

United States House of Representatives
Committee on Financial Services
Washington, D.C. 20515

June 26, 2017

Representative Jeb Hensarling
United States House of Representatives
Financial Services Committee
2129 Rayburn House Office Building
Washington, DC 20515

Dear Chairman Hensarling:

We write to request that this Committee hold hearings with the Secretary of the U.S. Department of Housing and Urban Development (HUD) and the Secretary of the U.S. Department of Agriculture (USDA) as witnesses to discuss the Administration's budget request for FY 2018 as it pertains to our nation's federal housing programs, as well as the USDA's proposal to eliminate the Under Secretary of Rural Development (RD). The Administration's budget request for both HUD and USDA's Rural Housing Service (RHS) would impose steep funding cuts on, or complete elimination of, critical housing and community development programs that would ultimately increase homelessness and rent burdens on our most vulnerable American households. This Committee must be vigilant in examining this budget request and the potential negative consequences for individuals and families, including the impact of the rent reform proposals that would increase rent burdens on many of the lowest income households in this country. This would also be an opportunity for Members of the Committee to hear directly from the heads of these key agencies for the first time about their priorities and their vision for these agencies moving forward.

The Administration's FY 2018 budget request would reduce the overall HUD budget by 15 percent, or approximately \$7.4 billion, compared to FY 2017 funding levels. It would impose painful cuts to major rental assistance programs, including Public Housing and the Section 8 Housing Choice Voucher program. It would also completely eliminate key housing and community development programs, including the Community Development Block Grant (CDBG) and HOME Investment Partnerships (HOME) programs. The Administration's budget request would also introduce several harmful legislative proposals that would increase rent burdens for the lowest income households, especially seniors and persons with disabilities. There are serious concerns that these cuts and legislative proposals would result in hundreds of thousands of households losing their rental assistance and struggling to afford their rent as well as other basic necessities. It could also result in displacement with some families unable to afford to stay in their homes and communities. In general, the proposed HUD budget raises serious questions regarding HUD's ability to serve our nation's most vulnerable households, and about this Administration's commitment to carrying forth the statutory mission of HUD.

Similarly, the Administration's FY 2018 budget request for the USDA's RHS programs represents a stunning indifference for the housing and community development needs of our rural communities. It would cut the overall RHS budget by more than 13 percent, or approximately \$273 million, compared to FY 2017 funding levels. It would also completely zero out several key programs, including the Section 502 Single-Family Direct Loan program, the Section 504 Very Low Income Repair Loan and Grant programs, the Section 523 Mutual Self-

Help Housing Grant program, and the Multifamily Preservation and Revitalization demonstration. These are programs that help some of the lowest income households in rural areas access homeownership and financing for home repairs; they also help property owners access to financing for much needed rehabilitation of aging multifamily properties that house low and moderate income residents. Rural residents are already more likely to live in poor housing conditions, and this budget request would only ensure that these conditions get worse. Moreover, the USDA provides virtually no policy rationale for these steep cuts in its budget appendices or the Agency's Explanatory Notes.

The USDA's reorganization proposal adds insult to injury by proposing to eliminate the Under Secretary of RD, who oversees the RHS programs. The proposal suggests that the elimination of the Under Secretary of the RD represents an "elevation" of RD, but it provides no explanation for what protocol would apply in the absence of this key leadership post, or how the new structure would impact RD programs. There are serious concerns that this reorganization would undermine the importance and effectiveness of programs within RD by leaving a void of leadership and oversight. Further, questions have arisen regarding the Administration's legal authority to implement this reorganization,¹ an issue that should be closely scrutinized by this Committee. The USDA has not provided a legal opinion regarding its authority to implement this proposal nor has it provided a timeline for its implementation of this proposal.

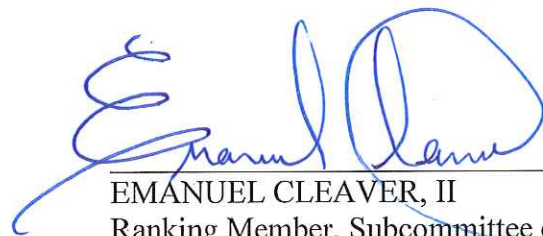
The proposed cuts to both HUD and USDA would undoubtedly increase homelessness and poverty across our nation, including among veterans, seniors, persons with disabilities, and families with children. At a time when our country is experiencing a serious rental housing crisis in which far too many households are struggling with unaffordable rents, and at a time when many of our rural communities are struggling to cope with the ongoing impacts of deindustrialization, this budget represents an irresponsible proposal to take our country in the wrong direction. As the Committee of jurisdiction over these important programs, we must ensure that the Secretaries of HUD and USDA are fully aware of our concerns, and we must also ensure that these agencies are not acting in violation of the law.

