

United States Senate

WASHINGTON, DC 20510

[[DATE]]

The Honorable Scott Turner
Secretary
U.S. Department of Housing and Urban Development
451 7th Street S.W.
Washington, D.C. 20410

Dear Secretary Turner:

We write to you today regarding recent reports that the Department of Housing and Urban Development (HUD) intends to issue a new fiscal year 2025 Continuum of Care (CoC) Notice of Funding Opportunity (NOFO) and make substantial changes to how funds are awarded. HUD must immediately reconsider these harmful and potentially illegal changes that could result in nearly 200,000 older adults, chronically homeless Americans with disabilities, veterans, and families being forced back onto the streets. As Secretary, you have the authority to avoid this worst-case scenario by carrying out the previously planned and Congressionally authorized two-year NOFO¹, and we strongly urge you to do so expeditiously.

The Continuum of Care program is the largest source of Federal grant funds for providing a wide-range of housing and services for individuals experiencing or at risk of homelessness that are responsive to local community needs. On September 29, 2025, Politico reported that the Department intends to make wholesale changes to the fiscal year 2025 CoC NOFO.² The most troubling of these changes is a new, arbitrary cap on the amount of funds that may be used for permanent housing. Currently, 87 percent of CoC funds support permanent housing, but the new NOFO reportedly limits the amount of funding for permanent housing to only 30 percent. This appears to be in contravention of the McKinney-Vento Homeless Assistance Act³, undermines

¹ Section 242 of the Consolidated Appropriations Act, 2024 (Public Law 118-42) provided: “For fiscal years 2024 and 2025, the Secretary may issue a 2-year notification of funding opportunity, including any alternative procedures or requirements as may be necessary to allocate future appropriations in the second year, for the award of amounts made available for the continuum of care program under subtitle C of title IV of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11381 et seq.), notwithstanding any conflict with the requirements of the continuum of care program.”

² Hapgood, Katherine. “Trump admin looks at deep cuts to homeless housing program.” *Politico*, September 29, 2025. <https://www.politico.com/news/2025/09/29/trump-admin-looks-at-deep-cuts-to-homeless-housing-program-00585770?nid=0000014f-1646-d88f-a1cf-5f46b7bd0000&nname=playbook&nrid=029a6cb0-ce47-467b-b7ef-0a38ceb899fd>.

³ 42 U.S.C. § 11381 et seq.

local decision-making authority, and ignores decades of research that has proven that permanent supportive housing and rapid rehousing are less costly and more likely to be successful in providing long-term stability than other strategies, particularly for chronically homeless people and families. Today, CoC funds serve over 750,000 Americans experiencing homelessness each year, and every community will feel the impact of this dramatic cut. The cut will be largest for major cities in absolute terms, but rural communities—who experienced a 12 percent increase in homelessness between 2023 and 2024⁴ and are more reliant on Federal funding—are likely to feel the impacts most severely⁵.

In your written testimony for the June 2025 Senate Appropriations Committee hearing on HUD’s fiscal year 2026 budget request, you stated that your budget aimed to “better serve the American people while maintaining necessary assistance for the elderly and disabled.”⁶ However, seniors are the fastest-growing demographic among people experiencing homelessness. The share of the homeless population aged 60 years and older in 2020 was 2.6 times higher than it was in 1990.⁷ By dramatically cutting funding for permanent housing, tens of thousands of older adults and people with disabilities who currently reside in CoC funded permanent supportive housing could soon lose their homes and lose access to the supportive services they need to take care of their physical and mental health needs.

