



We help build homes and communities across rural America.

April 10, 2023

Solomon Greene,  
Principal Deputy Assistant Secretary—Office of the Assistant Secretary for Policy  
Development and Research  
U.S. Department of Housing and Urban Development  
451 7th Street SW, Room 10276,  
Washington, DC 20410-0500

Re: **Request for Information Regarding HUD's Learning Agenda Supplement:  
Fiscal Year 2023. Docket No. FR-6372-N-01**

Dear Deputy Assistant Secretary Greene:

The Housing Assistance Council (HAC) appreciates this opportunity to submit comments in response to the February 9, 2023 Request for Information regarding HUD's Learning Agenda Supplement for Fiscal Year 2023.

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. HAC's research and data resources have informed strategies and solutions for complex housing issues across the nation. HAC is frequently consulted by public and private entities for insights and understandings into housing conditions, issues, and solutions. Congress and Federal agencies such as HUD, USDA, CFPB, the U.S. Treasury, and the Federal Housing Finance Agency, among others, regularly engage or consult with HAC on issues of housing research and policy. HAC has published more than 130 publications on a wide range of topics and HAC's research and data analysis are regularly featured in academic journals, commissioned studies, public reports, and numerous research and policy presentations.

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 this agenda.

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 HUD's strategic goals related to 1) support for underserved communities, 2) increasing the supply of affordable housing, and 3) promoting homeownership and equitable communities.

1025 Vermont Ave., N.W., Suite 606, Washington, DC 20005

📞 202-842-8600 ✉️ [hac@ruralhome.org](mailto:hac@ruralhome.org) 🌐 [ruralhome.org](http://ruralhome.org) 📞 202-347-3441

HAC is an equal opportunity provider, employer, and lender.

HAC addresses the specific questions presented in the RFI below:

*1. New priority learning questions that reflect emerging or unanticipated needs and knowledge gaps and that help advance HUD's mission.*

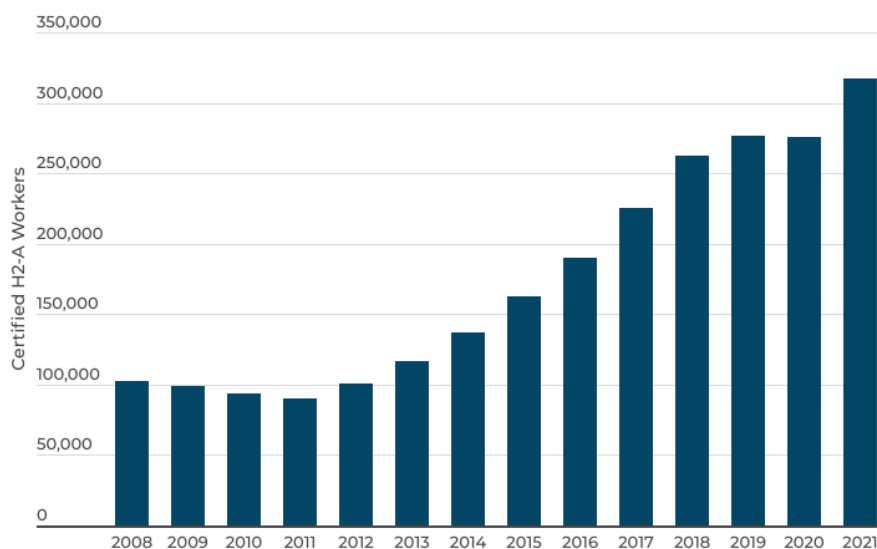
### **Farmworkers are essential to our nation's security and food supply, but we know virtually nothing about farmworker housing conditions**

Agriculture is a multibillion-dollar industry in the United States and is integral to the health and well-being of the nation. The affordability of fresh fruits and vegetables comes, in part, through cheap labor undertaken by farmworkers. 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 quality or conditions. 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.

## **H2-A Visa Farmworkers, 2008-2021**

### **Certified H2-A Workers**



With support from HUD, HAC conducted the first of its kind study of national farmworker housing conditions in 2001.<sup>1</sup> More than 20 years has passed since that seminal research was conducted and much has changed in farmworker dynamics, housing situations, and the use of employment visas to secure farm laborers. HAC strongly encourages HUD and PD&R 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 farmworkers.

