



April 3, 2025

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

Dear Secretary Turner,

The National Council of State Community Development Agencies (COSCDA) and the National Community Development Association (NCDAA) write to request additional guidance regarding **Consolidated Plan (ConPlan)** and **Annual Action Plan (AAP)** submissions for Fiscal Year 2025. COSCDA and NCDAA represent states and local jurisdictions that administer HUD grant programs, including the Community Development Block Grant (CDBG), HOME Investment Partnerships program (HOME), Emergency Solutions Grants (ESG), and CDBG Disaster Recovery (CDBG-DR).

On January 15, HUD's Office of Community Planning and Development issued [Notice CPD-25-02](#). The notice included guidance on ConPlan and AAP submissions for CDBG, HOME, HTF, ESG, and HOPWA (formula) grantees. However, the Notice CPD-25-02 predates the inauguration of President Trump and his subsequent executive orders. COSCDA and NCDAA members are concerned that their submissions may be flagged for noncompliance with the executive orders but are unsure of which changes to make to their plans in the absence of updated guidance.

We request additional guidance—similar to the guidance provided to CDBG-DR grantees in [Memorandum 2025-02](#)—on how to align ConPlans and AAPs with these and any other applicable executive orders:

- Memorandum for the Heads of Executive Department and Agencies ([90 FR 8245](#)) | “Delivering Emergency Price Relief for American Families and Defeating the Cost-of-Living Crisis”
- Executive Order 14151 ([90 FR 8339](#)) | “Ending Radical and Wasteful Government DEI Programs and Preferencing”
- Executive Order 14173 ([90 FR 8633](#)) | “Ending Illegal Discrimination and Resorting Merit-Based Opportunity”
- Executive Order 14224 ([90 FR 11363](#)) | “Designating English as the Official Language of the United States”

HUD grantees at the state and local levels are willing and able to comply with additional guidance as it becomes available. **If HUD is unable to provide timely guidance in advance of the first FY25 ConPlan and AAP submissions on July 14 (60 days after the May 14 allocation deadline), then we request a 60-day extension to allow grantees time to comply with any requested changes.** Grant planning is a carefully coordinated process that involves many



community partners and stakeholders. Reacting to changes to the traditional planning process will require a reasonable adjustment period.

Thank you for your consideration. For further discussion of these requests, please reach out to Tess Hembree (thembree@coscda.org), Executive Director, COSCDA and Vicki Waston (vwatson@ncdaonline.org), Executive Director, NCDAA.

Sincerely,

A handwritten signature in black ink, appearing to read 'Tess Hembree', written in a cursive style.

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

A handwritten signature in black ink, appearing to read 'Vicki Waston', written in a cursive style.

Vicki Waston
Executive Director
National Community Development Association (NCDAA)