

Volume 30, Issue 18 May 27, 2025

#### HUD

• HUD PIH Updates Guidance for Reasonable Accommodation Exception Payment Standards

#### **Budget and Appropriations**

- House Republicans Pass Reconciliation Bill Including LIHTC Expansion and Significant Changes to Vital Anti-Poverty Programs
- Take Action to Protect Federal Housing and Homelessness Funding in FY26 with NLIHC's Advocacy Toolkit

#### **Homelessness and Housing First**

• Recap of 5/21 Advancing Homelessness Solutions Webinar

#### **IDEAS**

• NLIHC Releases Spring Issue of Tenant Talk

#### **Native Housing**

• HUD Seeking Nominations for Tribal Intergovernmental Advisory Committee (TIAC)

#### **State and Local Innovation**

• Montgomery County, Maryland Passes New Law Strengthening Local Habitability Standards

#### **Disaster Housing Recovery**

- NLIHC and Members of the Disaster Housing Recovery Coalition Submit Comments to FEMA Review Council
- NLIHC Hosts Disaster Housing Recovery Research Consortium Meeting

#### **Opportunity Starts at Home**

• New Issue Brief from Justice in Aging on the Importance of Federal Rental Assistance for Older Adults

#### Research

• HUD Rental Assistance Programs May Reduce Overcrowded Living Conditions for Children

# Fact of the Week

• Gap Widens Between Single- and Multifamily Rent Prices

#### From the Field

• NLIHC Welcomes Ramon Kodi Suzuki López as Field Intern

#### **NLIHC Careers**

• NLIHC Seeks Senior Vice President, Public Policy

# NLIHC News

- NLIHC Welcomes Kristen Stehling as Fund Development Director
- NLIHC in the News May 19
- Where to Find Us May 26

# HUD

# HUD PIH Updates Guidance for Reasonable Accommodation Exception Payment Standards

# TAG: Housing Choice Vouchers

*Keywords: Reasonable accommodation, RA, payment standards, exception payment standards, EPS, guidance, Notice, PIH, HUD, disabilities* 

HUD's Office of Public and Indian Housing (PIH) issued <u>Notice PIH 2025-12</u> on May 13, revising guidance regarding requests for "reasonable accommodation" exception payment standards (RA EPS) by people with disabilities applying for or already participating in the Housing Choice Voucher (HCV) Program. Notably, Notice PIH 2025-12 removes a previous requirement that a household receiving an RA EPS pay 40% of their adjusted income toward the gross rent (contract rent plus utilities) when they are initially approved to receive an HCV with an RA EPS. Notice 2025-12 supersedes PIH Notice 2013-18.

Further, the Notice clarifies that the RA EPS remains in effect as long as a household has a disability-related need for the features of an approved unit. Households that have been living in a unit with an RA EPS can request a higher RA EPS due to rent increases or changes in their household income if the rent is no longer affordable to them, typically when their share of the rent would be greater than 40% of their adjusted monthly income. In this case, a PHA would need to request HUD approval; HUD approval is also needed if the higher RA EPS is greater than 120% of the Fair Market Rent (FMR) or Small Area FMR (SAFMR).

# Background

Public housing agencies (PHAs) have an obligation to make HCV programs readily accessible to and useable by people with disabilities. Section 504 of the "Rehabilitation Act of 1973," the "Americans with Disabilities Act" (ADA), and the "Fair Housing Act" require PHAs to provide reasonable accommodations to rules, policies, practices, procedures, and services to afford an

applicant or participant with a disability an equal opportunity to use and enjoy their housing unit, the common areas of a housing development, housing-related services and amenities, maintenance and administrative operations, and programs and activities conducted or sponsored by a PHA.

The amount of the HCV subsidy for a household is capped at a "payment standard" set by a PHA, which must be between 90% and 110% of the FMR or SAFMR, whichever a PHA is using. FMRs are based on rents for a modest apartment in an entire metropolitan area (which can contain many counties). HUD sets FMRs annually. <u>Small Area FMRs</u> reflect rents for U.S. Postal ZIP Codes. The intent of SAFMRs is to provide voucher payment standards that are more in line with neighborhood-scale rental markets, resulting in relatively higher subsidies in neighborhoods with higher rents and greater opportunities, and lower subsidies in neighborhoods with lower rents and concentrations of voucher holders.

When a household needs a unit with specific features or a unit for another disability-related reason (which may include location) to accommodate a household member with a disability, and the household is unable to find a unit with those features or that otherwise meet the disability-related need within the payment standard, the household may request an exception to the payment standard as a reasonable accommodation. PHAs are required to evaluate each request on a case-by-case basis to ensure an RA EPS may be necessary. Households are not required to follow any formal procedures or use specific words or terminology when requesting reasonable accommodation. An explanation about the RA EPS must be included in the voucher briefing packet provided when a household is selected to participate in the HCV program.

# The Notice Describes the RA Review Process

PHAs review and approve RA EPS requests up to 120% of the FMR or SAFMR, whichever the PHA is using, without HUD approval. RA EPS requests greater than 120% of the FMR/SAFMR must be reviewed and approved, first by the HUD field office, and subsequently by HUD Headquarters.

If a household disability is obvious, readily apparent, or already known, a PHA cannot request additional information about someone's disability or disability-related needs. In some situations, someone with a disability might have already provided information verifying their disability with tenant-provided documents (e.g., Supplemental Security Income, SSI, award letter; Social Security Disability Insurance, SSDI, award letter; monthly statements; or Veteran Disability Benefits letter). If the disability-related need for a particular unit is not obvious, readily apparent, or known, a PHA may only request information necessary to evaluate the disability-related need for a unit. A person may provide documentation from a doctor or other medical professional, a peer support group, a non-medical service agency, or a qualified third party. A PHA should not ask someone about the severity of any disability.

