

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

STATE OF WASHINGTON, *et al.*,

Plaintiffs,

v.

DEPARTMENT OF HOUSING AND URBAN
DEVELOPMENT, *et al.*,

Defendants.

AND

NATIONAL ALLIANCE TO END
HOMELESSNESS, *et al.*,

Plaintiffs,

v.

DEPARTMENT OF HOUSING AND URBAN
DEVELOPMENT, *et al.*,

Defendants.

Case Nos. 25-cv-626-MSM-AEM
25-cv-636-MSM-AEM

District Judge Mary S. McElroy
Magistrate Judge Amy E. Moses

DEFENDANTS' STATUS REPORT

Defendants file this sixteenth status report pursuant to the Court's Order at its April 27, 2026 status conference. On May 4, 2026, Defendants provided the "granular" detail that the Court requested about the status of fiscal year 2025 Continuum of Care (CoC) renewals. *State of Washington v. HUD*, No. 25-cv-626 (D.R.I.) ("*State Litigation*"), ECF No. 101; *Nat'l All. to End Homelessness*, No. 25-cv-636 (D.R.I.) ("*NAEH Litigation*"), ECF No. 88. On May 11, 2026, Defendants updated this Court that the fiscal year 2025 CoC renewal grant agreements were underway. *State Litigation*, ECF No. 103; *NAEH Litigation*, ECF No. 90. On May 18, 2026, Defendants notified this Court that the majority of the first quarter's grant agreements had been

issued. *State Litigation*, ECF No. 105; *NAEH Litigation*, ECF No. 92. On May 26, 2026, Defendants informed the Court that more first quarter grant agreements had been issued and second quarter grant agreements had begun to be issued. *State Litigation*, ECF No. 106; *NAEH Litigation*, ECF No. 93.

On June 1, 2026, Defendants updated the Court that it was continuing to issue first and second quarter grant agreements, and it had begun issuing award letters for third and fourth quarter renewals. *State Litigation*, ECF No. 107; *NAEH Litigation*, ECF No. 94. On June 8, 2026, Defendants notified this Court that HUD continued to issue more first and second quarter grant agreements and finished issuing third and fourth quarter award letters. *State Litigation*, ECF No. 108; *NAEH Litigation*, ECF No. 95. On June 15, 2026, Defendants provided further updates on their progress in issuing awards. *State Litigation*, ECF No. 109; *NAEH Litigation*, ECF No. 96. On June 22, 2026, Defendants provided another update. *State Litigation*, ECF No. 110; *NAEH Litigation*, ECF No. 98. On June 29, 2026, the Court granted in part and denied in part Plaintiffs' motions for summary judgment, holding that rescission of earlier NOFOs and implementation of a new 2025 NOFO was arbitrary and capricious for failing to adequately consider the impacts its change in policy might have and failing to provide a rational basis for the new grant instruments. *See State Litigation*, ECF No. 113 at 9; *NAEH Litigation*, ECF No. 99 at 9. The Court retained its requirement that Defendants file weekly status reports. *See id.* at 12. On the same day, Defendants updated the Court again on their progress in issuing awards. *See State Litigation*, ECF No. 114; *NAEH Litigation*, ECF No. 100. Defendants provided further updates on July 6 and 13. *State Litigation*, ECF Nos. 115, 117; *NAEH Litigation*, ECF Nos. 101, 102. On July 20, Defendants notified the Court that third and fourth quarter grant agreements would begin issuing that week. *State Litigation*, ECF No. 118; *NAEH Litigation*, ECF No. 103. And on July 27, Defendants

reported that HUD had begun issuing those agreements and was continuing to issue and execute first and second quarter agreements. *State Litigation*, ECF No. 119; *NAEH Litigation*, ECF No. 104. Additional updates followed on August 3 and August 10. *State Litigation*, ECF Nos. 120, 121; *NAEH Litigation*, ECF Nos. 105, 106. In this status report, Defendants provide another update on the status of renewal grants for projects with awards expiring in quarters one (“Q1”), two (“Q2”), three (“Q3”), and four (“Q4”) of this year.

Quarter 1 renewals. As of the date of this filing, HUD has issued 604 out of 608 grant agreements for awardee signature. Of that amount, 573 have been signed and returned to HUD, including 554 that are fully executed. Sixteen awards had conditions, all of which have been resolved. All grant agreements have been modified to remove Addendum 1.

Quarter 2 renewals. As of the date of this filing, HUD has issued 1,502 out of 1,795 grant agreements for awardee signature. Of that amount, 1,419 have been signed and returned to HUD for execution, including 1,386 that have been fully executed. There are 57 Q2 renewals that require additional preparation before they can be issued, including 11 agreements with conditions that grantees have yet to be resolved.

Quarter 3 renewals. As of the date of this filing, HUD has issued 1,861 out of 2,522 grant agreements for awardee signature. Of that amount, 1,090 have been signed and returned to HUD, including 894 that have been fully executed. There are 43 Q3 renewals that require additional preparation before they can be issued, including 31 agreements with conditions that grantees have yet to resolve.

Quarter 4 renewals. As of the date of this filing, HUD has issued 1,381 out of 1,775 grant agreements for awardee signature. Of that amount, 675 have been signed and returned to HUD, including 518 that have been fully executed. There are 53 Q4 renewals that require additional

preparation before they can be issued, including 29 agreements with conditions that grantees have yet to resolve.

Date: August 17, 2026

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that on August 17, 2026, the above document was filed with the CM/ECF filing system.

/s/ William S. Jankowski