

NLIHC's HoUsed Campaign for Long-Term Housing Solutions

June 23, 2026

Welcome & Introductions



David Gonzalez Rice

Senior Vice President of Policy

National Low Income Housing Coalition

dgonzalez_rice@nlihc.org

Agenda



Welcome & Introductions

- David Gonzalez Rice, Senior Vice President for Policy, NLIHC

Proposed Changes to OMB's Uniform Guidance

- Sarah Saadian, Senior Vice President of Policy and Campaigns, National Council of Nonprofits

Impact of Proposed OMB Changes on HUD Grantees

- Deborah Thrope, Chief Program Officer, National Housing Law Project

Impact of Proposed OMB Changes on Voter Engagement

- Brian Miller, Executive Director, Nonprofit VOTE

Federal Policy Updates: 21st Century ROAD to Housing Act

- Libby O'Neill, Senior Policy Analyst, NLIHC; Noah Patton, Director of Disaster Recovery, NLIHC

Take Action

- Lindsay Duvall, Manager of Member Engagement, NLIHC

Proposed Changes to OMB's Uniform Guidance



Sarah Saadian

Senior Vice President of Policy & Campaigns

National Council of Nonprofits

ssaadian@councilofnonprofits.com

Oppose Sweeping Proposed Changes to Federal Grantmaking

June 2026

Sarah Saadian, SVP, National Council of Nonprofits

1.

Proposed Harmful Changes

Creates a new political process for selecting grantees

- Every administration could make significant changes to federal grants.
- Political appointees can exclude grant proposals if they are not consistent with “federal agency priorities and the national interest.”
- Grantees would not know whether and why their proposal was rejected, and they would be unable to appeal.
- Agencies can consider a grantee’s membership or affiliation with other organizations that “violate federal law” or related to “public safety or national security.”
- Agencies can consider grantees’ engagement in “activities or initiatives that are inconsistent with federal civil rights laws,” which could exclude grantees that work to advance racial equity.
- Agencies could terminate grants if subrecipients “damage the reputation” of the federal government.

Creates a constantly shifting environment to administer grants

- Agencies can terminate or suspend discretionary grants without cause.
- Agencies can add new terms and conditions mid-performance.
- When a grant is terminated under the agency's discretion, the agency would not have to provide grantees with a hearing or appeals process.
- Agencies could withhold federal discretionary grants indefinitely, if the grant does not "advance the president's policy priorities."

Threatens federal programs that address racial or social inequities

- Bars federal funding from being used to promote “unlawful” diversity, equity, and inclusion (DEI) efforts or illegal immigration.
- Purports to bar funding from being used to support disparate impact theory.

It is unclear what counts as “illegal” DEI. Many DEI-related practices and policies that the administration claims are unlawful have been upheld by courts as permissible under the law or can be administered lawfully.

Other Changes

- Prevents agencies from translating NOFOs and other documents into languages other than English, limiting opportunities for new grantees.
- Eliminates language encouraging agencies to ensure diversity in merit review process.
- Removes guidance that required engagement with community members impacted by federal programs.
- Removes hiring preferences and goals for people living in high-poverty areas or disadvantaged communities.

Other Changes

- Encourages agencies to work with third parties to file litigation against grantees under the False Claims Act – **taken together with proposed new certifications, this could lead to legal harassment.**
- Bars federal funding from being used to participate in voter engagement/registration, issue advocacy, or public messaging, creating a chilling effect on lawful activity.

2.

Impact on Grantees

Impact on Grantees

- Forces grantees to choose between applying for critical federal resources and their deeply held values and beliefs.
- Creates unpredictable financial, legal, and reputational risks that increase the costs of accepting federal awards.
- Deters participation in federal programs, harming the communities federal programs were intended to serve.
- Could lead to disruptions to essential services, harming the people and communities that rely on federal grantees to deliver essential services.

3.

Take Action

Take Action by July 13

1. **Submit a public comment using [NCN's comment guide](#)**
2. **[Sign the national letter](#) opposing the proposal**
3. **[Email your Members of Congress](#) and urge them to protect federal grantees and the communities they serve**

NCN Resources

Learn More

<https://www.councilofnonprofits.org/articles/take-action-july-13-oppose-sweeping-changes-federal-grantmaking>

Thank You

Impact of Proposed OMB Changes on HUD Grantees



Deborah Thrope

Chief Program Officer

National Housing Law Project

dthrope@nhlp.org

OMB Regulation for Federal Financial Assistance and HUD Housing Programs



June 23, 2026



Powered by the
National Housing Law Project

Join us!

Join a dedicated community of thousands of housing advocates and attorneys. We serve on the front lines to build tenant power and advance housing rights.

There is no cost to join or participate in the Housing Justice Network (HJN).



