



January 13, 2019

The Honorable Jim Clyburn
House Democratic Whip
US House of Representatives
H-329, The Capitol
Washington, DC 20515

The Honorable Cory Booker
US Senate
717 Hart Senate Office Building
Washington, DC 20510

Dear Congressman Clyburn and Senator Booker:

The Council of State Community Development Agencies (COSCDA) is a national association representing state agencies on community development, housing, and homelessness issues. Our organization is sincerely appreciative of your leadership on affordable housing and efforts to address this important need. Specifically, your recent introduction of the HOME Act seeks to increase development of affordable housing units. The legislation's goal is well-intended however would add burdens to already understaffed state and local agencies. Ultimately, housing development depends upon market forces and until new resources are available, many localities will continue to be limited in their response.

The HOME Act would insert reporting requirements adding further strain on CDBG administration. CDBG administrators operate oftentimes with few staff and resources. For state CDBG programs, funds are administered through multiple sub-grantees which are primarily small and rural communities. Many states have dozens of active grants open at one time. Administrators currently do their best to navigate a host of program requirements including multiple environmental and labor regulations. Limited capacity exists to even carry out these responsibilities due to stagnant funding and a cap on administrative funds for states. Overall, the additional reporting requirements would slow administration and divert staff and resources from basic oversight responsibilities.

It is absolutely clear - federal response is desperately needed to increase the affordable housing stock. Programs such as CDBG, HOME Investment Partnerships (HOME), and Housing Trust Fund (HTF) have proven to preserve and produce units. Years of underinvestment though have left many communities with limited means to further affordable housing. Local reforms such as changes to zoning policies and tax credits for low-income persons may progress housing access, but only incrementally. Substantial public and private investment remains key to facilitating affordable housing developments.

COSCDA urges reconsideration of the legislation as proposed and recommends strengthening resources to support state and local housing initiatives. We offer our assistance in assessing proposals especially from a state perspective. Please reach out if we can provide any further information or clarification on the HOME Act or state efforts on affordable housing. Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Dianne E. Taylor". The signature is written in a cursive, flowing style with a prominent initial "D".

Dianne E. Taylor
Executive Director