget also includes a set-aside of $10 million for the Self-Help and Assisted Homeownership Opportunity Program (SHOP), eliminating separate funding for the SHOP account and instead relying upon the HOME account to fund these activities.

Community Development Block Grants (CDBG). The request would decrease funding for CDBG formula grants from $2.95 billion to $2.8 billion. The request also seeks several policy proposals to "better target funds based on community need and ensure that communities receive grants large enough to be more effective in advancing the goals of the program." The details of this " better targeting" are not included in the request, which does say that "HUD will seek input from stakeholders over the coming months regarding further program changes that t0 improve the targeting of formula funds, and strengthen accountability and performance" in the CDBG program.

The President's budget request includes $3.14 billion for the Community Development Fund (CDF), a more than $150 million decrease below FY13 pre-sequestration funding, $350 million below FY11, and $1.3 billion below FY10 funding. (This account includes CDBG.) HUD proposes contributing funds from CDF to the President's Promise Zones initiative.

Supportive Housing. The President's request includes $400 million for the Section 202 Housing for the Elderly program, restoring funding to the FY11 funding level, which was more than 50% below FY10 funding level. The FY14 budget request would restore funding for creating new Section 202 units, approximately $20 million according to HUD.

The President proposes funding the Section 811 Housing for Persons with Disabilities program at $126 million in FY14, approximately $40 million below the FY13 pre-sequestration funding level. HUD expects these funds to renew all Project Rental Assistance Contracts (PRACs) and provide $20 million for new units.

The budget request includes $332 million for the Housing Opportunities for Persons With AIDS (HOPWA) program, roughly level funding for the past several fiscal years.

Other HUD Programs. The Administration would fund Native American Housing Block Grants and Native Hawaiian Housing Block Grants at the FY13 pre-sequestration and FY12 levels of $650 million and $13 million, respectively.

The President's request would fund the Fair Housing and Equal Opportunity Program at $71 million, level with the last several fiscal years. The Healthy Homes and Lead Hazard Control program would be funded at $120 million, level with FY13 pre-sequestration and FY12 funding. The Housing Counseling program would be funded at $55 million, a $10 million increase over FY13 pre-sequestration levels but $30 million less than the FY10 funding level.

HUD's Policy Development and Research program would be funded at $50 million, a slight increase over the funding levels of FY10 through FY13.

Rural Rental Housing. The President requests roughly level FY13 pre-sequestration funding for the USDA Rural Housing Service affordable rental programs. The Administration requests $24 million for the Section 514 Farm Labor Housing Program, which was funded at $23 million pre-sequestration in FY13. The request is below the FY11 funding of $26 million and the FY10 funding of $27 million.

The USDA budget proposal includes $14 million for the 516 Farm Labor Program in the FY14 request, a $6 million increase over FY13 pre-sequestration funding, and $4 million above the FY11 and FY10 levels. The Section 515 Rental Housing Direct program would be funded at only $28 million in FY14, a slight $3 million decrease below the FY13 pre-sequestration level, more than $35 million below the FY12 level, and $40 million below FY11 and FY10 funding levels.

The Administration requests a slight increase for the Section 521 Rental Assistance program of $18 million, for a total request of $1.02 billion. RHS claims this funding is sufficient to renew all rental assistance contracts; however, it has not provided data to confirm this assertion.

Low Income Housing Tax Credit. The Department of the Treasury is seeking changes to the Low Income Housing Tax Credit (LIHTC) program as part of its FY14 request to Congress. Among the changes sought is authorization to allow states to convert some private activity bond volume cap into authority to allocate additional LIHTCs. Treasury is also requesting, again, its income averaging proposal. Here, LIHTC owners would have a third option to meet the program's income targeting requirements: at least 40% of the units would have to be occupied by tenants with incomes that average no more than 60% of area median. Today, to qualify for the LIHTC program, owners must comply with one of the two existing income targeting requirements: at least 20% of units must be rent-restricted and occupied by tenants with income at or below 50% of area median; or, at least 40% of units must be rent-restricted and occupied by tenants with income at or below 60% of area median income. Treasury's FY14 request would also add preservation of federally assisted affordable housing as a mandatory selection criterion for LIHTC allocations. State housing agencies must include certain selection criteria in the qualified allocation plans they follow in deciding which applications receive LIHTCs.

