



Regulations Division
Office of the General Counsel
U.S. Department of Housing and Urban Development
451 7th Street, S.W. Washington, D.C. 20410

RE: FR-6520-P-01 ESTABLISHING FLEXIBILITY FOR IMPLEMENTATION OF WORK
REQUIREMENTS AND TERM LIMITS

Dear Secretary Turner,

The Chicagoland Apartment Association (CAA) is grateful for the opportunity to provide comments on the U.S. Department of Housing and Urban Development's (HUD) Proposed Rule *Establishing Flexibility for Implementation of Work Requirements and Term Limits*.

CAA is the leading trade association for over 250 rental housing owners, managers and developers in Illinois. As HUD considers this proposal, our association asks that you evaluate how these new requirements could impact the practical operation of rental housing in our community.

CAA appreciates HUD's commitment to increase flexibility and allow housing providers of assisted housing to tailor work requirements and term limits on assistance that best fit their unique needs. This same flexibility, however, may create operational challenges for housing providers when granted to Public Housing Agencies (PHAs).

According to the proposed rule, housing providers could be required to comply with a patchwork of inconsistent policies imposed by the PHAs with which they partner locally. In Illinois alone, there are 105 PHAs operating with vastly different systems for managing federal housing programs like the Section 8 Housing Choice Voucher (HCV) program.

Additionally, a single PHA could also impose a different term limit for each rental assistance program it administers, depending on the agency's housing goals. This could make the administrative burden to track individual households' compliance unworkable for on-site teams and introduce financial risk from terminations of tenancy and turnover costs that could increase substantially.

CAA and its members value our partnership with HUD and PHAs and strongly support federal rental assistance programs, including Section 8, that this proposed rule would affect. We look forward to working with you to strengthen these programs and improve renters' access to quality, affordable housing. Thank you for considering our unique perspectives.

Sincerely,

A handwritten signature in dark ink, reading "Michael J. Mini". The signature is written in a cursive, flowing style.

Michael Mini
Executive Vice President
Chicagoland Apartment Association