

CHC Federal Update – October 2026

With the election just about a month away, Congress out of DC and the political world focused on the campaign trail, I would like to suggest we all instead focus on something much more important: the baseball play-offs.

Seriously though, we do have some unfinished business and foremost is the pending deadline to submit comments on the proposed rule changes to the Community Reinvestment Act.

The DC affordable housing establishment has been preparing you for this and now is the time to get those comment letters drafted. The ACTION Campaigns CRA working group has developed talking points you may use to draft an original letter, as well as a sample comment letter you may utilize, plugging in your relevant information related to your experience with investments and financing by financial institutions satisfying their CRA obligations. We ask that your comment letter be submitted using your letterhead.

The [letter](#) and [talking points](#) focus on the key points we believe are relevant to the changes the regulators are proposing for financial institutions and how those changes would affect affordable housing investment, financing and production. Comments to the regulators are due October 13th and may be submitted using this [link](#).

In addition to your comment letter, we again ask you to consider [signing onto a letter](#) to the regulators from the *National Association of Affordable Housing Lenders*. Ray may have already distributed this letter but just in case, we ask that if you have not signed onto the NAAHL letter, you do so now. The deadline for signing onto this letter is October 6th.

BABA is the other issue we continue to work on with our friends at HUD and the Made in America Office at OMB. We are told the process is on track to see the first product-wide waiver, HVAC's, around the Thanksgiving holiday. We are working on other impossible to source products for future waivers as well as possible changes to the mandate for some appliances and elevators. Changes to the de minimis waiver percentage will depend on us making a compelling case that the current 5% is not enough. We need examples of projects that have been stymied or significantly increased costs due to the 5% limit. We will keep you update on this process and our work with the administration.

Finally, after the election be prepared for serious work on the FY 2027 budget. The current continuing resolution expires on December 11 and appropriators of both parties are determined to pass a budget by year end. The issue is the administrations continued use of pocket recissions and impoundment. Congress states this practice is illegal and is determined to pass specific budgets with guidance to prevent OMB from arbitrarily sidelining funding or using it for purposes other than what Congress has appropriated. It will be a statement if Congress actually passes a budget before yearend.

Thank you for your continued advocacy and for the CRA comment letters. And remember, please vote.

David Gasson