Congress will now consider the President's FY14 budget request and continue its FY14 appropriations work for the Transportation, Housing and Urban Development, and Related Agencies and Agriculture, Rural Development, Food and Drug Administration, and Related Agencies appropriations subcommittees.

View NLIHC's budget chart: http://nlihc.org/sites/default/files/FY14_Budget_Chart.pdf

View the HUD budget request: http://portal.hud.gov/hudportal/HUD?src=/fy2014budget

View the USDA budget request: http://www.obpa.usda.gov/budsum/FY14budsum.pdf

For more information on rural housing programs, view the Housing Assistance Council's analysis of the USDA budget: http://www.ruralhome.org/information-and-publications/announcements/647-fy14-rd-budget

Senate Appropriations Committees Consider President's FY14 Budget Request

The Senate Appropriations Subcommittee on Transportation, Housing and Urban Development, and Related Agencies (THUD) held a hearing on the President's FY14 HUD budget request to Congress on April 11, the day after the request's release. HUD Secretary Shaun Donovan was the sole witness.

The Secretary reviewed the principles of HUD's budget: assisting the housing market recovery, protecting current vulnerable residents, offering ladders of opportunity, and implementing program reforms.

Secretary Donovan said that it is of particular importance to HUD to protect the 5.4 million families HUD serves directly. These households, said the Secretary, have an average annual income of $12,000.

The Secretary said that HUD's contribution to the President's plan to create "ladders of opportunity" will be dedicating funding to the Promise Zones initiative. HUD will contribute funding from the Choice Neighborhoods Initiative, the Community Development Fund, and the newly renamed Office of Economic Resilience (formerly the Office of Sustainable Communities) for the Promise Zones initiative.

Secretary Donovan also described the reforms HUD is proposing, including program changes to the Section 8 program, streamlining efforts, expanding the Rental Assistance Demonstration, and piloting innovative strategies.

The Secretary testified that HUD anticipates $14.5 billion in receipts from the Federal Housing Administration (FHA) in FY14 that will offset HUD's budget request. HUD is also requesting $940 million for the FHA's Mutual Mortgage Insurance (MMI) fund to mitigate losses.

Secretary Donovan discussed the successes that HUD has had in recent years, including the progress that it has made on reducing veteran homelessness. Secretary Donovan emphasized that "sequestration threatens to thwart" HUD's successes. The Secretary said that there will be no way to build on this success unless sequestration is reversed.

Ranking Member Susan Collins (R-ME) said that she is pleased with the progress the Administration is making on reducing veteran homelessness through the HUD-Veterans Affairs Supportive Housing (VASH) program. Senator Collins encouraged HUD to focus on these programs that are effective.

Subcommittee Chair Patty Murray (D-WA) asked the Secretary to describe the potential impacts of sequestration. Secretary Donovan said that if sequestration is not replaced, more than 100,000 families will not receive a voucher, and more than 700 public housing agencies (PHAs) will be forced to terminate families from the voucher program, even if the PHAs stop leasing now. Secretary Donovan also expects that sequestration would result in more PHAs turning back their entire voucher programs. In the first quarter of the year, HUD has seen 13 PHAs turn back their voucher programs and other PHAs turn back VASH vouchers.

The Secretary said that sequestration will also result in a loss of jobs. The cuts to the Community Development Block Grant would result in 20,000 jobs lost. For HUD's entire budget, 50,000 jobs would be lost, said the Secretary.

Chair Murray questioned the Secretary on the funding request for the MMI fund. Secretary Donovan described the actions HUD has taken to protect the MMI fund including implementing five different premium increases that amount to $14.5 billion in FHA receipts. The Administration has applied these receipts to offset HUD program expenses in its FY14 budget. The Secretary said that he thinks HUD should now focus on addressing troubled loans rather than further premium increases. Secretary Donovan said that the Administration is requesting that Congress make policy changes to support the MMI fund rather than go through the regulation process that could take 18 months, preventing HUD from addressing these changes in a timely manner.

