

Brownstein

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TO: Interested Parties

FROM: Brownstein Hyatt Farber Schreck

RE: ROAD to Housing – Housing for the 21st Century Comparison

This table provides a comparison of provisions in the Housing for the 21st Century Act ([H.R. 6644](#)) and the ROAD to Housing Act ([S. 2651](#)). Section 1 provides a summary of provisions that are in both the ROAD to Housing Act and the Housing for the 21st Century Act. Section 2 provides a summary of provisions just in the Housing for the 21st Act. Section 3 provides a summary of provisions just in the ROAD to Housing Act. The ROAD to Housing Act was considered by the Senate Banking Committee in a July 29, 2025 [markup](#). The Housing for the 21st Century Act was considered by the House Financial Services Committee in a Dec. 16-17, 2025 [markup](#).

Provision Summary	Section Number and Title in ROAD to Housing Act	Section Number and Title in Housing for the 21st Century Act
Provisions in Both ROAD to Housing and Housing for the 21st Century		
This section permits the Department of Housing and Urban Development (HUD) to review the performance of housing counseling agencies and counselors. HUD will be able to take actions like requiring additional training or revoking the counselor’s certification if a counselor’s performance falls short.	Section 101 – <i>Reforms to Housing Counseling and Financial Literacy Programs.</i>	Section 405 – <i>Reforms to Housing Counseling and Financial Literacy Programs.</i>
This provision directs HUD to develop best practice frameworks for zoning and land use policies within three years of enactment.	Section 203 – S. 1299 , <i>Housing Supply Frameworks Act.</i>	Section 101 – H.R. 2840 , <i>Housing Supply Frameworks.</i>
This provision increases the Public Welfare Investment Cap for the Office of the Comptroller of the Currency (OCC) and the Federal Reserve from 15% to 20%.	Section 205 – S. 2464 , <i>Community Investment and Prosperity Act.</i>	Section 303 – H.R. 5913 , <i>Community Investment and Prosperity.</i>
This provision would alter the National Environmental Protection Act review for small and infill housing projects.	Section 208 – S. 2390 , <i>Unlocking Housing Supply Through Streamlined and Modernized Reviews Act.</i>	Section 104 – H.R. 4660 , <i>Unlocking Housing Supply Through Streamlined and Modernized Reviews.</i>
This provision would establish a HUD-administered grant program for communities to establish pre-approved housing designs.	Section 210 – S. 2361 ,	Section 102 – H.R. 5907 , <i>Accelerating Home Building.</i>

	<i>Accelerating Home Building Act.</i>	
This provision would allow HUD to adjust Federal Housing Administration (FHA) loan limits through a formal rulemaking. The provision allows HUD to revise the statutory exceptions for high-cost percentage and high-cost areas annual indexing.	Section 213 – S. 1527 , <i>Housing Affordability Act.</i>	Section 106 – H.R. 6132 , <i>Multifamily Loan Limits.</i>
This provision would change the federal definition of manufactured housing to include modular and prefabricated units.	Section 301 – S. 2414 , <i>Housing Supply Expansion Act.</i>	Section 301 – <i>Manufactured Housing Innovations (a-f)</i> H.R. 6293 , <i>Housing Supply Expansion.</i>
This provision would establish a pilot program under HUD’s Family Self-Sufficiency initiative to fund escrow accounts for low-income Americans.	Section 404 – S. 970 , <i>Helping More Families Save Act.</i>	Section 404 – H.R. 4385 , <i>Family Self Sufficiency Escrow Expansion Pilot Program.</i>
This provision would allow required inspections for voucher programs to be waived if the unit was inspected in the year prior to the issuance of the loan and the unit is financed through other federal housing programs. This bill would also permit new landlords to request pre-inspections to increase access to housing for voucher holders.	Section 405 – S. 890 , <i>Choice in Affordable Housing Act.</i>	Section 205 – H.R. 1981 , <i>Choice in Affordable Housing.</i>
This provision would require FHA mortgage disclosures to include cost comparison information for veterans.	Section 602 – S. _____ , <i>Veterans Affairs Loan Informed Disclosure (VALID) Act.</i>	Section 402 – H.R. 3634 , <i>Military Service Question.</i>
This bill would permanently exclude veterans’ disability compensation from annual income under the HUD-VASH program.	Section 603 – S. 1415 , <i>Housing Unhoused Disabled Veterans Act.</i>	Section 401 – H.R. 965 , <i>Housing Unhoused Disabled Veterans.</i>
This bill would direct HUD, USDA, and the VA to identify areas for collaboration to streamline and improve housing program implementation.	Section 801 – S. 1695 , <i>HUD-USDA-VA Interagency Coordination Act.</i>	Section 403 – H.R. 5429 , <i>HUD-USDA Interagency Coordination.</i>
This provision would direct HUD and USDA to coordinate on joint environmental reviews for housing projects funded by both agencies.	Section 802 – S. 2423 , <i>Streamlining Rural Housing Act.</i>	Section 105 – H.R. 4989 , <i>Federal Housing Agency Application of Environmental Reviews.</i>
Provisions Only in Housing for the 21st Century Act		

