NCDA WASHINGTON REPORT

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2004 Annual Conference: Portland, Oregon; May 17- 22, 2004
"CDBG Basics: Training for Practitioners" May 17-19, 2004; Portland, Oregon

FEATURED ARTICLES

- ***USCM President Garner Testifies on HUD Appropriations***
- ***Under Fire, Acting Secretary Jackson Pulls RESPA Reform Rule***
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USCM PRESIDENT GARNER TESTIFIES ON HUD APPROPRIATIONS

How would you describe the perfect witness to testify on behalf of local governments for HUD programs? Perhaps it would be the president of an influential public interest group who also happens to be a Republican mayor and a candidate for the House of Representatives. Perhaps, as an added bonus, this individual could come from the same state as the Chairman of the VA/HUD Appropriations subcommittee. Indeed, it was James A. Garner, president of the United States Conference of Mayors and Mayor of Hempstead, New York, who appeared before the subcommittee on March 24 to make our case.
As predicted, Mayor Garner was a big hit. Members on the Subcommittee responded in a manner that can only be described a "gushingly laudatory." Some members such as Marcey Kapture were so pleased with Garner's presence, she felt compelled to "testify" on his behalf. She told the Mayor that his testimony was right on point, and that it addressed all the major concerns. Chairman Walsh also recognized and was complementary of the Mayor. Lets just hope that they remember Mayor Garner during mark-up. A copy of the Mayor Garner's testimony is attached to this newsletter.

UNDER FIRE, ACTING SECRETARY JACKSON PULLS RESPA REFORM RULE

A classic example of eyebrow-raising timing by Acting HUD Secretary Alphonso Jackson has set tongues wagging in Washington. Less than a month after enduring scathing criticism from housing subcommittee Chairman Senator Wayne Allard (R-CO) during a Senate Banking, Housing, and Urban Affairs Committee confirmation hearing, Jackson decided to withdraw the Real Estate Settlement and Procedures Act (RESPA) Final Rule (RIN 2502-AH85) from OMB review.

During the February 26 hearing, Senator Allard surprised the audience with a forceful attack on HUD's handling of the RESPA reform process. After successfully engaging Jackson in a line of questioning designed to demonstrate just how unresponsive HUD had been to Congressional—as well as industry—criticism of the proposed RESPA rule, Allard launched into a cutting critique of the "arrogance" of what he called a "troubled agency." By pressing forward with the RESPA rule, HUD was, according to Allard, "thumbing its nose at" and "demeaning the Congress" while "belittl[ing] the Constitutional process." Allard asserted that HUD "must have leadership that clearly understands the Constitutional framework in which it is charged with implementing the laws written by Congress, not in implementing its own version." Because of his concerns over the way in which HUD had handled the RESPA rulemaking process, Allard declared that he would "be unable to support this nomination at this time." (It was later revealed that Allard had indeed placed a hold on Jackson's confirmation.)

After Allard concluded his comments, Committee Chairman Richard Shelby (R-AL) said, "I think Mr. Jackson got the message." Chairman Shelby was apparently correct, because in his March 22 letter to OMB Jackson attributes his decision to withdraw the RESPA rule to "a number of members of Congress…who voiced concerns about not receiving the benefit of a full briefing on the RESPA rule." Jackson's decision was made three weeks in advance of OMB's previously announced deadline for deciding whether to accept, reject, or send the rule back to HUD for further deliberation. Jackson has vigorously denied his decision was designed to get back in the good graces of Allard and clear a path toward his confirmation. However, soon after Jackson announced his decision, a spokesman for Allard revealed the Senator withdrew his hold on Jackson's confirmation.

