



Time For A Fresh Start

It's hard to find anyone willing to make the statement that 2005 was a banner year. What with natural disasters like the tsunami in Asia, and Hurricanes Katrina and Rita here in the US, we are reminded that the economically disadvantaged will always be disproportionately impacted when their homes are destroyed. At the same time, we struggle with issues like cutbacks in the number of Section 8 vouchers that are available (recent analyses show that New York will bear a disproportionately heavy loss of those vouchers), attempts by the Bush administration to eliminate the CDBG program, and donor fatigue have all combined to make our jobs just that much more difficult. Of course, many RPC's are still picking up the pieces from last year's 50% funding cuts, and just now really feeling the impact of those cuts.

However, are there rays of hope shining towards us in the New Year? Or perhaps more importantly, how do we take the current situation and make our own rays of hope? Certainly, the timing seems to be right for making significant change- the pending race for a new Governor for our state is an obvious opportunity for proponents of affordable housing and revitalization of our upstate rural communities to reach out to candidates and make sure that our concerns are part of the policy discussions of the new administration in Albany.

In addition, there are other programmatic opportunities just being implemented, or on the horizon, that offer us the rare occasion to stop and review carefully what programs and initiatives we offer, and rethink how they fit into our communities' goals for the future.

For instance, in response to the attacks on the CDBG program in Washington, HUD is implementing a program of performance based measurements that will have to be implemented by the Governor's Office for Small Cities. Rather than viewing this requirement as an additional administrative burden, perhaps we can look at this as a new opportunity to make sure that our program goals are realistic, that our programs and procedures are logical strategies for achieving those goals, and in measuring our performance, determining how effective all our hard work really is towards achieving those goals. Similarly, HUD's Logic Model forces us to look at the progression of determining community needs, developing appropriate programmatic models and output goals, and measurement of the outcomes of those activities.

Also, several new programs have been introduced recently that we should take a second look at, to see how they might fit with our current community improvement goals. DHCR's Main Street program is a good example, as the pioneer applicants for this funding are find-

ing that it can jumpstart a variety of projects that are important to the revitalization of the downtowns of our little villages and hamlets. At the same time, recent policy initiatives of the Housing Trust Fund Corporation have moved to encourage mixed income and mixed use developments using HTFC funding. The Governor's Office of Small Cities similarly is encouraging Main Street types of projects with Small Cities CDBG funding. Clearly, there is a bandwagon here waiting to be jumped upon- *IF* your communities' goals include Main Street type of revitalization work. The early days of a funding program always provide more opportunities for flexibility and creativity in program design. Now is the time to take advantage of this window of flexibility.

And a reminder- all levels of government and philanthropy are being called upon to be more accountable. The best offense is to plan accountability into your program design. And make sure that your funders understand fully what you are accomplishing. The CDBG experience in Washington was the perfect example of this. HUD hadn't tracked the program's accomplishments over the years, so when the administration questioned CDBG's usefulness, no one had hard facts to counter the administration's charges. However, the politicians in Congress *did* know how beneficial the program is, and fought back the administration's plans

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Rural Delivery

Rural Delivery is published by the New York State Rural Housing Coalition, Inc. a nonprofit membership organization. The Coalition is a statewide membership organization dedicated to strengthening and revitalizing rural New York by assisting housing and community development providers.

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Bits and Pieces...

HUD Encourages Early Registration At Grants.gov

New applicants for HUD funding in 2006 are encouraged to visit the Grants.gov website early. Potential applicants can register for electronic application submission through January 31st. HUD expects to issue the 2006 funding notices early in the year. For more information, contact the NOFA information center at HUD at (800) HUD-8929.

House Passes Brownfields Relief

On December 13th, the House of Representatives passed HR 280, a bill that eliminates the requirement that communities pledge their CDBG funding as collateral and apply for loan funding from HUD to qualify for brownfields assistance. This collateral requirement hindered many small communities from utilizing the brownfields program.

Finance Board Seeks Comments For AHP

Comments are due by April 27th to the Federal Housing Finance Board on a proposed rule that removes restrictions on and preferences for projects under the Federal Home Loan Bank Affordable Housing Program. The rule seeks to make it easier for project sponsors to understand requirements for housing projects vs. home ownership programs, among other changes.

To review the Federal Register notice, visit: www.regulations.gov/fdmspublic-rel11/ContentViewer?objectId=090000648010143f&contentType=html&disposition=inline.