<p>This provision would require the HUD secretary to issue guidelines for the permitting process for point-access block residential buildings. It also defines a point-access block building as an R-2 occupancy residential structure that is less than five stories.</p>		<p>Section 103 – H.R., <i>Federal Guidelines for Point-Access Block Buildings.</i></p>
<p>This provision would require the Comptroller General to release a report to Congress within 1 year of enactment that identifies housing affordability issues for middle-income homeowners and renters, federal housing programs that are available to low-income, but not middle-income households, and any gaps in the inclusion of middle-income households in these programs. The report would also set recommendations for a definition of “workforce housing” and analyze how the definition could relate to incentives for workforce housing development.</p>		<p>Section 107 – GAO Studies (a) – H.R., <i>Housing For America’s Middle Class.</i></p>
<p>This provision would require the comptroller general to release a study within one year of enactment that examines the costs and benefits of establishing a uniform federal residential building code, including whether the code would lessen the time for permit approval, the effect of the code on affordability and if the code would increase the quality of affordable housing.</p>		<p>Section 107 – GAO Studies (b) – H.R., <i>Uniform Building Code Study.</i></p>
<p>This provision would expand access to affordable housing with a primary focus on rental housing. First, the bill would amend the low income definition in the Affordable Housing Act to mean any family below the median household income. Next, the bill would allow funds from the Affordable Housing Act to be used for infrastructure projects in areas that do not receive funds from the Housing and Community Development Act. The bill would also allow any funds not used from the National Affordable Housing Act to be repurposed if they are uninvested for two years. The bill would give the HUD secretary the ability to remove duplicitous environmental review requirements and it would make certain housing projects (new construction infill housing projects, property purchased for affordable housing, rehabilitation projects and new construction projects of 15 units or less) exempt from NEPA reviews. Finally, the bill would allow HOME Program projects to be exempt from NEPA and Build America, Buy America reviews and mandates.</p>		<p>Section 201 – H.R. 5878, <i>HOME Reform.</i></p>
<p>This provision would discourage the use of overly burdensome land use policies in communities that receive funds from the CDBG program. This bill would require anyone who receives CDBG funds to submit a plan to HUD on the land use policies in effect for the area receiving the funds.</p>		<p>Section 202 – <i>Community Development Fund Amendments (a-b)</i> H.R. 4659, <i>Identifying Regulatory Barriers</i></p>

		<i>to Housing Supply Act.</i>
This provision would establish a database of undeveloped publicly owned land.		Section 202 – <i>Community Development Fund Amendments (c)</i> H.R. , <i>Databases of Publicly Owned Lands.</i>
This provision would create a new HUD grant program for regional housing agencies to assist in the development of housing plans, improvements to housing strategies, the development of new regulatory requirements and the reforming of zoning codes.		Section 203 – H.R. , <i>Grants for Planning and Implementation Associated with Affordable Housing.</i>
This provision would expand eligibility for the Rural Housing Service’s Section 504 program and raise the cap from \$7,500 to \$15,000.		Section 204 – H.R. , <i>Rural Housing Service Program Improvements.</i>
This provision would require the HUD secretary to establish federal construction and safety standards for manufactured homes.		Section 301 – <i>Manufactured Housing Innovations (g-j)</i> H.R. 5263 , <i>Primary Authority to Establish Manufactured Home Construction and Safety Standards.</i>
This provision would require the HUD secretary to submit a report within one year of enactment on how to incentivize small-dollar mortgages (less than \$100,000). Specifically, the report would provide a proposal for a pilot program on small-dollar mortgages that could authorize direct payments to lenders, adjust terms and costs of FHA loans, provide direct grants to borrowers to cover costs associated with obtaining a mortgage, including title insurance, and provide technical assistance to lenders for these loans.		Section 302 – H.R. , <i>FHA Small Dollar Mortgages.</i>
This provision would instruct the HUD within 1 year of enactment to establish a helpline to provide tenants in federally assisted rental units with assistance for eviction related matters.		Section 406 – <i>Establishment of Eviction Helpline.</i>

