



May 29, 2026

Regulations Division  
Office of General Counsel  
U.S. Department of Housing and Urban Development  
2415 Eisenhower Avenue  
Alexandria, VA 22314

Re: Docket No. FR-6144-P-09, HOME Investment Partnerships Program: Further Program Updates and Streamlining

Dear Assistant Secretary Kurtz,

The undersigned national associations represent for-profit and non-profit owners, operators, developers, lenders, property managers and housing cooperatives involved in the provision of rental housing, both affordable and conventional. We appreciate the opportunity to offer comments to the Department of Housing and Urban Development's (HUD) proposed rule, ***HOME Investment Partnerships Program: Further Program Updates and Streamlining***.

We strongly support efforts to streamline the HOME Investment Partnerships Program, which serves as a critical source of funding to provide affordable housing for low-income households. To that end, several of the proposed changes in the proposed rule represent meaningful progress toward lowering costs, reducing barriers to program participation, and expanding affordable housing nationwide. That said, we have serious reservations regarding HUD's proposal to retain the "good cause" eviction standards from the 2025 final rule. This proposal should be excised before these proposed regulations are made final.

Among the most impactful changes offered in the proposed rule would rescind several tenant protection provisions and revert these to the pre-2025 rules. Specifically, we are grateful that HUD is proposing to remove provisions such as the prohibition on business decisions that could subjectively be considered "unreasonable interference and retaliation;" various lease requirements around maintenance timelines, security deposits, tenant organizing protections, and notices of change in ownership; unconditional resident relocation requirements during repairs; and the requirement to accept all forms of rental assistance beyond Housing Choice Vouchers. These modifications will help reduce program complexity and operational uncertainty, allowing housing providers to dedicate more resources to the development and maintenance of affordable housing communities.

Furthermore, we support HUD's effort to correct the 2025 rule's immediate repair obligations and increased inspection schedules by clarifying that these requirements only apply to life-

threatening deficiencies rather than all health and safety deficiencies. This revision establishes a much more workable standard that would allow housing providers to prioritize addressing truly urgent health and safety issues while maintaining quality housing for residents. We also welcome the proposed change to remove the per-unit subsidy bonus for projects that meet certain green building standards, as this provision may result in increased per-unit development costs that ultimately reduce the total number of affordable units produced to serve low-income households.

While several of the proposed changes in the proposed rule represent positive steps toward ensuring HOME resources can be used more effectively to support affordable housing development and operations, we are concerned about HUD's proposal to retain the "good cause" eviction standards from the 2025 final rule. We ask that this proposal be eliminated before these proposed regulations are made final.

Imposing a federal framework on what is inherently a localized process governed by state and local laws can create confusion for housing providers. Layering federal "good cause" standards on top of these existing frameworks can expose housing providers to liability in situations in which state or local law would otherwise permit a non-renewal or termination. If retained in the final rule, this provision would discourage housing providers from participating in the HOME program, ultimately limiting affordable housing options for the low-income residents the program is designed to serve. Accordingly, we request it be removed in the final rule.

We appreciate HUD's continued efforts to streamline the HOME program and reduce onerous regulations that can hinder the development and preservation of affordable housing. Many of the changes in the proposed rule are constructive steps toward improving program administration, increasing operational flexibility, and encouraging broader participation by housing providers. However, we respectfully urge HUD to reconsider the proposed federal "good cause" eviction requirements, as this provision risks adding complexities to just cause standards that are already governed at the state and local level. To ensure that the HOME program remains an effective tool for expanding housing affordability nationwide, it is critical that the program maintains clear standards that support participation and align with existing state and local legal frameworks.

Thank you for your commitment to the HOME program, and our organizations look forward to working with HUD to ensure the program is able to effectively and efficiently serve as many residents as possible.

Sincerely,

Council for Affordable and Rural Housing  
Institute of Real Estate Management  
National Affordable Housing Management  
Association  
National Apartment Association

National Association of Home Builders  
National Association of Housing  
Cooperatives  
National Leased Housing Association  
National Multifamily Housing Council