Good morning, Chairman Price, Ranking Member Diaz Balart, and distinguished members of the Committee. Thank you for the opportunity to testify regarding the need to preserve affordable housing.

I am Ellen Lurie Hoffman, Federal Policy Director at the National Housing Trust (NHT). NHT is a national nonprofit organization dedicated to preserving and improving affordable housing, ensuring that privately owned rental housing remains in our affordable housing stock and is accessible to low-income families and sustainable over time. Using the tools of real estate development, rehabilitation, finance, and policy advocacy in conjunction with sustainable practices, the Trust is responsible for saving more than 36,000 affordable homes in all 50 states, leveraging more than $1.2 billion in financing.

The subject of this hearing is the need to build and preserve more affordable housing. Given NHT’s mission and experience, I will limit my remarks today to the critical need to preserve the nation’s affordable housing stock, although I want to acknowledge that meeting our nation’s housing needs will require both preserving existing and building new affordable housing.

Before I dive into the facts and figures of my testimony, I would like to tell the Subcommittee the story of one property that NHT Communities, our real estate development practice, preserved as affordable housing. Friendship Court is home to 150 low-income families in downtown Charlottesville, Virginia. Built in 1978, NHT Communities acquired the property in partnership with Piedmont Housing Alliance (PHA), a regional nonprofit housing provider, in 2001 amid strong concern that its 150 units of housing with project based rental assistance would be lost to market rate conversion or redevelopment, leaving residents without an affordable option in Charlottesville. Today, NHT and PHA are redeveloping the property, using Low-Income Housing Tax Credits and local resources from the City of Charlottesville to maintain long-term affordability and improve the property. The multiphase redevelopment plan was designed in collaboration with residents and the community and will result in expansion of the property on currently vacant land and...
the addition of 200 new units of affordable and workforce housing, creating an economic ladder for residents. The property’s location just blocks away from Charlottesville’s downtown pedestrian mall benefits from robust job opportunities. Without preserving this housing, it would undoubtedly have been converted to market rate housing and become out of reach to low-income families, as luxury condominiums and hotels have sprouted up nearby.

The Martin family, comprised of a single mother and six children, call Friendship Court home. The mother was able to escape an abusive relationship and homelessness by moving to this property. The children benefit from onsite computer labs, community centers, and recreational programming. The story of Friendship Court’s successful preservation and the residents who benefit from it is far from unique. To promote better understanding of the benefits of affordable housing to low-income residents, NHT has gathered the personal stories of over 150 residents of affordable rental housing, including seniors, single parents, veterans, people with disabilities, and those in recovery, which are available on our Where Will We Live? website.

**Growing Rental Housing Needs and Limitations of Current Federal Assistance**

As rent levels climb and incomes stagnate, the nation continues to face a rental housing affordability crisis. According to the Joint Center for Housing Studies at Harvard University, nearly one-third of all United States households are defined as cost-burdened, meaning they paid more than 30 percent of their incomes for housing in 2016. For renters alone, however, the cost-burdened share is 47 percent. Of these 20.8 million renter households with burdens, some 11 million pay more than half their incomes for housing and are considered severely burdened.

**Affordable Housing Supply is At Risk**

Despite the enormous need, federal housing assistance serves just one out of every four very low-income renter households. According to the National Low-Income Housing Coalition, the gap between supply and demand for rental units affordable and available to very low-income households is 7.7 million. This shortfall could become much worse given the threats to the affordable supply. Subsidized units with expiring housing assistance are at risk of shifting to market rate. Affordability restrictions on 533,000 Low-Income Housing Tax Credit units, 425,000 project-based Section 8 units, and 142,000 other subsidized units are set to expire within the next 10 years, placing over one million households at risk of losing their affordable homes. According to the Urban Land Institute, current levels of new affordable multifamily development—roughly 100,000 annually—will replace only about half of what is at risk of loss in the coming years and will fall far short of meeting rising demand. The affordable housing crisis demands that we build new affordable housing while simultaneously preserving all existing assets.

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Why is Preservation Important?

Preservation may be defined as actions taken to ensure that a property’s housing subsidy and rent restrictions remain in place, ensuring long-term affordability. Often accomplished by mission-driven developers who are committed to long-term affordability, preservation usually involves financial recapitalization and physical renovation of a property.

