

November 22, 2023

Richard J. Monocchio,
Principal Deputy Assistant Secretary,
Office of Public and Indian Housing

Julia R. Gordon,
Assistant Secretary for Housing,
FHA Commissioner

U.S. Department of Housing and Urban Development
451 7th Street SW
Washington, DC 20410

RE: National Standards for the Physical Inspection of Real Estate (NSPIRE) Conditions Enforcement

Dear Mr. Monocchio and Ms. Gordon,

We are a collective of legal aid, community organizing groups, and affordable low-income housing advocacy organizations concerned about the declining conditions within federally assisted housing. As we detail below, HUD's new National Standards for Physical Inspection of Real Estate (NSPIRE) will fail to protect low-income tenants from harm nor result in material improvements to their housing if HUD does not also change its enforcement practices.

HUD's inspection protocols have remained virtually the same since its inception. Recently, HUD has made efforts to improve its physical inspection protocols. This work has primarily happened through the NSPIRE demonstration. During the demonstration, HUD tested and engaged stakeholders, creating new physical standards, a new inspection process, a new scoring protocol, and new mechanisms for engaging tenants about their experiences. In July 2023, HUD began applying the new NSPIRE standards and inspection protocol to public housing inspections. In October 2023, HUD began applying NSPIRE to its multifamily housing programs.¹ And next year, HUD will begin applying NSPIRE to the voucher programs and its remaining housing programs.²

While we are excited about the many necessary changes made by NSPIRE— allowing tenant organizations to add up to five units to the inspection list, more focus on units' condition,

¹ As described in 24 CFR § 5.701.

² Econ. Growth Reg. Relief and Consumer Prot. Act: Implementation of Nat'l Standards for the Physical Inspection of Real Estate (NSPIRE), Extension of Compliance Date, 88 Fed. Reg. 63971 (September 18, 2023); U.S. Dep't of Hous. and Urb. Dev., PIH 2023-28, Implementation of Nat'l Standards for the Physical Inspection of Real Estate (NSPIRE) Admin. Proc. for the Hous. Choice Voucher (HCV) Program 2 (Sept. 29, 2023).

removal of point deduction caps, and a simplified scoring system—we are concerned that HUD has not coupled the changes to the inspection process with changes in HUD’s enforcement protocol. The changes made by NSPIRE do not address the serious enforcement issues identified in HUD’s Office of Inspector General reports and various news outlets.³

The signatories of this letter serve tenants and communities assisted by a variety of HUD’s housing programs. Our clients and communities face similar challenges as those noted in the OIG and news reports, leaving tenants to live in horrific conditions, displaced, or homeless. While the changes to the inspection protocol are necessary, HUD must also invest new effort into how the agency enforces its physical condition standards, with a specific eye on how its current policies and practices exacerbate living disparities amongst assisted families, including those with disabilities.⁴

The below recommendations reflect necessary and proven strategies for preserving properties’ physical structure and affordability.

CHANGES NEEDED IN HUD’S ENFORCEMENT OF ITS CONDITION STANDARDS

HUD uses inspection scores to inform its oversight.⁵ In particular, the physical inspection score is the primary cause for HUD enforcement action. We are hopeful the new NSPIRE inspection protocol will improve HUD’s ability to assess the health of assisted properties. However, without coupling those changes with changes to its enforcement strategies, we will continue to see properties cycle through HUD’s enforcement and critical housing subsidies lost, at the expense

³ U.S. Dep’t of Hous. and Urb. Dev., Office of Inspector General, HUD Can Improve Its Oversight of the Physical Condition of Public Housing Developments (2023), <https://www.hudoig.gov/reports-publications/report/hud-can-improve-its-oversight-physical-condition-public-housing>; Molly Parker *et al.*, *HUD’s House of Cards*, PROPUBLICA, <https://www.propublica.org/series/huds-house-of-cards> (last visited Sept. 27, 2023); Sarah Smith, *Living Hell*, HOUSTON CHRONICLE (Sept. 27, 2023), <https://www.houstonchronicle.com/news/investigations/article/Living-Hell-housing-tenants-hud-properties-problem-16000650.php>.

