December 9th, 2019

Colette Pollard, Reports Management Officer, QDAM
Department of Housing and Urban Development
451 7th Street SW, Room 4176, Washington, DC 20410-5000

To Whom It May Concern,

The National Association for County Community and Economic Development (NACCED) applauds the Department of Housing and Urban Development (HUD) on drafting the Opportunity Zone Grant Certification Form to collect data on Qualified Opportunity Zone Funds (QOZF) as they apply for and receive preference points towards federal grants and technical assistance for HUD programs. NACCED has previously encouraged HUD, the Department of Treasury (Treasury) and the White House Opportunity and Revitalization Council (The Council) to consider reporting requirements and data collection on all QOZFs and is excited to see HUD beginning to address this issue. NACCED continues to encourage HUD, Treasury, and the Council to make data collection and reporting a requirement of all QOZFs because NACCED believes these transparency measures will identify the extent to which the objectives of the Opportunity Zones initiative to benefit low-income persons and communities are being met.

The National Association for County Community and Economic Development (NACCED) is a technical and educational resource for county government professionals administering federally-funded affordable housing, community development, and economic development programs. NACCED also serves as an advocate in Washington on community development, economic development, and affordable housing policy impacting its members, particularly the CDBG and HOME programs. Opportunities Zones will affect all of NACCED’s members and many of the HUD programs that the QOZF preference points will go towards. Therefore, we respectfully recommend that HUD make the data collected via the Opportunity Zone Grant Certification Forms available to local and state governments so that they can best address the needs of the local residents as well as address the influx of new QOZF into their communities.

NACCED is grateful for this opportunity to express support for and provide recommendations on HUD’s Opportunity Zone Grant Certification Form. We are committed to working with HUD to ensure that Opportunity Zones are successful in supporting healthy revitalization of distressed communities without displacing existing residents. If you have any questions regarding these comments, please do not hesitate reaching out to me at ldemaria@nacced.org.

Sincerely,

[Signature]

Laura DeMaria
Executive Director
National Association for County Community and Economic Development

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