According to the Urban Land Institute, constraints on supply have exacerbated rental affordability problems. The high costs of land, labor, and materials for multifamily construction all present barriers to building more affordable housing. Recent studies of the Low-Income Housing Tax Credit (Housing Credit) program have shown that new construction projects financed with Housing Credits had per-unit total development costs that were nearly $60,000 higher than acquisition-rehabilitation projects. Preserving affordable housing is more cost-effective and a much “higher-yielding financial and social investment for the country than building new apartments for this group: preservation costs 30-50 percent less than developing new units.”

In recent years, rising rents in hot markets have created increased incentives for owners to opt out of participating in federal housing assistance. When properties become unaffordable just as neighborhoods improve, residents may be displaced, losing the opportunity to benefit from decreased crimes rates, and enhanced access to jobs, quality schools, and reliable transit that often comes with economic growth. Preserving affordable housing is fundamental to enabling residents to benefit from these opportunities. It also allows employers to fill critical jobs across the spectrum of wages without forcing the poorest workers to shoulder the burden of long and expensive commutes.

New construction of multifamily housing, especially properties serving low-income renters, often faces a lengthy local regulatory approval process and community opposition. Building new affordable housing in communities with access to opportunities is especially difficult considering the costs and political opposition often associated with constructing new rental housing in such places. By saving and improving existing affordable housing in “high opportunity” neighborhoods, preservation is an important tool for promoting equitable development. “Not In My Back Yard” (NIMBY) opposition does not exist when existing properties, already familiar to community members, are preserved as affordable.

In distressed neighborhoods, preserving affordable housing can catalyze the revitalization of an entire community. Saving decent, affordable housing means protecting a critical community asset. It also signals the reversal of years of neglect and disinvestments and can spark the public-private investment that is essential for community revitalization. In all communities, preservation protects the billions of taxpayer dollars already invested in affordable rental housing and results in a more environmentally sustainable and efficient use of resources.

Project-Based Rental Assistance: The Foundation of Preservation

Preserving or constructing affordable housing for low-income people requires multiple layers of funding. Often, HUD’s project-based rental assistance (PBRA) provides the foundation which leverages the

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2 Urban Land Institute, page 12.
3 Ibid, page 11.
additional resources needed to recapitalize rental properties and keep them affordable. One might think of PBRA as the base of a layer cake.

Project-based housing is a category of federally assisted housing produced through a public-private partnership to build and maintain affordable rental housing for low-income households. From 1965 to the mid-1980s, HUD provided financial incentives such as below-market interest rate loans, interest rate subsidies, or project-based rental assistance contracts. No additional units have been produced through those programs for many years, but Congress provides funding annually to renew PBRA contracts with private rental housing owners.

It’s important to understand the basic facts about PBRA:

- PBRA provides affordable housing for over 1.2 million low- and very low-income households across the country. Sixty-six percent of these households include a resident with a disability or who is elderly. The average household income is less than $13,000 per year.
- Preserving properties with PBRA assures that affordable rental homes will continue to be available in a wide range of housing markets throughout the nation, including urban, rural, and suburban locations. According to the Urban Institute, about 43 percent of all PBRA units are located in low-poverty neighborhoods nationally. These are communities where low-income families might otherwise be unable to find affordable housing.
- Properties with PBRA generate $460 million in property taxes for local municipalities annually and directly support 55,000 jobs.
- Nearly 10,000 of the 17,723 PBRA properties are insured by the Federal Housing Administration (FHA). The estimated unpaid balance of the FHA insured debt underlying properties assisted by PBRA contracts is over $13.5 billion. Without sufficient rental assistance, properties would be at risk of failure because they could not cover their debt. In this situation, FHA would be left paying the tab. In HUD’s own words, “If funding for the PBRA program is not provided, the value of this underlying debt to FHA and private lenders as well as existing equity in the physical structures could be severely eroded, contributing to significant loss of privately held wealth and community investment.”