Chair Murray questioned Secretary Donovan on HUD's steps to improve oversight, streamline reporting requirements, and update regulations to prevent cases of misuse of funds and unmet safety needs. Secretary Donovan stated that HUD has focused on both enforcement and correction. This approach has led to the number of troubled PHAs decreasing from 175 at the beginning of the Obama Administration to 52 currently. Secretary Donovan said that HUD, as a result of this effort, has a seen a 10% reduction in near-troubled agencies. Secretary Donovan further emphasized that HUD has a responsibility for oversight, but these entities have boards of directors and executives that also have a responsibility for oversight locally. Secretary Donovan said HUD will work to ensure that these individuals are held accountable.

Chair Murray also asked a question about new initiatives in HUD's budget request that aim to address the housing and service needs of communities. Chair Murray asked how the Choice Neighborhoods Initiative (CNI) would encourage partnerships and leverage new money. Secretary Donovan emphasized that CNI and the next iteration of the Neighborhood Stabilization Program are not new programs, but are all tested approaches that will be coordinated better through Promise Zones. Secretary Donovan also said that CNI leverages money to meet community needs by attracting private capital and has already leveraged eight times the amount of federal spending devoted to it.

Ranking Member Collins questioned Secretary Donovan on the Administration's policy choice to base its FY14 budget request on pre-sequestration funding levels. Chair Murray said that this approach is confusing for the appropriators especially around the reporting of FHA receipts. Senator Roy Blunt (R-MO) also questioned the Secretary on the Administration's choice to use pre-sequestration funding levels in its budget request.

View all hearing materials, including a webcast, at http://1.usa.gov/15aZnrO.

Senate Committee on Budget Holds Hearing on President's FY14 Proposal

The Senate Committee on the Budget held a hearing on the President's FY14 budget on April 11, where the sole witness was Jeffrey Zients, the Acting Director and Deputy Director for Management for the Office of Management and Budget. In her opening statement, Committee Chair Patty Murray (D-WA) described the President's budget as a compromise offer that maintains a commitment to jobs and economic growth. "One of the most important ways that both the Senate budget and the President's proposal puts the economy first is by replacing sequestration in a fair and responsible way," Chair Murray said. Chair Murray offered her appreciation of the proposal's balanced approach to deficit reduction, including a responsible mix of spending cuts and new revenue.

Ranking Member Jeff Sessions (R-AL) began his opening statement by asserting that the President's budget is not a balanced budget because spending does not equal revenues, and further stated that the proposal increases spending and taxes. Senator Sessions said that total debt will continue to climb and that the request does not include any real reforms for Social Security and Medicare. The proposal "chooses to grow government at the expense of the economy," and "sequestration was hoped to be avoided, but the cuts in that sequestration were not to be avoided," Ranking Member Sessions said.

Acting Director Zients began his testimony by stating that the President's budget builds on deficit reduction to date and shows the President's willingness to compromise. The President's budget "demonstrates that we can make critical investments to strengthen the middle class, create jobs, and grow the economy," according to Mr. Zients' testimony. Mr. Zients presented the proposal within a framework of balanced deficit reduction and jobs investments. Mr. Zients emphasized that the proposal includes more than $2 in spending cuts for every $1 in revenue and this represents more than enough deficit reduction to replace the damaging cuts required by sequestration.

Senator Sheldon Whitehouse (D-RI) asked what the impacts of spending cuts would be on the economy and how to best protect the economy. Ranking Member Sessions asked about the impact on the economy by high levels of gross debt. In both cases, Mr. Zients responded by stating replacing sequestration would be the best action to protect economic growth.

View the hearing's webcast and related materials at http://1.usa.gov/10VXjjb.

MORE CONGRESS

Senate Panel Holds Hearing on Indian Housing Needs

The Senate Select Committee on Indian Affairs held a hearing, "Identifying Barriers to Indian Housing Development and Finding Solutions," on April 10.

