Memo To Members & Partners
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Budget and Appropriations

Join November 10 Day of Action to Demand Congress Block Harmful OMB Proposal and Provide Needed Housing Investments in FY27

By Kim Johnson, NLIHC Senior Director of Policy

Keywords: Budget and Appropriations, THUD, HUD, FY27

Members of the House and Senate will return to their Washington, D.C. offices on November 9 and will have just five weeks in session before the end of the 119th Congress. With time limited and an ongoing stalemate over fiscal year (FY) 2027 spending negotiations, it is unlikely that Congress will be able to reach an agreement on a final FY27 spending bill for HUD programs before the end of the year. Without final FY27 spending bills in place, members will need to pass another continuing resolution (CR) before December 11, when the current CR expires, to ensure federal programs and services remain funded and the government does not shut down.

The Next CR Must Protect Federal Funding

NLIHC and our partners in the Campaign for Housing and Community Development Funding (CHCDF) are joining the National Council of Nonprofits' (NCN's) November 10 Day of Action to urge Congress to include language in the CR permanently blocking implementation of the

Office of Management and Budget's (OMB's) proposed rule, "Regulation for Federal Financial Assistance."

If finalized, the proposal would reshape the framework for federal funding awards across agencies to ensure funds are not used to support programs that run afoul of the administration's policy positions, including programs that support disparate impact; diversity, equity, inclusion, and accessibility; or "gender ideology." NLIHC strongly opposes the rule, particularly due to its potential impact on federal housing programs, and is calling on Congress to permanently block its implementation. CHCDF is also launching an organizational sign-on letter highlighting the rule's potential impact on housing programs and calling on Congress to permanently block its implementation. Read and join the letter.

In addition, NLIHC and our partners at the National Alliance to End Homelessness (the Alliance) are calling on Congress to include language in the next CR that would protect funding for the Continuum of Care (CoC) program by requiring HUD to non-competitively renew all CoC projects expiring in FY26 for 12 months. HUD's CoC program, the backbone of the nation's homelessness response system, provides funding to thousands of communities around the country for services like permanent supportive housing. The Trump administration has proposed drastic changes to the program that would disrupt communities' homelessness response efforts and put an estimated 97,000 people who had previously been experiencing homelessness at risk of losing their housing.

The Alliance is hosting a November 18 Day of Action for advocates to push for language in the next CR protecting funding for CoC programs and the people who rely on them. Learn more and access the Alliance's toolkit for the day of action here.

Take Action!

Join the November 10 Day of Action: Mark your calendars for NCN's November 10 Day of Action, and join in using the resources below:

- *Organizations can join CHCDF's sign-on letter opposing the OMB proposed rule by November 6*. The letter highlights the specific harm OMB's rule poses to federal affordable housing, homelessness, and community development programs, and calls on leadership to block the rule's implementation. CHCDF will send the sign-on letter to Congress as part of the November 10 Day of Action. Organizations can also join NCN's broader sign-on letter opposing the OMB rule.
- *On November 10, use NCN's resources to call or email your members of Congress, and urge them to block OMB's proposed rule.* Learn more about key changes in the proposal and its impact on housing programs.

Email or call your federal elected officials and urge them to protect and expand investments in affordable housing, homelessness, and community development resources:

- *Use NLIHC's Take Action page to look up your member offices or call/send an email directly*, and urge them to provide increased investments in affordable housing,

homelessness, and community development programs in HUD's final fiscal year (FY) 2027 spending bill, including NLIHC's priorities:
    - Provide at least $45.6 billion for TBRA programs, which would be enough to renew all current TBRA contracts.
    - Invest at least $5.1 billion in HUD's Homeless Assistance Grants (HAG) program.
    - Fully fund the Public Housing Operating Fund at the full, formula-determined need, plus $598 million to address the cumulative shortfall in Public Housing operations reported in FY25 and provide increased funding for the Public Housing Capital Fund to begin addressing the capital needs backlog in Public Housing.
    - Invest in accessible, affordable homes for older adults and people with disabilities by fully renewing all existing PBRA contracts and Project Rental Assistance Contracts (PRACs) and expanding funding for the Section 202 Housing for the Elderly and Section 811 Housing for Persons with Disabilities programs.
    - Provide at least $15 million for HUD's Eviction Protection Grant Program (EPGP), which gives communities grants to establish right to counsel and other programs that help people avoid eviction and remain housed.
    - At least maintain $1.1 billion for the Indian Housing Block Grant (IHBG) program and increase funding for the IHBG-Competitive program to $150 million, targeted to Tribal communities with the most urgent housing needs.
    - Language blocking implementation of other harmful proposed changes by HUD, including the Equal Access rule, "Mixed-Status" rule, and disparate impact rule.
- *Organizations can also join CHCDF's fiscal year (FY) 2027 sign-on letter* calling for increased investments in HUD's and USDA's affordable housing, homelessness, and community development programs.
- *Use the National Alliance to End Homelessness's (Alliance's) Advocacy Toolkit to protect funding for Continuum of Care (CoC) programs.* NLIHC and our colleagues at the Alliance are calling Congress to include language in the next CR requiring HUD to non-competitively renew all expiring CoC projects for 12 months. Access the Alliance's Continuing Resolution Activation Toolkit here to learn more and join the Alliance's upcoming National Day of Action on November 18!