LEARN MORE AND SIGN UP TODAY:

www.nhlp.org/about/hjn

OMB Proposed Rule as Applied to HUD Housing Programs

- I. HUD procedural issues
- II. Conflicts with HUD housing statutes
- III. Vague terms – how do housing agencies comply?
- IV. Unfettered discretion to political appointees is bad for housing supply, preservation, and tenants' rights

- Impacts on HUD Housing providers and housing supply
- Impacts on Tenants
- Impacts on Affordable Housing Preservation

Comments due July 13!

Submit at www.regulations.gov

Resources:

- <https://www.councilofnonprofits.org/files/media/documents/2026/2026-chart-omb-uniform-proposed-changes.pdf>
- https://docs.google.com/document/d/1QzUBm1NF4iLhy_3pswcg_6J78qRzameT/edit
- <https://www.ropesgray.com/en/insights/alerts/2026/06/omb-proposed-revisions-to-the-uniform-guidance-key-takeaways-for-award-recipient-organizations>

Impact of Proposed OMB Changes on Voter Engagement



Brian Miller

Executive Director

Nonprofit VOTE

brian@nonprofitvote.org

Proposed new OMB Rule

Today's Purpose:

- Summarize what we know
- Identify potential impact
- Gather partner input
- Q&A and next steps

Office of Management and Budget (OMB) Rule

Key timeline

- Proposed rule issued: May 29, 2026
- Public comments due: July 13, 2026
- Final rule expected: September 1, 2026
- Effective date: October 1, 2026

Why it matters

The memo includes provisions that could affect federally funded **nonprofits and institutes of higher education** engaged in voter registration, issue advocacy, and public messaging.

Voter Registration Provision

Limits use of grant funds by nonprofits and institutions of higher education:

- Prohibits use of **federal grant dollars** for voter registration campaigns, drives, or related activities
- Does **not** appear to prohibit federal grantees from doing voter registration with **non-federal funds**
- Could still create confusion and discourage lawful nonpartisan voter engagement

Core concern

Even if the legal restriction is limited to federal dollars, many nonprofits may incorrectly hear: **“If we receive federal funding, we cannot do voter registration.”**

Issue Advocacy Provision

Limits use of grant funds by nonprofits and institutions of higher education (IHE):

- Expands restrictions beyond lobbying
- Could restrict use of federal funds for broader “issue advocacy” or public messaging
- Uses terms that may be broad or subjective

Potential effect

Nonprofits and IHEs may become more cautious about advocacy, education, or public communications that are otherwise lawful and mission-aligned.

Potential Scale of Impact

Known or estimated scope

- More than **100,000 nonprofits** receive federal grants or contracts
- About **20%** of nonprofits conduct voter registration or GOTV work
- Estimate: **20,000–30,000 nonprofits** could be affected or chilled
- Most if not all **institutes of higher education (IHEs)** also receive grants

Unknown

How many nonprofits or IHEs use federal funds to pay for voter registration activity.

Likely issue

The direct legal impact may be smaller than the practical chilling effect.

Why Timing is Especially Problematic

Final rule timing overlaps peak election activity

- Final rule expected **September 1**
- National Voter Registration Day is on **September 15**
- Effective date is **October 1**
- State registration deadlines vary from **October 4 to Election Day itself**
- Election Day is **November 3**

Risk

Organizations may halt voter registration drives while awaiting legal review of new rule — and by the time they get clarity, the election may be over.

Conflicts with Natl. Voter Registration Act

The National Voter Registration Act (NVRA) of 1993 requires certain federally supported agencies to proactively offer an opportunity to register to vote.

Nonprofits that are subject to the NVRA include those that:

- Administer public assistance programs like SNAP, WIC, TANF, Medicaid program, and SCHIP
- Administer state-funded programs for people with disabilities

Institutes of higher education subject to NVRA when administering state-funded programs for people with disabilities

Key Legal and Policy Concerns

Potential problems with the rule:

- Creates confusion close to an election
- Adds administrative burden without clear benefit
- May exceed administrative authority
- Likely conflicts with the National Voter Registration Act

Nonprofit VOTE Response

Current and planned actions

- Encouraging partners to submit public comments before July 13
- Using outreach as a chance to pre-educate nonprofits:
 - Federal funds may be restricted
 - Non-federal funds can still support lawful nonpartisan voter registration
- Preparing Nonprofit VOTE's own comments
- Considering additional strategies beyond comments

What Would be a Win?

