



We build homes and communities in rural America

July 29, 2024

Regulations Division  
Office of the General Counsel  
Department of Housing and Urban Development  
451 7<sup>th</sup> Street SW, Room 10276  
Washington, DC 20410-0500

RE: Docket No. FR-6144-P-01

HOME Investment Partnerships Program: Program Updates and Streamlining

To Whom It May Concern:

The Housing Assistance Council (HAC) appreciates the opportunity to comment on the proposed rule changes to the HOME Investment Partnerships Program. Much work has clearly gone into the proposed rule, and HAC commends the Department of Housing and Urban Development (HUD) for making numerous long-awaited revisions that will positively impact communities throughout the United States.

HAC helps build homes and foster vibrant communities across rural America. Founded in 1971, headquartered in Washington, D.C., and working in all 50 states, HAC is a national nonprofit organization and a certified community development financial institution (CDFI). We are committed to giving rural organizations the capacity to build affordable homes and strengthen their communities through below-market financing, technical assistance, training, and information services. Notably, HAC serves as the “Information Backbone” of rural America, with public and private sector institutions alike using HAC’s independent, non-partisan research and analysis to shape policy. And HAC has provided technical assistance to small, rural groups seeking to access HOME funds in rural places for many years. Thus, HAC is uniquely positioned to offer comments on how the proposed rule changes to the HOME program will affect rural communities, especially those facing limited local capacity and persistent poverty status.

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## GENERAL COMMENTS

### The Rural Housing Landscape

Small towns and rural regions are diverse, both demographically and economically. They face a wide array of local challenges and opportunities for developing their communities and housing. While each place is unique, HAC has documented several themes across rural places. Persistent poverty is a predominantly rural condition. Habitable rural housing is in severely short supply. The adequate housing that does exist is often unaffordable because rural incomes are low and run well below the national median. Rural housing lacks adequate plumbing and kitchen facilities at a rate above the national average. Overcrowding is not uncommon in some rural regions. Decades of stagnant rural housing prices have denied homeowners the wealth and mobility so often associated with buying a home. And racial inequity is endemic as the result of housing policies and banking practices that have historically excluded rural people of color. Complicating these challenges, a lack of reliable rural data obscures rural realities.

The greatest housing challenge rural America faces, like the country more generally, is housing affordability. Though housing costs may nominally be lower in rural areas than in cities and suburbs, an increasing number of rural households find it challenging to afford their monthly housing expenses, whether they are renters or homeowners. Over 25 percent of rural households set aside more than 30 percent of their monthly income towards housing costs, making them cost burdened. And 21.5 percent of rural renters spend over 50 percent of their monthly income on housing costs, making them severely cost burdened.<sup>1</sup>

Between 2010 and 2020, the number of housing units in rural areas increased by roughly 410,000, or 1.7 percent. In contrast, during that same time, there was a 12 percent increase in housing units in suburban areas, and a 9 percent increase in housing units nationwide. It is also important to note that not all rural communities benefitted from this housing increase. In fact, 24 states, mostly in the Midwest, Southeast, and industrial North, saw decreases in their total number of rural housing units over the last decade.<sup>2</sup>

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<sup>1</sup> Housing Assistance Council, *Taking Stock: Rural Housing* (Washington, DC: Housing Assistance Council, 2023), <https://takingstockrural.org/taking-stock/rural-housing/>.

<sup>2</sup> Ibid.

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Additionally, rural housing stock in the United States is aging, substandard, and overcrowded at rates higher than the national average. According to estimates from HUD's American Housing Survey, over 1.4 million, or 5.6 percent, of homes in rural areas are classified as inadequate. Of this total, 368,000 are classified as severely inadequate, meaning that they have serious deficiencies with plumbing, heating, electric, or upkeep.<sup>3</sup> At the same time, rural communities struggle with household crowding. Following HUD's criterion, there are over 550,000 overcrowded homes in rural America.<sup>4</sup>

These are the factors HAC takes into consideration as our lens for these comments, and for all of our work.

## HOME in Rural Areas

Programs like the HOME Investment Partnerships Program have the power to shift some of these dynamics in rural places. However, federal housing programs are often not well-suited to function in the rural context. Capacity challenges make it difficult for rural places to compete for funding with larger metropolitan areas. HUD formula allocation programs like the Community Development Block Grant (CDBG) and HOME, which have been critical affordable housing resources, have not always served rural areas proportionately. The smallest and least-resourced places must compete for the balance of state funds, while larger communities receive guaranteed funding.