HUD

Government Accountability Office Documents the Impact of DOGE at HUD

By David Gonzalez Rice, NLIHC Senior Vice President of Public Policy

Keywords: GAO, new report, workplace reductions, HUD spending

The U.S. Government Accountability Office (GAO) released a report, "Department of Housing and Urban Development: 2025 Workforce and Spending Changes," examining how workforce reductions and cuts or delays in grant and contract spending at the U.S. Department of Housing and Urban Development (HUD) affected the agency's operations. The report documents

disruptions reported by housing organizations and local agencies that rely on HUD to administer affordable housing and fair housing programs mandated by Congress.

GAO Report Summary

The report found that HUD's workforce decreased by 29% between December 2024 and December 2025, falling from approximately 8,800 to 6,300 employees. More than half the employees who left had worked at HUD for 10 years or more, many with more than 20 years of service. At the same time, more than half of HUD's grant programs made no new awards in fiscal year 2025, and the agency terminated 144 of its 675 active contracts in 2025, representing approximately $367 million mostly for professional or IT services.

To understand the effects of these changes, GAO interviewed representatives of 20 local and national housing organizations, including public housing agencies, fair housing organizations, property managers participating in the Section 8 Project-Based Rental Assistance program, and national housing groups. NLIHC, along with several of its members and State Partners, provided interview responses to GAO investigators. The final report reflects the insights and experiences of affordable housing providers and advocates.

Impacts on Communities

Stakeholders described widespread confusion and operational challenges following the spending changes and loss of experienced HUD staff. Nearly all reported that established points of contact had departed, often without warning or a transition plan. Organizations said that finding reliable guidance had become more difficult, while new agency contacts sometimes lacked the institutional knowledge needed to resolve complex program questions. Stakeholders also reported canceled meetings, inconsistent guidance, delays in communication, and loss of access to HUD IT systems, such as grant portals.

The report highlighted consequences for fair housing activities and affordable housing operations. Fair housing organizations reported reducing services or staffing during funding disruptions, while housing providers described delays in rental assistance payments, assistance with HUD technology platforms, and physical inspections of HUD-assisted properties. These disruptions undermined organizations' ability to carry out activities authorized and funded by Congress.

Non-responsive HUD

GAO noted that HUD did not respond to requests for information throughout the audit. Notably, HUD did not provide requested information about the efficiency initiatives it has reportedly undertaken since January 2025, leaving Congress and the public unable to assess HUD's claims about the effects or potential of these initiatives.

Read the GAO Report.

Our Homes, Our Votes

Register for NLIHC's *Our Homes, Our Votes* National Webinar: "Election Protection: Ensuring Voter Access & Overcoming Suppression in 2026"

By Dani Patel, NLIHC Strategic Partnerships & Campaigns Intern

Keywords: GOTV, election protection, voter access, 2026 Midterms

Join NLIHC's *Our Homes, Our Votes* Campaign for the final voter mobilization webinar before Election Day! On **Monday, November 2**, at **3:00 pm ET**, panelists will discuss election protection information, equipping housing advocates with the necessary tools to protect voter access and combat suppression.

As we approach the 2026 Midterm Elections, OHOV is highlighting the important role advocates play in ensuring residents have fair access to voting, regardless of their income or housing status. The upcoming webinar will address voter suppression threats so advocates can effectively respond and ensure community members can meaningfully participate in democracy. The webinar will also uplift local-level efforts by OHOV's mini-grant recipients to highlight successful voter turnout strategies.

What to Expect

- Election protection resources: Learn about resources available to help voters navigate challenges and access support.
- Know your rights: Explore information and tools to help residents understand their voting rights and identify where to turn for assistance.
- Overcoming barriers to voting: Hear about efforts to address voter suppression, voter intimidation, and other challenges that can interfere with voter access.
- Tools for the final stretch: Identify practical, nonpartisan ways housing advocates and community organizations can help residents prepare for Election Day.
- Building civic power: Connect with partners and organizations working to strengthen voter access and civic participation in communities across the country.

Featured Speakers

Zaria Guignard, Manager of Census and Civic Engagement
Asian Americans Advancing Justice | AAJC

Zaria will share "Know Your Rights" information to ensure residents can exercise their civil right to vote, as well as multilingual voting resources and language access information.

Gabrielle Velasco, Election Protection Expert
State Voices

Gabrielle will discuss election protection education and resources, offering tools for housing advocates to ensure everyone's voice is heard this upcoming election.

Tasha White	**Lisa Gordon**
HELP Carolina	Chinatown Community Development Center

Tasha and Lisa will highlight the work their organizations achieved through NLIHC's *Our Homes, Our Votes*' mini-grant program, giving housing advocates and organizers strategies to effectively engage community members.

The webinar is encouraged for community members in the housing and civic advocacy space. This upcoming Midterm Election will see every member of the House of Representatives, and one-third of the Senate on the ballot. Other state and local races will decide the future of affordable housing solutions. Election Day is an important opportunity for advocates, leaders, and service providers to ensure residents can exercise their fundamental right to vote, and that our democracy is truly representative.

Don't miss the final opportunity of 2026 to get equipped for Election Day!

Register for the webinar.

Watch previous OHOV webinars.

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 OHOV on Instagram.

