Memo To Members & Partners
A weekly newsletter from the National Low Income Housing Coalition

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Memo to Members & Partners will be on hiatus starting August 24, 2026. Weekly issues of Memo to Members will resume in September 2026.

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Message from the President and CEO

"Our Homes, Our Votes, Our Future"

By Renee M. Willis, NLIHC President and CEO

As we approach another consequential election season, I keep coming back to a fundamental truth: our fight for housing justice is inseparable from our fight for a healthy democracy.

Earlier this month, on August 3, NLIHC stood alongside the Repairers of the Breach and other partners for Moral Monday. We showed up because the struggle for affordable homes does not exist apart from the larger struggle for dignity, opportunity, and a government that is responsive to the people it serves. And we showed up because housing advocates have a role to play in protecting and strengthening our democracy.

For millions of people with the lowest incomes, the decisions made through our democracy are deeply personal. They determine whether a family can afford rent and still buy groceries. Whether someone experiencing homelessness has a path to a permanent home. Whether a senior can remain in the community they have called home for decades. Whether a child grows up with the stability that comes from knowing where they will sleep each night. These are policy choices. And elections help determine who gets to make them. At NLIHC, we see the consequences of those choices every day.

Our latest *Out of Reach* report once again makes clear just how far wages and rents have grown apart for millions of workers. Across the country, people working full time in essential jobs are still unable to afford a modest home at fair market rent. And for renters with the lowest incomes, the shortage of affordable and available homes remains staggering. Those numbers tell us something important. The housing crisis we face is not inevitable. It reflects decisions about what we prioritize, what we fund, whose experiences shape public policy, and whose voices are heard. That is why voting matters.

But democracy requires more than showing up on Election Day. It requires people to understand the power they hold and to use that power—to organize, advocate, tell their stories, hold elected officials accountable, and vote. That is the idea behind NLIHC's *Our Homes, Our Votes* campaign.

Through the campaign, we work with housing organizations, tenant leaders, advocates, and partners across the country to strengthen nonpartisan voter and candidate engagement among low-income renters. People most directly affected by our nation's housing crisis should have a powerful voice in determining its solutions. Too often, however, people with the lowest incomes face the greatest barriers to participating in our democracy.

Housing instability itself can make participation more difficult. When someone is worried about an eviction, moving from place to place, working multiple jobs, or trying to keep a family housed, civic participation can understandably fall further down the list of immediate concerns. That makes our work even more important.

Our role as a housing movement cannot end with helping people understand housing policy. We must also help build the power necessary to change it. That is why moments like Moral Monday matter. Our participation on August 3 was about recognizing that we are part of something larger than any single organization or issue. Affordable housing is connected to wages. It is connected to health. It is connected to racial and economic justice. It is connected to whether people can remain in their communities. And it is connected to whether people believe they have a meaningful voice in the decisions that shape their lives.

When housing advocates show up for democracy, we strengthen the movement for housing justice. And when renters with low incomes vote, organize, and make their voices heard, our democracy becomes more representative of the people it is supposed to serve.

Over the coming months, I hope every member and partner of NLIHC will consider what more we can do—not in a partisan way, but in a purposeful one—to help people participate. That might mean registering eligible voters. It might mean helping residents understand when and where they can vote. It might mean hosting nonpartisan candidate forums, talking with candidates about housing, sharing voter information, or making sure the people we serve know that their experiences and their voices matter. And, importantly, it means continuing to organize after the ballots are counted.

Because our goal is bigger than any single election. We are working toward a country where everyone has a safe, accessible, and affordable home—and where the people most affected by housing policy have real power in shaping it.

Budget and Appropriations

Use NLIHC's August Recess Toolkit to Advocate for Affordable Housing and Homelessness Investments Communities Rely On

By Kim Johnson, NLIHC Senior Director of Policy

Keywords: Budget and Appropriations, THUD, HUD, FY27

Both the House and Senate are in recess for the next two weeks, with the House scheduled to return to D.C. on August 31 and the Senate returning on September 14. During August Recess, federal lawmakers spend time in their home states and districts to hear from constituents about the issues impacting them, making August Recess a great time to advocate for federal investments in affordable housing and homelessness resources!

NLIHC's 2026 August Recess Advocacy Toolkit includes information, tips, and resources to help advocates engage their federal elected officials during August Recess and push for increased funding and safeguards for the programs people rely on to afford the cost of rent and that communities rely on to build, maintain, and operate safe, affordable, accessible homes, including:

- How to schedule an in-district meeting with a member of Congress or invite an elected official to tour a housing development in your community.

- NLIHC's policy priorities for the remainder of the current Congress.
- Links to resources for more information and to help understand what the affordable housing crisis looks like in your community.

Activities like scheduling in-district meetings with members of Congress or inviting an elected official to tour a housing development in your community help build relationships, educate members of Congress and their staff about the housing needs in your community, and show first-hand the positive impact of federal affordable housing and homelessness investments.

Use NLIHC's August Recess Toolkit to Tell Congress to Expand – Not Cut – Federal Investments in Affordable Housing and Homelessness Assistance Programs!

