

OCTOBER 2017

## Message from the Executive Director



Dear Members,

As the *CARH News* went to print, the House Ways and Means Committee unveiled the long-awaited tax reform bill, [H.R. 1, Tax Cuts and](#)

[Jobs Act](#). It is clear, if implemented as written, the bill would materially change affordable housing transactions as they have been structured for many years. While Low-Income Housing Tax Credits (Housing Credits) would be retained, the value of the credits would decrease due to the proposed lowering of the corporate tax rate. The corporate tax rate is to be permanently lowered to 20% with no offsetting increase in credit amounts or rates for Housing Credits. Private activity bonds used for affordable housing would be eliminated. This elimination would have a devastating impact on rural housing preservation transactions. This change would reduce production by as much as 50%, and together with the lower corporate tax rate, reduce production by approximately 65%. The New Markets Tax Credit is also slated for termination as are Historic Tax Credits.

The schedule laid out by the leadership in the United States House of Representatives is to have the tax reform bill voted by the full House by Thanksgiving. The Senate Finance Committee will likely introduce its tax legislation the week of November 13<sup>th</sup>. This is a very ambitious schedule and it is quite possible dates will slip, particularly if Members express concerns, reservations, or opposition to the House bill.

It is vital that every CARH member contact your Representatives and Senators to voice your concern over the proposed tax reform bill as it currently stands. **Your message should be one that will show the negative impact of changes to your portfolio and to rural**

**housing across the country. Specific examples are important especially when legislation is being considered that will negatively impact your business as well as the residents who live in your affordable apartment communities. Social media (i.e., Twitter and Facebook) is also a very effective way to deliver your message. To contact your Representative, [click here](#). To contact your Senator, [click here](#). (The contact links also include links to your members of Congress social media pages.)**

While CARH and our legislative team will be focusing on garnering support for changes to the tax reform proposal as currently written by the House, we are also finalizing plans for the 2018 Midyear Meeting, to be held January 22-24, 2018, in Napa, California. While our thoughts and prayers are with those who've been impacted by the recent historic fires, we're pleased to tell you that the Westin Verasa Napa, our meeting hotel, was not located in the immediate area of the fires. You can read more about the upcoming meeting in the article on page 4. On page 6, you will find information on how you can help fire victims in the Napa region. Beginning on page 19, CARH provides a comprehensive update on the ongoing relief efforts in response to Hurricanes Harvey, Irma, and Maria.

Finally, it's time to renew your CARH membership! We need each and every one of our members to remain a leader in our industry. We also ask you to encourage your colleagues to join CARH. A membership application can be found on page 17, as well as on CARH's website, [www.carh.org](http://www.carh.org).

Sincerely,

Colleen M. Fisher  
Executive Director, CARH

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### Tax Credit Percentages

Up to the moment tax credit percentages  
always available at [www.carh.org](http://www.carh.org)

2017	4% Credit	9% Credit
Nov	3.23	7.53
Oct	3.21	7.50
Sept	3.22	7.52
Aug	3.22	7.52
July	3.22	7.52

## Dual Signatures: An Idea Whose Time Has Passed

By Richard Michael Price, Esq. and Nathaniel Cushman, Esq., Nixon Peabody LLP



Richard Price



Nathaniel Cushman

CARH staff have again been looking at an issue that has vexed many owners of Rural Development (RD) rural rental multifamily properties—dual signatures. The dual signature requirement dates back many years, and has been an administrative burden with questionable benefit.

Dual signatures, or more correctly called countersignatures, seems to have its origins as early as 1985. At that time, the USDA OIG issued a national audit of county office operations and found an issue of program assistance being provided to close relatives of Farmers Home Administration (FmHA) employees and a related lack of FmHA oversight control. FmHA is the predecessor agency to the Rural Housing Service, which in turn is part of RD. The audit also addressed related areas of FmHA oversight vulnerability.

In 1993, USDA revised its regulations to require that countersignature authority is provided only to FmHA servicing officials unrelated to program applicants. This was accomplished by adding the regulation at 7 CFR Section 1900.156, among other provisions.

More broadly, the July 30, 1993 *Federal Register* contained a revision to the old 7 CFR Part 1930 that required countersigned, supervisory accounts for reserve funds. Based on our old records, it seemed that at least one version required that as of July 26, 1994 reserve funds had to be placed in a double-signature supervised account. RD Instruction 1930-C, Exhibit B, XIII B 2 c (5). The old Part 1930 (also known as Instruction 1930) at one point incorporated the Part 1902 regulations (also known as Instruction 1902). The Part 1902 regulations were fully incorporated in the 2005 revision to those regulations.

The countersignature requirement is embodied in the form RD 402-1 Deposit Agreement. The form is required through the Part 1902 regulations which bring in the RD 402 forms. The 402-1 form seems to have been originally intended for the Farm Service Agency and for a different purpose, and it appears to bring in concepts that are incongruous to rural rental housing requirements in the Section 514/515 loan programs. There is language in the 402 form that states that RD can call and obtain funds in the account regardless of purpose. However, that violates the Part 1902 regulations and contradicts the purpose and nature of the reserve account. The funds in the reserve account are to be used for long term capital needs, and when other funds are insufficient, pay loan obligations, repair costs, and return on investment.

RD staff are often resistant to use the RD 402-1 form as it often means the RD staff has to provide their own social security numbers to open the supervised bank account, with that RD staff person acting as the countersignatory. When the RD signatory retires this creates additional work to find another RD staff person and process everything again.

In addition, CARH's members report that most banks refuse to establish an account using the standard Agency depository form. This forces members out of the typical federal banking system, and many report only being able

to find isolated, small institutions willing to work with the RD form. Some banks have made it known to our members that, although they will establish a reserve account and sign the Agency depository form, they do not have processes in place for administering the dual signature requirement and therefore cannot assure our members that the dual signature requirement will be followed by the bank. The dual signature requirement therefore limits our members' choices of financial institution while failing to deliver on the Agency's goals for the accounts. Independent research on the internet readily reveals that many industries are coming to terms with the fact that banks typically no longer have a dual signature process. Dual signatures are still used by some companies, but solely as an internal cash control procedure, having nothing to do with banks or other parties.

The countersignature requirement also makes withdrawals from reserve accounts more cumbersome. Withdrawals are processed using the RD 3560-12 form. Participants and Agency staff must duplicate work for each use of reserve funds in the countersigned account. First, the program participant is required to submit the RD 3560-12 form prior to engaging work or ordering products. These forms are supposed to be processed in a timely manner. However, due to staffing issues and other priorities, participants routinely wait weeks for RD processing of this first step. Second, the participant is required to do the work necessary to engage the work or order the product, and then send in the RD 3560-12 a second time to obtain Agency signature, requiring a duplicate process of RD review that again may take weeks. The administration of dual signature accounts therefore imposes an unnecessary burden on program participants and Agency staff, and can unnecessarily delay repairs and improvements at RD properties. By requiring up front approval and then after the fact review, RD staff is processing and reviewing the same financial transactions twice.

The Agency's program goals can be achieved through less burdensome means. The Agency can adequately oversee an account administered through modern banking practices using electronic withdrawals. Further, the Agency has the ability for adequate oversight through other standard processes. Each multifamily property undergoes an annual budget process and a quarterly or annual reporting process. Instead of undergoing double processing for every reserve withdrawal, the Agency can rely on its review of reserve withdrawals during these regular processes.

If the countersignature reserve requirement was eliminated, the Agency could review reserve account withdrawals once rather than twice, effectively reducing half of the regulatory and oversight. This would be similar to the process used by the U.S. Department of Housing and Urban Development (HUD) in many of its multifamily programs. In those programs, HUD does not require a dual signature on regulated reserve accounts. Instead, HUD requires program participants to obtain HUD approval for reserve account withdrawals on its Form 9250. Once approval has been obtained, program participants can make the approved withdrawal, and HUD then confirms proper practice through an annual audit and periodic inspections. HUD still is able to oversee participants' use of reserve accounts and to identify any improper reserve withdrawals within an appropriate time period. This process works well in HUD programs and, if applied to Rural Development programs, would significantly reduce administrative burden.

Furthermore, the countersignature reserve account creates confusion at RD. Some RD offices confuse this requirement and without any regulatory authority extend it to all accounts, not just reserve accounts. This is an abuse of the forms, regulations and procedures, with no conceivable benefit, and that serves only to create dramatically more processing steps for participants and Agency staff alike.

CARH has raised the problems with the countersignature process informally with RD. Currently, CARH is providing formal comments in response to a September 20, 2017 *Federal Register* (82 Fed. Reg. 181, 43933) notice for the continued use of the 402-1 form. Comments are due November 20<sup>th</sup>. Federal agencies are required to periodically renew officially produced forms through notice to the public and opportunity to comment. Normally, this is a pretty noncontroversial process. In this instance, though, the process has created so much difficulty for owners and managers that CARH is commenting and objecting to the forms used.

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## Changes at Rural Development— Multi-Family Housing

Effective November 12th, Bryan Hooper will be transitioning to a new position within the United States Department of Agriculture (USDA) Rural Development (RD). Bryan will become the Deputy Administrator for Business Programs within the Rural Business and Cooperative Service. Joyce Allen, the current Deputy Administrator for Single Family Housing, will be succeeding Bryan as the Deputy Administrator for Multi-Family Housing. Joyce brings a wealth of multi-family experience, both from RD and HUD. Joyce joined USDA in 1991, as an Assistant County Supervisor for the Farmer's Home Administration, (the predecessor agency of RD) in a county office in Berlin, New Jersey. She accepted an assignment in the national RD office in 1994, where she developed policy and regulations for the Section 538 Guaranteed Rural Rental Housing Program. Joyce has also worked at HUD where she served as the Director of Multifamily Housing Development and oversaw the FHA multifamily mortgage insurance programs. CARH wishes Bryan the best in his new job at RD. We thank Bryan for his willingness to always attend CARH's national meetings as well as CARH's board of director meetings. CARH looks forward to working again with Joyce in her new position.



*Joyce Allen*

## Perdue Announces Farm Service Agency and Rural Development State Directors

On November 3, 2017, U.S. Secretary of Agriculture Sonny Perdue announced a slate of Farm Service Agency (FSA) and Rural Development (RD) State Directors, all serving as appointees of President Donald J. Trump. FSA State Directors help implement U.S. Department of Agriculture (USDA) policies in planning, organizing, and administering FSA programs in their respective states. They are also responsible for running the day-to-day activities of the state FSA office. Similarly, RD State Directors work to help improve the economy and quality of life in rural America. "These state directors will help ensure that USDA is offering the best customer service to our farmers, ranchers, foresters, and agricultural producers across the country," Secretary Perdue said. "FSA and RD both play a critical role in helping the people of agriculture, and are able to connect with people in their home states. They are the initial points of contact for millions of our USDA customers. Our goal is to help rural America prosper, and these state leaders will be of great assistance in that task." To review the newly announced state directors, [click here](#).

*Reprinted from [www.usda.gov](http://www.usda.gov).*

## Apply by January 1 to Become a CARH Rural Housing Designation Holder *Choose from Executive, Professional or Maintenance Designations*

*By Tamara Schultz, Membership Manager, CARH*

CARH offers professional designations to its members, which are designed to elevate professional standards, enhance individual performance and recognize those executives, managers and maintenance personnel in the rural housing industry who demonstrate the highest level of professionalism, ethics, dedication and expertise. The designations are Rural and Affordable Housing Executive (RAHE), Rural and

Affordable Housing Professional (RAHP) and Rural and Affordable Housing Maintenance Professional (RAHMP).

Requirements and applications may be found in the Education section of the CARH website, or by [clicking here](#).

The Certification Board of Review will meet at the CARH Midyear Meeting on January 22-24, 2018. Those wishing to obtain a RAHE, RAHP or RAHMP designation for the first time should provide a completed application package to the national CARH office **by January 1, 2018**, in order to be considered at the Midyear Meeting. The Board of Review will not meet again until CARH's Annual Meeting & Legislative Conference in June 2018.

*Please contact the CARH national office at (703) 837-9001 or [carh@carh.org](mailto:carh@carh.org) if you have any questions.*

# CARH 2018 Midyear Meeting *Navigating the Present and Shaping Our Future*

By Colleen Fisher, Executive Director, CARH

CARH will host the 2018 Midyear Meeting at The Westin Verasa Napa Hotel in Napa Valley, California, on January 22-24, 2018! While devastating wild fires have recently engulfed the Napa Valley and Sonoma regions, the site of the CARH meeting is not in the area impacted by the fires. The hotel has remained open, fully functioning and has been housing fire evacuees. Officials in the Napa area are confident that the entire region will be open for business by the time of the Midyear Meeting. Our thoughts and prayers are with those who've been impacted by these historic fires. You will find information on how to help those in need following this article.

Please plan now to attend this critical meeting. Make your hotel reservation and complete your registration today! CARH is pleased to offer a special group hotel rate. Please call the Westin Verasa Napa directly at 888-627-7169 to secure the CARH meeting rate of \$219 per night for a king room (\$249 per night on Friday/Saturday). Be sure to tell them you're part of the "CARH Midyear Meeting." You may also reserve your room online by [clicking here](#). Reservations must be made by **December 20, 2017**, in order to receive the discounted hotel room meeting rate. There are a limited number of rooms under the CARH room block, so make your reservations early!

We are also offering discounted registration until December 1, 2017. All registration and pricing information is available by [clicking here](#) for the registration form, or visiting [www.carh.org](http://www.carh.org). Reserve your space today simply by submitting your completed registration form. Don't forget the 2018 meeting will begin on **Monday, January 22 and end on Wednesday, January 24, 2018!**

The CARH Midyear Meeting is widely considered to be the premier affordable rural housing conference in the United States. Leading industry experts and senior-level government officials will present the latest information on regulations, pending legislation, and trends that impact your business. Be the first to hear from CARH's Washington experts on what to expect in 2018 and beyond on a variety of legislative issues, as well as how Congress and the Administration are impacting the affordable rural housing industry. Attendees will receive up-to-date information on a variety of housing programs and initiatives, including proposed enhancements to the Housing Credit and Bond programs. Special social activities will allow you time to relax and network with your industry colleagues.



