



## The Trump Administration's Actions That Are Worsening the Fair and Affordable Housing Crisis

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The Trump Administration has engaged in a series of actions that are only worsening the fair<sup>1</sup> and affordable<sup>2</sup> housing crisis. Many of these actions are based on the Project 2025 playbook authored by The Heritage Foundation. At this point, the Administration has implemented nearly 70 percent of the playbook's housing and lending recommendations. Generally, these harmful actions fall into the following five categories:

1. Increasing housing costs for the average renter, buyer, or homeowner
2. Rolling back established housing rights for people of all backgrounds
3. Ignoring the threat to local communities from climate change
4. Eviscerating key agencies that provide people with access to fair and affordable housing
5. Jeopardizing people's data privacy and protection from unfair algorithms

Following is a more detailed list of the administration's actions that are worsening the fair and affordable housing crisis. The Project 2025 page number that corresponds to the action is shown in [brackets].

### 1-Increasing housing costs for the average renter, buyer, or homeowner

- Tariffs. The administration increased the cost of housing supplies during the nation's fair and affordable housing crisis by imposing tariffs.<sup>3</sup> (first started on 2/13/2025)
- Immigrant Labor. The administration decreased the availability of labor by attacking, detaining, and deporting immigrants who perform much-needed housing construction and engage in other

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<sup>1</sup> NFHA, *2024 Fair Housing Trends Report* (July 2024), <https://nationalfairhousing.org/resource/2024-fair-housing-trends-report/>.

<sup>2</sup> Harvard Joint Center on Housing Studies, *The State of the Nation's Housing 2025* (June 2025), <https://www.jchs.harvard.edu/state-nations-housing-2025>.

<sup>3</sup> Robert Dietz, *Builder Sentiment at Third Lowest Reading Since 2012*, National Association of Home Builders (June 17, 2025), <https://eyeonhousing.org/2025/06/builder-sentiment-at-third-lowest-reading-since-2012>; Keith Griffith, *Trump's Tariffs Are Expected to Raise New-Home Costs \$9,200*, Realtor.com (April 4, 2025), <https://www.realtor.com/news/trends/trump-tariffs-new-home-prices-homebuilders/>; Erica York, *Trump Tariffs: Tracking the Economic Impact of the Trump Trade War*, Tax Foundation.org (Feb. 13, 2025), <https://taxfoundation.org/research/all/federal/trump-tariffs-trade-war/>. See also Testimony of Buddy Hughes on Behalf of the National Association of Home Builders (NAHB Testimony), in a Hearing Titled, *Building Our Future: Increasing Housing Supply in America*, before the U.S. House Financial Services Subcommittee on Housing and Insurance (March 4, 2025), <https://docs.house.gov/meetings/BA/BA04/20250304/117970/HHRG-119-BA04-Wstate-HughesB-20250304.pdf> (stating that supply chain instability and tariffs on imported materials continue to create uncertainty for builders).

housing-related professions.<sup>4</sup> (first started on 1/20/2025) Immigrants make up one-third of the construction trades workforce and home builders are already facing an acute shortage.<sup>5</sup>

- Infrastructure Projects. The administration delayed projects that improve communities by pausing the disbursement of funds appropriated through the Inflation Reduction Act or the Infrastructure Investment and Jobs Act.<sup>6</sup> (1/20/2025)
- Performative Actions. The administration engaged in performative actions that will not lower costs, such as ordering agencies to deliver emergency housing price relief (without any authorization or funds to do so).<sup>7</sup> (1/20/2025)
- Tenant Protections. In its capacity as conservator, the Federal Housing Finance Agency (FHFA) issued an order rescinding a Directive titled, “Aligned Policies on Multifamily Rental Payment Flexibility and Lease Notices,” which required Fannie Mae and Freddie Mac to include certain tenant protections, such as rental payment flexibility and lease notices, as a condition of new multifamily financing.<sup>8</sup> (3/24/2025)
- Consumer Protection. In its capacity as conservator, FHFA issued an order rescinding guidance titled, “Advisory Bulletin No. 2024-06: Regulated Entity Unfair or Deceptive Acts or Practices Compliance,” which had articulated FHFA’s expectations for the GSEs’ and the FHLBanks’ compliance with Section 5 of the Federal Trade Commission Act, which prohibits unfair or deceptive acts or practices (UDAP).<sup>9</sup> (3/24/2025) FHFA fired the UDAP examiners, which means that the regulator will no longer supervise Fannie Mae and Freddie Mac for compliance with the UDAP law.<sup>10</sup> Each of the federal financial regulators has long supervised its regulated entities for compliance with UDAP, so this makes FHFA an outlier among the regulators and leaves everyday consumers without basic consumer protections.<sup>11</sup>
- GSE Privatization and Increased Lending Costs. Administration officials have discussed privatizing Fannie Mae and Freddie Mac, allowing them to exit conservatorship, and/or selling

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<sup>4</sup> See, e.g., Trump Administration, *Protecting the American People Against Invasion* (Jan. 20, 2025), <https://www.whitehouse.gov/presidential-actions/2025/01/protecting-the-american-people-against-invasion/>.

<sup>5</sup> National Association of Home Builders, *Concentration of Immigration in Construction Trades*, <https://www.nahb.org/advocacy/industry-issues/labor-and-employment/immigration-reform-is-key-to-building-a-skilled-workforce/concentration-of-immigration-in-construction-trades>.

<sup>6</sup> Trump Administration, *Unleashing American Energy* (Jan. 20, 2025), <https://www.whitehouse.gov/presidential-actions/2025/01/unleashing-american-energy/>.

<sup>7</sup> Trump Administration, *Delivering Emergency Price Relief for American Families and Defeating the Cost-of-Living Crisis* (Jan. 20, 2025), <https://www.whitehouse.gov/presidential-actions/2025/01/delivering-emergency-price-relief-for-american-families-and-defeating-the-cost-of-living-crisis/>.

<sup>8</sup> FHFA, *Order Rescinding Directive on Multifamily Lease Policies*, Order Nos. 2025-OR-FNMA-13, 2025-OR-FHLMC-13 (March 24, 2025), <https://x.com/pulte/status/1904282014582264283>.

<sup>9</sup> FHFA, *Order Rescinding Advisory Bulletin No. 2024-06: Regulated Entity Unfair or Deceptive Acts or Practices Compliance*, Order Nos. 2025-OR-FNMA-2, 2025-OR-FHLMC-2, 2025-OR-B-2 (March 24, 2025), <https://x.com/pulte/status/1904283306603982858>.

<sup>10</sup> Eric Katz, *Housing Agencies Begin Closing Offices, Escorting Employees Out*, Government Executive (March 19, 2025), <https://www.govexec.com/workforce/2025/03/housing-agencies-begin-closing-offices-escorting-employees-out/403903/>.

<sup>11</sup> See, e.g., Board of Governors of the Federal Reserve and Federal Deposit Insurance Corporation, *Unfair or Deceptive Acts or Practices by State-Chartered Banks* (March 11, 2004), <https://www.federalreserve.gov/boarddocs/press/bcreg/2004/20040311/attachment.pdf>.

off stock in Fannie Mae and Freddie Mac.<sup>12</sup> Experts predict that privatization is likely to cause interest rates to rise and rate-lock agreements to evaporate as the explicit government backstop is rolled back, driving up housing costs for middle-class families.<sup>13</sup> [706]