The Notice offers some example circumstances that may qualify for an RA EPS, including but not limited to:

- Units with accessibility features such as accessible bathrooms or larger doorways
- Units on the ground level or with access to elevators if the person uses a wheelchair or mobility devices
- Units with features that benefit people with hearing or visual impairments

- Units close to medical providers or other services or supports
- Units with accessible parking on the premises
- Units close to essential services or daily life activities
- Units close to public transit or to other accessible transportation
- Units in a location with sidewalks for individuals who use wheelchairs or mobility devices

Read PIH Notice 2025-12 at https://tinyurl.com/4cdcuf2p

General information about the HCV program is on page 4-1 of NLIHC's 2024 Advocates' Guide.

# **Budget and Appropriations**

# House Republicans Pass Reconciliation Bill Including LIHTC Expansion and Significant Changes to Vital Anti-Poverty Programs

#### TAG: Other Housing Policy Issues

#### Keywords: Reconciliation, LIHTC, Medicaid, SNAP

House Republicans passed a massive reconciliation bill by a vote of 215-214 in the early morning of May 21, with all Democrats and Representatives Warren Davidson (R-OH) and Thomas Massie (R-KY) voting against, and Rep. Andrew Garbarino (R-NY) voting "present." The legislation will next be considered in the Senate, with the goal of passing a final bill into law before the July 4 recess.

If enacted, the bill would make the tax cuts originally authorized in the 2017 "Tax Cuts and Jobs Act" permanent, exempt tipped wages from taxation, and provide significant funding increases for defense and immigration enforcement, among other provisions. In addition, the bill includes key pieces of the "Affordable Housing Credit Improvement Act" (AHCIA; <u>H.R. 2725/S. 1515</u>), including a 12.5% allocation increase for three years, lowering the bond-financing threshold from 50% to 25%, and designating rural and Tribal areas as "Difficult to Develop Areas," making developments in these areas eligible for a basis boost (see *Memo*, <u>5/19</u>).

To offset the cost of these provisions, the bill would make several harmful changes to Medicaid, the Supplemental Nutrition Assistance Program (SNAP), and other vital anti-poverty programs. The bill would cut at least \$716 billion from Medicaid through policy and programmatic changes that would result in an estimated <u>15 million people</u> losing healthcare coverage by 2034. The bill also proposes <u>cutting SNAP by about 30%</u>, around \$300 billion, which would reduce future food assistance for all 40 million SNAP participants. Added work requirements for the program would also result in an estimated three million people losing assistance and a drop in assistance for the roughly two million children whose caregivers cannot meet the stricter work requirements.

Further, the bill would increase barriers to immigrant families accessing assistance, including a proposal to exclude nearly 4.5 million children – the majority of whom are U.S. citizens – from receiving the <u>Child Tax Credit</u>. While undocumented immigrants are already ineligible for

federal assistance programs, the bill would kick lawfully present immigrants off the assistance programs they can currently access, prohibiting them from receiving SNAP, Medicare, healthcare coverage under the "Affordable Care Act," and Federal Student Aid.

While housing assistance is not a target for cuts, the anti-poverty programs being considered for cuts play a crucial role in economic stability for people and families with low incomes, helping them put food on the table and receive needed medical care. The financial assistance these programs provide also promotes housing stability: by helping families afford the cost of food and other necessities, more money is left over at the end of the month to ensure rent is paid. States can also use Medicaid to cover <u>health-related social needs</u>, including housing.

The threats to Medicaid, which serves over 72 million low-income people around the country, and SNAP, which serves over 42 million people, have triggered widespread outcry from advocates around the country. Public opposition to the proposed cuts to Medicaid and SNAP puts pressure on moderate and swing-district Republicans to express concerns about the bill to leadership; as negotiations continue, it will be crucial for advocates – especially those in Republican districts and states – to keep up the pressure on their members of Congress to vote against any reconciliation bill that would cut vital safety net programs.

The National Alliance to End Homelessness launched a <u>Take Action page</u> for advocates to quickly and easily contact their elected officials and urge them not to support cuts to Medicaid. Take action here: <u>tinyurl.com/3c2ntnnw</u>.

Learn more about how you can advocate for continued SNAP funding at the Food, Research, and Action Center's (FRAC) website: <u>tinyurl.com/2mzr5pb3</u>.

# Take Action to Protect Federal Housing and Homelessness Funding in FY26 with NLIHC's Advocacy Toolkit

TAG: Budget and Appropriations

Keywords: Appropriations, FY26

Advocates can use NLIHC's fiscal year (FY) 2026 toolkit, <u>"Opposing Cuts to Federal</u> <u>Investments in Affordable Housing</u>," to call on Congress to protect and expand affordable housing and homelessness resources in the upcoming federal budget.

Communities around the country rely on funding from HUD and the U.S. Department of Agriculture (USDA) to support critical affordable housing, homelessness services, and community development projects. Despite the importance of these resources, HUD and USDA programs have been dramatically underfunded for decades. At current funding levels, only one out of every four households that qualifies for rental assistance receives assistance, leaving millions of renters struggling to afford housing and a record number of people experiencing homelessness.