⁴ Approximately 45 percent of assisted household heads are elderly persons, and 16 percent are non-elderly persons with disabilities. U.S. Dep’t of Hous. and Urb. Dev., FY 2024 Congressional Justifications, Project-Based Rental Assistance 23-3, https://www.hud.gov/sites/dfiles/CFO/documents/2024_CJ_Program_-_PBRA.pdf. Tenants with disabilities are much more likely to live in housing units that fail to meet basic living standards. Finn Gardiner, Tatjana Meschede & Kartik Trivedi, *Unaffordable, Inadequate, and Dangerous: Housing Disparities for People with Disabilities in the U.S.*, Community Living Policy Center (April 2020), <https://heller.brandeis.edu/community-living-policy/images/pdfpublications/2020aprilhousingbrief.pdf> (“For example, housing units may have leaky roofs, walls with cracks and holes, faulty electrical wiring or plumbing, broken refrigerators, or poorly maintained stairs.”). Nearly 6% of tenants with disabilities report severe inadequacy in their housing compared to just over 3% of tenants without disabilities reporting severe housing inadequacy. [America’s housing affordability crisis: Perpetuating disparities among people with disability - PMC \(nih.gov\)](https://www.pmc.nih.gov/press-releases/2023/07/07/2023-14362/national-standards-for-the-physical-inspection-of-real-estate-and-associated-protocols-scoring). Inaccessible housing can be a major problem for people with disability and is related to increased risk and fear of falls and injuries, poor social participation and quality of life, increased caregiver burden, higher mortality rates, and higher use of social services. *Id.*

⁵ Nat’l Standards for the Physical Inspection of Real Est. and Assoc. Protocols, Scoring Notice, 88 Fed. Reg. 43377, 43379 (July 7, 2023), <https://www.federalregister.gov/documents/2023/07/07/2023-14362/national-standards-for-the-physical-inspection-of-real-estate-and-associated-protocols-scoring>; U.S. Dep’t of Hous. and Urb. Dev., PIH 2023-16, Implementation of Nat’l Standards for the Physical Inspection of Real Estate (NSPIRE) Admin. Procs. 16-17 (Jun. 30, 2023), <https://www.hud.gov/sites/dfiles/OCHCO/documents/2023-16pihn.pdf> [hereinafter *Admin. Notice*].

of the tenants and communities. Focus on enforcement, preservation, and housing quality of site-based assisted units must be a priority for HUD's Offices of Public and Indian Housing and Multifamily Housing. HUD must work collaboratively with tenants and local and state partners to develop and advance these preservation strategies.

Multifamily Housing Specific Strategies

For multifamily housing, HUD has many preservation strategies at its disposal which the agency can use to bring properties back into compliance to ensure long-term affordability.

- **HUD must work more collaboratively with tenants and cities when developing preservation strategies.**⁶ HUD has tremendous success when it actively works with tenants and communities. For example, because HUD Region 5 Office of Multifamily Housing has made a conscious effort to involve communities in its preservation efforts, it has become a stalwart supporter of multifamily preservation initiatives. In Chicago, the Preservation Compact's Interagency Council partners have helped preserve the affordability of 7,000 rental units.⁷ As part of the compact, members, including tenant organizers and legal aid groups, flag at-risk properties and work with HUD, the City of Chicago, the State of Illinois, and the County, to preserve affordable units, improve housing conditions, transfer properties to responsible owners, and protect tenants from displacement.

HUD's proactive partnership with the Preservation Compact, and others, proved critical in the preservation of Grove Parc Plaza.⁸ HUD, as a result of the advocacy of Grove Parc Plaza tenants to preserve their homes, approved the transfer of the property to Preservation of Affordable Housing (POAH). Through the use of a Choice Neighborhoods Initiative grant, Grove Parc Plaza and neighboring parcels were redeveloped, creating nearly 1,000 mixed-income apartments and 90,000 square feet of new commercial and community spaces. Because of this partnership, all 504 Grove Parc Plaza units were replaced,⁹ and the redevelopment of Grove Parc Plaza serves as a national model of collaborative, tenant-centered preservation.¹⁰

⁶ Comment Letter from Nat'l Hous. Law Project *et al.* on Docket No. 6086-N-02 Request for Comments: National Standards for the Physical Inspection of Real Estate and Associated Protocols 10-11 (Aug. 10, 2022), <https://www.nhlp.org/wp-content/uploads/Final-Comment-Letter-for-87-Fed.-Reg.-36426.pdf>.

⁷ Impact, PRESERVATION COMPACT, <https://www.preservationcompact.org/about-us/-impact> (last visited Oct. 27, 2023).

