



Rural Delivery

New York State Rural Housing Coalition, Inc.

May, 2015

Section 502 Final Rule To Go Into Effect

On April 29th, USDA released its Final Rule on the Section 502 Direct Loan Packaging Program. The rule goes into effect on July 28, 2015.

In 2010, USDA launched the packaging program to explore new ways to expedite and streamline processing of Section 502 Direct Loans. Together, trained packagers and intermediaries have made significant progress in reducing processing times, proving that collaboration between the agency and its nonprofit partners can help USDA better serve rural families.

The Final Rule addresses the public comments USDA received after the rule was first proposed in August 2013. This includes comments on the role of intermediaries, packaging fees and compensation, the impact on small nonprofits, priority for packaged loans, compliance with the SAFE Act, and other issues.

The Final Rule attempts to address the “successes and shortcomings” in the intermediary pilot program that was launched in 2010 by strengthening the requirements to be an intermediary, while relaxing the requirements to be a qualified employer in order to allow startups to participate. According to the Final Rule, a qualified employer is an organization that employs certified packaging staff.

Specifically, the Final Rule states that packaged loans must go through an intermediary before being submitted to USDA, unless a qualified employer obtains approval from the State Rural Development Director if the quality of their application packages are sufficient. If performance issues arise, the qualified employer may be required to submit their packages through an intermediary.

Moreover, the Final Rule provides that intermediaries will be required to provide training and technical assistance in order to improve the performance of loan packagers. All intermediaries must be a nonprofit organization or public agency in good standing, have the capacity to promptly serve multiple qualified employers, be financially viable, and have experience packaging, originating, or underwriting affordable housing loans.

Because intermediaries that currently participate in the pilot program are not guaranteed a role when the Final Rule becomes effective, they must re-apply.

According to the Final Rule, the packaging fee “may not exceed 2 percent of the national average area loan limit” and “may be further limited at the Agency’s discretion.” Initially, the Handbook will specify that the fee may be up to a total of

\$1,500. Packagers and intermediaries must negotiate between themselves how the fee will be split. Fees are only allowed for closed loans.

In response to comments that the requirements to become a certified packager would adversely impact small nonprofits, the Final Rule allows nonprofits that submit loan applications outside of the program to collect a nominal fee of no more than \$350.

The Final Rule does not provide priority processing for loans packaged under this program, “unless the Administrator decides that such a temporary classification is necessary.” If the Administrator decides to implement a temporary priority, this decision will be published in a Federal Register notice.

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Rural Delivery

Rural Delivery is published by the
New York State Rural Housing Coalition, Inc.

The Coalition is a non-profit statewide membership organization dedicated to strengthening and revitalizing rural New York by assisting housing and community development providers.

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Rural Delivery is published monthly and delivered electronically to a mailing list of 200 community development professionals and policy makers.

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Bits and Pieces...

Webinar on HUD's Proposed VAWA Regulations

The National Housing Law Project will conduct a webinar summarizing and analyzing the proposed changes to various HUD program regulations in response to the Violence Against Women Reauthorization Act of 2013 (VAWA 2013). The free webinar will be held on Thursday, May 21st at 2:00 PM.

The webinar is designed for advocates and others who have a basic understanding of VAWA 2013's provisions and would like to learn about HUD's proposed rule. The National Housing Law Project has a summary at <http://nhlp.org/files/VAWA-2013-Bulletin-Article-Jan-2014-updated.pdf>. Register for the webinar at <https://attendee.gotowebinar.com/register/1480030977495446274>.

Communicating The Need For Water Efficiency

HUD will host a webinar on water efficiency at the end of May. The WaterSense program has a variety of consumer campaigns that can be used to amplify water conservation messages and help consumers adopt water-efficient behaviors. Veronica Blette will review the WaterSense program's campaigns and associated promotional materials. Joanna Ladd of the Chinatown Community Development Center—which owns and manages twenty five properties throughout San Francisco and provides affordable housing to over 2400 low income families and seniors—will speak about their water efficiency work and the importance of education and outreach efforts. The session will be held on May 27th, from 2:00–3:00 PM. To register, visit <https://attendee.gotowebinar.com/register/8174448205132361986>.

Federal and U.S. military employees can support the Rural Housing Coalition through the annual Combined Federal Campaign (CFC). If you are a federal government or military employee and would like to donate through the CFC, please enter CFC code #9614 on your pledge card during the next fund drive.