CARH will present the prestigious Harry L. Tomlinson, State Affiliated Association of the Year, and Member of the Year Awards. Please join us as we recognize and celebrate your colleagues who have excelled in the affordable housing industry, and moved our objectives forward through their achievements.

## REGISTER NOW

for the  
**2018 CARH Midyear Meeting**  
to be held at  
**The Westin Verasa Napa in Napa, California**  
**Monday, January 22 – Wednesday, January 24, 2018**



[CLICK HERE](#) for Registration Form  
[CLICK HERE](#) for Meeting Sponsor Form  
[CLICK HERE](#) for Hotel Reservations or Call 888-627-7169

**The Midyear Meeting Brochure, with complete information on speakers and educational sessions, will be available soon on [www.carh.org](http://www.carh.org)!**

The CARH standing committees will also convene. This is your opportunity to discuss key issues for CARH to advance through its legislative work, or benefits and services you would like CARH to offer the membership. You will also have time to meet and greet the vendors and service providers who offer goods and services to the industry, often at a discount.



Enjoy visiting the famous Napa region. The seat of Napa County is Napa, the heart of the Napa Valley wine region. Its downtown is known for late-1800s and early-1900s architecture, a riverfront promenade with shops and restaurants, and an arts scene anchored by the Napa Valley Opera House. Blending downtown convenience, the Westin Verasa Napa is centrally located and within walking distance of 15 wine tasting rooms. For more information on the Westin Verasa Napa, please visit [www.westinnapa.com](http://www.westinnapa.com). For more information on the area, please visit [www.visitnapavalley.com](http://www.visitnapavalley.com).

CARH welcomes meeting sponsors! If you'd like to be one, please [click here](#) for the CARH Sponsorship Form or visit CARH's website, [www.carh.org](http://www.carh.org). The detailed meeting brochure will be available on CARH's website within the next few weeks. In the meantime, take advantage of the [discounted registration rates](#) now.

We look forward to seeing you in January in Napa!

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# NORTH BAY FIRE RELIEF



## Disaster Relief for Napa Valley Region *The North Bay Fire Relief Fund*

Wild fires in the Napa Valley and Sonoma regions of Northern California have destroyed thousands of acres of land, vineyards, businesses, and entire neighborhoods. The heroic efforts of the firefighters and others have managed to contain the fires. Now the recovery is underway. The short and long-term needs for recovery and re-building will be tremendous. CARH members who wish to help support those impacted by this tragedy, may contribute to a wide variety of organizations of their choice, but one that we think looks good is the North Bay Fire Relief Fund. This fund gives 100% of the donations to those in need in all four counties affected, which are Napa, Sonoma, Mendocino and Lake Counties.

To learn more about the North Bay Fire Relief Fund, or make a contribution please visit: [www.redwoodcu.org/northbayfirerelief](http://www.redwoodcu.org/northbayfirerelief)

## HUD Reorganization Contains Ideas Large and Small - Rent Reforms, Fewer Field Offices & Staff Cuts

By Joseph P. Poduska, Poduska & Associates



Joseph Poduska

Each new administration takes a run at reorganizing the Department of Housing and Urban Development (HUD), and now it's President Donald Trump's turn. This summer HUD filed a draft reform plan with the Office of Management and Budget that calls for comprehensive rent reforms for its rental assistance (RA) programs, the potential closing of field offices, and a reduction of about 300 full-time jobs. The plan raises the perennial question of whether HUD and Rural Development's (RD) rural housing programs should be merged. And there are other, less dramatic, ideas to create efficiencies such as consolidating office space and sharing services with other federal agencies.

More an outline than a complete document, some ideas in the plan would require legislation and others can be achieved through HUD administrative action, either on its own or in cooperation with other departments. The plan is part of a larger effort by the Trump Administration to reorganize federal agencies and to cut the federal workforce. The HUD plan describes strategic goals, areas to be reformed, and initiatives to maximize employee performance.

"HUD will further explore opportunities to merge duplicative functions across federal agencies," the plan states. The Administration will consider the merger of HUD housing programs with rural and veterans housing programs at the U.S. Department of Agriculture and the Department of Veterans Affairs.

In the recent past, there has been some progress toward greater efficiency without merging programs. The Government Accountability Office (GAO) has noted that HUD and the Rural Housing Service (RHS) have shared beneficial practices, for example restructuring multifamily mortgages, underwriting guaranteed loans, and making properties more energy efficient. The Obama Administration created a Rental Policy Working group that coordinated rules for rental programs run by HUD, USDA, and the Treasury Department. The agencies have adopted a common physical inspection protocol. But it appears the merger discussion will continue as the Administration re-examines this question. Any program consolidations would require congressional action.

The draft plan lists other areas for potential merger with HUD operations: real estate owned property disposition of the VA and Small Business Administration, economic development programs of the Economic Development Administration at the Commerce Department, disaster assistance responsibilities with the Federal Emergency Management Agency, and oversight of the low-income housing tax credit (Housing Credit) program with the Treasury Department. In a 2015 report, GAO asked that Congress consider designating certain housing tax credit oversight responsibilities to HUD. The agency has experience working with allocating agencies and has processes in place to oversee the agencies. So far, Congress has not seriously considered legislation to give HUD an oversight role for Housing Credits.

### Rent Reforms

HUD proposed rent reforms in its Fiscal Year (FY) 2018 budget, but the administration plans to develop a more comprehensive rent proposal next year. According to the plan, the department "will re-examine how HUD provides rental assistance and propose sustainable policy reforms to assist those most vulnerable while incentivizing work-able families to become economically independent."

The goals of rent reform are to have rental assistance programs that "empower PHAs, reduce costs, provide administrative flexibilities, and

streamline the administratively burdensome calculation of income and rent.” The plan states that HUD will adopt rent reform to operate more efficiently while not displacing families and reducing the impact on communities.

The President’s FY18 budget proposed increased tenant contributions toward rent. Also, a one-year freeze on annual rent adjustment increases was proposed for Section 8 project-based rental assistance, Section 202 housing for the elderly and Section 811 housing for the disabled. And housing authorities would have expanded waiver authority for Housing Choice Voucher and public housing rules.

But rent reforms require legislation, and the administration encountered a major obstacle this year when the Appropriations Committees did not to adopt the proposed changes. The appropriators insisted that HUD follow the regular order of business and submit the reforms as a legislative package to the authorizing committees – the House Financial Services Committee and Senate Banking Committee – so the details can be vetted through public hearings and the drafting process.

The FY18 proposed rent changes proved controversial. Tenant advocates opposed higher tenant rent contributions even though the administration would allow individual renters to request and receive hardship exemptions. In addition, Section 8 owners are staunchly opposed to the one-year rent freeze. The Senate Appropriations Committee, in a committee report accompanying its FY18 HUD funding bill, expressed concern about achieving cost savings through higher rent burdens on tenants, in particular the elderly and disabled. Also, the House Appropriations Committee, as an alternative to legislating rent changes, directed HUD to act within its existing authorities to reduce administrative burdens on PHAs.

### Field Office Reorganization

HUD will consider closing field offices with few employees to save on salaries and benefits, administrative services and lease costs, as well as technology costs. This would build on HUD’s small office closure initiative of 2013, which closed 15 small field offices.

Congress and labor unions representing HUD employees will have to be consulted about office closings. To implement the 2013 closings, HUD signed a memorandum of understanding with the American Federation of Government Employees that described how HUD would handle voluntary early retirement or separation payments and reassignment of personnel. Lawmakers often oppose the closing of field offices in communities they represent, to avoid the loss of jobs in their communities and the loss of face-to-face access to HUD staff.

With the need to consult stakeholders, lawmakers, and labor unions, the plan cautiously sets parameters for office closings: “HUD would only close offices after taking into consideration travel and expenses necessary for other field offices to maintain support for communities and limit impact on HUD’s grantees and stakeholders.”

One Trump Administration goal is to reduce the federal workforce, and at least in the near term, the cuts would be accomplished through attrition. At HUD, the staff cuts would be related mostly to field office closings. The HUD workforce reductions would occur over four years and would be implemented through early retirement and voluntary separation payments. Vacant positions can also be eliminated. The reductions were identified in the FY18 budget, which called for cutting HUD staff by approximately 300 full-time equivalent (FTE) positions from 8,029 to 7,713 FTEs.

### Administrative Flexibility

HUD plans to work with OMB and the Appropriations Committees to improve the department’s flexibility to respond to changing circumstances.

One area mentioned in the draft plan is to establish a mutual understanding of thresholds that allow HUD to make changes in policy or processes. Currently, certain changes to the organization not made through appropriations acts require HUD to obtain OMB and Congressional approval. “The threshold for Congressional approval is not uniform, nor does HUD have a standard policy for implementation,” HUD said in its draft plan.

### Modernizing Process, IT Systems

The draft plan also calls for process improvements. “Many HUD processes are administratively cumbersome and unnecessary,” the reform plan states. “HUD is encouraging program offices to undertake Quality Improvement projects that will streamline processes, reduce costs and staff time to complete processes, and serve HUD’s customers effectively and efficiently.” HUD also proposes to modernize its information technology systems. “HUD’s IT services are not standardized, and offices incur high costs for antiquated systems that do not meet business needs,” the plan says. Outdated IT systems are blamed for impeding transitions from slower, manual processes and collaboration among different HUD programs and offices.

All HUD headquarters offices would be consolidated in the Weaver Building in Washington, D.C. to reduce costs. The department spends about \$11.8 million yearly on four leases within walking distance of the Weaver Building. HUD has reduced its office space by 268,235 square feet since FY 2010. HUD also plans to modernize space within the Weaver Building to enhance worker productivity.

### Secretary Carson’s Priorities

The reform plan is part of HUD Secretary Ben Carson’s **Forward** initiative, which he described at an October 12<sup>th</sup> hearing of the House Financial Services Committee. The plan has three elements: “Reimagine how HUD works. Restore the American dream. Rethink American communities.” Reimagining how HUD works refers to many elements of the draft reform plan: improving HUD’s internal processes, working conditions, and employee training. For example, the draft plan calls for an enterprise-wide customer service program. Although better customer service would extend to housing authorities and owners of HUD-assisted housing, Carson said the goal of every improvement at HUD is to provide better service to those in need. “Our job is to restore the American dream, getting Americans back on their feet and permanently improving their lives.”

Other elements of the **Forward** initiative call for ending veterans’ homelessness, expanding public-private partnerships, and eliminating lead-based paint and other hazards from housing. Carson said HUD should also engage the help of the most effective charities, philanthropies, and religious institutions to help low-income families become economically independent. He added that HUD is committed to continuing to serve those, such as the elderly and disabled, who may always need rental assistance because of their personal circumstances.

*Joseph P. Poduska is President of Poduska and Associates. He may be reached at [joepoduska@gmail.com](mailto:joepoduska@gmail.com).*

**The CARH News**

*If you have questions, comments, suggestions, or submissions for the CARH News, please contact Tamara Schultz, Membership Manager, at [tschultz@carh.org](mailto:tschultz@carh.org) or 703-837-9001.*

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# “Perfect is the Enemy of Good”

By Mark E. English, E&A Team, Inc., and Scott P. Moore, Baird Holm L.L.P.



Mark English



Scott P. Moore

François-Marie Arouet, whose pen name was Voltaire, was a French writer, historian, and philosopher in the 1700s. Voltaire, known for his wit, was an outspoken advocate of civil liberties. When Voltaire coined the phrase “perfect is the enemy of good”, we are quite sure he was not thinking about the

imperfections of two by fours, sheet rock, and accessibility regulations. But “perfect is the enemy of good” aptly describes the state of the nation’s current stock of multi-family housing that does not meet federal accessibility requirements and why we continue to see multimillion dollar settlements of accessibility lawsuits.

Every year, the multi-family housing industry is subject to scores of complaints filed by the U.S. Department of Justice (DOJ), the U.S. Department of Housing and Urban Development (HUD), advocacy groups, and individuals with disabilities, seeking millions of dollars for violations of the Fair Housing Act, Section 504 of the Rehabilitation Act of 1973 (Section 504), and the Americans with Disabilities Act (ADA).

One of the most recent examples of such a case is *Independent Living Center of Southern California, et al. v. The City of Los Angeles, et al.*, U.S. District Court, Central District of CA, No. 2:12-cv-000551-FMO-PJW, in which three disability and fair housing advocacy groups claimed the City of Los Angeles failed to comply with Section 504 and the Fair Housing Act because the developments receiving funding from the City were inaccessible. In August 2016, Los Angeles settled the case by agreeing to pay \$200 million over ten years to create accessible housing, \$4.5 million to the advocacy groups, and \$20 million in attorneys’ fees.

In May 2017, the DOJ intervened in *United States ex rel. Ling, et al. v. City of Los Angeles, et al.*, U.S. District Court, Central District of CA, No. CV-11-00974, a separate False Claims Act lawsuit against the City alleging the City fraudulently obtained millions of dollars in housing grants because it failed to ensure the developments receiving federal funding from the City met the requirements of Section 504. The DOJ is seeking approximately \$2.1 billion dollars from the City in the False Claims Act case which includes treble damages.

Why are so many properties still not accessible almost thirty years after HUD adopted Section 504 accessibility requirements, and the Fair Housing Act and ADA were passed by Congress? My company specializes in accessibility consulting and inspections and we have inspected properties in all fifty states and U.S. Territories over the last 25 years. Through our decades of experience, we have learned that inspecting properties for compliance with accessibility laws is necessary, but it simply is not enough. If the multi-family housing industry has any chance to ensure compliance with accessibility laws and avoid lawsuits, it must do much more from the beginning of the development process until the last certificate of occupancy is issued for the development.

Our industry has set itself up for failure by clinging to an outdated compliance process and designing and building housing to meet only a minimum standard of compliance. We believe that everyone in the industry has the desire to ensure persons with disabilities can use and enjoy our properties in the same way that persons without disabilities can. However,

we design and build to the minimum standard which means if any trade deviates from the design, even by the smallest margin, it results in elements that are not accessible.