⁸ Keystone Initiatives Update, PRESERVATION COMPACT, <https://www.preservationcompact.org/newsletters/201006/keystone.html> (last visited Sept. 29, 2023).

⁹ *PreservationNext: A Preservation Toolkit for Small-to medium-scale Multifamily Properties, The Washington At Woodlawn Park*, ENTERPRISE, <https://preservation-next.enterprisecommunity.org/washington-woodlawn-park> (last visited Oct. 27, 2023).

¹⁰ *Id.*; *Community-Driven Redevelopment of Chicago's Woodlawn Neighborhood Results in \$400 Million in Resources and Positive Outcomes for Residents*, PRES. OF AFFORDABLE HOUS. (March 3, 2022), <https://www.poah.org/news/community-driven-redevelopment-chicago%E2%80%99s-woodlawn-neighborhood-results-400-million-resources>.

- **Where available, HUD should seek receivership on its own or support efforts by lenders, local governments, or others to appoint a receiver.** Ellis Lakeview has a project-based rental assistance (PBRA) subsidy contract and a loan backed by Freddie Mac. When the city sought a receiver in its action enforcing the city's condition standards,¹¹ HUD supported the city's request. HUD committed to assigning the subsidy contract to the proposed receiver. The court then decided to require a change in management that mirrored the structure of a receivership.¹² Most recently, Freddie Mac initiated foreclosure proceedings and the appointment of a receiver.¹³ HUD will again assign the subsidy contract to the appointed receiver. HUD's commitment to assigning the subsidy contract to the receiver ensures there are financial resources available for the receiver to make necessary repairs.
- As also done at Ellis Lakeview, **abate but do not terminate the subsidy contract, including partial abatement, as determined by the Secretary, for the purpose of correcting serious deficiencies.**¹⁴ Abated funds should be used solely for the purpose of supporting safe and sanitary conditions at applicable properties.
- **Impose civil money penalties, which shall be used solely for the purpose of supporting safe and sanitary conditions at applicable properties,** as designated by the Secretary, with priority given to the tenants of the property affected by the penalty.¹⁵
- Require the termination of the management agent or the sale of the property.
- When reviewing Transfer of Physical Asset (TPA) requests, HUD's approval must prioritize purchasers who demonstrate a capacity to bring the asset back into compliance quickly and maintain the property in a HUD housing program for the long term. The buyer must demonstrate to HUD that they have the resources to address severe health &

¹¹ Maxwell Evans, *Troubled Kenwood Apartment Building's Management Company Will Be Kicked Out But Judge Stops Short Of Replacing Owner*, BOOKCLUB CHICAGO (Jun. 3, 2022), <https://blockclubchicago.org/2022/06/03/ellis-lakeviews-management-company-will-be-kicked-out-but-judge-stops-short-of-replacing-owner/>.

¹² Maxwell Evans, *After Marathon Battle, Ellis Lakeview Residents 'Excited,' 'Anxious' For New Management To Take Over*, BOOKCLUB CHICAGO (Jun. 10, 2022), <https://blockclubchicago.org/2022/06/10/after-marathon-battle-ellis-lakeview-residents-excited-anxious-for-new-management-to-take-over-friday/>.

¹³ Maxwell Evans, *Feds Move To Foreclose On Kenwood Affordable Apartments, Citing Owner's 'Willful Neglect'*, BOOKCLUB CHICAGO (August 2, 2023), <https://blockclubchicago.org/2023/08/02/feds-move-to-foreclose-on-kenwood-affordable-apartments-citing-owners-willful-neglect/>.

¹⁴ Maxwell Evans, *Feds Tell Ellis Lakeview Owners: Get A New Property Manager And Fix Filthy Conditions — Or Else*, BOOKCLUB CHICAGO (March 8, 2021), <https://blockclubchicago.org/2021/03/08/feds-boot-ellis-lakeview-property-manager-for-not-resolving-filthy-conditions-as-residents-push-city-to-sue-owner/>.