A Year in Review: *Our Homes, Our Votes* 2026 Election Reflection

By NLIHC *Our Homes, Our Votes* Team

Keywords: Election Day, 2026 Midterms, voter engagement

With Election Day just around the corner, it's time to rally, mobilize, and ensure residents' voices are heard! NLIHC's *Our Homes, Our Votes* (OHOV) Campaign is celebrating a year of partnership, learning, and action to strengthen nonpartisan voter engagement in communities across the country. Through our national webinar series, we've brought housing advocates and civic engagement partners together to share timely information, expert insights, and practical tools. Through our mini-grant program, organizations have brought civic engagement directly into their communities, helping renters and residents participate in the electoral process. Now, as we enter the final stretch before Election Day, let's build on that momentum! We're celebrating the incredible work of our grantees and partners and sharing resources to help the OHOV

network encourage participation, empower residents, and ensure every voice has the opportunity to be heard.

Webinar Series

Our Homes, Our Votes' 2026 webinar series brought together experts in the housing and civic space for discussions focused on advancing voter engagement among low-income renters. After the recent *Louisiana v. Callais* decision weakened civil rights protections under the "Voting Rights Act," OHOV's webinars were an opportunity to mobilize housing advocates to support the voting power of underrepresented communities. Throughout the webinars, advocates learned how to wield their power as a trusted messenger to support civic engagement by registering voters, combatting misinformation, and protecting voting rights. The webinars also spotlighted the obstacles low-income renters and unhoused residents face in casting their ballot, and the intervention tactics housing nonprofits can use to lower barriers. Panelists also shared key resources for advocates to use, including OHOV's TurboVote tool and Resource Hub, National Voter Registration Day's Partner Resources, and the Legal Defense Fund's State Voting Rights Act information.

Mini-Grant Program

To support nonpartisan voter registration, *Our Homes, Our Votes* awarded 50 organizations $1,500 mini grants to help local nonprofits engage their communities. Alongside technical assistance from OHOV, organizations created their own initiatives to address the needs of their residents. Nonprofits across the country built local power and educated residents through tenant rights workshops, candidate questionnaires, and voter registration drives. Through the work of the mini-grant recipients, residents were educated and prepared to exercise their right to vote.

2026 Midterm Election Resources

With Election Day just around the corner, *Our Homes, Our Votes* has gathered resources to help housing advocates support nonpartisan voter participation and ensure residents have the information they need to make their voices heard.

Turning Renters into Voters: Lessons in Engaging Low-Income Communities: A best-practice report by *Our Homes, Our Votes* with practical strategies housing and homelessness organizations can use to increase voter turnout: https://nlihc.org/publications/our-homes-our-votes-turning-renters-voters.

TurboVote: An online, nonpartisan voter registration and information platform where you can register to vote, update your registration, sign up for election reminders, and find key deadlines, state-specific rules, and other election information for your community. TurboVote is available in both English and Spanish and can be used to engage community members: https://ourhomes.turbovote.org/.

866-OUR-VOTE: A national, nonpartisan initiative under the Lawyers' Committee for Civil Rights Under Law that works year-round to ensure that voters have an equal opportunity to vote

and have their votes counted. It offers multilingual voter hotlines and opportunities to get help from trained volunteers: https://866ourvote.org/.

VOTE411.org: An online voter education resource from the League of Women Voters that provides election-related information, including a voter registration tool, polling place lookup, and state-specific ballot guides: http://vote411.org.

Rideshare2Vote AWARE: A nonpartisan organization that provides barrier-free rides to the polls in 13 states and counting. They also offer volunteering opportunities to support other voters in your community: https://rideshare2voteaware.org/.

VoteRiders: An educational platform to teach voters about voter ID laws and help citizens secure the IDs they need. VoteRiders operates a helpline to answer voters' questions and provides practical, legal, and financial assistance for voters who need to obtain their documents: https://www.voteriders.org/.

Spread the Vote: Spread the Vote obtains voter identification for eligible voters in states with strict voter ID laws, creates election guides and educational tools, assists incarcerated voters with mail-in voting, and helps voters make and carry out voting plans: https://www.spreadthevote.org/.

Every One Votes: A campaign of the National Alliance to End Homelessness that supports people who are experiencing homelessness to exercise their right to vote. Providers can access resources and tools to support clients registering to vote: https://tr.ee/dMldsy.

You Don't Need a Home to Vote: A campaign of the National Coalition for the Homeless that promotes voting access by engaging people experiencing homelessness in the democratic process: https://nationalhomeless.org/voting/.

REV UP: A nonpartisan campaign launched by the American Association of People with Disabilities (AAPD) that coordinates with national, state, and local organizations to increase the political power of the disability community: https://tr.ee/Yfcxay.

Patient Voting, a program of VOT-ER: Collects and publicizes state-specific information about the process of voting for people who are unexpectedly hospitalized in the days or weeks prior to an election: https://www.patientvoting.com/.

Affordable housing solutions are shaped by empowering community members through voter education and registration. Housing advocates are uniquely equipped to uplift underrepresented communities, and we encourage leaders to utilize OHOV's resources to build local power.

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 OHOV on Instagram.

Generation Housing Justice

Generation Housing Justice Application Now Open

By Thaddaeus Elliott, NLIHC Housing Advocacy Organizer

Keywords: fellowship, college students

Applications are now open for the 2027 cohort of *Generation Housing Justice*, NLIHC's fellowship for young adults. *Generation Housing Justice* mentors young adults between the ages of 18 and 24 to develop their leadership in national affordable housing advocacy. Through skill development, community building, the annual fellowship, and professional networking, the fellowship creates a supportive network of alumni prepared to pursue vocations in the housing justice movement.