Each new administration can make policy changes when they take office. While we may not always agree on those policy changes, we should never have to question whether agency officials will faithfully follow the law and work to minimize harm to our constituents and communities when implementing those new policies. Reports of HUD intentionally blocking staff from examining the legality of the fiscal year 2025 NOFO changes with its own attorneys are deeply troubling. We are also concerned by HUD’s lack of communication with grantees, especially as any new NOFO at this point in the year would not provide grantees with adequate time or opportunity to plan for sweeping changes before some projects begin to run out of CoC funds in January 2026. Further, HUD has taken several steps since January 20, 2025 to spark chaos and disrupt grantee operations, including applying new and likely illegal conditions to previously awarded CoC grants⁸, repeatedly recompeting the fiscal year 2023 CoC Builds funding⁹,

⁴ HUD. “The 2024 Annual Homelessness Assessment Report (AHAR) to Congress”. December 2024. <https://www.huduser.gov/portal/sites/default/files/pdf/2024-AHAR-Part-1.pdf>

⁵ National Alliance to End Homelessness. “Visualizing the Impact of the Presidents’ FY2026 Budget: Returns to Homelessness and Major Setbacks Could Be Ahead”. June 3, 2025. <https://endhomelessness.org/resources/research-and-analysis/visualizing-the-impacts-of-the-presidents-fy2026-budget-returns-to-homelessness-and-major-setbacks-could-be-ahead/>

⁶ Turner, E. Scott. Statement Before the Committee on Appropriations, Subcommittee on Transportation, Housing and Urban Development, and Related Agencies. June 11, 2025. https://www.appropriations.senate.gov/imo/media/doc/secretary_scott_turner_testimony.pdf.

⁷ Byrne, Thomas. “Persistence of a Birth Cohort Effect in the US Among the Adult Homeless Population.” December 26, 2024. <https://jamanetwork.com/journals/jamanetworkopen/fullarticle/2828494>

⁸ King County v. Turner (2:25-cv-00814)

⁹ National Alliance to End Homelessness v. Turner (1:25-cv-00447)

proposing to eliminate the CoC program altogether¹⁰, repeating rhetoric used by the President to villainize homeless people, and gutting the HUD workforce that implements the CoC and other community development programs¹¹. All these actions raise serious questions and concerns about whether HUD is intentionally violating the law to prevent Congressionally appropriated funds from reaching the people and communities they were intended to support.

For months, we have heard from countless front-line workers, faith-based and non-profit service providers, mayors, and governors who have been frantically attempting to navigate HUD's actions and anxiously waiting for HUD to provide details around the fiscal year 2025 NOFO changes. For months, our staffs have sent HUD countless questions about its intents and actions around CoC funding that have remained unanswered, undermining Congress's ability to carry out its legislative and oversight functions. Real people in every community across the country rely on these funds to address homelessness. The funding competition process for fiscal year 2025 has not begun, and with CoC project awards beginning to expire in just three months, HUD is simply out of time.

There is a better way forward. Congress already authorized HUD to compete CoC funds on a two-year basis for fiscal years 2024 and 2025, and communities already went through a two-year planning process. The shift to a two-year funding cycle had strong bipartisan support and aimed to reduce the burden on communities and provide greater predictability of funding. HUD should make the responsible choice to renew current CoC grants, proactively work with communities to promote other proven strategies "based on research and after notice and public comment"¹², and work to ensure any policy changes meet all legal requirements to avoid more funding delays.

HUD's current path risks causing a dangerous spike in street homelessness and creating chaos in urban, suburban, and rural communities alike by forcing nearly 200,000 chronically homeless Americans with disabilities and families back onto the streets. We implore you to make the better choice and expeditiously renew current CoC grants for fiscal year 2025 as authorized by Congress to protect communities and avoid displacing thousands of our nation's most vulnerable individuals.

Thank you for your attention to this matter.

[[CLOSING]]

¹⁰ HUD. "Congressional Justifications for the FY2026 Budget, Office of Community Planning and Development – Homeless Assistance – Emergency Solutions Grants." https://www.hud.gov/sites/dfiles/CFO/documents/2026_CJ_Program_HAG.pdf.

¹¹ According to data provided to the House and Senate Committees on Appropriations, the Office of Community Planning and Development lost 37 percent of its workforce between January 2025 and June 2025.

¹² 42 U.S.C. 11386b (d)(2).

[[SIGNATURES]]