

ORANGE COUNTY
CONTINUUM OF CARE BOARD MEETING
Wednesday, November 19, 2025
2:00 p.m. – 5:00 p.m.

Location:

**County Administration South (CAS) Building
County Conference Center
425 West Santa Ana Blvd. Room 104/106
Santa Ana, CA 92701-4599
[Click Here](#) for parking information.**

Virtual Meeting Option*:

**Zoom Meeting Link: [Click here for meeting link](#)
Join by phone: +1 669 444 9171
Webinar ID: 941 3616 4277**

****Listen-in option only***

AGENDA

Board Members

LaVal Brewer, South County Outreach
Judson Brown, City of Santa Ana
Dr. Kelly Bruno-Nelson, CalOptima Health
Andrew Crowe, Scholarship Prep
Nichole Gideon, Individual [Secretary]
Shakoya Green Long, Thomas House Family Shelter
Becks Heyhoe-Khalil, OC United Way
Marisol Johnson, Dayle McIntosh Center
Sandra Lozeau, City of Anaheim
Sammie MarTínez, Individual
Melanie McQueen, PATH

Dr. Tiffany Mitchell, Orangewood Foundation
Nishtha Mohendra, Families Forward [Vice Chair]
Robert “Santa Bob” Morse, Individual
Talesha Payne, Individual
Jason Phillips, Individual
Dawn Price, Friendship Shelter
Maricela Rios-Faust, Human Options
George Searcy, Individual
Tim Shaw, Individual
Dr. Shauntina Sorrells, Individual [Chair]

In compliance with the Americans with Disabilities Act, and County Language Access Policy, those requiring accommodation and/or interpreter services for this meeting should notify the Office of Care Coordination 72 hours prior to the meeting at (714) 834-5000 or email CareCoordination@ceo.oc.gov. Requests received less than 72 hours prior to the meeting will still receive every effort to reasonably fulfill within the time provided.

Supporting documentation is available for review by the public at least 72 hours prior to regular meetings and at least 24 hours prior to special meetings of the Continuum of Care (CoC) Board. Those wishing to review supporting documentation can visit the CoC Webpage [here](#) or the lobby of the County Administration North (CAN) Building, located 400 West Civic Center Drive, Santa Ana, CA 92701-4599, and request a copy of the

meeting materials from the Office of Care Coordination during normal business hours of 8:00 a.m. – 5:00 p.m. Monday through Friday (excluding holidays).

Call to Order – Nishtha Mohendra, Vice Chair

Board Member Roll Call – Nichole Gideon, Secretary

Public Comments: Members of the public may address the CoC Board on items listed within this agenda or matters not appearing on the agenda so long as the subject matter is within the jurisdiction of the CoC Board. Members of the public may address the CoC Board with public comments on agenda items in the business calendar after the agenda item presentation. Comments will be limited to three minutes. If there are more than five public speakers, this time will be reduced to two minutes. Members of the public utilizing interpreter services will be given double the amount of time to provide public comment.

To address the CoC Board, members of the public who are attending in person are to complete a Request to Address the CoC Board form prior to the beginning of each agenda item and submit it to CoC Board staff. Staff will call your name in the order received.

Members of the public, including those listening in via the virtual meeting option, may also submit public comment by emailing CareCoordination@ceo.oc.gov. All comments submitted via email at least 24 hours before the start of the CoC Board meeting will be distributed to the CoC Board members for their consideration and all comments submitted prior to the meeting will be added to the administrative records of the meeting. Please include “CoC Board Meeting Comment” in the email subject line.

Board Member Comments: Members of the CoC Board may provide comments on matters not appearing on the agenda so long as the subject matter is within the jurisdiction of the CoC Board.

CONSENT CALENDAR

1. Receive and file the CoC Strategic Plan monthly update.

BUSINESS CALENDAR

1. **Orange County CoC Fiscal and Resource Mapping Ad Hoc** – Meadow Robinson, Sr. Directing Attorney – Team Lead, Homebase; Riley Meve, Policy Analyst, Homebase and Felicia Boehringer, Interim CoC Manager, Office of Care Coordination
 - a. Appoint Allison Davenport, Sandra Lozeau, Stacy Lumley, Sammie MarTínez, Melanie McQueen, Maricela Rios-Faust, Ami Rowland, Tim Shaw and Mishaun Watkins to the Fiscal and Resource Mapping Ad Hoc.
2. **Homeless Housing, Assistance and Prevention (HHAP) Program** – Douglas Becht, Director and Zulima Lundy, Director of Operations, Office of Care Coordination
 - a. Update on Request for Proposals for Services Coordination, Permanent Housing Delivery, and Prevention and Shelter Diversion Services.
 - b. Update on HHAP Round 6 application and budget.
 - c. Approve the recommended HHAP Memorandum of Understanding (MOU) between the Orange County CoC, County of Orange, City of Anaheim, City of Irvine, City of Santa Ana for Round 6 of HHAP commitment to partnership and participation in a regionally coordinated homelessness action plan.