The local groups HAC works with, through our lending and technical assistance, use the HOME program for both homeownership and rental housing. Over the last decade, we have observed that rural Community Housing Development Organizations (CHDOs) and nonprofit subrecipients experience significant challenges in effectively utilizing HOME funds. Primarily, these difficulties arise from how Participating Jurisdictions (PJs) have adapted their programs, largely as a response to the 2013 regulation changes and subsequent funding reductions. These adaptations have often resulted in a more competitive and restrictive funding environment, complicating the process for small rural CHDOs to access and effectively use HOME funds. This shift has led to a marked decrease in resource utilization for the groups we work with, underscoring the need for targeted capacity building efforts to better prepare CHDOs to navigate these complexities. There is a growing frustration with the HOME program among many small nonprofits that has

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<sup>3</sup> Ibid.

<sup>4</sup> Ibid.



significantly diminished their likelihood of reapplying for grants after repeated unsuccessful attempts.

There is an overwhelming lack of consistency across the country in how state PJs operate their HOME programs. Based upon feedback HAC has received from the groups we work with across the country, it is safe to say that no two states run the HOME program the same way, and often, the states offer little transparency into their management of HOME program funds. Rural CHDOs and other groups already face challenges in accessing HOME funds. In some states, the ambiguous management of the HOME program further compounds those challenges.

This new rule is a major step in the right direction when it comes to making the HOME program more accessible and user-friendly in rural places. However, because of the highly prescriptive nature of the HOME statute, a variety of statutory changes are also needed to fully transform the program such that it more positively impacts rural America.

Finally, the success of this new rule will depend on HUD investing significant and proactive effort into training PJs on the impacts of the rule, once finalized. Inconsistencies and varying program interpretations between PJs have long been a challenge in the HOME program, so training PJs will be foundational in enabling them to take full advantage of the HOME program and its funds for their communities.

## SPECIFIC COMMENTS

### Community Housing Development Organizations

HAC appreciates HUD's commitment to making the CHDO designation easier to attain in this proposed rule. CHDOs' capacity to both develop projects and sustain and grow their organizations does not happen in a vacuum, and it often already happens amidst scarce resources. This is particularly true in the persistently poor rural areas where HAC works. Following the 2013 HOME rule, rural organizations were disproportionately and adversely affected by the high bar of the CHDO definition. This resulted in fewer rural organizations being able to access the HOME CHDO set-aside. We view these proposed changes as a step in the right direction for rural equity in the HOME program, and make the following specific recommendations.

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### *Low-Income Board Representation*

HAC supports the existing standard requiring at least one-third representation of low-income community residents on a CHDO's governing board as both appropriate and necessary, even in rural or other underserved communities. This standard ensures that the voices and perspectives of those most affected by the decisions of these organizations are not just heard, but shape outcomes.

We also support broadening eligible low-income representatives to include individuals designated by a low-income neighborhood organization and authorized representatives of nonprofit organizations that address the housing or supportive service needs of residents of low-income neighborhoods. As demonstrated by their work, these individuals have a vested interest in the community and a commitment to housing and community development for low-income families.

Lastly, HAC also supports the two additional changes proposed by Fahe in their comments on this proposed rule: 1) to recognize the lived experience of poverty by allowing Board Members who qualify as low-income when they join a CHDO Board to continue to qualify as low-income for a period of ten years, and 2) to allow a grace period for Board Members who move or have their home address re-designated into a different census tract to continue to qualify as living in a low-income community for the duration of their current Board term, not exceeding a five-year period. Both of these suggestions would serve to increase Board Member retention, particularly in rural areas.

### *Public Official Board Representation*

In the rural communities in which we work, a number of CHDOs were created by local housing authorities (LHAs), councils of governments (COGs), regional planning commissions (RPCs), and tribal entities (TDHEs), which are frequently incorporated as governmental entities. Permitting LHAs, COGs, RPCs, and TDHEs to spin off CHDO arms is beneficial to all parties as long as the governmental entity is unrelated to the PJ and has separation from political influence. The ability to use shared staff, shared office space, and participation on the Board has proven beneficial to the creation of strong CHDOs.

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Because of that, HAC supports the proposed change clarifying the limitation to “one-third public officials” within a CHDO Board. The current expansive interpretation of “governmental entity” in the definition has resulted in many interested and qualified local residents – including some who would also qualify as low-income Board Members – from becoming Board Members.

### *Non-HOME Experience as Organizational Capacity*

Organizational capacity is frequently a challenge for rural organizations looking to qualify as CHDOs. In rural areas, affordable housing nonprofits are often small, have very limited full-time staff, and may not have experience carrying out projects with HOME funds. While the HOME program is complex, it also used to serve as a foundation upon which smaller groups could cut their teeth, which is often no longer the case due to the increasingly competitive nature of HOME funding.