This process starts with the architect who initially designs the plans for the property. We see it over and over again. The architect, more often than not, does not take into account the real-world conditions experienced during the construction phase. They develop a set of plans with the expectation that the construction materials and the environmental conditions will be “perfect.” But this simply is not the case. Lumber is not straight, sheet rock is not perfect, and the ground shifts, freezes, and thaws. Defects in the building materials and aberrations in the weather are not only possible, but are in fact, probable and should be planned for from the beginning. Perhaps most important, while many architects receive training on the ADA requirements, very few receive training on the requirements of Section 504 or the Fair Housing Act. While we start our projects with the best of intentions when it comes to accessibility, we have actually set ourselves up for failure.

So how do we go about fixing this problem? We believe and are committed to, establishing a set of best practices for accessibility compliance with all governing accessibility regulations. This is a multi-part plan that starts with educating everyone involved in the design and construction of multi-family housing from the top down. To quote *All the President’s Men*, “follow the money.” No multi-family properties can be constructed without first obtaining financing. We need to bring all funding agencies and lenders on board with knowing, understanding, and implementing the best practices for accessibility compliance.

State housing finance agencies should require as part of their Qualified Allocation Plans (QAPs), that each new construction and rehab project have the development team attend a mandatory live accessibility training, covering all the accessibility requirements for Section 504, the Fair Housing Act, and the ADA. This training ideally would last a minimum of five hours to adequately cover all the required topics. The development team includes architects, developers, owners, contractors, job superintendents, and all sub-contractors for all trades that affect the accessibility of the property in any way (i.e. grading, concrete, framing, electricians, plumbers, sheet rock, cabinetry, etc.). This required accessibility training should be written into the contract for service.

Not all multi-family housing receives funding from a state housing finance agency, so lending institutions must also require that developers have all plans reviewed and on-site accessibility construction inspections performed by an accessibility specialist. These accessibility inspections identify any accessibility deficiencies at the property. A clearance letter from the accessibility specialist would be required upon the project’s completion certifying that, as of the date of the letter, the property is in compliance with all applicable federal, state, and local accessibility standards and regulations.

We know this will work because we have seen the results with our clients. Not long ago one of our clients called at home, late at night, because he had just read about a recent accessibility lawsuit filed against a developer. Our client said, “I want you to establish a plan of action for my company. I want to involve my architects, my construction company, and my management company. I want to EDUCATE everyone so we can identify our accessibility deficiencies and put a plan in place so our company doesn’t become the next headline. I want education seminars, I want plan reviews, I want accessibility construction inspections, and then I want you to come back at least every couple of years to identify all the accessibility issues, from the ground shifting, freezing, and thawing, that were not

—continued on page 10

—continued from page 9

present when you did your last accessibility inspection. I don't want to see my 'life's body of work' go down the drain overnight."

We started putting a plan in place the next morning. It was not easy but the results have been tremendous. We found elements on all of the properties that were inaccessible but now are corrected. We had architects and construction managers thank us for providing training that when the training session began, they did not think they needed. The owner was so pleased with the best practices for accessibility compliance that he informed us and his company that "this is our new DNA."

We urge the entire multi-family housing industry to take responsibility and hold our industry accountable for providing accessible housing. We must educate our entire development team. We must ensure our plans are compliant before construction. We must review construction throughout

the building process to make sure our plans become a reality. We know old habits die hard, but the only way to eliminate the headlines announcing that another developer or architect has been sued for failing to design and construct accessible housing is to change the way we do business.

*Mark English is a national accessibility consultant involving the ADA, Section 504, and The Fair Housing Act. He is the founder and President of E&A Team, Inc. The company is an Advisory Trustee member of CARH. He can be reached at [mark@eandateam.com](mailto:mark@eandateam.com) or 205-722-9331.*

*Scott P. Moore, partner at Baird Holm LLP, is a nationally recognized expert in housing law and litigation. He is a former senior trial attorney with the Housing and Civil Enforcement Section of the U. S. Department of Justice. Mr. Moore provides fair housing, ADA, and Section 504 training across the country to housing providers and national organizations. He can be reached at [spmoores@bairdholm.com](mailto:spmoore@bairdholm.com).*

## Devesh Kamal Named CSH Affordable Housing Team Leader

Clark Schaefer Hackett (CSH) recently announced that Devesh Kamal, CPA, will be leading the firm's **Affordable Housing Industry Group**, one of its largest dedicated industry groups. "Our experienced Affordable Housing advisors are known for their knowledge, expertise and service, and we look forward to healthy growth under Devesh's leadership," said CSH President Kerry Roe.



Kamal concentrates his practice on the business needs of those who develop, finance, or otherwise support the affordable housing sector. He provides full-service accounting, auditing, and tax advisement to partnerships and nonprofit organizations that develop projects funded with low-income housing tax credits and Rural Development finance. He also works with the syndicators and investors who fund these projects, public housing agencies, and state finance agencies. Kamal was recently named the shareholder-in-charge of CSH's Springfield, Ohio, office.

Founded in 1938, Clark Schaefer Hackett is a top 100 CPA and advisory firm with more than 400 shareholders and staff and 7 offices through Ohio and Kentucky.

For more information, please visit [www.cshco.com](http://www.cshco.com).

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## Affordable habitational risk solutions from industry experts



With more than 40 years of industry-related insurance experience, Wells Fargo Insurance provides a variety of risk solutions for the habitational industry. We've been exclusively endorsed by the National Council for Affordable and Rural Housing (CARH) for the past 30 years, and we are also endorsed by the National Affordable Housing Management Association (NAHMA).

### Available habitational risk solutions include

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# ORIX USA Acquires Lancaster Pollard

*Complementary businesses are the foundation for building U.S. housing infrastructure*

ORIX USA (ORIX), a division of a leading international financial services group ORIX Corporation, recently announced the acquisition of Lancaster Pollard Holdings LLC. Based in Columbus, Ohio, Lancaster Pollard is a provider of integrated investment banking, mortgage banking, balance sheet lending and private equity services focused on the full continuum of senior living and healthcare clients. Lancaster Pollard is also a leading FHA/HUD Lean senior living lender. After signing a definitive agreement to acquire Lancaster Pollard on June 9, 2017, ORIX completed the transaction on Sept. 12, 2017. Lancaster Pollard is a long-time CARH Advisory Trustee member.

"As a continued commitment to building American infrastructure, ORIX has made another investment in a high-value brand serving the senior living and healthcare sectors," said Hideto Nishitani, ORIX USA's Chairman, President and CEO. "The acquisition of Lancaster Pollard is a natural extension of ORIX's successful strategy of acquiring leaders in affordable, seniors and healthcare housing finance, as evidenced by our previous acquisitions of RED Capital Group and Boston Financial Investment Management. Having these three companies under the ORIX umbrella extends our ability to improve the quality of life in our communities through investments in seniors housing and healthcare."

Lancaster Pollard is a new separate subsidiary of ORIX alongside [RED Capital Group](#) ("RED") and [Boston Financial Investment Management](#) ("Boston Financial"). All three ORIX subsidiaries will continue to operate as separate companies with their current management. Andrew Garvey, Senior Managing Director and Head of ORIX Commercial Mortgage Servicing, will have overall responsibility across the three businesses, managing the synergistic growth opportunities provided by the larger platform.

"There is a great deal of synergy between Lancaster Pollard, RED and Boston Financial, with all three companies focused on the vital sectors of housing and healthcare for our most in-need populations," said Lancaster Pollard CEO, Nick Gesue. "Our firm and ORIX share strong and unique high-performance cultures. With its proven track record of profitability and growth, ORIX holds the intellectual and financial capital that will fuel and accelerate the growth of our company. We're thrilled with the confidence

that one of the largest global financial services companies has shown in our platform and employees, and together we are positioned for a new chapter in our company's history, focused on innovation and growth."

With a strategy of growing its multifamily, seniors and affordable housing businesses, ORIX bought an 88 percent stake in RED in May 2010, making it the foundation of ORIX Commercial Mortgage Servicing. Last year, ORIX reaffirmed its commitment to RED by purchasing the remaining 12 percent interest in the company. RED is recognized for its 27 years of industry expertise, innovative and comprehensive structures, and consistently high rankings. The company has provided over \$75 billion of integrated debt and equity capital since 1990. RED is a Fannie Mae DUS® lender, a MAP- and Lean FHA lender and a Freddie Mac small balance lender with a combined mortgage servicing portfolio exceeding \$16 billion.

In July 2016, ORIX acquired Boston Financial. The acquisition combined the financial strength and innovative capital solutions of ORIX with Boston Financial's 48-year history and track record as one of the largest syndicators in the Housing Credit industry. Since its inception, Boston Financial has raised over \$11 billion of low-income housing and historic tax credit equity, and acquired over 2,400 properties.

Moving forward under the ORIX Commercial Mortgage Servicing umbrella, Lancaster Pollard will focus on the financial, capital and advisory needs of senior living and healthcare clients, and RED will do the same in the affordable and market rate multifamily sectors. Boston Financial will continue to provide tax credit equity and related development capital to all three housing sectors.

"ORIX Commercial Mortgage Servicing is well-positioned to make a positive impact on the U.S. housing infrastructure through the subsidiaries of Boston Financial, Lancaster Pollard and RED," Garvey said. "Further, we believe that having RED focus on its leading position in affordable and market rate multifamily housing and Lancaster Pollard focus on its leading position in seniors and healthcare housing will provide clients with the highest level of expertise and service and also ensure optimal coordination with the housing agencies and FHA. Together, this group of well-known, industry-leading brands will provide a comprehensive product offering, seasoned sector expertise, unparalleled client coverage and high levels of service."

Advisers for ORIX USA on the transaction included Beekman Advisors Inc. and Houlihan Lokey Inc. for financial and Weil, Gotshal & Manges LLP for legal. For Lancaster Pollard, Credit Suisse Securities (USA) LLC served as financial adviser and Kramer Levin Naftalis & Frankel LLP as legal adviser.

*For more information, visit [www.orix.com/lancasterpollard](http://www.orix.com/lancasterpollard).*

## Special Thanks to Our Preferred Buyer Vendors

**HD Supply**

**ONLINE Rental Exchange**

**The Sherwin-Williams Company**

**Staples Business Advantage**

**Wells Fargo Insurance Services USA, Inc.**

## CARH MEMBERS:

Remember to visit [www.carh.org](http://www.carh.org) where you'll find the "Resources" and "Members Only" sections "Helpful Links" and "Forms and Other Best Practices." These sections of the website contain valuable information that CARH provides exclusively for members!

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ADVISORY TRUSTEE PROFILE

**E&A Team, Inc.**

E&A Team, Inc. is one of the Premier Housing Compliance Companies in the United States. Founded in 1992, E&A provides all types of Housing Compliance trainings on such topics as: Housing Credits, RD, HOME, HUD, Fair Housing, and Accessibility.

E&A also is one of the nation's leading Accessibility Site Inspection companies for compliance with the ADA, Section 504, and the Fair Housing Act. E&A has inspected over 500,000 multi-family units in every state and U.S. Territory, except for Saipan.

Mark English, President of E&A Team, Inc., is an active CARH Advisory Trustee member and Chair of



the Initiatives Committee of National CARH. A CARH member since 1995, Mark is a past board member of national CARH and was named the 2006 CARH Member of the Year. He also is a past President of the Alabama Affordable Housing Association (formerly, the Alabama Council for Affordable and Rural Housing).

A leading training specialist on accessibility issues, Mark English has taught over 600 Accessibility Educational Seminars for national organizations such as CARH, the National Council of State Housing Agencies, and the National Apartment Association.

In addition to the high-quality live training sessions the company has long been known for, E&A now offers online training courses as well. Industry professionals can now participate in training on their own schedule and at their own pace with the online training.

For more information about E&A, please visit [www.EandATeam.com](http://www.EandATeam.com).

STATE AFFILIATED PROFILE

**Council for Rural Housing & Development of Ohio**  
*A Unified Voice for Rural Housing Development*

Compiled by Betsy Valentine, Marketing Consultant, CARH

CARH is pleased to profile the Council for Rural Housing & Development of Ohio (CRHDO), a state affiliated association. CRHDO is an advocate in the rural housing industry, working on the national, state and local levels to provide a voice for continued support of rural housing initiatives. Members include professionals from every sector of the housing community, including builders, owners, developers, managers, non-profits, housing authorities, syndicators, accountants, architects, attorneys, bankers and other companies that supply goods and services to the industry. They are based in Columbus, Ohio. CRHDO works closely with National CARH to promote the needs of its members.



CRHDO provides training and meetings for its members, and held their Annual Ohio Rural Housing Conference in September, in Cincinnati, Ohio.

Current officers are:

Officers	Board Member	Organization
President	Ian Maute	Buckeye Community Hope Foundation (National CARH Board Member)
Vice President	Ryan Landi	Testa Companies
Treasurer	Jennifer Mullaney	Ohio Capital Corporation for Housing
Secretary	Ben Goates	National Development Council
Chairman	Beverly Patrone	RLJ Management

For more information, please visit <http://www.crhdo.org/>.

**Subscribe to CARH's Electronic AN Express Today**  
*Exclusively for CARH Members*

The *Electronic AN Express* contains key excerpts from the *Federal Register*, RD Administrative and Procedural Notices, Unnumbered Letters, HUD Housing Notices and other regulatory notices relevant to the affordable housing industry. The *Electronic AN Express* is emailed directly to our subscribers the same day they are released. Instead of having to go through pages and pages of reports, you get just the information you need as soon as it is available.

The *Federal Register*, known as the daily newspaper of the Federal government, is a legal newspaper published every day by the National Archives and Records Administration (NARA). It contains:

- Federal Agency Regulations
- Proposed Rules and Public Notices
- Executive Orders
- Proclamations

CARH members exclusively may subscribe to the *Electronic AN Express* for an annual fee of \$255.00. To order your subscription today, just email [carh@carh.org](mailto:carh@carh.org) or call 703-837-9001. Don't miss crucial information which may impact your business!



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*CARH Preferred Buyer-Vendor*

# Time to Renew Your CARH Membership!

By Tamara Schultz, Membership Manager

With the end of 2017 rapidly approaching, it's time for CARH members to renew their membership for 2018! As a CARH member, your business will continue to benefit from the many advantages of belonging to the premier organization representing the rural housing industry! You are an integral part of the important work we do to advance our industry.

