# Updated: Major Actions of the Second Trump Administration Affecting Housing (1/20/25 through 6/2/25)

Reporting by Shelterforce's Miriam Axel-Lute, Lara Heard, and Shelby R. King

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#### **Executive Orders**

Executive orders are instructions to executive agencies about the executive branch's priorities and policies. They are not laws, and cannot contradict or override laws.

• Anti-DEI: Early in his term, President Trump targeted diversity, equity, and inclusion programs in executive orders and called for the removal of all related policies, programs, jobs, and grants from the federal government. Soon, the Office of Management and Budget announced that federal funding would be frozen as agencies were reviewed for compliance with Trump's orders, including the DEI crackdown. District judges temporarily blocked the funding freeze almost immediately, although the federal government failed to comply. Many housing providers were temporarily locked out from accessing their funds, creating ongoing concern about the reliability of the federal government. Multiple ongoing lawsuits have been brought by various groups—including the National Council of Nonprofits and a number of states—against various agencies of the federal government for withholding funding. The fight is ongoing, although the broad federal funding freeze—which implicates trillions of dollars—is still blocked by the courts, but the federal government has appealed.

One important case was brought by a group of plaintiffs, including the Baltimore mayor and city council and the National Association of Diversity Officers in Higher Education. On Feb. 21, a federal judge ruled against Trump's attack on DEI in the case, finding that the administration couldn't modify federal contracts because they have equity components. On March 10, the court clarified that this decision applied to all agencies. But four days later, the Fourth Circuit Court of Appeals put a stay on that order—pending a more thorough review and decision.

On May 2, a judge declined to issue a preliminary injunction in a case brought by a

group of civil rights organizations including the National Fair Housing Alliance against the anti-DEI and anti-trans executive orders. A <u>statement</u> by the NAACP Legal Defense Fund on the ruling notes that the decision did not mean that any of the programs targeted by the executive order are illegal, nor that all of the actions taken by the administration in carrying out the executive orders are legal.

After facing criticism from the HUD Secretary for including a program to support minority-owned businesses in its draft proposal for Hurricane Helene relief funds, Asheville, North Carolina, removed the program from its request, and HUD approved its relief funds on May 15.

- Anti-Trans: A Jan. 20 executive order targeting trans people included an instruction to block federal grants from being used to "promote gender ideology." It also called on HUD (the Department of Housing and Urban Development) to take steps to remove the 2016 Equal Access rule, which (among other protections) requires homeless shelters to accommodate clients based on their gender identity. On Feb. 7, HUD Secretary Scott Turner announced that the agency would no longer enforce the rule. It's still the law of the land, though that could change—according to the website for the Office of Information and Regulatory Affairs, a rule has been proposed to revise the Equal Access Rule. According to reporting by the Associated Press, HUD's Office of Fair Housing and Equal Opportunity is under orders to stop investigating discrimination on the basis of gender identity. Another result of the executive order: homelessness service grant recipients were required to sign contracts affirming that they won't promote "gender ideology." See "Continuum of Care" below for more information.
- Anti-Climate: Trump has issued multiple executive orders concerning the climate. One such order called for a pause and review of funds under the Inflation Reduction Act and Infrastructure Investment and Jobs Act, two massive climate funds passed under the Biden administration. One affected revenue stream was the Greenhouse Gas Reduction Fund (GGRF), a \$27 billion fund for green projects largely intended for underinvested communities (including affordable housing). In February, the new administration claimed that \$20 billion of the GGRF had been mishandled and issued with political bias, and grantees of two of the major funding streams were blocked from accessing their awards through Citibank. On March 8, one of the grantees, Climate United, sued the Environmental Protection Agency (EPA) and Citibank for freezing their accounts. (Other grantees also sued the bank soon after.) On March 17, a U.S. district judge issued a temporary restraining order on EPA's block of the GGRF, and on April 15, the same judge ordered the administration and the bank to provide the funds. But the EPA appealed, and that order was stayed, again blocking recipients from accessing their awards. The case is ongoing, but in the meantime, projects are on hold and some grantees have been forced to make salary and staff cuts. On May 19, an appellate panel of three judges—two appointed by Trump, one by Obama—heard arguments from both sides. According to reporting by *Politico*, though the judges "appeared skeptical of EPA's reasons for terminating \$20 billion in Biden-era climate grants," the two Trump-appointed

judges questioned whether the case should be heard by a different court, the Court of Federal Claims, as it could be considered a contract dispute. According to *Politico*, "If EPA should lose before the D.C. Circuit, [EPA Administrator Lee] Zeldin made it clear last week that he will appeal."

