

August 6, 2026

The Honorable Eric Scott Turner
Secretary
Department of Housing and Urban Development
2415 Eisenhower Ave.
Alexandria, VA 22314

Mr. Ronald Kurtz
Assistant Secretary
Community Planning and Development
Department of Housing and Urban Development
2415 Eisenhower Ave.
Alexandria, VA 22314

Mr. Bryan Horn
Deputy Assistant Secretary
Office of Grant Programs
Department of Housing and Urban Development
2415 Eisenhower Ave.
Alexandria, VA 22314

Dear Secretary Turner, Mr. Kurtz, and Mr. Horn,

The Council of State Community Development Agencies (COSCD A) writes to acknowledge the enactment of the *21st Century ROAD to Housing Act* (ROAD). We applaud this new housing and community development law that will modernize and improve many of HUD's grant programs.

COSCD A is a national association of state agencies that administer HUD's Community Planning and Development (CPD) grants. Specifically, our members manage the following grant programs at the state level:

- Community Development Block Grant (CDBG)
- Community Development Block Grant Disaster Recovery (CDBG-DR)
- HOME Investment Partnerships Program (HOME)
- Housing Trust Fund (HTF)
- Emergency Solutions Grants (ESG)
- Continuum of Care (CoC)
- *Plus, additional emergency and pilot grant programs*

Our state agency members have a wealth of experience overseeing HUD grant programs. **We anticipate the need for extensive guidance and careful implementation of ROAD's many provisions. COSCD A offers our support to HUD during ROAD's implementation process.** COSCD A staff are available to meet with HUD at any time. We also invite HUD leadership and staff to attend COSCD A's two annual training conferences to directly connect with state-level CPD grant managers. Formal invitations will arrive through separate communications.

Below, COSCD A highlights sections of ROAD that are relevant to CPD programs. We note where ROAD requires action from HUD and where additional guidance may be needed. COSCD A commends the passage of this significant housing and community development law and we look forward to working with HUD on successful implementation.

Sincerely,



Tess Hembree
Executive Director
Council of State Community Development Agencies (COSCDA)

ROAD Sections that Update Existing Programs

Title I, Section 104: Database of publicly owned land

CPD Program: Community Development Block Grant (CDBG)

Section 104 requires CDBG recipients to “maintain, on a publicly accessible website, a searchable database that identifies all parcels of undeveloped land owned by the grantee.” *ROAD* does not explicitly define “undeveloped land.” COSCDA assumes the intent of this section is to capture raw, undeveloped land that does not contain existing structures such as vacant or abandoned buildings. However, CDBG recipients will need more guidance from HUD on database requirements and an official definition of “undeveloped land.”

Section 104 also authorizes an eligible activity that allows for CDBG Funding to support the creation and maintenance of these required databases. COSCDA notes that non-entitlement, state CDBG recipients do not carry out CDBG activities—instead, they award grants to subrecipients for CDBG activities. We request guidance from HUD on how state CDBG recipients should fund the required land database if they are unable to use an eligible activity for funding. We urge HUD **not** to direct state CDBG programs to pass through the database requirement to subrecipients.

ROAD lists the effective date for Section 104 as October 1, 2026. Accordingly, the database requirement will apply to CDBG grants starting in Fiscal Year 2027 (FY27). COSCDA urges HUD to expedite guidance to enable CDBG recipients to account for database development in their annual planning processes.

Title II, Section 204: Addition of affordable housing construction as an eligible activity

CPD Program: Community Development Block Grant (CDBG)

COSCDA is pleased that *ROAD* authorized new construction of affordable housing as a CDBG eligible activity. This activity will allow greater flexibility for CDBG recipients to meet the needs of their communities. Although Section 204 does not require HUD to produce any regulations or guidance, COSCDA urges HUD to ensure there is enough guidance and training available to support CDBG recipients that plan to build affordable housing.

Section 204 ties CDBG housing construction to the affordability requirements under Section 215 of the *Cranston-Gonzalez National Affordable Housing Act*—the law that authorized the HOME program. These requirements do not align perfectly with existing CDBG housing affordability requirements. For example, rental housing activities under the CDBG program must generally benefit low- to moderate-income (LMI)

households, which is defined as up to 80 percent of area median income. For multifamily HOME projects, however, *Cranston-Gonzalez* requires 90 percent of units be occupied at households with incomes up to 60% of area median income. We urge HUD to help CDBG recipients understand the requirements at Section 215 of *Cranston-Gonzalez*, especially considering that *ROAD* updates Section 215 as part of Section 501 updates to the HOME program.