At a time when a record number of renters are housing cost-burdened and families around the country are struggling to afford necessities like housing, food, and medical care, Congress should be working to expand—not cut—funding for programs that help people make ends meet.

Advocates can take action today by:

- Using NLIHC's updated August Recess Advocacy Toolkit to learn how to schedule an in-district meeting, plan a site visit, and engage with your members of Congress while they're in their home states and districts for August Recess!
- Emailing or calling members' offices to tell them about the importance of affordable housing, homelessness, and community development resources to you, your family, your community, or your work. You can use NLIHC's Take Action page to look up your member offices or call/send an email directly!
- Sharing stories of those directly impacted by homelessness and housing instability. Storytelling adds emotional weight to your message and can help lawmakers see how their policy decisions impact actual people. Learn about how to tell compelling stories with this resource.
- Organizations can also join the Campaign for Housing and Community Development Funding (CHCDF)'s sign on letter calling for the highest possible funding for HUD and USDA affordable housing, homelessness, and community development programs in any final fiscal year (FY) 27 spending bills. Read the letter and sign your organization on here.

Visit NLIHC's Advocacy Hub for more information and resources that can help you take action and help protect the affordable housing programs people rely on.

HUD

2026 National Housing Trust Fund State Allocations Now Available After Delay from OMB

By Kim Johnson, NLIHC Senior Policy Director and Libby O'Neill, NLIHC Senior Policy Analyst

Keywords: HUD, National Housing Trust Fund

The 2026 National Housing Trust Fund (HTF) allocations for each state, the District of Columbia, Puerto Rico, and the U.S. territories are now available. A total of $255 million in HTF funds is available for 2026, a slight increase from the 2025 HTF total of $223 million.

HUD's Office of Community Planning and Development updated its program allocation spreadsheet on August 3 to include amounts for the HTF. The previously published program allocation omitted the HTF without any explanation. Senator Jack Reed (D-RI), who led the legislative efforts to create the HTF in 2008, led a campaign demanding that the Office of Management and Budget (OMB) release the funds, including a letter in June signed by Senator Reed and 22 other Senators. Senator Reed celebrated the apportionment of funds in a press release.

When it was established in 2008, the HTF was the first new housing resource since 1974 targeted to building, preserving, rehabilitating, and operating rental housing for extremely low-income people. Starting in 2000, NLIHC, its members, and other stakeholders played a critical role in the creation of the fund and continue to advocate for increases to annual HTF funding. The first HTF grants were allocated to states in 2016.

Read Senator Reed's Press Release here.

Read NLIHC's *Advocates' Guide* on the HTF here.

Read NLIHC's reports and resources on the HTF here.

The 2026 HTF allocations, along with CDBG, HOME, ESG, and HOPWA allocations are at https://www.hud.gov/hud-partners/community-budget-26.

HUD PIH Rescinds Payment Standard Flexibilities for Emergency Housing Voucher and Stability Voucher Programs

By Alayna Calabro, NLIHC Senior Policy Analyst

Keywords: HUD, PIH, guidance, notice, HCV, vouchers, rental assistance, EHV, emergency housing vouchers, stability vouchers, waiver

HUD's Office of Public and Indian Housing (PIH) issued Notice PIH 2026-20, "Revision to Emergency Housing Voucher and Stability Voucher Program Requirements Related to Payment Standards," on August 10. The notice removes language from Notice PIH 2021-15 and Notice PIH 2022-24 that allowed public housing agencies (PHAs) to establish a payment standard of up to 120% of the Fair Market Rent (FMR)—rather than 110%—without HUD approval for the Emergency Housing Voucher (EHV) and Stability Voucher (SV) programs.

HUD used authority granted through the “American Rescue Plan Act” and the “Consolidated Appropriations Act of 2022” to issue a discretionary waiver and alternative requirement that allowed PHAS to establish an EHV/SV payment standard between 90-120% of the published FMR without seeking HUD approval.

The Notice states that PHAs must follow the regulations at 24 CFR 982.503(c) regarding the payment standard basic range of 90-110% FMR and 24 CFR 982.503(d) for any exception payment standard amounts above 110% FMR.

Within 60 days of the notice issue date, PHAs must be in compliance with payment standard requirements for new SV admissions and current EHV and SV families moving to a new unit. Exception payment standards that PHAs have adopted for their HCV program pursuant to existing regulations are not impacted by the waiver rescission.

Read the PIH notice.

Congress

NLIHC Applauds Reintroduction of “VITAL Act” to Improve Accessibility in LIHTC Properties

By NLIHC Policy Team

Keywords: VITAL Act, LIHTC

Senators Amy Klobuchar (D-MN) and Kristen Gillibrand (D-NY), and Representatives Dwight Evans (D-PA) and Brian Fitzpatrick (R-PA) reintroduced the bicameral, bipartisan “Visitable Inclusive Tax Credits for Accessible Living (VITAL) Act” (S.5285/H.R.10049), which would make reforms to the Low Income Housing Tax Credit (LIHTC) to support more accessible housing for people with disabilities. NLIHC is proud to endorse the VITAL Act and applauds these lawmakers for their leadership.