The fellowship will run for six months from January through June 2027. Fellows will complete a self-guided course covering the basics of federal policymaking, factors driving the housing affordability crisis for low-income people, policy solutions, advocacy and community organizing skills, and narrative change for housing justice. The cohort will be required to attend biweekly, 90-minute meetings to dive deeper into these topics.

Fellows will complete a group capstone project culminating in a 45-minute presentation to NLIHC staff. Through their presentations, each group will provide a recommendation or consideration for NLIHC's work in at least one of the following areas: policy, research, or organizing. Recommendations will identify potential opportunities, gaps, and threats relative to NLIHC's current scope of work.

Fellows also will attend NLIHC's Annual Policy Forum and Capitol Hill Day in Washington, DC, March 2-5, 2027. All fellows will receive a stipend upon successful completion of the fellowship and its requirements.

Qualified applicants for *Generation Housing Justice* must:

- Be between the ages of 18 and 24 as of January 1, 2027.
- Be a current advocate or activist, postsecondary student, recent graduate of a postsecondary program, or early career young professional with an interest in housing justice and public policy.
- Have lived experience of housing insecurity.
- Be committed to advancing racial and social justice through housing policy work.
- Be passionate about collective action, civic engagement, and empowering community members to take action.
- Be a current active individual member of NLIHC or actively engaged with an NLIHC member organization. (Note: Becoming an individual member or having an affiliation with a member organization will be required if selected for the fellowship).

The application will close Friday, November 13 at 5:00 pm ET. Applicants will be notified by Friday, December 11.

For questions regarding *Generation Housing Justice* or the application process, please contact Thaddaeus Elliott, Housing Advocacy Organizer, at outreach@nlihc.org.

Reentry Housing

NLIHC Releases New Report on Expanding Housing Access for Formerly Incarcerated and Convicted People

By Kim Johnson, NLIHC Senior Director of Policy

Keywords: Budget and Appropriations, THUD, HUD, FY27

Last week, NLIHC released *The State of Reentry Housing Policy: A Partnership for Just Housing Convening Report*, a compilation of lessons learned from enacting and implementing state and local fair chance housing policies, which aim to increase housing access for formerly incarcerated and convicted people.

In June 2026, the Partnership for Just Housing (PJH)—a national collaborative of directly impacted leaders and other advocates working to end housing discrimination against people impacted by the criminal-legal system—convened to discuss reentry housing legislation that can be implemented at local, state, and federal levels. The report includes key findings and recommendations from this convening on creating, enacting, and implementing fair chance housing policies that protect and expand housing opportunities for formerly incarcerated and convicted people and their families. Some of the takeaways in the report include:

- *Ensuring formerly incarcerated and convicted people are at the table when designing fair chance housing and other reentry housing policies.* Formerly incarcerated and convicted people are also vital messengers in helping build public support for fair chance housing policies.
- *Treating housing as a key part of reentry planning.* Ensuring people exiting incarceration are connected to housing as part of their pre-release planning is crucial to ending the cycle of incarceration, homelessness, and reincarceration.
- *Fostering partnerships to help expand capacity and build support.* Building coalitions with local housing and criminal legal system reform advocates, cross-sector and national partners.
- *Including education, enforcement, and evaluation mechanisms in legislation.* Education, enforcement, and evaluation provisions help ensure the law is effective, build evidence on the impact of fair chance housing policies, and identify needed improvements.
- *Providing funding for implementation and enforcement.* Dedicating a source of funding specifically to fair chance housing implementation and enforcement, including tenant education and outreach, legal aid, and program evaluation.

Read and download the report.

Public Charge

Frontline Providers – Join PIF's Letter Calling on State Attorneys General to Stop Public Charge

By Kayla Blackwell, NLIHS Senior Housing Policy Analyst and Lucas Eisenberg, NLIHC Policy Intern

Keywords: public charge, PIF, litigation, litigating, providers, DHS, immigration, immigrants, public benefits, public housing

The Protecting Immigrant Families Coalition (PIF) released a sign-on letter for individual direct service providers to call on state Attorneys General to join a coalition of 22 States and D.C. litigating against the Department of Homeland Security's (DHS) final rule on public charge (see *Memo*, 9/21). The final rule, effective September 18, 2026, affords DHS officers broad discretion in determining which public benefits can be considered in the "public charge" assessment for Lawful Permanent Residence ("green card") applications. This rule will likely cause a significant chilling effect on immigrant families' willingness to access major health, nutrition, and other services, causing devastating economic consequences for millions of low-income immigrants. PIF encourages providers to share anonymous or public stories in their work experience about the harm caused by the new public charge rule, using this sign-on form.

PIF is a coalition of over 800 member organizations advocating to empower, mobilize, and educate immigrant communities on their rights to public benefits. PIF's work is multisectoral, as campaigns may take place on the ground in the form of public outreach, in government by working with members of Congress, and in public discussion through changing narratives by uplifting immigrants. Read more about PIF's efforts.