- Foreclosure Protections for Veterans. The U.S. Department of Veterans Affairs (VA) discontinued the Veterans Affairs Servicing Purchase (VASP) program, the only VA mortgage assistance option that currently helps the vast majority of borrowers obtain an affordable payment when they are delinquent on their mortgage.<sup>14</sup> (4/23/2025) This action dramatically increases the risk of foreclosure for tens of thousands of veterans and their families.
- Medical Debt on Credit Reports. As of June 2023, 15 million people had more than \$49 billion in outstanding medical debt on their credit reports.<sup>15</sup> The 15 million Americans disproportionately live in the South and low-income communities. Unlike other forms of debt, medical debt has little predictive value for a consumer's ability to repay their other financial debts. In January 2025, the CFPB issued a rule prohibiting the inclusion of medical bills on credit reports and requiring credit reporting companies to remove medical bills and information from credit reports, as originally mandated by law.<sup>16</sup> In April 2025, the CFPB and two industry associations filed a joint motion in federal district court to vacate the rule, which the court granted.<sup>17</sup> (7/15/2025) After several states issued laws banning the reporting of medical debt on credit reports, the CFPB issued an interpretive rule stating that the Fair Credit Reporting Act preempts those laws.<sup>18</sup> (10/28/2025)
- GSE Affordable Housing Goals. Congress passed the Affordable Housing Goals in the 1992 Safety and Soundness Act, and updated them in the 2008 Housing and Economic Recovery Act, as a key tool to keep Fannie Mae and Freddie Mac focused on their public mission. In October 2025, FHFA issued proposed rule changing the Affordable Housing Goals for single family

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<sup>12</sup> Sylvan Lane, *Fannie, Freddie Chief Teases IPO*, The Hill (Oct. 20, 2025), <https://thehill.com/newsletters/business-economy/5564325-fannie-freddie-chief-teases-ipo/>.

<sup>13</sup> Erik J. Martin, *Mortgages Under Trump: What Happens if He Privatizes Fannie Mae and Freddie Mac?*, U.S. News, (May 22, 2025), <https://money.usnews.com/loans/mortgages/articles/mortgages-under-trump-what-happens-if-he-privatizes-fannie-mae-and-freddie-mac>; Ronda Kaysen, *What Will It Mean for Homebuyers If Fannie Mae and Freddie Mac Go Private*, N.Y. Times (April 2, 2025), <https://www.nytimes.com/2025/03/26/realestate/fannie-mae-freddie-mac-loans-pulte.html>.

<sup>14</sup> VA, *Veterans Affairs Servicing Purchase (VASP) Program Wind Down*, Circular 26-25-2 (4/23/2025), <https://www.benefits.va.gov/HOMELOANS/documents/circulars/26-25-02.pdf>; NFHA Press Release, *Advocates, Members of House Committee on Veterans Affairs Respond to Housing Cuts for Veterans*, <https://nationalfairhousing.org/advocates-members-of-house-committee-on-veterans-affairs-respond-to-housing-cuts-for-veterans/>.

<sup>15</sup> CFPB, *CFPB Finds 15 Million Americans Have Medical Bills on Their Credit Reports* (Apr. 29, 2024), <https://www.consumerfinance.gov/about-us/newsroom/cfpb-finds-15-million-americans-have-medical-bills-on-their-credit-reports/#:~:text=As%20of%20June%202023%2C%20about,below%203%25%20in%20June%202023>.

<sup>16</sup> CFPB, *CFPB Finalizes Rule to Remove Medical Bills from Credit Reports* (1/7/2025), <https://www.consumerfinance.gov/about-us/newsroom/cfpb-finalizes-rule-to-remove-medical-bills-from-credit-reports/>.

<sup>17</sup> Ken Alltucker, *Medical Debt Remains on Credit Reports after Biden-Era Rule Tossed by Judge*, USA Today (July 15, 2025), <https://www.usatoday.com/story/money/2025/07/15/biden-medical-debt-rule-tossed-trump/85205733007/>.

<sup>18</sup> CFPB: *Federal Law Preempts State Law on Credit Reporting*, ABA Banking Law Journal (Oct. 28, 2025), <https://bankingjournal.aba.com/2025/10/cfpb-federal-law-preempts-state-law-on-credit-reporting/>.

housing in a manner that will take away affordable mortgages for up to 177,000 lower- to moderate-income families over the next three years, worsening the housing affordability crisis and fueling deeper racial and socioeconomic inequalities in who can access credit and become a first-time homeowner.<sup>19</sup> (10/2/2025)

- Community Development Financial Institutions (CDFIs). The administration used illegal Reduction-In-Force procedures during the shutdown to terminate all of the Treasury Department's CDFI Fund staff. (10/10/2025) The CDFI Fund and the community financial institutions they serve are an essential and vital source of capital and financial services to underserved communities across the United States that traditional financial institutions historically don't serve as well, including in urban and rural communities.<sup>20</sup>
- Housing Counselors. In the past, HUD has funded, certified, and trained over 4,200 housing counselors who offer expert, confidential advice that is usually free or very low cost, to help consumers rebuild their credit or become more financially stable, prevent homelessness, avoid eviction or foreclosure, recover from disasters, or prepare for homeownership.<sup>21</sup> In October 2025, the administration ordered the layoffs of *all but one person* (the statutorily mandated Director) in HUD's housing counseling program.<sup>22</sup>(10/2025)
- Public Housing Limits. HUD has drafted rules to allow local housing authorities and landlords to impose time limits and work requirements for tenants under any of the four following programs: public housing, House Choice Vouchers, Project-Based Vouchers, and Project-Based Rental Assistance.<sup>23</sup> (9/2025) This action would weaken the social safety net amid record-high housing costs, causing hardship for millions of people across the country.

## 2-Rolling back established housing rights for people of all backgrounds

### Rolling back established housing rights for people of color, women, people with disabilities, domestic violence survivors, & others

- Diversity, Equity, Inclusion, Accessibility. The administration attacked basic civil rights protections under the guise of terminating "'diversity, equity, inclusion, and accessibility' (DEIA) mandates, policies, programs, preferences, [positions], and activities in the Federal Government"

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<sup>19</sup> FHFA, *Proposed Rule: 2026-2028 Affordable Housing Goals* (Oct. 2, 2025), <https://www.federalregister.gov/documents/2025/10/02/2025-19428/2026-2028-enterprise-housing-goals>.

<sup>20</sup> House Financial Services Committee Democrats, *Letter to Treasury and Office of Management and Budget regarding CDFI Fund Staff* (Oct. 27, 2025), [https://democrats-financialservices.house.gov/uploadedfiles/10.27.2025\\_ltr\\_bandv\\_cdfi\\_rifs.pdf](https://democrats-financialservices.house.gov/uploadedfiles/10.27.2025_ltr_bandv_cdfi_rifs.pdf).

<sup>21</sup> Sharon Cornelissen, *Frontline Workers in a Housing Crisis: The Administration's Attacks on HUD Housing Counselors*, Consumer Federation of America Blog (Oct. 24, 2025), <https://consumerfed.org/frontline-workers-in-a-housing-crisis-the-administrations-attacks-on-hud-housing-counselors/>.

<sup>22</sup> Janie Har, *Judge Temporarily Blocks the Trump Administration from Firing Workers during the Government Shutdown*, Associated Press (Oct. 15, 2025), <https://apnews.com/article/government-shutdown-layoffs-trump-unions-b312b3ca77cbdbc72e778ece3b2cbffc>.

