

June 1, 2026

Regulations Division, Office of General Counsel
Department of Housing and Urban Development
2415 Eisenhower Ave.
Alexandria, VA 22314

RE: Docket No. FR-6144-P-09, HOME Investment Partnerships Program: Further Program Updates and Streamlining

The Council of State Community Development Agencies (COSCD) welcomes the opportunity to comment on further program updates to the HOME Investment Partnerships Program (HOME). COSCD represents state agencies that administer HUD's Community Planning and Development (CPD) grants, including HOME. COSCD submitted comments to HUD's HOME Proposed Rule in 2024 and is pleased to provide feedback on the proposed changes to HUD's 2025 HOME Final Rule.

HOME Final Rule Revisions

Proposed Removal of the HOME Final Rule's 24 CFR 92.250(c) Regarding Permitting PJs to Exceed the Maximum Per-Unit Subsidy for a Project That Meets Certain Green Building Standards

In our 2024 comments, COSCD supported the proposed maximum per-unit subsidy limit flexibility to help fulfill environment and energy goals on HOME projects. However, we stated, "due to the widening housing shortages and finite amount of federal funds to meet this demand, applying HOME to maximizing the number of quality, affordable units should continue to be the agency's priority."

COSCD does not contend with HUD's removal of the 10 percent increase to per-unit subsidy limits for HOME projects that comply with green building standards. In the future, though, some Participating Jurisdictions (PJs) may still find it useful for HUD to publish—whether in the Federal Register or elsewhere—a set of green building standards that could lower utility costs for tenants and support sustainable property development.

Tenant Protections and Selection

COSCD did not comment extensively on tenant protection and selection updates in the HOME Proposed Rule. Our members administer HOME funding at the state level and ensure compliance with federal requirements, but they do not typically manage the day-to-day operations of HOME-funded properties. While COSCD supports tenant rights and responsible housing operations, we also value the participation of developers and alignment with market norms where possible. Our prior comments included the following: "COSCD appreciates efforts to protect tenants, but considerations should be made to ensure that developers and landlords are not deterred from participating in the program." COSCD supports HUD's intent to make tenant requirements and lease addenda easier to interpret and implement.

We urge HUD to carefully consider comments from HOME landlords, developers, and tenant advocates who have direct experience with HOME property operations before finalizing updates to the programs' tenant protections and selection process. For instance, HUD proposes to strike requirements at 24 CFR 92.253(e)(4) to require owners to accept all forms of Federal, State, or local tenant-based rental assistance. COSCDA members have communicated that—given ongoing housing supply challenges faced nationwide—asking HOME-funded units to accept tenant-based rental assistance in all forms is a reasonable requirement.

Other HOME Program Updates and Streamlining

Alignment with NSPIRE: Life-Threatening Deficiencies and Carbon Monoxide Detection

COSCDA supports HUD's continued efforts to align HOME inspection requirements with other HUD programs, especially those that commonly include HOME funds as part of a project's capital stack. As instructed by HUD¹, PJs are transitioning to the National Standards for the Physical Inspection of Real Estate (NSPIRE) inspection protocol. For this reason, COSCDA supports the proposed change of "health and safety" to "life-threatening" throughout 24 CFR 21.251(f)(5). This language better aligns with NSPIRE's categories of safety standards. We also support HUD's proposal to maintain exceptions for small-scale housing to lessen the administrative burden of such inspections on certain tenants and PJs.

COSCDA also welcomes HUD's proposal to align HOME's carbon monoxide detection requirements with other HUD programs subject to NSPIRE inspection standards. We urge HUD to provide additional guidance and technical assistance as needed to successfully implement this new requirement for HOME-funded projects.

Scattered Site Manufactured Housing Rental Projects

COSCDA supports HUD's intent to make it easier to use HOME to support the development and use of manufactured housing. In remote and rural areas, the ability to transport pre-built quality homes to communities where on-site construction may not be feasible due to logistics or costs could dramatically increase the affordable housing stock. COSCDA specifically supports the following proposed streamlined requirements for scattered site manufactured housing rental projects that are already allowed for "small-scale" housing under the HOME Final Rule:

- PJs are not required to adopt a more frequent inspection schedule for scattered site manufactured housing rental projects that have been found to have life-threatening deficiencies;
- Reduce the frequency of income examinations for scattered site manufactured housing rental projects to triennial income examinations for occupants of such housing; and
- Permit PJs to establish an alternative procedure to a written waiting list for the selection of tenants in scattered site manufactured housing rental projects.

Application of PRWORA to the HOME Program

COSCDA notes HUD's assertion that HOME grantees must comply with the immigration restrictions and requirements under title IV of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA). We acknowledge that Fiscal Year 2025 (FY25) HOME grant agreements included Addendum 1 policy requirements such as, "the Recipient must use SAVE, or an equivalent verification system approved by the Federal government, to prevent any Federal public benefit from being provided to an ineligible alien who entered the United States illegally or is otherwise present in the United States."

¹ [National Standards for the Physical Inspection of Real Estate: Implementation Guidance and Inspection Standards for the HOME Investment Partnerships and Housing Trust Fund Programs](#)

COSCD A wrote a letter to HUD leadership in November 2025 requesting additional guidance for CPD grantees—including HOME PJs—on the use of the Systematic Alien Verification for Entitlements (SAVE) platform². We have not yet received a formal response. In a November 26, 2025 notice³, HUD said it would be “issuing new guidelines related to the verification for benefits provided through its housing assistance and grant programs... HUD will be relying on guidance issued by the Department of Homeland Security once that is published.” Until additional guidance on PRWORA implementation and SAVE is available, we urge HUD to clarify what it believes to be proper compliance from HOME grantees.

Thank you for the opportunity to comment on further proposed updates to the HOME Investment Partnerships Program. For further communication regarding COSCD A’s comments, please contact Jenna Hampton Pomponi (jhampton@coscda.org), Director of Advocacy and Federal Programs.

Sincerely,

A handwritten signature in black ink, appearing to read 'Tess Hembree', with a stylized flourish at the end.

Tess Hembree
Executive Director, COSCD A

² [November 2025 Letter from COSCD A Requesting SAVE Guidance](#)

³ [Personal Responsibility and Work Opportunity Reconciliation Act of 1996 \(PRWORA\); Interpretation of “Federal Public Benefit”](#)