Thank you for your consideration of this important request. Please do not hesitate to reach out to me or Esther Kahng and Theresa Dumais with Ranking Member Waters' staff at (202) 225-4247 with any questions about this letter.

Sincerely,



MAXINE WATERS
Ranking Member



EMANUEL CLEAVER, II
Ranking Member, Subcommittee on
Housing and Insurance

¹ May 19, 2017 Letter from the Council for Affordable and Rural Housing, the Institute for Responsible Housing Preservation, the Institute for Real Estate Management, National Leased Housing Association, and National Affordable Housing Management Association to Jeb Hensarling, Chairman of the House Financial Services Committee, and Maxine Waters, Ranking Member of the House Financial Services Committee

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Joyce Beatty
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Josh Gottheimer

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JK

Enclosure:
Letter regarding Proposed Changes to the Rural Development Organizational Structure

May 19, 2017

The Honorable Jeb Hensarling
United States House of Representatives
Chairman
House Financial Services Committee
Room 2228 – Rayburn House Office Building
Washington, D.C. 20515

The Honorable Maxine Waters
United States House of Representatives
Ranking Member
House Financial Services Committee
Room 2221 – Rayburn House Office Building
Washington, D.C. 20515

RE: Proposed Changes to the Rural Development Organizational Structure

Dear Chairman Hensarling and Ranking Member Waters:

We are writing concerning a proposed reorganization by the U.S. Department of Agriculture (the “USDA”) of Rural Development (“RD”). Specifically, on May 11, 2017 (“May 11th Glendenning Memo”), Roger Glendenning, Acting Deputy Under Secretary for Rural Development, issued a letter to all RD employees announcing that “USDA will realign [RD] to report directly to the Secretary [of Agriculture].” To that end, USDA’s plan will eliminate “the position of Under Secretary for Rural Development.” This is happening in conjunction with the creation of another position, the Under Secretary of Agriculture for Trade and Foreign Agricultural Affairs (the “U/Sec TFAA”).

Before proceeding with the proposed reorganization, USDA should know that it lacks the legal authority to eliminate the Under Secretary of Agriculture for Rural Development (the “U/Sec RD”). Regardless of whether USDA may eliminate this position, the agency must nevertheless provide interested parties—including all relevant participants in the rural housing market—ample notice and opportunity to comment before restructuring the program is finally determined. Subsequent to USDA’s final determination on restructuring USDA published a notice in the Federal Register (82 Fed. Reg. 22,802 (May 18, 2017) (“May 18th Notice”) seeking comment by June 14, 2017. However, the after the fact May 18th Notice is legally insufficient, and in all events cannot change the statutory provisions that would need to be changed to remove the U/Sec RD .

A. USDA Lacks the Legal Authority to Eliminate the Under Secretary of Agriculture for Rural Development, and Doing So Would Be Contrary to Law.

In 1994, Congress enacted the Department of Agriculture Reorganization Act of 1994, Pub L. No. 103-354, 7 U.S.C. § 6912, *et seq.*, (the “1994 Act”). That statute authorized the Secretary of Agriculture to establish “the position of Under Secretary of Agriculture for Rural Development.” 7 U.S.C. § 6941(a). The Secretary did so in 1995, when the USDA published the

final rule establishing the position of U/Sec RD. 7 C.F.R. § 2.17; 60 Fed. Reg. 56,392, 56,393 (Nov. 8, 1995).

Once the position was established, the 1994 Act mandated that the Secretary delegate to the U/Sec RD “those functions under the jurisdiction of the Department that are related to rural economic and community development.” 7 U.S.C. § 6941(c)(2). Although the Secretary was merely authorized to create the position in the first place (7 U.S.C. § 6941(a)), the statute makes clear that once the position is created, the Secretary “*shall* delegate” RD functions to the U/Sec RD. 7 U.S.C. § 6941(c)(1) (emphasis added). This alone forbids USDA from eliminating the position of U/Sec RD. It would undermine Congress’s clear command that the Secretary delegate RD functions to the U/Sec RD if the Secretary had the power to eliminate the position and assume RD responsibilities. Eliminating the position of U/Sec RD is contrary to law, and thus subject to judicial revocation under the Administrative Procedure Act (the “APA”). 5 U.S.C. § 706(2)(A) (permitting courts to set aside agency action that is “not in accordance with law”); 5 U.S.C. § 706(2)(C) (permitting courts to set aside agency action that is “in excess of statutory . . . authority”).