On May 2, President Donald Trump released a partial budget request for FY26 that indicated the Administration would pursue a historic 44% cut to HUD funding, including a proposed 43% cut

to rental assistance compared to the previous year. The proposal would also cut funding for and restructure the Homelessness Assistance Grants (HAG) program and fully eliminate several other programs that provide vital aid to low-income communities and individuals facing housing insecurity (see NLIHC's full analysis <u>here</u>). The president's full budget request is expected to be released in the coming weeks.

The president's budget request – partial or not – represents the wishes and priorities of the president and his Administration. Only Congress has the authority to determine final funding levels for federal programs. House and Senate appropriators are beginning to draft their own FY26 proposals.

# Take action – tell Congress to reject the Trump Administration's proposal and to invest in the affordable housing, homelessness, and community development resources our communities need!

The <u>"Opposing Cuts to Federal Investments in Affordable Housing</u>" toolkit offers information, resources, and strategies for advocates to take action to protect federal investments in affordable housing, homelessness assistance, and community development. NLIHC's FY26 priorities include:

- Full funding to renew all existing Housing Choice Voucher (HCV) contracts and funding to renew 60,000 Emergency Housing Vouchers (EHVs).
- Increased funding for public housing operations and public housing capital needs.
- \$4.922 billion for HUD's Homeless Assistance Grants (HAG) program.
- \$20 million for the Eviction Protection Grant Program (EPGP).
- At least \$1.3 billion for HUD's Tribal housing programs and \$150 million for competitive funds targeted to tribes with the greatest needs.

The toolkit also links to the "<u>Reject Housing Cuts and EHV Funding Cliff: Action Toolkit</u>," developed in partnership with the Center on Budget and Policy Priorities, National Alliance to End Homelessness, and the National Housing Law Project. This toolkit provides additional resources and data highlighting the urgent need for additional FY26 funding for HCV and EHV renewals.

National, state, local, Tribal, and territorial organizations can also <u>join over 2,300</u> <u>organizations</u> on CHCDF's national letter urging Congress to provide the highest possible funding for affordable housing, homelessness assistance, and community development resources in FY26.

# **Homelessness and Housing First**

# Recap of 5/21 Advancing Homelessness Solutions Webinar

TAG: Homelessness and Housing First

Keywords: Homelessness, Housing First, webinar

NLIHC, the National Alliance to End Homelessness (The Alliance), and the Center on Budget and Policy Priorities (CBPP) hosted a joint webinar series on May 21 titled, "<u>Building a Federal</u> <u>Budget that Advances Homelessness Solutions.</u>" The session was part of the ongoing *Advancing Homelessness Solutions* webinar series.

Slides from the webinar are available here.

Kim Johnson, Senior Director of Policy at NLIHC, presented an overview of President Trump's fiscal year (FY) 2026 partial budget request. The proposed budget would reduce HUD's funding by 44% from the previous year – including a 43% cut to rental assistance programs – and entirely redesign federal rental and homelessness assistance programs. Steve Berg, Chief Policy Officer at The Alliance, elaborated on the Administration's proposed cuts to homelessness assistance funding, proposed to be slashed by 14%, and "consolidation" of HUD's Continuum of Care (CoC) and Housing Opportunities for Persons with AIDS (HOPWA) programs under the Emergency Solutions Grant (ESG) program. This change would fund grant-based homelessness support programs at significantly lower levels.

Sonya Acosta, Senior Policy Analyst at CBPP, outlined the president's proposal to cut funding and combine four rental assistance programs – Housing Choice Vouchers (HCVs), Housing for Persons with Disabilities (Section 811), Housing for the Elderly (Section 202), and Project-Based Rental Assistance (PBRA) – into one State Rental Assistance Block Grant program. She emphasized that block granting often leads to future funding reductions and transfers the burden of cost management to state governments.

A recording of the call can be viewed <u>here</u>.

#### Some of the resources discussed on the webinar were:

- Take action
  - o <u>NLIHC's Action Portal</u>
  - o The Alliance's Action Portal and Summary of Funding Asks
- Overview of the president's partial budget request
  - o <u>The Alliance's Analysis</u>
  - o <u>NLIHC's Analysis</u>
- Emergency Housing Vouchers
  - o EHV and Voucher Funding Toolkit
  - o EHV Dashboard
  - o <u>Urban Institute EHV Case Studies</u>
- Homeless Assistance Grants Dear Colleague letters
  - o <u>House</u>
  - o Senate
- Stay engaged.
  - o Sign up for Alliance Email Updates
  - o Sign up for Alliance Advocacy Alerts
  - o Sign up for NLIHC Action Alerts

Last year, more than 14,000 people participated in our monthly Homelessness and Housing First <u>webinar series</u>. Given the tremendous interest among stakeholders and the worsening homelessness and the affordable housing crises, we expanded the series to focus on solutions to homelessness. On the webinars, we share more about proven strategies to successfully end homelessness, best practices for state and local advocacy, and actions advocates can take to advance homelessness solutions. Homelessness demands urgent action from all levels of government. We know what works to end homelessness: providing individuals with stable, accessible, affordable housing and voluntary supportive services. We hope you will join us in building the political will and congressional support necessary to end homelessness!

# **IDEAS**

# NLIHC Releases Spring Issue of Tenant Talk

# TAG: IDEAS

Keywords: Tenant Talk, spring, May, disaster recovery, housing, climate crisis

NLIHC released the Spring 2025 edition of *Tenant Talk Tenant Talk – Disaster Recovery and Housing: Navigating the Climate Crisis. Tenant Talk* is a semi-annual publication that engages tenants in housing advocacy and highlights organizing tactics and victories in communities across the country. In this edition, readers explore the intersection of climate change, disaster recovery, and housing justice. You can sign up to receive a free copy by mail <u>here</u>. The form will close by May 29, 2025, or whenever the quota of *Tenant Talk* copies is met, whichever comes first. Additional copies of *Tenant Talk* will also be available for purchase. Contact <u>ideas@nlihc.org</u> for more information.