Rule Prohibits Cost Of NHTF And CMF To Be Passed On To Loan Originators

The Federal Housing Finance Agency (FHFA) issued a final rule on March 26th implementing the prohibition against Fannie Mae and Freddie Mac passing the cost of the assessment they are required to pay to fund the National Housing Trust Fund (NHTF) and the Capital Magnet Fund (CMF) on to the originators of the loans the GSEs purchase or securitize. An interim rule was published for comment on December 16, 2014. The final rule makes no changes from the interim rule.

The NHTF and the CMF are to be funded by dedicated resources deriving from assessments of 4.2 basis points (0.042%) on the new business of Fannie Mae and Freddie Mac. The Housing and Economic Recovery Act of 2008, which established the NHTF and the CMF, requires the FHFA Director to establish a regulation prohibiting Fannie and Freddie from passing the 4.2 basis point assessment on to loan originators.

New business refers to the un-

paid principal balance of Fannie and Freddie's total new business purchases, which are the single- and multi-family residential mortgage loans or re-financings acquired by the companies and held in their portfolios or that support securities, notes, or other obligations that Fannie and Freddie guarantee.

This provision in law is meant to prevent the cost of the NHTF and CMF from increasing the cost of mortgage lending. It refutes the argument raised by some NHTF and CMF critics that the fee will be passed on to people taking out home mortgages.

The final rule is at www.gpo.gov/fdsys/pkg/FR-2015-03-26/pdf/2015-06724.pdf.

The interim rule is at www.gpo.gov/fdsys/pkg/FR-2014-12-16/pdf/2014-29345.pdf. For more information about NHTF funding, see pages 3-10 of the National Low Income Housing Coalition's 2015 Advocates' Guide at http://nlihc.org/sites/default/files/AG_2015_FINAL.pdf.

76West Competition Opens

Governor Cuomo announced the 76West competition for business growth in the Southern Tier on April 29th. The competition makes available \$20 million to encourage business development and provide business support services for businesses in the clean energy sector. Funding levels will range from \$100,000 to \$1 million.

As a condition of the competition, it is expected that winners will be in or move their operations to Allegany, Broome, Cattaraugus, Chautauqua, Chemung, Chenango, Delaware, Schuyler, Steuben, Tompkins or Tioga counties.

The competition will be measured by the amount of private capital invested in clean energy technology businesses in the region, strategic partnerships formed with leading private firms and institutions, and the commercialization of new clean energy technology products.

In addition to the \$10 million business competition, 76West will offer \$10 million of business support services to the local clean energy market. Services may include access to entrepreneurial training programs, incubators, and networking events. The initiative is expected to launch this fall

Housing Counseling Grants Announced

HUD announced the 2015 Housing Counseling awards on April 14th. Awardees included:

ACCORD Corp; CASH, Inc.; Franklin County Community Housing Council; Keuka Housing Council; Metro-Interfaith Services; and Steuben Churchpeople Against Poverty (Arbor Development). Funding was awarded to a number of intermediaries, including the NY Mortgage Coalition and the NY Housing Finance Agency. All told, NY will receive \$2.1 million in housing counseling funds, although \$1.1 million of the total will go to national intermediaries based in New York, possibly for use outside the state. See the entire award list at <http://portal.hud.gov/hudportal/documents/huddoc?id=2015StateLocalHCGrantees.pdf>.

NonProfit Times Publishes Outcome Metrics White Paper

A white paper on outcome metrics for non-profits has been published online. Amid increasing demand for transparency and accountability, today's nonprofits are seeking ways to both produce and to demonstrate successful outcomes. To meet this demand, nonprofit organizations are embracing outcome metrics to measure and report their performance. Outcome metrics not only show funders and constituents how the organization is performing; they also help pave the way for sustainable growth and greater efficiency. This paper explains how nonprofits can effectively leverage outcome metrics to boost their success. The free paper is available at www.thenonprofittimes.com/library/outcome-metrics-measuring-what-matters-in-the-nonprofit-world/?download=1.