**PD&R should address and support research on new and emergent issues in manufactured housing – especially affordability**

Manufactured homes – often referred to as “mobile homes” or “trailers”, are an overlooked and maligned component of our nation’s housing stock. But manufactured homes are an important source of affordable housing for millions of Americans, especially those with low incomes and in rural areas. While the physical quality of manufactured housing continues to progress, the basic delivery system of how these homes are sold, financed, appraised, sited, insured, warranted, and

**Average Sales Price of New Manufactured Homes  
 January 2020 - September 2022**



Source: HAC Tabulations of the U.S. Census Bureau's Manufactured Home Survey



<sup>1</sup> *No Refuge From The Fields: Findings From A Survey Of Farmworker Housing Conditions In The United States*. Housing Assistance Council. <https://ruralhome.org/wp-content/uploads/storage/documents/norefuge.pdf>.



managed, all contribute to asymmetries that affect costs and affordability for this unique type of housing.

Housing affordability is by far the largest housing concern in the nation, and affordability problems have also crept into the manufactured housing market in recent years. While manufactured homes typically have lower nominal costs, there are unique, or “hidden” costs such as lot rents, high-cost financing, and high energy and utility costs for older mobile homes that often mask severe affordability concerns for manufactured home residents. HUD should support research on increased affordability concerns and dynamics of manufactured home residents.

HUD is the primary federal agency responsible for the regulation and administration of manufactured homes through numerous statutes and regulatory requirements. Additionally, new policies and efforts such as FHFA’s Duty to Serve, and the newly enacted PRICE initiative, command increased attention from PD&R on this important source of housing for more than 6 million households across the United States.

### **What’s happening to homes and residents that are leaving the subsidized stock?**

Federally assisted homes are an important source of rental housing in many rural communities. But rural communities are losing federally assisted rental housing at an alarming rate. Relatively few subsidized 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 projected to leave the portfolio in the next few decades. The residual impacts of this trend are exponential. Once a federally assisted property leaves the portfolio, the property owner is generally no longer subject to government oversight or regulations on use of their property. Additionally, some tenants are no longer eligible for rental assistance, and in some instances, the homes may no longer be affordable for their tenants. These challenges are further exacerbated by a dearth of good quality rental housing in many rural communities.

To help address the deficiency in our understanding of this emerging housing dynamic, PD&R should commit resources to research and advance a better understanding of what happens to affordable housing properties, and their residents, after they leave the federal government’s portfolio and oversight.

### **Exploring the impact of rural Area Median Incomes on HUD program access**

Rural incomes have consistently lagged far behind their urban and suburban counterparts. Since 2007, rural median income has averaged 25 percent below the urban median.<sup>2</sup> This gap is even more pronounced in rural persistent poverty

---

<sup>2</sup> *Rural America at a Glance, 2017 Edition*. U.S. Department of Agriculture. Economic Research Service. [https://www.ers.usda.gov/webdocs/publications/85740/eib182\\_brochure%20format.pdf?v=5](https://www.ers.usda.gov/webdocs/publications/85740/eib182_brochure%20format.pdf?v=5).



counties, where HAC has focused our work. Persistent poverty is often concentrated in specific geographic areas, including the Mississippi Delta, Indian Country, rural Appalachia, the border colonias, and farmworker communities. In 2020, there were 377 persistently poor counties in the United States (455 when including Puerto Rico), and 81 percent of those were rural in nature.<sup>3</sup>

As a result of these pockets of geographically-concentrated low incomes, some rural and persistently poor areas have such low Area Median Incomes (AMI) that they struggle to equitably access income-targeted HUD programs. Our colleagues at the Partners for Rural Transformation have put forward a policy proposal to institute a national AMI floor, which is intended to address this issue and improve the utilization of HUD programs in rural areas.<sup>4</sup> HAC encourages HUD and PD&R to explore an analysis of this proposal and these AMI challenges more broadly, to balance the need to serve rural and persistently poor communities equitably while also still prioritizing the lowest income households.

*2. Priority data needs that reflect knowledge gaps and that, if addressed, could help advance HUD's mission.*

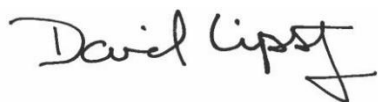
### **Put “Rural” back into the American Housing Survey**

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

### **Conclusion**

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

---

<sup>3</sup> “The Persistence of Poverty in Rural America.” Rural Research Brief. Housing Assistance Council. <https://ruralhome.org/persistence-poverty-rural-america/>

<sup>4</sup> “Equity in Federal Housing and Community Development Funding: A Proposal for a National Floor.” Policy Brief. Partners for Rural Transformation. [https://www.ruraltransformation.org/wp-content/uploads/2021/07/Equity-in-Federal-Housing-and-Community-Development-Funding\\_A-Proposal-for-a-National-Floor-3.pdf](https://www.ruraltransformation.org/wp-content/uploads/2021/07/Equity-in-Federal-Housing-and-Community-Development-Funding_A-Proposal-for-a-National-Floor-3.pdf)