Welcome New Member!

The Rural Housing Coalition is always pleased to welcome new members. This month, we are welcoming Nancy Berkowitz to membership. Nancy wears two hats- as the staff of the NYS Rural Advocates, and as a community development consultant. She can be reached at (518) 352-7787.

Federal and U.S. military employees can support the Rural Housing Coalition through the annual Combined Federal Campaign (CFC). If you are a federal government or military employee and would like to donate through the CFC, please enter CFC code #9614 on your pledge card during the next fund drive.

DHCR Announces Main St. Awards

On December 9th, Governor Pataki announced nearly \$8.7 million in grants through the State's Main Street Program, which is designed to stimulate downtown revitalization in communities by providing funding for building renovations, streetscape enhancements and downtown business or cultural anchors.

"New York's downtown business districts represent the lifeblood of our cities, towns and villages", Governor Pataki said. "These awards will provide much needed resources to assist the efforts of communities that have created a clear vision and commitment to investing resources to reinvigorate our Main Streets. The response to this program has been overwhelming and I want to congratulate the recipients for their vision and determination to enhance the lives of their residents and enable business to grow."

The New York Main Street Program, administered by the Division of Housing and Community Renewal and the Housing Trust Fund Corporation, was launched by the Governor last year. The program provides matching grants for facade and interior building renovations, streetscape enhancements, landscaping and signage and to install street furniture, and for communities to establish a business or cultural anchor in their downtown. For more information about the New York Main Street program, please contact the State Division of Housing and Community Renewal at (518) 474-9553 or visit the Main Street website at www.nymainstreet.org. The Main Street awardees are:

Cohoes Local Development Corporation, \$148,800
Albany County Rural Housing Alliance, Inc., \$200,000
Alfred Housing Committee, Inc., \$200,000
South Bronx Overall Economic Development Corp., \$195,000

Cayuga County Homsite Development Corp., \$200,000
Auburn Downtown Partnership, Inc., \$200,000
Chautauqua Home Rehabilitation and Improvement Corp., \$163,200
Elmira Downtown Development, Inc., \$200,000
Norwich Business Improvement District Management Association, Inc., \$200,000
Berkshire Taconic Community Foundation, Inc., \$179,264
Cortland Housing Assistance Council, Inc., \$200,000
Hancock Partners, Inc., \$200,000
Hamburg Development Corp., \$166,700
Buffalo Economic Renaissance Corporation, \$200,000
Lovejoy District Neighborhood Revitalization Services, Inc., \$200,000
Pride Of Ticonderoga, Inc., \$180,800
Batavia Business Improvement District Management Association, Inc., \$200,000
Adirondack Economic Development Corp., \$71,703
Neighbors of Watertown, Inc., \$200,000
Pratt Area Community Council, \$200,000
North East Area Development, Inc., \$200,000
Fairport Industrial Development Agency, \$195,000
Fortroyal Foundation, Inc., \$200,000
West Harlem Art Fund, Inc., \$120,000
Hope Community, Inc., \$200,000
Lumber City Development Corp., \$200,000
GroWest, Inc., \$200,000
Keep America Beautiful of Rome, NY, Inc. dba Rome Clean and Green, \$200,000
Downtown Committee of Syracuse, Inc., \$200,000

Southern Hills Preservation Corp., \$200,000
Downtown Canandaigua Business Management Association, Inc., \$200,000
Rural Housing Opportunities Corporation, \$50,000
Oswego City Revitalization Corp (OCRC), \$200,000
Fulton Community Revitalization Corporation, \$55,000
Rockaway Development & Revitalization Corp., \$200,000
Troy Local Development Corporation, \$200,000
Troy Architectural Program, Inc., \$200,000
Saratoga Economic Development Corp., \$200,000
Middleburgh Renaissance Council, \$200,000
Heuvelton Historical Association, \$200,000
Business Development Corporation for a Greater Massena (BDC), \$174,354
Steuben Churchpeople Against Poverty, Inc., \$200,000
Warren County LDC, \$200,000
Greater Greenwich Chamber of Commerce, Inc., \$200,000
Savannah Chamber of Commerce, \$187,986
Clyde Chamber of Commerce, \$200,000
Greater Warsaw Chamber Of Commerce, \$200,000

The total Main Street funding awarded in this latest round was \$8,687,807.

