



# Housing Alliance and Community Partnerships

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March 9, 2018

Dear Senator Crapo,

I would like voice my support, and the support of my agency, for S.2155; most specifically the portion pertaining to Small Housing Authority Reform found in Sec. 38. We believe this bill provides much needed relief from burdensome regulations that just don't make sense for small agencies.

Small PHAs pose lower risks than larger PHAs because the federal dollar investment is much lower per agency. Yet, small agencies are held to the same compliance standards as large agencies. These compliance standards are costly and administratively burdensome for these agencies with minimal staff and funding. Large agencies have entire departments staffed with employees who oversee compliance. In a small agency, compliance falls to the Executive Director who is already wearing many hats.

One example that comes to mind is the Environmental Review process. Currently HUD requires Environmental Reviews to be completed with every dollar of Capital Fund spent. This includes carpet or appliance replacement. Because many small agency Capital Fund expenditures are of this nature, the Environmental Review process makes no sense as the ground (environment) is not part of this work. Additionally, the time and energy spent in this process slows down important work. Furthermore, costs associated are taking away from those dollars actually being invested in improvements that benefit the residents. This issue is addressed in S.2155.

Admittedly, there is much more reform that is needed in order to help agencies maximize the federal dollars spent. This bill, and future reform, will help to insure that allocated funds are being spent to benefit and assist residents, not paying for a box to be checked on a bureaucratic form.

We applaud and thank Senator Crapo and the Banking Committee for the work that has been done on behalf of this bill. We encourage the Senate to recognize the importance of reform. Be bold and move this bill forward!

Best,

Sunny Shaw, CME, PHM  
Executive Director  
Housing Alliance and Community Partnerships  
(Previously the Housing Authority of the City of Pocatello)