



National Association of Residential Property Managers

December 2, 2022

Ms. Erika Poethig
Special Assistant to the President for Housing and Urban Policy
Executive Office of the White House
1600 Pennsylvania Avenue, NW
Washington, DC 20500

Dear Ms. Poethig:

Thank you for the opportunity to participate in last week's Zoom meeting regarding tenant-centered housing policies. We sincerely appreciate the invitation to be a part of the conversation and share our insight and perspective on these important issues.

I wanted to follow up with some thoughts that we hope you will consider as you go forward. First, I wanted to reiterate what was said by NARPM® and NAA participants in the meeting. In particular, I wanted to strongly encourage you to be especially sensitive to the effect that any proposed changes would have on small landlords, particularly those in the single-family rental market, a sector that is predominated by those who own 5 or less properties and in which even marginal changes can push significant numbers of landlords out of the marketplace.

On the issue of eviction, we would ask to understand that for us, eviction truly is a last resort when all other attempts to ensure lease compliance have failed. We also recognize, however, that eviction is a necessary tool to protect the interests of the property owner, address lease violations, and help ensure fairness and safety for other residents.

With that stated, we certainly understand, appreciate, and applaud the White House's interest in preventing evictions in the first place. To that end, please consider that the best way to approach the issue is to get at the root cause of evictions: the non-payment of rent. In fact, we stand ready to work with the Administration on realistic solutions that keep renters housed by ensuring that rental payments do not fall behind or that arrearages are quickly resolved: the ultimate win-win for landlords and tenants.

We believe that rental assistance is one of the most effective means of assisting renters who are at risk of eviction. Unlike solutions such as eviction moratoria or rent forgiveness, that put renters further into financial peril and/or push investors out of the market, rental assistance prevents evictions, and it protects renters and property owners.

There are several ways assistance programs can be constructed. From our perspective, such assistance should flow directly to the landlord on behalf of the renter, and the landlord should have the ability to apply for rental assistance on behalf of the renter. To the extent possible, the application and distribution of rental assistance should be as consistent as practical across the nation. In addition, rental assistance should not contain conditions that effectively force changes to landlord-tenant law.

In addition to rental assistance in the form of payments, we support the establishment of a refundable tax credit for landlords who forgive rent for renters in danger of eviction for non-payment of rent.

Also, we believe that the Housing Choice Voucher (HCV) program has an important place in the spectrum of housing supports that are provided to American families and that they play an important role in helping to deconcentrate poverty and afford more families an opportunity to live in neighborhoods of their choice. Moreover, NARPM recognizes that the HCV program also helps protect tenants from being trapped in substandard housing or exploitative circumstances.

NARPM also recognizes that there are legitimate concerns about the HCV program. Examples include the property inspection process, the required HAP contract that supersedes the landlord's standard lease; FMR's that are too low for a given area; the practice of withdrawing funds from the property manager without prior notice when a tenant is removed from the program; and the perceived apathy of program staff toward fraud or bad tenant behaviors, among other items.

Given the importance of the HCV program, we urge the Administration to work for meaningful changes to the program that address the legitimate concerns of landlords and others. This will encourage more participation in the program and build political support for additional investments in it.

A good starting point for HCV reform is the bipartisan, bicameral Choice in Affordable Housing Act (H.R.6880/S.1820), which includes the following:

- Authorizes the Department of Housing and Urban Development (HUD) to provide one-time incentive payments to landlords, security deposit payments, bonuses to public housing agencies that employ landlord liaisons, and amounts for other recruitment purposes.
- Allows dwelling units to meet Housing Choice Voucher program inspection requirements by satisfactory inspection through participation in other housing programs.
- Allows landlords not yet participating in a low-income housing assistance program to request inspection by a public housing agency to determine whether the dwelling meets requirements prior to selection by a tenant.

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- Expands the use of an alternative method of calculating fair market rent for purposes of the Housing Choice Voucher program and includes a hold-harmless clause for areas where FMR's would decline.

Again, thank you for the opportunity to share our views with you. If you have additional questions, please feel free to reach out to our Governmental Affairs Director Troy Garrett at tgarrett@narpm.org or at (202) 918-1134.

With kind regards, I am

Sincerely,

A handwritten signature in black ink that reads "Liz Cleyman". The signature is written in a cursive, flowing style.

Liz Cleyman, MPM[®] RMP[®]
NARPM[®] President