The “VITAL Act” makes several reforms to the LIHTC program:

- Increases the amount of credits a project can receive if the project is in a walkable neighborhood and incorporates certain accessible design standards.
- Requires that at least 40% of states’ LIHTC units are disability adaptable and accessible (or at least 20% if they are in walkable/rollable neighborhoods).
- Increases the LIHTC annual state allocation.

More accessible, affordable housing is greatly needed across the nation. Less than six percent of the nation’s housing stock is accessible for people with mobility-related disabilities, and less than one percent is accessible to wheelchair users. In addition, people with disabilities are twice as likely to live in poverty compared to people without a disability; in 2021, the Century Foundation found that nearly 40% of renters with a disability struggled to pay rent. The VITAL

Act addresses both accessibility and affordability by reforming the LIHTC program, the largest federal subsidy for developing and preserving affordable rental housing.

NLIHC supports the VITAL Act, as well as other reforms to LIHTC, including incentivizing deeper income targeting, strengthening tenant protections, and ensuring long-term affordability. Read more about LIHTC reforms here.

Take Action!

Tell your Senators and Representative to co-sponsor the VITAL Act using The Kelsey's letter.

Read the bill text here.

Read more from The Kelsey about reforms to strengthen accessible, inclusive, and affordable housing.

Public Charge

Senator Hirono (D-HI) and Representative Chu (D-CA) Introduce “Protect American Values Act” to Stop Public Charge Rule Implementation

By Sarita Kelkar, NLIHC Policy Intern

Keywords: public charge, benefits, federal funds, green card, PIF, chilling effect, immigrant families

On August 6, Senator Mazie Hirono (D-HI) and Representative Judy Chu (D-CA) introduced the “Protect American Values Act” (S.5331 and H.R.10045, respectively) to stop the final “public charge” rule issued by the Trump administration (see *Memo*, 7/27). Introduced previously in the 116th Congress by Sen. Hirono, the bill notes differences between the two Trump-era rules. Rep. Chu notes, “unlike the previous rule, this finalized policy does not even identify which benefits will be considered in a public charge test, giving Trump’s immigration officers sweeping discretion to deny green card applications based on subjective judgment instead of clear legal standards.”

The “Protect American Values Act” would bar federal funds from being used to carry out the finalized public charge rule across administration and enforcement processes. NLIHC, along with over 100 organizations, endorsed the bill—an integral piece of advocacy against the final rule scheduled to take effect September 18, 2026. NLIHC’s digital toolkit offers insight into the rule’s background and expected harms, including resources from the Protecting Immigrant Families (PIF) Coalition.

Background on Public Charge

The “public charge” inadmissibility test was created over 140 years ago to identify people who may depend on the government for financial assistance. Immigration officials apply the public charge test in evaluating someone’s application for lawful permanent resident status (also called a “green card”) or admission into the United States. Notably, the public charge rule does not apply to many immigrants, including refugees, asylees, survivors of domestic violence and human trafficking, people with special immigrant juvenile visas, and more.

The new public charge rule, which goes into effect September 18, rescinds the 2022 public charge rule and removes all clarity around which public benefits may be considered in the public charge inadmissibility test. The 2022 rule clearly stated that usage of several health and social services would NOT be considered in a public charge determination—this includes Medicaid, the Supplemental Nutrition Assistance Program (SNAP), and housing assistance programs such as public housing, Housing Choice Vouchers, and Project-Based Rental Assistance (PBRA).

The Final Public Charge Rule

In 2019, the first Trump administration attempted to include these benefits in the public charge test through a proposed public charge rule, receiving remarkable pushback from advocates outlining its harms before its ultimate reversal (see *Memo*, 8/19/19). However, the new final rule will cause significantly greater harm. The final public charge rule:

- Does not make clear which benefits programs or government services would be considered in a public charge test.
- Allows officials to consider a family member's use of benefits as evidence of an applicant's income and resources.
- Allows immigration officials to use their own discretion in considering other factors when deeming someone a "public charge."

What remains consistent from when Senator Hirono introduced the legislation in 2019 to its reintroduction now is outrage over how the rule would create and perpetuate a "chilling effect" for immigrant families. Millions of lawfully present immigrants and U.S. citizens will avoid seeking nutrition, healthcare, housing, and other resources for which they qualify under federal law. When one in four children in the U.S. is in an immigrant family and most (90%) children in immigrant families are U.S. citizens, many will go without crucial supports because of fear and confusion caused by policies such as the public charge rule.

Read the House and Senate bill texts.

Read the press release for the "Protect American Values Act" here. Access NLIHC's and PIF's toolkits on public charge.

Read the final public charge rule here.

Learn more about the history of public charge in Chapter 6 of NLIHC's 2026 *Advocates' Guide*.

Disaster Recovery Housing

Senate Confirms Cameron Hamilton as FEMA Administrator

By Amin Sobhani, NLIHC DHR Intern, Noah Patton, NLIHC Director of Disaster Recovery, and Meghan Mertyris, NLIHC Senior Disaster Housing Recovery Analyst

Keywords: FEMA, confirmation, disaster recovery

The U.S. Senate confirmed Cameron Hamilton as administrator of the Federal Emergency Management Agency (FEMA) on August 7 by a 51-47 vote. Administrator Hamilton was confirmed as part of an en bloc package of 74 nominees and was sworn in on August 10. He is the first Senate-confirmed FEMA administrator of President Trump's second term, taking charge as the agency manages a heavy wildfire and flood season, more than 1,000 open disasters, and ongoing workforce and operational changes.

