



Metropolitan Washington
Council of Governments

January 14, 2026

The Honorable Scott Turner
Secretary
U.S. Department of Housing and Urban Development
451 7th Street SW
Washington, DC 20410

Dear Secretary Turner:

On behalf of the Metropolitan Washington Council of Governments (COG) and its Homeless Services Committee, we urge the U.S. Department of Housing and Urban Development (HUD) to take immediate, time-limited action to ensure continuity of Continuum of Care funding during the Fiscal Year 2025 transition and prevent avoidable disruptions to housing and services.

For more than two decades, COG and its member jurisdictions have addressed homelessness as a regional challenge through sustained coordination and system-level planning across the District of Columbia, suburban Maryland, and Northern Virginia.

This regional approach depends heavily on the Continuum of Care (CoC) program funding. COG's regional Homeless Services Committee is comprised of nine CoCs that function as core infrastructure for implementing coordinated entry, managing homelessness data systems, supporting performance management, and delivering federally funded housing and services in partnership with local governments and providers.

The scale of need in metropolitan Washington underscores the importance of maintaining that continuity. The [2025 regional Point-in-Time Count](#) identified 9,659 people experiencing homelessness across the region.

HUD's withdrawal of the Fiscal Year 2025 Continuum of Care Notice of Funding Opportunity in December 2025, followed by ongoing revisions and related litigation, has introduced uncertainty into a system that depends on predictability. While a federal court has temporarily paused the implementation of the disputed changes, uncertainty remains regarding the timing of FY2025 awards, grant execution, and the availability of funds, all of which are critical for communities and the residents they serve.

National analysis underscores the scale of this risk. The National Alliance to End Homelessness has estimated that [approximately one third of Continuum of Care funding nationally is associated with grants expiring between January and June 2026](#), meaning that a substantial share of existing housing and services could face disruption if continuity measures are not put in place during the

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FY2025 transition. The metropolitan Washington CoCs collectively reflect the similar renewal-based funding structure as the national program. Loss of federal funding for contracts ending during the winter months also places human lives at risk.

In a region where CoC funding is overwhelmingly used to renew existing housing and services, this is not a marginal administrative concern. Disruptions at this scale would directly affect people who are already housed or actively being served, undermine system performance, and increase costs for local governments and providers that must respond to the consequences of funding instability. In light of these considerations, COG urges HUD to take the following actions:

- 1) Implement a time-limited continuity measure that noncompetitively renews or extends all existing Continuum of Care grants expiring during calendar year 2026 for one additional 12-month period at base renewal levels, in order to prevent avoidable disruptions to housing and services while the Fiscal Year 2025 CoC funding process is completed.
- 2) Issue timely written guidance describing the interim steps the Department will take to maintain continuity of existing CoC-funded housing and services during this transition, including clarity on anticipated timelines and measures to prevent funding gaps for grants expiring in early and mid-2026.

COG and its member jurisdictions stand ready to support HUD by sharing regional information on system capacity, timing risks, and potential impacts on housing stability, compiled through existing coordination among the region's CoCs. Thank you for your attention to maintaining continuity of care and protecting housing stability for people experiencing homelessness in metropolitan Washington. We welcome continued dialogue and look forward to working with HUD to ensure the effectiveness and stability of the CoC program during the FY2025 transition.

Sincerely,



Reuben B. Collins, II
COG Board Chair
Charles County Commissioner President



Charles Allen
COG Board Vice Chair
District of Columbia Councilmember



Alyia Gaskins
COG Board Vice Chair
City of Alexandria Mayor