- **USICH and CDFI Fund:** On March 14, Trump issued an executive order that calls for reducing the activities and staff of numerous agencies and institutions—including the US Interagency Council on Homelessness (USICH) and the CDFI Fund (Community Development Financial Institutions Fund)—to the extent legally possible. The CDFI Fund portion of the executive order was met with backlash, including from some Republican lawmakers. Multiple organizations in the community development field criticized the order, stressing the CDFI Fund's bipartisan popularity and widespread impact. So far, there haven't been major changes, although advocates worry that staff cuts could occur as they have in other programs and agencies. Treasury representatives have said that the CDFI Fund will continue its work as usual, and the Treasury issued a report to the Office of Management and Budget indicating that all 11 CDFI Fund programs are required under statute. The CDFI Fund is fully funded for now—the 2025 budget passed without cuts. But the future is less certain. On May 2, Trump's 2026 budget request was announced. It calls for USICH to be completely defunded and creates a new \$100 million "Rural Financial Award Program" that would use "administrative resources" from the CDFI Fund to invest in rural communities. It also calls to defund CDFI Fund discretionary awards.
- Anti-Civil Rights: On April 23, Trump issued an executive order stating his intent to
  rescind regulation implementing and cease enforcement of any components of civil
  rights laws that use the disparate impact standard. This legal standard states that if a
  policy or procedure that has a disparate impact on a protected class, and is unnecessary
  and unjustified, civil rights laws can require it be changed, even if it was not created with
  an intent to discriminate. Disparate impact comes up frequently in fair housing
  enforcement. The use of disparate impact as a standard was upheld by the Supreme
  Court in 2015.

# **Staffing Cuts**

• Overall: A three-judge panel at the 9th Circuit Court of Appeals on May 30 blocked the Trump administration from firing huge swaths of the federal workforce, leaving in place a May 22 ruling by a lower court that Trump cannot implement widespread federal layoffs without congressional approval. The San Francisco-based court's decision denies Trump's request to stay the earlier decision pending appeal and again temporarily blocks mass layoffs across approximately 20 agencies, including the Department of Health and Human Services and the Department of Veterans Affairs. Trump is expected to appeal to the U.S. Supreme Court to pause the latest ruling. As of April 21, according to the National Low Income Housing Coalition, 2,300 HUD employees—or around 23 percent of the agency's total workforce—had retired, been placed on administrative

leave, or participated in the Deferred Resignation Program. The administration has set a goal of cutting HUD's staffing by approximately 50 percent, though the planned cuts would not affect all departments evenly, and according to Government Executive more Reduction in Force notices are expected soon from the agency.

- Probationary Employees: 300 probationary employees were fired on Feb 14, then
  reinstated on March 17 and immediately placed on administrative leave, but, unlike
  probationary employees reinstated at other agencies, they were not given back pay.
- Field Offices: HUD is considering the closure of approximately half of its field offices in 34 states and the District of Columbia. All employees at G-13 level and below in the Office of Field Policy and Management were terminated as of May 18. (G-13 is a pay level that includes managers and specialists, most of whom have advanced degrees.) The closures are expected to affect the processing of mortgage insurance for single-family homes, affordable apartment buildings, hospitals, and nursing facilities, as well as compliance assistance for public and private HUD grantees, lenders, and partners in those areas.
- Community Planning and Development: In the HUD staffing cuts proposal, the Office of Community Planning and Development (CPD) came in for especially aggressive treatment, being slated to lose 84 percent of its staff. CPD oversees a wide range of programs that disburse federal funding to localities for various uses, including several different homelessness services programs, the Community Development Block Grant, disaster recovery funds, the HOME Investment Partnerships Program, the National Housing Trust Fund, and some smaller programs that aid rural areas and veterans. It disburses \$3.6 billion a year.
- Policy Development and Research: The Office of Policy Development and Research (PD&R) has also been singled out for particularly large staffing cuts. PD&R generates a large amount of housing market and income data that is used throughout other HUD programs and beyond, including in the Treasury Department's LIHTC (low income housing tax credit) program and by private businesses. It also researches and shares information on best practices—such as the buildings to be featured at HUD's Innovative Housing Showcase, which does appear to be moving forward this year.
- Administrative: If HUD does achieve its dramatic goal of 50 percent staff cuts, many
  will come from administrative staff who implement human resources, loans, and
  contracts, and generally make the agency's work happen. Cuts to these workforces will
  introduce significant delays and errors to many functions of the agency.
- United States Interagency Council on Homelessness (USICH): After the March 15
  executive order calling for its elimination, on April 15, the entire staff of USICH, which
  coordinates homelessness response across different federal agencies, was put on leave.
  USICH is required by law to create a strategic plan to address homelessness and deliver