HUD Announces Funding for Homeless Programs

Nationwide thousands of local programs that house and serve homeless persons—from emergency shelters and transitional housing projects to permanent supportive housing programs—will receive \$1.33 billion in funding through grants announced 12/20 by the US Dept. of Housing and Urban Development. New York will receive a total of \$142,788,620.

In the past five years, HUD has awarded \$6 billion in funding to state and local communities to support the housing and service needs of homeless persons and families. HUD's funding is provided in two ways:

HUD's *Continuum of Care* programs provide permanent and transitional housing to homeless persons. In addition, Continuum grants fund important services including job training, health care, mental health counseling, substance abuse treatment and child care. (\$127,500,000 for all awardees in New York State)

Emergency Shelter Grants *provides funds for homeless shelters, assists in the operation of local shelters and funds related social service and homeless prevention programs.* (\$15,288,530 for New York State)

Continuum of Care grants are awarded competitively to local pro-

grams to meet the needs of their homeless clients. Continuum grants fund a wide variety of programs—from street outreach and assessment programs to transitional and permanent housing for homeless persons and families. About half of all Continuum funding awarded will support new and existing programs that help to pay rent and provide permanent housing for disabled homeless individuals and their. For a more detailed local summary of the funding announced, visit www.hud.gov.

Emergency Shelter Grants are allocated based on a formula to state and local governments to create, improve and operate emergency shelters for homeless persons. These funds may also support essential services including job training, health care, drug/alcohol treatment, childcare and homelessness prevention activities. By helping to support emergency shelter, transitional housing and needed support services, Emergency Shelter Grants are designed to move homeless persons away from a life on the street toward permanent housing.

Highlights of this year's HUD Homeless Assistance awards:

* Nearly 5,000 local programs nationwide will receive more than \$133 billion.

* 1,318 of the project awards being announced today target individuals experiencing chronic homelessness. Total funding to these projects will exceed \$379 million, a commitment that directly supports the national goal of ending chronic homelessness.

* Nearly \$600 million is being awarded to projects that provide permanent housing solutions for homeless persons.

* More than 3,000 local projects that serve mothers and their children will receive \$739 million.

* 658 programs that primarily serve victims of domestic violence will receive nearly \$125 million.

* \$53.6 million is being awarded to 226 projects that primarily target homeless veterans among those they serve.

* Nearly 1,600 of the projects funded are dedicated to providing housing and support services to severely mentally ill clients. These persons are at high risk of experiencing long-term or chronic homelessness.

* 206 million will support faith-based organizations to house and serve homeless persons and families.

* Nearly \$419 million will support 1,604 local programs that primarily help homeless individuals with substance abuse problems.

For more information on the implementation of Continuum of Care programs in your community, call John Grover at (518) 458-8696

RHC Provides TA to Homeless Grantees

The Rural Housing Coalition, through its contract with HUD, provided crucial technical assistance (TA) to several awardees in the recent round of HUD grants for homeless programs. Under this contract the Coalition provides a combination of direct assistance along with very substantial help from its TA partners, Cares, Inc. and the Supportive Housing Network of New York. This can entail assisting in the development of a local Continuum of Care (CofC) organization, the development

of a CofC planning document and guidance through the technical aspects of the HUD application process. The Continuum of Care grants are awarded competitively to local programs to meet the needs of their homeless clients.

New CofC proposals funded this round include: \$226,481 for the Columbia and Greene County Consortium, \$617,460 for the Jefferson, Lewis and St. Lawrence County Consortium and \$590,401 for the Saratoga, Warren and Washington County Consortium.

CRA Exams

The State Banking Department will be holding First Quarter CRA exams for the following banks: Chemung Canal Trust Co.; Tioga State Bank; US Trust; Capital Bank & Trust; Genesee Regional Bank; North Fork Bank; Community Mutual Savings Bank; United Orient Bank; and Community Capital Bank. Comments on bank CRA performance should be directed to Edward Kramer, Deputy Superintendent of Banks by email to CRA@Banking.State.NY.US.

CDFI Fund Soliciting Public Comments On NMTC Allocation

Application

As required by the Paperwork Reduction Act of 1995, the CDFI Fund transmitted to the Federal Register on December 21st a document soliciting public comments on the New Markets Tax Credit (NMTC) Program Allocation Application. Comments are invited on: (a) whether the collection of information is necessary for the proper performance of the functions of the agency, including whether the information shall have practical utility; (b) the accuracy of the agency's estimate of the burden of the collection of information; (c) ways to enhance the quality, utility, and clarity of the information to be collected; (d) ways to minimize the burden of the collection of information on respondents, including through the use of technology; and (e) estimates of capital or start-up costs and costs of operation, maintenance, and purchase of services required to provide information. Comments are due on or about February 20th. For more information, see the Notice at www.cdfifund.gov/docs/2005/nmtc/applicationCommentsRequest.pdf.