Background on Public Charge

The "public charge" inadmissibility test has been a part of federal immigration law for over 140 years. The public charge test considers whether an immigrant will depend on government assistance as their main source of support. The test does not apply to all immigrants but instead applies to people applying for a green card (Lawful Permanent Resident status) through their family members or a visa to come to the United States. Permanent residents seeking citizenship are not subject to the public charge determination. Additionally, humanitarian immigrants seeking permanent residency are exempt. PIF has a "Does this apply to me?" resource for additional background on when public charge applies.

Under the first Trump administration, DHS finalized a public charge rule in 2019 that considered Supplemental Nutrition Assistance Program (SNAP) and housing assistance program benefits in the public charge test, a departure from how public charge had been historically evaluated. The

Biden administration revoked the public charge rule in 2022, replacing it with a rule prohibiting the public charge test from considering SNAP, Medicaid, public housing, and other benefits. See PIF's "What changed with public charge?" for a side-by-side comparison.

In November 2025, the Trump administration's DHS proposed to broaden the public charge evaluation again. DHS issued the final public charge rule in July 2026, replacing the 2022 rule. The new public charge rule gives DHS broad discretion on what benefits to examine. Additionally, DHS is given authority to consider assistance given to citizen members of immigrant households.

On September 14, New York Attorney General Letitia James announced that a coalition of 22 states and the District of Columbia filed a federal lawsuit challenging the rule, alongside a separate lawsuit from a coalition of major cities and counties led by New York City Mayor Zohran Mamdani. Litigation against public charge has been previously successful, and the current lawsuit argues the decision made by the government to be "arbitrary and capricious".

Take Action: Sign-On to PIF's Letter and Share Your Story!

Providers in nursing, case work, enrollment assistance, legal service, benefit navigation, childcare, eldercare, food bank administration, and all other fields who support immigrant families are welcome to sign-on to PIF's letter. The letter urges state Attorneys General to "join existing litigation, file suit, or otherwise support efforts to prevent or narrow the rule's harmful effects". The letter also calls on local agencies to promote clear state guidance on which immigrants are impacted and to use consumer protection authority to ensure bad actors do not take advantage of the confusion created by the rule.

In addition, PIF is inviting all providers to share their experiences how the public charge rules are affecting their work. Providers may choose to tell their stories anonymously or publicly. These experiences are to be told in a personal, individual capacity, and providers may opt for future advocacy and training opportunities. Those who sign-on and share a story are encouraged to share the page with colleagues, friends, and family.

Join PIF's Provider Sign-on Letter.

Access PIF's toolkit and resources.

Read the final rule.

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

Rural Housing

NLIHC Submits Comment Expressing Concern on U.S. Department of Agriculture's Proposal to Rescind Federal Construction and Repair Regulations for Rural Housing Programs

By Kayla Blackwell, NLIHC Senior Housing Policy Analyst and Lucas Eisenberg, NLIHC Policy Intern

Keywords: rural housing, USDA, Agriculture, construction and repair, regulations, rural housing service

NLIHC submitted a comment on October 19 responding to the U.S. Department of Agriculture's (USDA) Notice of Proposed Rulemaking (NPRM) to revoke federal construction and repair standards for projects funded by USDA Rural Development programs. The proposed rule rescinds rural development regulations in federal regulatory code, known as "7 CFR Part 1924," and justifies the removal by claiming that existing state and local requirements are sufficient to ensure federal investments are well protected.

NLIHC's comment expresses concern that by rescinding this regulation, the NPRM fails to adequately account for the impacts on people with the lowest incomes. The proposed rule does not ground its assertion that state and local building codes are adequate to regulate developments in evidence. In the comment, NLIHC describes the scale at which rural housing residents suffer from poor conditions and critiques USDA's view that removing regulations in communities with inadequate housing would not result in harm. USDA additionally did not identify any protections that could be lost if the final rule were to be finalized, nor were any possible drawbacks detailed. Finally, NLIHC finds that the proposed rule's Civil Rights Impact Analysis is insufficient to prove that communities of color and people with disabilities would not disproportionately suffer from the change.

Background on USDA Rural Development Programs and 7 CFR Part 1924

USDA's rural development programs typically come in the form of loans rather than direct management of property. These loans are given to private developers of rental housing for elderly people and families in rural areas and are conducted through the Section 515 program. Alongside Section 515, many other programs exist for similar purposes. Section 514 loans are given to rental housing for farm workers. Tenants of the rental housing can apply for Section 521 Rental Assistance. Finally, banks can have their loans to rural rental housing guaranteed by the government under Section 538.

However, Section 515 has not been able to develop new rental properties since 2011. The appropriation for the program, at this moment, is entirely spent on preserving the housing stock under Section 515. Many properties will reach the end of their loan term in 2028, and more maturity is expected at a faster pace in future years. With these properties exiting Section 515, some even paying off loans early, many tenants across rural America will lose their rental assistance, as Section 521 is tied to the property overseen under Section 515.

At a time when the Section 515 stock is dwindling (see Memo, 6/6), USDA is adding more uncertainty to the program by removing federal construction and repair standards. 7 CFR Part 1924, the federal regulation that could be removed if the proposal is finalized, defines the policies with which these properties must comply if they are to receive loans. Some of these policies include conduct related to inspection of buildings, contract terms developers must abide by, and a comprehensive review done by the district director. However, USDA's proposal would cancel these regulations.

