December 12, 2012

The Honorable Shaun Donovan Secretary of Housing and Urban Development 451 7<sup>th</sup> Street, S.W. Washington, D.C. 20410

Acting Director Jeff Zients Office of Management and Budget 725 17<sup>th</sup> Street, NW Washington, DC 20503

Dear Secretary Donovan and Acting Director Zients,

As the Administration crafts its FY2014 Budget Proposal, we respectfully urge you to fully fund all existing Project-Based Section 8 contracts for 12 months.

We are a coalition of for-profit and non-profit owners, providers, lenders, investors, builders and developers, contract administrators and tenant advocates that rely on stable funding in the Project-Based Section 8 program in order to maintain safe, decent and affordable housing for low-income households. Our members and local partners expect the government to honor its contractual obligations to ensure that seniors, persons with disabilities and families can remain in their homes.

As you are aware, the Project-Based Section 8 program provides critical rental assistance to over one million households across the country, in both urban and rural communities. Over 60% of the residents served by the program are low-income seniors or persons with disabilities who are on fixed incomes. Further, fully funding rental assistance contracts helps maintain a property's financial and physical feasibility, enabling it to remain an affordable, viable housing option for the future.

Unfortunately, HUD's FY13 budget proposed short-funding 10,600 existing contracts and claiming project residual receipts to backfill any shortage in rental assistance payments. <u>Short-funding contracts does not save the federal government money</u>. Rather, it shifts costs into future years while unnecessarily increasing exposure of the Federal Housing Administration (FHA) for the two-thirds of properties that have FHA financing. Full funding provides the stable and consistent operating assistance that property owners need to pay their mortgages on time. In addition, short-funding impacts preservation transactions by eroding investor and lender confidence, leading to increased transaction costs and sidelining rehabilitation projects.

We understand the complexities that go into crafting a fiscally responsible budget that promotes growth and stability and appreciate the hard choices that each department must make. However, reducing funding for a rental assistance program that supports over 100,000 jobs annually, provides nearly \$500 million in local property taxes and reduces taxpayer expenditures in Medicaid and Medicare does not promote economic growth and stability.

The Senate Appropriations Committee recognized the value in fully funding Project-Based Rental Assistance contracts in its FY2013 THUD Appropriations bill and made the critical choice to continue providing adequate resources to support low-income households, observing that "the policy of short-funding contracts…jeopardized the Department's credibility, created administrative inefficiencies and reduced investor confidence."

We request that you take these points into consideration as you develop the FY14 Federal Budget. If you have any questions regarding this letter, please feel free to contact Hilary Swab with the National Housing Trust.

Sincerely,

Affordable Housing Investors Council Affordable Housing Tax Credit Coalition Coastal Enterprises, Inc. Council for Affordable and Rural Housing Community Economic Development Assistance Corporation, MA LeadingAge **Enterprise Community Partners** Housing Partnership Network Local Initiatives Support Corporation Low Income Investment Fund National Affordable Housing Management Association National Association of Home Builders National Council of State Housing Finance Agencies National Housing Conference National Housing Law Project National Housing Trust National Leased Housing Association National Low Income Housing Coalition Network for Oregon Affordable Housing Maine Affordable Housing Coalition Mercy Housing, Inc. The Community Builders Stewards of Affordable Housing for the Future Wisconsin Housing Preservation Corp.