In the next few months, CARH will focus on making needed changes to the tax bill as proposed by the House Ways & Means Committee (see Executive Director's message on page 1) and the final Omnibus Appropriations bill for Fiscal Year 2018, to ensure that it contains adequate funding for all affordable housing programs. We will work with Congress to ensure that sufficient funds and resources are provided for areas of the country devastated by recent disasters.

CARH will help keep the current Administration focused on the development of policies that will lead to long-term preservation solutions for the rural housing portfolio. We will engage Congress in reviewing and examining current affordable housing policies. We'll help determine what works and needs improvement, so that procedures and policies supportive of the industry are implemented. Funding for infrastructure needs is still being discussed with the Administration and Congress. CARH is working with a broad coalition in an effort to ensure that rural communities' needs are included in these discussions.

In these times of government budget cuts and tax reform, it is crucial that CARH remains focused on being your voice in Washington on these and other key issues. We cannot accomplish this without the support and participation of our membership. Please renew your CARH membership today! Ensure uninterrupted access to CARH member benefits that save you and your properties time and money and keeps your company at the forefront of the affordable and rural housing industry.

CARH's broadcast email system alerts members to breaking industry news, including legislative updates, funding availability and regulatory changes. Members may also subscribe to the *Electronic AN Express*, which sends emails regarding RD Administrative Notices, Procedural Notices and Federal Register excerpts from RD, HUD, the Department of Treasury, Internal Revenue Services, and other agencies that affect the industry. The *Electronic AN Express* also includes advisories regarding tax credit percentages, data sets and much more.

The *CARH News* is written specifically for owners, developers, managers and associates of the affordable rural housing industry. Articles discuss and

evaluate industry trends and regulations. CARH's *Insights for On-sites* is the only publication created solely for on-site managers of affordable rural communities.

Members have access to the members-only portion of the CARH website, which has the latest industry news, monthly tax credit percentages, upcoming meetings, member and vendor directories and links to our Preferred Buyer Vendors.

When you renew, remember to pay your properties' education and training fees! Due to CARH's efforts, RD permits properties to pay a training and education fee. This gives members access to educational tools that help their onsite managers become more efficient and effective. You will receive discounted registration rates for training programs.

CARH's Preferred Buyer Program offers significant discounts to HD Supply, ONLINE Rental Exchange, The Sherwin Williams Company, Staples and Wells Fargo Insurance Services USA. Also, residents of CARH-member properties are eligible to apply to the CARH Scholarship Foundation's annual scholarships.

Renewing your membership is easy. Renewal notices were mailed at the beginning of October to all direct-billed CARH members. Send the completed form that was enclosed, the appropriate membership dues, and property education and trainings (if appropriate), along with a listing of those properties, to the national CARH office at:

CARH  
116 S. Fayette Street  
Alexandria, Virginia 22314

National direct-billed CARH members can pay by check or credit card (American Express, MasterCard, Visa, Discover or Diner's Club). **State affiliated associations that send invoices for CARH national dues at the same time as they invoice for their state dues, will be sending out your renewal notices for 2018 dues soon.**

**If you have not yet joined CARH at the national level, please submit the membership application on page 17, or visit [www.carh.org](http://www.carh.org).**

We appreciate your membership in CARH and look forward to your continued partnership as we move into 2018 and beyond!

*Please note: 70% of CARH membership dues are tax deductible (30% fund CARH's legislative efforts). No portion of the property training and education fees paid by the properties you own or manage are allocated toward CARH's lobbying effort. If you have any questions regarding your membership or the property training and education fees, please contact Tamara Schultz, Membership Manager, at 703-837-9001 or [tschultz@carh.org](mailto:tschultz@carh.org).*

## Special Thanks to Our Advisory Trustee Members

Bernard Robinson & Company, LLP  
Clark Schaefer Hackett  
E&A Team, Inc.  
Gill Group  
Greystone Affordable Development

HD Supply  
Lancaster Pollard Mortgage Company  
Parker General Contractors, LLC  
Propp Christensen Caniglia, LLP  
The Summit Group

Tidwell Group  
Wallace Architects, LLC  
Warrior Run Development Corp.  
Wells Fargo Insurance Services USA, Inc.  
Yardi Systems, Inc.



# Join CARH Today!

## Step 1 – Complete contact information form

Name: \_\_\_\_\_  
Company/Organization: \_\_\_\_\_  
Address: \_\_\_\_\_  
City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_  
Phone: \_\_\_\_\_ Fax: \_\_\_\_\_  
Email Address: \_\_\_\_\_ Website: \_\_\_\_\_  
How would you best describe your company?  Developer  Manager  Owner  Syndicator/Equity Financier  
 Vendor/Supplier of Services  Non-profit  Other (please describe)

## Step 2 – Select your membership level

### BASIC MEMBERSHIP

For management companies, owners, developers, syndicators with property ownership, and non-profits who manage or own rural housing. Choose one of the following three categories:

- \$900 Basic Membership**
  - Subscription to *CARH News*
  - Bound Membership Directory, updated yearly
  - Up-to-the-minute Broadcast Email alerts
  - Participation in Preferred Buyers Program
  - Discounts on CARH meetings, seminars, and training
  - Eligibility for CARH's nationally recognized education designations
  - Voting rights
  - Access to members only section of CARH website
  - Logo usage
  - Access to CARH National Staff
- \$1,850 Basic Plus Membership**  
**Benefits of "Basic" Membership, plus...**
  - Further reduced meeting rates
  - Special briefings at CARH meetings as needed
  - Special listing in Membership Directory and on CARH website
- \$4,250 Advisory Trustee Membership**  
**Benefits of "Basic Plus" Membership, plus...**
  - Full-page colored advertisement in four issues of *CARH News* each year
  - One free registration to each of CARH's National meetings, additional registrations further discounted
  - Special meetings to discuss industry trends and to help shape CARH's legislative priorities

**Properties covered by your membership** By joining your properties to CARH, your properties can participate in the Preferred Buyers Program, as well as receive discounts on CARH-sponsored training. In addition, properties will receive CARH's *Insights for Onsites* newsletter written specifically for managers and maintenance personnel of affordable housing communities. The Property Training and Education Fees for properties according to their size are:

1-24 unit property = \$50

25-49 unit property = \$100

50+ unit property = \$150

Please attach to this form, a list of your properties that you would like to have join CARH. Be sure to include the property name; property mailing address, onsite contact name, number of units, and the appropriate Property Training and Education Fee being paid for each property.

### ASSOCIATE MEMBERSHIP

For accountants, architects, attorneys, equity financiers, lenders, syndicators, computer and software vendors, market analysts, sight inspection services, and other companies that provide services to the rural housing industry. Choose one of the following three categories:

- \$900 Associate Membership**
  - Subscription to *CARH News*
  - Bound Membership Directory, updated yearly
  - Up-to-the-minute Broadcast Email alerts
  - Participation in Preferred Buyers Program
  - Discounts on CARH meetings, seminars, and training
  - Eligibility for CARH's nationally recognized education designations
  - Voting rights
  - Access to members only section of CARH website
  - Logo usage
  - Access to CARH National Staff
- \$2,600 Associate Plus Membership**  
**Benefits of "Associate" Membership, plus...**
  - One free registration and an exhibition booth at each of CARH's National meetings, additional registrations further discounted
  - Full-page colored advertisement in three issues of *CARH News* each year
  - Special listing in Membership Directory and on CARH website
  - Company description and link to your website on CARH's online vendor directory
- \$4,250 Advisory Trustee Membership**  
**Benefits of "Associate Plus" Membership, plus...**
  - One additional full-page colored advertisement in *CARH News* each year (four total)
  - Special meetings to discuss industry trends and to help shape CARH's legislative priorities

## Step 3 – Subscribe to CARH's Electronic AN Express

Subscribe to CARH's *Electronic AN Express* which provides you with *Federal Register* excerpts from RD, HUD, Treasury, IRS, and other federal agencies; RD Administrative Notices, RD Procedural Notices, RD Unnumbered Letters, HUD Notices, HUD data sets such as Income Limits and Difficult Development areas; and more, on the day they are published.

Check to subscribe:  \$255 per year

## Step 4 – Submit your application and payment to CARH

Mail your completed application and payment to: CARH, 116 S. Fayette St., Alexandria, VA 22314 or fax to 703-837-8467.

Make checks payable to "CARH." Complete below to pay by credit card payment:

American Express  Visa  MasterCard  Discover  Diner's Club

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Name as it appears on card: \_\_\_\_\_

Billing Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

Signature: \_\_\_\_\_

Questions? Call 703-837-9001 to speak to a CARH staff member!

# CARH Scholarship Foundation Accepting Applications for 2018

By Rodney Corley, President, CARH Scholarship Foundation

CARH is pleased to announce that we are accepting applications for 2018 scholarships! The CARH Scholarship Foundation was established in 2005 to promote education and expand opportunities for residents of affordable housing in rural America. The Foundation offers five scholarships. Three are in memory of CARH members who left distinguished records of service to CARH and the affordable rural housing industry, one is in honor of the founding members of the organization, and the most recent is in honor of the Scholarship Foundation. The Scholarships are as follows:

**James L. Poehlman Scholarship** – James L. Poehlman was a founding member of CARH, served on CARH’s Board of Directors, was Chair of the Owners and Development Committees, and Co-Chair of the Aging Portfolio Committee. He was also an Advisory Trustee and received the 1998 Member of the Year Award.

*Recipients of the James L. Poehlman Scholarship are:*

2006 – Charmelia Danielle Davis	2012 – Rebecca Collett
2007 – Amanda Hayes	2013 – Nyshira Jackson
2008 – Angela Hobson	2014 – Kennedy Lamb
2009 – Trey Jensen	2015 – Whitney Cale
2010 – Paula Lockhart	2016 – Emerson Miller
2011 – Christen Canada	2017 – Chelsea Parsons

**Gordon L. Blackwell Scholarship** – Gordon L. Blackwell was a longtime CARH member and past member of CARH’s Board of Directors. He was President and Chairman of the Regency Housing Group and GLB Associates in Raleigh, North Carolina

*Recipients of the Gordon L. Blackwell Scholarship are:*

2006 – Lyshanda Robinson	2012 – Sonia Frederick
2007 – Britania Hutchinson	2013 – Dy’Lean English
2008 – LaSquizzie Kern	2014 – Joseph Butts
2009 – DoMonique Mitchell	2015 – Victoria Graham
2010 – Grace Belnap	2016 – Tybee Serrell
2011 – Jessica Kirkpatrick	2017 – Celeste Nzeza

**Jack Godin, Jr. Scholarship** – Jack Godin, Jr., was a founding CARH member and former President. He was also founder and president of Southern Development Company, LLC, in Montgomery, Alabama.

*Recipients of the Jack Godin, Jr. Scholarship are:*

2010 – Charles Lee	2014 – Tami Tucker
2011 – Christopher Bright	2015 – Mikayla Murphree
2012 – Deidra Sykes	2016 – Jillianna Boyd
2013 – Erica Valdez	2017 – Maggie Lavorgna

## On-site Property Managers Can Win \$250

Property managers play an integral role in the lives of residents who live in rural housing complexes. To reward managers who encourage students to apply for these scholarships, the CARH Scholarship Foundation will present \$250.00 to the manager of each complex where there is a successful scholarship recipient, as well as recognize the manager in CARH’s two publications, *CARH News* and *Insights for On-sites*.

**Ask your property managers to do their part and encourage residents to apply for a 2018 CARH Scholarship!**



*Scholarship winners: Sharonica Gavin, Dana Quintero Rodriguez, Maggie Lavorgna and Anne Hazlett, Assistant to the Secretary for Rural Development*

**CRHD Founders Scholarship** - Honors the founding members of the Council for Rural Housing and Development (CRHD), the precursor of CARH.

*Recipients of the CRHD Founders Scholarship are:*

2013 – Candace Sloan.	2016 – Katrin Metz
2014 – Stephanie Gilbert	2017 – Sharonica Gavin
2015 – Melvin Vicente	

**CARH Scholarship Foundation Scholarship** - Named in honor of the Foundation.

*Recipients of the CARH Scholarship Foundation Scholarship are:*

2015 – Shelby Foreman	2017 – Dana Quintero Rodriguez
2016 – Matthew McLaughlin	

Each scholarship grants \$1,500 per semester for educational expenses, with a maximum four years of funding. The Foundation hopes to have a record number of applicants this year nation-wide! Please inform deserving students of CARH-member properties that the foundation is now accepting applications through April 30, 2018. *(A property is considered a “CARH-member property” if it is under the management/ownership of a national CARH member and the Property Training & Education Fee has been paid for that property.)*

Applicants must provide comprehensive information including: a complete biography with supporting materials; a description of their academic careers and/or work experience; a statement of their educational plans; letters of reference; and a written essay. Applicants must be U.S. citizens or permanent legal residents and demonstrate both financial need and scholastic or work achievement. Recipients should be accepted or enrolled as a full-time student at an accredited two or four-year college or university, or an accredited vocational educational school.

Applications may be downloaded from the Scholarship Foundation section of [www.carh.org](http://www.carh.org) or by [clicking here](#). **One scholarship has been reserved for a qualified applicant who has been accepted or is enrolled in an accredited vocational or trade school program.** All applicants are eligible for the other four scholarships.

Scholarship recipients will be invited to join CARH at the 2018 Annual Meeting & Legislative Conference, June 18-20, in Arlington, Virginia. CARH will cover the travel expenses for each recipient and one guest (parent or guardian). CARH will publish the winners in an edition of its two publications, *CARH News* and *Insights for On-sites*. CARH looks forward to welcoming the 13th annual scholarship recipients to Washington, DC!