Committee Chair Maria Cantwell (D-WA) opened the hearing by describing how Native Americans disproportionally experience homelessness, representing 8% of the country's homeless population, even though they only represent 1% of the total U.S population. Senator Brian Schatz (D-HI) described how native Hawaiians also disproportionately experience homelessness, representing as high as 59% of residents in programs that serve families and individuals experiencing homelessness in Hawaii.

Many of the witnesses discussed the importance of reauthorizing the Native American Housing Assistance and Self-Determination Act (NAHASDA) and of providing adequate funding to truly address the severe housing conditions on reservations. NAHASDA is due to be reauthorized this year.

Witness Russell Sossamon of the Choctaw Nation Housing Authority urged the Committee to reauthorize NAHASDA by September 30, and to retain and strengthen provisions that allow for a tribally driven negotiated rulemaking process. Witness Paul Iron Cloud, Chief Executive Officer of the Oglala Sioux (Lakota) Housing at the Pine Ridge Reservation in South Dakota, said in his testimony, "NAHASDA funding levels limit us to building on average no more than 30 to 40 units a year, yet we currently need 4,000 new units and 1,000 homes repaired."

Senators and witnesses also discussed ways to better assess housing needs on reservations so as to better allocate federal resources. Senate Committee on Housing, Banking, and Urban Affairs Chair Tim Johnson (D-SD) asked Mr. Iron Cloud how the Dakota Housing Needs Assessment Pilot Project, being conducted by five tribal housing programs, will help improve housing on the Pine Ridge Reservation. Mr. Iron Cloud said entities running the pilot plan to report to Congress, HUD, and the Office and Management and Budget this summer. Mr. Iron Cloud said that if successful, the pilot could "change how housing need is determined on reservations and result in better allocation of federal tribal housing funds."

Chair Cantwell asked witness Roger Boyd of the Office of Native American Programs at HUD why Congress does not have an accurate assessment of housing needs in Indian Country. Mr. Boyd responded that while his office has conducted housing needs assessments, one outstanding problem is a very low response rate, a problem that occurred the last time such an assessment was conducted in 1996.

Mr. Iron Cloud also asked in his testimony for Congress to fully provide for NAHASDA's self-determination commitments to tribal governments. Mr. Iron Cloud wrote in his testimony that the NAHASDA statute dictates that the block grant program has "to function based on self-determination and tribal self-governance." To fulfill the commitments of the NAHASDA statute, Mr. Iron Cloud asked that tribal governments be allowed to decide whether to waive the "Brooke Rule," which requires that residents of assisted housing pay no more than 30% of their income for rent. Mr. Iron Cloud said that the Brooke rule "costs tribal governments an enormous amount of money to administer, it diverts tenant service representatives from performing important management and tenant counseling services, and it creates an unhealthy and adversarial relationship in Indian country that often poisons individual tenant and tribal housing entity relations."

Chair Cantwell asked if and how the Low Income Housing Tax Credit (LIHTC) is being used on tribal lands. Witness Annette Bryan of the Puyallup Nation Housing Authority said that her tribe found it prohibitively expensive to use LIHTC. Ms. Bryan said that tax credits are complex, and that tribes cannot use them to fund housing that requires residents to pay no more than 30% of their income on rents. Ms. Bryan said because unemployment is so high on reservations, tribes are required to pay an unsustainable amount to make up the remainder of costs for households with zero income. Mr. Iron Cloud later said that unemployment on the Pine Ridge Reservation is approximately 80% but that they are considering using the LIHTC to produce more housing because the need for affordable housing is so great. Ms. Cantwell said that the committee will work to determine how LIHTC and similar programs can better work in Indian Country, and be leveraged with private funds.

Mr. Iron Cloud closed his remarks by describing the "Trail of Hope" caravan organized by the Oglala Sioux (Lakota) Housing and the Oglala Sioux Tribe Partnership for Housing. The Trail of Hope will bring a house to Washington, D.C. the week of April 15. The house, built in 1961, was the first federally assisted housing unit built on the Pine Ridge Reservation. Mr. Iron Cloud invited Senator Johnson and the other Senators to visit the demonstration to see firsthand the dire housing conditions in Indian Country. The house is expected to be placed in Union Square, on 3rd Street NW just west of the U.S. Capitol building, on April 17.

