

DRAFT SOLICITATION # 86546A18R00001

Housing Assistance Payments (HAP) Contract National Support Services (HAPNSS)

TO: [HAPNSS@hud.gov](mailto:HAPNSS@hud.gov)

January 31, 2018

TO WHOM IT MAY CONERN:

The undersigned organizations comprised of owners and managers of assisted Section 8 housing, appreciate the opportunity to comment on the methodology concerning creating National Support Services for Housing Assistance Payments (HAPs) through the Housing Assistance Payments (HAP) Contract National Support Services (HAPNSS) program, formerly known as the Performance Based Contract Administrator Program (PBCA). However, we have concerns that this proposal will not result in the successful management of the Section 8 HAP contract administrative process.

If the administration of Section 8 HAP payments is to be successful, both the public and private sector need to work together. We urge you to further refine the methodology in a manner that takes into consideration both the views of owners and administrators to effectively utilize our limited housing resources. An overview of our concerns is enclosed for your review:

**Public Private Partnerships** – We urge further outreach to the stakeholders, as the proposal does not fully consider the owners perspective. Policymakers must recognize that addressing assisted housing needs requires a partnership between government and the private sector.

**National Contractor Consolidation** – While some regional consolidation may make sense, we are very concerned with the proposal to consolidate all contract administration, for renewals and rent adjustments into one entity. Administering 17,000 annual contracts could result in untimely reviews, negatively impacting sound business practices that the private sector needs to successfully provide housing for our residents.

**Bifurcation of Contract Administration** - Bifurcating national contractor and regional contract administration duties will only serve to place more pressure on the assisted housing portfolio. Many transactions are complex, bifurcating these resources will impede timely responses, creating a disincentive for owners to participate in the program, at a time when preservation and recapitalization is most needed.

The nation's challenge is to reduce the barriers and obstacles that inhibit the preservation and expansion of our assisted housing stock. The proposal as outlined, does not reduce barriers or encourage preservation – it is inefficient. We appreciate your continued

involvement of the impacted industry in this process. But for now, we urge you withdraw the proposal and seek further input from the private sector participants.

Thank you and we look forward to working with you moving forward to create a system that is efficient, fair and works for all parties.

Sincerely,

Council for Affordable and Rural Housing  
Institute of Real Estate Management  
National Affordable Housing Management Association  
National Apartment Association  
National Association of Home Builders  
National Association of Housing Cooperatives  
National Leased Housing Association  
National Multifamily Housing Council