

ATTACHMENT C

Last updated 7/10/26

County Action	Issue	Summary of Action	County Impact	Status
Public Comment	Public Student Loan Forgiveness	The County filed a public comment opposing the proposed regulatory changes to the definition of “qualified employer” for the purposes of PSLF. The change would exclude employers who engage in conduct with a “substantial illegal purpose” which could be used to target public employers with DEI/sanctuary policies.	Harm to the nearly 400 County employees who applied for PSLF in the past 5 years & impacts on County recruiting and retention efforts.	Rule was finalized and was scheduled to take effect 7/1/2026 – however, a district court vacated the rule nationwide, finding that it violated the Administrative Procedures Act.
Public Comment	HUD Funding & Mixed-Status Families	The County joined a public comment opposing a proposed regulatory change to housing assistance for mixed immigration status families. HUD proposed to rescind its policies allowing families to stay together in subsidized housing even if one family member might not qualify due to their immigration status. The proposed rule would require these families to separate or forgo funding.	California has the largest number of mixed-status families in the United States and California counties will bear the brunt of the negative social impacts of the proposed change.	This rule has not yet been finalized – if finalized, litigation opposing its implementation is expected
Public Comment	OMB Overhaul of Federal Grants	The County joined a public comment opposing proposed regulatory changes that fundamentally overhaul the federal grant-making rules, replacing a longstanding merit-based, competitive system with one that grants broad political discretion over funding decisions. The changes will reduce	The proposed rule change would impact all federal grants the county receives.	The County signed onto a public comment opposing the rule – the comment is comprehensive with an eye toward setting up future litigation over these changes.

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		transparency and accountability, create uncertainty for grant recipients, and jeopardize critical funding for programs and services on which communities rely.		
Public Comment	Sam.gov Verification Requirements	The County joined a public comment opposing a proposal to require virtually all federal funding recipients to make certain certifications regarding DEI, immigration, and national security policies when logging onto Sam.gov to access federal funding.	The proposed certification requirements would impact all federal funding the County receives.	The proposed changes have not been made effective – if finalized, litigation opposing the verification requirements is expected.
Public Comment	HUD Changes to Equal Access Rule	The County will join a public comment opposing regulatory changes that would replace the word “gender” with a narrow definition of “sex” throughout HUD regulations and allow discrimination based on gender identity. The proposed changes also contemplate efforts to preempt state and local laws protecting individuals from discrimination based on gender identity.	LGBTQIA+ residents who rely on housing resources will be immediately impacted by this rule, and the threat of preemption via regulation without clear congressional authorization threatens broader protection for LGBTQIA+ individuals throughout the County and State.	If finalized, litigation opposing implementation of these changes is expected.
Plaintiff in Litigation	<i>Santa Clara v. Noem</i> - FEMA/DHS Grant Terms	The County joined a lawsuit challenging the implementation of FY25 DHS/FEMA grant terms and conditions that would require recipients to comply with federal	The conditions threatened funding to departments with grants from DHS and FEMA – this includes the Sheriff, DEM,	A preliminary injunction was issued preventing these conditions from being enforced against the County. The FY26

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		priorities regarding DEI, immigration, and other Executive Orders.	EMS, Parks, Elections, and NCRIC.	NOFO includes similar terms and the Complaint will likely be amended to prevent implementation of these terms.
Plaintiff in Litigation	<i>King County v. Turner</i> – HUD/DOT/HHS Grant Terms	The County joined litigation challenging novel HUD/DOT/HHS grant terms and conditions that would require recipients to comply with certain conditions regarding DEI, immigration, and other federal priorities.	The conditions threatened funding to departments with grants from HUD, DOT, and HHS – this includes HSA, DPW, and Housing.	A preliminary injunction was issued preventing these conditions from being enforced against the County.
Plaintiff in Litigation	<i>SF v. Trump</i> – Sanctuary jurisdictions and Federal Funding	The County joined litigation opposing the DOJ directive to withhold federal funding for “sanctuary jurisdictions.”	The Administration’s actions threatened funding to departments with grants from HUD, DOT, and DHS. This includes the Sheriff, DEM, EMS, Elections, NCRIC, DPW, Housing, and HSA.	A preliminary injunction was issued preventing funding from being withheld from the County based on its sanctuary policies.
Amicus	<i>Barbara v. Trump</i> – Birthright Citizenship	The County signed onto an amicus brief along with 26 states and 106 local governments in opposition to the Trump Administration’s attempt to reinterpret the 14th Amendment such that persons born in the US are no longer automatically granted citizenship.	Local governments will bear the cost of the downstream impacts of this change, including spikes in poverty and public health and safety harms, as well as costs associated with building an administrative structure to determine	The Supreme Court upheld Birthright Citizenship.

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Amicus	<i>County of Santa Clara v. ICE – Gilroy Detention Center</i>	The County will sign onto an amicus brief in support of the County of Santa Clara & California’s litigation opposing the installation of a detention center in Gilroy, California.	The detention center will be built near the County and associated increases in enforcement activity will result in reduced labor capacity, decreased business activity, risks to public health, and increased absenteeism in primary and secondary education.	Litigation is ongoing.
Amicus	<i>U.S. v. City of Rochester – Sanctuary Policies</i>	The County signed onto an amicus along with 137 other local jurisdictions to support the City of Rochester’s defense of its sanctuary policy.	The County has similar sanctuary policies and shares Rochester’s goal of protecting the well-being of all its residents through such policies.	Litigation is ongoing.
Amicus	<i>U.S. v. Weber – Elections</i>	The County signed onto an amicus brief with multiple other counties and election officials supporting California’s opposition to the DOJ’s attempt to force the state to turn over its full unredacted voter registration list.	County residents would be impacted as their sensitive personal data is included in the voter registration list and local officials play a crucial role in maintaining voter rolls.	Litigation is ongoing.

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Evidentiary Support for Litigation	<i>New York v. DOJ – PRWORA Interpretation Changes</i>	The County provided evidentiary support in a lawsuit brought by several states, including California, opposing the Trump Administration’s new interpretation of the Personal Responsibility and Work Opportunity Reconciliation Act (“PRWORA”). The new interpretation would further restrict access to vital social services for some noncitizens while also imposing increased verification and compliance standards on local and state governments.	The rule changes would result in increased poverty and other negative downstream effects in the County. It would also impose burdensome verification requirements on a host of services that receive federal funding.	A preliminary injunction was issued blocking enforcement of the PRWORA interpretation in Plaintiff states.
Evidentiary Support for Litigation	<i>NAEH v. HUD – CoC Grant Terms and Conditions</i>	The County provided evidentiary support in a lawsuit brought by the National Alliances to End Homelessness challenging HUD’s decision to rescind and replace the Continuum of Care (“CoC”) NOFO. The proposal to rescind and replace the CoC NOFO threatened substantial funding received by HSA and Housing.	The changes threatened vital funding for HSA and Housing CoC programs and CoC partners.	A preliminary injunction was issued and HUD was held to their original NOFO. A supplemental complaint has been filed challenging the FY26 NOFO under the Administrative Procedures Act – any relief under this complaint will apply to the County.