Both the Oglala Sioux (Lakota) Housing and the Oglala Sioux Tribe Partnership for Housing are members of NLIHC and Emma "Pinky" Clifford, the Executive Director of the OST Partnership for Housing is a member of the NLIHC Board of Directors. Follow the "Trail of Hope" caravan in their Facebook account https://www.facebook.com/TrailofHopeforIndianHousing.

An archived hearing webcast and all witness testimony are available at http://1.usa.gov/YvErsH.

Senate to Hold Hearing on FHFA Oversight

The Senate Committee on Banking, Housing and Urban will hold an April 18 hearing on "Oversight of Federal Housing Finance Agency: Evaluating the Federal Housing Finance Agency as Regulator and Conservator." Scheduled witnesses are Edward DeMarco, acting director, FHFA, and Steve Linick, inspector general, FHFA. The hearing will be in room 538 of the Dirksen Senate office building.

HUD

Appeals Court Rules Westchester County Violated Consent Decree

The Court of Appeals for the Second Circuit held that Westchester County, New York violated one of the terms of a consent decree from August 2009 regarding the county's failure to affirmatively further fair housing choice (see *Memo*, 3/29). The county appealed a May 2012 judgment by the U.S. District Court for the Southern District of New York, which found that Westchester violated its duty to promote source-of-income legislation. In general, source-of-income legislation prohibits discriminating against someone based upon type of income, such as a Housing Choice Voucher, Social Security benefit, child support, or alimony.

The three-judge Court of Appeals concluded that "no affirmative steps had been taken to promote [source-of-income] legislation" since the previous county executive sent a letter to the county Board of Supervisors in October 2009 encouraging that body to enact legislation already under consideration. That county executive also sent identical letters to five community organizations that were already supportive of the legislation, an act the Court of Appeals characterized as "preaching to the choir." On June 25, 2010, a new county executive vetoed the source-of-income legislation passed by the Board of Supervisors. Since that time, no other actions were taken to promote source-of-income legislation, causing the Court of Appeals to "hold that the County breached its duty to promote under the consent decree."

The Anti-Discrimination Center (ADC), which initiated legal proceedings in 2006 based on the False Claims Act, welcomed this latest decision. However, ADC stressed that the primary issue has been and remains the exclusionary zoning practices of municipalities in the county and the county's ongoing refusal to challenge those municipalities (see *Memo*, 7/27/12). This element of the consent decree was not at issue in the appeal made by the county.

ADC also asserts that the county is not fully complying with another component of the consent decree, the obligation to develop 630 affordable homes in areas with few racial or ethnic minorities between 2010 and 2016. According to ADC, more than 147 homes have been counted toward that obligation but do not meet the terms of the consent decree, such as a development in a Census block which is already 50% Latino. The consent decree has a benchmark goal of approximately 200 homes the end of 2012.

ADC continues to assert that HUD and the Department of Justice are failing to enforce the consent decree by not taking legal action to hold Westchester in contempt. In a recent report, the National Fair Housing Alliance (NFHA) also complains that "HUD has not held Westchester in contempt for violating the consent decree and court orders…. HUD must take permanent, non-negotiable action against Westchester County" (see article elsewhere in *Memo*). A previous report from the Lawyers' Committee for Civil Rights Under Law, the Policy & Research Action Council, and NFHA asserted that HUD has "never moved to hold the County in formal contempt for any of its violations of the court order," and criticized HUD for accepting housing developments that do not affirmatively further fair housing as meeting the terms of the court settlement (see *Memo*, 3/8).

The Court of Appeals decision is at http://nlihc.org/sites/default/files/Court_Appeals_Second_Circuit_4-5-13.pdf.

