



NATIONAL LOW INCOME
HOUSING COALITION

January 28, 2022

Submitted via email to SSPD@HUD.gov

U.S. Department of Housing and Urban Development
451 7th Street SW
Washington, DC 20410

Re: HUD's Draft FY22-26 Strategic Plan Focus Areas

The National Low Income Housing Coalition (NLIHC) is dedicated to achieving racially and socially equitable public policy that ensures people with the lowest incomes have quality homes that are accessible and affordable in communities of their choice. Our members include state and local housing coalitions, residents of public and assisted housing, nonprofit housing providers, homeless service providers, fair housing organizations, researchers, public housing agencies, private developers and property owners, local and state government agencies, faith-based organizations, and concerned citizens. While our members are drawn from across the spectrum of housing interests, we do not represent any segment of the housing industry. Instead, we focus on achieving policy and funding improvements for extremely low-income people who receive or need federal housing assistance.

More than ever, bold policies are necessary to ensure that America's lowest-income and most marginalized people have accessible, stable, and affordable homes. Even before the pandemic, America was in the grip of an affordable housing crisis that most severely impacted those with the lowest incomes. Today, after two years of surviving the pandemic, these households are even more precariously housed and in need of transformational policies.

We are heartened to see that in its [Draft FY22-26 Strategic Plan focus areas](#), HUD has emphasized the goals of advancing racial equity, increasing the supply and availability of affordable and accessible housing, and investing in climate-resilient housing to protect renters from the impacts of future disasters. As the full strategic plan takes shape, we would like to offer suggestions about how HUD can best address the needs of the lowest-income, most marginalized households and put the country on a path towards ending homelessness and housing poverty once and for all.

Focus Area: Support Underserved Communities

We are pleased that HUD has decided to focus in its strategic plan on supporting underserved communities by advancing housing justice, reducing homelessness, investing in residents, and promoting inclusive communities. In particular, we applaud the Biden-Harris administration for its focus on Housing First, a [proven model](#) for addressing homelessness that prioritizes access to permanent, stable housing and necessary services.

We urge the department to use its strategic plan to make racial equity an explicit goal of federal housing programs and to actively pursue the anti-racist reforms needed to ensure that households with the lowest incomes have affordable places to call home. We also urge HUD to support this effort by collecting, analyzing, and making public data on all programs to clarify whether they exacerbate, ameliorate, or simply leave in place existing or historic patterns of segregation and discrimination in housing and infrastructure, and to remedy those programs found wanting.

To further our shared commitment to supporting underserved communities, we urge HUD to seek and incorporate feedback from people with lived experience when formulating policy priorities, like those reflected in HUD's strategic plan. People with direct experience of housing insecurity and homelessness have important insights into HUD programs and valuable ideas about how to reform these programs to better serve households in need. HUD should commit to a robust process for public comment on this strategic plan and all other policy changes.

HUD should also advance programmatic reforms necessary to ensure the lowest-income and most marginalized households have better access to HUD programs. In particular, HUD's strategic plan should outline how the department will (1) use Small Area Fair Market Rents to give renters greater housing choice; (2) simplify applications and processes for lowering barriers to HUD assistance, including for people exiting the criminal legal system; (3) aggressively enforce fair housing and civil rights laws; and (4) build the capacity of community-based organizations, including those led by Black and Indigenous people and other people of color (BIPOC). To the extent that HUD needs legislative authority to undertake this work, HUD's strategic plan should identify the specific legislative changes that are needed.

Focus Area: Ensure Access to and Increase the Production of Affordable Housing

We support HUD's decision to include in its strategic plan a focus on ensuring access to and increasing the production of affordable housing. As HUD indicates, both rental assistance and increased supply for the lowest-income households are critically necessary for ending the housing crisis in the U.S.

We urge HUD to use its strategic plan to outline a vision for putting the nation on a path to universal housing assistance, a core tenet of President Biden's [housing platform](#). Currently, only [one in four households](#) qualifying for housing assistance receive help. Meanwhile, [eight million](#) of the lowest-income renters lack affordable housing options and are severely housing cost-burdened, spending more than half their limited incomes on rent and utilities every month. Housing assistance is a critical tool for helping people with the lowest incomes afford decent, stable, accessible housing, and the housing assistance program has [a proven track record](#) of reducing homelessness and housing poverty. HUD's strategic plan should include a focus on making funding for housing vouchers mandatory and explore reforms to the delivery of assistance to ensure greater access.

