

ROI: Return on Investment from PHADA Membership

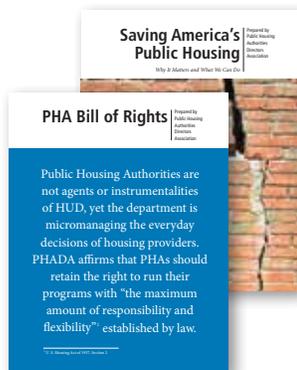
PHADA membership yields an exceptional “return on investment” (ROI) that is measured in both tangible and intangible benefits. This ROI makes PHADA membership one of the most cost-effective decisions you can make for yourself and your housing authority.

Some of the many benefits of PHADA membership include: unlimited access to the PHADA website, biweekly subscription to the Association’s informative newsletter, the *Advocate*, topic-specific issue briefs and position papers, discounts on conference registration and PHADA publications, essential and timely professional development programs, and insights and advocacy from top policy analysts on important legislative and regulatory matters.



Now More Than Ever, PHADA Needs the Broad Base Support of All Housing Agencies’ Participation, Which Enables PHADA to:

- ✔ **Fight** hard for adequate Operating and Capital Funds and Housing Choice Voucher (HCV) assistance and Administrative fees, as well as transparent eligibility determinations for these funds;
- ✔ **Push** for common-sense legislation to allow HUD to approve HAs’ use of part of their Housing Assistance Payments (HAP) reserves from prior years, in order to provide them with adequate fees to lease over 100,000 low-income households who are going unserved with funds that are otherwise available;
- ✔ **Innovate** new approaches for HAs to address budget challenges including developing proposals such as the concept of “proportionality” to give HAs more flexibility when funds are inadequate. In addition, PHADA wrote the groundbreaking, *PHA Bill of Rights*, declaring that HAs should be treated as true partners rather than as subservient to HUD;
- ✔ **Testify** on appropriation needs, authorizing reform legislation, and need for regulatory relief. The association offered almost 20 specific proposals to the House’s Subcommittee on Housing and Insurance leadership. PHADA’s Executive Director participated in a White House forum and expressed the association’s concerns about HUD’s proposed non-smoking regulation;



- ✔ **Propose** solutions to help HAs cope in the constrained budget environment such as expanding the Moving to Work (MTW) program and the Small Housing Authority Reform Proposal (SHARP). On MTW, PHADA collaborated with Senator Susan Collins (R-ME) to help secure a major MTW expansion. PHADA also worked with the original sponsor of the Tenant Income Verification Relief Act, which was signed into law in 2016. That provision allows HAs to conduct triennial recertifications in cases where at least 90 percent of tenant income is fixed. The association also proposed several of the provisions that were ultimately adopted as part of HUD’s streamlining regulation;



During a briefing on Capitol Hill for the Small Housing Reform Proposal (SHARP) legislation, PHADA President Nancy Walker met with Rep. Steven Palazzo (R-MS) to discuss budgetary and regulatory problems troubling the program.

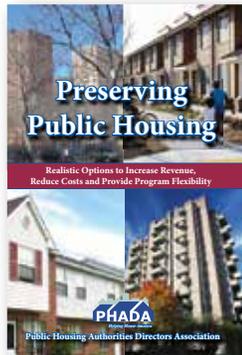
- ✔ **Oppose** unreasonable notices such as the HUD General Counsel’s guidance on the use criminal records, which conflicts with HUD’s own regulations. PHADA’s action helped convince the House of Representatives to initiate an inquiry into this conflicting guidance. PHADA has also opposed HUD’s backtracking on asset management and the “refederalization” of central office cost center, providing feedback and suggestions to make sure rules are fair and workable;

“Once again, PHADA is proving that it is staying on the forefront of issues that really matter to agencies of all sizes and makeups. I am so proud to be a member of this great group of folks!”

—Brian Harris, Executive Director, Martin Housing Authority & Galloway Housing Authority and PHADA Vice President for Membership

✔ **Educate** Congress and HUD about disturbing trends that show damage to Voucher and Public Housing program participants, applicants, and HAs resulting from severe imbalances in downward prorations in funding and over-burdensome statutes and regulations. PHADA has informed Congress that the high costs of various “mobility” initiatives threaten other affordable housing programs and raise questions about the extent to which they provide real benefits to residents;

✔ **Suggest** new ways to control costs and increase HA revenues, such as higher minimum rents (with hardship provisions) and other changes in the ways utilities and rents are calculated (see www.phada.org/pdf/Preserving-PublicHousingBooklet.pdf);



✔ **Lead** efforts to oppose the three-tiered salary cap scheme for HA employees. PHADA initiated a contract with an outside expert to conduct a thorough review of ED salaries, comparing them to other industries. The association has also led industry efforts on HUD’s plan to replace Housing Quality Standards with a new unworkable inspection protocol (UPCS-V). Following discussions with PHADA, HUD agreed to consider a reasoned approach to a regular evaluation of the UPCS-V demonstration as it progresses to ensure that outcomes are valid and objective. The Department has become much more transparent and open to industry feedback, including quarterly



PHADA Trustees Miguel Del Campillo (Miami Beach, FL) and Vivian Bryant (Orlando, FL) talk with Rep. Mario Diaz Balart (center), Chairman of the House T-HUD Appropriations Subcommittee. The Floridians expressed their appreciation for the Chairman’s efforts on the Moving to Work expansion legislation.

conference calls to provide updates, and has begun to take a more carefully considered approach to the roll out of the demonstration;

✔ **Help** members develop comments to HUD and Congress. For example, PHADA has provided detailed comment templates for members to use in communications on HUD’s Assessment of Fair Housing Tool, proposed HCV admin fee formula changes, and the lead-based paint rule;

✔ **Advocate** for deregulation and more flexibility for HAs, leading a joint industry group appeal to Secretary Carson to rescind regulations and guidance that create barriers to agencies, like the proposed demolition/disposition policy. In addition, PHADA suggested a moratorium on all new HUD rules and reporting requirements including the Department’s costly and time-consuming Physical Needs Assessment (PNA). On the statutory side, PHADA helped secure legislative language that prevents appropriated funds from being used by HUD to require or enforce the PNA;

✔ **Protect** HAs by pressing HUD to publish information on operating reserves, demonstrating the billions of reserve funds that HAs need to cover future costs. This will help protect those funds from possible recapture in the future;

✔ **Contest** existential threats including the proposed “regionalization” of the HCV and public housing programs, which would eliminate many HAs and lead to diminishing housing assistance to the communities they serve;

✔ **Prevail** in a lawsuit against HUD, in which PHADA took a lead role, for its unfair and illegal recapture of operating reserves. As a result, hundreds of agencies who signed on to the lawsuit will see a reinstatement of those funds. PHADA joined two amicus briefs to the U.S. Supreme Court, and successfully recruited others to sign on, making a legal argument that was designed to protect HAs from erroneous discrimination claims;

✔ **Submit** detailed comments suggesting improvements to the far reaching Affirmatively Furthering Fair Housing (AFFH) proposed rule and tool that may pose legal and administrative challenges for housing authorities. PHADA has also filed extensive comments regarding HUD’s HCV Administrative Fee Study, proposed FMRs, non-smoking regulation, Small Area FMRs, consortia rule, and HUD’s proposed streamlining, Section 3, VAWA and demolition-disposition rules.



The Issue Brief on the underfunding of Section 8 administrative fees presented PHADA’s cost neutral proposal to improve lease-up of households to help address this growing voucher leasing crisis.

PHADA will continue to vigorously pursue housing authority funding needs and deregulation. Thank you for your support!