NLIHC Comment to USDA's NPRM

NLIHC highlights in the comment letter that there are a significant number of rural homes in poor conditions. Citing 2021 American Housing Survey data, the comments note that more than 1.4 million homes in rural communities suffer "inadequate conditions," with 368,000 homes deemed as "severely inadequate," including a lack of heating, plumbing, and electricity. Additionally, low-income families in rural housing experience increased rates of overcrowding due to supply and income concerns. In total, 30% of rural households experience problems like cost burdens, physical deficiencies, or overcrowding in their housing.

The decision to rescind 7 CFR Part 1924 from federal code could risk further deterioration of rural housing. USDA does not detail any estimates on what the impact of rescinding the federal standards may be. The NPRM assures that state and local standards are sufficient, but no study or research is shown proving that these lower-level jurisdictional requirements are enough to protect against poor conditions. No evaluation is conducted to prove that meaningful requirements would not be lost due to this rescission. The NPRM also provides little information on how USDA arrived at the conclusion that state and local protections are satisfactory.

Another large problem is the potential civil rights impacts that could occur as a result of USDA's proposal. Poor housing conditions in rural housing are prevalent among low-income families and renters, with 50% of households suffering from inadequate housing quality being renters. Beyond income, housing issues in rural America are most pervasive in geographic regions like the Lower Mississippi Delta, the southern Black Belt, Native American lands, and along the U.S.-Mexico border. Communities of color in rural regions could end up most impacted by the changes. USDA asserts a Civil Rights Impact Analysis was conducted to identify potential civil rights impacts but does not detail any findings from the analysis or how the insights prove disproportionate impact on minority communities is not a concern.

Read NLIHC's comment.

Read the NPRM.

Read NLIHC's Rural Housing Needs Factsheet.

Read about USDA Rural Rental Housing Programs in Chapter 4 of NLIHC's *2026 Advocate's Guide*.

Opportunity Starts at Home

SchoolHouse Connection Releases 2026 Infant and Toddler Homelessness Report

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

Keywords: homelessness, infant and toddler homelessness

SchoolHouse Connection, an *Opportunity Starts at Home* (OSAH) Roundtable member, released a new report, *Infant and Toddler Homelessness Across 50 States*, which analyzes homelessness experienced by children from birth to age three across the country. The report shares the estimated incidence of homelessness and enrollment in early childhood development programs among infants and toddlers at the national and state levels during the 2023-2024 program year. A child's brain develops faster than at any other time between birth and age three, and the report finds that an increasing number of infants and toddlers experience homelessness during these critical years, negatively impacting their development, health, and future economic security. The report emphasizes the need for collaboration and alignment across housing, homelessness, early childhood, healthcare, and data systems to prevent and address infant and toddler homelessness and recommends actions at the federal, state, and local levels to increase access to housing, homeless assistance, health services, and early childhood development programs.

SchoolHouse Connection, in partnership with Poverty Solutions at the University of Michigan, gathered and analyzed data to estimate the number of infants and toddlers experiencing homelessness in each state and nationally, as well as how many participate in early childhood development programs. This year's report estimates that more than half a million infants and toddlers experienced homelessness in 2023-2024, the highest estimate in the past 3 years of the report's analysis. Less than one in ten infants and toddlers experiencing homelessness were enrolled in Early Head Start, a home visit program, or a local educational agency early childhood program. These programs reduce the developmental harms associated with homelessness and connect families to housing, healthcare, and other supports, but families experiencing homelessness face numerous barriers to enrollment. Existing data on babies and expectant parents experiencing homelessness are inadequate and difficult to access across key federal and state data systems, and these data gaps lead to insufficient program design, evaluation, and funding.

Addressing infant and toddler homelessness requires coordinated action across housing, homelessness, early childhood, healthcare, and data systems. Recommendations for action align with the four priority areas of the Thrive from the Start Initiative, a cross-sector effort led by Housing Is, the National Collaborative for Infants and Toddlers, Prevent Child Abuse America, SchoolHouse Connection, and ZERO TO THREE. The report provides specific examples of each recommendation organized at local, state, and federal levels. These recommendations include:

- Expanding access to shelter, permanent housing, and prevention services.
- Increasing access to early childhood development programs and support services.
- Improving data collection, analysis, use, and coordination.
- Integrating healthcare and housing services.

Read the report.

Learn more about the Thrive from the Start initiative.

To learn more about the connections between housing and child anti-poverty, read the OSAH fact sheet.

Strategic Partnerships

Sip & Connect with NLIHC

By May Louis-Juste, NLIHC Project Manager, *Strategic Partnerships*

Keywords: networking, events, Washington, DC

If you're in the Washington, DC area on November 17, please join NLIHC for an in-person event and an opportunity to engage in conversation and connection with professionals, advocates, partners, and community members working to advance affordable housing solutions.

This is an opportunity to build relationships across sectors, exchange ideas, and explore ways to collaborate on the policies and partnerships that move housing justice forward. Light bites and your first beer or wine are on us.

Registration is free, but space is limited. Register today!

As the year closes, we invite you to support NLIHC's work to ensure everyone has a safe, affordable place to call home. Donate today!