This issue features articles that examine the disproportionate impacts of climate disasters on marginalized communities, highlighting tenant-led climate advocacy efforts, and spotlighting ongoing recovery struggles in places like Hawaii and Puerto Rico. From in-depth interviews with policy experts and tenant leaders, to a look at the documentary *Razing Liberty Square*, the publication will dive into the human side of climate displacement and resilience. Readers will also find updates on federal housing policy, including recent HUD staff cuts, as well as the latest research on climate-related housing challenges. Throughout, this issue centers tenant voices and underscores the urgent need for equitable, affordable, and climate-resilient housing and recovery efforts.

A <u>digital version</u> of the latest *Tenant Talk* is now available to all NLIHC members and partners, as well as to the general public, for reading or downloading. Digital copies will be available in Spanish soon.

If you would like to receive a printed version of *Tenant Talk* for free through the mail, you can fill out this <u>quick form</u>. Please note, you are limited to one order of either one or five copies. Copies are available on a first-come, first-served basis. If you have registered to receive a physical copy of a past edition, we ask that you please register through the form again. The form

will close May 29, 2025, or whenever the stock of physical copies is exhausted. Please feel free to share the form with your network and any others who might be interested.

All editions of *Tenant Talk* can be accessed <u>here</u>.

# **Native Housing**

# HUD Seeking Nominations for Tribal Intergovernmental Advisory Committee (TIAC)

# TAG: Native Housing

#### Keywords: Tribal intergovernmental advisory committee, TIAC, Tribal, Native

HUD is <u>seeking nominations</u> for the Tribal Intergovernmental Advisory Committee (TIAC). The committee plays a pivotal role in bringing Tribal leadership perspectives directly to HUD leadership on housing policy and other intergovernmental issues that impact Indian Country. The current list of TIAC members can be found <u>here</u> and submissions can be submitted <u>here</u>.

HUD established the TIAC in 2022 to further enhance consultation and collaboration with Tribal governments. It has provided critical support to HUD as it formulates policies that directly impact Tribes/Tribally Designated Housing Entities (TDHEs). The 15 Tribal members serve two-year terms, and at the end of 2025, seven of the representatives' terms will end.

TIAC has served as a key platform for strengthening consultation and collaboration between HUD and Tribal governments. The committee advises HUD on its programs and regulations, particularly those that affect Tribes and TDHEs, and helps shape American Indian and Alaska Native (AIAN) housing priorities. TIAC is comprised of HUD representatives and Tribal delegates from across the country. Members include the HUD Secretary or their designee, the Assistant Secretaries for the Office of Public and Indian Housing (PIH); Office of Policy, Development, and Research (PD&R); Office of Fair Housing and Equal Opportunity (FHEO); Office of Field Policy Management (FPM); Office of Housing (FHA); Government National Mortgage Association (Ginnie Mae); the Office of Community Planning and Development (CPD); and fifteen Tribal delegates.

Interested persons must submit nominations electronically through the <u>Federal eRulemaking</u> <u>Portal</u>.

# **State and Local Innovation**

# Montgomery County, Maryland Passes New Law Strengthening Local Habitability Standards

TAG: State and Local Innovation, From the Field

Keywords: Eviction, code enforcement, habitability, tenant protections

In April, lawmakers in Montgomery County, Maryland passed a new renters' rights bill that would strengthen the enforcement of habitability standards and allow renters to take legal action against landlords and property owners who fail to uphold a minimum warranty of habitability. Passed through "<u>Council Bill 6-25</u>," the "Consumer Protection for Renters Act" would provide renter households with recourse to fight back against substandard housing conditions, with the new law outlining civil penalties for housing code violations and violations of the county's landlord-tenant laws. Sponsored by Councilmember Kristin Mink (District 5), the new law would have a positive impact for renters in the private rental market, as <u>35% of housing units in Montgomery County are renter-occupied</u>. Moreover, with the passage of "Council Bill 6-25," <u>Montgomery County joins 10 states and 12 localities that have taken measures to ensure the proactive upkeep of each jurisdiction's rental housing stock</u>, with the locality even strengthening a 2024 state law passed in Maryland through "<u>House Bill 1117</u>" that addresses dangerous living conditions for renters.

The passage of Montgomery County's new habitability law would ameliorate housing conditions for renters experiencing unsafe living conditions. Unsafe housing conditions can result in living conditions that become unfit for habitation, with such conditions typically manifesting as a lack of heating or air conditioning, rodent or pest infestations, the presence of mold, or faulty housing structures that can pose physical safety risks or result in bodily harm. To do this, "Council Bill 6-25" will extend existing consumer protection laws to cover the rental housing market, in turn closing a loophole that has historically excluded rental housing from coverage. The law would allow the county's Office of Consumer Protection to investigate substandard living conditions – or "defective tenancies" – even allowing tenants to make complaints to the department when such conditions arise.

By ensuring that rental housing units adhere to and uphold the same protections for consumers as businesses do, landlords and property owners are prohibited from engaging in "deceptive trade practices" – or failing to meet the basic obligations outlined within a tenant's lease agreement. Such deception could present as a failure to provide or repair essential building services such as working elevators or trash pickup, inoperable appliances or amenities, or even requiring tenants to pay excessive rental fees, commonly known as "junk fees," despite the presence of chronic housing code violations.