<sup>23</sup> Jesse Coburn, *Millions Could Lose Housing Aid under Trump Plan*, ProPublica (Sept. 29, 2025), <https://www.propublica.org/article/trump-housing-reforms-aid-hud-immigration-homelessness>.

while also erasing the existence of transgender people.<sup>24</sup> (1/20/2025) These actions will undermine housing and credit opportunities for the consumers of America. [561-562, 584, 586]

- Fair Housing Grants. Created in 1987 under the Reagan Administration and funded by Congress annually ever since, the Fair Housing Initiatives Program (FHIP) is a grant program that provides localized assistance to people who face housing and lending discrimination. Organizations receiving FHIP grants field and resolve over 75 percent of fair housing complaints—about three times as many as all state and federal agencies combined—and they are also the primary means by which the federal government educates the public about their fair housing rights and responsibilities. In February 2025, HUD abruptly terminated 78 grant contracts, adversely impacting these agencies' ability to provide essential assistance to vulnerable populations, reinstating them a month later only after being sued.<sup>25</sup> (2/27/2025) Then HUD delayed awarding new grants and allowing existing grants to continue into the next year, continuing the funding crisis it inflicted on the nation's local fair housing organizations. After being sued again, HUD finally planned to announce a new round of grant funding to fair housing organizations on September 30, 2025, the last day of the fiscal year.<sup>26</sup> (9/30/2025) But because of HUD's unjustifiable delay in awarding the grants, HUD had no time to do the paperwork to start the grants before the government shut down in October, preventing fair housing organizations from beginning work. That means community-based fair housing groups cannot provide assistance to families fleeing domestic violence, disabled veterans looking for permanent housing, first-generation, first-time homebuyers seeking fair and affordable mortgages, and others who are protected from discrimination by the nation's fair housing laws. The future of these grants remains unclear. By eviscerating the federal agencies that oversee fair housing as well as

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<sup>24</sup> Trump Administration, *Ending Radical and Wasteful DEI Programs and Preferencing* (Jan. 20, 2025), <https://www.whitehouse.gov/presidential-actions/2025/01/ending-radical-and-wasteful-government-dei-programs-and-preferencing/>; NFHA, *Civil and Human Rights Organizations Sue Trump Administration Over Executive Orders Banning Diversity, Equity, Inclusion, Accessibility, and Erasing Transgender People* (Feb. 19, 2025), <https://nationalfairhousing.org/civil-and-human-rights-organizations-sue-trump-administration-over-executive-orders-banning-diversity-equity-inclusion-accessibility-and-erasing-transgender-people/>; NFHA, *Elimination of Federal Diversity, Equity, and Inclusion Programs Threatens Economic Stability and National Security* (Jan. 22, 2025), <https://nationalfairhousing.org/elimination-of-federal-diversity-equity-and-inclusion-programs-threatens-economic-stability-and-national-security/>; NFHA, *Civil and Human Rights Organizations Continue to Fight against Trump Administration's Anti-Equity and Transgender Erasure Executive Orders Despite Denial of Preliminary Injunction* (May 5, 2025), <https://nationalfairhousing.org/civil-and-human-rights-organizations-continue-to-fight-against-trump-administrations-anti-equity-and-transgender-erasure-executive-orders-despite-denial-of-preliminary-injunction/>.

<sup>25</sup> Rachel Siegel, *HUD Cuts Might Hamper Government Efforts to Stop Housing Discrimination*, Washington Post (April 6, 2025), <https://www.washingtonpost.com/business/2025/04/06/fair-housing-enforcement-hud-cuts/>; Jennifer Ludden, *HUD Choked Funding to Enforce Fair Housing Laws. Legal Aid Groups May Not Survive*, NPR (March 15, 2025), <https://www.npr.org/2025/03/15/nx-s1-5325936/hud-funding-fair-housing-laws-legal-aid-groups-scott-turner>.

<sup>26</sup> NFHA, *The Federal Government Shutdown Exacerbates Harm of HUD's Dismantling of Its Fair Housing Infrastructure* (Sept. 30, 2025), <https://nationalfairhousing.org/the-federal-government-shutdown-exacerbates-harm-of-huds-dismantling-of-its-fair-housing-infrastructure/>; NFHA, *Federal Judge Grants Temporary Restraining Order in Lawsuit against HUD for Withholding Fair Housing Funds* (July 29, 2025), <https://nationalfairhousing.org/federal-judge-grants-temporary-restraining-order-in-lawsuit-against-hud-for-withholding-fair-housing-funds/>.

jeopardizing the funding for community-based fair housing organization, the administration has decimated the promise of fair housing opportunities for all.<sup>27</sup>

- HUD Complaint Portal. Under the Fair Housing Act, HUD is required to provide a means for the members of the public to submit complaints of housing discrimination for administrative investigation and adjudication.<sup>28</sup> However, HUD will now only accept housing discrimination complaints submitted through its online portal.<sup>29</sup> Complaints will no longer be accepted via email, mail, telephone, or in-person submissions. Additionally, regional hotlines, intake numbers (available in both English and Spanish), and email addresses previously used for filing complaints have been discontinued. (3/15/2025) These changes are likely to severely impede the ability of people with disabilities, people with limited English proficiency, and people with limited internet access to secure their right to fair housing.
- Affirmatively Furthering Fair Housing. The Fair Housing Act requires all federal agencies to administer their housing and urban development programs in a manner affirmatively to further fair housing (AFFH).<sup>30</sup> However, in March 2025, HUD issued a watered-down Interim Final Rule, which weakens the AFFH mandate and removes key tools from states and localities, despite many of them requesting HUD's guidance.<sup>31</sup> HUD Secretary Scott Turner stated, "We have to save our suburbs....We are taking the [AFFH Rule] down today so that we could restore our suburbs."<sup>32</sup> The Secretary's remarks seemed to harken back to a time of rigid residential segregation when all-White suburbs held the highest value regardless of the creditworthiness of the borrower or the condition of the home. The remarks also disregard the growing problem that the lack of affordable housing supply is causing in rural communities nationwide.
- Federal Lands. HUD and the Department of Interior created a Joint Task Force on Federal Land for Housing to identify federal lands for affordable housing.<sup>33</sup> (3/17/2025) HUD rescinded meaningful regulations to affirmatively further fair housing, so there is no framework to ensure that the affordable housing developments will be part of inclusive, thriving communities with good jobs, schools, and transportation or will further isolate the people who need access to affordable housing. [508]
- Appraisal Modernization. In May of 2024, Fannie Mae, Freddie Mac, and HUD's FHA published requirements for a consumer-initiated Reconsideration of Value (ROV) that promotes consistency for all consumers when a perceived appraisal issue and/or appraisal deficiency

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<sup>27</sup> NFHA, *NFHA Denounces Trump Administration's Firing of Hundreds of HUD Employees during Government Shutdown* (Oct. 14, 2025), <https://nationalfairhousing.org/nfha-denounces-trump-administrations-firing-of-hundreds-of-hud-employees-during-government-shutdown/>.

<sup>28</sup> 42 U.S.C. § 3610.

<sup>29</sup> Jesse Coburn, *How the Trump Administration Is Weakening the Enforcement of Fair Housing Laws*, ProPublica (May 15, 2025), <https://www.propublica.org/article/trump-hud-weakening-enforcement-fair-housing-laws>.

<sup>30</sup> 42 U.S.C. § 3608(d).

<sup>31</sup> HUD, Interim Final Rule, *Affirmatively Furthering Fair Housing Revisions*, 90 Fed. Reg. 11020 (March 3, 2025), <https://www.federalregister.gov/documents/2025/03/03/2025-03360/affirmatively-furthering-fair-housing-revisions>;

<sup>32</sup> HUD Secretary Scott Turner, Interview on Fox Business, *Secretary Turner Repeals Biden AFFH 'Zoning Tax'* (Feb. 26, 2025), <https://www.youtube.com/watch?v=xzTT9cEM6fY>.

