

NAHMA Washington
Update:
September 2025



Agenda

- Context for Our Discussion: Market Trends
- Congress
 - FY 2025 Appropriations
 - FY 2026 Appropriations and Budget Resolution Process
 - Legislation & Hearings, Nominations
- Administration
 - Executive Orders, Trade/Tariffs
 - DOGE, HUD, Fair Housing
 - Tax Credit (LIHTC)
 - Rural Housing
- Advocacy Resources

Market Trends

- Harvard JCHS – (Report); 2025 The State of The Nation's Housing
- Summary
 - The U.S. housing market is shrouded in uncertainty.
 - Insurance premiums and property taxes are on the rise;
 - High rents have left record numbers with cost burdens;
 - Devastating wildfires have highlighted the growing dangers of climate disasters.

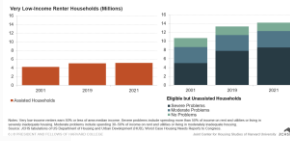


Market Trends

Figure 3: Renter Household Growth Outpaces the Surge in Apartment Construction



Figure 5: Housing Assistance Fails to Keep Up with Increasing Needs



Market Trends

Figure 22: Lower-Income Renters Have Experienced a Sharp Drop in Funds Left Over After Paying for Housing

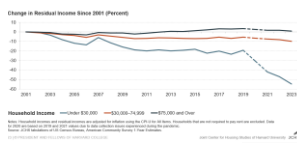
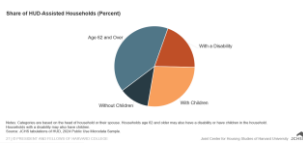


Figure 26: Most Assisted Households Are Older, or Include Children or People with Disabilities



Market Trends

Figure 28: Climate-Related Disasters Are More Frequent and More Costly

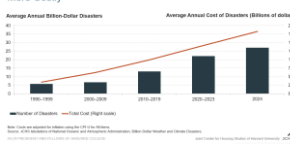
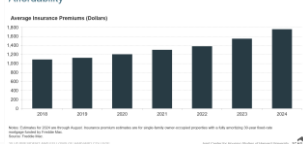


Figure 29: Rising Insurance Premiums Further Strain Affordability

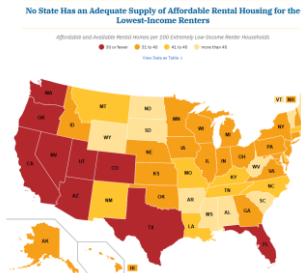


Market Trends

➤ NLHC: The Gap - A Shortage of Affordable Homes

▪ National Shortage of Affordable Rental Housing

▪ "The U.S. has a shortage of 7.1 million rental homes affordable and available to renters with extremely low incomes – that is, incomes at or below either the federal poverty guideline or 30% of their area median income, whichever is greater. Only 35 affordable and available rental homes exist for every 100 extremely low-income renter households."



Market Trends

United States Federal Rental Assistance Fact Sheet

Center on Budget and Policy Priorities

Federal rental assistance helps struggling seniors, people with disabilities, veterans, and working families keep a roof over their heads, often by helping them afford rental units they find in the private market. Ten million people in over 5 million low-income households receive federal rental assistance.

10.1 million

people in 5.2 million American households use federal rental assistance to afford modest housing.

69% are seniors, children, or people with disabilities.



Rental assistance helps 2.1 million of the United States' senior-most high-income households.

Rental assistance helps 2.6 million people with disabilities who live independently in the United States.

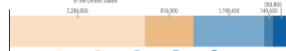
Rental assistance helps 5.6 million people in families with children in the United States avoid homelessness.

Rental assistance supports working families: 60% of non-disabled, working-age American households receiving Department of Housing and Urban Development rental assistance include at least one worker.

Rental Assistance Supports All Types of American Communities

Rental assistance helps 6.6 million people in cities and suburbs, as well as 1.5 million people in rural areas and small towns.

Number of Households Receiving Major Types of Federal Rental Assistance in the United States



Federal rental assistance programs provided states with \$55 billion in 2023.