Project Profile: Community Action In Self Help, Inc. To Open Coffee Shop and Artisan Cooperative

In our regular feature, Rural Delivery invites members of the Rural Housing Coalition to highlight their community development projects and programs in the pages of this newsletter. This month, we are pleased to present CASH's latest project, a Main Street revitalization initiative. In their own words, here is their story:

Community Action in Self Help, Inc. is a small housing and community development agency located in Lyons and serving Wayne County and the Towns of Manchester and Phelps. Founded in 1970, the Agency has implemented a wide array of housing focused programs to fulfill its mission that "...everyone is entitled to decent, safe, sanitary and affordable housing, regardless of race, color creed or personal circumstances." During this time, the Agency's community development work had mostly focused on partnerships with other agencies and community wide efforts. That has changed though with its latest project: a coffee shop and artisan cooperative.

Like many small upstate NY towns, the "Main Street" in Lyons has been on a decline for several decades. What was once a prosperous business district located along the Erie Canal, now has a number of vacant storefronts that are rapidly deteriorating. The Agency heard frequently from residents, existing business owners and other agencies about the need to spruce up downtown buildings, attract more businesses, and create more quality affordable rental housing. Nearly four years ago, Community Action in Self Help, Inc. started down the path to addressing these concerns.

The Agency began meeting with local government officials, community leaders, local businesses and building owners, and other human service agencies to devise a plan. In 2013, after two years of planning, the Community Action in Self Help, Inc. was awarded two grants through the NYS Consolidated Funding Application process and NYS Homes and Community Renewal: a Main Street Grant and Rural Area Revitalization Program grant (RARP)

The Main Street Grant has provided funding for the Agency to work with building owners in the downtown Lyons business district to make improvements to their buildings, both commercial and residential space, as well as facade improvements. The RARP is funding the rehabilitation of the JJ Newberry Building, also in the business district, to transform it into the coffee shop, artisan cooperative, and antique co-op and serve as an anchor for the revitalization of the downtown area.

The artisan cooperative will feature art, furniture, jewelry, candles and other "cottage industry" goods produced in Wayne County. The effect will be to not just showcase the very best that Wayne County has to offer, but also give these small artists and businesses a "Main Street

presence" they couldn't otherwise afford. The coffee shop will feature a breakfast and lunch menu and desserts. Like the artisan cooperative, the coffee shop will source many ingredients and food items from local producers, including local farmers and bakers. A commercial kitchen will allow small food businesses to rent space in a permitted kitchen to bake and cook their items and will also provide space for cooking classes.

The Agency is partnering with local schools to feature student art, as well as musical performances in the evening from student bands and vocal groups. As with all projects Community Action in Self Help, Inc. undertakes, the Agency is also working hard to support local businesses. We are using local contractors and building supply companies for the rehab of the building, and once open will feature deals such as "Dinner, Movie and Dessert" with local restaurants and the local theater.

Rehab of the building has begun and the Agency expects to open this fall. To follow along with the project, please visit the Agency website at www.cashinc.org.



The old Newberry's facade

Save The Dates!!
September 16, 17, and 18, 2015
Lake Ontario Conference Center
Oswego, NY
for the
2015 Affordable Housing & Community Development Conference

Vice President for Field and Communications

The National Low Income Housing Coalition seeks to hire a Vice President for Field and Communications to direct all field and communications efforts. Applicants must have a Bachelor's degree plus ten years of supervisory management and leadership experience, or a Master's degree plus five years of supervisory management and leadership experience. They must have a demonstrated ability to lead teams in a diverse, fast-paced environment. Applicants should have experience and familiarity with housing, poverty, homelessness, affordable housing policy, affordable housing development, or social service delivery. Experience in coalition/association leadership, organizing, communications, public affairs, and/or marketing are preferred. Applicants must have very strong written and oral communications skills, strong organizational skills, and attention to detail. Applicants must have a deep commitment to social justice. This is a full-time position located in Washington, DC.

Interested candidates should submit a resume, cover letter with salary requirement, and two writing samples to Paul Kealey, Chief Operating Officer, NLIHC, at pkealey@nlihc.org. EOE

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The Final Rule removes the monthly reporting requirement, along with reference to the SAFE Act because USDA does not have the authority to enforce or monitor compliance under this regulation. Moreover, USDA does not believe that the SAFE Act applies to loan packagers because they do not qualify as "mortgage loan originators."