Best outcome

- Fully block the voter registration provision from taking effect

Damage-reduction outcomes

- Delay effective date until after the November election
- Keep compliance light and simple, not overly burdensome
- Add clear language affirming that nonprofits may use non-federal funds for lawful voter registration
- Clarify treatment of nonprofits covered by the NVRA

Federal Policy Updates: The 21st Century ROAD to Housing Act



Libby O'Neill

Senior Policy Analyst

National Low Income Housing Coalition

elloneill@nlihc.org

Noah Patton

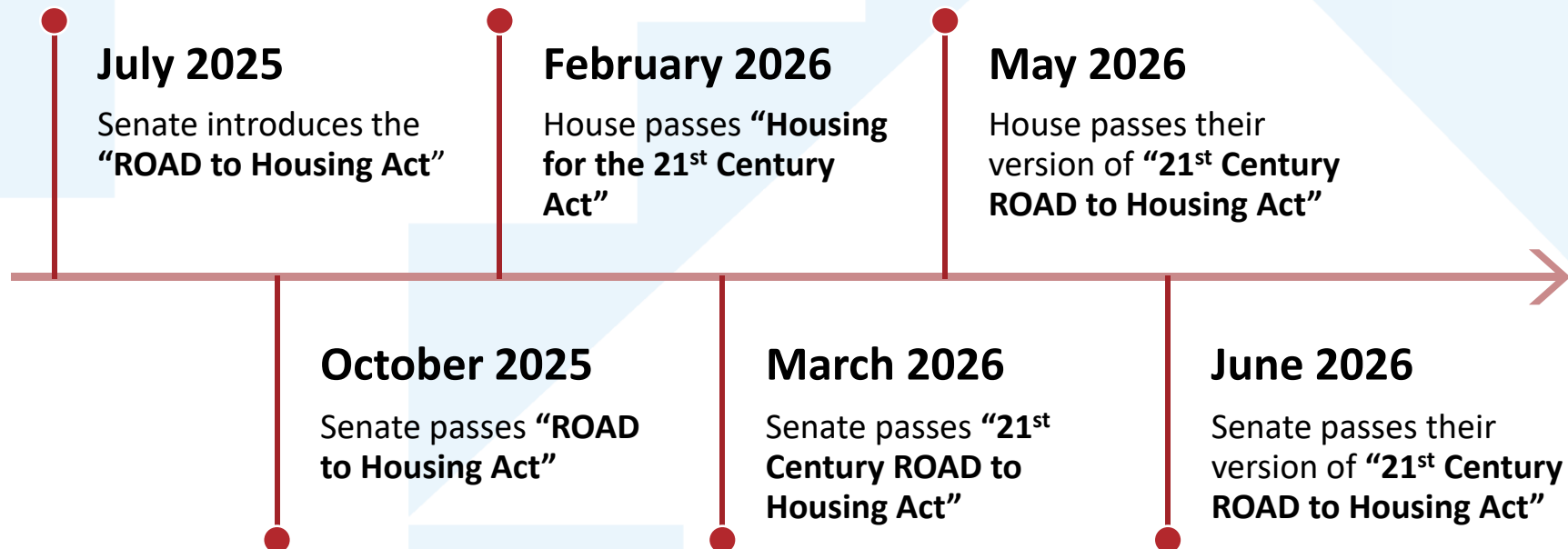
Director of Disaster Recovery

National Low Income Housing Coalition

npatton@nlihc.org

Background on the Bill

The House and Senate have been introducing and passing **different versions** of a broad, **bipartisan** housing package over the last 12 months.



But then, last week...



- The House and Senate announced that they had reached an agreement on a final bill.
- The Senate passed the bill yesterday (June 22) with a vote of 85-5.
- Next steps:
 - The bill will go to the House for a vote tonight.
 - If the House passes the bill, it will go to the president's desk to be signed into law.

What's in the bill?



- **59** provisions. Areas included:
 - Disaster recovery
 - Rural housing preservation
 - Program reform and streamlining
 - Veteran's housing reforms
 - Manufactured housing preservation and reforms
 - Planning and development funding
 - Oversight, accountability, studies
 - Community bank reform
 - Restrictions on institutional investors

NLIHC's Priorities (and other good stuff)



- **Reforming Disaster Recovery Act**
- **Rural Housing Service Reform Act**
- **Provisions from Choice in Affordable Housing Act**

- Whole-Home Repairs Act
- Housing Supply Expansion Act
- PRICE Act
- Innovation Fund
- RESIDE Act
- Incentivizing Local Solutions to Homelessness Act
- Housing Unhoused Disabled Veterans Act
- HOME Reauthorization and Reform Act
- Temperatures Sensor Pilot
- Helping More Families Save Act
- Small Dollar Mortgage Pilot