As rental markets heat up, PBRA properties are at greater risk of being lost as affordable housing and converted to market rate housing. When PBRA contracts expire, owners may choose to opt out of their contracts, enabling them to increase rents to market levels or convert units to market-rate condominiums, thereby rendering apartments unaffordable to lower income tenants. Owners must give residents one-year advance notice of intent to opt out. Most residents will receive enhanced vouchers to enable them to remain in their homes, but future residents must pay market rents. According to the Urban Institute, of the approximately 1.34 million active PBRA units, more than 446,000 units (33 percent of the total PBRA stock) are at risk of losing their affordability status, according to calculations from the National Housing Preservation Database.4

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4 Urban Wire, How to keep affordable housing in high-opportunity neighborhoods, 2015
As you know, appropriations for PBRA increase annually to keep pace with rising market rents, as well as operating and maintenance costs. Maintaining market parity is critically important to deter owners from opting out and converting their properties to market-rate housing. Appropriations levels for contract renewals also rise annually due to RAD conversions to PBRA, although these resources are transferred from the public housing account. Despite the pressure that PBRA renewals place on the rest of the HUD budget, full funding is essential to ensure the ongoing success of this public-private partnership and the long-term affordability of this housing stock.

As HUD has noted, “Multifamily housing assisted by PBRA stabilizes neighborhoods and contributes to local economic bases. PBRA contracts act as a critical credit enhancement for project financing, allowing owners to leverage private debt and equity to permit project refinancing and recapitalization. The periodic refinancing of the debt underlying projects assisted by PBRA generates significant capital available for investment in construction repairs and improvements.”

**Additional Federal Resources and Tools Support Preservation**

The other layers of financing needed to preserve affordable rental housing include resources appropriated by Congress, Low-Income Housing Tax Credits, and federal incentives which leverage private investment. I will describe the importance of each resource briefly.

**HOME Investment Partnerships Program**

The HOME Investment Partnerships Program (HOME) provides grants to state and local governments to produce and preserve affordable housing for low-income families. Since 1990, over 1.3 million units of housing have been built or preserved with HOME funds. HOME uniquely empowers states and localities to respond to the housing needs they deem most urgent for their communities, including preservation. HOME provides essential soft funding to properties assisted by the Low-Income Housing Tax Credit (Housing Credit) and other resources. This makes affordable rental housing developments financially feasible and allows deeper income targeting to serve persons experiencing homelessness, seniors, veterans, and persons with disabilities.

From 2010-2017, 62 percent of all HOME funds used for rental projects were gap financing for Housing Credit developments, helping to fill the gap between the cost of developing affordable housing and the resources available. Thirty-six percent of HOME funds used for rental projects have been utilized for rehabilitation and 49 percent of HOME rental units are in properties that have been preserved. As a member of the HOME Coalition, NHT urges HUD to restore HOME funding to at least $1.5 billion in Fiscal Year (FY) 2020.

**Project-Based Vouchers**

Under HUD’s project-based voucher (PBV) program, a public housing authority (PHA) enters into an assistance contract with a property owner for specific housing units and a specified term. The rental assistance is tied to the unit. PHAs may “project-base” up to 20 percent of their authorized Housing Choice Vouchers (HCVs), and up to 30 percent if the additional units serve particular types of households or are located in specific areas. PBVs can support the preservation of affordable housing, since owners of properties with PBVs receive financial security from the long-term contracts they sign with PHAs. The
locations where PBVs are used must be consistent with the goal of deconcentrating poverty and expanding housing and economic opportunity, but PHAs have substantial discretion to make this judgment, as long as they consider certain HUD-specified factors.

**Rental Assistance Demonstration**

As part of the FY 2012 HUD appropriations act, Congress authorized the Rental Assistance Demonstration (RAD) to help preserve and improve low-income housing. RAD gives PHAs a powerful tool to preserve and improve public housing properties and address the $26 billion-dollar nationwide backlog of deferred maintenance. RAD also gives owners of three HUD "legacy" program (Rent Supplement, Rental Assistance Payment, and Section 8 Moderate Rehabilitation) the opportunity to enter into long-term contracts that facilitate the financing of improvements. In both components of RAD, federally assisted properties are converted to long-term PBRA or PBV contracts that, by law, must be renewed. This ensures that the units remain permanently affordable to low-income households.

RAD allows PHAs and owners of older assisted properties to leverage public and private debt and equity in order to reinvest in the housing stock. RAD is cost-neutral and does not increase HUD's budget. This program simply shifts units from the public housing program to the Section 8 program so that providers may leverage the private capital markets to make capital improvements. However, NHT asks Congress to provide a modest appropriation for the most complex RAD transactions (including RAD for PRAC - see below), which are be an important tool for preservation, particularly in competitive rental markets.