Title II, Section 206: Unlocking Housing Supply Through Streamlined and Modernized Reviews Act

CPD Program: Cross-Cutting (more than one)

COSCDCA supports common sense efforts to streamline *National Environmental Policy Act* (NEPA) requirements. Section 206 updates HUD's NEPA regulations at 24 CFR part 58 and part 50 to facilitate the development of small and infill housing. COSCDCA asks HUD to ensure all CPD grantees are aware of these updates and that adequate guidance is provided.

Title V, Section 501: HOME Investment Partnerships Reauthorization and Reform Act

CPD Program: HOME Investment Partnerships Program

COSCDCA celebrates the inclusion of this section in *ROAD*. HOME has been one of the most effective and flexible tools states and localities have available to meet their affordable housing needs. Section 501 will align the HOME program with current development realities and increase its effectiveness at producing housing supply. We urge HUD to update HOME program regulations and guidance as soon as possible to facilitate the implementation of these changes.

COSCDCA supports American manufacturing and the intent behind Build America, Buy America (BABA) procurement requirements. HUD has issued public interest waivers intended to ease the impact of BABA where American-made materials are unavailable or would require unreasonable costs. However, the waiver process remains underdeveloped and can take upwards of six months for approval. COSCDCA commends the inclusion of a BABA review in Section 501 and asks HUD to carefully consider the impacts of BABA on the HOME program and all possible solutions.

Finally, COSCDCA is a co-leading organization of the national HOME Coalition. The HOME Coalition is also available to support HUD's implementation of Section 501. COSCDCA can facilitate a connection between HUD and other members of the HOME Coalition if needed.

Title V, Section 503: Incentivizing Local Solutions to Homelessness

CPD Program: Emergency Solutions Grant (ESG)

COSCDCA is pleased with this additional flexibility for ESG grant recipients for FY27 through FY230 funding. With these newly authorized waivers, states will be better able to coordinate their homelessness response and provide emergency shelter. We urge HUD to quickly notify ESG grantees about the waiver request process with enough time to consider a waiver for FY27 ESG grants.

Title V, Section 504: Reforming Disaster Recovery Act

CPD Program: Community Development Block Grant Disaster Recovery (CDBG-DR)

The three-year authorization of HUD's CDBG-DR program is one of the most complex statutory updates included in *ROAD*. Although Congress has allocated more than \$100 billion to the CDBG-DR program, it has

never been officially authorized. *ROAD* places HUD on an accelerated timeline to draft proposed rules within six months of enactment (January 2027) and to publish final rules within a year of enactment (July 2027). COSCDAs members have managed a large share of CDBG-DR grants to respond to disasters in their states. Our members are willing to talk to HUD about their experiences and recommendations to improve the program as HUD implements Section 504.

For the sake of program consistency, we urge HUD to use the Universal Notice as a starting point for forthcoming CDBG-DR proposed rules. HUD launched a thorough process to request information and develop the Universal Notice before publishing it in 2025. There has only been one round of CDBG-DR allocations since the Universal Notice—COSCDAs does not recommend deviating too much from this framework through new proposed rules, though we understand some changes may need to be made in response to statutory requirements and other observations.

ROAD Sections that Authorize Pilot Programs

In general, COSCDA urges HUD to prioritize *ROAD* implementation for existing programs before working on newly authorized pilot programs. Many of these pilot programs have worthwhile goals, but it is unclear yet whether Congress will provide sufficient funding to bring them to life. State agencies would be eligible for funding under the pilot programs listed below. If Congress funds these pilot programs, we urge HUD to design them in such a way that state agencies could be competitive to receive funding.

Title I, Section 102: Federal guidelines for point-access block buildings

Title II, Section 202: Whole-Home Repairs Act

Title II, Section 207: Grants for planning and implementation associated with affordable housing

Title II, Section 210: Revitalizing Empty Structures Into Desirable Environments (RESIDE) Act

Title III, Section 304: PRICE Act