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April 2, 2008

Regulations Division, Office of General Counsel
U.S. Department of Housing and Urban Development
451 Seventh Street, SW
Room 10276
Washington, DC 20410-0500

**RE: Independent Public Accountant Roster, Proposed Rule
Docket No. FR-5054-P-01
RIN 2501-AD20**

Dear Sir or Madam:

The National Affordable Housing Management Association (NAHMA) is a trade association that represents management agents and owners involved in federal rental assistance programs. Executives of property management companies, owners of affordable rental housing, public agencies and vendors that serve the affordable housing industry constitute our membership.

Having reviewed the proposed rule, "Independent Public Accountant (IPA) Roster," NAHMA respectfully submits these comments in opposition. We believe the proposed rule is unnecessary as CPAs must be licensed, unhelpful as HUD is not endorsing any of the "allowable accountants," infringes on owners' rights to choose qualified financial professionals, and threatens to drive up the price of audit services by limiting the supply of available providers.

We understand the rule is intended to ensure the quality and accuracy of financial data submitted to HUD by program participants through the establishment of a list of "allowable accountants". However, NAHMA believes that the new roster and the costs associated with its creation and maintenance are unnecessary to ensure quality data. Our members believe that the current standards CPAs must meet in order to practice are sufficient guarantees of accurate data. These standards include general and state licensure requirements, auditing and accounting standards, continuing education requirements, and quality review by another CPA every three years. Maintaining such a list diverts taxpayer dollars that could be used more effectively elsewhere and causes undue costs on both the CPAs to maintain HUD's proposed standards and burdening property managers to find HUD-approved CPAs.

NAHMA finds it problematic that HUD would not endorse any specific allowable accountants to perform audits, despite creating an eligible IPA roster. Furthermore, an IPA roster micromanages a housing provider's right to choose a qualified financial professional to perform an audit. Considering the numerous regulations, standards, and licensing limitations already imposed on CPAs, we are unclear how further criteria imposed by HUD will improve the quality of the audits or resulting financial data.

Because of the added monetary and time costs, NAHMA echoes the Governmental Audit Quality Center's concern that quality CPA firms may decide that the proposed registration process is not worth the effort or risk to their practice and decide to abandon their HUD audit practices. This would reduce the number of CPAs available to perform audits and likely increase audit prices. These outcomes are disadvantageous to HUD, owners, and the property managers.

In closing, NAHMA respectfully restates our opposition to this proposed rule. We recognize the proposed rule intends to improve the accuracy of financial data for HUD subsidized properties; however, we fear it is far more likely to result in an undue burden, not only to our members, but to the accounting industry as well. We urge the Department not to implement these proposed changes.

Sincerely,

A handwritten signature in black ink, appearing to read "Kris Cook". The signature is fluid and cursive, with the first name "Kris" being more prominent than the last name "Cook".

Kris Cook, CAE
Executive Director