Industry groups and members of Congress applauded Jackson's move. The American Bankers Association, the National Association of Realtors, the National Association of Mortgage Bankers, and other trade groups quickly released statement's praising Jackson's change of heart on RESPA reform. Chairman Shelby applauded HUD's action. "The strong opposition by consumer groups and industry made it clear that (the) rule required greater review and opportunity for the public to weigh in on the rule," he said. Interestingly, a watchdog group known as the Congressional Accountability Project recently accused Shelby of a "noteworthy conflict of interest" on the issue, since the Senator's most recent financial disclosure statement revealed that he chairs a title insurance company that brings him more than $100,000 in annual income. According to Stanley Friedlander, immediate past president of the American Land Title Association, only large title companies were guaranteed to survive had the rule gone into effect.

In it original July 2002 incarnation, the RESPA rule would have required lenders to offer a single price for the various costs (appraisals, title insurance, etc.) of processing a mortgage or to adhere more closely to the good faith estimate of those costs. HUD has promoted the effort by announcing that the new rule would save homebuyers an estimated $700 each on their loans, or $8 billion a year. The contents of the revised rule were never made public because HUD chose to submit the rule to OMB for final review rather than reopen the public comment period. Jackson has pledged to push forward with RESPA reform after additional consultation with members of Congress, consumer groups, industry groups, and the public. However, representatives from a number of industry groups have expressed confidence that RESPA reform may be dead. Stay tuned.

LOCAL GROUPS MEET WITH OMB TO DISCUSS CDBG PART REVIEW

On Friday, March 19, at the request of OMB Program Examiner Dustin Brown, NCDA staff along with representatives from NACo, NACCED, USCM, NAHRO, and COSCDA convened a meeting to receive an overview of the Performance Assessment Rating Tool (PART) that OMB uses to rate the performance of federal programs in its efforts to comply with the Government Performance Review Act (GPRA). Dustin requested the meeting to provide us with an explanation of why the CDBG program scored so low– 28 out of a total 100– as well as to enlighten us on the reasoning and rationale behind OMB's approach to program evaluation. Chandra Western and Jeff Falcusan represented NCDA at this meeting.

Before the meeting, as is the custom here in Washington, discussions were held between and amongst various attendees on the reasons for the meeting, the prospects of the meeting for convincing OMB to revisit the rating, the potential to learn something new about the PART, and, of course, whether the meeting was even worth convening. We were surprised that Dustin or anyone at OMB would want to meet with us, given the high probability that they would be greeted acrimoniously by groups that advocate tirelessly on behalf of the CDBG program. To his credit, Dustin was willing to face us, and we decided there was a chance we could gain a new perspective on OMB's current operating philosophy. And gain a new perspective we did.

OMB's overall assessment of CDBG is that the program's mission is not clear and is contradictory. Dustin explained that the statutory language speaks to "creating viable communities" on the one hand and to addressing the needs of "low- and moderate-income persons" on the other. This is somehow confusing to them, regardless of Congressional intent. They believe that the program goals need to be more focused so that indicators of impact on individuals can be adequately measured. This would allow for a more thorough assessment of the program's effectiveness. OMB made a determination that the CDBG program was ineffective because the data that was available was not in a format that would provide a way to measure its effectiveness, i.e. how CDBG dollars impacted the lives of its beneficiaries.

Evidence that grantees were performing as the statute and regulations dictated seems not to matter at all to Dustin or his superiors. Dustin was similarly unimpressed with our assertion that while the PART seems well-designed for categorical programs, it is ill-equipped to evaluate a block grant program with a broad focus and local flexibility. We tried to explain that CDBG is a program designed to allow jurisdictions to assist households and individuals to create viable communities through a variety of locally determined, eligible activities.. There is nothing in the statute or the regulations that dictates to local governments how this is to be done. Dustin's response literally caused the jaw of at least one public interest group representative to fall to the floor: "We are the Executive Branch. We have our own standards." Dustin made it quite clear that OMB evaluates programs according to their own vision of how programs should operate, not according to the current statutory or regulatory structure of such programs. In the collective mind of OMB, Congressional intent is an afterthought.