an annual report to Congress, but the administration says it will carry out its functions with one or two DOGE staffers with no housing experience who are also responsible for other agencies.

New: Low Income Home Energy Assistance Program (LIHEAP): Effective April 1, Trump eliminated the entire LIHEAP staff. The 23 fired employees were responsible for ensuring approximately 6.2 million low-income households have stable access to help with heating and cooling costs. This mass firing was part of the broader HHS reduction of 10,000 employees. LIHEAP's termination reflects a sweeping reduction of support for social safety net programs, threatening the stability of energy assistance for millions of low-income Americans facing an impending summer of predicted record high temperatures.

#### **Grant and Contract Cancellations**

- Fair Housing: On Feb 27, HUD sent notices that it was going to cancel 78 Fair Housing Initiatives Program (FHIP) grants to 66 of the private nonprofit organizations that carry out about 75 percent of fair housing enforcement. That amounted to more than half of all grants under that program across the country, and affected more than 60 percent of the organizations involved. A judge issued a temporary restraining order (TRO) on March 26 directing HUD to reinstate the grants, which it did on March 27. That TRO was stayed on April 16, however, on jurisdictional grounds. The case continues as an appeal.
- Technical Assistance: On Feb 26, HUD <u>canceled contracts</u> with 8 of 34 technical assistance (TA) providers under the Community Compass program and 2 of 3 providers under the Section 4 technical assistance program. These TA providers helped smaller organizations and agencies successfully implement HUD grants. On April 9, Enterprise Community Partners, one of the affected Section 4 providers, <u>announced</u> that it had won its appeal to HUD and its contract was reinstated, and on April 11, the other affected Section 4 provider, Local Initiatives Support Corporation (LISC), <u>announced</u> the same. Enterprise's Community Compass grant was also reinstated.
- Continuum of Care: These annual grants are paid out mainly to networks of local homelessness service providers, plus some specialized providers, such as domestic violence services. The fiscal year 2024 funds had already been issued by the Biden administration and were supposed to roll out to grantees early this year, but were delayed without explanation. In the meantime, providers struggled to piece together funding and wondered if they'd have to cut services altogether. Eventually, HUD did send out contracts to awardees in March—but included new language restricting recipients from using those awards for purposes including "DEI" and advancing "gender ideology." On May 2, eight local governments filed a joint lawsuit against the administration for adding additional requirements to existing grants, including Continuum of Care grants, calling it illegal executive overreach.

• **Inspection Programs:** HUD in February <u>canceled a contract</u> issued last year to a contractor tasked with inspecting crucial safety and operational systems, including gas, electrical, and fire safety, in more than 6,000 public housing and subsidized multifamily buildings, the bulk of which are already <u>facing severe maintenance backlogs</u>.

# **Budget**

- The "One Big Beautiful Bill" Act: While beauty remains in the eye of the beholder, on May 22, the House passed H.R. 1—a controversial legislative package that includes hefty tax breaks, big spending on immigration and border patrol, and deep cuts to Medicaid—by a single-vote margin of 215–214; all Democrats voted against it. Championed by (and named with a nod to) Trump, the bill is currently being negotiated through the Senate, where it faces tough opposition. As passed by the house, H.R. 1 includes significant provisions affecting housing policy, such as:
  - Increasing the per-capita allocation of 9 percent low income housing tax credits (LIHTC) for states by 12.5 percent, effective calendar years 2026 through '29.
  - Lowering the required amount of Section 142(d) Qualified Residential Project Bonds that must be issued to obtain the 4 percent LIHTC, effective for projects placed in service after Dec. 31, 2025.
  - Allowing state agencies to <u>provide a basis boost of up to 30 points</u> for properties located in rural areas and tribal communities, effective for properties placed in service after Dec. 31, 2025, and before Jan. 1, 2030.