FY25 Govt Funding

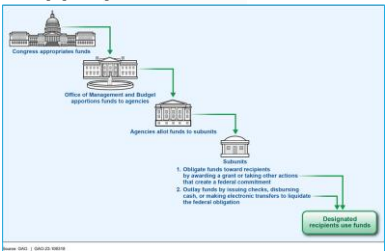
Congress [Passes Government Funding Bill](#) in mid-March -- Highlights the seven-month funding legislation, including FY24 levels for most HUD programs with changes:

- \$32.04 billion for Section 8 tenant-based rental assistance, with \$32.15 billion (including previous appropriations) allocated for voucher renewals
- \$16.49 billion for PBRA
- \$931 million for Section 202
- \$257 million for Section 811

FY26 Status of
Funding Bills

- **Appropriations Status Table: FY2026**
- **Agriculture (USDA-RD):** Committee Approval in House and Senate; Awaiting Full House and Senate Vote
- **THUD:** Committee Approval in House and Senate; Awaiting Full House and Senate Vote

Federal Appropriations Process



HUD Funding
Chart
FY25 vs FY26

HUD Programs (in millions)	FY25 Enacted (current)	FY26 President Budget Request	FY26 House Proposed	FY26 Senate Proposed
HOME	\$1,250	0	0	\$1,250
CDBG	\$3,330	0	\$3,300	\$3,100
PBRA	\$16,890	0*	\$17,127	\$17,804
Sec. 202	\$931	0*	\$950	\$972
Sec. 811	\$256	0*	\$261	\$265
TBRA (HCV)	\$36,048	0*	\$35,268	\$37,355

* Administration proposed elimination and consolidating into State Rental Assistance Block Grant program

USDA-RD/RHS
Funding Chart
FY25 vs FY26

USDA-RD Programs (in millions)	FY25 Enacted (current)	FY26 President Budget Request	FY26 House Proposed	FY26 Senate Proposed
Section 515	\$60	\$50	\$60	\$50
Section 521	\$1,608	\$1,720	\$1,715	\$1,715
Section 538	\$400	\$400	\$400	\$400
Section 542	\$48	\$48	\$48	\$48
Rental Preservation Demonstration (MPR)	\$34	\$15	\$30	\$34

FY26 Govt Funding (Appropriations)
FY2026 HUD Budget: Major Restructuring

Total HUD Budget Requested: \$43.5 billion (↓ 43.6% from FY2025)

- HUD's FY2026 budget request proposes significant cuts across federal agencies and programs.
- On May 2, the White House pushed a "skinny budget" with a focus on reducing the footprint of government and its reach into Americans' lives, potentially leading to a decrease in the number of households receiving housing assistance.

FY26 Govt Funding (Appropriations)
FY2026 HUD Budget: Major Restructuring

- Key Change:** New State Rental Assistance Block Grant
- Consolidates public housing, tenant-based, project-based, elderly & disability programs (↓ \$26.7B)
 - Two-year assistance cap for able-bodied adults
 - Prioritizes elderly and disabled recipients
 - Formula relies on state-matching resources
 - **Administration's Rationale:** States better equipped to address local housing needs

FY26 Govt Funding (Appropriations) Major Program Eliminations & Consolidations

Key Change: Major Program Eliminations & Consolidations

- Community Development:
 - CDBG eliminated (\$3.3B)
 - HOME Investment Partnerships eliminated (\$1.25B)
- Homelessness Programs:
 - Homeless Assistance Grants Consolidated into Emergency Solutions Grants (\$532M)
 - Two-year assistance cap
 - U.S. Interagency Council on Homelessness eliminated
- Other Program Eliminations:
 - PRO Housing Grants (\$100M)
 - Fair Housing Initiatives Program
 - RD/Rural housing programs cut by \$721M

HUD Secretary Turner Gets Pushback From Lawmakers on HUD Funding Request

- Context: HUD Secretary Scott Turner faced intense bipartisan congressional scrutiny over the administration's proposed FY 2026 budget.
- Proposed Cuts: A drastic 51% reduction to HUD's budget and sweeping programmatic changes, fundamentally reshaping federal housing assistance.
- Administration's "New Playbook": Secretary Turner advocates for efficiency and fiscal responsibility, characterizing current programs as "full of waste, fraud, and abuse" and "broken."
- Key Remark: Rental assistance as a "trampoline, not a hammock" – temporary, not permanent. Despite HUD's budget increasing from \$42 billion to \$77 billion over eight years, homelessness increased 18% in 2024 to over 770,000 people.

Major Program Consolidation: A Paradigm Shift

- Core Proposal: Consolidating five major rental assistance programs into a single State Rental Assistance Program (SRAP) block grant:
- HCV, PBRA, Public Housing, Section 202, Section 811
- Impact: Affects over 4.5 million households, primarily elderly and disabled.
- Rationale: To give states "skin in the game" and allow them to address unique local needs.
- Congressional Concern: Lack of specific details on implementation, funding formulas, and protections for vulnerable populations.