¹⁵ Press Release, U.S. Dep't of Hous. and Urb. Dev., Office of Inspector General, HUD Awarded a \$1.2 Million Civil Money Penalty Against Apex Waukegan LLC and Integra Affordable Management LLC for Not Providing Decent, Safe, Sanitary Housing Conditions (Fe. 14, 2023), <https://www.hudoig.gov/sites/default/files/2023-02/Press%20Release%20-%20Apex%20Waukegan%20LLC%20and%20Integra%20Affordable%20Management%20LLC%20Fined%20for%20Breach%20of%20Contract.pdf>.

safety repairs and have a long-term rehabilitation plan created in consultation with the tenants. HUD must condition rent increases on proof that the increase will address outstanding capital needs.

- HUD must enhance its technology and procedures to detect owners and agents who have a history of improperly administering the program or not maintaining assisted properties; moreover, HUD must remain vigilant of such entities that attempt to re-enter programs under different names.

Public Housing Specific Strategies

For the public housing program, HUD should also work with impacted tenants and localities to preserve this important supply of site-based housing. This includes deploying available tools to improve housing conditions and site-based housing preservation, such as converting the property under the Rental Assistance Demonstration (“RAD”) program, RAD/Section 18 Blend, or Faircloth to RAD. Public housing authorities (PHAs) can then leverage the financial resources necessary to improve housing conditions and preserve the housing.

It must also include providing more support to low-performing and low-capacity PHAs. This includes necessary technical assistance so that a PHA can explore preservation, rather than demolition, disposition, or streamlined voluntary conversion. This is especially important since the lower-capacity PHAs are often in communities where the public housing may be the only source of site-based affordable housing.

For many properties considering a RAD conversion, the conditions tenants are living in are quite poor. Thus, during **RAD conversions, HUD should require housing providers to continue to comply with all existing inspections and should waive only the inspection required under Section 8(o)(8)(A) of the U.S. Housing Act of 1937 to allow assistance under a HAP contract to begin.** Generally, HUD-assisted housing must be inspected to meet HUD’s minimum quality standards before assistance can be paid on behalf of an assisted household, unless the PHA is using the HOTMA “non-life threatening” and “alternative inspection” flexibilities.¹⁶ For public housing units planned for conversion under RAD (including RAD/Section 18 Blends), HUD waived all inspection requirements until the date of the completion of the conditions-related work as stated on the RAD Conversion Commitment.¹⁷ Further, HUD has recently established an alternative initial inspection requirement for units to be added to the HAP Contract. HUD may now rely on the owner’s certification “that the owner has no reasonable basis to have knowledge

¹⁶ Hous. Opportunity Through Modernization Act of 2016, Pub. L. No. 114-201, §100, 130 Stat. 782, 783-86; U.S. Dep’t of Hous. and Urb. Dev., PIH 2017-20, Hous. Opportunity Through Modernization Act of 2016 (HOTMA) – Hous. Quality Standards (HQS) Implementation Guidance (Oct. 27, 2017), <https://www.hud.gov/sites/dfiles/PIH/documents/PIH-2017-20.pdf>

¹⁷ See U.S. Dep’t of Hous. and Urb. Dev., PIH 2019-23, Rental Assistance Demonstration – Supplemental Notice 4B 24-25 (Jul. 27, 2023), https://www.hud.gov/sites/dfiles/Housing/documents/RADSupplementalNotice4B%20_FINAL.pdf.

that life-threatening conditions exist in the unit(s).”¹⁸ While it may be expeditious for RAD closings to waive the initial inspection required under Section 8(o)(8)(A) of the Housing Act of 1937 and to allow assistance to begin as soon as possible, the broad waiver of any and all inspections from the RAD closing to the completion of all work, except “when needed,” unnecessarily puts at risk the hundreds of thousands of households with long-outstanding work-orders who depend on HUD-inspections and threat of enforcement to receive any remedial action for non-life threatening but urgent work. Without any regularly required inspections, residents in projects converting under RAD will likely be forced to live in worsening, unhealthy, unsafe, and dangerous conditions without any relief for years.

CONFIRMATION OF DEFECT REMEDIATION & RELOCATION

Thank you for requiring the relocation of families when the mold is life-threatening or severe, and encouraging housing providers to temporarily relocate tenants if a life-threatening or severe defect (beyond mold) cannot be corrected within 24-hours.¹⁹ HUD’s guidance expresses its expectation that repairs be “permanent fixes,” but permits housing providers to seek HUD’s approval for temporary repairs.²⁰ However, HUD should require housing providers to relocate families when life-threatening or severe defects cannot be corrected within 24 hours. When the housing provider makes temporary repairs instead of permanent fixes, HUD must require photographic or video evidence that the temporary repair fully removes the risk to families’ lives and safety. Without these additional requirements, housing providers will not take seriously the urgency to correct these defects.

