

Marc Elrich
County Executive

September 30, 2025

The Honorable Angela Alsobrooks United States Senate 374 Russell Senate Office Building Washington, D.C. 20510

Dear Senator Alsobrooks:

Montgomery County writes today to express serious concerns about the Fiscal Year 2025 Continuum of Care Program Notice of Funding Opportunity (FY25 NOFO) that is slated to be released this week by the Department of Housing and Urban Development (HUD). Advocates across the country are deeply worried that HUD will use the FY25 NOFO to dramatically re-shape the Continuum of Care (CoC) program requirements, upending the ways communities, including Montgomery County, respond to homelessness while only allowing two weeks for submission of an application.

Montgomery County has utilized CoC funding for years to support existing housing programs; with the anticipated changes to the program, HUD may require localities to ban encampments of unhoused people and require cooperation with federal immigration enforcement as conditions of funding awards. This could jeopardize HUD-funded housing of up to 757 people in Montgomery County, most of whom are people with disabilities, who live with minor children (457 individuals) or are over age 65 (54 individuals). In addition to destabilizing our systems of rapid re-housing and permanent supportive housing, a loss of funding for Montgomery County's program would result in \$8.3M less in leasing and rental assistance received by 198 local landlords and the loss of employment for 47 CoC program staff.

Not only does the County resist this administration's policy objectives to target those in our communities who are at the most vulnerable points in their lives, we note that any extreme overhaul to program requirements require adequate time to respond and the quick response time to the FY25 NOFO will result in significant funding delays. Recent criteria in other NOFOs issued by HUD have included new onerous conditions that are unrelated to homeless services that could place these critical resources at risk in communities across the country, no matter their political inclination.

Section 166 from the Continuing Appropriations and Extensions and Other Matters Act, 2026 (S.2882/H.R. 5450) (CR), a short-term funding measure, was recently introduced by Representative Rosa DeLauro, D-CT-03 (House Appropriations Committee – Ranking Member) and Senator Patty Murray, D-WA (Senate Appropriations Committee – Vice Chair). The language in Section 166 would require that HUD renew all existing CoC grants expiring during calendar year 2026 for one 12-month period. This would prevent these draconian program requirements from being issued without adequate time for localities, advocates, and policy makers to respond. We ask you to protect homelessness

The Honorable Angela Alsobrooks September 30, 2025 Page 2 of 2

funding by ensuring that Section 166 remains in the short-term CR to maintain our access to critical resources. Section 166 is a no-cost provision.

It abides by past Congressional direction in FY2024 authorizing HUD to issue a two-year NOFO process for FY24 and FY25 funds for the CoC program. Congress universally rejected the President's FY26 Budget Proposal for the Homeless Assistance Grants programs; please do not let HUD succeed in dismantling the CoC Program and homelessness response systems across the country via the FY25 NOFO.

Sincerely,

Marc Elrich

County Executive