FY26 Rural Housing
Funding & Challenges

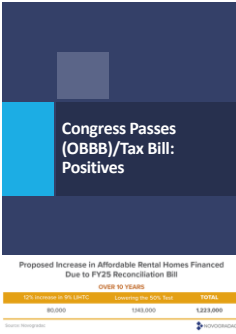
- **House Subcommittee Hearing on Rural Housing Needs:**
 - **Challenges:** Aging housing stock (**28-36% of homes built pre-1940**), higher construction costs, limited contractors, **44% of rural renters cost-burdened (half severely)**.
 - **Systemic Issues:** Federal policies (e.g., mortgage interest deduction, GSEs) steer investment away from rural areas.
 - **Regulatory Burdens:** Environmental review, Build America Buy America, Davis-Bacon, Section 3 add **20-40% to construction costs**.
 - **Section 515 Mortgage Maturities:** **75% of Section 515 mortgages mature over next decade**, potentially displacing **250,000 families** unless rental assistance is decoupled.

Senate FY26 USDA
Appropriations Bill:
Stronger Support for
Rural Housing

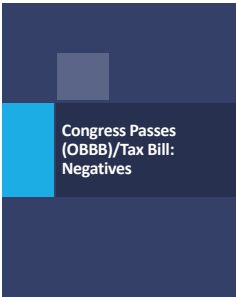
- On July 10, the **Senate Appropriations Committee** approved the FY26 Agriculture, Rural Development, FDA, and Related Agencies Appropriations Act (**S.2256**), which contains more favorable funding levels for the **USDA Rural Housing Service (RHS)** compared to the House version.
- **Key Funding Levels**
 - **Section 521 Rental Assistance:** \$1.715 billion, equal to both the House and President's Budget Request, sufficient to **renew all existing contracts**.
 - **Multi-Family Preservation & Revitalization (MPR):** \$34 million, above the House level but below FY25.
 - **Section 538 Guaranteed Loans:** \$400 million, equal to House and White House levels.
 - **Section 515 Rural Rental Housing:** \$50 million, lower than House but consistent with the Administration's request.
 - **Policy Continuity: Decoupling Pilot Expansion**
- The Senate bill also expands the **decoupling pilot program** created in FY24: Allows USDA-assisted properties with maturing mortgages to **retain project-based rental assistance** via stand-alone contracts. Increases eligibility from **1,000 to 5,000 units**, addressing one of the most urgent preservation threats facing the rural affordable housing stock.

FY26 Govt
Funding

- Congress looking to avoid Govt. shutdown; current debate/disagreements:
 - **House** proposing a 7-week CR
 - **Senators** working on longer CR through holiday season to finish full-year funding package
 - **Administration** requested a CR into early 2026 (only one HUD adjustment included = shifting \$5 for HCV set-asides to broader TBRA account); opposition to this option
 - CR passage will be come down to bipartisan support. For their support/vote, Democrats have asked for an extension of Affordable Care Act subsidies set to expire at the end of this year; appears to be bipartisan support. Additional funding for lawmakers' security maybe added.



- **One Big Beautiful Bill (OBBB)**; Signed into law on July 4th
- **Strengthened Low-Income Housing Tax Credit (LIHTC)**
 - Permanently increases LIHTC state allocations by 12%.
 - Reduces Private Activity Bond test from 50% to 25%.
 - NCSHA Tracking their Members (HFAs) Implementation - [State Policies on New 25% Bond Financing Threshold](#)
 - Adds capacity for 1.22 million new affordable rental homes over 10 years.
- **Corporate Tax Rate remains at 21%**
- **No Federal Income Tax on Tips and Overtime up to \$25,000** (phases out by income, FICA taxes still apply. Ends in 2029)
- **Permanent Extension of Section 199A Pass-Through Deduction**
- **Bonus Depreciation Fully Restored**
 - Reinstates and permanently extends 100% expensing (effective Jan. 20, 2025).
 - Covers leasehold improvements, systems, appliances, lighting, and solar panels.
 - Supports rental housing reinvestment and upgrades.
 - Expected to boost GDP by 0.6% and add 145,000 jobs.
- **Opportunity Zones (OZ) Modernized and Expanded**
- **Permanent New Markets Tax Credit (NMTC)**



- **One Big Beautiful Bill (OBBB)**; Signed into law on July 4th
- **Changes to Clean Energy Tax Credits; Solar & Energy Credits being phased out**
 - Section 48E: Projects must begin within 12 months or be placed in service by 2027.
 - Section 179D: Projects must begin by June 30, 2026.
 - Section 45L: Expires June 30, 2026.
 - Scales back IRA energy incentives but maintains eligibility for current projects.
- **Electric Vehicle Credits Eliminated** after September 30, 2025
- **Congressional Budget Office (CBO)** projects the law will increase the number of people without insurance by 10 million in 2034; and
- **Increase the budget deficit by \$3.4 trillion** over the 2025-2034