At the same time, we urge HUD to identify in its strategic plan ways to increase and better target federal housing resources to address the underlying cause of America's housing crisis: a market failure that has resulted in a severe shortage of rental homes affordable and available to people with the lowest

incomes. The shortage of affordable homes is almost entirely concentrated among people with extremely low incomes, resulting in a national shortage of nearly [seven million rental homes](#) affordable and available to the lowest-income renters. Indeed, in not a single state or congressional district in the country are there enough affordable, available homes to meet demand.

The Biden-Harris administration must use every available tool to preserve and increase the supply of accessible and affordable homes. While zoning and land use reforms at the local level can increase the supply of housing generally, federal investments are needed to build and preserve decent homes affordable to renters with the lowest incomes. In its strategic plan, the administration should call on Congress to expand resources available for the national [Housing Trust Fund](#), which is the only federal housing resource dedicated exclusively to building, preserving, rehabilitating, and operating housing affordable to people with the lowest incomes. HUD must also outline how it will work with Congress to address the over \$70 billion capital needs backlog needed to preserve public housing. Due to decades of chronic underfunding by Congress, [over 10,000](#) public housing units are lost to disrepair every year, and public housing residents – the [majority](#) of whom are people of color, women with children, people with disabilities, and elderly individuals – are consequently forced to live in sub-standard conditions.

HUD should commit in its strategic plan to advancing reforms to these programs, including increasing the share of federally assisted units that are accessible to people with disabilities; prioritizing the ownership and management of affordable housing by nonprofit organizations, community land trusts, local government, and other not-for-profit entities; and ensuring jurisdictions deploy federal dollars to affirmatively further fair housing and actively deconstruct racial segregation in communities everywhere.

Focus Area: Advance Sustainable Communities

We appreciate that HUD’s strategic plan will focus on ways to advance sustainable communities by strengthening climate resilience and promoting environmental justice.

NLIHC leads the Disaster Housing Recovery Coalition (DHRC), an association of 850 local, state, and national organizations, including many working directly with disaster-impacted communities and with first-hand experience recovering after disasters. The DHRC works to ensure that federal disaster recovery efforts reach all impacted households, including the lowest-income seniors, people with disabilities, families with children, veterans, people experiencing homelessness, and other at-risk populations who are often the hardest-hit by disasters and the least able to access resources to recover afterwards. To support these efforts, the DHRC recently published a two-part report outlining [barriers](#) to achieving complete and equitable recovery and [opportunities](#) for overcoming them.

The Biden-Harris administration’s whole-of-government approach to addressing and mitigating the impacts of climate change – including HUD’s strategic plan – must center the needs of the country’s lowest-income and most marginalized people. HUD’s Community Development Block Grant-Disaster Recovery (CDBG-DR) and Community Development Block Grant-Mitigation (CDBG-MIT) programs are the primary methods for distributing federal funding to disaster-stricken areas for long-term recovery and mitigation activities. Too often, however, these funds are diverted away from those households and

communities with the greatest needs. As a result, low-income communities, and particularly communities of color, are left even more vulnerable to disasters resulting from climate change.

HUD's strategic plan should endorse the "[Reforming Disaster Recovery Act](#)" introduced by Senators Brian Schatz (D-HI) and Susan Collins (R-ME) and indicate HUD's commitment to work with Congress to enact the legislation, which permanently authorizes the CDBG-DR program. The bill would provide important safeguards and tools to help ensure that federal disaster recovery efforts reach all impacted households, including the lowest-income and most marginalized survivors and their communities.

HUD should also commit in its strategic plan to activate [the Disaster Housing Assistance Program \(DHAP\)](#) after every major disaster to provide the longer-term housing assistance, services, and case management needed to help the lowest-income survivors recover. DHAP has been used after past disasters – including Hurricanes Katrina, Rita, Gustav, Ike, and Sandy – to provide low-income, displaced families with safe, decent, and affordable rental homes while they rebuild their lives and get back on their feet. The Trump administration, however, refused to activate the program. The Biden-Harris team should work to reinstate this program in preparation for future disasters. More generally, HUD should advance programmatic reforms to its disaster recovery and mitigation programs. For more information, see the DHRC's comprehensive list of [recommendations](#) for HUD.

Thank you for the opportunity to provide feedback on HUD's Draft FY22-26 Strategic Plan focus areas. For additional information or further discussion, please contact NLIHC Senior Vice President of Public Policy Sarah Saadian at ssaadian@nlihc.org.