<sup>33</sup> HUD, *HUD Secretary Scott Turner and DOI Secretary Doug Burgum Announce Joint Task Force to Use Federal Lands for Affordable Housing* (March 17, 2025), <https://www.hud.gov/news/hud-no-25-042>.

exists, including potential appraisal discrimination.<sup>34</sup> In March 2025, HUD's FHA rescinded its policies that clarified the application of the Fair Housing Act to appraisal discrimination and established standards for FHA lenders to follow in connection with a consumer's request for Reconsideration of Value (ROV).<sup>35</sup> (3/19/2025) In September 2025, HUD withdrew guidance providing support for the Fair Housing Act's coverage of appraisal discrimination.<sup>36</sup> (9/16/2025) [558] This will make it harder for consumers to fairly access the full equity of their homes. [508]

- Special Purpose Credit Programs (SPCP)/Down Payment Assistance. In its capacity as conservator, FHFA issued an order requiring Fannie Mae and Freddie Mac to "terminate SPCP Programs supported by the Enterprises."<sup>37</sup> (3/25/2025) SPCP's are authorized by law under the Equal Credit Opportunity Act and Regulation B.<sup>38</sup> This order does not (and cannot) ban lenders' ability to originate SPCPs but will severely restrict liquidity for SPCPs, which typically overcome historic barriers to homeownership by providing down payment assistance and flexible underwriting for certain underserved geographic areas. In September 2025, HUD withdrew guidance providing support for SPCPs under the Fair Housing Act.<sup>39</sup> (9/17/2025) In November 2025, the CFPB issued a proposed rule that would make it nearly impossible for lenders to issue SPCPs.<sup>40</sup> (11/13/2025) [558]
- Fannie Mae/Freddie Mac Equitable Housing Finance Plans. FHFA finalized the regulation for the Equitable Housing Finance Plans in 2024.<sup>41</sup> However, in March 2025, in its regulatory capacity, FHFA issued a regulatory waiver of the requirements for Fannie Mae, Freddie Mac, and the Federal Home Loan Banks (GSEs) to submit and publish Equitable Housing Finance Plans.<sup>42</sup> (3/25/2025) The waiver does not require the GSEs to stop any of the initiatives started in

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<sup>34</sup> Fannie Mae Selling Guide Announcement, SEL-2024-03 (May 1, 2024), <https://singlefamily.fanniemae.com/media/39081/display>; Freddie Mac Single Family Bulletin, 2024-06 (May 1, 2024), [https://guide.freddiemac.com/ci/okcsFattach/get/1009248\\_7](https://guide.freddiemac.com/ci/okcsFattach/get/1009248_7).

<sup>35</sup> HUD, *Rescinding Multiple Appraisal Policy Related Mortgagee Letters*, Mortgagee Letter 2025-08 (March 19, 2025), <https://www.hud.gov/sites/default/files/OCHCO/documents/2025-08hsgml.pdf>.

<sup>36</sup> Lori Summerfield and Chris Willis, *HUD's New Direction in Fair Housing Act Enforcement and Rescission of Certain FHEO Guidance*, Troutman Pepper Locke Consumer Financial Services Law Monitor (Sept. 29, 2025), <https://www.consumerfinancialserviceslawmonitor.com/2025/09/huds-new-direction-in-fair-housing-act-enforcement-and-rescission-of-certain-office-of-fair-housing-and-equal-opportunity-guidance/>. Withdrawn guidance includes: *Statement of Interest: Connolly v. Lanham* (March 13, 2023); *Appraisal Elements of Proof* (May 6, 2022).

<sup>37</sup> FHFA, *Order Issuing Directive to Terminate Special Purpose Credit Programs*, Decision No. 2025-145 (March 25, 2025), [https://x.com/pulte/status/1904621959213965690?ref\\_src=twsrc%5Egoogle%7Ctwcamp%5Eserp%7Ctwgr%5Etweet](https://x.com/pulte/status/1904621959213965690?ref_src=twsrc%5Egoogle%7Ctwcamp%5Eserp%7Ctwgr%5Etweet).

<sup>38</sup> 15 U.S.C. § 169(c); 12 C.F.R. § 1002.8. See also National Fair Housing Alliance and Mortgage Bankers Association, *Special Purpose Credit Programs Toolkit*, <https://spcptoolkit.com/>.

<sup>39</sup> Lori Summerfield and Chris Willis, *HUD's New Direction in Fair Housing Act Enforcement and Rescission of Certain FHEO Guidance*, Troutman Pepper Locke Consumer Financial Services Law Monitor (Sept. 29, 2025), <https://www.consumerfinancialserviceslawmonitor.com/2025/09/huds-new-direction-in-fair-housing-act-enforcement-and-rescission-of-certain-office-of-fair-housing-and-equal-opportunity-guidance/>.

<sup>40</sup> CFPB, *Proposed Rule: Equal Credit Opportunity Act (Regulation B)*, 90 Fed. Reg. 50901 (Nov. 13, 2025), <https://www.govinfo.gov/content/pkg/FR-2025-11-13/pdf/2025-19864.pdf>.

<sup>41</sup> 12 C.F.R. Part 1293.

<sup>42</sup> FHFA, *Regulatory Waiver of Enterprise Equitable Housing Finance Planning Requirements*, 2025-W-4 (March 25, 2025), <https://x.com/pulte/status/1904633180604481753>.

connection with the Plans (e.g., appraisal modernization), except for SPCPs, but severely restricts the transparency and accountability needed for the public to determine whether the GSE's are fulfilling their statutory mandate to serve the whole of the housing market. In July 2025, FHFA issued a Proposed Rule to repeal the regulation regarding fair lending and equitable housing finance plans.<sup>43</sup> (7/28/2025) In February 2026, FHFA finalized its rule repealing the regulation regarding fair lending and equitable housing finance plans.<sup>44</sup> (2/6/2026) [561-562]

- REO Repairs. In its capacity as conservator, FHFA issued an order requiring Fannie Mae to end its "Repair All" strategy for its REO inventory and to return to a portfolio neutral approach.<sup>45</sup> (3/25/2025) This raises questions about whether Fannie Mae will repair homes in communities of color or create blight and drive down prices in certain communities.
- Redlining. This administration has repeatedly sent the message that it will no longer protect communities who are unfairly denied access to credit on the basis of race or ethnicity. In March 2025, the CFPB joined with a defendant (Townstone Financial) to ask a federal court to vacate the agency's own settlement that resolved allegations of redlining in Chicago and refund the civil penalty to the defendant; the case had been upheld by the Seventh Circuit.<sup>46</sup> (3/26/2025) The federal court denied the CFPB's motion.<sup>47</sup> (6/12/2025) In July 2025, another federal court rejected the administration's attempt to terminate a consent order holding a bank accountable for alleged redlining in Philadelphia.<sup>48</sup> (7/24/2025) In September 2025, HUD issued guidance stating that the Fair Housing Act only protects individuals, not groups, and rescinded its guidance on redlining.<sup>49</sup> (9/16/2025) In November 2025, the CFPB issued a proposed rule that

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<sup>43</sup> FHFA, *Repeal of Fair Lending, Fair Housing, and Equitable Housing Finance Plans Regulation Proposed Rule*, 90 Fed. Reg. 35475 (July 28, 2025), <https://www.govinfo.gov/content/pkg/FR-2025-07-28/pdf/2025-14183.pdf>.

<sup>44</sup> NFHA, *Statement from the National Fair Housing Alliance on FHFA's Repeal of its Fair Lending Rule* (February 10, 2026), [Statement from the National Fair Housing Alliance on FHFA's Repeal of its Fair Lending Rule](https://www.nfha.org/statement-from-the-national-fair-housing-alliance-on-fhfa-s-repeal-of-its-fair-lending-rule) - NFHA

<sup>45</sup> FHFA, *Order Issuing Directive Terminating "Repair All" REO Strategy*, Decision No. 2025-144 (March 25, 2025), [https://x.com/pulte/status/1904621815563215008?ref\\_src=twsrc%5Egoogle%7Ctwcamp%5Eserp%7Ctwgr%5Etweet](https://x.com/pulte/status/1904621815563215008?ref_src=twsrc%5Egoogle%7Ctwcamp%5Eserp%7Ctwgr%5Etweet); NFHA Press Release, *NFHA Reaches Historic Settlement with Fannie Mae* (Feb. 7, 2022), <https://nationalfairhousing.org/nfha-reaches-historic-settlement-with-fannie-mae/>.

<sup>46</sup> Consumer Federal of America, *By Vacating Townstone, the CFPB Prolongs Its March Madness* (March 28, 2025), <https://consumerfed.org/by-vacating-townstone-the-cfpb-prolongs-its-march-madness/>.

<sup>47</sup> NFHA, *Judge Rejects Trump Administration's Effort to Abandon Redlining Settlement with Townstone Financial Inc.* (June 12, 2025), <https://nationalfairhousing.org/judge-rejects-trump-administrations-efforts-to-abandon-redlining-settlement-with-townstone-financial-inc/>; NFHA Press Release, *Civil Rights and Consumer Protection Groups Urge Court to Reject the Trump Administration's Unprecedented Attempt to Abandon Redlining Settlement with Townstone Financial, Inc.* (April 7, 2025), <https://nationalfairhousing.org/civil-rights-and-consumer-protection-groups-urge-court-to-reject-the-trump-administrations-unprecedented-attempt-to-abandon-redlining-settlement-with-townstone-financial-inc/>.