Hamilton previously served as the senior official performing the duties of FEMA administrator from January until May 8, 2025. At a House appropriations subcommittee hearing the previous day, he said eliminating FEMA was not "in the best interest of the American people." President Trump nominated him to return as administrator in May 2026. NLIHC previously reported that FEMA employees respected Hamilton's willingness to reconsider his early views of the agency. His nomination also brought renewed attention to how his background aligned with the position's statutory experience requirements and to his earlier public comments about FEMA assistance. During his June 17 confirmation hearing before the Senate Homeland Security and Governmental Affairs Committee, senators asked Hamilton about consistency in disaster declaration approvals. Administrator Hamilton pledged to ensure FEMA is "objective, fair and reasonable, follows the law, and is consistent" when assessing requests for assistance. He also said FEMA should decide disaster declarations and reimbursements faster, simplify its processes, and rebuild staff capacity. Hamilton said he would not support a 2025 proposal to quadruple the damage threshold states would need to meet to access assistance and affirmed the importance of FEMA's disaster resilience programs.

Administrator Hamilton begins his tenure as FEMA's role and structure remain under active discussion. The agency's announcement of Hamilton's swearing-in emphasized the administration's goal of making FEMA a "lean, deployable disaster force." Along with emergency response, FEMA is responsible for preparedness, mitigation, grant administration, coordination, and long-term recovery. The agency's capacity to carry out each of these functions will remain an area of attention as organizational changes move forward. NLIHC reported in 2025 that FEMA had been experiencing workforce reductions and capacity constraints during Hamilton's earlier tenure.

NLIHC is focused on how FEMA's policies and programs affect households with the lowest incomes. Renters, low-income homeowners, and people experiencing homelessness can face serious barriers when applying for aid, documenting eligibility, securing temporary housing, or appealing a denial. Hamilton's stated commitment to fairness and consistency will be relevant to the agency's approach to accessible applications, clear notices, timely decisions, and transparent distribution of assistance. These measures can help recovery resources reach survivors with the greatest needs without deepening housing instability.

With Senate-confirmed leadership in place, attention will now turn to FEMA's administration and broader policy direction. NLIHC and the NLIHC-led Disaster Housing Recovery Coalition will continue monitoring the agency and advocating for passage of the bipartisan FEMA Act, which would restore FEMA as an independent agency, streamline access to assistance, strengthen transparency and accountability, and invest in mitigation and resilience. These efforts reflect NLIHC's continued focus on a disaster recovery system that is faster, fairer, and responsive to all survivors.

Opportunity Starts at Home

Survey Opportunity from the Institute for Human-Animal Connection

By Julie Walker, NLIHC Project Manager, *Opportunity Starts at Home*

Keywords: multi-sector, humans, animals, access

The Institute for Human-Animal Connection, a center at the University of Denver that conducts scientifically rigorous research to improve the overall well-being of humans, animals, and the environment, is seeking survey responses from housing service providers, other social service providers, and animal welfare providers to understand what resources are currently being provided to tenants and client-reported barriers to accessing or maintaining rental housing with their pets. Survey results will be used to improve coordination between housing and animal welfare organizations.

The lack of access to affordable, pet-inclusive housing is consistently cited as one of the top reasons why tenants, especially low-income tenants, must separate from their pets. This survey's purpose is to understand the resources that organizations may be providing tenants with pets and/or the barriers that clients experience related to accessing or keeping rental housing with their pet. Information gained from the survey will inform both programmatic and advocacy goals. The survey is open to all organizations that support clients, regardless of whether they currently include programs supporting tenants with pets. Respondents whose organizations do not offer pet-related services can indicate this in the survey.

Examples of pet-related services for tenants include:

- Pet rent, fee, or deposit assistance
- Assistance accessing emotional support animal letters
- Pet food or vouchers for free veterinary care
- Housing navigation assistance to help a tenant with a pet locate housing
- Landlord conflict mediation related to a tenant's pet

See the flyer from the Institute for Human-Animal Connection.

Access the provider survey for pets and housing resources.

Our Homes, Our Votes

Recap: NLIHC's *Our Homes, Our Votes* National Webinar: "Voter Registration 2026: Tools, Rules, and Strategies for Low-Income Renters"

By Haadia Hyder, NLIHC Strategic Partnerships & Campaigns Intern

Keywords: OHOV, Louisiana v. Callais, Nonprofit VOTE, Register Her, Civic Holidays

On Tuesday, August 9, NLIHC's *Our Homes, Our Votes* (OHOV) nonpartisan campaign hosted its monthly webinar, with August's session, "Voter Registration 2026: Tools, Rules, and

Strategies for Low-Income Renters," focused on proactive measures to drive voter registration in a safe, effective, and non-partisan manner.

