



We help build homes and communities across rural America.

April 9, 2026

Scott H. Hutchins,
Under Secretary, Research, Education, and Economics Mission Area
Justin R. Benavidez,
Chief Economist, Office of the Chief Economist
U.S. Department of Agriculture
1400 Independence Avenue SW
Mail Stop 1800
Washington, DC 20250-1800

Re: **Docket No: ERS-2026-0001 - Request for Information on Opportunities, Challenges, and Emerging Areas in Statistical Data, Analysis, and Research at the U.S. Department of Agriculture**

Dear Under Secretary Hutchins and Chief Economist Benavidez:

The Housing Assistance Council (HAC) appreciates this opportunity to submit comments in response to the February 23, 2026, Request for Information on opportunities, challenges, and emerging areas in statistical data, analysis, and research at the U.S. Department of Agriculture.

HAC is a national nonprofit organization that helps build homes and communities across rural America. Since 1971, HAC has provided below-market financing for affordable housing and community development, technical assistance and training, research and information, and policy formulation to enable solutions for rural communities across the country. With more than 50 years of experience and commitment to providing research and data that help inform strategies and solutions for housing challenges across the nation, HAC is well-positioned to comment on data needs for rural communities.

HAC's comments to this Request for Information address selected knowledge gaps for rural markets and the nation as a whole. Our comments also seek to further USDA's strategic goals related to 1) the importance and utility of USDA data resources, 2) potential new data products, 3) data and research collaborations between USDA and other federal agencies and entities, 4) geographic units of analysis, and 5) new and emerging areas of research and data dissemination.

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HAC addresses the specific questions presented in the RFI below:

1. Which NASS or ERS data (e.g., releases, reports, datasets) are most valuable to your work, and why?

USDA’s Economic Research Service (ERS) is an immensely valuable institution and resource for rural America.

First and foremost, HAC wishes to reinforce the value and resources USDA’s Economic Research Service adds to rural communities and community-based organizations working every day to make rural America a better place to live. For decades, ERS has provided rigorous, objective, and accessible analysis that informs the economic and demographic realities shaping rural America.

ERS’s data and resources frequently provide the empirical foundation upon which sound research and policy are built. In a time when rural communities face both persistent challenges and new uncertainties, the value of ERS cannot be overstated. The Housing Assistance Council advocates for the continued resources and support to advance ERS’s important work, especially their research and products on the rural economy and population dynamics and trends.

3. What new topic areas should USDA prioritize for data products?

USDA should invest more in housing data and research.

The need to address the nation’s housing shortage is one policy issue that garners widespread support from across the spectrum. Housing characteristics, issues and trends ultimately impact housing production, availability, and affordability, which are undeniably among the greatest economic concerns in our nation today. Housing is an important aspect and catalyst for future growth and prosperity in any community, whether building new homes as a way to improve a declining town’s aging housing stock, or meeting the housing demands of workers in a recreational destination community where affordable homes are in short supply.

HAC encourages ERS, and USDA generally, to advance the collection and dissemination of data and resources that help researchers and communities working to build, preserve, and improve housing across the rural landscape of this country.

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19. Are there other data or analytical products or reports produced by other parts of USDA that you consider highly valuable, duplicative, or redundant? Are there any improvements that you would suggest to these data or analytical products or reports produced by other parts of USDA?

USDA ERS should expand its relationship with Rural Development and specifically the Rural Housing Service to provide increased and better data on housing resources the agency administers.

The U.S. Department of Agriculture’s Rural Housing Service (RHS) plays a vital and often underappreciated role in sustaining the fabric of rural America. By expanding access to safe, affordable housing through its loan, grant, and rental assistance programs, RHS stabilizes communities, supports local economies, and enables families to remain and thrive in rural places. In areas where private capital is limited and housing markets are thin or distressed, RHS serves as a cornerstone institution, ensuring that rural households have pathways to secure and adequate housing.

While RHS delivers programs on the ground, ERS provides invaluable analytical insight needed to understand the evolving economic and demographic conditions shaping rural housing needs. ERS’s research on population change, income dynamics, labor markets, and regional disparities offers critical context that can help RHS more effectively target its resources, anticipate emerging challenges, and evaluate program outcomes.

There have been past areas of coordination and research between the two service agencies. But stronger alignment between RHS and ERS would create important analyses informing more strategic program design and delivery by RHS. In turn, RHS’s program experience can highlight new areas and insights for ERS inquiry. This coordination would enhance evidence-based policymaking, improve the efficiency and impact of federal housing investments, and ultimately ensure that rural housing policy remains responsive to the real conditions facing rural communities.