This bill would create a HUD pilot program that provides grants to public housing agencies and eligible owners of federally assisted rental properties to place temperature sensors in units to verify that those units meet required temperature standards.		Section 407 – H.R. 638 , <i>Temperature Sensor Pilot Program</i> .
This provision would direct the comptroller general to carry out a study within 1 year of enactment that examines options to remove barriers to housing for disabled or elderly Americans. It specifically highlights barriers in the supportive housing program from section 202 of the Housing Act of 1959 and section 811 of the National Affordable Housing Act.		Section 408 – GAO Studies (a) H.R. , <i>Report to Congress</i> .
This provision would direct the Comptroller General to carry out a study to determine how many public housing residential units are located within 1 mile of any sites included on the National Priorities List.		Section 408 – GAO Studies (b) GAO Study to Determine Proximity of Housing to Superfund Sites.
This provision would direct the comptroller general to carry out a study related to residential heirs property and ways to reduce residential heirs property.		Section 408 – GAO Studies (c) <i>Report to Congress</i> .
This provision would require the HUD secretary to testify before the House Financial Services Committee and Senate Banking Committee annually regarding public housing, the Federal Housing Finance Agency (FHFA) and other ongoing department activities.		Section 501 – H.R. 3774 , <i>Requirement to Testify</i> .
This provision would require each federal monitor and receiver to testify yearly before the House Financial Services Committee and Senate Banking Committee.		Section 502 – <i>Improving Public Housing Agency Accountability</i> .
Provisions Only in the ROAD to Housing Act		
This section lifts the cap on the Rental Assistance Demonstration (RAD) program and codifies existing tenant protections.	Section 201 – <i>Rental Assistance Demonstration Program</i> .	
This section enables the HUD Secretary to provide added weight to applicants located in or serving Opportunity Zones for competitive grants relating to the construction, modification, rehabilitation or preservation of housing.	Section 202 – <i>Increasing Housing in Opportunity Zones</i> .	
This provision establishes a 5-year pilot program at HUD to offer grants and forgivable loans to low- and moderate-income homeowners and small landlords to address home repair needs and health hazards.	Section 204 – S. 3871/118 , <i>Whole-Home Repairs Act</i> .	
This bill would create a pilot program to incentivize housing development in Community Development Block Grant participating jurisdictions, excluding states.	Section 206 – <i>Build Now Act</i> .	

<p>This provision would waive certain environmental review requirements for certain HUD funding programs.</p>	<p>Section 207 – S. ___, <i>Better Use of Intergovernmental and Local Development (BUILD) Act.</i></p>	
<p>This section would create a community fund to pay for community infrastructure, housing and sewer systems.</p>	<p>Section 209 – <i>Innovation Fund.</i></p>	
<p>This provision would make building housing projects near public transit more favorable in the Federal Transit Authority’s evaluation process.</p>	<p>Section 211 – H.R. ___, <i>Building More Housing Near Transit Act.</i></p>	
<p>This provision would create a pilot program to convert vacant and abandoned buildings into attainable housing.</p>	<p>Section 212 – <i>Revitalizing Empty Structures into Desirable Environments (RESIDE) Act.</i></p>	
<p>This provision would modify the financing draw schedule to encourage modular housing construction.</p>	<p>Section 302 – <i>Modular Housing Production Act.</i></p>	
<p>This provision would update mortgage lending standards for manufactured housing through FHA. It would also direct HUD to conduct a study into the cost effectiveness of supporting factory built housing.</p>	<p>Section 303 – S. 964, <i>Property Improvement and Manufactured Housing Loan Modernization Act.</i></p>	
<p>This provision would authorize HUD’s PRICE program to provide grants to communities to maintain, protect and stabilize manufactured housing.</p>	<p>Section 304 – <i>Preservation and Reinvestment Initiative for Community Enhancement (PRICE) Act.</i></p>	
<p>This section would require the Consumer Financial Protection Bureau (CFPB) to issue a report to Congress about the effects of loan originator compensation on the availability of small-dollar mortgage loans. This section would also allow the CFPB to amend rules to encourage small-dollar mortgage loans.</p>	<p>Section 401 – <i>Creating Incentives for Small Dollar Originators.</i></p>	
<p>This section would direct the CFPB and the Federal Housing Finance Administration (FHFA) to assess how current rules limiting mortgage points and fees affect lending practices. It would also authorize the CFPB to revise these regulations as needed to promote greater access to small-dollar mortgage loans.</p>	<p>Section 402 – <i>Small Dollar Mortgage Points and Fees.</i></p>	