The FY 2018 Appropriations Act authorized the conversion of properties assisted by Section 202 Housing for the Elderly properties with Project Rental Assistance Contracts (PRACs). Between 1990 and 2012, Congress funded construction funds from Section 202 and supported the creation of approximately 2,800 properties serving over 120,000 households headed by very low-income seniors. These homes continue to receive their ongoing rental subsidies from HUD’s PRACs. In theory, the PRAC subsidy provides Section 202 sponsors, all of whom are nonprofits, with the difference between what communities’ very low-income older adult tenants can afford to pay for rent and the actual operating and maintenance costs of the community. Over the years, however, it has become clear that many PRAC communities have greater capital repair needs than can be met by PRAC funding.

The RAD for PRAC authorization addresses the fact that PRAC-funded communities previously have had no mechanism to bring in new capital to make needed repairs and improvements. Most of those Section 202 communities are still operated by the nonprofit owners that built them, but as the older adults who call these properties home have aged, the buildings themselves have become older and in need of repairs and upgrades to meet infrastructure demands and the changing needs of their residents. NHT strongly supported the authorization of RAD for PRAC as a preservation tool and will continue working with HUD as it implements this important initiative.

**Community Development Financial Institution Fund**

Community Development Financial Institutions (CDFIs) raise funds to finance predevelopment and interim development loans at below market rates to local nonprofit developers, which can assist the preservation of
affordable housing. The CDFI Fund, part of the U.S. Department of the Treasury, supports the creation and expands the capacity of CDFIs that specialize in providing affordable credit, capital, and financial services, including resources which enable the preservation of affordable rental housing. CDFI investments are leveraged many times over for greater impact. Adequate appropriations for the CDFI Fund are critical to ensuring that CDFIs can continue this important work.

**Low-Income Housing Tax Credits**

The Housing Credit and the related multifamily Housing Bond program are our nation’s most successful tools for encouraging private investment in the production and preservation of affordable rental housing and have been responsible for nearly all the affordable housing built and preserved in recent decades. Since 1986, these programs have financed over three million affordable apartments, providing approximately seven million low-income families, seniors, veterans, and people with disabilities homes they can afford. Many properties with PBRA and other federal assistance leverage Housing Credits for recapitalization to help make necessary repairs and ensure long-term affordability.

The Affordable Housing Credit Improvement Act (AHCIA), soon to be reintroduced in both the Senate and the House, is bipartisan legislation that would increase the annual Housing Credit allocation by 50 percent, phased in over five years, to make a meaningful step towards addressing our nation’s severe shortage of affordable rental housing. The bill also would make numerous modifications to strengthen the Housing Credit by providing additional support for the preservation of existing affordable housing, giving states added flexibility, making the financing of affordable housing more predictable and streamlined, facilitating Housing Credit development in challenging markets like rural and Native American communities, and increasing the Housing Credit’s ability to serve extremely low-income residents.

When the Housing Credit was first created in 1986, Congress set the 9 percent and 4 percent Credit rates to reflect market conditions of the time, but the rates were floating, fluctuating monthly according to a formula related to federal borrowing rates. Consequently, the applicable Credit rates historically have not been 9 percent and 4 percent. Recently, as interest rates have sunk to historic lows, Credit rates have been much lower than originally intended, resulting in less equity available to build affordable housing using the Housing Credit. Recognizing the issue of declining rates on the program, Congress permanently enacted a minimum 9 percent Credit rate in 2015 with bipartisan support. However, the floating 4 percent Credit rate still limits the equity available to build and preserve affordable rental homes. The AHCIA would fix the 4 percent Credit rate, filling critical financing gaps, providing more market certainty in Housing Credit financing, and allowing states more flexibility and discretion to finance high-priority developments. Locking in the 4 percent rate is especially important for preservation, because the 4 percent Credit is the single most critical tool for preserving existing affordable housing. NHT urges Congress to pass the AHCIA to expand and improve the Housing Credit program, enhancing resources for preservation.