Dustin continued his comments by telling us that the score the CDBG program received was based on the data generated by HUD using IDIS. These data sets were seen as inadequate. The data, essentially output data, is apparently not sufficient to satisfy OMB's desire to demonstrate the program's impact on individuals. The data is not broken down in the way that OMB would like it for their review. For example, for housing data, the data received is based on housing units and households, not individuals. OMB could not assess the impact of CDBG housing activities on individuals. HUD does not ask grantees for data on individuals, therefore it is not available, so OMB cannot assess impact of housing activities on individuals. OMB's approach to evaluating the CDBG program guarantees the program will receive a poor rating. The data that would prove effectiveness from OMB's perspective is simply not available. OMB equates the inability to prove effectiveness with being ineffective.

HUD provided OMB with volumes of data on low-mod benefit, number of jobs created or retained, the types of public services activities assisted, water and sewer expended into lower income neighborhoods, parks, sidewalks, etc. This data demonstrates what CDBG is doing, not what it ***should*** be doing. OMB feels that regardless of Congressional intent, statutory language, or current regulations, CDBG dollars should be spent by concentrating funds in a way that revitalizes neighborhoods to make persons' lives better. OMB does not want to take away the flexibility of the program, it just believes funds need to be less spread out throughout the entire city. Local governments should develop plans to systematically revitalize lower income neighborhoods by concentrating funds to a point where "everything is done." Funds could then be used in the same manner to address the next troubled neighborhood.

For example, OMB seems to feel that CDBG funds are too spread out across cities and are not concentrated enough to show the program's impact. An example of child care was used. Dustin wanted to know how child care for lower income parents impacted peoples lives, because the current reporting systems for the CDBG program do not address this, nor are they required to. Our response was that grantees do not need to show this, because countless studies have documented the benefits of child care, outside of the fact that it allows both parents to work outside of the home. Why should grantees discuss the obvious? Nevertheless, Dustin pressed us on this issue, several times asking, "What is the benefit of having child care? Prove it!"

At this point, it was painfully obvious that we were at an impasse and that nothing we could say would in any way alter OMB's perception of the program's effectiveness. The data on CDBG is not gathered in the way that OMB would like. OMB is convinced that the program's mission is not clear and that its statutory language is contradictory in a way that does not allow for the program's performance to be measured in a meaningful way. As far as not having adequate performance measurement data, Dustin was not sympathetic. He argued that it's been ten years since GPRA and this should have been enough time for HUD to get its house in order on that issue.

It was suggested that OMB could re-evaluate the CDBG program or perhaps issue a statement admitting that a proper evaluation could not be done on CDBG's effectiveness because of the manner in which accomplishment data is forwarded to HUD. We explained that the ineffective rating could have an impact on the 2005 appropriations process. From our perspective, this request did not seem likely to succeed. Even if the program was re-evaluated, what would the outcome be? There would be no more information than already exists for OMB to determine the program effectiveness, because accomplishment data on CDBG is not collected in the format OMB requires.

Still, HUD is pursuing the "performance measure ideal" for the CDBG program, whatever that is. NCDA and the rest of our sister associations have agreed to work together to design a performance measure reporting system that makes sense and collects the same data for entitlements, urban counties, and the state small cities program, that will maintain the program's flexibility, get better output data and not require grantees to do any more work that they already do. This may mean a change in the way we currently report accomplishments, but it we will not support additional burdens on the grantees. Also, NCDA has strongly stated to HUD that any new reporting requirements must be accompanied by the creation of a suitable "place" for new data to go, meaning that if IDIS is not capable of collecting performance measure accomplishment data we will not support grantees submitting that data to HUD.

REPRESENTATIVE CLAY ATTACKS CDBG AS SUBCOMMITTEE HOLDS HEARING ON HOUSING COUNSELING

Representative William Lacy Clay (D-MO) drew the ire of public interest groups when he launched into a bewildering diatribe against the CDBG program during a Housing and Community Opportunity Subcommittee hearing on proposed housing counseling legislation. Clay's comments interrupted an otherwise perfunctory hearing on a piece of legislation with little chance of passage in the waning months of the 108^{th} Congress.

