



April 20, 2021

The Honorable Marcia L. Fudge
Secretary Nominee
U.S. Department of Housing and Urban
Development
451 Seventh Street, S.W.
Washington, DC 20410

The Honorable Thomas J. Vilsack
Secretary
U.S. Department of Agriculture
1400 Independence Ave, S.W.
Washington, DC 20250

Dr. Rochelle P. Walensky
Director
Centers for Disease Control and
Prevention
1600 Clifton Road
Atlanta, GA 30329-4027

The Honorable Janet L. Yellen
Secretary
U.S. Department of Treasury
1500 Pennsylvania Avenue N.W.
Washington, DC 20220

Dear Secretary Fudge, Secretary Vilsack, Director Walensky and Secretary Yellen:

The undersigned national associations represent for-profit and non-profit owners, operators, developers, lenders and property managers and housing cooperatives involved in the provision of rental housing, both affordable and conventional.

We greatly appreciate the commitment that this Administration has made to tackling the devastating impact that the pandemic has had on this country and we applaud efforts to provide the financial relief necessary to stabilize the housing sector. As the country begins to emerge from this crisis, we look forward to working with the Administration to end unsustainable federal restrictions on property operations, effectively and swiftly distribute rental assistance funds and help the country return to normalcy.

This Administration has made significant strides towards ending the COVID-19 crisis. The President's steadfast commitment to a national vaccination goal combined with the additional pandemic related resources included in the American Rescue Plan will go a long way to getting this county on the road to recovery by Independence Day.

As the broad financial assistance from the combined stimulus bills is implemented and Emergency Rental Assistance Program funds are administered, expanded unemployment insurance is distributed, and direct stimulus checks are received, there is great hope on the

horizon. In fact, the country is on track to have most adults eligible to receive a vaccine by April 19; and the unemployment rate dropped to six-percent in March 2021 compared to the high set in April 2020 of 14.8 percent¹. In addition, as reported by [GlobeSt.com](https://www.globe.st.com), “Moody’s Analytics Chief Economist Mark Zandi said the CDC’s [recent extension of federal eviction moratoria](#) will likely be the nation’s last, as the U.S. continues its slow climb out of the coronavirus slump.” Zandi told CNBC, “By the end of June, when this particular extension expires, I think we’ll be in a pretty good place and the moratoriums could end at that point.”

We therefore urge the Administration to allow the current Centers for Disease Control and Prevention (CDC) federal eviction moratorium to expire on June 30 and move beyond this one-size-fits-all strategy for preventing housing displacement. States and localities are best-suited to craft and implement the housing solutions that will benefit their individual market needs.

The expiration of the federal eviction moratorium will be an important catalyst to returning renters to a normal payment schedule and thus providing stability to the housing providers who have been damaged by revenue losses and who may be struggling to pay their mortgages, finance property operations and meet their own financial obligations. Together, the burden the eviction moratorium has placed on housing providers compounds the housing problems the country was already facing before the pandemic.

Our organizations share the goal of the Administration to keep as many renters in their homes as possible, and we are working with policymakers at all levels to make that a reality. The economic upheaval caused by the COVID-19 pandemic put in peril both the homes of millions of American renters and the financial viability of tens of thousands of firms who own and operate those homes. Thankfully, Congress took the necessary step to support the housing market through robust, dedicated rental assistance.

We encourage the Administration to now focus on providing implementation resources and on helping funding grantees disperse rental assistance dollars to those residents and housing providers in need. The first priority should be to ensure that the nearly \$50 billion in rental assistance included in the last two stimulus packages is distributed by the states in a timely and efficient manner. That funding represents a lifesaver for residents and housing providers alike who have been impacted by the pandemic. Therefore, we continue to urge that the Administration reinforce Congressional intent when implementing the Emergency Rental Assistance Program and facilitate a broad and efficient distribution of funds in partnership with housing providers.

Recipient jurisdictions and administering authorities at the state and local levels should be encouraged to avoid overly restrictive income targeting that fails to capture the range of residents in need of housing support, requirements that limit debt collection or force private property owners to absorb renter debt obligations or requirements that include long-term eviction restrictions or interrupt proceedings before the completion of applicant approval. These types of onerous requirements would only further exacerbate the timeliness and distribution of these funds and deter participation in the program.

¹ U.S. Department of Labor, Bureau of Labor Statistics. News Release, “The Employment Situations – March 2021.” April 2, 2021. <https://www.bls.gov/news.release/pdf/empisit.pdf>.

In addition, it is imperative that rental assistance programs be easily executable and expeditiously administered to those in need, including resident self-certification, limiting burdensome paperwork requirements and allowing housing providers to facilitate application efforts on behalf of their residents.

As important as streamlining the process, the transparency and dissemination of information on how residents and housing providers can access the funds is critical to the success of the program. We urge policymakers to make it as easy as possible for those in need to receive the assistance that Congress intended. For example, a centralized portal with information on the administering entities will go a long way in ensuring that the much-needed assistance gets into the hands of eligible recipients. In addition, solutions are needed to overcome barriers created by non-responsive residents. Various documentation and signature requirements are frustrated when residents fail to respond to outreach.

We also support allowing eligible, federally assisted households to participate in the ERAP program, for the tenant-owned portion of rent or utilities that is not subsidized. The Administration must urge states to streamline their programs, so the rental funds get to the intended recipients. Our organizations are committed to working with the Administration to ensure that ERAP is a success, and to keeping as many people in their homes as possible while returning stability to the rental housing sector. To that end, we are studying steps that can be taken between now and the end of the eviction moratorium on June 30 to help ensure that renters and housing providers receive the resources and guidance they need to return to normal payment schedules and property operations. We look forward to sharing our findings and recommendations with the Administration, and to working with you to support a smooth transition out of the eviction moratorium.

Please do not hesitate to contact us with questions or if we can serve as a resource on housing policy issues.

Sincerely,

CCIM Institute
Council for Affordable and Rural Housing
Institute of Real Estate Management
Manufactured Housing Institute
Mortgage Bankers Association
National Affordable Housing Management Association
National Apartment Association
National Association of Home Builders
National Association of Housing Cooperatives
National Association of REALTORS®
National Leased Housing Association
National Multifamily Housing Council

cc: Jacob Leibenluft, Chief Recovery Officer, U.S. Department of Treasury
Rebecca Kelly Slaughter, Acting Chair, Federal Trade Commission
David Uejio, Acting Director, Consumer Financial Protection Bureau