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September 26, 2014

The Honorable Thomas J. Vilsack
Secretary of Agriculture
Washington, DC 20250

Dear Secretary Vilsack:

I write on behalf of the over one million members of the National Association of REALTORS® (NAR) about community eligibility guidelines for Rural Housing Service (RHS) direct and guaranteed loan programs. NAR is America's largest trade association, including our eight affiliated Institutes, Societies and Councils. REALTORS® are involved in all aspects of the residential and commercial real estate industries and belong to one or more of some 1,400 local associations or boards, and 54 state and territory associations of REALTORS®.

Across rural America, RHS loan programs provide both rental and homeownership housing opportunities for rural families. As our economic and housing recovery continues, access to these programs is crucial. As you know, rural citizens face unique challenges finding access to credit. In recent months, NAR members have expressed concerns about communities becoming ineligible for RHS loan programs based solely on the "rural in character" criteria. In response to our members' concerns, NAR is encouraged to hear that you suspended work on determinations and any designations that would make a place ineligible based solely on "rural in character" criteria until the end of September 2015.

As you review the decision-making processes related to "rural in character" determinations, NAR urges RHS to implement a consistent and transparent process across all states. Communities deserve to fully understand the criteria evaluated for eligibility. While the RHS program handbook directs State Offices to notify the public of any designation changes proposed, NAR is encouraged to hear that RHS will evaluate and standardize the communications process to ensure time for public comment and consideration before final designations are issued. Communities need a better process to request re-designation if they disagree with their respective state office's eligibility determinations.

NAR looks forward to working with you to ensure that our rural citizens continue to have access to housing opportunities. If you have any questions regarding this letter, please contact me or our Regulatory Policy Representative, Sarah Young, at 202-383-1233 or scyong@realtors.org.

Sincerely,

Steve Brown
2014 President, National Association of REALTORS®