Embedded in the law are stronger enforcement mechanisms to ensure that substandard habitability conditions do not go unchecked or unfixed. For any landlord or property owner who violates the guidelines established by "Council Bill 6-25," the resulting violation could be distributed as a civil penalty, with each violation not to exceed more than \$1,000. For housing code violations that repeatedly go unfixed, the county will have the ability to bring a legal course of action against a landlord to seek damages and restitution for failing to uphold habitable housing conditions. Under the law specifically, the <u>Office of the County Attorney</u> will be responsible for bringing suit against a landlord or property owner in violation of the law, with the law establishing that the county can even seek the recovery of attorney fees if they prevail in the lawsuit.

Effective enforcement of the county's habitability laws have historically been difficult for governing agencies in the county. According to the county's <u>Department of Housing and</u> <u>Community Affairs</u>, during the 2024 fiscal year the agency <u>attempted</u> to collect more than \$1.5 million in unpaid District Court fines stemming from legal action taken against landlords, yet only \$100,375 was collected. In Montgomery County, the District Court has historically been

overburdened by the number of cases tried, resulting not only in delays upwards of six months to when cases are heard in court, but also in judges reducing the fines levied against landlords and property owners. Under Montgomery County's new law, however, cases will now be heard by the Office of the County Attorney in circuit court, allowing for habitual code violators to respond to repeated exhibitions of code noncompliance.

With Montgomery County's new habitability law in place, tenant households will feel positive reverberations. According to the Department of Housing and Community Affairs which publishes the number of multi-family rental properties with unresolved code violations annually, there were 90 properties in 2024 that had unresolved repairs, more than double the amount from 2023 when 39 instances were reported.

The county's new law will also have positive implications for renter households of color who comprise the greatest share of renter-occupied units in the county. <u>According to the 2023</u> <u>American Community Survey</u>, renter households of color, including Asian, Black, Native American, and Latinx households, comprise more than 60% of renter occupied units in the county, with white renters accounting for 37% of the occupied housing stock.

When renters have the necessary safeguards to speak out against habitability concerns and assert their rights in a legal setting, it not only ensures that any habitability concerns will be resolved, but it also minimizes the threat of retaliation against tenants who may be wrongfully evicted without cause for bringing awareness to a habitability concern. As evidenced by NLIHC's *"Strengthening Renters' Rights: A Primer on Renter Protections"* toolkit on code enforcement protections, the presence of such laws can remove the burden from tenants to report issues with their units, instead placing the onus on the agency tasked with overseeing law enforcement to ensure the proactive upkeep of a unit. As such, these laws can rectify any health and safety concerns without a tenant fearing displacement from their home, in turn ensuring housing stability over the short- and long-term.

Montgomery County's "Council Bill 6-25" was widely supported by tenant advocates. According to the press release issued when the bill passed, the community and nonprofit organizations listed in support of the bill were Action in Montgomery (AIM), Service Workers International Union (SEIU) Local 500, United Food and Commercial Workers Local 1994 -MCGEO, the Islamic Society of the Washington Area (ISWA), the Muslim Community Center (MCC) of Silver Spring, CASA, the Enclave (Silver Spring) Tenants Association, Jews United for Justice (JUFJ), and Everyday Canvassing.

On June 11, NLIHC's State and Local Innovation campaign will host a webinar to discuss code enforcement protections and the advocacy efforts that led to local wins across the country in upholding tenant rights. The webinar will feature presentations from advocates in both Colorado and New Orleans, Louisiana to talk about efforts to enact Colorado's "<u>Senate Bill 24-094</u>" and New Orleans' "<u>Healthy Homes</u>" ordinance. Registration for the webinar can be found <u>here</u>.

More information on Montgomery County's habitability law can be found here.

# **Disaster Housing Recovery**

# NLIHC and Members of the Disaster Housing Recovery Coalition Submit Comments to FEMA Review Council

#### TAG: Disaster Recovery

#### Keywords: Disaster Recovery, FEMA

NLIHC and over 30 members of its Disaster Housing Recovery Coalition (DHRC) submitted collaborative comments in response to a <u>request for information</u> published in the *Federal Register* seeking feedback on experiences with FEMA during recent disasters. The request was issued by the FEMA Review Council created by President Trump on January 24 via an Executive Order (EO). The Council was tasked with reviewing all aspects of FEMA operations and was formed following public statements from members of the Trump Administration suggesting that the agency should be dismantled.

Led by NLIHC, the DHRC consists of more than 900 national, state, and local organizations, many of which work directly with disaster-impacted communities and have firsthand experience navigating FEMA's recovery process. The DHRC works to ensure that federal disaster recovery efforts are both equitable and effective, reaching the lowest-income and most marginalized survivors.

In their comments, DHRC members provided recommendations to increase access to disaster recovery resources, improve coordination among federal agencies, better protect displaced households, and ensure clear and accessible emergency communications. The comments also emphasized the importance of FEMA's role in safeguarding communities from future disasters.

While calling for significant reform, commenters were united in affirming that FEMA remains vital to disaster response. They stressed that critiques of FEMA's processes should not be misconstrued as support for eliminating the agency. As one coalition member noted, "Our comments below should not be misconstrued to support dismantling FEMA or any aspect of its mission. FEMA provides crucial assistance and funding to states and communities before, during, and after disasters" read a portion of NLIHC's submission. "Dismantling FEMA... will not make communities safer, and it most certainly will not increase access to disaster recovery resources. It will, however, unnecessarily, risk the lives of disaster survivors most in need."

Read the full version of NLIHC's comments here.

