



# NEW ENGLAND HOUSING NETWORK

c/o Citizens' Housing and  
Planning Association

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May 7, 2020

Congresswoman Ayanna Pressley  
1108 Longworth House Office Building  
Washington, DC 20515

## **Re: Needed Regulatory and Statutory Actions in COVID-19 Response**

Dear Congresswoman Pressley:

I am writing on behalf of the New England Housing Network (NEHN), a broad coalition of affordable housing organizations from each of the New England states (Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island, and Vermont). Created in 1995, the Network was the first organization to leverage the political diversity of our region in order to advocate for a broad range of affordable housing issues, no matter who is in leadership.

NEHN understands the U.S. Department of Housing and Urban Development (HUD), the U.S. Department of Agriculture (USDA) and other federal agencies are working to grant regulatory waivers and issue guidance for flexible uses of funding for its various programs. Additional regulatory relief is needed to adequately allocate funding from the CARES Act and the FY20 budget towards the hardest hit communities in our states. NEHN urges Congress to consider all of the National Low Income Housing Coalition's recommended regulatory actions including the following New England priorities:

**Disperse CoC NOFA competition funding and extend ESG RA time limits:** The COVID-19 crisis has highlighted our states' challenges in assisting populations experiencing homelessness, including the safety of our shelters. Additional flexibility for our communities is needed to prevent the spread of the virus and facilitate the homeless assistance programs. As such, NEHN urges HUD to allocate the FY20 Continuums of Care (CoC) Notice of Funding Availability (NOFA) competition funding and automatically provide renewal funding to all recipients funded under the FY19 competition without the need for an extended renewals process. Further, NEHN urges Congress to request that HUD waive time limits on Emergency Solutions Grants' (ESG) rental assistance, utility payments, and service costs to ensure greater housing stability.

**Waive the 3-month rental assistance limit for CDBG:** The COVID-19 crisis may continue indefinitely causing a slow recovery for both employers and employees. If a more permanent source of rental assistance is not made available by Congress soon, additional waivers are needed for current programs that can be used for rental assistance. As such, NEHN urges HUD to waive the 3-month limitation on the use of CDBG funding for temporary rental, mortgage, and utility assistance.

**Extend key National Housing Trust Fund deadlines:** The National Housing Trust Fund (HTF) helps create and preserve housing for those with the lowest incomes and those experiencing homelessness. NEHN requests that the following HTF waivers be implemented: 1) Extend the commitment deadline for HTF awards from 2-years to 3-years and make the change permanent for all future awards; 2) Extend the 5-year expenditure deadline for HTF funds by at least 1-year; and 3) Establish a 12-month moratorium on all onsite monitoring of rental assistance with HTF. Grantee waivers should also be provided for document review requirements if the grantees self-certify that they are unable to access applicable documents due to social distancing requirements.

New England Housing Network Lead Agencies

Citizens' Housing and Planning Association / Connecticut Housing Coalition / Housing Action New Hampshire  
HousingWorks RI / Maine Affordable Housing Coalition / Vermont Affordable Housing Coalition



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**Quarterly operating cost allocations and voucher cap waiver for public housing:** Public Housing Authorities (PHA's) across New England are dealing with rental revenue shortages and are struggling to adequately address cleaning and safety issues during the COVID-19 crisis. While the CARES Act investment in public housing is helpful, additional waivers are needed to allow PHA's to properly address this crisis. As such, NEHN requests that public housing operating funds be distributed on a quarterly basis, rather than monthly. Further, NEHN requests that a waiver be provided to remove the cap on the number of vouchers PHA's can issue.

**Additional HUD and USDA tenant protections:** Many New England tenants are facing economic, healthcare, and housing security during this crisis. Additional program waivers are needed to fully protect the housing and rent security of all HUD and USDA assisted and public housing tenants. As such, NEHN requests the following waivers for tenants:

- **Expedite interim income re-certifications for HUD and USDA residents** experiencing job loss or reduced wages, including residents in McKinney-Vento supportive housing and rapid re-housing.
- **Suspend policies that restrict the ability of PHAs and owners to adjust tenant contributions for rent** based on job loss or reduced wages. HUD and USDA should provide additional assistance to smaller PHAs and owners that may have difficulty in recertifying quickly.
- **Suspend terminations for work, community service and self-sufficiency requirements.**
- **Institute a moratorium on tenant relocations** based on Choice Neighborhood Initiatives, Rental Assistance Demonstration (RAD), and other public housing redevelopment unless relocation is within the same building or property that is deemed safe by local health officials.
- **Grant immediate hardship consideration to any household self-reporting job loss or reduced wages** as a result of the COVID-19 crisis.

**Additional flexibility for seasonal workers:** Many residents have more than one job or occupation, but are considered seasonal workers. Our local CDBG administrators planned to launch job creation and retention programs with CDBG funds. However, CDBG only allows seasonal workers to be considered permanent employees if the duration of the season is long enough for the job to be considered a person's principal occupation. As such, NEHN requests additional flexibility be provided for CDBG to retain or create seasonal jobs.

Please support these additional regulatory waivers needed to deploy FY2020 budget allocations, supplemental CARES Act funding, and any subsequent federal COVID-19 stimulus packages flexibly. NEHN understands regulatory waivers are being announced on a rolling basis and therefore appreciates the release of any of these priority waivers by the time this letter was issued.

Sincerely,

Affordable Housing Alliance of Connecticut  
Community Housing of Maine  
Maine Affordable Housing Coalition  
Citizens' Housing and Planning Association  
Greater Worcester Community Foundation  
Metro Housing | Boston  
Regional Housing Network of Massachusetts  
Preservation of Affordable Housing

Housing Action New Hampshire  
Housing Network of Rhode Island  
HousingWorks Rhode Island  
Cathedral Square  
Housing Vermont  
Vermont Affordable Housing Coalition  
Vermont Housing & Conservation Board  
Windham & Windsor Housing Trust

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