

August 2, 2022

The Honorable Maxine Waters
Chairwoman
Committee on Financial Services
United States House of Representatives
Washington, D.C. 20515

The Honorable Patrick McHenry
Ranking Member
Committee on Financial Services
United States House of Representatives
Washington, D.C. 20515

Dear Chairwoman Waters and Ranking Member McHenry:

We write regarding H.R.7981 - Public and Federally Assisted Housing Fire Safety Act of 2022. On behalf of housing providers nationwide, we support the goal of this legislation to provide reliable smoke alarms in federally assisted housing, but remain concerned that several portions of the bill are counterproductive or unattainable due to product limitations. We appreciate the opportunity to share our perspective and are committed to working with you to produce final legislation that supports safe and affordable housing for America's renters.

The bill recognizes that existing buildings face specific installation challenges and the ability to use a 10-year battery provides a critical compliance pathway that addresses significant constructability and cost concerns. However, this highly-effective solution is negated when bundled with the requirements for persons with hearing loss. Compliance with the National Fire Protection Association (NFPA) 72 using a 10-year, non-rechargeable, sealed battery smoke detector as required by this legislation is not possible as no such product exists. According to the NFPA, there is no smoke alarm capable of emitting the low frequency 520 Hz required by the NFPA 72 to notify persons with hearing loss. Furthermore, the bill's hearing loss provisions are overly broad and will require the unnecessary installation of equipment in all federally assisted housing instead of focusing efforts on solutions for occupants actually experiencing hearing loss. This creates an undue burden on federally assisted housing providers and is a misuse of valuable federal dollars.

We applaud your efforts to create safer housing for federally assisted housing residents, but the final version of this legislation needs to provide cost-effective and feasible solutions for residents and housing providers alike. We request that changes are made to H.R. 7981 prior to Senate action to allow for flexibilities regarding compliance with NFPA 72 while still providing suitable notifications for persons with hearing loss. Additionally, we would like to see the hearing loss portions of the legislation apply only to units where a person with hearing loss resides. We look forward to working with you to ensure these improvements are included in the final version of this legislation.

Thank you for considering our views.

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