Tenant Talk Live

Join Today's (11/2) "Tenant Talk Live": Your Vote, Your Voice, Your Representation – The 2026 Elections, the Decennial Census, and Housing Justice

By Dee Ross, NLIHC Tenant Leader Fellow
Keywords: Tenant Talk Live, 2026 Elections, Decennial Census, Housing Justice, Voter Rights, Representation

Join today's "Tenant Talk Live", a monthly Zoom meeting for tenant and resident leaders, at 6:00 pm ET (5:00 pm CT, 4:00 pm MT, and 3:00 pm PT). NLIHC's *Our Homes, Our Votes* project manager Tia Turner and Senior Director of Policy Kim Johnson will discuss the importance of representation and voting. Hear from Tia about voter preparedness for election day and the Census Bureau's proposed changes to the Decennial Census that threaten fair

representation in Congress. Kim will discuss the significance of Tuesday's elections to federal policy.

Please join us! We look forward to seeing you.

"Tenant Talk Live" connects with and engages tenants and tenant leaders across the country. If you are a low-income tenant and have a topic you would like to propose for an upcoming Tenant Talk Live, or if you would like to participate as a speaker on an upcoming call, please email Dee Ross at dross@nlihc.org

Register for today's call here.

Follow "Tenant Talk Live" on its Facebook group.

Research

Opportunity Zones Associated with Increased Construction Activity

By Carter Horner, NLIHC Research Intern

Keywords: Opportunity Zones, construction, displacement

In 2017, Congress passed the "Tax Cuts and Jobs Act," which established Opportunity Zones (OZs) designed to trigger investment in low-income communities. In September, the Brookings Institution published a report, "Opportunity Zones: Analyzing the Tax Incentive's Impacts, and How to Enhance Them," on the effect of OZs on building activity. After finding increases in building activity in a majority of OZs, they recommend a permanent iteration of the program.

Under the OZ program, investors receive tax benefits for investing profits into low-income census tracts designated "Opportunity Zones." Congress designed the OZ program around flexibility with the idea that investors could secure tax benefits for capital gains on any investment as long as it was in an OZ census tract. OZ census tracks were split into five types: rural, commercial, single-family home, mixed residential, and multi-family home.

For the study, Brookings analyzed building activity over the last seven years in 7,174 OZs across the nation using data from Cotality. The data lists every building constructed between 2017 and 2024 for each census tract, as well as total state-level building reports, Brookings compared OZ construction activity against that of all census tracks with available data. Building activity consisted of all buildings constructed, not just residential.

In a context of declining U.S. construction, the OZ program coincided with an increase in construction activity. Building activity per capita rose 24% between 2017 and 2021. Forty-six percent of OZs saw at least a 15% increase in building activity, with 16% seeing greater than a 100% increase in building activity. Just over 15% also saw building activity where there was none before. Furthermore, while national building activity had declined to its 2017 levels by

2024, rates in OZs remained 28% higher in 2024 than in 2017. OZs also saw an increase in share of the building market in 2019-2024 compared to 2017-2018. North Carolina, Florida, and Texas are notable examples where OZs contributed greatly to the overall state increase in national market share of building activity.

The type of OZ affected the success of the program, with commercial zones and multi-family zones both increasing the gap in building activity between all census tracks and low-income census tracks. The gap shrunk for residential mixed zones and closed completely for rural and single-family zones. For commercial zones and multi-family zones, their tendency to be near metropolitan areas likely contributed to the decline, as the dates of study coincided with the pandemic, which decreased demand for urban construction. The one other characteristic to have a significant positive effect on building activity across tract types was the amount of new housing stock (housing built since 2009). Other characteristics such as job growth, small businesses, and tract size had positive effects for some tract types and not others.

For most OZs, growth did not coincide with displacement, defined as "a loss of total population or population of a plurality racial-ethnic group." OZs that saw accelerated growth also tended to see less displacement. It is possible, however, that census tracts starting with lower levels of displacement could have had preexisting infrastructure and conditions for accelerated growth in building activity, rather than increased building activity itself being a cause for lower rates of displacement.

While a third of OZs outperformed the U.S. overall in building growth, a third saw a decline in building activity after implementation. The authors suggest a couple of potential reasons for this, such as 35% of OZ dollars going into only the top 20% of OZs by income or tract type affecting the success of the program. Rural tracts, for instance, consistently saw lower building activity, and mixed residential tracts usually saw either dramatic increases or decreases in activity.

The authors conclude that OZs successfully sparked construction growth in tracts with a foundation for investment. While OZs fall short in certain areas, with the right conditions and a targeted approach, OZs can have dramatic positive effects on both building activities. They also recommend future research examining the effect of OZs on economic outcomes other than building activity. The authors recognize that OZs are not a universal solution and should be part of a larger housing strategy, supporting the second and permanent iteration of the program with the knowledge that states can use their findings to directly target census tracts with the most appropriate housing policy.

