



November 24, 2025

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

Re: Opposition to Proposed Changes in the Continuum of Care Program

Dear Secretary Turner,

On behalf of The New England Council, the nation's oldest regional business association representing hundreds of companies, institutions, and organizations across all six New England states, we write to express our serious concern regarding the upcoming policy changes to the Continuum of Care (CoC) program at HUD. The proposed shift, which would redirect more than half of the 2026 funding for permanent housing assistance to transitional housing with service or work requirements, raises significant concerns about housing stability, local decision-making, and the effectiveness of our regional housing system.

As the leading regional advocate for economic growth and opportunity, the Council understands that affordable, accessible, and stable housing is essential for maintaining a competitive workforce, promoting economic mobility, and ensuring the long-term success of our communities. The CoC program has consistently played a key role in addressing homelessness by supporting permanent supportive housing and enabling communities to develop responses based on local knowledge and partnerships. We are deeply troubled that the proposed changes may undermine these foundational elements by:

- Reducing the share of funds allocated to permanent housing from roughly 87 percent to just 30 percent, according to internal HUD documentation.
- Introducing a shortened application window and timing that could leave current projects without funding as the coldest months of the year approach.
- Reducing local jurisdiction discretion when regional housing and homelessness providers need flexibility, not constraints; and
- Departing from a robust body of research that consistently demonstrates that permanent supportive housing and rapid rehousing result in better long-term outcomes and lower costs, especially for individuals and families experiencing chronic homelessness.

The New England Council

98 North Washington Street, Suite 303 • Boston, Massachusetts 02114 • (617) 723-4009
1411 K Street, NW, Suite 700 • Washington, DC 20005 • (202) 547-0048
www.newenglandcouncil.com

New England states are already dealing with severe housing supply shortages, workforce affordability issues, and an urgent need for long-lasting solutions. While we appreciate HUD's goal to promote recovery and self-sufficiency, we believe that disrupting existing permanent housing supports now could undo hard-won progress, increase the risk of displacement, and ultimately raise costs across various systems.

Accordingly, we respectfully urge HUD to:

1. Pause implementation of the proposed policy changes until full consultation with regional and local stakeholders has occurred.
2. Maintain the authorized two-year Notice of Funding Opportunity (NOFO) process, thereby preserving continuity; and
3. Partner with affected states and localities to ensure any reform advances program integrity and accountability without jeopardizing housing stability during a high-risk period.

The Council is eager to support this effort. We are prepared to bring together our members, including housing developers, providers, financial institutions, healthcare systems, local governments, and community partners, to work with HUD toward a solution that protects housing stability, encourages local innovation, and aligns federal and state initiatives.

Thank you for your leadership in tackling our nation's housing issues and for considering these critical concerns. If you have any questions, please contact Natasha Silva, Director of Federal Affairs, at nsilva@newenglandcouncil.com. We look forward to your response.

Sincerely,

James T. Brett
President & CEO

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New England Congressional Delegation
The Honorable Tom Cole
The Honorable Rosa DeLauro

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