While previous webinars focused on the current election landscape post-*Louisiana v. Callais*, August's OHOV webinar gave participants tangible tools and skills to engage their communities in voter registration and participation. Panelists focused on resources available through Nonprofit VOTE's National Voter Registration Day and Register Her's V.O.I.C.E trainings.

Chantelle Wilkinson, NLIHC's vice president of strategic partnerships and campaigns, welcomed attendees and drew attention to why voter mobilization at this moment matters with 2026 Midterms drawing near. Wilkinson also noted that it is currently August recess in Congress, which means policymakers will be back in their home states and communities, making now a particularly good time to meet with them about your organization's policy priorities. You can find more information on August Recess and strategically engage with policymakers through NLIHC's August Recess toolkit. Wilkenson also highlights that September 16 is National Voter Registration Day, making it a particularly good date around which to plan voter registration programming.

Chyanne Sapp, campaign director at National Voter Registration Day, began by focusing on the urgency of running voter drives and engaging with voters in our trying times. She highlighted the stakes of the 2026 midterms with hundreds of elected seats up for grabs at a time where Americans are increasingly impacted by the state of policy and politics, making voter mobilization more pertinent than ever. Sapp's presentation centered on the logistics of planning a National Voter Registration Day event and went over the rules of being a National Voter Registration Day partner (you can sign up to be a National Voter Registration Day partner), highlighting the need for community members to take charge in registering their communities to vote and prioritizing key tenets: knowing your community, knowing your facts, and knowing your tools. You can find links to National Voter Registration Day fact sheets, voter registration guides, prior webinars, and more.

Rachel Jeck, Co-founder and Executive Director of Register Her, expanded upon the theme of engaging community members in voter registration by highlighting Register Her, an organization dedicated to bringing no-charge voter registration training to workplaces. Jeck began by highlighting the role of nonprofits in civic engagement and reviewing common fears around conversations about voting, providing new strategies and tools to empower employees to discuss and advocate for voting in the workplace while maintaining legal compliance.

The webinar concluded with Tia Turner, NLIHC Project Manager for *Our Homes, Our Votes*, noting how *Our Homes, Our Votes* in the upcoming months will focus on equipping partners with skills and knowledge in preparation for Get Out the Vote. Turner also mentioned that the next *Our Homes, Our Votes* webinar will focus on combating election misinformation, bringing in experts across the field. She also highlighted *Our Homes, Our Votes*' TurboVote tool, ready to be utilized by partner organizations. If your organization would like a custom link to our TurboVote tool, email ourhomes@nlihc.org. To join *Our Homes, Our Votes'* affiliate network, click here.

Across the webinar, panelists emphasized the necessity for tailored, community-specific outreach from individuals across the country, homing in on the idea that it is not just our civic duty to vote, but to encourage our friends, family members, neighbors, and coworkers to vote as well.

Presentation Slides

Find presentation slides.

The next *Our Homes, Our Votes* webinar, "Combating Misinformation: Equipping Housing Advocates as Trusted Messengers in 2026," will take place on Monday, September 14, at 3:00 pm ET.

Stay Connected with OHOV

Subscribe to the *Our Homes, Our Votes* Monthly Newsletter to receive the latest updates on voting rights, civic engagement resources, upcoming webinars, and opportunities to take action at the intersection of housing justice and democracy.

Follow *Our Homes, Our Votes* on Instagram.

The recording of the webinar can be found on NLIHC's YouTube channel.

Additional resources shared during the webinar:

- OHOV Resource Hub
- OHOV Webinar Series
- Check Your Voter Registration
- Tools from Register Her
- Tools from National Voter Registration Day
- NLIHC's August Recess toolkit

March on Washington 2026: Defend the Vote

On Friday, August 28, 2026, a broad coalition of civil rights, labor, faith, and civic organizations will gather at the Lincoln Memorial for the March on Washington 2026: Defend the Vote, marking the 63rd anniversary of the historic 1963 March on Washington. The nonpartisan mobilization will center on defending voting rights while also advancing economic dignity, equal opportunity, and affordability, including access to safe and affordable housing.

We encourage NLIHC partners and housing advocates to learn more, register to participate, and share the opportunity with their networks as we continue working together to strengthen civic participation and ensure that every community has a voice in our democracy.

Learn more and register for the March on Washington 2026.

HoUSed

Recap: August 11 National *HoUSed* Campaign Call

By Sarita Kelkar, NLIHC Policy Intern

Keywords: public charge, discrimination, guardrails, benefits, immigrant families, CRA, banks, financial needs, community development, requirements, affordable housing, wildfires, disaster recovery, homelessness, RDRA, DHRC

On August 11, NLIHC hosted a national *HoUSed* campaign call with panelists providing information on the final public charge rule, proposed changes to the "Community Reinvestment Act," and disaster recovery efforts in response to wildfires in Washington.

NLIHC Senior Vice President of Policy David Gonzalez Rice began by introducing the panelists and topics discussed in the call. First, Maddie Geschu, director of policy & advocacy at the Protecting Immigrant Families (PIF) Coalition, gave background on the meaning and history of "public charge"—sharing how it has often been used as a tool of discrimination while contextualizing how the public charge test has changed over time. With the final rule going into effect September 18, Geschu emphasized 1) the loss of guardrails established previously under the Biden rule that allow immigration officers personal discretion, 2) the expansive nature of the final rule in allowing the benefits an applicant's dependents use to be considered, and 3) the uncertainty and harm the final rule poses to immigrant families even when the test only applies to a limited group of immigrants.