Specifically, the Housing Assistance Council encourages USDA to provide greater data resources for the following issues and program areas:

USDA should provide more publicly available data to help inform strategies to address the “maturing mortgage crisis” within the Section 515 Rural Rental Housing Loan Program – especially data on why properties left the portfolio.

Rural communities are losing affordable rental housing at an alarming rate. One example of this phenomenon is the potential loss of rental housing from USDA’s Section 515 Rural Rental Housing portfolio. Relatively few Section 515 rental properties have been constructed in rural communities over the past few decades and many of the remaining properties are reaching maturity or are otherwise

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projected to leave the portfolio in the next few decades. The residual impacts of this trend are exponential. Once a Section 515 property leaves the portfolio, the property owner is generally no longer subject to government oversight or regulations on use of their property. These challenges are further exacerbated by a dearth of good quality rental housing in many rural communities.

One data resource that would be particularly useful is information on the reason why a Section 515 property left the portfolio (e.g., mortgage matured, foreclosure, prepayment, etc.) This information could provide greater insight into the performance and preservation of this critical housing resource.

Data on properties and residents that are leaving the USDA Section 515 rental stock is vital to preservation efforts.

In concert with addressing the data deficiencies in the Section 515 maturing mortgage issue, USDA should commit resources to providing data and/or research that advance a better understanding of what happens to affordable housing properties, and their residents, after they leave USDA's portfolio and oversight. Along with information about why properties leave, knowledge about the circumstances under which properties remain affordable or convert to market rate, and where their residents live, could help focus preservation strategies where they can be most effective.

More detailed data on the ownership structure of USDA Section 515 properties would enhance production and preservation efforts for this key housing resource.

USDA Section's 515 Rural Rental Housing Program has been an immensely successful public-private partnership for over 50 years. Owners of Section 515 properties play a key role in the performance and future preservation of this resource. Differences exist across ownership types for this federal loan program. Corporations, individuals, nonprofits, general partnerships, limited partnerships, and public entities are all borrowers of USDA Section 515 loans. These differences in ownership structure can shape project operations and impact decisions on whether a property continues to provide affordable housing upon exit. Greater data and insights on ownership characteristics can help identify and differentiate between large investors, national or regional real estate investment trusts (REITs), or small-scale owners and help tailor financing and preservation resources and efforts at a community level.

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5. *What geographic granularity (e.g., national, state, county) for data best supports your work?*

The Housing Assistance Council increasingly utilizes sub-county data for analyses when available.

Political and economic geography is an important consideration when determining the rurality of an area. The county is a commonly used unit of geography from which to classify rural or outside metropolitan areas. In many rural areas, the county is often identified in political, social, and economic contexts. However, county-based designations are not the optimum criteria on which to base a rural definition. Large counties, particularly in the Western United States, may dilute or mask rural population given their geographic size and influence. Sub-county units of geography such as census tracts, places, or block groups are often more precise and uniform indicators of rurality than counties.

HAC researchers developed a sub-county designation of rural and small-town areas that incorporates measures of housing density and commuting at the census tract level. This new definition includes three general classifications of geographic areas: rural and small-town, suburban and exurban, and urban census tracts. Importantly, HAC's definition also incorporates USDA ERS's Rural Urban Commuting Codes (RUCA) as an integral adjustment factor to help improve this typology.

HAC believes this housing density measure at the census tract level provides a more precise indicator of rural character than many of the more traditional methods employed. HAC encourages USDA ERS to provide census tract data with its products when possible or available.

10. *What emerging policy or economic issues should be addressed in ERS or OCE-WAOB economic analysis, outlook, and forecasts?*

USDA ERS should continue its research and provide data on philanthropic investments to rural America.

Philanthropic funding plays an important role in rural America because it often fills critical gaps left by limited market investment and constrained public resources. Rural communities generally face higher rates of poverty, aging populations, and reduced access to healthcare, housing, and infrastructure. Yet rural areas also typically have fewer large nonprofit institutions and less access to capital. In this context, philanthropy is also catalytic, supporting community capacity, innovation, and essential services that sustain local economies and quality of life.

At the same time, the current landscape of philanthropic investment in rural America is widely viewed as disproportionately low relative to need. Although one

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fifth of the U.S. population lives in rural areas, it has been estimated that less than 7 percent of philanthropic funding reaches these communities – with some estimates even lower.

To help spur greater awareness, strategies and solutions, USDA ERS should update and expand their [landmark study](#) on philanthropic investment in rural communities from 2015 with corresponding data that communities can access and use.