**Federal Financing Bank Risk-Sharing Initiative**

NHT supported the Federal Financing Bank (FFB) initiative with Section 542c Federal Housing Administration (FHA)-Housing Finance Agency (HFA) Risk-Sharing, which provides a valuable financing tool for preserving and building affordable rental housing. The FFB Risk-Sharing initiative was started in
2015 to stimulate affordable housing production and preservation in response to tightening bond markets and a lack of private sector funding and liquidity that followed the financial crisis. Risk-Sharing has provided an important resource to support preservation. The FFB initiative was designed so that the FHA and state HFAs share in the risk of the mortgage, and works as follows:

- Participating HFAs enter into contracts with HUD that provide for reimbursement to HUD for a portion of any insured loss;
- HFAs use their own underwriting standards and assume at least 50 percent of the risk of loss; and
- “A” rated HFAs have access to capital funds provided by the FFB, a government corporation that purchases the obligations of federal agencies. The HFAs then lend those funds to private developers for projects that meet certain affordability criteria.

The Trump Administration terminated the FFB Risk-Sharing Initiative at the end of 2018. We urge Congress to take steps to renew this partnership in the interest of resumed preservation and construction of desperately needed affordable housing.

**Section 8(bb) Preservation Tool**

Section 8(bb) of the United States Housing Act of 1937 (42 U.S.C. 1437f(bb)) provides HUD with a tool for preserving PBRA budget authority. Under Section 8(bb), if a PBRA Housing Assistance Payments (HAP) contract is terminated or expires and is not renewed, HUD is authorized to transfer any remaining budget authority to either a new or an existing PBRA HAP contract, and provide assistance to eligible families, including those receiving PBRA at the time of the contract termination, under terms and conditions prescribed by HUD.

Currently, Section 8(bb) is underutilized because it is often difficult for mission-driven affordable housing organizations to determine when a HAP contract will become available and because HUD’s guidance directing the transfer process is cumbersome and confusing to both stakeholders and HUD field offices. NHT would like to see Section 8(bb) work better and provide a mechanism which ensures zero loss of project-based subsidy. We are actively engaged with HUD on how the use of this tool could be improved. We may look to Congress for help in making Section 8(bb) the most agile tool possible in the case of opt-outs.

**Federal Housing Finance Agency Oversight & Housing Finance Reform**

As the Federal Housing Finance Agency (FHFA) transitions to new leadership, NHT asks Congress to provide oversight to ensure that FHFA is continuing to enforce its Affordable Housing Goals and Duty to Serve regulatory responsibilities for the Government Sponsored Enterprises (GSEs), and to appropriately maintain the GSEs’ annual contributions to the Housing Trust Fund and the Capital Magnet Fund. The Housing Goals and the Duty to Serve provide strong incentives for Fannie Mae and Freddie Mac to invest in affordable housing preservation, and the Housing Trust Fund and the Capital Magnet Fund provide important resources which support preservation. FHFA’s Housing Goals, the Duty to Serve, the Housing
Trust Fund, and the Capital Magnet Fund also should be protected in any housing finance reform bill considered by the 116th Congress.

Additional Federal Initiatives Which Support Preservation

On behalf of NHT, I would like to express support for three initiatives which strengthen and enhance the preservation of affordable housing: 1) the Family Self-Sufficiency program; 2) efforts to improve HUD’s REAC and enforcement protocols; and 3) the need to invest in energy efficient affordable housing as part of our nation’s infrastructure.

Family Self-Sufficiency (FSS) Program

The Family Self-Sufficiency (FSS) program does not facilitate preservation, but directly helps HUD-assisted residents to become economically mobile. FSS is the largest asset building program for low-income families in the country. FSS offers service coordination and financial coaching to residents of assisted housing, plus escrow accounts that capture their increased rent payments due to increased earnings. Participating families can use these savings to meet their goals when they graduate from the program. Currently, there are 75,000 families enrolled in FSS, a fraction of the families living in assisted housing.

In 2018, the Congress passed, and the President signed into law legislation that makes program improvements and permanently authorizes FSS for properties with PBRA. NHT strongly supported this authorization and deeply appreciated that Congress appropriated a $5 million increase in funding for FSS coordinators in FY 2019, to support this newly authorized expansion to PBRA communities. Along with many affordable housing partners, we strongly support an additional increase in the funding for service coordinators for FSS in the FY 2020 spending bill.

FSS is a robust, time-tested approach that balances the need to both set rents in assisted housing according to what residents can pay, but also to improve economic mobility. FSS’ proven formula of stable affordable housing with service coordination and escrow accounts is much more likely to be successful than punitive rent increases and work requirements for extremely low-income people. A recent interim cost-benefit analysis of two high-performing FSS programs in New England showed that every $100 in net cost to run the program returned $3,600 in income to the participating family.