**Applications Are Due By April 30, 2018!**



# DISASTER RECOVERY UPDATES AND INFORMATION

## *Recent Information on the Recovery Efforts Around the Country and Where to Get Assistance*

### Disaster Housing Recovery Update as of Tuesday, October 31, 2017

#### Congress

- Senate Homeland Security Hearing.** Today, the Senate Committee on Homeland Security and Governmental Affairs held an oversight hearing on the federal response to the recent hurricanes. FEMA Administrator Brock Long, General Donald Jackson of the U.S. Army Corps of Engineers, Robert Salesses from the Department of Defense, and Robert Kadlec from the Department of Health and Human Services testified before the committee about their agencies' work following Hurricanes Harvey, Irma, and Maria. Questions focused mostly on restoring power in Puerto Rico and the Virgin Islands, as well as FEMA's role in the disaster response process. Administrator Long stressed that local and state governments should be leading the efforts as much as possible, advocating for more funding to be spent on ensuring cities and states are resilient and disaster ready. There was virtually no mention of short-, medium-, or long-term housing.
- Florida Senators' Letter to FEMA.** Florida Senators Marco Rubio (R) and Bill Nelson (D) sent a letter today to FEMA Administrator Brock Long expressing their concern about the lack of housing options for survivors. Delays in providing temporary housing, such as manufactured homes, and direct leasing options are leaving Floridians to live in dangerous, unsustainable housing conditions. The letter also notes that the current estimate for a housing inspection, a required step for Individual Assistance claims, is 45 days, compared to 10 days during Hurricane Katrina. The Senators ask the agency to increase housing options and the number of inspections as well as cut down the wait time for the FEMA helpline.
- Senator Cornyn's Concerns.** Senator Cornyn (R-TX) has raised concerns that, after being given assurances from Congressional leadership and the White House that a third supplemental spending bill would move quickly in November, the timeline is already slipping. He said he has been given indications that the next supplemental spending bill will require spending offsets elsewhere in the budget, and that leadership may now look to tie the bill to a year-end spending bill for the full federal government or to a Continuing Resolution. All of these elements significantly complicate the passage of additional disaster recovery and rebuilding spending for impacted communities. Meanwhile, Senator Murphy continues to circulate his letter urging that FEMA enter into an agreement with HUD to stand up a DHAP program.

#### HUD

- HUD Multifamily Update Call.** The Office of Multifamily Housing Programs had a call updating partners on their disaster recovery efforts. HUD reported that owners of HUD-assisted multifamily properties in Puerto Rico and the U.S. Virgin Islands should continue to receive vouchers for November. HUD will continue to authorize payments as long as the certification for the physical condition of the property is attached. The HUD team also provided numbers regarding properties in the affected areas:
  - Texas**
    - 454 properties in the impacted area
    - 51,072 units in the impacted area
    - 20,971 assisted units in the impacted area
    - All on-site assessments have been completed
  - Georgia**
    - 62 properties
    - 5,249 total units
    - 2,874 assisted units



*The Florida Keys*

- Florida**
  - 910 properties
  - 106,513 total units
  - 45,902 assisted units
  - 90+ on-site property assessments completed with remaining 30 scheduled by end of the week
- Puerto Rico**
  - 203 properties
  - 21,013 total units

*—continued on page 18*



California Wildfires

- 19,859 assisted units
- No on-site assessments completed. Disaster team has not been out as they have had difficulty contacting properties and obtaining access. HUD anticipates the teams will begin in mid- to late November.
- **Virgin Islands**
  - 17 properties
  - 1,474 total units
  - 1,468 assisted units
- **California**
  - 176 properties
  - 14,024 total units
  - 8,454 assisted units
  - 85% of preliminary assessments completed. Only 3 properties have reported damage, which is minor and due to smoke, not fire.

## General Update

- **DHAP Fact Sheet.** The NLIHC policy team has created a fact sheet on the Disaster Housing Assistance Program (DHAP) to use in education and advocacy efforts.
- **Hurricane Harvey Individual Assistance Registrants.** NLIHC's research team published a blog post analyzing FEMA's data on Hurricane Harvey IA registrants. They are working with FEMA to correct FEMA's public data set for communities impacted by Hurricanes Irma and Maria. Once those corrections are made, the research team will post similar analyses for Florida, Puerto Rico, and the U.S. Virgin Islands.
- **Urban Institute Housing Profiles.** The Urban Institute created three fact sheets that reveal the current housing market situation in the areas affected by Hurricanes Harvey, Irma, and past storms. The fact sheets also reveal lessons from previous storms and the challenges ahead. Data include the number of houses and mortgages, the percentage of single-family homes, the percentage of FHA- and VA-insured loans, and the homeownership, delinquency, foreclosure, and negative equity rates. Urban Institute notes that changes in the housing market before and after previous storms reveal the challenges that face Texas, Florida, and Puerto Rico following this year's devastating hurricane season. Two key factors will have a big impact on the path and pace of recovery: the type of damage that occurred, and the state of the local housing market before the storm hit.

## CALIFORNIA WILDFIRES

### FEMA

**By the Numbers:** (as of 10/31)

- 3,546 Individual Assistance (IA) applications approved\*
  - \$7,155,243 Individual & Household Program (IHP) approved\*
  - \$4,67,520 Housing Assistance (HA) approved\*
  - \$2,507,723 Other Needs Assistance (ONA) approved\*
- \*Assistance dollars approved but not necessarily disbursed.

## HURRICANE MARIA

### FEMA

#### Puerto Rico

**By the Numbers:** (as of 10/31)

- 224,032 Individual Assistance (IA) applications approved\*
- \$122,653,270 Individual & Household Program (IHP) approved\*
- \$18,672,327 Housing Assistance (HA) approved\*
- \$103,980,944 Other Needs Assistance (ONA) approved\*
- \$409,053,433 Total Public Assistance Grants (PA) obligated, all for emergency work (Categories A-B)\*\*

\*Assistance dollars approved but not necessarily disbursed.

\*\*Funds made available to the state via electronic transfer following FEMA's final review and approval of Public Assistance projects.

**Individual Assistance Numbers:** (as of 10/16)

- 375,264 referrals
- 246,387 pending applications
- 31 withdrawn
- 13,296 ineligible



Puerto Rico

### U.S. Virgin Islands

**By the Numbers:** (as of 10/31)

- 2,872 Individual Assistance (IA) applications approved\*
- \$2,369,406 Individual & Household Program (IHP) approved\*
- \$632,392 Housing Assistance (HA) approved\*
- \$1,737,014 Other Needs Assistance (ONA) approved\*
- \$16,547,917 Total Public Assistance Grants (PA) obligated, all for emergency work (Categories A-B)\*\*

\*Assistance dollars approved but not necessarily disbursed.

\*\*Funds made available to the state via electronic transfer following FEMA's final review and approval of Public Assistance projects.

**Individual Assistance Numbers:** (as of 10/16)

- 8,788 referrals
- 6,393 pending applications
- 2 withdrawn
- 513 ineligible



U.S. Virgin Islands

### Local Perspective

- Florida Governor Describes Assistance to Puerto Ricans.** A media release on the website of Florida Governor Rick Scott dated October 31 indicates that on Friday, at the invitation of Puerto Rico Governor Ricardo Rosselló, Governor Scott will lead a delegation of Florida utility providers to Puerto Rico. The media release also has a long list various forms of assistance Florida is providing to Puerto Ricans impacted by the hurricanes. Some of the figures include:
  - Since October 3rd, 2017, more than 90,000 individuals have arrived in Florida from Puerto Rico through Miami International Airport, Orlando International Airport, and Port Everglades.
- The Disaster Relief Centers at the Orlando International Airport, Miami International Airport, and the Port of Miami have served more than 19,000 individuals.
- The Florida Air National Guard has coordinated nearly 2,000 flights, bringing more than 10,000 personnel and 13,800 tons of cargo in support of Puerto Rico and the Virgin Islands.
- The Department of Health is supporting evacuees with gaining access to public health and medical programs including immunizations, prescriptions, WIC, and other programs.
- Department of Children and Families staff are on site at the Disaster Relief Centers and are actively working to help Puerto Rican families identify what public assistance benefits are available, including Medicaid eligibility. These staff are also providing instructional handouts on how to apply for these benefits.
- Florida school districts have enrolled more than 4,900 displaced students from Puerto Rico and the Virgin Islands.
- Florida Virtual School will accept 20,000 Puerto Rican students who were displaced by Hurricane Maria to ensure they are able to continue their education.

## HURRICANE IRMA

### FEMA

#### Florida

**By the Numbers:** (as of 10/31)

- 722,814 Individual Assistance (IA) applications approved\*
- \$866,095,342 Individual & Household Program (IHP) approved\*
- \$592,458,800 Housing Assistance (HA) approved\*
- \$273,636,542 Other Needs Assistance (ONA) approved\*

\*Assistance dollars approved but not necessarily disbursed.

**Individual Assistance Numbers:** (as of 10/16)

- 1,799,790 referrals

- 697,467 pending applications
- 23,922 withdrawn
- 431,760 ineligible

#### Georgia

**By the Numbers:** (as of 10/31)

- 8,827, Individual Assistance (IA) applications approved\*
- \$11,789,905 Individual & Household Program (IHP) approved\*
- \$8,567,906 Housing Assistance (HA) approved\*
- \$3,222,001 Other Needs Assistance (ONA) approved\*

\*Assistance dollars approved but not necessarily disbursed.

**Individual Assistance Numbers:** (as of 10/16)

- 26,420 referrals
- 12,766 pending applications
- 437 withdrawn
- 5,727 ineligible
- Floodplain or historic property restoration activities. FEMA posted an initial public notice concerning activities that may affect historic properties, activities that are located in or affect wetland areas or the 100-year floodplain, and critical actions within the 500-year floodplain. The public notice explains relocation considerations based on Executive Orders concerning federal actions affecting the floodplains, wetlands, and other considerations, as well as on those based on the National Historic Preservation Act. Similar notices have been published for Texas (see: Update 10/2) and Florida (see: Update 10/10).

#### Puerto Rico

**By the Numbers:** (as of 10/31)

- 763 Individual Assistance (IA) applications approved\*
- \$1,752,990 Individual & Household Program (IHP) approved\*
- \$903,423 Housing Assistance (HA) approved\*
- \$849,567 Other Needs Assistance (ONA) approved\*

\*Assistance dollars approved but not necessarily disbursed.

**Individual Assistance Numbers:** (as of 10/16)

- 2,262 referrals
- 1,263 pending applications
- 35 withdrawn
- 446 ineligible

#### U.S. Virgin Islands

**By the Numbers:** (as of 10/31)

- 3,529 Individual Assistance (IA) applications approved\*
- \$4,889,083 Individual & Household Program (IHP) approved\*
- \$2,726,908 Housing Assistance (HA) approved\*
- \$2,162,175 Other Needs Assistance (ONA) approved\*
- \$25,056,945 Total Public Assistance Grants (PA) obligated, all for emergency work (Categories A-B)\*\*

\*Assistance dollars approved but not necessarily disbursed.

\*\*Funds made available to the state via electronic transfer following FEMA's final review and approval of Public Assistance projects.

**Individual Assistance Numbers:** (as of 10/16)

- 8,351 referrals
- 5,308 pending applications
- 22 withdrawn
- 762 ineligible

—continued on page 22



Flooding in Houston

## HURRICANE HARVEY

### FEMA Texas

#### By the Numbers: (as of 10/31)

- 342,123 Individual Assistance (IA) applications approved\*
- \$1,321,046,996 Individual & Household Program (IHP) approved\*
- \$1,029,597,670 Housing Assistance (HA) approved\*
- \$291,449,327 Other Needs Assistance (ONA) approved\*
- \$474,860,721 Total Public Assistance Grants (PA) obligated\*\*
- \$411,922,596 Emergency Work (Categories A-B) obligated\*\*

\*Assistance dollars approved but not necessarily disbursed.

\*\*Funds made available to the state via electronic transfer following FEMA's final review and approval of Public Assistance projects.

#### Individual Assistance Numbers: (as of 10/16)

- 718,566 referrals
- 140,080 pending applications
- 37,192 withdrawn
- 231,319 ineligible
- **Hotel Stays Extended.** Some survivors receiving Transitional Shelter Assistance (TSA) may receive an extension for assistance until November 27. However, FEMA will conduct eligibility reviews on November 7 to decide if survivors have a need for continuing assistance. Survivors will receive a phone call, email, or text message letting them know if they qualify.

#### Local Perspectives

- **Evictions Stopped.** A Harris County judge has signed a Temporary Injunction prevented the Houston Housing Authority (HHA) from

## HUD Multifamily Disaster Recovery Update

as of October 31, 2017

This is the most recent update from HUD on its Multifamily Disaster Recovery at time of publication of the CARH News. While some of this information is included in the Disaster Housing Recovery Update, additional information is included here: the number displaced, total insured, total non-insured and UPB exposure.

Owners of assisted Multifamily properties in Puerto Rico and the Virgin Islands should continue to voucher for November and HUD will authorize payment as long as the certification for the physical condition of the

evicting residents of a high rise low income senior complex damaged during Hurricane Harvey. Lone Star Legal Aid presented the case on behalf of the residents. The property suffered flood damage in the basement and first floor. In addition, fire-protection and sprinkler systems also incurred damage. However, the building never lost power.

The Fire Marshall issued a report stating that the fire pump, sprinkler, and alarm systems were out of service and needed restoration as soon as possible and that an approved fire watch or standby inspector had to be provided or the residents would have to be evacuated. An around the clock fire watch or standby inspector was provided. The Fire Marshall also gave HHA until October 13 to cure all deficiencies.

Rather than address the deficiencies, HHA sent a letter stating that the building was totally unusable, that residents' leases would be terminated, and directing residents to evacuate with all of their possessions within five days. At a Court hearing, HA testified that two transformers could fail and explode. The Court, however "finds this testimony incredible" because the HHA official "lacks the qualifications or experience to make that determination." Rather, the Court considered the residents' electrician credible when he asserted that the type of transformers would not explode if they failed.

The Court also found the HHA testimony "incredible" because rather than repair the damage, HHA made a \$250,000 interest-free loan to cover resident's moving expenses. The residents provided credible evidence that the deficiencies could be cured for \$30,000 and that if need be, the transformers could be replaced for \$30,000 to \$40,000. The judge set a deadline of 45 days for HHA to repair the property.

- **61,000 Families Living in Hotels.** The Wall Street Journal reports that more than 61,000 families are living in hotels as a result of Hurricane Harvey. This is nearly double the number that FEMA reported to a Congressional office last week. NLIHC is working to clarify and get the latest, most accurate numbers on those living in hotels, as well as an updated breakdown on the number of IA registrants denied assistance and reasons for denials.
- **Affordable Housing.** The Houston and Oklahoma City Housing Authorities are partnering to provide people in Houston with dozens of additional housing vouchers. Recipients of the vouchers can use them in Houston or other cities.