The New York State Rural Housing Coalition is happy to be able to provide help wanted advertising opportunities for our members and non-profit community development agencies. Ad copy must be provided in Microsoft Word format, and may be transmitted by email to rhc@ruralhousing.org. Ad copy must comply with federal and state equal opportunity requirements to be published, and must be received by the 25th of the month to ensure placement in the succeeding issue of *Rural Delivery*. Ads provided in this fashion will also be posted in the Career Opportunities page of the Coalition's website, unless a request is specifically made not to place the advertisement on-line.

Career Opportunities

Executive Director

CAPCO, Cortland County's Community Action agency is seeking an Executive Director. Master's degree in Human Services, Business or Government Administration or related field preferred. Bachelor's degree required. Personnel and fiscal management required with demonstrated ability to conceive, plan, execute and manage outcome based programs to meet various socio-economic needs. Excellent verbal and written communication skills

required, experience in grant writing helpful. Must be proficient in the use of current computer technology. Valid NYS driver's license and acceptable driving record necessary. Salary range \$58,000 to \$70,000, commensurate with education and experience. All resumes must be received no later than November 15, 2005. Please send resumes to the attention of: Search Committee, CAPCO, 32 North Main Street, Cortland, NY 13045. AA/EOE.

Housing Advocacy Director

Association for Neighborhood & Housing Development Housing Advocacy Director- ANHD The Association for Neighborhood & Housing Development seeks a capable, self-directed, highly productive person to oversee advocacy campaigns for progressive housing policies and programs serving NYC neighborhoods. ANHD is a member organization of 90 NYC community-based housing organizations. Director works with member committees to craft and promote housing advocacy initiatives on community and citywide level. Successful candidate will have

several years direct experience. Some background in affordable housing development and preservation required. Must be knowledgeable about NYC budget and legislative processes and NYC housing programs. Knowledge of NYC neighborhoods and neighborhood groups helpful. Extremely strong interpersonal skills, written and verbal communication skills, willing to work evenings. Salary up to \$55,000, great benefits. Women and persons of color are encouraged to apply. Fax resume, cover letter, and a writing sample to Irene Baldwin (212) 747-1114 or irene.b@anhd.org. EOE

Community Development Professional/ Researcher

The successful candidate will work with Branch management to help shape and implement a strategy focused on the economic and community development needs of upstate New York with particular emphasis on low- and moderate-income (LMI) populations. The candidate will draw on his/her experience with LMI communities to successfully identify issues and draw valuable insights that are rigorously researched, balanced in perspectives, and of practical value to community development

practitioners and policy makers. The research will be printed in Federal Reserve publications and presented at professional meetings and conferences. Strong writing and presentation skills are required.

For immediate consideration, please contact or send resume to Reggie Melson, Buffalo Branch, Federal Reserve Bank of New York, 40 Fountain Plaza, Suite 650, Buffalo, NY 14202. Or email: reggie.melson@ny.frb.org.

EOE

NCRC Seeks Comments on New CRA Test Questions

On November 10th, thirteen new questions with answers were proposed for the existing “Interagency Questions and Answers” document that provides guidance regarding Community Reinvestment tests to Community Reinvestment Act (CRA) examiners, banks, and the public. The questions and answers were issued by the Office of the Comptroller of the Currency, the Federal Reserve Board, and the Federal Deposit Insurance Corporation. Many of the proposed questions and answers relate to an August 2 final rule revising the term “community development” to include activities that “revitalize and stabilize nonmetropolitan, middle income areas which are distressed or underserved.”

The National Community Reinvestment Coalition (NCRC) is asking groups to submit comments by the January 9th due date. There are a number of features in the proposed Q&A that NCRC endorses, including:

- Points for banks financing community development in areas impacted by disasters up to one year after the expiration of federal or state disaster designation.
- Extra points for community development activities responsive to the needs of low and moderate income households impacted by natural disaster.
- Questions aimed at identifying services important to low income people such as low-cost checking accounts, electronic transfers, and remittances, which are alternatives to payday loans. NCRC urges the agencies to provide CRA points for low-cost banking services, and penalties for banks with abu-

sive practices, such as “bounce protection” that has wealth stripping features.