- The Affordable Housing Credit Improvement Act** was reintroduced in both the House and Senate in April 2025. The bill has significant bipartisan support in both chambers. In the Senate: 30 total cosponsors including leads (15 Republicans and 15 Democrats); 59 percent of Finance Committee members. In the House: 131 total cosponsors including leads (66 Republicans and 65 Democrats); 67 percent of Ways and Means Committee members.
- **Key Provisions of the AHICIA:**
 - **Increased Credit Allocations:** The bill proposes increasing the number of Low-Income Housing Tax Credits available to states by 50% for the next two years.
 - **Permanent Increase:** It seeks to make permanent the temporary 12.5% increase in tax credits secured in 2018.
 - **Reduced Bond Requirements:** The bill aims to reduce the amount of private activity bonds needed to secure Housing Credit funding from 50% to 25%.
 - **Improved Program Implementation:** The AHICIA also includes provisions to improve the LIHTC program, such as addressing the needs of veterans, victims of domestic violence, and those in rural areas
 - **September 2025 Monthly Newsletter:** AHICIA Advocacy Strategies & Other Housing Credit News – ACTION Campaign

Legislation & Hearings

Recent Legislation Introduced:

- [Respect State Housing Laws Act](#), (S. 470/H.R. 1078) federal legislation that would end the CARES Act notice to vacate requirement.
- **Renewing Opportunity in the American Dream (ROAD) to Housing Act of 2025**
 - Senators Scott, Warren Announce Landmark Bipartisan Housing Legislation
 - The "ROAD to Housing Act" (Renewing Opportunity in the American Dream) is structured around four core pillars:
 1. Expanding and preserving housing supply
 2. Improving housing affordability and access
 3. Advancing accountability and fiscal responsibility
 4. Improving oversight and program integrity
 - **Unanimous Committee Passage:** The bill was unanimously approved by the Senate Banking Committee on July 29. The first markup on housing in 17 years.
 - **NAHMA's Advocacy:** We are actively engaging lawmakers, providing input, and advocating for both bill's swift passage.
 - **Additional Information:** [Markup Recording](#); [Section-by-section summary](#); [Legislative text](#)

Legislation & Hearings

Renewing Opportunity in the American Dream (ROAD) to Housing Act of 2025

- **Key Provisions & Benefits:**
 - **Section 201 (RAD):** Lifts the cap on the Rental Assistance Demonstration (RAD) program and codifies tenant protections, allowing more properties to leverage private capital for renovations.
 - **Section 203 (Housing Supply Frameworks Act):** Directs HUD to develop best practice frameworks to tackle restrictive zoning and local NIMBYism.
 - **Section 208 (Streamlined Reviews Act):** Aims to "right-size" NEPA reviews for small and infill projects, accelerating timelines and reducing costs for our members.
 - **Section 206 (Build Now Act):** Links CDBG funding to increased housing supply, incentivizing local governments to partner with us.
 - **Section 501 (Disaster Recovery Act):** Permanently authorizes CDBG-DR and creates a new Office of Disaster Management, providing long-term certainty for communities.
 - **Section 502 (HOME Reauthorization):** Reauthorizes the HOME program and proposes critical updates to improve its administration.
 - **Section 503 (Rural Housing Service Reform Act):** Decouples rental assistance from maturing mortgages to preserve rural affordable housing.
 - **Section 405 (Choice in Affordable Housing Act):** Seeks to reduce HUD inspection delays by allowing units financed through other federal housing programs to automatically satisfy voucher inspection requirements.

Legislation & Hearings

Recent Legislation Introduced:

- Senator Adam Schiff (D-CA) recently introduced the Incorporating National Support for Unprecedented Risks and Emergencies (INSURE) Act ([S. 2349](#)). This legislation aims to create a federal catastrophic reinsurance program within the Department of the Treasury to cap insurance company liability during major disasters. The bill is co-sponsored by Senator Mazie Hirono (D-HI) and has companion legislation in the House.
- By offering a federally priced alternative to the private reinsurance market, the INSURE Act seeks to stabilize rates and ensure that homes remain insurable. While a welcome potential solution for many, it faces opposition from some insurance trade groups who argue it misdiagnoses the problem and could incentivize living in high-risk areas.