*Reprinted from On the Home Front, the blog of the National Low Income Housing Coalition. For regular updates, please visit [www.hfront.org](http://www.hfront.org). For more information about the National Low Income Housing Coalition, please visit [www.nlihc.org](http://www.nlihc.org).*

property is attached. HUD will provide information on future subsidy payments soon.

HUD is currently reviewing if and how non-electronic vouchers can be submitted and will follow-up with more information soon.

### Overall Section 8 and Insured Impacted Properties by Hurricanes, Wildfire Report To Date (10/30/17)

#### Harvey - Texas

- 454 total number of properties in the impacted area
- 51,072 total number of units in the impacted area
- 20,971 total number of assisted units in the impacted area

- 4,924 displaced
- 129 insured total
- 93 non insured total
- \$1.1 B UPB exposure

#### **Irma – Georgia**

- 62 total number of properties in the impacted area
- 5,249 total number of units in the impacted area
- 2,874 total number of assisted units in the impacted area
- 150 displaced
- 26 insured total
- 36 non insured total
- \$179 M UPB exposure

#### **Irma – Florida**

- 910 total number of properties in the impacted area
- 106,513 total number of units in the impacted area
- 45,902 potential assisted units in the impacted area
- 625 displaced
- 348 insured total
- 561 noninsured total
- \$4.4 B UPB exposure

#### **Maria – Puerto Rico**

- 203 total number of properties in the impacted area

- 21,013 total number of units in the impacted area
- 19,859 total number of assisted units in the impacted area
- 139 displaced
- 41 insured total
- 162 non insured total
- \$229 M UPB exposure

#### **Maria – Virgin Islands**

- 17 total number of properties in the impacted area
- 1,474 total number of units in the impacted area
- 1,468 total number of assisted units in the impacted area
- 138 displaced
- 3 insured total
- 14 non insured total
- \$35 M UPB exposure

#### **Wildfire – California**

- 176 total number of properties in the impacted area
- 14,024 total number of units in the impacted area
- 8,454 total number of assisted units in the impacted area
- 0 displaced

*Source: HUD, Multifamily Communications. For more information, please visit [www.hud.gov](http://www.hud.gov).*

## HUD Disaster Resources

HUD provides a variety of disaster resources listed below. They also partner with Federal and state agencies to help implement disaster recovery assistance. Under the *National Response Framework*, the Federal Emergency Management Agency (FEMA) and the Small Business Administration (SBA) offer initial recovery assistance.

### **Mortgage Assistance from HUD's Federal Housing Administration (FHA)**

For a Presidentially declared disaster, FHA activates a mortgagee letter making a variety of insured loan programs available for disaster victims and putting into play use of special loan servicing and underwriting requirements. [Find out more.](#)

- [Mortgage Insurance for Disaster Victims \(Section 203\(h\)\)](#)
- [FHA Section 203\(k\) Rehabilitation Mortgage Insurance](#)
- [Title 1 Home Improvement Loans](#)
- [Options Available for FHA Homeowners in Presidentially -Declared Disaster Areas](#)
- [Housing Notice 04-22, Disaster Recovery Guidance by Multifamily Housing After a Presidentially Declared Disaster](#)

### **Office of Housing Counseling**

To help you prepare and respond to disasters in your community, HUD's Office of Housing Counseling has developed a [Disaster Recovery and Emergency Preparedness Toolkit](#). Resources include:

- **Emergency Preparedness Guide for Housing Counseling Agencies:** This guide will provide useful and easy-to-implement information to assist housing counseling agencies successfully prepare for any type of disaster or emergency. Developing an Emergency Preparedness Plan is one of the most important strategic decisions you will make as a housing counseling agency.
- **Emergency Preparedness and Recovery Resources for Housing Counseling Agencies:** This document was originally developed for housing counseling agencies. However, it contains a comprehensive list of website resources to help anyone prepare their community for a disaster. The web links provided are best reviewed ahead of an actual

disaster since Internet access is not guaranteed during emergency situations.

- [Housing Counseling Disaster Program Guide:](#) Housing counselors play a critical role in helping communities impacted by disaster connect families to key housing resources. This universal document provides a model for HUD-approved housing counseling agencies to expand and support their long-term disaster recovery services as part of their grantee action plan in their respective jurisdictions receiving Federal disaster recovery funds.

### **Assistance from Ginnie Mae**

Ginnie Mae encourages all single-family, manufactured housing, and multifamily Ginnie Mae issuers offering forbearance to provide forbearance to mortgagors in areas receiving a Presidential disaster declaration. In certain instances, Ginnie Mae will assist issuers in their efforts to offer forbearance to mortgagors with pass-through payments. Visit [Ginnie Mae's website](#).

### **Office of Multifamily Housing**

Having the right plan in place before a disaster will ensure an effective, coordinated response. [The Ready to Respond: Disaster Staffing Toolkit](#) is a guide developed by Enterprise Community Partners, Inc. in partnership with HUD, to help affordable multifamily housing organizations develop comprehensive disaster staffing plans to protect buildings, engage residents and continue business operations in the event of a disaster. The Ready to Respond: Disaster Staffing Toolkit is based on the Incident Command System (ICS), a planning framework used by federal, state and local first responders to help with command, control and coordination of disaster response.

By using the toolkit to develop a disaster staffing plan, your housing organization will be able to:

- Minimize building damage and ensure quick return to service
- Support the safety, preparedness and recovery of residents
- Maintain key business operations throughout a disaster

*To read the rest of the article, [click here](#).*

*For more information, please visit <https://www.hud.gov/info/disasterresources>.*

## HUD Expedites Process for Reviewing Relief Requests for Hurricane-Affected Areas

The Department of Housing and Urban Development (HUD) recently published a Notice in the *Federal Register* entitled, "Relief From HUD Requirements Available to PHAs To Assist With Recovery and Relief Efforts on Behalf of Families Affected by Hurricanes Harvey, Irma, Maria and Future Natural Disasters Where Major Disaster Declarations Might Be Issued in 2017." The Notice provides information on an expedited process for reviewing requests for relief from several HUD requirements for public housing agencies (PHAs) and tribes or tribally designated housing entities (TDHEs) in Texas, the U.S. Virgin Islands, Puerto Rico, Florida, and Georgia. PHAs and tribes/TDHEs in those areas that were affected by hurricanes Harvey, Irma and Maria, may request waivers of HUD requirements and receive expedited review of their requests for the remainder of 2017.

For more information, please visit [www.hud.gov/hurricane](http://www.hud.gov/hurricane).

## RD Has Options for Borrowers Affected by Hurricanes

Rural Development (RD) is concerned for both Multi-family Housing (MFH) borrowers and individuals affected by the recent Hurricanes. They have a number of options available to both MFH borrowers and individuals. These options include allowing for MFH borrowers to delay making their mortgage payments while their properties are unoccupied due to damage. For individuals that may need housing, they allow for individuals to receive a letter of priority which allows them to be placed at the top of MFH properties waiting lists.

Below is a summary of the waivers allowed once the President declares a disaster:

### FOR BORROWERS

1. State Offices may waive overage and late fees due to communication issues for submitting tenant certifications and payments.
2. Allow for appropriate workout plan that may include reducing contributions to reserve accounts or lowering loan payments.
3. Allow for borrowers to make a good faith effort to repair units while interest credit remains in effect.

### FOR INDIVIDUALS

1. Applicants may receive a Letter of Priority Entitlement (LOPE) issued by USDA Rural Development or may provide the property owners with documentation of being registered with the FEMA in lieu of a LOPE letter.
2. If an applicant does rent in a Rural Development-financed property, the FEMA registration number must be entered into Multi-Family Information System (MFIS). Within 90 days, field staff will need to conduct a random sampling of tenant files to assure that the FEMA data was input into MFIS correctly. (see the HB for further guidance)
3. Allow for imputed income from assets due to homeownership affected by the disaster.
4. Zero income applicants will be allowed to reside in apartment units; rental assistance, if Available at the property, will be made available to the applicant;
5. Collection of security deposits per 7 CFR 3560.204 may be waived, if requested by the owner of the property.
6. Owners of elderly-designated properties may rent to age-ineligible applicants for 6 months from the date of the State Director decision.
7. The annual lease required per 7 CFR 3560.156 (b)(2) is waived and leases may be issued on a month-to-month basis.

To view the complete list of instructions once a disaster has been declared, ***Special Procedures for Declared Disasters***, [click here](#).

## FHA Disaster-Related Policy Waivers Issued for Presidentially-Declared Major Disaster Areas in Puerto Rico and California

The Federal Housing Administration (FHA) has issued waivers of its policy on the timeframe for completing the inspection of properties prior to closing or submitting the mortgage for FHA insurance endorsement in the Presidentially-Declared Major Disaster Areas in certain municipalities in Puerto Rico impacted by Hurricane Maria (Maria) and certain counties in the state of California impacted by wildfires (Wildfires).

For mortgages in process secured by properties in a PDMDA that have not closed or are pending endorsement, mortgagees must follow the guidance contained in the Single-Family Housing Policy Handbook 4000.1 (SF Handbook) Section II.A.7.c, Inspection and Repair Escrow Requirements for Mortgages Pending Closing or Endorsement in Presidentially-Declared Major Disaster Areas. FHA's current policy requires that a damage inspection be performed following the close of the Incident Period as defined by the Federal Emergency Management Agency (FEMA).

FHA believes that the situations in certain municipalities Puerto Rico and certain counties in California have stabilized to the extent that further

damage to the properties appear unlikely, despite FEMA not having closed its Incident Period for the PDMDAs in these two areas. However, mortgagees should continue to monitor FEMA's website to ascertain the latest information on these PDMDAs as additional municipalities or counties could be added to them until the Incident Periods have closed.

As a result, FHA issued two waivers: one for certain municipalities in Puerto Rico (Maria) and the other for certain counties in California (Wildfires), regarding the timing of the required inspection, allowing damage inspections to be completed beginning October 24, 2017 for the PDMDAs in Puerto Rico and California.

These waivers do not affect mortgagees' obligations to exercise prudent lending practices and ensure that mortgages they submit for endorsement fully comply with FHA's property eligibility requirements, as well as any property condition requirements related to claims processing. Mortgagees can find more information about FHA's PDMDA policies, as well as the 203(h) Mortgage Insurance for Disaster Victims Program and the 203(k) Rehabilitation Mortgage Insurance Program, on the FHA Resource Center's Online Knowledge Base.

Quick Links:

- [View both waivers](#)
- Access the SF Handbook in online or portable document format from [HUD's Client Information Policy Systems Handbooks web page](#)
- View the status of Incident Periods on the [FEMA Disasters web page](#)



## USDA Foreclosure Moratoriums Extended for Hurricane Areas

The United States Department of Agriculture (USDA) is extending the moratoriums on property foreclosures in the Presidentially Declared Disaster (PDD) areas impacted by Hurricanes Harvey, Irma and Maria. In light of the severity of the damage caused by the storms, the foreclosure moratoriums will be extended until the dates indicated below:

- Hurricane Harvey: February 21, 2018
- Hurricane Irma: March 9, 2018

## Low-Income Housing Units May be Offered to Hurricane Victims

The Internal Revenue Service distributed the following release regarding low-income residents displaced by the recent natural disasters.

**IR-2017-165** –The Internal Revenue Service has provided temporary relief from certain requirements of the Internal Revenue Code to allow owners and operators of low-income housing projects located anywhere in the United States and its possessions to provide temporary emergency housing to individuals who are displaced by a major disaster from their principal residences, regardless of income.

This special relief detailed in Revenue Procedure 2014-49 and Revenue Procedure 2014-50 authorizes owners and operators, in conjunction with agencies and issuers, to disregard the income limits, transience rules and certain other restrictions that normally apply to low-income housing units when providing temporary emergency housing to displaced individuals. As a result, owners and operators can offer temporary emergency housing to displaced individuals who lived in a county or other local jurisdiction designated for individual assistance by the Federal Emergency Management

- Hurricane Maria: March 19, 2018

These extensions apply to new foreclosures as well as foreclosures already initiated. USDA guidance outlined in "Assistance in Natural Disasters" and located in Chapter 18 Section 4, 7 CFR 3555.307 of the SFHGLP Handbook requires an initial moratorium on foreclosure actions within a PDD for ninety days following the date of each PDD declaration. The extensions are intended to provide greater relief to homeowners in the PDD areas. If you have any questions, please contact the USDA Rural Development Customer Service Center at (866) 550-5887 or the National Office at (202) 720-1452.

Agency (FEMA). Currently, this includes parts of Texas, Florida, Georgia, Puerto Rico and the U.S. Virgin Islands, though FEMA may add other locations in the future. Upon approval, emergency housing can be provided for up to a year after the close of the month in which the major disaster was declared by the President.

This relief automatically applies as soon as the President declares a major disaster and FEMA designates any locality for individual or public assistance. For that reason, individuals affected by some other recent major disasters, including those affecting parts of Michigan, West Virginia and other localities, may also qualify for emergency housing relief. For a list of recent disasters, see the disaster relief page on [www.irs.gov](http://www.irs.gov).

Although owners and operators of low-income housing projects are allowed to offer temporary housing to qualified disaster victims, they are not required to do so. Details on other hurricane-related tax relief are available at [www.irs.gov/hurricaneharvey](http://www.irs.gov/hurricaneharvey) and [www.irs.gov/hurricaneirma](http://www.irs.gov/hurricaneirma).

For information on government-wide relief efforts, visit [www.usa.gov/hurricane-harvey](http://www.usa.gov/hurricane-harvey) or [www.usa.gov/hurricane-irma](http://www.usa.gov/hurricane-irma).

Reprinted from [www.irs.gov/newsroom](http://www.irs.gov/newsroom).