<sup>48</sup> NFHA, *Holding the DOJ Accountable to Remedy Alleged Redlining in Philadelphia, PA* (July 25, 2025), <https://nationalfairhousing.org/holding-the-department-of-justice-accountable-to-remedy-alleged-redlining-in-philadelphia-pa/>.

<sup>49</sup> Lori Summerfield and Chris Willis, *HUD's New Direction in Fair Housing Act Enforcement and Rescission of Certain FHEO Guidance*, Troutman Pepper Locke Consumer Financial Services Law Monitor (Sept. 29, 2025), <https://www.consumerfinancialserviceslawmonitor.com/2025/09/huds-new-direction-in-fair-housing-act-enforcement-and-rescission-of-certain-office-of-fair-housing-and-equal-opportunity-guidance/>.

would undermine the definition of “discouragement” under the Equal Credit Opportunity Act and make it nearly impossible to bring redlining cases.<sup>50</sup> [558]

- **Disparate Impact.** In April 2025, the administration issued an Executive Order instructing agencies to disregard the longstanding theory of disparate impact liability,<sup>51</sup> even though this theory was upheld by the Supreme Court in 2015 and remains the law of the land.<sup>52</sup> (4/23/2025) In July 2025, a press report revealed that HUD was closing at least seven major housing discrimination investigations that relied in whole or in part on the disparate impact theory of discrimination, which requires use of the least discriminatory approach to achieve a business objective.<sup>53</sup> In August 2025, HUD sent to the Office of Management and Budget (OMB) a “Final Rule” entitled “HUD’s Implementation of the Fair Housing Act’s Disparate Impact Standard,” which is likely to substantially weaken the rule.<sup>54</sup> (8/5/2025) HUD has withdrawn guidance regarding the use of disparate impact in Fair Housing Act cases and the use of arrest records in housing decisions where they may have an illegal disparate impact.<sup>55</sup> (9/16/2025) In November 2025, the CFPB issued a proposed rule that would eviscerate the definition of “disparate impact” under the Equal Credit Opportunity Act.<sup>56</sup> In January 2026, HUD issued a proposed rule entitled “HUD’s Implementation of the Fair Housing Act’s Disparate Impact Standard,” that would severely weaken HUD’s disparate impact rule.<sup>57</sup> (1/14/2026) [72, 334-336, 583, 558]
- **Domestic Violence Survivors.** In recent years, HUD has protected survivors of domestic violence from being denied housing assistance when attempting to escape a stalker or abuser. About 500 women a year reach out to HUD to request help under the Violence Against Women Act, but

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<sup>50</sup> CFPB, *Proposed Rule: Equal Credit Opportunity Act (Regulation B)*, 90 Fed. Reg. 50901 (Nov. 13, 2025), <https://www.govinfo.gov/content/pkg/FR-2025-11-13/pdf/2025-19864.pdf>.

<sup>51</sup> Trump Administration, *Restoring Equality of Opportunity and Meritocracy* (April 23, 2025), <https://www.whitehouse.gov/presidential-actions/2025/04/restoring-equality-of-opportunity-and-meritocracy/>.

<sup>52</sup> *Texas Department of Housing and Community Affairs v. Inclusive Communities Project*, 576 U.S. 519 (2015).

<sup>53</sup> Jesse Coburn, *Trump Administration Prepares to Drop at Least Seven Major Housing Discrimination Cases*, ProPublica (July 18, 2025), <https://www.propublica.org/article/trump-hud-drop-housing-discrimination-cases-housing-pollution>; NFHA, *Leading Civil Rights Organizations Urge HUD to Uphold Fair Housing Protections Against Disparate Impact Rollbacks* (Aug. 5, 2025), <https://nationalfairhousing.org/leading-civil-rights-organizations-urge-hud-to-uphold-fair-housing-protections-against-disparate-impact-rollbacks/>.

<sup>54</sup> NFHA, *Advocates Strongly Urge Trump Administration to Uphold Rule That Advances Justice and Fairness for All* (Sept. 11, 2025), <https://nationalfairhousing.org/advocates-strongly-urge-trump-administration-to-uphold-rule-that-advances-justice-and-fairness-for-all/>.

<sup>55</sup> Lori Summerfield and Chris Willis, *HUD’s New Direction in Fair Housing Act Enforcement and Rescission of Certain FHEO Guidance*, Troutman Pepper Locke Consumer Financial Services Law Monitor (Sept. 29, 2025), <https://www.consumerfinancialserviceslawmonitor.com/2025/09/huds-new-direction-in-fair-housing-act-enforcement-and-rescission-of-certain-office-of-fair-housing-and-equal-opportunity-guidance/>. Withdrawn guidance includes: *Proving Disparate Impact in Fair Housing Cases After Inclusive Communities* (Aug. 1, 2016); *OGC Guidance Application of Fair Housing Act Standards to Use of Criminal Records* (April 4, 2016); *Guidance for PHAs and Owners of Federally-Assisted Housing on Excluding the Use of Arrest Records in Housing Decisions* (Nov. 2, 2015) *Memo – Use of Arrest Records of Tenants of Public and HUD-Assisted Housing* (April 8, 2015).

<sup>56</sup> CFPB, *Proposed Rule: Equal Credit Opportunity Act (Regulation B)*, 90 Fed. Reg. 50901 (Nov. 13, 2025), <https://www.govinfo.gov/content/pkg/FR-2025-11-13/pdf/2025-19864.pdf>.

<sup>57</sup> NFHA, *174 National, State, and Local Organizations Demand HUD Preserves Key Rule to Protect People from Housing and Lending Discrimination* (February 17, 2026), [174 National, State, and Local Organizations Demand HUD Preserves Key Rule to Protect People from Housing and Lending Discrimination - NFHA](https://www.nfha.org/174-national-state-and-local-organizations-demand-hud-preserves-key-rule-to-protect-people-from-housing-and-lending-discrimination)

now only two lawyers with experience with the law remain in HUD's fair housing office.<sup>58</sup> (9/2025) In addition, the administration has shuttered the DOJ's grant-making offices, furloughing employees who help provide federal support to organizations that aid victims of domestic violence.<sup>59</sup> (10/2025) The actions will imperil survivors, advocates, and law enforcement.

- Reasonable Accommodation. HUD withdrew guidance for cases involving reasonable accommodations for people with disabilities.<sup>60</sup> (9/17/2025) [558]

### Rolling back established housing rights for LGBTQ+ individuals

- Sexual Orientation/Gender Identity. In January 2025, the administration issued an executive order that purported to terminate LGBTQ+ people's rights by limiting the definition of "sex" to two unchangeable sexes (male and female).<sup>61</sup> (1/20/2025) [451, 584, 586]
- Equal Access Rule. In February 2025, HUD issued an order to halt any pending or future enforcement actions related to HUD's 2016 Equal Access Rule,<sup>62</sup> which ensured equal access to HUD-assisted or HUD-insured housing without regard to actual or perceived sexual orientation, gender identity, or marital status. In the announcement, HUD Secretary Scott Turner stated that this approach "means getting the government out of the way of what the Lord established from the beginning when he created man in His own image."<sup>63</sup> (2/7/2025) HUD also has a proposed rule regarding the Equal Access Rule, which is pending at OMB and which could further erode the housing protections for LGBTQ+ people. [451, 584, 586]

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<sup>58</sup> Debra Kamin, *Trump Appointees Roll Back Enforcement of Fair Housing Laws*, NY Times (Sept. 22, 2025), <https://www.nytimes.com/2025/09/22/realestate/trump-fair-housing-laws.html>.