These changes are estimated to cost \$14.1 billion and could result in the creation of approximately 527,000 additional affordable rental housing units nationwide. The bill also proposes to extend and expand the Opportunity Zones incentive and authorizes the creation of new Opportunity Zones, which are a pet project of HUD Secretary Scott Turner.

- 2025 Housing Budget: On March 14, Congress passed a continuing resolution securing the federal government's budget through Sept. 30, which is the date fiscal year (FY) 2025 concludes. The budget included mostly level funding from FY 2024, with a few housing-related increases:
  - Section 8 Housing Assistance Payment Renewals: +\$3.653B to \$32.15B
  - Section 8 Project-Based Rental Assistance: +\$480 million to \$16.49B
    However, the Center on Budget and Policy Priorities estimated that due to increasing housing costs and general inflation the Section 8 program would have needed about
    \$4.3 billion more in FY 2025 than in FY 2024 just to provide the same level of services, and so the budget that passed could represent the loss of voucher access for almost 300,000 households. The effects of inflation mean that other housing programs facing level funding are also facing effective cuts.
- **FY 2026 Budget:** On May 2, the president released his <u>budget proposal</u>. Among the changes for HUD, which amount to a 43.6 percent cut over FY 25 approved levels, he is

#### proposing to:

- Cut Section 8 by about 40 percent and turn it into block grants to states, with two-year limits on using vouchers.
- Eliminate CDBG and HOME funding.
- Consolidate Continuum of Care and HOPWA funding under the Emergency Solutions Grant program (with resultant funding decreases).
- Eliminate the Fair Housing Initiative Program, the PRO Housing Program (which encouraged zoning reform), and the Self-Sufficiency Program.
- Cut funding for Native housing by eliminating competitive grant funding.
- Appropriate no new money for lead-hazard prevention.
- Cut all funding for new CDFI Fund discretionary awards.
- Eliminate AmeriCorps and NeighborWorks.

In terms of other departments, the budget proposal does include a funding increase for USDA's rental assistance program in order to prevent the default of the multifamily loans the department has underwritten. However, major programs that support the same populations that will be affected by HUD cuts also face elimination or damage in the proposed executive budget, such as LIHEAP. (These will be compounded by proposed cuts to SNAP and Medicaid being pursued by <a href="Congressional Republicans">Congressional Republicans</a> as they look for ways to renew the 2017 tax cut act and deliver massive tax cuts for the wealthy.)

The executive budget justification sections speak frequently of how various objectives would be better achieved through states and localities, without providing any funds with which they can actually do so.

Many cuts like this were proposed by the Trump administration in his first term in office as well, only to be restored, in full or in part, by Congress, though many members of the majority in this Congress seem less responsive to its constituents. Efforts to protect the various targeted programs are shifting into high gear.

#### Policy, Enforcement, and Regulatory Changes

- HUD Backing Away from Fair Housing Enforcement: According to reporting by ProPublica, <u>copublished by Shelterforce</u> on May 15, HUD has closed or halted at least 115 fair housing cases since the new administration took office, and is not pursuing charges that would previously have been brought.
- Al Rewrite of HUD Regulations: According to reporting by Wired from April 30, a college student working for DOGE has been put in charge of using Al to rewrite all HUD regulations, looking for places where the regulations go beyond the minimum that the law requires. They do, at least, appear to be asking human staffers to review the proposed changes. A massive deregulatory push was part of Project 2025's goals.
- **AFFH Rule:** On Jan. 16, HUD <u>officially withdrew</u> the proposed Affirmatively Furthering Fair Housing rule published in 2023, removing it from the regulatory agenda. On March 3, HUD published an <u>Interim Final Rule</u> that repeals the 2021 interim rule and any remaining parts of the 2015 AFFH rule within it. This returns the statute to its <u>pre-1994</u>

terminology, which entailed a general commitment by grantees to promote fair housing without specific planning requirements. The comment period for the interim rule ended on May 9. The attorneys general of 18 states, plus D.C., <u>submitted a comment</u> in opposition, calling on HUD to "withdraw the [Interim Final Rule] in its entirety" and criticizing the rule for undoing progress on fair housing.