## Hurricane Disaster Relief for LIHTC Properties

By *Kristen Hand, CPA, Bernard Robinson*

The 2017 Hurricane Season has been destructive and devastating to many communities. According to Moody's Analytics, Hurricanes Harvey, Irma, Jose and Maria caused approximately \$200 billion in damages. For Low Income Housing Tax Credit ("LIHTC") Projects that are in presidentially declared disaster areas, the IRS has granted temporary relief from several compliance requirements as outlined in Revenue Procedures 2014-49 and 2014-50.

### Relief for Carryover Allocations:

For owners with carryover allocations in major disaster areas, the State Allocating Agency ("Agency") may grant the owner an extension for the 10-percent basis requirements for up to six months, if the disaster occurred prior to the deadline.

### Recapture Relief:

Property owners will not be subject to recapture due to casualty losses from a major disaster, if the loss is restored within a reasonable time, as determined by the Agency. Additionally, credits may be taken during the restoration period, using the building's qualified basis at the end of taxable year immediately preceding the first day of the incident period for the major disaster.

### Compliance Monitoring Relief:

An Agency may extend the due date for scheduled compliance reviews for up to one calendar year from the date of the building's restoration.

### Buildings in the First Year of the Credit Period:

For buildings that are severely damaged, destroyed or determined uninhabitable, the Agency may elect to treat the allocation as a returned credit, or they may toll (delay) the beginning of the first year of the credit period. However, owners may not claim any credits during the restoration period.

### Additional Credits for Rehabilitation Expenditures:

An owner may not receive additional credits to restore a building's qualified basis. However, additional credits may be allowed for rehabilitation expenditures - any expenditure that exceeds the amount expended for restoration. Details on how to compute amounts in excess of restoration expenditures may be found here.

### Housing Displaced Individuals:

The Agency may allow a Project to house displaced individuals. If the Project is in the first year of the credit period, the unit is treated as low-income when determining the Project's qualified basis or meeting the Project's 20-50, 40-60 or 25-60 test. For Projects outside of the first year, the unit will retain the status prior to housing the displaced individual.

To determine if your Project may qualify for these reliefs, please consult your State Housing Finance Agency or accounting professional.

Reprinted from the *Bernard Robinson & Company, LLP Newsletter, October 2017 issue*. For more information, please visit [www.brccpa.com](http://www.brccpa.com).

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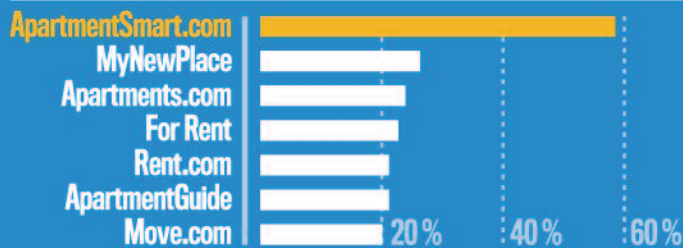


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## Report Finds Large Majority of Distressed Counties are Rural

The Distressed Communities Index, a recent report from the Economic Innovation Group, measures distress at the zip code and county level based on metrics including median income, poverty rate, and housing vacancy rate. Among the findings: “Nearly 98 percent of distressed counties have fewer than 100,000 people and 90 percent have fewer than 50,000 people, making them overwhelmingly rural”; “distress is mainly urban in the Northeast and rural in the South, but prosperity tends to be suburban in every region.” Interactive maps are also available online.

Reprinted from the Housing Assistance Council Newsletter, October 23, 2017 issue. For more information, please email [hac@ruralhome.org](mailto:hac@ruralhome.org).

## Far From Static, Rural Home Prices are Dynamic and Growing in Most of the Country

by Alexander Hermann, Research Assistant, Harvard Joint Center for Housing Studies

While many believe that home prices in rural areas are largely stagnant, this is not the case, according to a new Joint Center analysis from the Federal Housing Finance Agency (FHFA). Rather, non-metro home prices are dynamic, highly variable, and growing—much like home prices for the nation as a whole.

Nationally, home prices grew significantly over the last half-decade, following years of decline in the aftermath of the housing crisis. But these broad indicators mask significant variation by region, market, and even neighborhood. While these trends were discussed extensively in this year’s State of the Nation’s Housing report and on our blog, those analyses focused almost exclusively on the roughly 62 million homeowners living within metropolitan areas, where 83 percent of the country’s owner-occupied units are located.

But what about home prices in the largely rural, non-metro areas that are home to about 15 percent of the population? Due to limited data availability, these areas often are ignored in discussion about trends in home prices. A new Joint Center analysis of the FHFA House Price Index, which measures price changes from the sale, refinancing, and appraisal of the same properties, seeks to fill this gap. In particular, the analysis examined house prices for all counties outside of Metropolitan Statistical Areas (MSAs). (Metro-area counties are those that contain an urbanized area of at least 50,000 persons plus any adjoining counties that commuting patterns show are economically integrated with their metropolitan neighbors.)

Several key findings emerge from this analysis, most notably:

- **Rather than stagnating, home prices outside the metropolitan areas grew considerably between 2000 and 2016.** In nominal terms, non-metro home prices grew 58 percent and real non-metro home prices grew nearly 15 percent. Moreover, by the fourth quarter of 2016, nominal non-metro and rural home prices were two percent above their pre-recession peak—the same as national home prices at

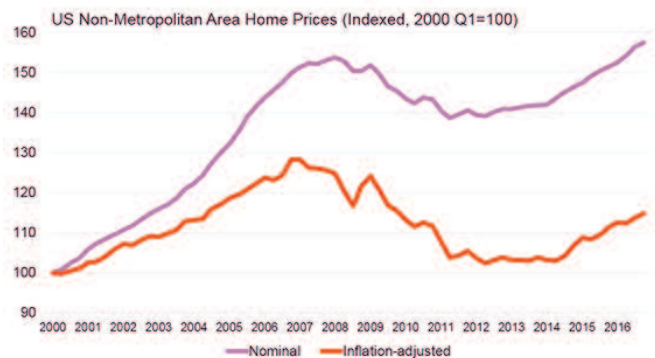
## Social Scientists Consider “Rural Poverty in America”

On October 19, the American Enterprise Institute and the American Academy of Political and Social Science hosted a panel discussion on rural poverty, now archived online. The July 2017 issue of the AAPSS Annals addresses “The New Rural-Urban Interface,” with articles covering ethnoracial, diversity, economic conditions, upward mobility of low-income youth, long-term poverty trends, political polarization, education, and more.

Reprinted from the Housing Assistance Council Newsletter, October 23, 2017 issue. For more information, please email [hac@ruralhome.org](mailto:hac@ruralhome.org).

the same point. However, when adjusted for inflation, home prices in non-metro areas were still 11 percent below their peak, which again, is somewhat similar to national patterns (Figure 1).

**Figure 1: Outside of Metropolitan Areas, Home Prices Are Back Above Past Peaks Nominally, but not After Adjusting for Inflation**



Note: The US non-metro index is a weighted-average of state non-metro HPIs, with each state's value weighted by its share of non-metro detached single family housing units. Real home prices are adjusted for inflation using the CPI-U for All Items less shelter.

Source: JCHS tabulations of the Federal Housing Finance Agency, All-Transactions House Price Index.

- **While significant, these increases were more modest than the gains experienced by the nation as a whole.** Nationally, real home prices grew 23 percent in 2000-2016, about 8 percentage points more than prices in non-metro areas (Figure 2). The difference is largely due to the more modest cyclicity of non-metro home prices movements during and after the recession. In the immediate aftermath of the

—continued on page 30

## News Links

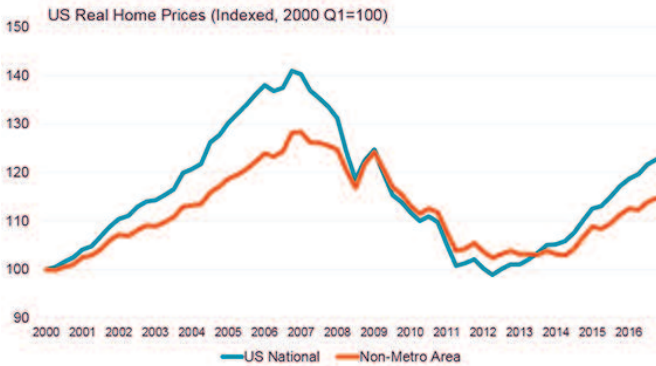
### Affordable Housing Headlines

Get the latest news that affects your business at [www.carh.org](http://www.carh.org). We gather breaking news from the *Washington Post*, *The Hill News*, the *Wall Street Journal*, the *New York Times* and more, and deliver it to you on our home page each day.

—continued from page 29

housing crisis, national home prices fell severely for several years before starting to rise steadily in early 2012. In contrast, home prices in non-metro areas were mostly stagnant from 2011 to 2014, and, compared to metro areas, have grown less quickly since. As a result, between 2012 and 2016, the percentage-point increase in non-metro home prices was greater than the percentage-point increase in statewide prices only in Alaska, Hawaii, Mississippi, Montana, and Nebraska.

**Figure 2: Home Price Growth Outside of Metro Areas Has Been More Moderate than Price Growth for the Nation as a Whole**



*Note: The US non-metro index is a weighted-average of state non-metro HPIs, with each state's value weighted by its share of non-metro detached single family housing units. Real home prices are adjusted for inflation using the CPI-U for All Items less shelter.*

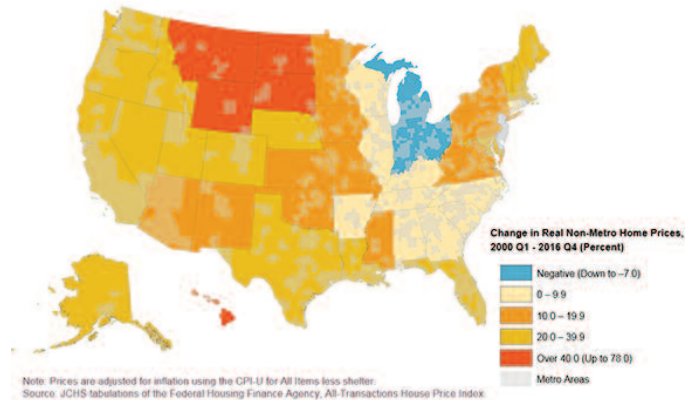
*Source: JCHS tabulations of the Federal Housing Finance Agency, All-Transactions House Price Index.*

- **Rural home price trends by state vary widely.** While non-metro home prices within states generally change in ways that are similar to the broader state-wide trends, increases in rural areas did not always trail overall increases in their states (**Figure 3**). Rather, from 2000 to 2016, the increase in non-metro house prices actually exceeded statewide prices increases in 24 of the 47 states where at least some part of the state was not in an MSA. (Three states—Delaware, New Jersey, and Rhode Island—do not have non-metro areas.)

The gaps were largest in North Dakota (13 percentage points greater), Nebraska (12 percentage points greater), South Dakota (11 percentage points greater), New Mexico (7 percentage points greater), and Louisiana (6 percentage points greater). In contrast, the increases in statewide prices most exceeded rural prices in coastal states, where prices in metropolitan areas have grown significantly. The gaps were

greatest in California (26 percentage points), Hawaii (23 percentage points), Virginia (22 percentage points), Oregon (19 percentage points), and Maryland (18 percentage points).

**Figure 3: Non-Metro Home Price Growth Has Varied Widely by State**



- **Non-metro home prices rose more slowly in the run-up to the housing crisis, and rarely fell as far in the aftermath.** Between 2000 and 2007, real non-metro home prices increased by 28 percent, far less than the 41 percent increase for all single-family homes. However, in about half of the 47 states with non-metro areas, the percent increase for all single-family homes. However, in about half of the 47 states with non-metro areas, the percent increase in non-metro home prices exceeded states-wide home-price gains in the run-up to peak. After the crash, real national home prices fell below 2000 levels briefly in 2012, while non-metro prices remained about three percent above their 2000 levels. Moreover, this pattern held true in most states. In only 10 of 47 states were the recessionary-low home prices (relative to 2000) in non-metro areas lower than for the state overall.
- **Unclear signals for the future.** While this analysis shows that non-metro house prices generally follow national patterns, since the recession price growth in rural areas has been slower than in the nation as a whole. The homeownership rate in non-metro areas was also about 71 percent in 2015, nearly 9 percentage points higher than in metro areas. These differences held across racial and ethnic groups, as well as for low- and moderate-income households. Collectively, this indicates that these markets merit close attention in the coming years.

*Reprinted from the Harvard Joint Center for Housing Studies. For more information, please visit [www.jchs.harvard.edu](http://www.jchs.harvard.edu).*

## Welcome New CARH Members!

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### Michigan Asset Group

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517-643-5015  
Contact: Evert Kramer  
evert@miasset.com

## America's Rental Housing Report to be Released December 14 The Newseum, Washington, DC

The Harvard Joint Center for Housing Studies will release its 2017 America's Rental Housing report with an event and live webcast from The Newseum in Washington, DC on Thursday, December 14.

Demand for rental housing in the US has grown over the past decade, with a particular increase in demand from older adults and high-income households. Tight rental markets, however, present challenges for low- and moderate-income renters who face rising rents, low vacancy rates, and widespread cost burdens. Our 2017 report shows that addressing the challenges facing renters—particularly low-income renters—requires bold leadership and hard choices from both the public and private sectors.



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# CARH'S Legislative Update

On May 23, 2017, the Trump Administration released the FY 2018 proposed budget. The process of moving the appropriations bills through Congress has begun. CARH will update this chart throughout the year. A short-term Continuing Resolution (CR) has passed which funds the government through December 8<sup>th</sup>.