The 1994 Act did not permit the Secretary to eliminate the U/Sec RD position. The statute merely authorized its creation, giving no power to the Secretary to rescind its mandatory delegation of RD functions to the U/Sec RD. Any authority to further reorganize RD functions, moreover, lapsed, as the 1994 Act gave the Secretary a two-year deadline to reorganize the USDA. 7 U.S.C. § 7014(a). Under the expiration provision, “the authority delegated to the Secretary . . . to reorganize the Department shall terminate on the date that is 2 years after October 13, 1994.” *Id.* Additionally, that language only applies to the Secretary’s authority to reorganize USDA. It does not revoke a delegation of authority, once made, to the U/Sec RD, nor does it rescind the statutory mandate that the Secretary *shall* delegate RD-related functions to the U/Sec RD.

In its Report on the Proposed 2017 Reorganization of the Department of Agriculture to Establish an Under Secretary for Trade and Foreign Agricultural Affairs (the “May 11 Report”), USDA cites Reorganization Plan No. 2 of 1953 (5 U.S.C. App.; 7 U.S.C. § 2201 note) (the “1953 Plan”) as a legal basis for the proposed reorganization. But this conclusion is untenable in light of the fact that the statute authorizing the 1953 Plan has lapsed, and so too has the reorganizing authority delegated in the 1953 Plan. Congress has not granted the executive branch any general reorganization authority since 1984. Tellingly, USDA is implementing the proposed reorganization in accordance with Executive Order 13781, titled “Comprehensive Plan for Reorganizing the Executive Branch,” which cites no legal authority whatsoever as a justification for a new reorganization. Exec. Order 13781 (Mar. 13, 2017) (“EO 13781”). Indeed, the previous administration saw fit to ask Congress for new reorganization authority, and Congress rejected the request. *See* Advancing U.S. Agricultural Trade: Reorganizing the U.S. Department of Agriculture, National Academy of Public Administration, at p. 77 (October 2015) (the “2015 Report”). That is in keeping with the longstanding position of Congress. Repeatedly, Congress—in which the Constitution vests *all* legislative powers (U.S. Const. art. I, § 1)—has found that reorganization of the executive branch, including USDA, requires congressional authorization. EO 13781, the basis for the proposed reorganization, is thus inapplicable here because Congress has not conferred reorganization authority to the executive that is this

extensive. *See* Presidential Reorganization Authority: History, Recent Initiatives, and Options for Congress, Congressional Research Service at p. 31 (Dec. 11, 2012).

The 1953 Plan states, in relevant part, that the Secretary “may from time to time make such provisions as he shall deem appropriate authorizing the performance by any other officer, or by any agency or employee, of the Department of Agriculture of any function of the Secretary, including any function transferred to the Secretary by the provisions of this reorganization plan.” 7 U.S.C. § 2201 note. Nothing in this authorization, which was issued by President Eisenhower and not Congress, permits the Secretary to reassume power already delegated to another officer of USDA. Moreover, this language only gives the Secretary a *general* power to delegate authority as needed. It does not and cannot override Congress’s *specific* mandate that, once established, the U/Sec RD administers RD. 7 U.S.C. §6941(c)(1).¹

The 1953 Plan makes no mention of RD whatsoever. Rather, the authority to reorganize RD functions comes from the 1994 Act. 7 U.S.C. § 6941(a). That authority has lapsed pursuant to the 1994 Act’s sunset provision. 7 U.S.C. § 7014(a). To be sure, the sunset provision exempts the 1953 Plan. 7 U.S.C. § 7014(b). Nevertheless, it defies logic to conclude that the specific power to reorganize RD survived a sunset provision simply because that provision did not affect the 1953 Plan, which only generally delegated presidential reorganization authority from the President to the Secretary. Because the President lacks reorganization authority originally delegated by the 1949 Act, so too does the Secretary lack reorganization authority delegated by the 1953 Plan. If the 1953 Plan were so encompassing, then it would have permitted the Clinton administration to reorganize RD even without the 1994 Act. But that was not the position the Clinton administration took when President Clinton signed the 1994 Act. In his signing statement, he acknowledged that the 1994 Act granted USDA “critically *needed* authority” to conduct the reorganization. *See* Statement on Signing the Federal Crop Insurance Reform and Department of Agriculture Reorganization Act of 1994 (Oct. 13, 1994) (emphasis added). Surely if the 1994 Act were redundant and the executive had a preexisting authority to conduct such a fundamental reorganization of USDA, the administration would have taken such a position upon signing the legislation. Instead, it took the opposite position, claiming that the authority was needed to undergo a reorganization in the first place.