Reforming Disaster Recovery Act



- Authorizes HUD's Community Development Block Grant – Disaster Recovery (CDBG-DR) program for three years
- The CDBG-DR program provides flexible grants to help presidentially declared disaster areas recover and better prepare by...
 - Rebuild affordable housing and other infrastructure
 - Distribute rental assistance
 - Carry out mitigation and resilience activities
 - Aid in economic development
 - And much more!
- Congress has initially authorized the CDBG-DR program for three years. Ideally, the program should be authorized permanently to ensure efficiency, reduce unnecessary bureaucracy, and deliver aid quickly to disaster survivors

RDRA: Why Auth Matters



- In its simplest form, authorization means "make permanent for X amount of time"
- Although the CDBG-DR program is the only source of long-term recovery and preparedness funds from the fed gov, it's never been authorized
- Authorization is important because it allows a program to get regular funding and carry out its functions across time
- Prior to authorization, Congress – on no regular, consistent timeline – put funds into the CDBG-DR program, forcing HUD to also rewrite the rules each time -> disaster survivors fall through the cracks
- Authorization allows Congress to put funds into the program on a yearly basis and HUD to create permanent rules -> speeding up the flow of funds to disaster survivors

RDRA: Then vs. Now



- These changes will help families impacted by presidentially declared disaster with their long-term recovery and preparedness
 - Establish an Office of Disaster Management and Resiliency at HUD
 - Spend funds proportionately between renters and homeowners
 - Distribute funds equally between housing and infrastructure
 - Ensure 70% of funds benefit low-to-moderate (LMI) income households
 - Prioritize activities that help LMI survivors recover, address pre- and post-disaster housing needs, and prepare for future disasters
 - Establish concrete deadlines for funding distribution
 - Allow for increased transparency and oversight into the program

RDRA: Funding 101



- For the CDBG-DR program, there are two parts to the funding equation
 - The overall amount of money Congress will decide to put into the program for the year (AKA the total amount of money available)
 - The funding allocation formula HUD will develop (AKA how to split the total money between all impacted communities for the year)
- Congress' responsibility
 - Money will be put into the CDBG-DR program, like all fed discretionary programs, through the yearly appropriations process
 - Discretionary spending means funding is determined by Congress every year through the appropriations process – rather than through mandatory spending – meaning a law determines how much money a particular program gets until that law is changed
 - Every fiscal year Congress has to pass 12 appropriations bills that fund the government and keep it running – one being the THUD bill
- HUD's responsibility
 - HUD will pass a final rule that creates the specific formula that divides the total amount of money amongst states, territories, and tribes that experience presidentially declared disasters each year

RDRA: What's Next?



- This is a monumental win AND we know the job isn't finished yet!
- Next, we'll be focused on...
 - Ensuring HUD creates a final rule that establishes a more efficient and equitable CDBG-DR program
 - Working with Congress to allocate sufficient funding to the CDBG-DR program
- Join us! The DHRC Working Group meets every other Wed at 2 pm EST

Rural Housing Service Reform Act



Many pieces, including:

- “Decoupling” or separating mortgages from rental assistance. This means when a mortgage on a rental property matures, the rental assistance can continue
- Providing capacity building grants for rural areas
- Increasing the maximum grant amount for Section 504 – repair grants and loans for low-income rural homeowners – to \$15,000

Choice in Affordable Housing Act



- Makes changes to the inspection rules for units being rented by someone with a Housing Choice Voucher
 - Allows for “pre-inspection” of units
 - Allows inspections for other housing assistance programs to fulfill the requirement for the Housing Choice Voucher
 - If the unit is in a rural or remote area, a video inspection is allowed

What's *Not* in the Bill?



- **Funding is limited** to a few pilot programs. Innovation Fund and RESIDE Act have mixed-income (60% AMI – 120% AMI) requirements
- No funding to develop or preserve supply for extremely low-income renters
- No funding for housing choice vouchers
- No funding for public housing
- No streamlining or reforms for homelessness programs

Next Steps



- NLIHC will be releasing a new resource once the bill (hopefully) passes, explaining more details on the bill's impact for low-income households.
- Learn more about the bill from the Senate Banking Committee's "Section-by-Section"
 - [https://www.banking.senate.gov/imo/media/doc/section-by-section for the 21st century road to housing act.pdf](https://www.banking.senate.gov/imo/media/doc/section-by-section%20for%20the%2021st%20century%20road%20to%20housing%20act.pdf)

Take Action



Lindsay Duvall

Manager of Member Engagement

National Low Income Housing Coalition

lduvall@nlihc.org

Resources & Next Steps



- **Contact** your members of Congress: <https://nlihc.quorum.us/campaign/157066/>
- **Become a member** of NLIHC: www.nlihc.org/membership
- **Connect** to your Field Team member: outreach@nlihc.org

**Join our next National HoUsed Campaign Call:
Tuesday, July 14 at 4:00 -5:00 pm ET**