Congress/Legislation

- **Sept. 2nd** - NAHMA joins [Industry Coalition Letter](#) to Congress Advocating for solutions to housing crisis
 - **HOME Program Reforms:** Reauthorization legislation would streamline inspections, authorize \$5B in funding, and increase flexibility for small-scale housing.
 - **Rural Housing Service Reform Act:** Targeted tools to preserve affordable housing in rural areas, backed by bipartisan support.
 - **Regulatory Modernization:** Measures like the Identifying Regulatory Barriers to Housing Supply Act and the HOME Reform Act would eliminate discriminatory land use policies and reduce burdensome environmental review timelines.
 - **New Financing Tools:** The coalition backs tax incentives like the Neighborhood Homes Investment Act and Workforce Housing Tax Credit, and calls for modernization of Transportation Infrastructure Finance and Innovation Act (TIFIA) lending to support housing near transit.
 - **Voucher Innovations:** A proposed pilot would convert Housing Choice Vouchers into electronic benefits (EBT), reducing fraud and landlord friction while preserving participant choice.

Executive Orders

Executive Orders And Actions

Housing Affordability, Immigration, Energy, Federal Workforce (RTO, Ending DEI, Hiring Freeze, Reduction); Regulatory Freeze And Review; Ending CDFIs And the Interagency On Homelessness; Homelessness (*Lawsuits Challenging a Range of EOs And DOGE Actions*);

Trade/Tariffs

Early April: President announced 10% Tariffs on all countries and steeper reciprocal levies on goods from other nations, including Europe, Japan and China. Trade negotiations continue

July 2025: New Reciprocal Tariffs and the Elimination of the De Minimis Exemption: modified "reciprocal" tariffs on most countries, with updated duties ranging from 10% to 41%.

Increased Costs Are Risk To Industry and Consumers (Lumber, Steel, Aluminum, and Imported Supplies)

Executive Order on Ending Crime and Disorder on America's Streets (Homelessness EO)

Executive Orders And Actions

- **Core Policy Shift:**
 - From "Housing First" to Enforcement: Moves away from the long-standing "Housing First" model (housing without preconditions) towards a focus on public safety, civil commitment, and mandatory treatment
- **Emphasis on Involuntary Treatment:** Directs federal agencies (HUD, DOJ, HHS, DOT) to support civil commitment and institutional treatment for unsheltered individuals with serious mental illness or substance use disorder who are unable to care for themselves.
- **Grant Prioritization:** Prioritizes federal grants to jurisdictions that actively enforce laws against: Open drug use, Unauthorized camping, Squatting
- **Implications for Affordable Housing & Vulnerable Populations:** Potential shifts in federal funding for programs and housing options, potentially affecting demand for certain affordable housing units previously supported by "Housing First" principles.
- **Local Enforcement Incentives:** Incentivizes municipalities to adopt more stringent measures against visible homelessness, potentially increasing law enforcement interaction rather than social service engagement.
- **Barriers to Assistance:** Mandating treatment participation as a condition for housing assistance could create new barriers for individuals, potentially perpetuating cycles of homelessness.
- **Resources:** White House [Factsheet](#) on the EO is available [HERE](#). The EO is available [HERE](#).



April 11 - [FR Notice](#) by the White House, Office of Management and Budget (OMB)

Summary: OMB seeks proposals to rescind or replace regulations that, "stifle American businesses and American ingenuity. We seek comment from the public on regulations that are unnecessary, unlawful, unduly burdensome, or unsound. Comments should address the background of the rule and the reasons for the proposed rescission, with particular attention to regulations that are inconsistent with statutory text or the Constitution, where costs exceed benefits, where the regulation is outdated or unnecessary, or where regulation is burdening American businesses in unforeseen ways."

Deadline was May 12, 2025.



- **Trump Administration Eying Housing Emergency Declaration**
- According to several media outlets ([FOX Business](#), and [Reuters](#)):
 - Administration may declare a national housing emergency this fall.
- Using the authority of the 1976 National Emergencies Act, the president has broad powers to bypass Congress and implement rapid policy measures
- Treasury Secretary Bessent indicated that the Administration is exploring: standardizing local building and zoning codes, reducing closing costs, and potentially waiving tariffs on critical construction materials to reduce development costs and stimulate supply. These actions would complement expected interest rate cuts from the Federal Reserve, which are aimed at easing pressure on the mortgage market.



1. HUD and DOI Announce [Joint Task Force To Use Federal Lands for Affordable Housing](#)
2. HUD Secretary Scott Turner Launches [DOGE Task Force to Eliminate Waste, Fraud and Abuse](#)
 - [DOGE Website](#)
3. HUD Workforce Reduction and Office Closures – Target Reduction: 50%; Field Offices: 50% Agency RIF Plans submitted on March 14; Another "Fork in the Road" deadline was April 11.
 - HUD Secretary Turner pushes back on cuts in [post on X](#) and recent [Fox News Interview](#)
 - Senators Rounds (R-SD) and Reed (D-RI) lead [Bipartisan Letter Urging Against HUD Field Office Closures](#) (March 12)