The hearing was more or less the result of a bargain struck between Subcommittee Chairman Bob Ney (R-OH) and members Nydia Velazquez (D-NY) and Barbara Lee (D-CA) during earlier hearings on the American Dream Downpayment Act. Velazquez and Lee had repeatedly pushed amendments that would have allowed jurisdictions receiving ADDI funding to use part of their allocation for housing counseling and for grants intended to help homeowners avoid foreclosure. They agreed to drop the amendments after Ney promised to hold hearings on these subjects at a later date. HR 3938 was introduced by Ney himself on March 11, with Velazquez and David Scott (D-GA) as cosponsors.

The bill itself is a patchwork of several related policy proposals that were cobbled together by the sponsors. HR 3938 would establish an Office of Housing Counseling to carry out HUD's responsibilities regarding homeownership and rental housing counseling, create a new toll-free telephone number to provide referral to entities providing counseling, and make grants to entities that provide counseling. FHA Commissioner John Weicher was on hand to represent HUD.

Weicher repeatedly asserted that the bill was almost certainly unnecessary and was unlikely to produce any real benefits for recipients of housing counseling. Weicher described HUD's current housing counseling program, operated as a set-aside under the HOME program, as the Department's only direct grant program with a broad counseling focus. Under the Bush Administration, funding for the program has doubled from $20 million to $40 million. (Through its budget submissions, the Administration has long sought to fund housing counseling as a separate program while maintaining the same organizational structure.) Although a small amount of funding for other counseling-related programs is available though Fair Housing Initiatives ($3.8 million) and the Resident Opportunity Self Sufficiency (ROSS) program ($13.2 million), those programs are already relatively small and narrowly targeted, meaning that absorbing them into a consolidated counseling office might not accomplish much. Indeed, Weicher argued that the transition to a new consolidated Office of Housing Counseling could lead to an interruption in service delivery.

The toll-free telephone number component of the legislation proved to be a source of uncertainty during the hearing. HR 39338 calls for the establishment of a "language-appropriate toll-free telephone number and a World Wide Web site through which persons interested in…counseling services may locate and obtain names and contact information of persons and organizations" that provide such services. There was confusion over what is meant by "language-appropriate" and exactly how many languages would have to be included in such a telephone service. Additionally, Representative Scott insisted that this telephone number would allow callers to talk to an actual human being as opposed to listening to a pre-recorded menu, although nothing in the bill appears to make that distinction. Weicher pointed out that HUD already operates an automated 800 number that generates contact information for local counseling providers. Scott argued that a new service is needed since "we need the elderly to be able to get a human being on the phone." Weicher countered that such a service, especially if it were to be made available in a number of languages and dialects, could potentially create huge new staffing needs.

Skepticism also greeted language in the bill calling for lenders to provide a booklet, designed by HUD, intended "to help consumers applying for federally related mortgage loans to understand the nature and costs of real estate settlement services." In addition to being printed in different languages, these booklets are to be "understandable and accessible to home-buyers of different ethnic and cultural backgrounds." Not surprisingly, no one on the subcommittee seemed especially interested in providing a detailed explanation of exactly what this would entail. Lenders would be expected to include a list of local housing counseling providers with the booklet as well as to select the booklet that is most language- and culturally appropriate for the person receiving it.

Representative Gary Miller (R-CA), displaying both his unique take on public service and a deeply felt respect for cultural diversity and religious tolerance, had an adverse reaction to the latter requirement: "Whenever I look at legislation, I look at how the private sector can be held liable in court," said Miller, a successful developer. He emphasized the need to clarify that these "ethnic and cultural background" requirements are not intended to impose a significant burden on mortgage brokers, and that they could lead to some sticky situations. "I know certain Muslims, for example, that are not allowed to shake my hand, because I'm a heathen!"