Relocation is an important tool for immediately improving tenants’ living conditions, but it is in dire need of HUD oversight. Relocation can be disruptive to families, including moving them away from schools, employment, public transit, community ties, and necessary social services. It can also make it more difficult for them to maintain their subsidy. The priority of a relocation must be improving tenants’ quality of life while not putting housing subsidies or housing affordability at risk. **HUD must review and approve all relocation plans, examining if tenant relocation protects their housing subsidies, improves housing conditions, and protects them from housing cost increases.** Factors HUD should consider include if there are improved living conditions, tenants’ ability to maintain similar if not the same life routines (i.e., school, employment, access to transit), and minimal new administrative hurdles. HUD should obligate the owner to first evaluate if on-site relocation is possible, and then consider if moves can occur within a small radius from the original community. Any off-site relocation must consider if households can continue to access their health and wellness service providers, educational & employment opportunities; if there are any increases to household housing costs; that rent payment policies, utility allowances, and recertifications are handled in a similar or less

¹⁸ See *id.* at 24.

¹⁹ See Admin. Notice, *supra* note 5, at 10, 11, 14-15.

²⁰ *Id.* at 11.

burdensome fashion; and how housing providers will proactively minimize any disruption in tenants' subsidy.

Where the PHA or owner does not have units that can be made available to relocating tenants, HUD must require pass-through leases where there is a primary lease between the two landlords, referencing and not overriding the current leases and subsidy rights tenants have through HUD's housing program. The primary lease between the landlords must explicitly and clearly describe the unique legal relationship between them and the relocating tenants, the tenants' rights under their leases, and tenant protections under the applicable subsidy program.²¹ There can be no limitation or rescreening placed upon the tenants' right to return to their original developments.

We are excited to see HUD will require inspectors to document the source and contributors of moisture and mold growth.²² Tenants in properties with mold continue to report that mold remediation is insufficient, with PHAs and owners often covering mold-infested drywall with new drywall.²³ When confirming remediation of mold-like substance and, or moisture leaks, **HUD must require, rather than make optional, photographic or video evidence of the removal and replacement of drywall and any materials behind the drywall.** Housing providers must also demonstrate that the source of the mold, such as a leaking roof, has been addressed.

And finally, for life-threatening and severe pest infestation, HUD considers the initiation or ongoing implementation of an "appropriate pest management plan" as a correction.²⁴ **Before the next inspection, HUD must assess if the pest management remediation plan has effectively minimized and prevented the presence of pests.** As part of its assessment, HUD should establish measurable benchmarks with timelines and consult all affected tenants about their experience with pests. Coupling tenant experiences and measurable benchmarks will allow HUD to assess whether the instituted remediation plan has improved tenants' experiences while documenting the housing provider's attempts to improve physical conditions. Where HUD has determined that the pest management plan has not effectively improved conditions, HUD must require housing providers to secure more effective pest management services. They must also be

²¹ Sean Keenan, *Atlanta Officials Promise Quick Fixes for Ex-Forest Cove Tenants' Lingering Challenges*, ATLANTA CIVIC CIRCLE (February 15, 2023), <https://atlantaciviccircle.org/2023/02/15/atlanta-leaders-promise-quick-help-for-forest-cove/>.

²² Admin. Notice, *supra* note 5, at 15.

²³ For example, in April 2014, a federal district judge in New York approved a settlement requiring NYCHA to remediate mold and moisture promptly as a reasonable accommodation under the Americans with Disabilities Act (ADA). The lawsuit was brought on behalf of the many New York public housing residents, including children, who have chronic asthma and other health conditions that are severely aggravated by mold and moisture in their homes. NYCHA has failed to remain in compliance with the settlement agreement, highlighting the importance of mold remediation enforcement for PHAs. *Baez v. New York City Housing Authority*, NRDC.ORG (Feb. 07, 2023), <https://www.nrdc.org/court-battles/baez-v-new-york-city-housing-authority>; Nicole Greenfield, *After Decades, Tenants are Still Fighting NYC Public Housing for Speedy Mold Relief*, National Resources Defense Counsel (September 21, 2023), <https://www.nrdc.org/stories/after-decades-tenants-are-still-fighting-nyc-public-housing-speedy-mold-relief>.