Self-Help Housing Projects and

Career Opportunities

Fair and Equitable Housing Specialist, Albany Region

The Fair and Equitable Housing Office focuses on the development of a pro-active approach to removing regulatory barriers at the state level and affirmatively furthering fair housing. We look at how our public investments affect the larger housing market, and engage our partners to ensure affordable housing is available in all areas of the State.

Responsibilities: Develop materials to educate stakeholders about the agency's fair and equitable housing initiatives; Assist with fair and equitable housing media campaigns; Assist with the development of the State's Analysis of Impediments to Fair Housing Choice; Research, analyze and draft memoranda on policy issues pertaining to housing discrimination and affirmatively furthering fair housing.

Qualifications: Candidate should be well-organized, detail-oriented and able to work effectively both independently and in a diverse group. Candidate should have excellent oral and written communication skills, and experience in Microsoft Office applications. GIS mapping experience is a plus. Bachelor's or master's degree in sociology, geography and planning or public administration with 3-5 years' experience in affordable housing, fair housing or civil rights. Prefer candidate possessing a keen interest in social justice and public service.

What we offer: Exciting opportunity to be part of New York's resurgence to greatness; Extensive benefits package including paid leave, excellent health, dental, vision and retirement benefits; Promotional opportunity for dedicated professionals.

TO APPLY, please send resume and cover letter to: jobopportunities@ny-shcr.org with the subject "Fair and Equitable Housing Specialist". EOE

The New York State Rural Housing Coalition is happy to be able to provide help wanted advertising opportunities for our members and non-profit community development agencies. Ad copy must be provided in Microsoft Word format, and may be transmitted by email to colin@ruralhousing.org. Ad copy must comply with federal and state equal opportunity requirements to be published, and must be received by the 25th of the month to ensure placement in the succeeding issue of *Rural Delivery*. Ads provided in this fashion will also be posted in the Career Opportunities page of the Coalition's website, unless a request is specifically made not to place the advertisement on-line.

Section 502 Final Rule, Cont'

loans are excluded from the loan packaging process and may not be charged a packaging fee. Grantees may participate in the process for non-Self-Help Housing loans if they meet the criteria.

Some commenters asked USDA to notify packagers and intermediaries when a loan they packaged goes into default, so that they can help the homeowner get back on track and avoid foreclosure. The Handbook currently allows a borrower

to waive their privacy rights in order to allow the Agency to share information about loan applications with the packager and intermediary. The current waiver terminates at loan closing, but the Final Rule states that changes can be made if/when the loan servicing system can be configured to issue servicing notifications to the packager as well.

The Final Rule does not allow packagers or intermediaries to order credit reports or appraisals.

Proposed VAWA Regulations Published

On April 1st, HUD published proposed regulations implementing the Violence Against Women Act Reauthorization of 2013. VAWA, which pertains to many federal programs, provides protections and services for victims of domestic violence, dating violence, sexual assault, and stalking.

The 2013 reauthorization expanded VAWA beyond public housing and vouchers to a number of other HUD programs. In the context of HUD programs, being a victim of domestic violence, dating violence, sexual assault, or stalking cannot be the basis for denial of assistance or admission to assisted rental housing. VAWA also has requirements regarding notification to tenants of

their rights and protections under VAWA, provisions regarding the rights and responsibilities of public housing agencies and of owners and managers of assisted housing, provisions pertaining to acceptable documentation of incidents of domestic violence and related acts, and provisions regarding maintaining the confidentiality of victims. As the preamble to the proposed rule notes, although VAWA refers specifically to women in its title, the statute makes clear that the protections are for all victims, regardless of sex, gender identity, sexual orientation, or age.

Comments are due by June 1st. The proposed rule is at www.gpo.gov/fdsys/pkg/FR-2015-04-01/pdf/2015-06781.pdf.

RFP Issued For Human Services

Transportation Coordination Plan Update

The Ulster County Planning Department has issued a Request for Proposals to solicit responses from qualified consulting firms to assist Ulster County Transportation Committee staff in updating its 2010 Human Services Transportation Coordination Plan.

The update will fulfill the requirements first enacted in 2005 with the passage of the Safe, Accountable, Flexible, Efficient Transportation, Equity Act: A Legacy for Users (SAFETEA-LU) which stipulated starting the Fiscal Year 2007 projects funded through three SAFETEA-LU programs – the Job Access and Reverse Commute Program (JARC, Section 5316), the New Freedom Program (Section 5317), and the Formula Program for Elderly Individuals and Individuals with Disabilities (Section 5310) are required to be derived from a locally developed coordinated public transit –human services transportation plan.