FROM THE FIELD

New Jersey Advocates Urge HUD to Improve State's Post-Sandy Disaster Action Plan

On March 29, the New Jersey Department of Community Affairs (NJDCA) submitted its Disaster Recovery Action Plan, which details how the state plans to use $1.83 billion, the first installment of federal funding to begin Super Storm Sandy-related rebuilding efforts. Advocates are dismayed that the plan does not include suggestions they made during the public comment period. They are urging HUD to instruct NJDCA to amend its plan to include provisions for sustainable and fair rebuilding.

The Housing and Community Development Network of New Jersey, an NLIHC state coalition partner, recently joined with New Jersey Future and the Fair Share Housing Center in warning HUD Secretary Shaun Donovan that the plan provides more assistance to homeowners than renters, by a four to one margin, when Sandy impacted the two almost equally. In a letter sent April 4, they also indicated that the plan would promote rebuilding communities without real consideration for rising sea levels and changing weather conditions. More than 80 civil rights, community development, housing, labor, religious, special needs and smart growth organizations signed the letter to Secretary Donovan, who chairs the Hurricane Sandy Rebuilding Tax Force.

Commenting on the draft plan, advocates asserted that it severely underestimated the disaster's impact on renters, particularly lower income, African-American and Latino residents, and used an incorrect estimate to justify disproportionately allocating a greater percentage of funds to homeowners. The state's analysis of affected families only considered the aggregate number of damage reports from the Federal Emergency Management Agency (FEMA); it did not account for the fact that many owners are fully covered by insurance and it did not differentiate needs by income level or geography.

The draft plan proposed programs to assist 26,000 homeowners, but only 5,000 renters. According to Enterprise Community Partners, an NLIHC member, 43% of New Jersey households registered for post-Sandy FEMA assistance were renters, while 80% of the households impacted the most and considered most vulnerable (those earning $30,000 or less annually) were renters and likely African-American or Latino. Advocates called for a greater percentage of funds to go to rental housing with long-term affordability on new construction projects. HUD requires grantees to pay attention to neighborhoods with the greatest damage to homes and provide demographic analysis to identify special needs populations; advocates called on NJDCA to provide this analysis in its final plan.

In their comments, advocates thanked state officials for introducing the Sandy Special Needs Housing Fund (SSNHF). This program will fund supportive housing for those with special needs, including those experiencing homelessness, and place emphasis on rental housing for this population. Advocates requested that the fund be implemented using the guidelines for the state Special Needs Housing Trust Fund, which leveraged resources and created 1,501 permanent supportive housing units; it was eliminated in 2011 due to lack of revenue. Advocates further advised NJDCA to use recovery funds to build a pipeline of supportive housing projects, with the majority of state Supportive Services Program funds directed toward SSNHF-developed units. They underscored that the funds should be used to supplement, not replace, those already committed to resolve Olmstead litigation.

The Network is working with the state's Congressional delegation to urge HUD to instruct NJDCDA to revise its plan to incorporate these suggestions. It also plans significant media work focusing on the plan's limited ability to address the needs of all those affected.

"The NJDCA Action Plan undercounts renters impacted by Sandy; as a result, many people will not have an opportunity to move back to their communities," said Staci Berger, the Network's executive director. "Relying solely on FEMA inspections, which counted damage for renters in a much less comprehensive way than for owners, skews the plan. Many of us raised the imbalance in the draft plan, but it was not addressed. We need Secretary Donovan and our federal leaders to ensure an equal shot for everyone to rebuild."

To view advocates' comments to NJDCA's draft action plan: http://library.constantcontact.com/download/get/file/1101062454704-320/DCA+Action+Plan+Letter+FINAL.pdf

To view NJDCA's plan: http://www.nj.gov/dca/announcements/pdf/CDBG-DisasterRecoveryActionPlan.pdf

To view the Network's letter to Secretary Donovan: http://www.hcdnnj.org/assets/documents/sandy%20action%20plan%20letter%20to%20donovan.pdf

For more information, contact Arnold Cohen at acohen@hcdnnj.org.