Next, National Community Reinvestment Coalition Senior Policy Advisor Kevin Hill defined how the "Community Reinvestment Act" (CRA) requires banks to serve the financial needs of all communities, describing how recent proposed changes attempt to roll back community development requirements while weakening evaluation components. By first providing insight into how banks are currently evaluated, Hill shared how, dependent on bank size, half of banks have had community development requirements for over thirty years; in illustrating this precedent, Hill characterized how the proposal of raising the "small bank" threshold from $412 million to $1 billion would disproportionately harm rural and Southern states by voiding the compulsory development of affordable housing. Hill noted how this proposal not only removes requirements, but also threatens bank accountability, branches in low-to-moderate income areas that are majority people of color, and communities' financial health.

Disability integration advisors Duaa-Rahemaah Hunter and Todd Holloway—at the Washington Housing Alliance and Washington State Coalition on Inclusive Emergency Planning, respectively—switched discussion over to the field, covering the current wildfires in Washington. Hunter recounted disaster recovery responses the day the fires started in Spokane, stressing the need to find relief for people experiencing homelessness. Mentioning relevant concerns like income security, eviction, and health, Hunter spoke to the overwhelming reality of encountering devastation in real time while relaying the importance of organizing and mutual aid. Holloway's account underscored how legislation like the "Reforming Disaster Recovery

Act" (RDRA) and partnerships with groups like NLIHC's Disaster Housing Recovery Coalition (DHRC) can contribute to aiding disaster survivors in Spokane and beyond.

NLIHC Manager of Membership Engagement Lindsay Duvall closed the call by reiterating how critical it is to hear from people working on the ground. Duvall also shared ways to take action through digital advocacy links and joining NLIHC as a member. A recording of the call, as well as the presentation slides, are now available. Register here for NLIHC's next National HoUSed campaign call September 8 from 4:00 pm to 5:00 pm ET.

Public Charge

- Read more about public charge and how it impacts your communities using PIF's toolkit.
- Learn about the harms of the public charge rule changes in 2019 here.
- Explore the different types of benefits and what's considered in the new public charge rule here.
- Explore this community-facing resource that helps families determine if they might be subject to the new public charge rule.

Community Reinvestment Act

- Learn more about the CRA.

Washington Wildfires and Disaster Recovery

- Support Spokane wildfire relief and mutual aid here and here.
  - Reach out to the Emergency Operation Center (EOC) at 509-634-2043 from 8:00 am to 6:00 pm PT with any new items to aid in Colville Tribes' wildfire relief.
- Learn more about the Washington wildfires through this tracking map.
- Check out the WA Housing Alliance and WA Coalition on Inclusive Emergency Planning's incredible work.
- Learn more about the DHRC.
  - Read about the RDRA.
  - Learn how HUD's Community Development Block Grant – Disaster Recovery is funded and learn about what's changed with the CDBG-DR over time.
  - Contact your elected officials to advocate for disaster assistance funding!
- Learn how to advocate for eviction moratorium and mortgage forbearance in the wake of disasters.
- Text +1 (800) 626-4959, email hotline@disasterstrategies.org, or go to https://disasterstrategies.org/hotline/ to access the disability & disaster hotline.

Take Action

- Access NLIHC's August Recess Advocacy Toolkit.
- Learn more about NLIHC membership and become a NLIHC member.
- Support NLIHC policy priorities by taking action.

NLIHC's national *HoUSed* campaign calls take place on the second and last Tuesday of every month from 4:00 pm to 5:00 pm ET. Register for the next call on September 8 and the series, and access NLIHC's archive of *HoUSed* campaign recordings.

Research

State and Local Governments Explore Publicly Backed Insurance Programs to Lower Costs for Affordable Housing Providers

By Julian Mura-Kröger, NLIHC Research Intern

Keywords: insurance, FAIR Plans, New York City, captives

The rising costs of insuring affordable rental properties is a growing source of alarm for advocates, housing providers, policymakers, and researchers trying to tackle the nation's housing crisis. Between 2019 and 2024, the average monthly insurance cost per rental unit rose more than 75% nationally. A study from the University of Texas at Austin found that the average share of multifamily properties' operating costs spent on insurance nearly doubled from 2019 to 2024, jumping from 5.7% to almost 10%. These researchers also found that tenants often paid the price for these increased insurance costs: housing providers compensated for roughly one-third to one-half of these increased costs by raising rents.

These increases can be attributed to factors such as construction cost inflation, rising reinsurance prices, and speculative underwriting practices, all of which have implications for the profit-driven structure of the private insurance market. For insurance companies that are publicly traded or owned by private equity investors, growth is a structural requirement of their business. To maximize growth, companies must reduce costs by minimizing risk, acquiring new insurance policies to gain a larger share of the insurance market, or increasing per capita revenues by raising premiums and deductibles.