View a running archive of comments submitted by partners here.

# NLIHC Hosts Disaster Housing Recovery Research Consortium Meeting

#### TAG: Disaster Recovery

#### Keywords: Disaster recovery, FEMA

As part of its ongoing Disaster Housing Recovery, Research, and Resilience (DHR) initiative, NLIHC hosted a group of over 40 researchers and community-based organizations to participate

in an in-person convening of the Disaster Housing Recovery Research Consortium. The Consortium, which has convened periodically for the past seven years, works to increase access to disaster assistance data to better understand and improve disaster response and recovery, facilitate connections between disaster-impacted communities and the research community, and share research ideas and best practices to improve the quality of disaster recovery-related research.

Attendees hailed from every region of the country, from Puerto Rico to Hawaii. Attendees heard from disaster recovery and advocacy specialists at NLIHC who covered the latest in the country's disaster recovery systems and reform efforts. A representative from the National Science Foundation discussed grants available from that organization, and attendees shared the latest research and advocacy developments from their own areas of the country.

In a segment new to consortium meetings, NLIHC staff helped organize visits to Capitol Hill, helping participants schedule meetings with their representatives and senators to inform them of the state of disaster response and recovery and reiterate the importance of disaster recovery research. Participants held over 20 meetings with congressional offices, which helped clarify what these offices were hearing about disaster response and recovery capabilities on the ground. NLIHC thanks Consortium participants and looks forward to hosting again in the fall.

# **Opportunity Starts at Home**

# New Issue Brief from Justice in Aging on the Importance of Federal Rental Assistance for Older Adults

#### TAG: Opportunity Starts at Home

#### Keywords: Opportunity Starts at Home, multi-sectors

Justice in Aging, an Opportunity Starts at Home (OSAH) Campaign Roundtable member group, released an issue brief this month highlighting the importance of federal rental assistance for older adults. The number of older adults being served by the Department of Housing and Urban Development (HUD) is increasing, with households headed by adults over age 62 making up about 42% of the households that receive assistance from HUD's major federal rental assistance programs. At the same time, older adults are increasingly experiencing homelessness, with adults over age 55 making up 20% of all people experiencing homelessness in 2024. Many older adults experiencing homelessness are losing their housing for the first time after age 50, and the key drivers for homelessness among this population are housing costs and the gap between income and rental costs. The issue brief highlights how expansion of federal rental assistance, in addition to supporting housing stability, would benefit older adult health and economic security while also supporting the ability to age in place.

Older adults make up a disproportionate amount of extremely low-income renters and often rely on social security and or/ supplemental security income (SSI) to meet their basic needs, including rental costs. Receiving housing assistance reduces financial burden and allows older adults to better meet other basic needs, like food and healthcare. The brief emphasizes that due to insufficient funding for federal rental assistance, only one in three older adults who qualifies for subsidized housing receives it, and those who qualify must face closed or multi-year long waitlists, sometimes waiting more than a decade to receive assistance. Older adults waiting for subsidized housing are at an increased risk of experiencing homelessness, which accelerates aging and raises mortality risk. Older adults experiencing homelessness frequently develop geriatric conditions typical of people 20 years older, and the median life expectancy for older adults experiencing homelessness is 65.

Federal rental assistance not only supports older adults with housing but also improves their economic security and supports aging in place. Aside from social security, federal rental assistance lifts more older adults out of poverty than other government programs. Federal rental assistance also prevents forced moves and evictions of older adults that lead to homelessness or institutionalization, as a lack of affordable housing contributes to unnecessary nursing home placement. To ensure that low-income older adults can stay housed and age with dignity in an environment that matches their needs, policy makers must protect and expand federal rental assistance.

Read the issue brief here.

# Research

# HUD Rental Assistance Programs May Reduce Overcrowded Living Conditions for Children

#### TAG: Housing Assistance

# Keywords: Public Housing, Housing Choice Vouchers, children, health outcomes, crowding, doubled up

A recent article published in the *Journal of Urban Health*, titled "<u>Do Rental Assistance Programs</u> <u>Relieve Overcrowding for Children?</u>" examined how rental assistance programs impact overcrowding in households with children. As of 2022, nearly 4.5 million U.S. households were considered overcrowded – defined as having more than one person per room (PPR). Low-income renters are particularly vulnerable to overcrowding, often because they are forced to rent units too small for their household size or because they must "double up" with others to afford a place to live. The authors found that children in households receiving rental assistance were significantly less likely to live in overcrowded conditions relative to households that received rental assistance two years later, indicating that expanding access to rental assistance through increased funding could help alleviate crowding for families with children.

Researchers analyzed data from children under 18 whose households participated in the National Health and Nutrition Examination Survey (NHANES) between 1999 and 2018. About two-thirds (2,560) of the children lived in households receiving rent subsidies from the U.S. Department of Housing and Urban Development (HUD) at the time of their participation in NHANES, while the remainder (1,167 children) lived in households that were not subsidized at the time but received HUD assistance within two years. The authors considered the latter group a proxy for households waitlisted for HUD assistance and referred to them as a "pseudo waitlist" group. The

NHANES data were combined with HUD administrative records documenting the type of assistance households received – i.e., public housing, Housing Choice Vouchers (HCV), and multifamily housing – and when they entered or exited the program.