The hearing was following a more or less predictable trajectory until it was Represenative Clay's turn to question Weicher. Without much reason for doing so, Clay injected CDBG into the discussion by asking Weicher's opinion on whether jurisdictions receiving block grant funding should be required to set aside funds in order to provide housing counseling. What was the reasoning behind such a suggestion? Clay made the following statement: "Being from St. Louis, I know full well that CDBG funds are abused. I see it every day."

Commissioner Weicher, a Bush Administration political appointee, was immediately put in the unusual position of having to defend the CDBG program against a Democratic member of Congress who sits on the authorizing subcommittee. Weicher defended the thirty year history of CDBG, stating that administrations both Democratic and Republican have always acknowledged that the driving force behind the program is the belief that decisions should be left to local governments.

Clay interrupted, "You find local governments abusing funds every year." Weicher responded by repeating that "the program is intended to let local governments determine what they need to do with their funding." Weicher suggested that if Clay had evidence of program abuses, he should report such evidence to HUD's Inspector General. We are working to schedule a meeting with Clay's office to discuss the Congressman's accusations. In this era of growing federal deficits and misguided PART evaluations, the last thing we need is a member of the authorizing subcommittee making disparaging and unsubstantiated remarks about CDBG.

LOCAL GROUPS MEET WITH ASSISTANT SECRETARY BERNARDI

On Tuesday, March 23 the local public interest groups, colloquially known as "the PIGS" met with upper level CPD staff to discuss a variety of issues affecting practitioners who administer CPD's four formula programs. CPD General Deputy Secretary Nelson Bregón chaired the meeting on behalf of Mr. Bernardi, who cannot speak officially in any way until his nomination to the post of HUD Deputy Secretary is resolved. Mr. Bernardi did drop by to welcome the group and ensure us that his possible transition would not adversely affect his continued affinity of the programs in CPD. He said he is committed to seeing the work he began through to fruition. He thanked all of us for our support and assured us that we had his. The agenda, determined by the PIGS, for the quarterly meeting included discussion on the CDBG formula study, performance measures for the CPD programs, the ConPlan Improvement Initiative, IDIS re-engineering, Homeless Program Consolidation, and the 30th Anniversary of the CDBG program.

CDBG Formula Study

The CDBG formula study is completed except for the internal review. The study does not include any recommendations for statutory changes to the program, but outlines four scenarios for formula changes. We were told that the interest groups would be briefed on the study's contents before it is released to grantees. Also, the study will be sent to the Hill, although it is still not clear why this is being done since the Administration will not be making any specific recommendations, nor was the completion of a formula study directed by Congress. It appears that this study has been done, and that HUD will leave it to the Congress to determine if it will put forward changes to the CDBG formula.

Performance Measures

The Council of State Community Development Agencies (COSCDA) has undertaken a project to attempt to determine what kind of performance measures or indicators can be used by all the grantees of CDP's four formula programs. They hope to get all the groups on board in supporting this project as well as HUD so that when HUD is ready to begin collecting performance measurement data, all the grantees will be collecting the same data. NCDA will be participating in COSCDA's Performance Measures Summit being held in Washington on March 31.

The ConPlan Improvement Initiative

HUD has received reports from the most of the pilot groups. There are a couple still working on pieces such as the performance measures group. Apparently, a proposed rule has been sent to the Office of General Council for consideration for changes to the ConPlan rule which is part of the effort to streamline the plan and the process. It is anticipated that the rule will be released in proposed rule format with the requisite 2-3 month time period for receiving comments. If the rule becomes final, changes to the rule will most likely not take effect until FY 2006, because FY 2005 begins in October 2004. It is highly unlikely that HUD will propose any statutory changes to the Cranston Gonzalez Act, the legislation that created the ConPlan. Opening up this statute would most likely be problematic and volatile, even if the suggested changes make sense. Someone always comes along and proposes "other" changes that could severely alter the current landscape in which we all operate. HUD has committed to keeping the lines of communication open with the steering committee on the progress, or lack thereof, of the initiative.