RESOURCES

U.S. Homelessness Declined in 2012, in Part Due to Federal Programs Now at Risk

The National Alliance to End Homelessness (NAEH) released its third annual report on homelessness rates and related indicators earlier this week. *The State of Homelessness in America 2013* finds that the U.S. homeless population decreased slightly (0.4%) between 2011 and 2012, with the largest reductions among the chronically homeless (6.8%) and veterans (7.2%). However, many indicators associated with the risk of homelessness, including high fair market rents and poverty rates, rose in the previous year. NAEH suggests that overall homelessness levels decreased in part because of targeted federal assistance programs, some of which are at risk of losing funding.

According to 2012 point-in-time estimates, 633,782 people experienced homelessness on a single night in January, meaning that 20 out of every 10,000 people are homeless. Of those, 15.8% were chronically homeless individuals, and 37.8% were people in families. Though there was no change in the number of families experiencing homelessness, the average homeless family size increased, translating into a 1.4% increase in the number of people in families experiencing homelessness, the only subpopulation increase between 2011 and 2012. Further, although the nation saw an overall decrease in the homeless population, 29 states reported increases, ranging from 0.3% in Washington to 74.7% in Wyoming.

As homelessness is dependent on previous circumstances, the authors also examined economic and housing factors from 2010-2011 and five year trends of factors that are often associated with a higher risk of homelessness. The report finds a shrinking supply of affordable housing nationally alongside economic indicators that would suggest greater risk of homelessness, such as a decrease of median household income and per capita social spending on public assistance, and a rise in poverty despite the decreasing unemployment rate from 2010 to 2011. The number of renters nationwide spending more than half of their income on housing costs increased by 5.5%. Increases varied greatly among states that experienced increases, from 0.2% in Nebraska to 58.4% in Maine. The fair market rent also increased by 1.5% between 2010 and 2011.

Living doubled-up with friends or family is the previous living situation most often cited by individuals and families entering homelessness. From 2010 to 2011, 38 states reported an increase in doubled-up households, with 10 states experiencing at least a 25% percent increase. Poor adults accessing safety net benefits increased by 11.5% nationally and 43 states reported the same or a higher number. The report states that, while accessing these benefits is not a sign of homelessness, the indicator reveals how many households are in need of additional resources for essential needs.

Though trends vary widely by state, the report emphasizes how targeted federal, state and local investment led to decreases in chronic and veteran homelessness. NAEH continues to advocate for increased opportunities for community-based homelessness prevention. The authors affirm that rapid re-housing has made a difference by decreasing the amount of time households spend homeless, and increasing the capacity of communities to serve the homeless.

Access the report at http://bit.ly/111cPJb.

National Fair Housing Alliance Issues 2013 Fair Housing Trends Report

As the nation marks the 45th anniversary of the passage of the Fair Housing Act, the National Fair Housing Alliance (NFHA) calls for that venerable law to be modernized. The current set of protected classes under the Fair Housing Act are limited to race, color, national origin, religion, sex, disability, and family status. In *Modernizing the Fair Housing Act for the 21st Century: Fair Housing Trends Report for 2013*, NFHA asserts that Fair Housing Act protections must now also prohibit discrimination based on sexual orientation, gender identity, source of income, and marital status. According to NFHA, "For some time, state and local governments have been at the forefront of protecting additional populations that are vulnerable to housing discrimination. It is time for our federal legislators to commit to doing the same."

Lesbian, gay, bisexual, and transgender (LGBT) people often encounter upfront hostility from landlords, real estate agents, and lenders when looking for housing. Housing discrimination is especially harsh for transgender people who are often forced into homelessness due to outright discrimination.

The report cites a 2011 survey of 6,450 transgender people conducted by the National Gay and Lesbian Task Force and the National Center for Transgender Equality, which found that 19% were denied a home or apartment, 19% experienced homelessness, and 11% had been evicted. Of those who attempted to access homeless shelters, nearly one third were turned away.