<sup>59</sup> Eli Stokol, *DOJ Furloughs Could Impact Domestic Violence Grants, Some Fear*, Politico (Oct. 4, 2025), <https://www.politico.com/news/2025/10/04/doj-furloughs-could-impact-domestic-violence-grants-some-fear-thats-the-point-00594256>.

<sup>60</sup> Lori Summerfield and Chris Willis, *HUD's New Direction in Fair Housing Act Enforcement and Rescission of Certain FHEO Guidance*, Troutman Pepper Locke Consumer Financial Services Law Monitor (Sept. 29, 2025), <https://www.consumerfinancialserviceslawmonitor.com/2025/09/huds-new-direction-in-fair-housing-act-enforcement-and-rescission-of-certain-office-of-fair-housing-and-equal-opportunity-guidance/>. Withdrawn guidance includes: *FHEO Notice 2013-01: Service Animals and Assistance Animals for People with Disabilities in Housing and HUD-funded Programs* (April 25, 2013); *FHEO 2020-01: Assessing a Person's Request to Have an Animal as a Reasonable Accommodation Under the Fair Housing Act* (Jan. 28, 2020).

<sup>61</sup> Trump Administration, *Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government* (Jan. 20, 2025), <https://www.whitehouse.gov/presidential-actions/2025/01/defending-women-from-gender-ideology-extremism-and-restoring-biological-truth-to-the-federal-government/>; NFHA, *Civil and Human Rights Organizations Sue Trump Administration Over Executive Orders Banning Diversity, Equity, Inclusion, Accessibility, and Erasing Transgender People* (Feb. 19, 2025), <https://nationalfairhousing.org/civil-and-human-rights-organizations-sue-trump-administration-over-executive-orders-banning-diversity-equity-inclusion-accessibility-and-erasing-transgender-people/>; NFHA, *Elimination of Federal Diversity, Equity, and Inclusion Programs Threatens Economic Stability and National Security* (Jan. 22, 2025), <https://nationalfairhousing.org/elimination-of-federal-diversity-equity-and-inclusion-programs-threatens-economic-stability-and-national-security/>.

<sup>62</sup> 24 C.F.R. § 5.106.

<sup>63</sup> HUD, *Secretary Scott Turner Halts Enforcement Actions of HUD's Gender Identity Rule* (Feb. 7, 2025), [https://www.hud.gov/press/press\\_releases\\_media\\_advisories/hud\\_no\\_25\\_026](https://www.hud.gov/press/press_releases_media_advisories/hud_no_25_026).

- HUD Cases. HUD now turns away cases that allege housing discrimination on the basis of sexual orientation or gender identity, stating that HUD does not view those cases as covered by the Fair Housing Act.<sup>64</sup> (5/2025) HUD has deprioritized cases based on “gender identity,” stating that it is a “novel and tenuous” legal theory and has withdrawn related guidance.<sup>65</sup> (9/16/2025) [558]

### Rolling back established housing rights for immigrants

- HUD/ICE Collaboration. HUD and the Department of Homeland Security (DHS) entered into a Memorandum of Understanding to collaborate to identify undocumented immigrants who are ineligible for Federal housing assistance and take remedial actions, including referral for immigration enforcement action.<sup>66</sup> (3/24/2025) These and other DHS actions are designed to use agency data to target immigrants and erode their feeling of safety and security in their homes.
- FHA Mortgages for DACA Recipients. HUD eliminated the non-permanent resident category from FHA’s Single Family Title I and Title II programs (which applied to DACA, pending asylum, pending refugee status, and H1-B immigrants).<sup>67</sup> (3/26/2025) Although HUD’s Press Release framed this action as preventing undocumented immigrants from accessing FHA mortgage benefits, FHA has never allowed undocumented immigrants to access those loans. In fact, the non-permanent resident category was established under HUD Secretary Ben Carson, who was appointed by the Trump Administration.<sup>68</sup> [509]
- USDA Loans for Non-Citizens. USDA rescinded its policy that provided temporary eligibility for non-Citizens with social security numbers and work authorization to apply for its Single Family Housing Guaranteed Loan Program.<sup>69</sup> (3/18/2025) The temporary eligibility was provided in 2022 because the existing categories of eligible immigration statuses did not include some categories of immigrants who were authorized to live and work in the United States. [509]

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<sup>64</sup> Jesse Coburn, *How the Trump Administration Is Weakening the Enforcement of Fair Housing Laws*, ProPublica (May 15, 2025), <https://www.propublica.org/article/trump-hud-weakening-enforcement-fair-housing-laws>.

<sup>65</sup> Lori Summerfield and Chris Willis, *HUD’s New Direction in Fair Housing Act Enforcement and Rescission of Certain FHEO Guidance*, Troutman Pepper Locke Consumer Financial Services Law Monitor (Sept. 29, 2025), <https://www.consumerfinancialserviceslawmonitor.com/2025/09/huds-new-direction-in-fair-housing-act-enforcement-and-rescission-of-certain-office-of-fair-housing-and-equal-opportunity-guidance/>. Withdrawn guidance includes: *Implementation of Executive Order 13988 on the Enforcement of the Fair Housing Act* (Feb. 11, 2021) (implementing EO 13988: Preventing and Combating Discrimination on the Basis of Sexual Orientation and Gender Identity).

<sup>66</sup> HUD, *HUD Secretary Scott Turner, DHS Secretary Kristi Noem Establish Partnership to End Illegal Alien Exploitation of Housing Programs* (March 24, 2025), [https://www.hud.gov/press/press\\_releases\\_media\\_advisories/hud\\_no\\_25\\_046](https://www.hud.gov/press/press_releases_media_advisories/hud_no_25_046).

<sup>67</sup> HUD, *HUD Cracks Down on Government-Backed Mortgages for Illegal Immigrants* (March 26, 2025), <https://www.hud.gov/news/hud-no-25-048>.

<sup>68</sup> FHA, *Eligibility Requirements for Certain Non-Permanent Resident Borrowers*, Mortgagee Letter 2021-12 (May 28, 2021), <https://www.hud.gov/sites/dfiles/OCHCO/documents/2021-12hsgml.pdf>

<sup>69</sup> USDA, *Retraction of Non-U.S. Citizen Eligibility* (March 18, 2025), <https://content.govdelivery.com/accounts/USDARD/bulletins/3d79381>.

- Language Access. After the administration issued an executive order designating English as the official language of the United States,<sup>70</sup> HUD announced it would only use English for official communications and withdrew translated materials, including disaster recovery materials, fair housing videos, and HUD leases.<sup>71</sup> (8/19/2025)
- HUD Mixed-Status Rule. Under long-standing HUD regulations, “mixed-status” families (where one or more members of the family are undocumented) are permitted to live in public housing or receive vouchers, but their benefits are prorated so that the ineligible members receive no assistance and the other family members pay a greater share of the rent. HUD has drafted a rule that would make everyone in a mixed-status family ineligible for assistance, unless the undocumented family member moves out.<sup>72</sup> The draft rule would also require U.S. citizens applying for or currently receiving housing assistance to provide documents proving their citizenship, such as birth or naturalization certificates. [509] (9/2025) In February 2026, HUD released its proposed rule mix-status rule. (2/19/2026) The rule would affect thousands of families, the majority of whom are families with children.
- HUD Guidance. HUD has withdrawn guidance protecting people who may be denied housing on the basis of immigration status or English-language proficiency.<sup>73</sup> (9/16/2025) [558-559]

### 3-Ignoring the threat to local communities from climate change

- Green and Resilient Retrofit Program. HUD terminated the \$1 billion Green and Resilient Retrofit Program, which would have made HUD-assisted multifamily properties safer from natural disasters.<sup>74</sup> (3/12/2025) Congress had approved the Green and Resilient Retrofit Program in 2022 as part of the Inflation Reduction Act, which included major investments in climate resilience.

<sup>70</sup> White House, *Designating English as the Official Language of the United States* (March 1, 2025), <https://www.whitehouse.gov/presidential-actions/2025/03/designating-english-as-the-official-language-of-the-united-states/>.