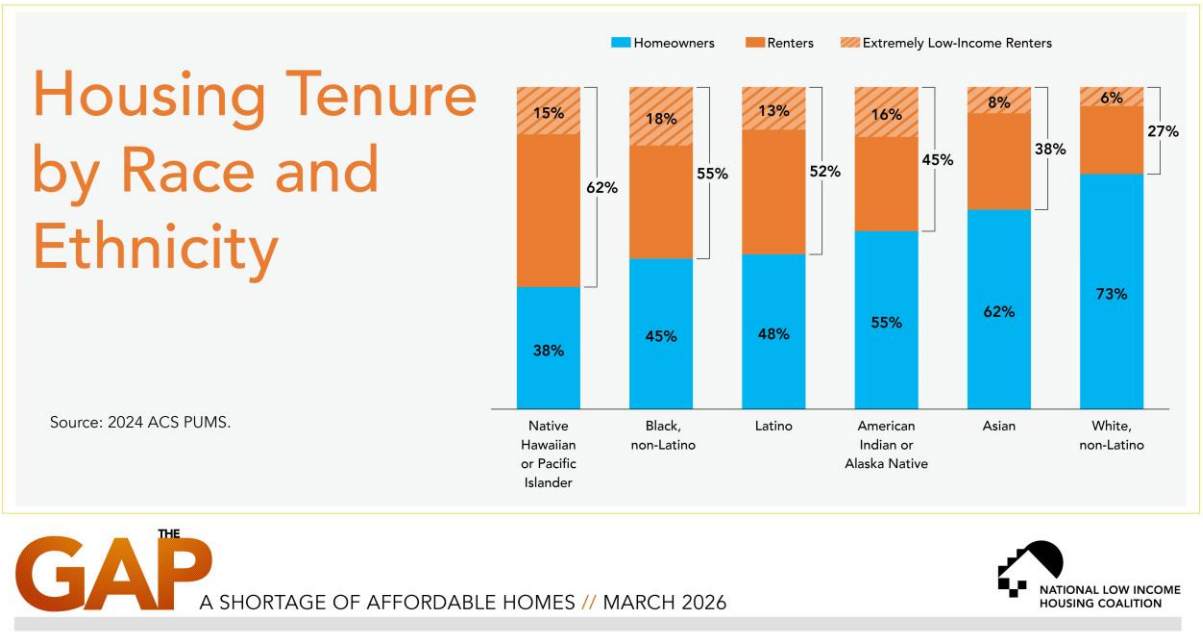
Read the report: Opportunity Zones: Analyzing the Tax Incentive's Impacts, and How to Enhance Them

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Fact of the Week

Black Households are Three Times and Latino Households are Two Times More Likely than White Households to be Renters with Extremely Low Incomes

Keywords: Housing, Tenure, Race, Ethnicity



Data source: 2024 ACS PUMS.

2027 Housing Policy Forum

Less Than 30 Days Until Early Bird Registration Ends

By NLIHC Communications Team

Keywords: 2027 Housing Policy Forum, early bird registration

Early Bird Registration is now open for NLIHC's 2027 Housing Policy Forum: Building Our Future Together! Early Bird rates expire on December 1, 2026. Register today and take advantage of discounted member ticket prices.

Sarah Lewis, writer, art and cultural historian, will join award-winning author and journalist Ta-Nehisi Coates at the 2027 Housing Policy Forum.

Let us know you're looking forward to #Forum27 by following and tagging NLIHC on social media and using #Forum27 and #NLIHC27!

What You Should Know

Early Bird Registration: October 1, 2026, to December 1, 2026
General Sales: December 2, 2026, to February 2, 2027

Early Bird Registration Ticket Prices

Member: $650 (increases to $800 on December 2)
Non-Member: $750 (increases to $900 on December 2)
Low-Income Individuals: $125 (increases to $150 on December 2)

For questions about membership, please contact Lindsay Duvall, NLIHC Manager, Member Engagement, at membership@nlihc.org

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Event

Reimagining Interim Housing Project Releases New and Updated Resources – Attend November 17 Webinar to Learn More

By NLIHC Policy Team

Keywords: homelessness, Framework for an Equitable Homelessness Response, shelter, interim housing, resources, webinar, Reimagining Interim Housing, National Standards for Shelter and Interim Housing Programs

Shelter and interim housing programs play essential roles in keeping people safe and helping people connect to permanent housing. The Reimagining Interim Housing Project has developed the new National Standards for Shelter and Interim Housing Programs. The Standards—which were deeply informed by people with lived expertise, program staff, system leaders, and others—provide clear expectations that can be adapted and applied based on local circumstances to help provider organizations and communities improve people's experiences and strengthen the quality, safety, and effectiveness of programs. The project has also released updated publications to help communities and organizations reimagine approaches to sheltering people experiencing homelessness while also strengthening existing programs.

Access the Reimagining Interim Housing Project's new and updated resources.

Register here for a webinar on Tuesday, November 17, from 3:00 pm to 4:30 pm ET to learn more about these new National Standards.

NLIHC News

NLIHC in the News for the Week of October 26

The following are some of the news stories to which NLIHC contributed during the week of October 26:

- "New apartment community opens in Las Vegas for seniors on low or fixed incomes," *Homes.com*, October 27, at: https://tr.ee/FBxwZe
- "Two Cleveland Affordable Housing Projects Raise the Same Question — What Will Residents Actually Pay," *Hoodline*, October 29, at: https://tr.ee/rf6GEH
- "Airbnb pledges $500M for its nonprofit to offer more free emergency stays," *Associated Press*, October 29, at: https://tr.ee/1O4L02

Where to Find Us – November 2

- Housing Justice Network Conference – Atlanta, GA, November 9-11 (Sarah Abdelhadi and Renee Williams)
- Connecticut Affordable Housing Conference – virtual, November 17 (Nada Hussein)
- Dallas Housing Coalition Annual Housing Summit – Dallas, TX, November 20 (Sarah Abdelhadi)
- Housing Alliance of Pennsylvania's Homes Within Reach Conference – Hershey, PA, December 14-16 (Kim Johnson)

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