In June of 2012, Congress enacted a new two-year federal surface transportation authorization, Moving Ahead for Progress in the 21st Century (MAP -21). Under MAP-21, the Formula Grants for enhanced Mobility of Seniors and Individuals with Disabilities is the only funding program with coordinated planning requirements. The Plan is intended to meet this requirement while providing a “blueprint” for implementing a range of strategies to advance local coordination efforts to improve all transportation services.

The deadline for submission of replies is May 29th. For more information, contact: Carol Ann Armstrong, Senior Buyer, Ulster County Purchasing, 244 Fair St 3rd Floor. Kingston, NY 12401. Phone (845) 340-3405 or by email to: carm@co.ulster.ny.us.

Harriet Tregoning Takes Lead at CPD

On April 13th, HUD announced that Harriet Tregoning assumed the role of Principal Deputy Assistant Secretary of the Office of Community Planning and Development (CPD). Due to a vacancy in the position of Assistant Secretary, the Principal Deputy Assistant Secretary is the highest-ranking official within CPD, which oversees the National Housing Trust Fund, HOME Investments Partnership, Community Development Block Grant, Housing for Persons with AIDS, and homeless assistance programs.

Previously, Ms. Tregoning was the Director of HUD’s Office of Economic Resilience (OER) within CPD. Danielle Arigoni, currently Deputy Director of OER, will assume the role of Acting Director. Prior to joining HUD in early 2014, Ms. Tregoning was the Director of the District of Columbia Office of Planning.

“Harriet’s almost 20 years of experience in forward-thinking community development will be an asset to her as she transitions into this new leadership position,” HUD Secretary Julián Castro said in a letter to HUD staff.

Ms. Tregoning is the third person to be named to the position of Principal Deputy Assistant Secretary of a HUD office. Lourdes Castro Ramirez was named Principal Deputy Assistant Secretary of the Office of Public and Indian Housing (PIH) after her nomination to be Assistant Secretary for PIH stalled in the US Senate. More recently, Ed Golding was named Principal Deputy Assistant Secretary of the Office of Housing. All three are expected to lead their respective offices for the remainder of the Obama Administration.

Bill Introduced to Block Affirmatively Furthering Fair Housing Rule

On April 23rd, Arizona Representative Paul Gosar introduced the Local Zoning and Property Rights Protection Act (HR 1995) that would prohibit HUD from implementing its proposed Affirmatively Furthering Fair Housing (AFFH) rule. The final AFFH rule has been at the Office of Information and Regulatory Affairs at the Office of Management and Budget since January 10th and is expected to be published later this spring or early summer.

Specifically, the bill would require HUD to withdraw both the proposed AFFH rule, published in the Federal Register on July 19, 2013, and the notice on the AFFH Assessment Tool published in the Federal Register on September 26, 2014.

The Fair Housing Act of 1968 prohibits housing discrimination on the basis of race, color, religion, sex, familial status, national origin, or handicap – the “protected classes” of people. The act also requires HUD’s program participants to take steps to actively overcome historic patterns of segregation and promote fair housing choice. Advocates and many others recognize that the current practice of affirmatively furthering fair housing choice has not been effective. The new rule is expected to be an improvement.

Mr. Gosar’s bill would also require HUD to consult with states, local governments, and public housing agencies in developing recom-

mendations to affirmatively further fair housing in a manner consistent with the Supreme Court’s jurisprudence on federalism. The consultation must “represent a broad cross-section of regional, economic, and geographic perspectives in the United States, ... allow for meaningful and timely input,” and explore whether AFFH objectives can be achieved without federal regulations.

The results of the consultation would then be published as a draft report in the Federal Register, describing any regulatory proposals or unresolved policy disagreements. The report would then be open for public review and comment. After reviewing public comments, HUD, in consultation with state and local officials, would issue a final report.

When introducing the bill, Mr. Gosar stated, “Similar to other big government policies from [the Obama] administration, the flawed AFFH regulation will result in more harm than good by way of increased taxes, depressed property values, and further harm to impoverished communities. This is extortion and the Obama Administration should not be mandating that millions of dollars in grant money for local communities be dependent on turning over local zoning decisions to the federal government. Local zoning decisions have traditionally been, and should always be, made by local communities and municipalities. American citizens should

be free to choose where they would like to live and not be subject to neighborhood engineering and gerrymandering at the behest of an overreaching federal government.”

