

August 25, 2022

The Honorable Marcia L. Fudge
Secretary
United States Department of Housing and Urban Development
451 Seventh Street, SW
Washington, DC 20410

Re: Request for Information Market Research Draft Solicitation” for Housing Assistance Payments (HAP) Contract Support Services (HAPSS), formerly known as the Performance-Based Contract Administrator (PBCA) Program, Solicitation No: 86614622R00001 published on or about July 27, 2022 (“Draft Solicitation”)

Dear Secretary Fudge:

On behalf of the undersigned associations, we urge the United States Department of Housing and Urban Development (“HUD”) to extend the deadline for submittal of public comments with respect to the Draft Solicitation. While we appreciate the recent action to extend the deadline to September 28, we believe an extension to October 28 will result in public commentary that will be more helpful to HUD as it designs a final request for proposal.

Many potential commenters will need time to coordinate with other stakeholders to consider the implications of HUD’s proposed segmented regional approach as proposed in the Draft RFP. The additional time will make it possible for commenters to submit meaningful and effective recommendations to HUD, likely contributing to a product that better serves the public.

The Draft RFP is necessarily complex, incorporating many voluminous documents by reference. The current August 29th deadline for public comments arbitrarily imposes an unreasonably abbreviated period for commenters to adequately consider the complex nature of the Draft Solicitation. We urge HUD to allow stakeholders at least 90 days commencing from the Draft Solicitation’s publication to comment on this important draft, which raises significant administrative, legal, operational, and policy issues.

HUD published the Draft Solicitation at the end of July, after the House went on summer recess and just before the Senate’s summer adjournment, during a time many stakeholders and policymakers devote their attention to other matters during significant portions of August. As a result, stakeholders with the most relevant input are compelled to consider and respond to this request for information within too short a timeframe to fully consult with their own stakeholders and governance leadership. We believe an extension of the comment deadline is important, fair, and reasonable.

We also think it is vital to improve the Draft Solicitation because of the enormous impact a final solicitation will have on residents, communities where Section 8 properties are located, HUD, property managers and owners, and HUD. Providing ample time at this stage of the process to ensure the solicitation is improved will positively benefit all of these stakeholders, which we presume is the collective goal. Considering HUD has taken nearly five years to develop HUD’s latest effort to publish the Draft

Solicitation, giving commenters and the public 60 additional days to provide comments seems fair and reasonable.

In closing, for all these reasons, it is necessary and appropriate for HUD to extend the comment period on the draft solicitation from 30 days after the publication date to 90 days, establishing a reasonable deadline for comments of Friday, October 28, 2022.

Sincerely,

Local Housing Administrator Coalition

National Association of Housing and Redevelopment Officials

National Council of State Housing Agencies

Council of Large Public Housing Authorities

Greater Syracuse Tenants Network

LeadingAge

National Affordable Housing Association

National Housing Conference

National Housing Law Project

National Housing Trust

National Leased Housing Association

National Housing Law Project

Network for Oregon Affordable Housing

NHP Foundation

Public Housing Authorities Directors Association

Stewards of Affordable Housing for the Future