

December 15, 2025



**The HOME Coalition supports the Build America, Buy America (BABA) Provision in Sec. 201 of the *Housing for the 21<sup>st</sup> Century Act*.**

Dear Members of the House Financial Services Committee,

On behalf of the undersigned members of the HOME Coalition, a broad national coalition of affordable housing organizations, we write to express our strong support for maintaining Section 201, “HOME Reform,” in the *Housing for the 21st Century Act* exactly as written. This includes our unequivocal support for Section 291, “Application of Build America, Buy America Requirements,” which would exempt the HOME Investment Partnerships Program (HOME) from the Build America, Buy America Act (BABA). Although our organizations support American manufacturing and the intent behind BABA, the current requirements do not fully reflect the realities or challenges facing the affordable housing industry and its implementation has been **unworkable** for affordable housing programs.

Communities across the country—rural, suburban, and urban—consistently identify HOME as indispensable to expanding affordable housing options and improving quality of life. At a time when the nation faces an unprecedented housing affordability and supply crisis, the program must be allowed to operate efficiently and predictably.

As drafted, Section 201 contains essential reforms that will modernize and strengthen HOME, ensuring that this critical program can respond effectively to today’s urgent housing supply challenges. Removing or altering the HOME exemption from BABA would significantly impede the program’s ability to produce and preserve affordable housing.

Current BABA requirements do not reflect the realities faced by the affordable housing sector. Demand for construction materials already far exceeds supply, leading to lengthy delays; members of our organizations routinely report that sourcing necessary materials can take months. BABA compounds these challenges by:

- Further extending project timelines, as American-made products are often harder to source or are produced in insufficient quantity.
- Adding significant costs, as domestic alternatives can be substantially more expensive than imported products.
- Creating complex compliance barriers, since determining whether a product qualifies as “Made in America” frequently requires extensive research and documentation.
- Slowing procurement, as uncertainty about a product’s origin forces developers and contractors into time-consuming verification processes.

HUD has issued phased implementation waivers and public-interest exemptions intended to ease the early impacts of BABA on small projects and urgent needs. However, the waiver process:

- Remains underdeveloped and has taken months for initial waivers to clear;
- Often requires individual product-level waivers, demanding additional market research and documentation;
- Is subject to long and unpredictable HUD review timelines, with no certainty of approval;
- Will be further slowed by significant staffing reductions at HUD.

These constraints will delay closings for HOME-funded developments and shrink the pool of small contractors and subcontractors able or willing to participate in HOME construction. This will significantly impact HOME’s ability to help address the nation’s affordable housing supply.

BABA requirements, as applied to HOME, would impose unworkable processes, unrealistic timelines, and substantial cost burdens that directly undermine HOME's mission. Section 201's reforms, including the BABA exemption, are necessary to preserve HOME's effectiveness and ensure that limited federal dollars can stretch further.

**For these reasons, we strongly urge Congress to maintain Section 201 in the *Housing for the 21st Century Act* without modification, including the exemption of the HOME program from BABA requirements.** Preserving this language will enable affordable housing providers to build and preserve more homes, more cost-effectively, at a time when the nation desperately needs additional supply.

We appreciate your leadership and look forward to working with you to advance solutions that expand access to safe, decent, and affordable housing. If you have any questions about this letter, please contact Jenna Hampton ([jhampton@cosceda.org](mailto:jhampton@cosceda.org)) with the Council of State Community Development Agencies, Xavier Arriaga ([xarriaga@enterprisecommunity.org](mailto:xarriaga@enterprisecommunity.org)) with Enterprise Community Partners, or Glenn Gallo ([ggallo@ncsha.org](mailto:ggallo@ncsha.org)) at the National Council of State Housing Agencies.

Sincerely,

Affordable Housing Tax Credit Coalition  
Council for Affordable & Rural Housing  
Council of State Community Development Agencies  
Corporation for Supportive Housing  
Enterprise Community Partners  
Federation of Appalachian Housing Enterprises  
Habitat for Humanity International  
Housing Partnership Network  
Local Initiatives Support Corporation  
National Association for County Community and Economic Development  
National Association of Community Development Agencies  
National Association of Home Builders  
National Association of Housing and Redevelopment Officials  
National Council of State Housing Agencies  
National Housing Conference  
National Low Income Housing Coalition  
National NeighborWorks Association  
National Multifamily Housing Council  
National Association of Local Housing Finance Agencies  
Stewards of Affordable Housing for the Future