

June 7, 2017

Office of the Secretary
U.S. Department of Agriculture
Office of Budget and Program Analysis,
Room 101–A, 1400 Independence Ave. SW
Washington, DC 20250

FR Doc. 2017–10063 Public comment on proposed reorganization of the U.S. Department of Agriculture, per Executive Order 13781, “Comprehensive Plan for Reorganizing the Executive Branch”

The National Housing Conference (NHC) appreciates the opportunity to comment on the proposed reorganization of the U.S. Department of Agriculture. While we appreciate the Secretary’s interest in elevating rural development, we are concerned that eliminating the Under Secretary for Rural Development (RD) would have the opposite effect. Without a leader to advocate for rural development that can spend time fully understanding the needs of rural America, the programs that exist to meet those needs, and the ways to improve them, it would be challenging for the Secretary to pursue rural development strategies effectively. We welcome a renewed emphasis on rural development and rural housing, and we look forward to working with Secretary Perdue and the department to advance rural housing and strengthen rural communities.

I. About the National Housing Conference

Everyone in America should have equal opportunity to live in a quality, affordable home in a thriving community. The National Housing Conference educates decision makers and the public about housing policies and practices to move housing forward together. NHC convenes and collaborates with our diverse membership and the broader housing and community development sectors to advance our policy, research and communications initiatives to effect positive change at the federal, state and local levels. Founded in 1931, we are a nonpartisan, 501(c)3 nonprofit organization. NHC’s research team operated as the Center for Housing Policy until the organizations merged in 2013.

II. Reorganization poses risks to rural housing and community development

NHC strongly supports elevating rural development as a priority. USDA is the right agency to lead a renewed focus on strengthening and revitalizing rural communities. However, we are concerned that the proposed reorganization signals a lowering of the priority when it comes alongside the administration’s FY 2018 budget request. The president’s budget would defund all rural housing direct loan programs, farmworker housing grants, housing preservation grants, and the Multifamily Preservation and Revitalization program. Without sufficient funding for rural housing and community development needs, elevating Rural Development will be difficult to achieve. Safe, high-quality affordable housing is a persistent challenge for rural communities, in part because the issue has not received sufficient attention. Housing should be part of any strategy to address the needs of rural communities, which requires federal support and funding.

Based on the proposal, all of the other agencies within USDA would continue to have an Undersecretary to lead their work who could also advocate for their needs. Rural Development would not have that voice. The different areas of RD are all very important for rural communities, and an Undersecretary can help weave them together in a holistic strategy.

While NHC appreciates Secretary Perdue's interest in being more involved in rural development, he has many demands upon his time, and an Undersecretary of Rural Development would be a great resource to aid him in elevating rural development within the department.

III. Conclusion

This proposed reorganization cannot elevate Rural Development effectively if the funding for rural housing programs is significantly decreased. The lack of a Rural Development Undersecretary would also make it challenging to truly elevate RD. NHC appreciates the Secretary's interest in rural development and belief that rural development is key to addressing the poverty plaguing rural communities. NHC encourages Secretary Perdue to utilize the Undersecretary position as a resource in his effort to raise the profile of rural development. To discuss any of these comments in further detail, please contact Rebekah King, Policy Associate, National Housing Conference, (202) 466-2121 x248, rking@nhc.org.

Sincerely,



Chris Estes
President and CEO