7. Do you use non-USDA data to supplement data elements or variables of interest that are missing from NASS or ERS products? If yes, please specify which data sets you supplement and why. Do you use non-USDA data as a proxy for data elements that are missing from NASS or ERS products? If yes, please specify why you are using non-USDA data in conjunction with USDA data.

USDA should coordinate with the Department of Labor and other federal agencies and institutions to develop much-needed data resources that inform an understanding of how agricultural workers obtain and access housing.

Agriculture is a multibillion-dollar industry in the United States and is integral to the health and well-being of the nation. While no definitive figures are available, an estimated 2.5 million people work harvesting fields, farms, and orchards in the United States.

Data for farmworkers are generally nonexistent in large-scale surveys and data collection instruments such as the decennial Census or the American Community Survey. The U.S. Department of Labor’s National Agricultural Workers Survey (NAWS) provides some insights into the characteristics of farmworkers in the United States. The NAWS, however, does not provide detailed information about housing availability. Additionally, the agricultural industry has increasingly relied on H-2A agricultural visas to attract enough workers to meet the demands of growers and agribusiness – yet little is known about the housing conditions of H2-A workers.

Greater coordination between USDA and the Department of Labor could help fill these knowledge gaps on how agricultural workers are housed. Notably, USDA should provide data indicators on its farm labor housing (USDA Section 514) property reporting that indicates the property houses H2-A visa workers.

Additionally, HAC encourages USDA to support a renewed focus and update to this body of research that will improve the understanding of how changing social, demographic, economic, and policy dynamics have impacted the housing of agricultural workers. With support from USDA and the Department of Housing and Urban Development (HUD), one of the first of its kind [study of national farmworker housing conditions](#) was published in 2001. More than 20 years have passed since that seminal research was conducted and much has changed in farmworker

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dynamics, housing situations, and the use of employment visas to secure farm laborers.

USDA should report Section 502 Direct Loan activity to the Consumer Financial Protection Bureau (CFPB) and the Federal Financial Institutions Examination Council (FFIEC) through the Home Mortgage Disclosure Act (HMDA).

Congress enacted the Home Mortgage Disclosure Act in 1975 to help inform the public and policymakers of mortgage lending activity. With some exceptions, the law calls for financial institutions originating home purchase, refinance, and home improvement loans to present certain information on the loan applicants and loan characteristics.

HMDA data is an invaluable resource for understanding and improving home lending markets across the country. Policymakers and researchers rely on HMDA data to better understand mortgage lending markets, and housing builders and developers use HMDA to evaluate local market conditions and plan for business.

Currently, USDA Section 502 Guaranteed home loans are reported under HMDA. To help provide a more complete picture of mortgage finance in rural communities, HAC recommends that USDA also report Section 502 Direct Loan activity under HMDA.

Additionally, we recommend that USDA and CFPB/FFIEC coordinate to provide separate reporting in HMDA that distinguishes between mortgage activity for USDA Section 502 guaranteed loans and loans guaranteed by the Farm Service Agency (FSA). Currently these loan characteristics are combined in HMDA reporting. Reporting that distinguishes between the two products would enhance analysis and understanding of rural mortgage markets and provide more clarity and value to both FSA and RHS.

USDA should work with HUD and the Census Bureau to put “rural” back into the American Housing Survey (AHS).

The American Housing Survey is one of the most comprehensive and detailed data sources on housing conditions in the United States. The AHS is a powerful resource for researchers and housing policymakers alike. But the rural geocodes have been removed from the Public Use File (PUF) of this data resource. This action renders the AHS virtually useless for any rural, or even meaningful, geographic analysis of housing trends with this data source. USDA should work with (HUD) and the U.S. Census Bureau to remedy these inequitable deficiencies and make rural data available to AHS users again.

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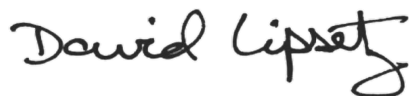
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Conclusion

Data is central in today's world. While data and information have proliferated, quality data is still often more difficult to access for rural communities. HAC believes that rural Americans deserve the highest quality information and data to inform strategies, policies, and solutions for their communities. The immense data assets and capacities of USDA are a vital and integral resource that help rural stakeholders every day. Rural communities are dynamic, determined, and resilient, and their residents and stakeholders know best what their housing futures should be. It's up to policymakers and researchers to help facilitate the needs and aspirations of residents for new, and affordable, homes for rural people and their communities with accessible data resources.

Thank you for your consideration of these comments. Please do not hesitate to contact me if you have questions or need additional information.

Sincerely,



David Lipsetz
President & CEO

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