IDIS Re-engineering

Nelson Bregón confirmed the departure of Robyne Doten as the head of the IDIS re-engineering project. She will be taking over for Bob Meehan, who is scheduled to retire this fall. Bob Breaver will now be heading up the IDIS reform process. As far as the refit of IDIS goes, the project is moving along, albeit more slowly than anticipated, due to the personnel change. We were told that the work will begin on making IDIS more web friendly and more "windows like" than we have seen before. As for the other improvements to the management system, HUD is embroiled in a lawsuit with EDS and Lockheed Martin over a dispute involving an IT contract involving all 80 field offices. We don't have any idea of how long it will take to settle this lawsuit and allow for the contractor to begin work. And as previously mentioned, none of the interest groups will support collecting and submitting data, different performance measures data, without the information systems needed to collect and disseminate that data.

30th Anniversary of the CDBG Program

Mr. Bernardi has signed the 30th anniversary proclamation for the 2004 National Community Development Week. Plans are still on the table to hold a national conference highlighting 30 years of the CDBG program. The tentative dates are the second week in September. The conference will be kind of a "best performance" conference highlighting outstanding examples of CDBG as work. Field offices will be asking grantees for very brief descriptions of outstanding projects, with photos, to go up on their website. It is hoped to have Presidential involvement, and advocates will be asking members to make Hill visits while in town. There will also be a 5 minute video that HUD will forward to all grantees and field offices on what 30 years of CDBG has meant to various people and groups. ***Note: NCDA will not hold its annual Executive Symposium this year to encourage members to attend HUD's 30th Anniversary Celebration of the CDBG program.***

NCDA NOTES

NCDA 2004 ANNUAL CONFERENCE
PORTLAND, OREGON
THE DOUBLETREE HOTEL AT THE LLOYD CENTER

May 19-22, 2004

The 2004 NCDA Annual Conference will be held in Portland, Oregon at the DoubleTree Hotel at the Lloyd Center on May 19-22, 2004. ***A CDBG Basics: Training for Practitioners*** course will be held immediately preceding the Annual Conference at the DoubleTree on May 17-19, 2004. Please check the NCDA Website for conference and training information next week.

NATIONAL COMMUNITY DEVELOPMENT WEEK

30th ANNIVERSARY OF CDBG

April 12-18, 2004

Please get your orders in as soon as possible or your merchandise for your 30th anniversary events will not make it on time. Members can print the CD Week Products flyer from the website. However, if you require items received via express mail, you will incur additional charges.

FEDERAL REGISTER NOTICES

Federal Register: March 22, 2004 (Volume 69, Number 55). America's Affordable Communities Initiative, HUD's Initiative on Removal of Regulatory Barriers

Announcement of Incentive Criteria on Barrier Removal in HUD's FY 2004 Competitive Funding Allocations

SUMMARY: Through this notice HUD announces its intention to proceed to establish in the majority of its Fiscal Year (FY) 2004 notices of funding availability (NOFAs), including HUD's SuperNOFA, a policy priority for increasing the supply of affordable housing through the removal of regulatory barriers to affordable housing as proposed in a notice published on November 25, 2003. In proceeding to implement this proposal, HUD took into consideration the public comments received on the November 25, 2003, notice and changes were made in response to public comment as more fully discussed in this notice.

ATTACHMENTS

Please go to NCDAonline (http://ncdaonline.org) to access the files below.