The permanent authorization of FSS in PBRA properties opens a new universe of residents who could benefit from the asset building benefits of FSS. Based on available data, we estimate that an increase of $25 million (relative to a $75 million baseline) would allow HUD to fund 448 additional FSS coordinators, who could collectively serve as many as 33,600 additional families. PBRA owners can use residual receipts to fund FSS service coordinators, but residual receipts are not evenly distributed throughout the PBRA inventory. Most accumulated residual receipts have been swept by HUD in recent years, so this is not a viable upfront funding source for most properties. While some properties may generate residual receipts in future years, this is an uncertain and uneven funding source inadequate to provide the stability needed for an FSS program. Properties that have a willing, motivated owner that would like to offer FSS may not be the properties that have money in the residual receipts accounts. Expanding the service coordinator account would enable PBRA owners to compete for this funding.
Real Estate Assessment Center / HUD Enforcement

Preserving affordable housing implicitly includes a commitment to keeping properties in good condition where residents can live safely and healthfully. The vast majority of properties with PBRA are maintained well, but NHT shares concerns about isolated cases of negligence. In light of recent media reports of HUD-assisted housing being poorly maintained, HUD is currently reexamining how the Department conducts Real Estate Assessment Center (REAC) inspections and considering how to improve its inspection and enforcement protocols for assisted properties.

NHT has long advocated for strategies to maintain the quality and sustainability of the assisted multifamily housing stock, as well as a long-term commitment to its affordability. We believe that these issues are best addressed by broader utilization and more consistent application and coordination of HUD’s existing property monitoring and enforcement tools. NHT supports a reexamination of these issues, but we urge Congress to call upon HUD to fully engage with industry stakeholders and residents and carefully consider their input before making any changes to existing systems. More specifically, we encourage the Department to explore proactive steps like periodic resident surveys and increasing HUD and owner accountability, as well as remedies like rent abatements and receiverships.

Energy Efficient Housing as Infrastructure

NHT believes that investing in the energy efficiency of assisted housing is a way to preserve that housing. Lack of energy and water efficiency is costly. Nowhere is this more evident than in publicly and privately-owned housing that is affordable to low-income residents. Low-income families spend an average of 7.2 percent of their income on energy bills, as compared to two percent by high-income households. The average PHA spends 22 percent of its operating budget on energy and water. In privately-owned properties financed with equity from Housing Credits, utilities made up 18 percent of operating expenses. In assisted housing, lower energy consumption reduces government subsidy costs and helps preserve these long-term investments by reducing operating costs and improving the long-term financial stability of the property.

Many states require utilities to invest in programs that support energy efficiency, but significant work remains to ensure that meaningful savings and benefits are realized in affordable multifamily housing. Federal investment is needed to leverage utility company and other private financing sources, and further incentivize private investment in efficient affordable housing infrastructure, by ensuring that owners can benefit from utility cost savings and by expanding pay for success programs.

Public investments in infrastructure that enhance efficiency make good financial sense. They offer the chance to leverage public and private funds for short and long-term savings, job creation and greater opportunity for residents. Updating energy and water systems creates healthier homes for residents and establishes a better platform for their success. For example, healthy indoor air systems can significantly mitigate the consequences of asthma in a child or chronic respiratory disease in seniors.

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6 Federal Register/Vol. 81, No 192/Tuesday, October 4, 2016/Notices/FR-5913-N-27
7 Novogradac & Company, 2015 Multifamily Rental Housing Operating Expense Report
If Congress considers an infrastructure bill in the coming year, we urge Members to include investments in energy efficient, healthy affordable housing as a key component of the nation’s infrastructure. Updating our outdated housing infrastructure can create high paying jobs and help preserve housing by addressing a backlog of physical repairs needed to improve safety and quality of life in publicly assisted housing.

Conclusion

The preservation of existing affordable housing is critical to solving our nation’s rental housing affordability crisis. Strong congressional championship is needed for federal appropriations, tax credits, and incentives which support the preservation of affordable rental housing, as well as services that help low-income residents access opportunity and develop economic self-sufficiency. The American people need affordable housing now more than ever. Preservation is the most cost-effective way to ensure we do not lose any of the precious housing assets currently meeting that need. A variety of federal tools must be utilized to ensure that we preserve those properties.