<sup>71</sup> Leading Age, *HUD Removes Translated Documents in New English-Only Policy* (Aug. 20, 2025), <https://leadingage.org/hud-removes-translated-documents-in-new-english-only-policy/>.

<sup>72</sup> Jesse Coburn, *Millions Could Lose Housing Aid under Trump Plan*, ProPublica (Sept. 29, 2025), <https://www.propublica.org/article/trump-housing-reforms-aid-hud-immigration-homelessness>; National Housing Law Project, *Trump’s Cruel Directive to Take Away Federal Funding from Housing Authorities Who Protect Immigrants* (Aug. 28, 2025), <https://www.nhlp.org/press-release/national-housing-law-project-on-trumps-cruel-directive-to-take-away-federal-funding-from-housing-authorities-who-protect-immigrants-we-must-keep-families-whole-and-housed/>.

<sup>73</sup> Lori Summerfield and Chris Willis, *HUD’s New Direction in Fair Housing Act Enforcement and Rescission of Certain FHEO Guidance*, Troutman Pepper Locke Consumer Financial Services Law Monitor (Sept. 29, 2025), <https://www.consumerfinancialserviceslawmonitor.com/2025/09/huds-new-direction-in-fair-housing-act-enforcement-and-rescission-of-certain-office-of-fair-housing-and-equal-opportunity-guidance/>. Withdrawn guidance includes: *Immigration Status and Discrimination FAQ* (March 1, 2022); *OGC Guidance Fair Housing Act Protections for LEP Persons* (Sept. 15, 2016); *R8 Legal Opinion – SSN Non-Citizen Legal Memo* (Aug. 15, 2013).

<sup>74</sup> Ashleigh Fields, *Trump Administration Halting \$1B Affordable Housing Preservation Program*, The Hill (March 12, 2025), <https://thehill.com/homenews/administration/5190958-hud-billion-green-resilient/>. National Housing Law Project, *Tenant Advocates Urge Court of Appeals to Protect Tenants, Save Their Homes, and Uphold Preliminary Injunction* (Sept. 30, 2025), <https://www.nhlp.org/press-release/tenant-advocates-urge-court-of-appeals-to-protect-tenants-save-their-homes-and-uphold-preliminary-injunction/>.

- Community Development Block Grant – Disaster Recovery (CDBG-DR). HUD removed requirements that grantees perform fair housing assessments and certify compliance with the Fair Housing Act and other federal civil rights law when administering \$12 billion in long-term disaster recovery funding.<sup>75</sup> (3/19/2025). CDBG-DR is the only federal long-term disaster recovery program and provides critical funds for housing repair and reconstruction in disaster-impacted communities across the country. These harmful changes undermine policies that were developed with direct input from disaster survivors across the nation and will make it harder for federal recovery resources to reach those most in need.
- Climate-Related Risk Management. In its capacity as conservator, FHFA issued an order rescinding FHFA's previously-issued guidance that required Fannie Mae and Freddie Mac to integrate a climate-related risk management framework into its existing enterprise risk management framework.<sup>76</sup> (3/25/2025) Similarly, the federal financial institution regulators (Board of Governors of the Federal Reserve, Federal Deposit Insurance Corporation, Office of the Comptroller of the Currency) announced the withdrawal of interagency Principles for Climate-Related Financial Risk Management for Large Financial Institutions.<sup>77</sup> (10/17/2025) [740]
- Weather Predictions. The administration cut the staff and funding for the National Weather Service and stopped tracking the cost of extreme weather.<sup>78</sup> (7/2025) The cuts to programs, staff, funding, and data have made communities more vulnerable to weather events. [664]

#### 4-Eviscerating key agencies that provide people with access to fair & affordable housing

- HUD Fair Housing Offices. HUD has eviscerated the Office of Fair Housing and Equal Opportunity (FHEO) as well as field staff, making it nearly impossible to enforce the Fair Housing Act and provide fair housing opportunity for all.<sup>79</sup> Administration actions include

<sup>75</sup> HUD, *Waivers and Alternative Requirements for Community Development Block Grant Disaster Recovery Grantees* (March 19, 2025), <https://www.hud.gov/sites/default/files/CPD/documents/CPDUniversalNotice.pdf>; National Low Income Housing Coalition, *Statement on CDBG-DR Universal Notice Modifications* (March 21, 2025), <https://nlihc.org/resource/nlihc-statement-cdbg-dr-universal-notice-modifications>.

<sup>76</sup> FHFA, *Order Rescinding Advisory Bulletin 2024-01: Climate-Related Risk Management*, 2025-OR-FNMA-4, 2025-OR-FHLMC-4 (March 25, 2025), [https://x.com/pulte/status/1904618898537750553?ref\\_src=twsrc%5Egoogle%7Ctwcamp%5Eserp%7Ctwgr%5Etweet](https://x.com/pulte/status/1904618898537750553?ref_src=twsrc%5Egoogle%7Ctwcamp%5Eserp%7Ctwgr%5Etweet).

<sup>77</sup> Federal Reserve, *Agencies Announce Withdrawal of Principles for Climate-Related Financial Risk Management* (Oct. 16, 2025), <https://www.federalreserve.gov/newsevents/pressreleases/bcreg20251016a.htm>.

<sup>78</sup> Margaret Cooney and Cody Hankerson, Center for American Progress, *The Lasting Threat of Trump's Cuts to NOAA and NWS on American Communities* (July 10, 2025), <https://www.americanprogress.org/article/the-lasting-threat-of-trumps-cuts-to-noaa-and-nws-on-american-communities/>.

<sup>79</sup> Raymond Fernandez, *Mass Layoffs at HUD's Fair Housing Office Could Cause Enforcement to Grind to a Halt*, NOTUS (Oct. 23, 2025), <https://www.notus.org/housing/layoffs-housing-urban-development-fair-housing-office>; NFHA, *NFHA Denounces Trump Administration's Firing of Hundreds of HUD Employees during Government Shutdown* (Oct. 14, 2025), <https://nationalfairhousing.org/nfha-denounces-trump-administrations-firing-of-hundreds-of-hud-employees-during-government-shutdown/>; NFHA, *Civil Rights Coalition Denounces HUD's Abdication of Its Fair Housing Obligations* (Sept. 23, 2025), <https://nationalfairhousing.org/civil-rights-coalition-denounces-huds-abdication-of-its-fair-housing-obligations/>; Debra Kamin, *Trump Appointees Roll Back*

removing about 65 percent of FHEO staff, closing field offices, firing whistleblowers, firing staff for insubordination for raising questions, imposing gag orders to prevent investigation communications, stripping career officials of authority to approve settlements or issue charges, removing longstanding precedent and guidance, freezing cases, and revoking settlements. [508, 512]

- DOJ Civil Rights Division. DOJ has suspended many of the activities of the Civil Rights Division and reassigned leadership to prosecute officials from sanctuary cities that protect immigrants.<sup>80</sup> (1/31/2025) The guidance for the DOJ Civil Rights Division's Housing and Civil Enforcement section does not mention the Fair Housing Act.<sup>81</sup> (4/2025) As of October 2025, 75 percent of the attorneys in the Civil Rights Division have left or been forced out.<sup>82</sup> (10/2025) [561-562, 569]
- CFPB. The CFPB has suspended the agency's activities and staff, including its ability to fully enforce the Equal Credit Opportunity Act and other consumer protection laws.<sup>83</sup> (2/10/2025) The administration plans to lay off about 90 percent of the CFPB workforce and has stated that the agency is likely to run out of money by the end of 2025.<sup>84</sup> (11/2025) [839]
- Federal Housing Finance Agency. FHFA forced out staff in the following offices: Division of Public Interest Examinations (fair lending, UDAP, and consumer protection), Office of Minority and Women Inclusion, and Division of Research and Statistics, which means there is no one to monitor Fannie Mae's and Freddie Mac's compliance with fair lending laws to serve the whole of the housing market.<sup>85</sup> (3/18/2025) FHFA no longer has an internal watchdog as the website for the head of the Office of Inspector General (OIG) is labeled as "vacant."<sup>86</sup> (11/3/2025)
- Fannie Mae and Freddie Mac. FHFA fired a total of 14 members of the 25 board members at Fannie Mae and Freddie Mac; installed the FHFA Director as chair of both boards (in violation of

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*Enforcement of Fair Housing Laws*, NY Times (Sept. 22, 2025),  
<https://www.nytimes.com/2025/09/22/realestate/trump-fair-housing-laws.html>.