1. HUD Revamps its [Website](#)
2. HUD [Announces](#) New Headquarters in Alexandria, VA
3. HUD [announced](#) the Federal Housing Administration (FHA) will propose an across-the-board leveling of its Upfront Capitalized and Annual Mortgage Insurance Premiums (MIPs) to 25 basis points for all Multifamily program categories; Eliminate the Multifamily Green and Energy Efficient Mortgage (Green MIP)
4. [HUD, Ginnie Mae, and Korea Housing Finance Corporation Sign Agreement to Advance Affordable Housing and Strategic Housing Finance Cooperation](#)



1. HUD and DHS Secretaries [Establish Partnership on "American Housing Programs for American Citizens"](#)
 - Memorandum of Understanding (MOU), to end the wasteful misappropriation of taxpayer dollars to benefit illegal aliens instead of American citizens.
 - HUD will provide a full-time staff member to assist in operations at the Incident Command Center (ICC), establishing an interagency partnership to facilitate data sharing and ensure taxpayer-funded housing programs are not used to harbor or benefit illegal aliens.
 - HUD, through its office of PIH, instructed Moving to Work (MTW) Public Housing Authorities (PHAs) to comply with Section 214 of the Housing and Community Development Act of 1980, prohibiting HUD-funded service providers from providing financial assistance to illegal immigrants.



2. HUD Secretary Turner [Doubles Down on Ensuring HUD Resources Do Not Benefit Illegal Aliens](#)
 - [April 2025 Letter](#) sent to HUD Grantees and Stakeholders:
 - "I directed HUD senior leadership to review our programs and institute mechanisms that can ensure that HUD programs are compliant with President Trump's Executive Order. For example, going forward, grant agreements will include language that will require compliance with Executive Order 14219, and the Department will take steps to ensure that Federal resources are not used to support "sanctuary" policies of State and local jurisdictions that actively prevent federal authorities from deporting illegal aliens."
3. [Forthcoming Actions](#): HUD may soon republish/update a 2019 rule that would have ended rental assistance proration for "mixed status households": [Housing and Community Development Act of 1980: Verification of Eligible Status](#) (This 2019 version was [withdrawn](#) in 2021)



- [Improper Payments: Information on Agencies' Fiscal Year 2024 Estimates \(GAO, March 2025\)](#) and [HUD OIG Audit Finds HUD Could Not Test Improper Payments for 8th Consecutive Year \(May 2025\)](#)
 - **Key Takeaway:** For the eighth consecutive year, HUD has failed to accurately estimate improper payments for its two largest rental assistance programs (TBRA and PBRA), raising significant concerns about taxpayer fund integrity.
 - **HUD Oversight Concerns:**
 - **Lack of Coordination:** HUD leadership has failed to effectively coordinate across offices.
 - **Decentralized Administration:** Thousands of local housing administrators determine payment amounts and eligibility, complicating oversight.
 - **No Clear Plans:** Prior OIG audits consistently highlight the absence of a detailed plan and timeline for addressing noncompliance.



- **Recent Action: Early July - Audit Notification sent to selected Owners/Properties** – Improper Payment Estimate for HUD's Multifamily Project-Based Rental Assistance (MF-PBRA) Program:
 - To develop estimate, HUD OIG will test a sample of June 2025 HAP and annualize results to produce an estimate for one year. OIG use the TRACS data to select a statistical sample of tenants and review relevant documentation to ensure that the HAP from the owner was calculated correctly and supported by all necessary documentation.
 - OIG working directly with the property owners and project-based contract administrators (PBCAs) to obtain documentation and information to conduct our audit. Audit is underway and target completion of testing by April 2026.



- **NAHMA Filed Comments on Proposed Rule:** HUD has published a proposed rule to rescind its Affirmative Fair Housing Marketing (AFHM) regulations.
- AFHMP process has imperfections, rescinding these regulations would create an alarming regulatory vacuum and expose housing providers to increased legal risk.
- **Modernization, Not Elimination, Is the Appropriate Path Forward**
- A modernized AFHMP framework could incorporate:
 - Data-based outreach strategies reflecting current demographics and communication channels
 - Digital marketing practices that reach diverse populations effectively
 - Streamlined submission processes reducing administrative burden
 - Clear guidance on when to submit plans for review
- **No Adequate Replacement Exists to Ensure Fair Housing Marketing**

Upcoming HUD Regulations (Aug – Sept/Oct)

- HUD LEP Guidance Email to HUD Staff
- Repeal of 30-day Notification Requirements for the Termination of Lease for Nonpayment of Rent (likely Interim Final Rule) – ETA: Aug/Sept
- Housing and Community Development Act of 1980: Verification of Eligible Status/Mixed Status (likely Proposed Rule) – ETA – Aug/Sept
- Establishing Flexibility For Implementation Of Work Requirements And Term Limits in HUD- Assisted Housing Programs (likely Proposed Rule) – ETA – Sept
- NSPIRE Standards Revised - (Notice for Comments) – ETA - October