- The question that reiterates that mid-sized banks (those with assets between \$250 million and \$1 billion) must offer community development loans, investments, and services. NCRC asks that the Q&A state that qualitative factors will not be used by examiners to excuse low levels of community development lending, investments, or service.

NCRC also asks the agencies to clarify the CRA exam criteria for mid-sized banks that assesses their provision of services through branches and other facilities, by ensuring the criteria includes an examination of the number and percent of branches in low and moderate income communities. NCRC further asks that a question be added indicating that a bank will automatically undergo a fair lending exam to test for compliance with federal anti-predatory and anti-discrimination laws when the bank or one of its affiliates makes a high concentration of subprime loans to minorities, the elderly, women, low income borrowers, or communities recovering from natural disasters or experiencing shortages of credit.

Finally, NCRC opposes the question that awards CRA points for financing middle and upper income housing in distressed rural middle income census tracts. Instead, banks should get CRA points for mixed-income housing.

The proposed questions are available at www.hudclips.org, “Federal Register Documents Seeking Public Comment,” item 18. Comments are due January 9th. A sample comment letter is available at: www.nlihc.org/news/122305-2.html.

CDFI NOFA Issued

February 13th is the deadline for the next round of CDFI funding. The NOFA was published in the Federal Register on December 13th. The application deadline for potential CDFI’s is March 1st.

The Federal Register notice included an extension of the September 9, 2005 application deadline for the Bank Enterprise Award (BEA) program.

For more information, visit www.cdfifund.gov.

Time For A Fresh Start

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for eliminating CDBG. We, as advocates for our communities, and the housing and community development programs we provide, need to move forward by keeping in touch with our legislators so that they can immediately respond to any challenges or funding cuts proposed for the programs we rely upon. We can not assume that they automatically know about our successes. We have to be proactive about telling them all that we accomplish in our work. And we need to build the time for that into our schedules.

In February, the NYS Rural Advocates will once again hold the annual Legislative Conference in Albany. This is a great opportunity to visit with your legislators and share your message of accomplishment. For newbies to advocacy, it’s also a great opportunity to learn the ropes of meeting with your legislators, as there will be plenty of your peers available to help you meet with your representatives and share your stories. For info on the February 13th Legislative Conference, contact Nancy Berkowitz at nbek@frontiernet.net.

Save The Dates! The Rural Housing Coalition will be sponsoring special trainings for Rural Preservation Companies on January 17th in Cortland, January 18th in Watertown, January 24th in Elizabethtown, January 31st in Albany, February 1st in Rochester, and February 2nd in Perry. Mark your calendar and plan to attend the session in your region! Registration information will be in the mail shortly.

Planning Grants Available

Planning for future demographic change — Creativity and innovation in the face of demographic change can insure that our communities will be welcoming, attractive, liveable, and dynamic places for all residents to live, grow, work, and age.

The profile of our communities is changing dramatically. The baby boomers are aging, we have a significant influx of foreign immigrants, ethnic populations are increasing, regional characteristics are shifting because of robust migration patterns, the number and types of individuals with disabilities are on the rise, and the number of non-traditional households is growing. These changes will have a major impact on individuals, families, and communities.

The Grantmakers Alliance of Northeastern New York and the New York State Office for the Aging have formed a partnership to encourage communities to plan projects and activities that will capitalize on the opportunities and meet the challenges inherent in these changes.

Under an initiative called “*Making Connections . . . to Build Strong Communities*,” the partnership is offering planning grants of up to \$5,000 to community groups in Saratoga, Schenectady, Rensselaer, and Albany Counties. Grant applicants are asked to form non-traditional community collaborative teams to take a cross-generational, cross-cultural, interdisciplinary approach to planning for the issues and opportunities facing their communities. Grants will cover a six-month planning period during which applicants will design a community-building project or activity. Completed applications are due on March 1, 2006.

A copy of the initiative’s application form is available on the Community Foundation for the Capital District’s Web site at www.cfc.org. For more information on the initiative or a hard copy of the application form, contact Vera Prosper, New York State Office for the Aging, at (518) 474-4382, or Bill Dessingue, Charitable Leadership Foundation, at (518) 877-6701.