<p>This provision would allow both licensed and credentialed appraisers to conduct appraisals for FHA-insured mortgage lending transactions.</p>	<p>Section 403 – S. 3902/118, <i>Appraisal Industry Improvement Act.</i></p>	
<p>This provision would permanently authorize the Community Development Block Grant–Disaster Recovery program and establish the Office of Disaster Management and Resiliency within HUD to oversee the program.</p>	<p>Section 501 – S. 1686/118, <i>Reforming Disaster Recovery Act.</i></p>	
<p>This section would reauthorize the HOME Investment Partnerships Program, and update the program administration. The provision would also raise the administrative expenses cap from 10% to 15%. The provision also mandates on-site inspections and exempts small scale housing providers from tenant selection procedures, among other provisions.</p>	<p>Section 502 – H.R. 7075/118, <i>HOME Investment Partnerships Reauthorization and Improvement Act.</i></p>	
<p>This provision would reform the existing Rural Housing Service, specifically decoupling rental assistance from maturing mortgages.</p>	<p>Section 503 – S. 1260, <i>Rural Housing Service Reform Act.</i></p>	
<p>This section authorizes a Moving to Work expansion cohort for an additional 25 public housing agencies that are designated as high performing agencies.</p>	<p>Section 504 – <i>New Moving to Work Cohort.</i></p>	
<p>This bill would enact several reforms to homelessness programs targeted at reducing homelessness nationwide. The provision would move Continuum of Care (CoC) funding applications from an annual to a biennial schedule and direct HUD to simplify Housing Choice Voucher procedures. It mandates a study of hiring, retention, and pay across homeless service organizations, authorizes dedicated funds to modernize CoC application and grant management software.</p>	<p>Section 505 – S. 2234, <i>Reducing Homelessness through Program Reform Act.</i></p>	
<p>This section permits states and local governments receiving Emergency Solutions Grant (ESG) funds to apply for a waiver of the 60% statutory limit on spending for emergency shelter beds and street outreach.</p>	<p>Section 506 – <i>Incentivizing Local Solutions to Homelessness.</i></p>	
<p>This bill would add a disclosure to Fannie Mae and Freddie Mac’s uniform residential loan application form to ensure veterans are made aware of their home loan benefits through the Veteran Administration (VA).</p>	<p>Section 601 – <i>VA Home Loan Awareness Act.</i></p>	
<p>This section would require annual testimony on housing and community development issues from the heads of HUD, FHA, Ginnie Mae, U.S. Department of Agriculture (USDA), FHFA, and the VA.</p>	<p>Section 701 – <i>Requiring Annual Testimony and Oversight from Housing Regulators.</i></p>	

<p>This section would require HUD to report monthly to Congress on the state of statutorily required capital ratio of the Mutual Mortgage Insurance Fund, including a notice to Congress any time the ratio falls below statutorily required levels.</p>	<p>Section 702 – <i>FHA Reporting Requirements on Safety and Soundness.</i></p>	
<p>This section would require USICH to provide an update on the status of the plan to reduce homelessness in its annual planning process and it would require annual USICH Congressional testimony.</p>	<p>Section 703 – <i>United States Interagency Council on Homelessness (USICH) Oversight.</i></p>	
<p>This bill would establish a NeighborWorks Office of the Inspector General.</p>	<p>Section 704 – <i>NeighborWorks Accountability Act.</i></p>	
<p>This provision would require mortgage lenders to establish procedures that allow consumers to request a second appraisal or a review of their home’s valuation if they suspect the original appraisal is inaccurate.</p>	<p>Section 705 – <i>Appraisal Modernization Act.</i></p>	
<p>This section would direct HUD to conduct a study on the effects of work requirements by public housing agencies, specifically including the effects on homelessness, poverty, asset building, job attainment, and public housing agency administrative capacity.</p>	<p>Section 803 – <i>Improving Self-Sufficiency of Families in HUD-Subsidized Housing.</i></p>	