Like the 1953 Plan, the Agricultural Act of 2014 also makes no mention of RD. That law authorizes the creation of the U/Sec TFAA. It does not permit the Secretary to reassume the immediate authority to administer RD functions. That statute merely directs the Secretary to “propose a reorganization of *international trade functions* for imports and exports of the Department of Agriculture.” 7 U.S.C. § 6935(b)(1) (emphasis added). The statute only gives the Secretary authority to reorganize USDA’s foreign trade-related functions. It gives the Secretary no authority whatsoever to reorganize functions related to rural housing and development.

¹ It is legally untenable and poor public policy to assume that a largely dormant 1953 reorganization directive is still valid when Congress has repeatedly issued new reorganization legislation since then. *See, e.g.*, 7 U.S.C. § 6912(a). The USDA position would have an Eisenhower-era directive on reorganization dictate USDA’s organization over offices that did not exist over 60 years ago, or were created or materially changed since 1953.

At bottom, only Congress can eliminate the U/Sec RD, as Congress had required the Secretary to delegate RD-related functions to the U/Sec RD. 7 U.S.C. §6941(c)(1). This also makes the most public policy sense, as Congress can do so in consultation with the various stakeholders in the rural housing market, including owners and tenants, as well as the public at large.² Waiting for Congressional authorization ensures that the proposed reorganization will be the product of the legislative process and will proceed according to law.

B. USDA Cannot Reorganize RD Functions Without Providing Interested Parties with Adequate Notice and an Opportunity to Comment.

Even assuming Reorganization Plan No. 2 of 1953 is still effective here, USDA must provide interested parties—including the signatories to this letter—with adequate notice and ample opportunity to comment on the proposed on the reorganization.³ Indeed, USDA’s proffered authority for the proposed reorganization, Reorganization Plan No. 2 of 1953, requires this. Specifically, subsection (b) of the 1953 Plan states that for reorganization of major functions:

[The Secretary] shall give appropriate advance public notice of delegations of functions proposed to be made by him and shall afford appropriate opportunity for interested persons and groups to place before the Department of Agriculture their views with respect to such proposed delegations.

7 U.S.C. § 2201 note (emphasis added).

The May 18th Notice itself incorporates the Secretary’s announcement of the new reorganization. *See* 82 Fed. Reg. 22,802. The announcement was conclusory in nature and tone. On its face, the May 18th Notice was an after-thought and responses will receive no serious consideration.

Undoubtedly, RD functions are major. That is, presumably, why Congress required the delegation of RD functions to the U/Sec RD in the first place. *See* 7 U.S.C. §6941(c)(1). RD is no small program, either. As USDA has informed Congress, RD has 4,487 employees for FY2016—far more than the 926 of the Foreign Agricultural Service—and a budget of approximately \$3,078,000,000. *See* Report on the Proposed 2017 Reorganization of the Department of Agriculture to Establish an Under Secretary for Trade and Foreign Agricultural Affairs (the “May 11 Report”), Appendix B.

Like the 1953 Plan, the APA also requires USDA to undergo notice-and-comment rulemaking before implementing the proposed reorganization. 5 U.S.C. § 553. USDA may claim that the proposal is only for internal agency management is thus exempt from notice-and-

² The Agricultural Act of 2014 directed USDA to submit a reorganization proposal. That proposal was contained in the 2015 Report. As noted, the 2015 Report makes clear that USDA sought additional reorganization authority from Congress. 2015 Report at p. 77.

³ No opportunity to comment and no stakeholder consultation occurred. While the 2015 Report noted above provided stakeholder participation for the U/Sec for Trade office, it never raised, contemplated, questioned or consulted about RD in any way or consulted any RD stakeholders.

comment rulemaking under the APA. That, however, would be inconsistent with the USDA's prior practice, as it underwent notice-and-comment rulemaking to implement the 1994 Act. *See* 60 Fed. Reg. 31,766 (June 16, 1995) (proposing "to revise the delegations of authority from the Secretary and general officers due to a reorganization"); 60 Fed. Reg. 56,395 (Nov. 8, 1995) (final rule). Indeed, the 1994 Act, like the 1953 Plan, requires that proposed reorganizations undergo this process. 7 U.S.C. § 6912(c).

