



February 7, 2012

The Honorable Judy Biggert  
Chair, House Insurance, Housing & Community Opportunity Subcommittee  
2129 Rayburn House Office Building  
Washington, DC 20515

Dear Madam Chair:

The National Multi Housing Council (NMHC) and the National Apartment Association (NAA) are writing to support the Discussion Draft of the Affordable Housing and Self-sufficiency Improvement Act of 2012. Professional apartment owners, in cooperation with housing administrators, have made great strides in helping low-income families find quality affordable rental housing through the Section 8 program – a partnership that helps communities as a whole. NMHC/NAA support the Section 8 program as a means to engage private housing providers in making affordable rental housing available to families who need it.

NMHC and NAA represent the nation's leading apartment firms. Our combined memberships are engaged in all aspects of the industry, including ownership, development, management and finance. NMHC represents the principal officers of the industry's largest and most prominent firms; NAA is the largest national federation of state and local apartment associations, with 170 state and local affiliates comprised of more than 55,000 members. Together we represent approximately six million apartment homes.

NMHC/NAA strongly support the Section 8 housing choice voucher program, which has long served as America's primary rental subsidy program. However, the program has been plagued with inefficiencies and onerous bureaucratic requirements that increase the cost to rent to a Section 8 voucher holder and discourage private owners from accepting Section 8 vouchers. Owners who participate in the program must sign a three-way lease with the resident and the housing authority, and they are subject to often cumbersome program restrictions, such as repetitive unit inspections, resident eligibility certification and other regulatory paperwork. The inspection provisions alone may hold the unit vacant for weeks, taking control of the unit away from the owner and reducing rental income. With multiple units awaiting inspection, this is a material disincentive for participating in the program.

The program has also been troubled by a flawed and volatile funding system, which has undermined private sector confidence in the program. With the 112th Congress focused on austerity measures and deficit reduction, insufficient funding concerns are expected to increase in the near-term budget cycles. With that in mind, it is imperative that Congress streamline the program to better utilize available resources.

NMHC/NAA are pleased that the legislation establishes positive reforms for the Section 8 program.

**Property Inspections: A Cost Savings Measure**

The proposed changes in the legislation will eliminate multiple inspections of units that have already been inspected for FHA financing or participation in the Low-Income Housing Tax Credit program or other assisted housing programs. This change will continue to ensure housing quality and avoid costly delays currently associated with unit lease-ups under the voucher program.

**Reliable Funding Formula: Encourages Private Sector Participation**

A reliable funding formula is essential. Property owners seek reliability and consistency when participating in federal housing programs, particularly when it comes to funding and financing. The bill utilizes Public Housing Agency leasing data from the previous calendar year to determine funding levels. We are hopeful that past disruptions in the funding formula will be avoided, as they discourage private market participation and negatively affect residents and owners.

**Limited English Proficiency (LEP): Reduces Private Sector Costs**

It is critical that if the U.S. Department of Housing and Urban Development (HUD) requires the translation of "vital" and other documents that HUD also provide the translations, as well as provide access to oral translations. The LEP provision ensures that persons with limited English proficiency have access to accurate documents and that the provision of these documents and services is cost-effective.

Lawmakers should take action to ensure private sector participation in helping the Section 8 program truly meet the affordable housing needs of the nation's citizens. Thank you for your commitment to housing.

Sincerely yours,



Douglas M. Bibby  
President  
National Multi Housing Council



Douglas S. Culkin, CAE  
President  
National Apartment Association

cc: Luis V. Gutierrez, Ranking Member  
House Financial Services Subcommittee on Insurance, Housing and Community Opportunity