

July 18, 2008

The Honorable Herb Kohl
Committee on Appropriations
USDA Subcommittee
United State Senate
330 Hart Senate Office Building
Washington, D.C. 20510

The Honorable Robert Bennett
Committee on Appropriations
USDA Subcommittee
United State Senate
431 Dirksen Senate Office Building
Washington, D.C. 20510

The Honorable Rosa DeLauro
Committee on Appropriations
USDA Subcommittee
United State House of Representatives
2262 Rayburn House Office Building
Washington, D.C. 20515

The Honorable Jack Kingston
Committee on Appropriations
USDA Subcommittee
United State House of Representatives
2368 Rayburn House Office Building
Washington, D.C. 20515

Dear Rural Housing Appropriators,

We, the undersigned, are national trade associations, which represent owners and management agents participating in federal affordable multifamily and public housing programs. We are respectfully requesting your support for language in the FY 2009 Appropriations Bill that would authorize USDA Rural Housing Service (RHS) to allow housing providers to use information from the interagency databases in HUD's Enterprise Income Verification (EIV) System for income verification.

Access to the EIV system would allow rural housing providers to check reported income against Social Security (SS), Supplemental Security Income (SSI), new hires (W-4), and wage and unemployment compensation records, ensuring the right benefits go to the right people and create savings for the program. HUD gained access to the HHS and SSA databases through language in the FY 2004 Consolidated Appropriations, permitting HUD to conduct income and employment matching with the National Directory of New Hires for HUD tenants in PHAs. Access to EIV was eventually extended to private owners of assisted housing and HUD's contract administrators. The income-matching program made possible through EIV has already demonstrated significant results in improving the accuracy of rental subsidies in a short period of time.

However, RHS is not a part of the computer matching agreements needed to access EIV. This is problematic for our members who managed mixed-financed affordable rental properties and who must use third parties to certify incomes for RHS tenants. Without access to this information, housing providers may miss unreported income due to inaccurate or incomplete information.

We strongly believe it is in the best interest of public policy for RHS to join the interagency partnership. In this budget environment, every dollar is precious. With so many families in need of assistance, it is essential that the correct subsidies are provided only to qualified families. Furthermore, mixed subsidies and layered financing are the future of affordable housing funding. Without increasing agencies' access to EIV, it will become increasingly difficult to categorize and verify incomes of the tenants in mixed subsidy properties. It would greatly simplify the owner or agent's job if they could use EIV for income verification for all tenants in the same affordable housing community.

Please feel free to direct any questions or concerns to Michelle Kitchen, of the National Affordable Housing Management Association at 703-683-8630 x 11.

Sincerely,

Council for Affordable and Rural Housing
Institute of Real Estate Management
National Affordable Housing Management Association
National Apartment Association
National Association of Housing and Redevelopment Officials
National Leased Housing Association
National Multi Housing Council

cc: The Honorable Robert C. Byrd
The Honorable Thad Cochran
The Honorable Christopher Dodd
The Honorable Charles Schumer
The Honorable Richard Shelby
The Honorable Mike Crapo
The Honorable David Obey
The Honorable Jerry Lewis
The Honorable Barney Frank
The Honorable Spencer Bachus
The Honorable Maxine Waters
The Honorable Shelley Moore Capito