



THE UNITED STATES
CONFERENCE OF MAYORS

November 13, 2025

The Honorable Scott Turner
Secretary
U.S. Department of Housing and Urban Development

cc:

The Honorable Cindy Hyde-Smith
Chair
Senate THUD Subcommittee

The Honorable Kirsten Gillibrand
Ranking Member
Senate THUD Subcommittee

The Honorable Steve Womack
Chair
House THUD Subcommittee

The Honorable James Clyburn
Ranking Member
House THUD Subcommittee

Dear Secretary Turner,

On behalf of the nation's mayors, cities and counties, we write to respectfully urge you to adhere to the Congressionally authorized two-year Continuum-of-Care (CoC) program cycle by renewing current CoC grants for the second 12-month period. As trusted administrators of the CoC program, we recognize the vital intergovernmental partnership between the U.S. Department of Housing and Urban Development (HUD) and local governments to improve housing opportunity and reduce homelessness in our communities. It is in that context that we wish to share our concerns over a reported notice of funding opportunity (NOFO) under consideration at HUD.

We have serious concerns about the timing of a new grant competition, particularly one with revised program parameters, given that existing CoC grants are set to expire in January. The critical nature of this program demands a predictable grant cycle to avoid funding lapses. With only two months to spare, a newly initiated cycle would not allow local and non-profit CoC partners sufficient time to prepare for the NOFO's substantial changes. This would erode local capacity to effectively respond to homelessness and ultimately affect the wellbeing of our residents.

We are also concerned by reports that flexibility for local grantees may be significantly curtailed by a one-size-fits-all 30 percent limitation on allocations toward permanent supportive housing. This represents a sharp deviation from the current 87 percent of CoC expenditures dedicated to permanent housing. The direct impact to communities could be dire – approximately 170,000 formerly homeless residents, including families, veterans, older adults, and those with disabilities are expected to lose program assistance because

of this change. We are concerned that this will result in new homeless encampments in cities and counties across the country. Downstream community impacts will follow, with additional strain placed on local law enforcement, emergency rooms, behavioral health systems and social services. When permanent housing is not adequately available, cities and counties annually spend upwards of \$15,000 per unsheltered individual to ensure their service needs are effectively met.

The versatility to support a mix of approaches, including both permanent and transitional housing, is a critical tool in allowing local governments to tailor their response to their community's specific service needs. We encourage our intergovernmental partners at HUD to trust our on-the-ground perspective, as we are uniquely positioned to make choices for allocating limited funds toward reducing homelessness. At the same time, we share your desire to optimize both housing outcomes and public safety and welcome any opportunity to further discuss evidence-based reforms to community homelessness response.

With this in mind, we again urge you to adhere to the predictable two-year CoC program competition authorized by Congress that local government grantees have expended considerable time and resources planning for. Thank you for your attention to this urgent matter.

Sincerely,



Matthew D. Chase
CEO/Executive Director
National Association of
Counties



Clarence E. Anthony
CEO/Executive Director
National League of Cities



Tom Cochran
CEO/Executive Director
The US Conference of
Mayors