<sup>80</sup> Chloe Atkins and Daniel Barnes, *Trump Is Reversing the Justice Department's Civil Rights Policies*, NBC News (Jan. 31, 2025), <https://www.nbcnews.com/politics/justice-department/trump-reversing-justice-departments-civil-rights-policies-rcna189657>.

<sup>81</sup> Sam Levine, *Trump Ally Pushes DOJ Unit to Shift Civil Rights Focus*, *New Messages Show*, The Guardian (Apr. 18, 2025), <https://www.theguardian.com/us-news/2025/apr/18/justice-department-civil-rights-division-trump>.

<sup>82</sup> Ryan Lucas, *Trump's Push to Reshape the DOJ's Civil Rights Division Sparks Mass Exodus of Attorneys*, NPR (2025), <https://www.npr.org/2025/05/12/nx-s1-5387495/trumps-push-to-reshape-the-dojs-civil-rights-division-sparks-mass-exodus-of-attorneys>; The Justice Connection, *Urgent Message from Recent DOJ Alumni Decrying Attacks on Justice Department* (Oct. 6, 2025), <https://www.thejusticeconnection.org/wp-content/uploads/2025/10/An-Urgent-Message-from-Recent-DOJ-Alum.pdf>.

<sup>83</sup> Chris Megerian, *Secrecy Preceded the Shutdown of The Consumer Protection Agency's Washington Headquarters*, AP (Feb. 10, 2025), <https://apnews.com/article/cfpb-trump-musk-doge-7a62161f4ed6faf43ec62075b5844e57#:~:text=Vought's%20message%20followed%20one%20on,debts%2C%20compensation%20and%20reduced%20loans>.

<sup>84</sup> Michael Stratford, *CFPB's Breaking Point*, Politico (Nov. 4, 2025), <https://www.politico.com/newsletters/morning-money/2025/11/04/cfpbs-breaking-point-00634453>.

<sup>85</sup> Eric Katz, *Housing Agencies Begin Closing Offices, Escorting Employees Out*, Government Executive (March 19, 2025), <https://www.govexec.com/workforce/2025/03/housing-agencies-begin-closing-offices-escorting-employees-out/403903/>.

<sup>86</sup> Cassandra Dumay, *Top Watchdog Out at FHFA*, Politico (Nov. 3, 2025), <https://subscriber.politicopro.com/article/2025/11/top-watchdog-out-at-fhfa-00634168>.

law); installed FHFA's General Counsel, Clinton Jones, as a member on both boards; and fired Fannie Mae's entire audit committee.<sup>87</sup> (3/17/2025) FHFA fired most of the officers and staff in the Office of Minority and Women Inclusion at Fannie Mae and Freddie Mac; Freddie Mac's CEO (Diana Reid), COO, head of HR, and SVP of Mission and Community Engagement; and Fannie Mae's fair lending officers.<sup>88</sup> (3/18/2025) Fannie Mae's CEO (Priscilla Almodovar) stepped down unexpectedly and was replaced by the COO, and Fannie Mae's General Counsel (Danielle McCoy) was replaced by a deputy general counsel (Tom Klein).<sup>89</sup> (10/27/2025)

## 5-Jeopardizing people's data privacy and protections from unfair algorithms

- **Unfair Algorithms.** The administration rescinded the federal government's framework for responsible artificial intelligence (AI), allowing AI and other automated systems to experiment on the people of America in housing and financial services without the guardrails of a safe, secure, and trustworthy auditing framework.<sup>90</sup> (1/20/2025) [59-60]
- **Personal Data.** Without security clearances or training, Elon Musk and DOGE gained access to the personal, confidential data of the people of America through government databases.<sup>91</sup> For example, DOGE gained access to HUD's Enforcement Management System which contains medical records, financial files, Social Security numbers, medical details, and addresses of domestic violence survivors. (2/26/2025)
- **HUD Guidance.** HUD withdrew guidance regarding the application of the Fair Housing Act to housing-related technology, such as tenant screening.<sup>92</sup> (9/2025) [558]

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<sup>87</sup> Rachel Siegel, *Trump Team Shakes Up Mortgage Giants As It Weighs Their Futures*, Washington Post (March 19, 2025), <https://www.washingtonpost.com/business/2025/03/18/fannie-mae-freddie-mac-fhfa-overhaul-mortgage/>. Lew Sichelman, *Pulte Cleans House at GSEs*, National Mortgage Professional (March 18, 2025), <https://nationalmortgageprofessional.com/news/pulte-cleans-house-gses>.

<sup>88</sup> James Kleimann and Chris Clow, *ESG Team at Fannie Mae Has Been Terminated*, HousingWire (April 25, 2025), <https://www.housingwire.com/articles/esg-team-at-fannie-mae-has-been-terminated-sources/>; Katy O'Donnell, *Housing Regulator in Upheaval as Executives, Employees Put on Leave*, Politico (March 20, 2025), <https://www.politico.com/news/2025/03/20/employees-placed-on-leave-at-top-housing-regulator-00240298>.

<sup>89</sup> Keith Griffith, *Fannie Mae CEO Exits Abruptly as Trump Considers Taking the Mortgage Giant Public*, *Realtor.com* (Oct. 27, 2025), <https://www.realtor.com/news/real-estate-news/fannie-mae-ceo-priscilla-almodovar/>; Ryan Kingsley, *New Head of Single Family, General Counsel Named at Fannie Mae* (Oct. 27, 2025), <https://www.scotsmanguide.com/news/new-head-of-single-family-general-counsel-named-at-fannie-mae/>.

<sup>90</sup> Trump Administration, *Initial Rescissions of Harmful Executive Orders and Actions* (Jan. 20, 2025), <https://www.whitehouse.gov/presidential-actions/2025/01/initial-rescissions-of-harmful-executive-orders-and-actions/>; NFHA, *NFHA Outlines Key Considerations for OSTP Director Michael Kratsios* (April 1, 2025), <https://nationalfairhousing.org/national-fair-housing-alliance-outlines-key-considerations-for-ostp-director-michael-kratsios/>; NFHA, *NFHA President and CEO Lisa Rice Issues Statement on Trump Administration's AI Plan and Executive Orders* (July 5, 2025), <https://nationalfairhousing.org/national-fair-housing-alliance-nfha-president-and-ceo-lisa-rice-issues-statement-on-the-trump-administrations-ai-plan-and-executive-orders/>.

<sup>91</sup> Jesse Coburn, *DOGE Gains Access to Confidential Records on Housing Discrimination, Medical Details - Even Domestic Violence*, ProPublica (Feb. 26, 2025), <https://www.propublica.org/article/doge-elon-musk-hud-housing-discrimination-privacy-domestic-violence>.

<sup>92</sup> Lori Summerfield and Chris Willis, *HUD's New Direction in Fair Housing Act Enforcement and Rescission of Certain FHEO Guidance*, Troutman Pepper Locke Consumer Financial Services Law Monitor (Sept. 29, 2025), <https://www.consumerfinancialserviceslawmonitor.com/2025/09/huds-new-direction-in-fair-housing-act-enforcement-and-rescission-of-certain-office-of-fair-housing-and-equal-opportunity-guidance/>. Withdrawn guidance includes: DOJ Press Release on *AI Discrimination in Tenant Screening* (Jan. 9, 2023); *Louis et al. v.*

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*SafeRent et al. U.S. Statement of Interest (tenant screening algorithm) (Jan. 9, 2023); Guidance on Application of the Fair Housing Act to the Advertising of Housing, Credit, and Other Real Estate-Related Transactions through Digital Platforms (Apr. 29, 2024).*