Upcoming HUD Regulations (Aug – Sept/Oct)

- HUD LEP Guidance Email to HUD Staff
- Implementing the [DOJ Memo](#) (dated July 14th) to implement Executive Order
- HUD to discontinue LEP Website and Translations
- ‘One Voice, One Language’ Policy (English-only)
- News Articles: [Mortgage Point](#) ;
- Recommend Downloading [LEP Documents Materials](#) (NAHMA has access to the documents from industry partners who have them downloaded).

Upcoming HUD Regulations (Aug – Sept/Oct)

- Repeal of 30-day Notification Requirements for the Termination of Lease for Nonpayment of Rent (likely Interim Final Rule) – ETA: Aug/Sept

PHAs ask for Rent Freeze due to Likely Voucher Shortfall



HUD: HOTMA Forms Updated on MFH Drafting Table/FR

- The Office of Multifamily Housing Programs (MFH) published updated **Housing Opportunity Through Modernization Act of 2016 (HOTMA)** related forms to the [Drafting Table](#) to ensure stakeholders have adequate time to consider and offer comment on proposed changes to these forms.
- As required by the **Paperwork Reduction Act (PRA)**, the forms were made available for public comment via **Federal Register Notice** published on **July 9, 2024**. The versions of the forms now posted on this Drafting Table reflect revisions made since the close of the 60-day comment period.
- **Sept. 13: Federal Register Notice on HUD Forms - 30-Day Notice of Proposed Information Collection: Owner's Certification With HUD Tenant Eligibility and Rent Procedures** in the Federal Register. HUD is seeking approval from OMB for forms including: HUD-50059, HUD-50059 Instructions, HUD-50059-A, HUD-50059-B, HUD-9887/9887-A, HUD-27061-H, HUD-92236, HUD-90100, HUD-90101, HUD-90102, HUD-90104, HUD-90105-a, HUD-90105-b, HUD-90105-c, HUD-90105-d, HUD-90106, HUD-90011 (Enterprise Income Verification (EIV) System Multifamily Housing Coordinator Access Authorization Form), HUD-90012 (Enterprise Income Verification (EIV) System User Access Authorization Form), EIV and You Brochure, Resident Rights and Responsibilities Brochure, and Fact Sheet for HUD Assisted Residents. **The comment deadline is October 15. If you would like to submit comments through NAHMA, please send by Friday, Oct. 10th. Please see the FR notice for more details.**
- For questions regarding the HOTMA related forms, please contact MFH_HOTMA@hud.gov.

HUD Updates

- **Relief for RAD Projects Facing Extraordinary Costs** – “To help address rising operating costs and insufficient rent adjustments, owners of RAD projects may now request a one-time good-cause exception to the use of the standard OCAF when they demonstrate that cost increases are beyond their control and are causing severe financial strain.”
- **Funding Instructions for Projects Converting Under RAD Now Available** - Multifamily Office of Recapitalization (Recap) has released updated guidance for Public Housing Authorities (PHAs) and their development partners on the funding mechanics of public housing projects during the initial years following conversion under the Rental Assistance Demonstration (RAD) program, including for projects using both RAD and Section 18 disposition authority (RAD/Section 18 Blends). **This guidance** provides detail on how the RAD Project-Based Voucher or Project-Based Rental Assistance Housing Assistance Payment contract is funded during the year of conversion, the first full calendar year after conversion, and for subsequent years



- In Early March, Novogradac, AHTCC, Enterprise, NAHB, NAHMA, NCSHA, and NMHC, [sent a request to IRS clarification on income and rent limits](#) relating to the Housing and Economic Recovery Act of 2008 ("HERA") The IRS has not issued any formal guidance as to how two policies should be implemented: (1) HERA Special adjustment for counties with no income decrease in 2007 or 2008 due to HUD's hold harmless policy, (2) HERA Hold Harmless provision to prevent income limits from decreasing; As more projects are reaching year 15 and income limits are increasingly volatile the industry has critical questions about how the hold harmless and HERA Special limits should be applied.
- IRS Publishes [Population Figures](#) to Calculate LIHTC, Private Activity Bond Cap for CY 2025 (April 14th)



- **2026 Proposed Budget Requirements** (shared RD email on Sept. 9th)
- **April 2: RD Removes DEIA Scoring Criteria from MPR and TA Grant Programs**
 - RD will not consider previous Administration DEIA-based "key priorities" and discretionary points while scoring applications submitted under the following programs: **Multifamily Housing Preservation and Revitalization Program** and the **Multifamily Housing Technical Assistance Grant Program**.
 - Applicants do not need to withdraw, submit a new or revised application, or supplement their application. The program will review the application consistent with this notice.
 - [Stakeholder Announcement](#)