- ***Interest Group PART Response Letter to the President***
- ***Testimony of Mayor Garner***

FY 2004 HUD BUDGET

Program	FY 2003 Enacted	FY 2004 Enacted	FY 2005 President's Request
Community Dev Fund (CDBG)	$4.9049 billion	$4.934 billion	$4.618 billion
*Section 108 Credit Limit	$273.2 million	*$275 million	$0
Section 108 Operating	{$6.283 million}	{$7.325 million}	$0
Insular Areas	0	0	$7 million
Set-asides:			$72 million
Indian Block Grant	$70.5385 million	$72 million	$3 million
Housing Asst. Council	$3.2785 million	$3.3 million	$2 million
Nat. Am. Indian Council	$2.3844 million	$2.5 million	$3 million
Tribal Colleges/Univ.	$0	$0	$0
Wellstone Comm. Center	$8.9485 million	$0	$30 million
Capacity Building-NCDI	$32.287 million	$34.750 million	$35 million
Section 107	$48.780 million	$52 million	$2 million
Technical Assistance	$0	[$1.5 million]	$0
EDI Spec. Purpose Grts.	$259.303 million	$290 million	$0
Youthbuild	$59.610 million	$65 million	$65 million
Neighborhood Init. .	$41.826 million	$21 million	$0
Self Help Housing	$25.233 million	$27 million	$65 million
Habit for Humanity	[$4.222 million]	$4.750 million	[$5 million]
National Hous. Dev.	$4.967 million	$5	$0
National La Raza.	$4.967 million	$5	$0
Hawaiian Block Grant	$0	[$9.5 million]	$0
Working Capital Fund	$3.3379 million	$4.9 million	$1 million
Dev. Challenge Pilot	$0	$0	$10 million
Faith Based Pilot	$0	$0	$5 million
Total Set-asides	$565.371 million	$593 million	$299 million
Net Formula Allocation	**$4.339 billion**	**$4.331 billion**	**$4.319 billion**

Program	FY 2003 Enacted	FY 2004 Enacted	FY 2005 President's Request
HOME	$1.9124 billion	$2.0171 billion	$2.084 billion
Set-asides:			
Downpayment Assist.	$74.512 million	$87.5 million^	$200 million
Housing Counseling	$39.740 million	$40 million	[$0 million]
Information Systems	$1.0928 million	$2.1 million	$2 million
TA/TA Partnerships	$11.922 million	$18 million	$18 million
Lead Hazard Demo.	$0	$0	$0 million
Working Capital	--	--	$200,000
Total Set-asides	$127.267 million	$60.100 million	$ 218.2 million
Net Formula Allocation	**$1.7851 billion**	**$1.870 billion**	**$1.864 billion**
Downpayment Assistance	$74.512 million#	$87.5 million	$200 million
Homeless grants	$1.217 billion	$1.267 billion	$1.257 billion
Set-asides	$ 219.6 million	$ 208.580 million	$ 228 million
Total Homeless Grants	**$997.374 million**	**$1.06 billion**	**$1.485 million**
Housing Certificate Fund	$17.111 billion	$19.371481 billion	$16.909 billion
Housing Counseling Assist.	[$40 million]	[$40 million]	$45 million
Brownfields	$24.837 million	$25 million	$0
HOPWA	$290.102 million	$296.5 million	$295 million
Rural Housing and Economic Dev.	$24.837 million	$25 million	$0
Public Housing Capital Fund	$2.7122 billion	$2.641 billion	$2.674 billion
Public Housing Operating Fund	$3.577 billion	$3.6 billion	$3.573 billion
HOPE VI	$570.269 million	$150 million	$0
Section 202 Elderly	$777.910 million	$783.286 million	$773 million
Section 811 Disabled	$248.375 million	$250.515 million	$249 million

Program	FY 2003 Enacted	FY 2004 Enacted	FY 2005 President's Request
Lead Hazard Control	$174.856 million	$175 million	$139 million
EZ/EC	$29.805 million	$15 million	$0 million

[ ] included in Section 107 TA account

{}Part of the CDBG Formula, not a set-aside

* Not classified as a set-aside, Section 108 Loan Authority

^Funded from HOME, but as a separate program

#Set-aside within HOME

PLEASE NOTE: The chart does not include the 0.59% across-the-board cut approved by the House