The bill was referred to the House Committee on the Judiciary and has been co-sponsored by Representatives Brian Babin (R-TX), Marsha Blackburn (R-TN), Jim Bridenstine (R-OK), Rick Crawford (R-AR), Scott DesJarlais (R-LA), John Duncan (R-TN), Stephen Fincher (R-TN), Trent Franks (R-AZ), Louie Gohmert (R-TX), Glenn Grothman (R-WI), Doug LaMalfa (R-CA), Cynthia Lummis (R-WY), Tom Massie (R-KY), Tom McClintock (R-CA), Ted Poe (R-TX), Pete Sessions (R-TX), Randy Weber (R-TX), Lynn Westmoreland (R-GA), and Ted Yoho (R-FL).

In the 113th Congress, Mr. Gosar introduced an amendment to the House Appropriations bill (HR 4745) that would have prohibited any FY15 funds from being used to implement, administer, or enforce the proposed AFFH rule. That amendment passed by a vote of 219 to 207 but was not included in final FY15 spending bill.

Mr. Gosar’s press release is at <http://gosar.house.gov/press-release/rep-gosar-introduces-bill-protect-local-zoning-decisions-new-obama-regulation>. The text of the bill is at http://gosar.house.gov/sites/gosar.house.gov/files/GOSAR_038_xml.pdf.

USDA Seeks Applications To Improve Rural Housing In New York

Funds are available to help rural residents of New York purchase or repair single family homes. “Expanding and preserving homeownership is a major part of the foundation for a stronger, more prosperous rural New York,” said Jennifer

Jackson, USDA Rural Development New York Single Family Housing Director.

Funding is available through three Rural Development housing programs; the Section 504 Single Family Housing Home Repair Pro-

gram, the Section 502 Direct and Guaranteed Rural Housing (home purchase) programs.

For more information on these programs and how to apply, please contact USDA Rural Development at (315) 477-6416.

HUD Report on Rental Market Dynamics Released

A report released by HUD the week of April 13th shows that between 2009 and 2011, the number of affordable rental units increased, but made up a smaller share of the overall rental stock. HUD's Rental Market Dynamics report, based on the biennial American Housing Survey, focuses specifically on trends related to rental affordability.

The analysis breaks down rental units into eight affordability categories. The three most affordable categories are non-Market (either zero rent or a subsidized rent), extremely low rent (affordable to renters with incomes less than or equal to 30% of local area median income (AMI), and very low rent (affordable to renters with incomes greater than 30% but less than or equal to 50% of local AMI).

From 2009 to 2011, the rental stock grew by almost 3.3 million units, including an increase of 1.0 million units in the three most affordable categories. The largest increase came from units that were

previously in the owner-occupied or seasonal stock, with a net addition of 2.1 million units, 695,000 of which were in one of the most affordable categories. Another 49,000 units were added to the most affordable categories as they filtered down from a lesser affordable category. The most affordable categories also gained 278,000 units due to a shift in the weights applied to the units in the sample survey. There was a net loss of 15,000 units because the stock of the most affordable categories lost more units than were newly constructed. The remaining growth in the number of rental units in the three most affordable categories can be attributed to a net inflow of units from the least affordable categories (49,000), and a shift in the weights applied to the units in the survey sample (278,000).

Despite the addition of one million units that were affordable at the three most affordable brackets, the share of these affordable rentals continued to decrease. The rental

market share of the three most affordable categories fell from 44.8% in 2009 to 43.7% in 2011. The increase in units, but decrease in rental market share can be explained by the decreasing homeownership rate. Homeownership peaked in 2005 at 69.2%, but fell to 63.9% in the fourth quarter of 2014.

The analysis illustrates that the housing market is showing signs of recovery, but the decline in homeownership and the falling share of affordable units indicate that the housing market still lacks affordable rental housing.

A limitation to this technical report is that it is difficult to ask respondents in a general survey about whether their home is subsidized. As a result the American Housing Survey definition of subsidized housing is somewhat broad and imprecise.

Rental Market Dynamics is at www.huduser.org/portal/datasets/cinch/cinch11/Rental_Mrkt_09-11.pdf.

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Illegitimi Non Carborundum