The May 18th Notice relies on EO 13781, which does not have the statutory authority necessary to remove the U/Sec RD. Only Congress can remove the authority that has been created by federal statute.

Moreover, in order to implement the removal of the U/Sec RD there must be new regulations once the existing statutory law is amended. A mere Federal Register Notice is not enough. Existing regulations provide not only for the authority of the U/Sec RD (*see, e.g.*, C.F.R. Section 2003.6), but also the Administrators (*see, e.g.*, 7 C.F.R. Section 2003.18) of the constituent agencies, and the authorities of the State Directors (*see, e.g.*, 7 C.F.R. Section 2003.10), all presently reporting to the U/Sec RD, and all regulations must be updated and changed in a manner consistent with administrative authorities. *See* 5 U.S.C. § 551(5) (declaring "rule making" the process by which an agency repeals a rule).

USDA's failure to act in accordance with required procedures renders the proposed reorganization vulnerable to judicial override. *See* 5 U.S.C. § 706(2)(D) (permitting courts to set aside agency action taken "without observance of procedure required by law"). Giving interested parties and the public the opportunity to comment through the rule making process, moreover, will ensure that the agency consider all relevant viewpoints and concerns. This in turn will ensure that USDA enacts the proposed reorganization in a manner consistent with law and considerate of the positions of all relevant stakeholders, including owners and tenants.

C. The Proposed Reorganization Renders RD Vulnerable to Significant Legal Risk.

If implemented, the proposed reorganization would place the administration of RD functions in serious jeopardy of legal challenge. Whenever an agency is constituted in a manner inconsistent with law, its actions while improperly constituted are invalid. *See, e.g., NLRB v. SW General, Inc.*, 580 U.S. ___ (2016) (invalidating agency action taken by an acting general counsel when the law forbade him from exercising the office); *see NLRB v. Noel Canning*, 573 U.S. ___ (2014) (invalidating agency action taken when appointment was in violation of the recess clause); *see also PHH Corp. v. CFPB*, No. 15-11177 (D.C. Cir. Oct. 11, 2016) (invalidating CFPB action because of an improper single-member structure).

The 1994 Act is clear and unambiguous. Once established, the U/Sec RD is in charge of *all* RD functions. 7 U.S.C. § 6941(c)(1). The U/Sec RD, in turn, is appointed by the President on the advice and consent of the Senate. 7 U.S.C. § 6941(b). Although the proposed reorganization purports to elevate RD by making it directly accountable to the Secretary, the effect would be to have RD functions implemented by a hodgepodge of sub-cabinet agency administrators, who are often serving without having been appointed by the President with Senate confirmation. All the more problematic, the upward delegation is still impermissible, as the 1994 Act requires the Secretary to delegate all RD functions to the U/Sec RD. 7 U.S.C. § 6941(c)(1).

As a result, the proposed reorganization will potentially subject RD's administration to endless litigation, thus harming the program's effectiveness. Were RD to, say, deny a payment or a loan restructuring without oversight by the U/Sec RD, and thus contrary to Congress's express word on the program's administration, program participants would resort to litigation. It will not matter if RD's conduct would have been lawful had it been constituted in accordance with law, as being improperly constituted is enough to place any agency action into legal doubt.

D. The Proposed Reorganization is Arbitrary and Capricious.

Neither the May 11 Report nor the letter to RD employees announcing the proposed reorganization detail USDA's actual rationale for eliminating U/Sec RD. The May 11 Report states that moving RD "under the direct supervision will ensure the Secretary is able to leverage USDA's expertise with rural communities and new Administrative initiatives to focus on infrastructure investments in rural America." USDA gives no evidence or rationale to support this conclusory statement. For that reason, a court would be within its power to set it aside for being arbitrary and capricious. See *Allied-Signal, Inc. v. United States Nuclear Regulatory Comm'n*, 988 F.2d 146, 152-53 (D.C. Cir. 1993); see also *Petroleum Commc'ns, Inc. v. FCC*, 22 F.3d 1164, 1172 (D.C. Cir. 1994) ("Where the agency has failed to provide a reasoned explanation, or where the record belies the agency's conclusion, [the court] must undo the action.").