The study found significant differences in occupancy conditions for children living in HUDassisted households relative to pseudo-waitlisted households. "Waitlisted" households experienced significantly higher rates of crowding, with 25.7% having one or more residents per room compared to just 17.5% of assisted households. Regression models that controlled for factors like age, race, and family-income-to-poverty-ratio were used to predict the effect of rental assistance on occupancy conditions and suggested that children receiving HUD assistance were 8% less likely to live in a crowded household than those not receiving assistance. The authors found no significant differences in household size or the total number of rooms in the household between those receiving assistance and those "waitlisted."

The authors also examined differences by program type, considering "waitlisted" households under the program through which they would later receive assistance. Among households receiving HCV, they found an 8% reduction in the group experiencing crowding relative to "waitlisted" households, which they attributed to a significant increase in the total number of rooms in the housing unit without a change in household size. Among households in public housing, there was a reduction in the group experiencing crowding of 13% relative to "waitlisted" households. In contrast to HCV households, this may be a result of a significant decrease in household sizes; the authors explain that families in doubled-up living situations may have moved into their own public housing unit, decreasing household size. No significant differences were found between households in multifamily housing and "waitlisted" households.

Overall, the study indicates that rental assistance may reduce crowding in households with children. Specifically, the findings suggest that HCVs may help families obtain rental units with more living space, while public housing may allow families to leave doubled-up living situations. The authors recommend that more research be conducted into why multifamily housing assistance does not reduce crowding, as this has important implications for HUD's Rental Assistance Demonstration (RAD) program, which aids the conversion of public housing to multifamily housing. The authors conclude that increasing funding and capacity of HUD's rental assistance programs could meaningfully reduce crowding and the associated negative impacts to children's health and well-being.

# Read the full report at: <u>https://bit.ly/4kufadG</u>.

# Fact of the Week

# Gap Widens Between Single- and Multifamily Rent Prices

# TAG: Fact of the Week

Keywords: Rent prices, multifamily rentals, single-family rentals



**Source:** Urban Institute. (2025) Growing Divergence in Single- and Multifamily Rental Prices. Based on analysis of the Zillow Observed Rent Index. Available at: <u>https://bit.ly/3ZnAKbl</u>.

# From the Field

# NLIHC Welcomes Ramon Kodi Suzuki López as Field Intern

# TAG: From the Field

#### Keywords: NLIHC, field intern

NLIHC is pleased to welcome Ramón Kodi Suzuki López as a field intern for summer 2025. Ramón is pursuing a bachelor's degree in economics and race, colonialism, and diaspora studies at Tufts University, with a concentration in socially just public policy. He describes himself as "unapologetically loud" about his own lived experiences with poverty and homelessness while growing up in unincorporated East Los Angeles.

Before joining NLIHC, Ramón held several internship roles focused on diversity, equity, inclusion, and justice (DEIJ), contributing to projects in the fields of law, health, immigration, and academic research. While working on a demographic data analysis project for the City of Somerville Office of Housing Stability, he recognized how deeply his own lived experience informs his creativity and approach to addressing systemic challenges. During his time with NLIHC, Ramón hopes to gain a deeper understanding of the policy advocacy process and explore how his skills and personal insights can contribute to efforts within the housing, homelessness, and anti-poverty spheres.

# **NLIHC Careers**

# NLIHC Seeks Senior Vice President, Public Policy

The Senior Vice President of Public Policy reports to the President and Chief Executive Officer of the National Low Income Housing Coalition (NLIHC) and oversees the policy team. Direct reports include NLIHC's Senior Director of Policy and Director of Disaster Recovery. The salary range for this position is contingent upon experience and is from \$148,000 - \$185,000. This position requires physical time in the office, and the candidate must be in the metropolitan Washington D.C. area or be able to commute to our office located in D.C. for a hybrid work schedule.

# **Responsibilities/Duties**

# Team Management & Development

- Supervise and provide leadership to diverse, high-performing teams, including policy and disaster housing recovery, resilience, and research.
- Foster a collaborative, high-energy work environment where team members are encouraged to innovate, take initiative, and thrive.
- Provide regular coaching, mentorship, and professional development opportunities to ensure team members grow and succeed.
- Promote a culture of inclusion, transparency, and accountability among teams.

# Cross-functional Collaboration

- Facilitate collaboration within the organization to ensure alignment with NLIHC's broader objectives.
- Leverage the full range of organizational resources— including policy expertise, compelling research, media relations, field engagement, cross-sector partners, and more—to build effective, integrated advocacy efforts to advance housing justice.
- Collaborate with external partners, coalitions, and stakeholders to strengthen campaigns and amplify national messages.

# Policy Development, Analysis, Monitoring, and Influencing

- Oversee and provide strategic direction and support for policy team efforts to advocate, educate and influence federal policymakers in Congress and the Administration to support affordable housing and homelessness investments, programs, and policies and an equitable federal disaster response and recovery.
- Establish the vision and strategy for NLIHC's federal policy efforts, aligning them with our strategic plan and mission to serve the nation's lowest-income households.
- Develop and maintain relationships with legislative and executive branch offices, and with other organizations and coalitions.
- Track, analyze, influence, and report on policy developments.

# Board & Senior Leadership Collaboration

- Provide updates and strategic insights to the board of directors.
- Participate actively in senior leadership meetings, contributing to organizational strategy, decision-making, and resource allocation.
- Advise on emerging opportunities, potential risks, and innovative approaches to strengthen NLIHC's influence and reach.

# Organizational Support

- Participate in staff meetings, retreats, trainings, and NLIHC events; convene and lead staff meetings in the absence of the President/CEO, as needed.
- Coordinate planning and implementation of aspects of annual conference.
- Represent NLIHC on boards, committees, task forces and work groups, and with media. Engage in public speaking on NLIHC priorities at meetings and conferences, and on Capitol Hill.
- Other duties as assigned.