- **USDA Update: MFH Handbook 2-3560 Chapter 6 Updates for HOTMA Implementation**
- To accommodate the required HOTMA changes, Rural Development (RD) published updates to [Chapter 6 Handbook 2-3560](#) on June 13, 2025. All MFH tenant certifications effective on or after July 1, 2025, must comply with HOTMA requirements. However, between July 1, 2025, and January 1, 2026, RD will not penalize MFH owners for HOTMA-related tenant file errors during supervisory reviews.
- For previously published RD HOTMA guidance :
- [Unnumbered letter published August 15, 2024](#), HOTMA Overview and projected timeline, with notable changes:
 - On October 3, 2024, MFH announced a delay in the implementation of HOTMA from January 1, 2025, to July 1, 2025.
 - RD has made a change in how unborn children are considered. Unborn children will be considered when determining household eligibility in regard to income. A pregnant women will be considered a two-person household and will qualify under the income limits of a two-person household. The household will not receive a \$480 deduction until after the child is born. This aligns RD with other affordable housing programs like HUD and LIHTC.
- The updated Form RD 3560-8 Tenant Certification was published on December 6, 2024 (revised on April 18, 2025) and is available on the [eForms](#). The previous form has been re-numbered RD3560-8A to be used for tenant certifications effective prior to July 1, 2025.



Share Your Story About LIHTC's Impact with Lawmakers

[Advocacy Resources, Factsheets, and Guides](#)

2025 In-District Advocacy Guide

Learn how to advocate for the Affordable Housing Credit Improvement Act (AHCIA) in your home district whether you have 5 minutes, 15 minutes, or more, and find out how to learn how to talk about the Housing Credit. How to write a letter to your congressman or spread how to create a social media video, and more!

Read about the advocacy actions that you can take below!

Illustration of a house

[Find out more](#)

Illustration of a person writing

[Find out more](#)

Illustration of a person speaking

[Find out more](#)

Illustration of a person holding a sign

[Find out more](#)

Illustration of a person holding a sign

[Find out more](#)

Illustration of a person holding a sign

[Find out more](#)

ACTION National, State, & District Posters

Download and print these posters to use in your district. They are designed to be used in a variety of ways, including as a poster, a handout, or a social media post.

Additional Resources

[Download and print these posters to use in your district.](#)

LIHTC's Impact in the U.S.

- [ACTION Campaign National and State Factsheets](#)
- The Housing Credit's Benefits For Low- Income Families And The Economy (1986 – 2023):**
 - 4 million** homes developed or preserved
 - 9.28 million** low-income households served
 - 6.6 million jobs** supported for one year
 - \$268.1 billion** in tax revenue generated
 - \$746.5 billion** in wages & business income generated
- Up to 1,589,100 additional affordable homes** could be financed across the United States by the primary unit financing provisions in the Affordable Housing Credit Improvement Act.

Low-Income Housing Tax Credit

Impact to the United States

The Housing Credit's Benefits For Low-Income Families And The Economy (1986 – 2023)

- 4 million** homes developed or preserved
- 9.28 million** low-income households served
- 6.6 million** jobs supported for one year
- \$268.1 billion** in tax revenue generated
- \$746.5 billion** in wages & business income generated

The Affordable Housing Credit Improvement Act (AHCIA) will provide an additional 1,589,100 additional affordable homes could be financed across the United States by the primary unit financing provisions in the Affordable Housing Credit Improvement Act.



- [Regulation Increases Housing Costs, New Study Finds](#) (MetroSight Research, sponsored by NAA and NMHC)
- [NLIHC: The Gap - A Shortage of Affordable Homes](#)
- [Harvard JCHS – \(report\) State of Nation's Housing 2025](#)
- [Harvard JCHS – \(Paper\) Household and New Housing Unit Demand Projections for 2025–2035 and 2035–2045 and Deteriorating Rental Affordability An Update on America's Rental Housing 2024](#)
- [NAAHL Special Report: The Real Cost of Cuts to HUD, USDA, and Treasury](#)
- [Implications of Further HUD Staffing Cuts on the Housing Sector \(Ben Metcalf, March 13\)](#)
- [Trump administration throws hundreds of affordable housing projects into limbo after contract cuts \(AP, March 7\)](#)
- [Urban Institute: Evaluating Rent Reporting as a Pathway to Build Credit](#)
- [SAHF: Housing Stability Cohort: A Practitioner's Guide](#)