SUBJECT	ADMINISTRATION'S PROPOSAL	CARH'S POSITION
Section 515 Rural Rental Housing Program	The Trump Administration proposed elimination of the Section 515 program.	CARH strongly opposes the proposed elimination of the Section 515 program and supports the FY17 funding level of \$35 million.
Section 521 Rental Assistance Program (1-year contracts)	The Trump Administration proposed \$1.345 billion for Section 521	CARH strongly opposes the proposed funding level of \$1.345 billion and supports the FY17 approved funding level of \$1.405 billion. CARH continues to support hearings on a host of programs administered by RHS.
Section 538 Guaranteed Rural Rental Housing Loan Program	The Trump Administration proposed \$250 million for Section 538.	CARH supports the request of \$250 million.
Low Income Housing Tax Credit (Housing Credit)	The Protecting Americans from Tax Hikes Act (PATH) of 2015 permanently extended the minimum 9 percent Housing Credit rate for new construction and substantial rehabilitation.	The Protecting Americans from Tax Hikes Act (PATH) of 2015 did not establish a minimum 4 percent credit rate for acquisitions. CARH supports this minimum rate. CARH also supports efforts of the ACTION campaign for a Housing Credit cap increase.
Section 502 Direct Loans	The Trump Administration proposed elimination of the Section 502 Direct Loan program.	CARH strongly opposes the elimination of the Section 502 Direct Loan program and supports the FY17 funding level of \$1 billion.
Section 502 Guaranteed Loans	The Trump Administration proposed \$24 billion for Section 502 Guaranteed Loans.	CARH supports the request of \$24 billion.
Multifamily Preservation and Revitalization (MPR) Program	The Trump Administration proposed elimination of the MPR program.	CARH strongly opposes the elimination of the MPR program and supports the FY17 funding level of \$22 million and \$19.4 million for Section 542 vouchers.
HOME	The Trump Administration proposed elimination of the HOME program.	CARH strongly opposes the elimination of the HOME program and supports the FY17 funding level of \$950 million.
Section 8 (Project Based Rental Assistance)	The Trump Administration proposed \$10.351 billion for Section 8.	CARH supports the FY17 funding level of \$10.826 billion.
Section 8 (Tenant Based Rental Assistance (Vouchers))	The Trump Administration proposed \$19.318 billion for Section 8 Vouchers.	CARH supports the FY17 funding level of \$20.292 billion.
Community Development Fund (CDBG)	The Trump Administration proposed elimination of the CDBG program.	CARH strongly opposes the elimination of the CDBG program and supports the FY17 funding level of \$3.060 billion.
Public Housing Capital Fund	The Trump Administration proposed \$628 million for the Public Housing Capital Fund.	CARH supports the FY17 funding level of \$1.942 billion.
Public Housing Operating Fund	The Trump Administration proposed \$3.9 billion for the Public Housing Operating Fund.	CARH supports the FY17 funding level of \$4.4 billion.



# CARH'S Legislative Update

HOUSE ACTION	SENATE ACTION	CONFERENCE/FINAL ACTION
The House Appropriations Committee has recommended \$28.4 million (H.R. 3268).	The Senate Appropriations Committee has recommended \$35 million (S. 1603).	N/A
The House Appropriations Committee has recommended \$1.345 billion (H.R. 3268).	The Senate Appropriations Committee has recommended \$1.345 billion (S. 1603).	N/A
The House Appropriations Committee has recommended \$230 million (H.R. 3268).	The Senate Appropriations Committee has recommended \$230 million (S. 1603).	N/A
<p>H.R. 1661 was introduced by Representatives Tiberi and Neal on March 21, 2017, which is similar to S. 548. However, H.R. 1661 does not provide for an increase to the annual allocation for Housing Credits by 50%. Additionally, energy provisions regarding not reducing Housing Credit basis only includes Section 48 investment tax credits, not the Section 45L credit or Section 179D deduction that is included in S. 548.</p> <p>On October 31, Representative Suzan DelBene introduced H.R. 4185 that would increase the Housing Credit allocation by 50%.</p>	S. 548 was introduced by Senator Cantwell on March 7, 2017, and establishes a minimum 4% credit rate, allows income-averaging, modifies student occupancy rules, allows states to grant a 30% basis boost if necessary to make project financially feasible and renames to the Affordable Housing Tax Credit.	
The House Appropriations Committee has recommended \$900 million (H.R. 3268).	The Senate Appropriations Committee has recommended \$1 billion (S. 1603).	N/A
The House Appropriations Committee has recommended \$24 billion (H.R. 3268).	The Senate Appropriations Committee has recommended \$24 billion (S. 1603).	N/A
The House Appropriations Committee has recommended \$15 million for MPR and \$20 million for Section 542 vouchers (H.R. 3268).	The Senate Appropriations Committee has recommended \$22 million (S. 1603).	N/A
The House Appropriations Committee has recommended \$850 million (H.R. 3353).	The Senate Appropriations Committee has recommended \$950 million (S. 1655).	N/A
The House Appropriations Committee has recommended \$11.082 billion (H.R. 3353).	The Senate Appropriations Committee has recommended \$11.507 billion (S. 1655).	N/A
The House Appropriations Committee has recommended \$20.487 billion (H.R. 3353).	The Senate Appropriations Committee has recommended \$21.365 billion (S. 1655).	N/A
The House Appropriations Committee has recommended \$2.9 billion (H.R. 3353).	The Senate Appropriations Committee has recommended \$3 billion (S. 1655).	N/A
The House Appropriations Committee has recommended \$1.850 billion (H.R. 3353).	The Senate Appropriations Committee has recommended \$1.945 billion (S. 1655).	N/A
The House Appropriations Committee has recommended \$4.4 billion (H.R. 3353).	The Senate Appropriations Committee has recommended \$4.5 billion (S. 1655).	N/A

# RealPage Releases

## Rural Housing Combo Product

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RealPage, Inc., a leading provider of on-demand software and services to the multifamily industry, has released its new web-based rural housing system, OneSite Leasing & Rents Rural Housing.

The system, which supports the Rural Development (RD) Section 515 program, is available in a combo package with OneSite Leasing & Rents Affordable HUD and OneSite Leasing & Rents Tax Credits, providing owners of affordable properties a full solution for administering multiple subsidy portfolios. A standalone version of the system is also available.

OneSite Leasing & Rents Rural Housing incorporates easy-to-use tools to gather and process resident data accurately, and automate and streamline certification processing, MINC electronic submissions, and project worksheet reporting. Property owners and managers can access the system 24 hours a day, seven days a week through the Internet and secure passwords.

“Rural Housing is the newest addition to our Affordable suite of products,” said Ranjeev Teelock, vice president of affordable housing for RealPage. “The system integrates seamlessly with our existing HUD and Tax Credits products, providing a complete solution for compliance monitoring and reporting with all government regulations.”

Features of OneSite Leasing & Rents Rural Housing include:

- Ability to set up multiple RD project types and associate units to different projects
- Quick qualify tool that provides the ability to quickly determine eligibility of a prospect or applicant
- An interview wizard that simplifies the collection of household member and financial data
- A verification letter management system that provides a library of letters and notices
- Audit trail capabilities for every verification letter
- A certify wizard that provides step-by-step guidance for tasks
- Built-in RD regulations

OneSite is RealPage’s integrated, on-demand property management suite of products that automate the entire process of leasing, renting, and managing apartments. For more information on OneSite Leasing & Rents Rural Housing and other RealPage products and services, please call 1-87-REALPAGE or visit [www.realpage.com](http://www.realpage.com).

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## Upcoming Meetings

### ▶ NATIONAL CARH MEETINGS

#### 2018 Midyear Meeting

CARH's 2018 Midyear Meeting will be held on Monday, January 22 – Wednesday, January 24, 2018, at The Westin Verasa Napa in Napa, California. The 2017 Harry L. Tomlinson, Member of the Year and State Affiliated Association of the Year Awards will be presented. [Click here](#) to register.

#### 2018 Annual Meeting & Legislative Conference

CARH's Annual Meeting & Legislative Conference will be held Monday, June 18-Wednesday, June 20, 2018, at the Ritz-Carlton Pentagon City in Arlington, Virginia. The winners of the CARH Scholarship Foundation's 2018 Scholarships and Rural Development's Site Managers and Maintenance Person of the Year will be honored during this conference.

### ▶ STATE AFFILIATED ASSOCIATION AND PARTNER MEETINGS FOR 2017

#### AHAIN 2017 Affordable Housing Conference and Annual Meeting

11/15-16/2017

The Affordable Housing Association of Indiana (AHAIN) will host its 2017 Affordable Housing Conference and Annual Meeting on November 15-16, 2017, at the Westin Indianapolis in Indianapolis, Indiana. Please contact Charyl Luth at 260-724-6492 or [cluth@inaha.org](mailto:cluth@inaha.org) for more information. Or, visit [www.inaha.org](http://www.inaha.org).

#### TAAH Annual Conference

11/16-17/2017

The Tennessee Association of Affordable Housing (TAAH) will host its Annual Conference on November 16-17, 2017, at the Embassy Suites in Franklin, Tennessee. Please contact Shannon Swims Mansfield at 573-359-7716 or [admin@taah.org](mailto:admin@taah.org) for more information. Or, visit [www.taah.org](http://www.taah.org).

### ▶ STATE AFFILIATED ASSOCIATION AND PARTNER MEETINGS FOR 2018

#### CCAH Annual Meeting & Conference

4/22-24/2018

The Carolinas Council for Affordable Housing (CCAH) will host its Annual Meeting & Conference on April 22-24, 2018, at the Myrtle Beach Marriott Grand Dunes Resort in Myrtle Beach, South Carolina. Please contact Nancy Cross at 919-774-7713 or [ccahboard@aol.com](mailto:ccahboard@aol.com). Or, visit [www.ccahonline.com](http://www.ccahonline.com) for more information.

#### Midwest Rural Housing Conference

5/14-16/2018

The Council for Rural Housing and Development of Ohio (CRHDO) will host the Midwest Rural Housing Conference on May 14-16, 2018, at the Hilton Polaris/Columbus in Columbus, Ohio. Please contact Patrica Richards at 614-470-4260 or [office@crhdo.org](mailto:office@crhdo.org) for more information. Or, visit [www.chrdo.org](http://www.chrdo.org).

#### VCARH 2018 Annual Meeting

5/20-22/2018

The Virginia Council for Affordable and Rural Housing (VACARH) will host its Annual Meeting on May 20-22, 2018, at the Stonewall Jackson Hotel and Conference Center in Staunton, Virginia. Please contact Sandra Lux at 804-674-5162 or [vcarh@comcast.net](mailto:vcarh@comcast.net) for more information.

#### AAHA Annual Conference

5/22-25/2018

The Alabama Affordable Housing Association (AAHA) will host its Annual Conference on May 22-25, 2018, at the Hilton Sandestin Beach Golf Resort & Spa in Destin, Florida. Please contact Arrice Faught at 205-758-1158 or [arrice@theaaha.org](mailto:arrice@theaaha.org) for more information. Or, visit [www.theaaha.org](http://www.theaaha.org).

#### RRHA TX 40th Annual Convention and Trade Show

7/17-19/2018

The Rural Rental Housing Association of Texas (RRHA TX) will host its 40th Annual Convention and Trade Show on July 17-19, 2018, at the Omni Corpus Christi Hotel in Corpus Christi, Texas. Please contact Royce Ann Wiggins at 254-778-6111 or [office@rrhatx.com](mailto:office@rrhatx.com) for more information. Or, visit [www.rrhatx.com](http://www.rrhatx.com).

#### Ohio Rural Housing Conference

9/10-12/2018

The Council for Rural Housing and Development of Ohio (CRHDO) will host the Ohio Rural Housing Conference on September 10-12, 2018, at the Embassy Suites Dublin in Dublin, Ohio. Please contact Patrica Richards at 614-470-4260 or [office@crhdo.org](mailto:office@crhdo.org) for more information. Or, visit [www.chrdo.org](http://www.chrdo.org).

#### MRDC Annual Meeting & Training

10/3-4/2018

The Michigan Rural Development Council (MRDC) will host its Annual Meeting & Training on October 3-4, 2018, at the Soaring Eagle Casino & Resort in Mt. Pleasant, Michigan. For more information, please contact Kathy McCarthy at [kmccarthy@mirdc.org](mailto:kmccarthy@mirdc.org) or Katrina Greeley at [kgreeley@mirdc.org](mailto:kgreeley@mirdc.org). Both can also be reached at 517-347-9665. Or, visit [www.mirdc.org](http://www.mirdc.org).

#### MNCARH Conference

10/4/2018

The Minnesota Council for Affordable and Rural Housing (MNCARH) will host its 2018 Conference on October 4, 2018, at the Mystic Lake Hotel & Casino in Prior Lake, Minnesota. Please contact Allison Peterson at [mncarh@gmail.com](mailto:mncarh@gmail.com) or 800-944-3078 for more information. Or, visit [www.mncarh.com](http://www.mncarh.com).

#### FLCARH Annual Meeting

10/8-10/2018

The Florida Council for Affordable and Rural Housing (FLCARH) will host its 2018 Annual Meeting on October 8-10, 2018, at the Sheraton Sand Key Resort in Clearwater, Florida. Please contact Kevin Flynn at 727-449-1182 or [kflynn@flynnmanagement.com](mailto:kflynn@flynnmanagement.com) for more information. Or, visit [www.flcarh.org](http://www.flcarh.org).

#### HAM Annual Convention and Training Seminar

10/24-26/2018

The Housing Association of Mississippi (HAM) will host its 2018 Annual Convention and Training Seminar on October 24-26, 2018, at the Beau Rivage Resort & Casino in Biloxi, Mississippi. Please contact Ettie Pittman at 601-955-2942 or [housingms@yahoo.com](mailto:housingms@yahoo.com) for more information. Or, visit [www.ham-inc.org](http://www.ham-inc.org).

#### WI-CARH 21st Annual Conference

11/8/2018

The Wisconsin Council for Affordable and Rural Housing (WI-CARH) will host its 21st Annual Conference on November 8, 2018, at the Kalahari Resort & Convention Center in Wisconsin Dells, Wisconsin. Please contact Diane Hamm at 608-437-2300 or [info@wicarh.org](mailto:info@wicarh.org) for more information. Or, visit [www.wicarh.org](http://www.wicarh.org).

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## CARH news

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The Council for Affordable and Rural Housing (CARH) is a non-profit association that was founded in 1980. For over 35 years, CARH has served as the nation's leading advocate for the financing, development, and management of affordable rural housing. There is no other association that solely represents the needs of the rural housing industry and its participants, which include owners, developers, managers, non-profits, housing authorities, syndicators, accountants, architects, attorneys, bankers, and vendors to the industry. For more information about the benefits CARH provides to its members, including savings, networking, continued education, resources, and meetings, please visit [www.carh.org](http://www.carh.org).

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