# Qualifications

- 10-15 years of experience in policy, legislative, and/or advocacy campaigns, with a demonstrated record of success at the national level.
- Ability to identify and strategize around shifting political climates to advance housing justice legislatively and administratively.
- Strong understanding of the political, legal, and cultural landscape affecting the lowestincome and most marginalized households and their housing needs.
- Proven ability to lead and motivate diverse teams, with experience managing crossfunctional and geographically dispersed staff.
- Excellent strategic thinking, problem-solving, and decision-making abilities, with a knack for balancing long-term vision with short-term operational needs.
- Experience working in or alongside advocacy, grassroots, and coalition-building organizations.
- Unwavering commitment to racial and social equity in all aspects of work, and a demonstrated ability to develop strategies and tactics to create equitable and inclusive outcomes.
- Highly adaptable, initiative-taking, and strategic, with the ability to thrive in fast-paced, high-pressure environments.
- Persuasive communication skills, both written and verbal, with the ability to engage diverse stakeholders, including the media, policymakers, funders, and supporters.

An equal opportunity, affirmative action employer, NLIHC offers a competitive salary and benefits package. Interested candidates should submit a resume, cover letter with salary requirement, and a writing sample to Jamaal Gilani, Director of People and Culture, via email at jgilani@nlihc.org.

# **NLIHC News**

# NLIHC Welcomes Kristen Stehling as Fund Development Director

NLIHC is excited to welcome Kristen Stehling as our new Fund Development Director. In this role, Kristen will lead the fund development team and work closely with the Vice President of External Affairs to support the Coalition's development and fundraising endeavors.

Kristen has over 15 years of experience in nonprofit development and fundraising for social justice advocacy. Most recently, she served as Director of Institutional Giving for the National Latina Institute for Reproductive Justice. Prior, she managed foundation and corporate giving at Asian Americans Advancing Justice (AAJC).

Kristen graduated from The George Washington University's Elliot School of International Affairs with dual BA degrees in History and Asian Studies.

# NLIHC in the News for the Week of May 19

The following are some of the news stories to which NLIHC contributed during the week of May 19:

- "Landlord-tenant commission can't agree on just cause evictions. There is consensus on other reforms," *Yahoo News*, May 19, at: https://tr.ee/Ti7vAO
- "Roundup: FEMA preparedness questioned, and reduced energy prices staunch construction cost rises," *Homes.com*, May 20, at: https://tr.ee/b9ish0
- "Willis Takes Helm of NLIHC," *Affordable Housing Finance*, May 21, at: https://tr.ee/QOdXCx

# Where to Find Us – May 27

- <u>COHHIO</u> Tenant Protections Roundtable virtual, June 9 (Lindsay Duvall)
- <u>Kingston Housing Task Force</u> Community Housing Series Kingston, NY, June 24 (Lindsay Duvall)

# **NLIHC Staff**

Sarah Abdelhadi, Senior Research Analyst Saatvik Amravathi, State and Local Innovation Intern Andrew Aurand, Senior Vice President for Research, x245 Sidney Betancourt, Project Manager, Inclusive Community Engagement, x200 Kayla Blackwell, Housing Policy Analyst, x231 Victoria Bourret, Project Manager, State and Local Innovation, x244 Jen Butler, Vice President, External Affairs, x239 Alayna Calabro, Senior Policy Analyst, x252 Billy Cerullo, Housing Advocacy Organizer Adelle Chenier, Director of Events Esther Colón-Bermúdez, Research Analyst Lakesha Dawson, Director of Operations & Accounting Lindsay Duvall, Senior Organizer for Housing Advocacy, x206 Thaddaeus Elliott, Housing Advocacy Coordinator Dan Emmanuel, Manager, Research, x316 Sarah Gallagher, Vice President, State and Local Policy Innovation, x220 Jamaal Gilani, Director of People and Culture Ed Gramlich, Senior Advisor, x314 Raquel Harati, Research Analyst Danita Humphries, Senior Executive Assistant, x226 Nada Hussein, Project Coordinator, State and Local Innovation, x264 Kenza Idrissi Janati, Tenant Leader Intern Kim Johnson, Senior Director of Policy, x243 Sasha Legagneur, State and Local Innovation Intern Ramon Suzuki Lopez, Field Intern Mayerline Louis-Juste, Senior Communications Specialist, x201 Brendan McKalip, Our Homes, Our Votes Intern Meghan Mertyris, Disaster Housing Recovery Analyst Khara Norris, Vice President of Operations and Finance, x242 Libby O'Neill, Senior Policy Analyst Noah Patton, Manager, Disaster Recovery, x227 Mackenzie Pish, Research Analyst Benja Reilly, Development Coordinator, x234 Katie Renzie, Research Intern Dee Ross, Tenant Leader Fellow Gabrielle Ross, Project Manager, Diversity, Equity, and Inclusion, x208 Craig Schaar, Data Systems Coordinator Brooke Schipporeit, Director, Field Organizing, x233 Kristen Stehling, Fund Development Director Carlton Taylor, Jr., Senior Graphic Communications Coordinator Tejas Telkar, Homelessness and Housing First Policy Intern Cecily Thomas, Development Coordinator Tia Turner, Housing Advocacy Organizer Julie Walker, OSAH Campaign Coordinator Brandon Weil, Graphic Communications Manager Cierra White, IDEAS Intern Chantelle Wilkinson, Vice President, Strategic Partnerships & Campaigns, x230 Renee Willis, President and CEO, x247 Tiara Wood, External Affairs Coordinator