- Mixed-Status Families: Under current HUD regulations, families whose members have different immigration statuses can live together in subsidized housing, but assistance is prorated to exclude ineligible members. A proposed rule seeks to eliminate this provision, effectively barring any family with an ineligible member from receiving housing assistance. This change would compel families to choose between separation or eviction, likely leading to increased homelessness among affected populations. Update: While HUD hasn't yet outright banned mixed-status families from federal housing, the agency has begun sharing data with the Department of Homeland Security in order to "identify illegal aliens who are ineligible for federal housing assistance and take remedial measures to end this waste and abuse, including referral for immigration enforcement actions."
- FHFA Tenant Eviction Protections: In February, the National Apartment Association, in cooperation with other rental industry groups, formally requested that the Federal Housing Finance Agency (FHFA) <u>delay the implementation of several tenant protections</u> enacted by the Biden administration. Bill Pulte, the FHFA's newly installed director, in mid-March granted that request by rescinding several tenant protections that were set to take effect for properties with loans backed by Fannie and Freddie, including:
  - 30-day written rent increase notices
  - 30-day notice of lease termination
  - 5-day minimum grace period for late rent payments
- Equal Access Rule: On Feb. 7, HUD Secretary Turner <u>announced</u> that the agency would no longer enforce the rule requiring homeless shelters to offer shelter to people based on their gender identity. The administration has since <u>proposed to revise the</u> <u>Equal Access Rule itself.</u>
- FHA Loan Eligibility: Beginning May 25, nonpermanent U.S. residents, including those protected by the Deferred Action for Childhood Arrivals, or DACA, program (often called Dreamers), became ineligible for loans backed by the Federal Housing Administration. This change also disqualified asylum seekers who don't have green cards, legal visa holders, and other temporary legal residents. The sweeping policy, which HUD called a "crackdown," eliminated a Biden-era policy that allowed Dreamers who have a valid Social Security number and legal work status to qualify. It also eliminated the "non-permanent resident" category in FHA's Title I and II loan programs.

#### **Other HUD Actions**

- HUD relaunched its website in late March, after removing 90 percent of its content, under the pretext of improving user experience. Research publication archives, recent press releases, and much more were removed, and a religious quote of Secretary Turner's was placed on the homepage.
- HUD Headquarters to Be Sold: With an April 15 executive order intended to "restore common sense to Federal office space management by freeing agencies to select cost-effective facilities and focus on successfully carrying out their missions for American taxpayers," Trump set in motion the sale of the Robert C. Weaver Federal Building, better known as the HUD Building. It's on the National Register of Historic Places. HUD Secretary Turner had already expressed his dislike of the building in a Fox interview, where he called it "the ugliest building in D.C." According to The Hill, Turner said in the interview that a change of office space would give the HUD team the kind of refresh that changing teams could do for a football player.

## **Project 2025 Goals**

- Department of Housing and Urban Development: American voters were given a preview of what would likely happen to HUD in a second Trump term: The agency's dismantling is outlined clearly in Project 2025, which includes both short- and long-term goals meant to weaken and eventually shutter the agency. So far, Trump's HUD has begun to make good on the goal of hollowing out the workforce, displacing career civil servants from leadership positions and replacing them with "politically aligned" appointees. As of mid-April, it has also moved on the goal of selling the agency's DC headquarters. Project 2025 also calls for terminating any "actions taken by the Biden Administration to advance progressive ideology," which aligns with the administration's sweeping anti-DEI actions in every branch and arm of government and includes a final rescission of the Affirmatively Furthering Fair Housing (AFFH) rule.
- Federal Housing Finance Agency/Government-Sponsored Agencies (GSEs): Project 2025 also introduced a blueprint for renovating the agencies that back the nation's mortgage market—some of which are already happening. Project 2025, for example, calls for shifting the GSEs' focus away from supporting climate and minority homeownership initiatives. It also calls for an administrative overhaul, which FHFA Director Pulte is helming. In mid-March, he wiped out 10 percent of the agency's workforce, then fired the boards of both Fannie Mae and Freddie Mac—the two GSEs FHFA oversees—installed himself as chairman, and appointed new directors, including Christopher Stanley, who resigned a day later. Pulte also put dozens of FHFA staff on administrative leave. These actions are part of a broader ambition within the Trump administration to privatize Fannie and Freddie, potentially transferring them into a sovereign-wealth fund. While some on both sides of the aisle think this is a positive move that will net investors billions, reduce government deficit, and foment desirable

market competition, critics warn of potential <u>instability in the mortgage-backed securities</u> <u>market</u> and other, wider economic implications—including a further pullback from fair housing enforcement and abandonment of the <u>Duty to Serve</u> mandate, which requires the GSEs to support underserved markets.