Each year NFHA collects data from both nonprofit fair housing organizations and government entities. In 2012 there were 28,519 complaints of housing discrimination, compared to 27,092 the previous year. Sixty-nine percent of the discrimination complaints were investigated by private organizations. Complaint data reflect only reported incidents of housing discrimination; NFHA conservatively estimates that there are four million violations every year. Many people do not report housing discrimination because they do not know where to go, they believe nothing will be done, or they fear retaliation.

Disability complaints remain the greatest percentage of all complaints for the past several years. Many apartment owners make direct comments refusing to make a "reasonable accommodation," such as paying to create a handicapped parking spot with a curb cut for someone with a wheel chair. Many owners also refuse to make a "reasonable modification" paid for by a resident, such as making a structural change inside an apartment that can be reversed when the tenant leaves.

Modernizing the Fair Housing Act for the 21st Century: 2013 Fair Housing Trends Report is available at http://bit.ly/YvGddi (PDF).

NLIHC NEWS

2013 Advocates' Guide Available for Purchase

The *2013 Advocates' Guide to Housing and Community Development Policy*, the latest edition of this National Low Income Housing Coalition classic, is now available for purchase. It is a compendium of all federal housing, community development, and related programs and issues with both current and historical information. Whether you are a new employee at a housing agency, a student in an urban planning program, or a seasoned affordable housing advocate looking for a refresher on key programs, this book will give you the overview of housing programs and advocacy tools you need to be a leader in the affordable housing movement.

To order a copy of the *2013 Advocates' Guide to Housing and Community Development Policy,* please contact Christina Sin at christina@nlihc.org or 202-662-1530 x224. NLIHC members receive a discounted rate, and special bulk rates are also available.

NLIHC's *Advocates' Guide* is made possible by the generosity of PNC.

NLIHC Seeking Applicants for Executive Assistant

NLIHC is seeking applicants for the position of Executive Assistant, who supports the President and CEO by providing a full range of administrative services, including logistical support for the Board of Directors and assistance to the Vice President of Operations.

Qualifications include highly developed organizational, administrative, interpersonal, oral and written communication skills; proficiency in all Microsoft Office software applications and experience in use of database applications; and a commitment to social justice. A bachelor's degree is required; non-profit experience is preferred. An equal opportunity, affirmative action employer, NLIHC offers a competitive salary and benefits package. The position is based in Washington, DC.

Interested candidates should send their cover letter, resume, writing sample, and salary requirements to: Bill Shields, Vice President for Operations, National Low Income Housing Coalition, 727 15th Street NW, 6th Floor, Washington, D.C. 20005, or to bill@nlihc.org.

MEMO TO MEMBERS
April 12, 2013
Volume 18, Issue No. 16

FACT OF THE WEEK

Ten Highest and Lowest Rates of Homelessness by State, 2012

District of Columbia	112.5
Hawaii	45.4
Oregon	40.9
Nevada	36.4
New York	35.7
National Rate of Homelessness	20.3
North Dakota	10.1
Indiana	9.6
Iowa	9.6
Kansas	9.3
Mississippi	8.1

Note: Rates are per 10,000 in the general population

Source: National Alliance to End Homelessness. (2013). *State of Homelessness in America.* Table B.1. Overall Homelessness by State. Retrieved from: http://www.endhomelessness.org/library/entry/the-state-of-homelessness-2013.

NLIHC STAFF

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ABOUT NLIHC

The National Low Income Housing Coalition is dedicated solely to achieving equitable federal policy that assures affordable, accessible, and healthy homes for the people with the lowest incomes in the United States.

Established in 1974 by Cushing N. Dolbeare, NLIHC educates, organizes, and advocates to ensure decent, affordable housing within healthy neighborhoods for everyone.

TELL YOUR FRIENDS!

NLIHC membership is the best way to stay informed about affordable housing issues, keep in touch with advocates around the country, and support NLIHC's work.

NLIHC membership information is available at www.nlihc.org/join. You can also e-mail us at outreach@nlihc.org or call 202-662-1530 to request membership materials to distribute at meetings and conferences.

Follow @NLIHC on Twitter!

Become a fan of NLIHC on Facebook!

Check out NLIHC's blog, *On the Home Front*, at www.nlihc.wordpress.com!