HAC supports the portion of the proposed rule that would broaden the requirement that an organization have demonstrated capacity for carrying out projects assisted with HOME funds to also include housing projects assisted with other federal funds, Low-Income Housing Tax Credits, or local and state affordable housing funds. This change will help more small, rural groups to meet the organizational capacity requirement.

### *Volunteers as Organizational Capacity*

HAC also appreciates the balance that HUD is looking to strike when considering the contributions of volunteers when assessing the capacity of a CHDO. In rural areas, CHDOs are often small, with a very limited staff and a heavy reliance on volunteers. But, as mentioned in the rule, the connection of volunteers to an organization may be tenuous or temporary. We support considering the capacity and experience of volunteers who are Board Members or officers of the organization, because such a role indicates a deeper and less transient commitment to the organization.

Additionally, we would suggest HUD also consider the capacity of donated labor from peer agencies. Public Housing Authorities and Regional Planning Commissions will sometimes provide staff to CHDOs or organizations seeking to become CHDOs. Factoring in the expertise

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of these staff members would give small, rural organizations another way to demonstrate capacity.

### *Statewide CHDOs*

We appreciate HUD's intention to encourage more CHDO set-aside dollars to find their way to rural areas by allowing nonprofits with statewide service areas to qualify as CHDOs. Rural places are not often proactively considered in the rule making process, and it is clear that HUD has put considerable thought into how the CHDO availability and capacity could be improved in rural places specifically. However, we do have concerns about the concept of a statewide CHDO and the impact that it would have on what it means to be a CHDO with local expertise in serving a specific community.

Establishing statewide CHDOs is not the answer. The proposal for statewide CHDOs in rural areas, as currently written, could inadvertently further disadvantage small, rural groups who are hoping to access the CHDO set-aside by forcing them to potentially compete with high-capacity, statewide organizations. Additionally, this change could result in PJs taking the easier route by awarding their CHDO set-aside to one statewide CHDO instead of working to build the capacity of local groups, as was the original intent of the CHDO designation. Some states have robust CHDO networks, which have been fostered over many years thanks in part to the CHDO set-aside, accompanying revolving proceeds, and additional capacity building funding. This is true even in persistently poor regions. It would be antithetical to the intent of the CHDO designation to divert this funding meant to grow local organizations and instead make those organizations compete with statewide groups.

We would welcome continued conversation around how CHDO availability and capacity could be improved in rural places, especially in states that have not yet done the necessary work of fostering their local CHDO networks. Some suggestions on that point are included later in this comment under the specific question HUD posed in the proposed rule on rural CHDO access.

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## *Capacity Building Funds*

The power of capacity building in rural communities cannot be overstated. Rural communities often have small and part-time nonprofits and local governments, inadequate philanthropic support, and a shortage of the specialists needed to navigate the complexities of federal programs and modern housing finance. Targeted capacity building through federal investments is how most local organizations build the skills, tap the information, and gain the wherewithal to do what they know needs to be done. Without deeply embedded, high-capacity local organizations, available federal funding and other capital will never evenly flow to rural communities.

For that reason, HAC fully supports the change in this proposed rule to correct the inadvertent drafting error included in the 2013 HOME rule that resulted in an unintended barrier to using CHDO operating expense and capacity building funding provided through HOME to assist organizations to meet the requirements for CHDO designation. It was the intent of Congress that CHDO operating and capacity building funds could be awarded to nonprofit affordable housing developers who might become CHDOs, and this change would align with that intent. Some states have robust CHDO networks already, but for those PJs that struggle to grow a CHDO network, this clarification will give the PJ a tool to invest in and grow their local CHDOs.

The HOME statute makes it incumbent on PJs both to “make all reasonable efforts ... to maximize participation by the private sector, including nonprofit organizations,”<sup>5</sup> as well as to “make reasonable efforts to identify community housing development organizations that are capable or can reasonably be expected to become capable of carrying out elements of the jurisdiction’s housing strategy.”<sup>6</sup> There is real power in fostering a robust local CHDO network, and we would encourage PJs to make use of this capacity building funding to help grow the capacity of groups who are seeking to become CHDOs.

In addition to the proposed changes, we address additional changes that could improve rural CHDO capacity below.

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<sup>5</sup> 42 U.S. Code § 12751, <https://www.govinfo.gov/content/pkg/USCODE-2011-title42/html/USCODE-2011-title42-chap130.htm>.