## New, Expanded, or Revived Initiatives

• Federal Lands for Affordable Housing: The Trump administration in mid-March created a task force that includes HUD and the Department of the Interior that will research ways to streamline the process of identifying and repurposing underutilized federal lands for housing projects. The announcement included few details about next steps, aside from promising that an "annual report will be submitted to the National Economic Council by April 15." (As of publication, the report does not appear on the NEC website—nor do any reports published after 2016.) In early May, House Republicans approved a provision to their reconciliation megabill that would have allowed the sale of thousands of acres of federal land in Nevada and Utah, igniting outrage among conservationists, watchdog groups, and Democrats—who immediately introduced legislation to block the move. By the time the House voted in favor and moved the legislation to the Senate, the provision no longer existed in the bill. Trump has also floated the idea of creating new urban areas, which he called "Freedom Cities," on federal lands, saying they'll feature advanced infrastructure and minimal regulatory constraints to attract private developers. Some worry these developments would be exempt from crucial regulatory provisions, including federal taxes, environmental rules, labor protections, etc.

# **Effects of Federal Actions in Other Areas**

Everything is connected, so actions all across the federal government affect the housing crisis. These are just a few of the most direct connections.

- AmeriCorps: On Friday, April 25, the administration sent stop work notices to organizations managing \$400 million in AmeriCorps service projects across the country. The affected projects were funded through grants to their states, and included a wide range of housing, community development, and human services projects. The order leaves tens of thousands of AmeriCorps members cut off from the work they were doing, and community projects without crucial staff. About two dozen states sued on April over the terminations, while another lawsuit was filed on May 5 by organizations that employ AmeriCorps workers. The notice follows a week after volunteers with AmeriCorps' National Civilian Community Corps, which focuses on disaster relief, were let go and about 85 percent of the AmeriCorps staff were placed on administrative leave.
- Consumer Finance Protection Bureau (CFPB): The administration is trying very hard to gut the CFPB, putting Project 2025 architect and OMB head Russell Vought at its

helm, and withdrawing dozens of enforcement actions. In one particularly stunning reversal, it <u>vacated a settlement</u> achieved during the first Trump administration, and is seeking to return the fine that the lender had already paid. <u>Court action forced the administration to reverse</u> its initial attempt to fire all staff and close the agency. The administration <u>tried again</u> to shrink the agency, sending reduction in force notices to 1,483 of the organization's 1,700 employees late on Thursday, April 17, arguing that all of its statutorily required functions could be carried out at such staffing levels, often claiming that a single person could serve as an entire required division. The judge overseeing the legal fight over how much the administration can interfere in the congressionally created agency <u>immediately halted the layoffs</u>, a decision that was upheld on **May 30**. Next stop: SCOTUS.

In early May, the agency announced intentions to <u>rescind almost 70 different</u> <u>guidance documents</u>, and withdrew from its attempts to <u>monitor Google Payments</u> or <u>enforce its Buy Now, Pay Later rule</u>.

- Deportations: The administration's crackdown on immigration enforcement and its implementation of mass deportations, while primarily causing concern on the human rights, due process, and rule of law fronts, is also already increasing labor shortages in the construction industry, in which about 30 percent of the workforce is foreign-born, with a significant portion undocumented. While the administration has claimed that deporting immigrants will make housing less expensive, most economists disagree—as does the data. A 2024 study of the effects of deporting 300,000 undocumented immigrants between 2008 and 2013 found that three years after the deportations, "the average county had built 1,997 fewer homes" and "new construction parcels were \$57,300 more expensive than they otherwise would have been," a 17 percent increase. The construction industry's reliance on immigrant labor means deportations (or the chilling effect the threat of them has) could ripple into project delays, deferred maintenance, and increased labor costs.
- Tariffs: Trump's continued flip-flopping on tariff implementation dates and levels has already sent shock waves through the housing development and construction industries. Multimillion-dollar projects on yearslong timelines can't progress when tariffs, and therefore materials and construction costs, change on a day-to-day basis. This will likely mean a slowdown in multifamily construction nationwide due to anticipated higher costs resulting (in part) from tariffs. Respondents to a March 2025 National Multifamily Housing Council survey predicted an average 4 percent increase in development costs following Trump's tariffs on lumber and steel from Canada and Mexico. Altogether, approximately 10 percent of the materials used in home construction are imported, and early estimates determined tariffs could add between \$9,000 and \$25,000 to the cost of building a new single-family home. Trump on May 30 announced plans to double steel and aluminum tariffs from 25 to 50 percent, creating more uncertainty among developers. Although the National Association of Home Builders (NAHB) hasn't yet publicly commented on the recent hike, an NAHB post from the previous day applauded the court decision to block Trump's power to impose tariffs, saying that "the on-again,"