As climate change increases overall risk and makes some communities uninsurable, increasing premium prices is left as one of few viable options for continued growth. In many cases, private insurers are choosing to stop insuring communities with the highest disaster risks, leaving housing providers in those communities with few—and frequently expensive—options. Available options may be further limited by "insurance redlining," through which insurance providers refuse to cover properties with affordability restrictions due to faulty assumptions about low-income households' liability risk. For affordable housing providers already operating on low margins, this often results in decisions to neglect repairs and maintenance or to push for rent increases, as seen during New York City's recent Rent Guidelines Board hearings.

In New York City, insurance costs have risen dramatically, with premiums for affordable rental properties rising from $617 per unit in 2018 to $1,853 in 2025. To address this, the city recently unveiled plans for a publicly backed Affordable Housing Insurance Program (AHIP) reserved for affordable and rent-stabilized housing. With a $100 million investment, the program is seeking to provide premium reductions of 20% or more for 20,000 income-restricted and rent-stabilized units at its launch in 2027 before scaling to 100,000 units by 2030. Given that every $100 increase in insurance costs is associated with an additional $1,200 in city capital for new affordable housing transactions, reducing insurance costs will hopefully allow the city to stretch its housing capital further.

The AHIP proposal seeks to address insurance cost pressures while preventing rent hikes, building on lessons learned from other policies and programs for multifamily housing insurance seeking to slow or prevent rising costs across the country. Of these tools, insurers of last resort—often called Fair Access to Insurance Requirements (FAIR) plans or Beach/Wind programs—are some of the most prevalent, with thirty-five states having at least one program to support homeowners or rental housing providers. Insurers of last resort provide coverage in communities that the primary insurance market refuses to take on, usually due to risks perceived to be unprofitable; as a result, policies offered by FAIR programs tend to be significantly more expensive and have narrower coverage. Although initially permitted in the 1960s to address small, temporary gaps, climate change has made them increasingly more important as the private sector leaves more areas uninsured. Insurers of last resort still struggle with a wide array of structural issues, including the pooling of risky policies, extreme assessment pass-through agreements, and depopulation contracts that funnel lower risk policyholders back to the private sector. As a result, private insurers maintain their ability to hold only the most profitable, low-risk policies while dumping high liability communities into expensive coverage which will, in many cases, pass the costs of claims back to communities during the worst of disasters.

Some states are turning to other strategies to reduce insurance costs for affordable housing providers. For example, New York State recently issued a $2 million loan to the Milford Street Association, which provides captive insurance exclusively for members who have properties with regulated rents or subsidies from city, state, or federal housing financing agencies. The program insures more than 80,000 affordable housing units in New York. Policymakers in California are seeking to emulate this model through Senate Bill 1170, which would allow nonprofit housing developers to enter into agreements with public agencies for the purpose of establishing joint insurance programs. Initiatives developed because of this bill would be able to operate at lower margins, and in theory, with lower costs for affordable housing providers.

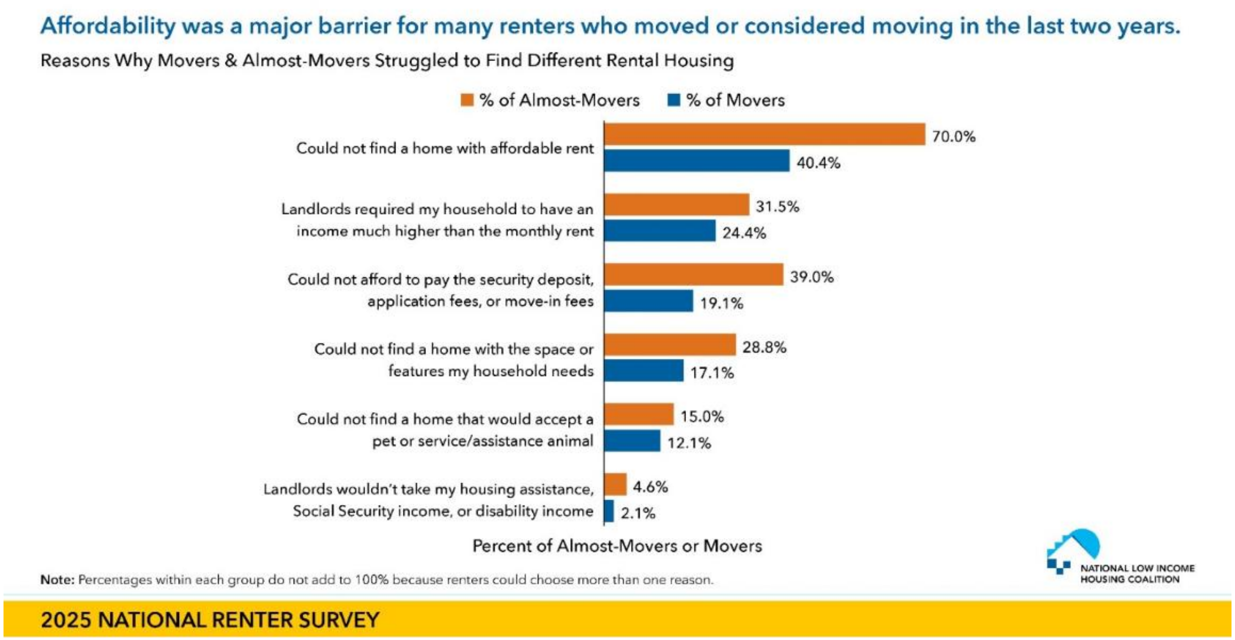
These examples highlight the importance of getting the details right for New York City's $100 million investment. The NYC Economic Development Corporation (EDC) recently released a request for expressions of interest for the AHIP that provides some insight into what the program might look like once launched in late 2027. The request makes it clear that the AHIP is not intended to serve as an insurer of last resort, allowing it to combine low- and high-risk properties under a single program and commit to stricter underwriting practices. Given that city funding will be a one-time investment only, this will be vital to ensure that the program can sustain itself on premiums and other revenues rather than assessments passed to policyholders and already strained general budget funding. The request also notes that while the NYC government does not anticipate owning the program, options for transparency will be essential, such as through board representation, covenants, a trust, or consent rights.