²⁴ Admin Notice, *supra* note 5, at 14.

required to relocate tenants who are experiencing infestation or have serious health implications due to pests, such as the exacerbation of asthma and other lung diseases.

ADDITIONAL RESIDENT ENGAGEMENT MECHANISMS NEEDED

We appreciate HUD adopting the National Alliance of HUD Tenants' (NAHT) recommendations to allow tenants to add units to the inspection list and instituting resident surveys. However, HUD's announced engagement does not fully capture NAHT's recommendations.²⁵ HUD encourages tenants to report condition issues,²⁶ but does not provide a reliable process for getting improved conditions when housing providers are unresponsive to their maintenance requests. Specifically, HUD choosing to not include tenant-selected units as part of the score's calculation does little to root out internal unit conditions hidden by the prior system. Tenants can provide vital information that will signal HUD intervention is necessary. **HUD must meaningfully incorporate tenants into its oversight and enforcement process.** HUD can achieve this by—

- Including tenant-selected units in the calculation of properties' inspection scores.
- Using its current authority, HUD must remove 24 CFR § 5.713 and provide assisted families with third-party beneficiary status to allow them the ability to judicially enforce HUD's condition standards and give tenants the right to withhold rent for unremediated habitability issues in all of its housing programs.²⁷
- Adopting a regulation similar to 24 CFR 966.4(h)(4) for the multifamily housing program, so that tenants in the project-based Section 8 program are also able to abate rent when conditions are serious and repairs are not made in a reasonable period of time or alternative accommodations provided. Given the reticence of HUD multifamily owners to relocation, this provision can motivate them to take housing repairs seriously.
- Modifying 24 CFR § 5.711(h)(2)(iii) to remove the 60-day limit on residents' ability to review and copy inspection reports and associated documents.

²⁵ Compare Comment Letter from Nat'l Alliance of HUD Tenants on Docket No. FR-6086-P-01 Economic Growth Regulatory Relief and Consumer Protection Act: Implementation of National Standards for the Physical Inspection of Real Estate (NSPIRE) to U.S. Dep't of Hous. and Urb. Dev. 7-8 (Mar. 15, 2021), <https://www.regulations.gov/comment/HUD-2021-0005-0067> with Admin. Notice, *supra* note 5, at 17-18 & U.S. Dep't of Hous. and Urb. Dev., PIH 2023-24, Implementation of a Voluntary and Anonymous HUD Inspection Feedback Survey for Incorporation into the National Standards for the Physical Inspection of Real Estate Program (Aug. 31, 2023), <https://www.hud.gov/sites/dfiles/PIH/documents/PIH2023-24.pdf>.

²⁶ Admin. Notice, *supra* note 5, at 18.

²⁷ Comment letter from Nat'l Hous. Law Project & Earthjustice on Docket No. FR-6086-P-01 Economic Growth Regulatory Relief and Consumer Protection Act: Implementation of National Standards for the Physical Inspection of Real Estate (NSPIRE) to U.S. Dep't of Hous. and Urban Dev. 30 (Mar. 15, 2021), https://www.nhlp.org/wp-content/uploads/NHLP_Earthjustice_Comments-for-86-FR-2582.pdf.

- Actively collaborating with tenants and other local stakeholders, as described *supra*, to develop preservation plans to bring troubled assets back into compliance and to prevent the loss of this important supply of affordable housing. HUD's lack of direct communication with tenants and community stakeholders creates confusion and breeds mistrust. HUD must be transparent about its enforcement strategy and give stakeholders, in particular affected tenants, an opportunity to be partners in the preservation of the property.
- Creating an early warning system to flag properties on their way to becoming troubled. That system must provide a means for residents to elevate their concerns and receive corrective action. The system must allow HUD to track individual tenant complaints, as well as identify patterns at particular properties or amongst particular housing providers or management agents.
- Enforcing 24 CFR parts 964 and 245 against housing providers and management whose actions interfere with or disincentivize tenant organizing.

We would like an opportunity to speak with you about why these recommended actions are so critical to getting this issue right. We kindly request a meeting with you and your staff to discuss this important issue. We look forward to partnering with HUD on protecting tenants and strengthening communities across the country.

Thank you for your consideration.

Coalition for Economic Survival

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Everyone for Accessible Community Housing Rolls!

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