off-again nature of the tariffs and threats of higher levies have already had a negative impact on housing affordability." Construction accounts for <u>more than 50 percent</u> of the U.S.'s steel consumption, while aluminum is increasingly used in <u>sustainable building practices</u>.

• Cuts or Threats to Medicaid, SSA, SNAP: Social Security, Medicaid, and SNAP (Supplemental Nutrition Assistance Program) keep many Americans afloat—and challenges to the programs have drawn controversy. The Social Security Administration is already stretched thin, but in late February it announced it would cut its staff from 57,000 to 50,000. Although it was previously reported that DOGE is planning to shut down nearly 50 of the agency's field offices, DOGE denied this, as did an April 29 press release by the Social Security Administration. On May 6, the Senate confirmed Frank Bisignano to lead SSA. (It's worth noting that Democrats are worried about Bisignano's connections to DOGE.) The same day, 15 House Republicans wrote to Bisignano in defense of the SSA, asking for a stop to the DOGE cuts.

In their efforts to create a reconciliation bill, House Republicans are going back and forth on huge cuts—amounting to hundreds of billions of dollars—to both <u>SNAP</u> and <u>Medicaid</u> over the next decade. It's still unclear how big those cuts will be in the final bill.

In his 2026 skinny budget proposal, Trump called to slash the funding for Centers for Medicare and Medicaid Services Program Management, claiming the change "will have no impact on providing benefits to Medicare and Medicaid beneficiaries."

- Criminalizing Homelessness: The U.S. Forest Service moved to clear an encampment
  of people in the Deschutes Forest near Bend, Oregon on May 1. Advocates say in a
  climate of rising housing costs and criminalization of homelessness, the residents have
  no other options. One month later, the Bureau of Land Management closed 40 acres of
  public land due to long-term camping by six people.
- General Unreliability of Federal Government: While the federal government has
  historically been a slow-moving behemoth of due diligence and process, Trump 2.0 has
  taken several actions that raise distinct concerns about the reliability of employment,
  civic protections, higher education autonomy, and the independence of government
  agencies. For example:
  - In mid-April, <u>Trump reinstated and expanded "Schedule F</u>," which is a reclassification of approximately 50,000 federal employees' employment categorization, making it easier to reduce or ignore their traditional civil service safeguards against issues like politically motivated terminations and whistleblower retaliation. This move aims to replace merit-based employees with new hires who are politically aligned with Trump.
  - Trump in February signed an <u>executive order</u> mandating that all federal agencies, including typically independent ones like the Federal Trade Commission and the Securities and Exchange Commission, submit their current regulations to the

- White House for review.
- In early March, the administration <u>directed federal agencies to reclassify chief human capital officer positions</u> in such a way that allows political appointees to obtain these positions, which have been traditionally filled by career civil servants.
- The Trump administration has threatened several high-profile higher education establishments with reduction in federal funding and/or removal of their tax-exempt status if they refuse to comply with White House orders to eliminate diversity, equity and inclusion initiatives and crack down on protesters supporting Palestine. Harvard University, the nation's oldest and richest university, has been featured prominently in the news since Trump froze \$2 billion of its federal funding and moved to pull its tax exemption. In late May, just weeks before graduation, Trump moved to ban international students from attending Harvard and force them to disenroll immediately. And on May 27, he announced plans to further kneecap the university by canceling all remaining contracts with it—worth an estimated \$100 million.

These ongoing threats of government instability and unreliability undermine not just the public's trust in the federal government's functionality, they stoke uncertainty and increase delays in the community development and affordable housing industries. Already operating on razor-thin margins with little flexibility to absorb developmental or operational cost increases, organizations that serve marginalized communities have few additional safety nets available if the federal government stops paying its bills.