The NYC EDC may wish to consider additional components to the AHIP to ensure its long-term sustainability—for example, adding specific provisions on how savings can be passed onto residents to make up for shouldering portions of rising insurance costs, using surplus revenues for climate mitigation strategies, and making public the models used to determine rates and coverage. Should the EDC seek to expand the program to cover a larger portion of the more than one million rent-stabilized or income-restricted units in New York City, additional funding might be captured through specific fees, taxes, or surcharges on significant emitters of greenhouse gases, as recommended by the Climate & Community Institute in their report on FAIR plans. Ultimately, New York City's new insurance program and its predecessors illustrate the growing need for policymakers to take actions that address the root causes of rising insurance costs for affordable rental properties so that existing units remain affordable and inhabitable for the lowest-income renters for years to come.

Fact of the Week

Reasons Why Movers and Almost-Movers Struggled to Find Different Rental Housing

Keywords: National Renter Survey, moving, affordability



Source: NLIHC *2025 National Renter Survey* report, available at https://nlihc.org/national-renter-survey

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NLIHC Careers

NLIHC Seeks Interns for Fall Semester

NLIHC is accepting applications for internship positions for the fall 2026 semester. Interns are highly valued and fully integrated into our staff work. We seek students passionate about racial and social equity with excellent writing and interpersonal skills.

The available positions are:

- **Research Intern**: The Research Intern will assist in ongoing research of state and local housing trust funds (such as who they serve, how they are funded, what activities they support) or other state housing programs, write articles on current research for *Memo to Members & Partners*, attend briefings, and respond to research inquiries. Interested students should submit a cover letter, resume, and writing sample to Andrew Aurand via email at: aaurand@nlihc.org.
- **Communications Intern**: The Communications Intern will assist the NLIHC Communications Team in the creation and production of a wide range of communications materials and projects, including but not limited to, social media content, Instagram Reels, written and digital publications, fact sheets, reports, toolkits, newsletters, website content, email marketing campaigns, YouTube thumbnails, graphics, infographics, videos, webinars, and other multimedia assets. Applicants should have strong written and verbal communication skills and experience with communications, marketing, digital media, content creation, or related fields. Familiarity with Adobe Creative Cloud (Illustrator, After Effects, Premiere, Photoshop), Canva, Adobe Express, social media platforms, and content management systems is preferred. Please provide a resume, cover letter, and three relevant work samples (such as writing, social media, design, video, or other communications projects). Interested students should submit their materials to CommunicationsTeam@nlihc.org. Please include the subject line: "Application: Communications Intern - 'Your Name'"

For more information about this opportunity and others at NLIHC, visit: https://nlihc.org/about/opportunities

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NLIHC News

NLIHC in the News for the Week of August 10

The following are some of the news stories to which NLIHC contributed during the week of August 10:

- “Why Florida’s Property Tax Change Is Bad News for Renters,” *Newsweek*, August 10, at: https://tr.ee/GbBLJI
- “Seattle 'junk fee' ban passes unanimously,” *Fox 13 Seattle,* August 12, at: https://tr.ee/k0WNjU
- “America’s Loneliness Trap,” *Slate*, August 13, at: https://tr.ee/AkOrsY

Where to Find Us – August 17

- AASC Conference – Austin, TX, August 23-24 (Tia Turner)
- Florida Housing Coalition Conference – Orlando, FL, August 24-26 (Libby O'Neill)
- Utah Housing Matters Conference – Midway, UT, August 31-September 2 (Kim Johnson)
- National American Indian Housing Council (NAIHC) & HUD's National Tribal Housing Summit – Washington, D.C., September 1-3 (Kayla Blackwell)
- Housing Matters Conference – Champaign, IL, September 30 (Renee M. Willis)
- SDHF 2026 Affordable Housing & Community Development Conference – San Diego, CA, October 1 (Kim Johnson)
- SCANPH Annual Conference – Los Angeles, CA, October 8 (Kim Johnson)
- Housing WA Annual Conference – Spokane, WA, October 20-22 (Renee M. Willis)
- Housing Justice Network Conference – Atlanta, GA, November 9-11 (Sarah Abdelhadi)

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