<sup>6</sup> 42 U.S. Code § 12771, <https://www.govinfo.gov/content/pkg/USCODE-2011-title42/html/USCODE-2011-title42-chap130.htm>.

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*Specific solicitation of comment #1. The Department specifically solicits public comment about any additional changes it should consider, within statutory constraints, that will improve CHDO availability and capacity in rural areas.*

HAC appreciates HUD posing the above specific solicitation for comment in the proposed rule. Below are a few of our thoughts on how to improve CHDO availability and capacity in rural areas:

- HUD should expand eligible activities for rural CHDOs to include activities more common to affordable housing work in rural areas. Specifically, owner occupied home rehab and USDA Section 523 mutual self-help should both be eligible activities for rural CHDOs.
- To help rural groups succeed as CHDOs, HUD should also consider a minimum amount of operating support that will be provided. This should help ensure that CHDOs planning and undertaking CHDO-eligible activities will have a determined amount of funding to help support them during the pre-development and construction phases of a project.
- We would like to see HUD encourage PJs to allocate CHDO HOME proceeds to remain with the CHDO, which allows the CHDO to increase production capacity, internal expertise, and self-sustainability, especially in rural areas where other supportive resources for the CHDO are scarce.
- HUD should require PJs to demonstrate that all avenues to expending their CHDO set-aside have been exhausted before allowing a PJ to re-obligate CHDO funds. This includes that a PJ has delivered the maximum amount of capacity building funding and implemented CHDO proceeds policies.
- Rural challenges around CHDOs vary widely across the country due to local strengths and weaknesses. In some instances, we see groups who qualify as CHDOs, but fail round after round to access HOME CHDO set-aside funds in extremely competitive funding cycles. The most common reason behind this failure is that the group is unprepared for the HOME application process, lacks experience on their development team, or has challenges with the budget proforma, resulting in an application that does not score favorably. Rural CHDOs need targeted technical assistance to help them craft successful applications. Without this technical assistance, they become demoralized after failing to secure

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funding in multiple rounds. PJs also need to be trained to be proactive in offering capacity building resources when they see multiple unawarded applications from a rural CHDO.

## Community Land Trusts

While HAC does not have extensive community land trust (CLT) experience amongst the groups with which we work, CLTs are becoming an increasingly popular option, especially for high-amenity, recreation-based rural communities who are experiencing skyrocketing housing costs and seeing service industry and low- to moderate-income families priced out of their communities. We are glad to see that this proposed rule includes a simpler, yet more expansive definition for CLTs. This new definition – that CLTs must merely be nonprofit organizations primarily devoted to the development and maintenance of affordable housing – will allow more organizations to qualify as CLTs, and in turn participate in the HOME Program. This will strengthen efforts to preserve existing affordable housing, especially in rural areas. Additionally, requiring housing units on CLT-owned land to remain affordable for at least 30 years and giving CLTs mechanisms to enforce affordability, including the right of first refusal and the preemptive right to purchase housing units on land held by the CLT, will help keep affordable housing units in the hands of trusted, community-oriented organizations in the long-term.

## Homebuyer Housing

HAC supports the changes in this proposed rule around homebuyer housing, all of which could improve program access and outcomes in rural places. Extending the deadline for the sale of a HOME-assisted homebuyer housing unit from nine months to 12 months after construction is completed will give groups more time to sell units, especially in rural markets that may be less “hot” than the national average.

Additionally, because of the disproportionate prevalence of substandard and aging homes in rural and persistently poor communities, permitting homebuyer housing acquired with HOME assistance (e.g., down payment assistance) up to six months to meet HOME property standards will allow potential rural buyers to invest in an existing home in their community that could benefit from rehabilitation.

And finally, the proposed establishment of multiple model resale formulas to help PJs comply with the HOME resale requirements will provide flexibility for

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PJs to determine which model works best for their specific local needs and housing market conditions. The addition of these four resale formulas as an option for PJs to rely on will also cut down on current inconsistencies between PJs in resale formula calculations.

In addition to the changes proposed in the new rule, we also support calls from stakeholders to return to the use of the FHA Single Family Mortgage Market 203(b) data for the use of calculating home price limits for the 95 percent Homeownership Value Limit. While the 95 percent limit is statutory, the method by which it is calculated is within HUD's regulatory jurisdiction. The current methodology for determining the 95 percent limit creates a barrier for both developers looking to meet housing demand and homebuyers wanting to live in communities of their choice, especially in rural areas. There simply are not enough homes priced below the limit to meet the demand. The FHA Single Family Mortgage Market 203(b) data was previously used for this purpose prior to the 2013 HOME final rule and provides a dynamic approach for developers to work with the most representative data in an ever-evolving economic environment.