The one explanation USDA is giving—that having RD report directly to the Secretary will elevate the program—is inconsistent with its concurrently stated rationale for creating U/Sec TFAA. According to the May 11 Report, creating the U/Sec TFAA is necessary to connect "growing U.S. [agricultural] production with growing global demand" and to coordinate "USDA's agricultural trade policy." The May 11 Report further states that creating the U/Sec TFAA will strengthen USDA's ability to implement effective agricultural trade policy.

USDA cannot have it both ways. It cannot, with one hand, declare agricultural trade policy as so fundamentally important to necessitate the creation of the U/Sec TFAA, and, with the other hand, state that RD is just somehow too important to merit a sub-Cabinet position overseeing the program. That inconsistent and unreasoned approach is arbitrary.

Moreover, the record USDA has assembled thus far on reorganization absolutely "belies the agency's conclusion." *Petroleum Commc'ns, Inc.*, 22 F.3d at 1172. In 2015, USDA proffered several potential reorganizations to accommodate its rule limiting the USDA to only seven Under Secretaries.⁴ None of those potential reorganizations, however, contemplated eliminating U/Sec RD. See 2015 Report at pp. 49-63. When USDA prepared its report on reorganization in accordance with the Agricultural Act of 2014, it did not include RD as part of any proposed reorganization involving the U/Sec TFAA. The record thus evinces no rationale and no scintilla of evidence that justifies eliminating this important position.

E. Relegating RD, With Nearly 5,000 Employees, More Than \$3 Billion in Appropriations, Tens of Billions of Dollars in Guarantees to Back Office Status is Poor Government Administration

⁴ This practice is itself arbitrary, and to the extent the law ever set such a limit, Congress implicitly increased the limit by authorizing the creation of U/Sec TFAA in 2014.

RD serves the vital core mission of housing nearly a half million rental households, hundreds of thousands of homeowners, supporting community and business needs in countless rural communities. This is a significant program area that requires substantial policy and financial controls and oversight. Relegating it to a political assistant will instantly degrade the ability and quality of operations by destroying morale, alienating stakeholders and chilling any confidence in private parties to invest their capital. Additionally, it will deprive RD of management by individuals with special expertise in the areas of rural housing and community development, further harming the performance of the program.

An analogy can be made to the U.S. Department of Housing and Urban Development (“HUD”), which also has housing and community development programs. RD is in many ways half as large as HUD and it is, properly, a Cabinet level agency. Functions, operations and oversight are simply too wide ranging, and too important to rural Americans to do otherwise. RD, therefore, must at least be a sub-Cabinet office.

The planned reorganization, moreover, is more intricate than the basic proposal described in the May 18th Notice. This was apparent from the Secretary’s May 17, 2017, testimony before the House Agriculture Committee. For instance, the Secretary indicated that RD would still likely have some kind of leadership at the sub-Cabinet level, with Senate confirmation. This appears to contradict the contents of the May 18th Notice, which states that the Secretary will provide direct oversight over RD. *See* 82 Fed. Reg. 22,802. . USDA should instead withdraw its notice of reorganization of the U/Sec RD (there is no evidence the U/Sec for TFAA cannot otherwise proceed) and issue a new Federal Register notice seeking comment on the reorganization and an outline of proposed changes to the offices, delegations of authority and reporting as set out in 7 C.F.R. Parts 2, 2003 and related regulations, along with proposed statutory changes needed to implement such changes. If the replacement official will be an Assistant Secretary, there should be a detailed explanation of the differences between an Assistant Secretary and an Under Secretary. There should also be a description of how the reorganization of the U/Sec RD is a promotion and the common perception that an Assistant Secretary is considered to have less authority than an Under Secretary when the two exist in the same structure. Secretary Perdue stated at his May 17th hearing and in the May 11th Glendenning Memo and May 11th Report that this was a promotion but the information provided does not support that statement. Once these steps are taken, only then will notice be detailed, pre-decisional and legally effective.

Thank you again for the opportunity for this dialogue. Should you need any additional information or have questions regarding this letter, please contact Colleen M. Fisher, Executive Director of the Council for Affordable and Rural Housing, at cfisher@carh.org.

Sincerely,

Council for Affordable and Rural Housing
Institute for Responsible Housing Preservation
Institute for Real Estate Management
National Leased Housing Association
National Affordable Housing Management Association