ICF Study Focuses On Elderly Housing Demand

A recently-published study by Kevin Blake and Aleksandra Simic of ICF Consulting gives a picture of what the demand for elderly housing will be over the next 25 years. *Elderly Housing Consumption: Historical Patterns and Projected Trends* calls for future housing policy that is responsive to the supply of affordable and suitable homes for the senior population, as well as the need for services in the home.

The study looks back at housing changes for elderly Americans over the past 18 years. During that period, the elderly have become more likely to own their own homes. This indicates an increasing preference to ‘age in place’.

Slightly less than 3% of the seniors over the age of 75 receive some form of housing assistance, according to the study.

The authors note that, with the first Baby Boomers turning 60 next year, future population growth will take place in the older cohort. During the next 25 years, the number of households headed by individuals 62 years of age or older will increase by nearly 24 million nationally. If those seniors needing housing subsidy remain a constant proportion, the number of available subsidies will need to increase to meet the demand. The study may be downloaded at www.huduser.org/datasets/ahs/Elderly_Housing_Consumption.pdf.

2006 DHCR Seminar Series Scheduled

Lead Based Paint: A Primer Coat. DHCR and HTFC are pleased to announce the first presentation in the 2006 seminar series on affordable housing and community development. Any pre-1978 residential property that is acquired, rehabilitated or assisted with HUD funding (such as HOME and CDBG) is subject to HUD Lead-Based Paint rules. The rules have been in effect since 2001. If you haven’t been trained before, or even if you have but have forgotten some of the details over the years, then this seminar will take you back to the basics. Topics will include the LBP rules applicable to acquisition, rehabilitation and rental assistance. It will explain who can do what activities, and give advice on how to manage and oversee the process. It will also provide you with guidance and checklists on how to document your compliance. Monte Franke of Franke Consulting will deliver the seminar. He has worked for the HUD Office of Healthy Homes and LBP Hazards, and has delivered LBP training nationwide. The trainings will be held on :

January 04, 2006, Yonkers Public Library/Riverfront Library, The Community Room, 2nd Floor, One Larkin Center, Yonkers, NY

January 05, 2006, Empire State Plaza Convention Center, Meeting Room #7 Albany, NY

January 18, 2006, Holiday Inn 601 Dingens Street, *Enter at Max’s Restaurant*, Buffalo, NY

January 19, 2006, HUD Storefront, 128 E. Jefferson St., Syracuse, NY

Seminars are from 9:00 AM- 4:00 PM. Sign-in begins at 8:30 AM. Lunch is on your own. For more information, visit the DHCR website at www.dhcr.state.ny.us/ocd/apps/seminar/seminar_intro_2006.asp.

Rural Housing Service Urged To Make Sect. 542 Program Effective

On December 21st, 15 national and state advocacy organizations, jointly sent a letter to Russell Davis, Housing Programs Administrator at the Rural Housing Service (RHS) of USDA, offering suggestions to RHS as the agency begins to design a new one-year voucher program established by the FY06 appropriations act. The previously unfunded Section 542 rural voucher program now has \$16 million to protect tenants in properties whose Section 515 loans are prepaid.

Advocates noted a number of areas in which HUD's enhanced voucher experience could serve as a template for designing the RHS 542 voucher program:

- RHS should not issue vouchers through a NOFA, because there is usually a disconnect between the tim-

ing of a NOFA and the timing of an owner's decision to prepay a 515 loan. Instead RHS should adapt HUD's enhanced voucher process by issuing the appropriate number of vouchers to a PHA when a prepayment is pending.

- PHAs should be used to establish comparable market rents because they have the necessary experience to ensure that rents encourage prepaying owners to accept tenant protection vouchers.

- A tenant "right to remain" restrictive covenant should be filed against a property so that owners will be required to accept vouchers as a condition of prepayment.

- When tenants no longer need or qualify for enhanced vouchers, the vouchers should remain with the local PHA and not revert to a national pool.

Advocates also said that in order for tenants to be able to move anywhere in the nation, RHS should adapt HUD's Section 8 portability features while avoiding some of HUD's features that inhibit portability.

Other suggestions in the letter include urging RHS to target vouchers to prepayments in which tenants are unprotected, such as when an owner is in default on the mortgage, submits full payment to RHS, and thereby exits the 515 program with no restrictions or protections for tenants. The letter suggested that RHS consider potential HUD/RHS inter-departmental problems and address them in a Memorandum of Understanding. A copy of the letter can be found at www.nlihc.org/news/122305.html.

Visit our website at www.ruralhousing.org