Finally, HAC also supports explicitly allowing families that are using a USDA Section 502 direct loan to purchase their home to qualify for HOME funding based on the low-income limits of the Section 502 direct loan program. The USDA Section 502 program uses HUD income limit data but adjusts to account for the impact of low rural area median incomes through a method called "income-banding". Income banding is a two-tier income limit structure for USDA's single family housing programs, which bands together 1-4 person households using the 4-person income level set by HUD, and 5-8 person households using the 8-person income level. HUD has a precedent for this type of cross-departmental waiver with the Self-Help Homeownership Opportunity Program (SHOP), which permits this income banding approach.

## Maximum Per-Unit Subsidy Limits

HAC supports HUD's proposed increase of the interim maximum per-unit subsidy limit from 240 percent to 270 percent of the Section 234 basic mortgage limit. While most of the PJs that we work with do not reach this limit in their projects, we are still happy to see HUD offer more financial flexibility to those who do approach the limit in their developments. And for projects that reach the limit, this rule change will make the development of green buildings more attainable by increasing the monetary value of the 5

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percent over-the-limit allowance for green building that HUD is also proposing in this rule change.

Once HUD establishes a new, permanent methodology to determine maximum per-unit subsidy limits, we would encourage HUD to periodically update and adjust it to reflect changes to costs of home acquisition, rehabilitation, and construction. The costs of materials and labor, as well as the property values of homes, fluctuate frequently in rural areas, where there are fewer comps. It would be greatly beneficial for rural PJs trying to develop new housing to have maximum per unit subsidies that reflect that.

### Green and Resilient Property Standards in HOME-Assisted Housing

HAC is appreciative of HUD's efforts to incentivize the building and rehabilitation of green, resilient homes. Permitting PJs to exceed the maximum per-unit subsidy so that they can meet green building standards is a promising idea. However, in some cases, we have heard from stakeholders that the proposed 5 percent allowance may not be sufficient to fully cover the additional costs that come with meeting higher building standards. We encourage HUD to conduct an assessment of what the true cost of meeting green building standards will be in various markets and reflect the results of that assessment in the final rule.

HUD also deferred for a later date the selection of a specific green building standard which will apply to the HOME program, stating that the standards will be "HUD-identified green and resilient building standards that exceed NSPIRE and HUD-established Energy Efficiency standards." We encourage HUD to provide opportunities for public involvement and comment as it selects which standards to apply here.

### Rental Housing

HAC applauds HUD's efforts to streamline compliance procedures for rental housing projects. Broadly, compliance is often disproportionately burdensome for small groups in remote rural areas who have limited staff and have to travel greater distances for compliance checks, so we are glad to see an attempt at streamlining being made here. Aligning HOME rental requirements with other frequently combined funding sources will make the program less burdensome.

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Additionally, permitting streamlined or less frequent procedures for small-scale rental housing projects (one to four total units) for reexamination of annual income, tenant selection, and ongoing physical inspections will be good for rural areas, where the size of projects is often smaller. This will help smaller organizations who are managing HOME projects to save on compliance-related staff capacity and invest that staff capacity in more productive ways.

## Tenant-Based Rental Assistance

HAC does not have extensive experience with PJs or groups that use HOME for tenant-based rental assistance (TBRA). However, we are broadly supportive of enhancing flexibility in HOME TBRA programs to reduce burden, better serve the most vulnerable households, and support wealth building, as intended by this proposed rule.

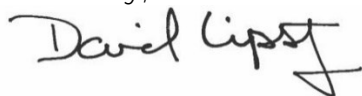
## Tenant Protections

HAC is supportive of the meaningful proposed additions to the tenant protections elements of this new HOME rule. Strengthening and expanding tenant protections through mandatory HOME lease addendums that impose a set of uniform tenant protections for HOME-assisted rental housing tenants and HOME TBRA recipients is simply the right thing to do for families living in these units or accessing that rental assistance.

In order to make these proposed changes successful and reduce any unintended impact on small, rural organizations and the communities they serve, we do also encourage HUD to consider ways that HUD or PJs could relieve any perceived burden that these new protections could put on small rural groups using HOME for rental projects.

Thank you for your time and consideration of these comments. We greatly value our partnership with HUD and appreciate the time and thought that has gone into this proposed new rule for the HOME program. We look forward to continuing to work to improve HOME program outcomes for rural places.

Sincerely,



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President & CEO

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