3. **2026 Orange County Point In Time Count** – Matt Bates, Chief Operating Officer; Ryan Guevara, Census Data Specialist and Stephen Su, Census Data Specialist, City Net
4. **Fiscal Year (FY) 2025 CoC Program Funding** – Felicia Boehringer, Interim CoC Manager, and Zulima Lundy, Director of Operations, Office of Care Coordination
 - a. Update on FY 2025 CoC Competition and Youth Homeless Demonstration Program (YHDP) Grants Notice of Funding Opportunity (NOFO)
 - b. Approve recommended changes to Coordinated Entry System (CES) Policies and Procedures to update the Prioritization Policy to include households enrolled in Permanent Supportive Housing programs that are at-risk of experiencing homelessness as a result of decreased CoC Program funding to be considered for other housing opportunities, with the goal of maintaining housing stability; and continue working with the CoC to improve upon the recommended changes to the Prioritization Policy and return to the CoC Board for additional approvals.
 - c. Delegate authority to the Office of Care Coordination, as the Collaborative Applicant, to act in the best interest of the Orange County CoC based on the timeline of the NOFO, which requires an expedited submission process.
5. **Homeless Management Information System (HMIS) Data Requests** – Erin DeRycke, Director, Data Analytics, 2-1-1 Orange County (211OC), Orange County United Way; Chairman Doug Chaffee, Fourth District Supervisor; Junellen Dillard, Policy Advisor/Field Representative, Office of Chairman Doug Chaffee; and Douglas Becht, Director, Office of Care Coordination
 - a. Approve the Office of Chairman Doug Chaffee, Fourth District, HMIS data request for the period of November 1, 2024, through October 31, 2025, for a one-time export of aggregate data to be used for the Emergency Rental Assistance Program (ERAP) administered by District 4.
 - b. Approve the Office of Care Coordination’s HMIS data request beginning January 1, 2023, and ongoing, for client-level data for the purpose of conducting a cross-referencing analysis with records from the Orange County Sheriff’s Departments to determine whether persons experiencing homelessness were engaged with the Homeless Response System prior to their death, to be reported aggregately.
6. **Orange County CES Evaluation** – Dr. Shauntina Sorrells, Chief Program Officer, Samueli Foundation
 - a. Update on the Orange County CES Evaluation.
 - b. Authorize the Office of Care Coordination, as the CES Lead and CoC Administrative Entity, and Orange County United Way, as the HMIS Lead, to work with the selected consultant and provide all needed, relevant data to carry out the Orange County CES evaluation.
 - c. Approve the final report and summary of the Orange County CES Evaluation be presented to the CoC Board.
7. **Policies, Procedures and Standards (PPS) Committee Recommendations** – Nishtha Mohendra, PPS Committee Chair and Felicia Boehringer, Interim CoC Manager, Office of Care Coordination
 - a. Approve the proposed 2 for 1 Match Policy as recommended by the Coordinated Entry System (CES) Steering Committee and Lived Experience Advisory Committee, as a time-limited pilot for up to six (6) months, inclusive of a review at three (3) months, with a report of data evaluation returned to the PPS Committee no later than March 2026, as recommended by the PPS Committee.
8. **2025 CoC Board Nomination and Election Update** – Felicia Boehringer, Interim CoC Manager, Office of Care Coordination
9. **Next Meeting:** Wednesday, December 17, 2025, from 2:00 p.m. – 5:00 p.m.

Orange County CoC Strategic Plan:

Monthly Progress Update

Strategic Plan Progress Reporting Month: October 2025

CoC Board Meeting Date: 11/19/25

CoC Strategic Plan Background: Finalized by the CoC Board in September 2025, the Orange County CoC Strategic Plan outlines the Orange County CoC's strategic aims, objectives, goals, and actions from October 1, 2025 – September 30, 2028. Implementation is currently being managed by Aubrey Sitler (ACStrategies). This monthly progress update aims to provide transparency and accountability for the current strategies of focus.

General Update: Strategy owners were asked to start providing brief progress updates for the previous month by the 7th of each month. For October, they were asked to develop milestones, or communicate if they needed support or more time to complete those milestones. As the first month of action on the Strategic Plan, it is expected that some strategies were able to pick up and move more quickly than others. Aubrey will continue working directly with strategy owners to offer capacity, thought partnership, and other support as needed.

Strategy	Owner(s)	Current Status	Progress Notes
1: Staff Training	Andrew Crowe, SantaBob	Running behind	Initial milestones not yet set. Aubrey working with owners to identify support needs and next steps.
2: Coordinated Investment Planning	Felicia Boehringer	On track; one milestone delayed	Milestones are documented and match the contract with Homebase. Ad Hoc formation was delayed due to lack of time at the October Board meeting but is slated for November Board meeting.
3: Support for People with Lived Experience	Felicia Boehringer	On track	Initial milestones set. OCUW is fully responsible for compensating people with lived expertise as of October, as the contracted entity. Working with OCUW on YAB planning and recruitment in November.
4: Policy Agenda	Becks Heyhoe-Khalil	Running behind	Milestones not yet set. Aubrey working with Board Officers and proposed owner to solidify next steps and plan for November.

Strategy	Owner(s)	Current Status	Progress Notes
5: Improve Data Collection & Analysis	Melanie McQueen	On track	Initial milestones set. Planning to bring to the next SPF.
6: Written Standards	Tiffany Mitchell, Maricela Rios-Faust	On track	Planning to set initial milestones in November
7: CES Evaluation	Shauntina Sorrells, Nishtha Mohendra	On track	Initial milestones set. CES eval RFP closed in October; received an excellent pool of 8 responses. Planning to provide an update at November CoC Board meeting and finalize a contract in November.
8: Evaluation of Key Partners	Tim Shaw	On track	Initial milestones drafted. Plans to start collaboratively working toward milestones starting in November.
9: Manage & Implement Strategic Plan	Aubrey Sitler	On track	Actively coordinating with owners to ensure alignment and progress on their strategies.

Date: November 19, 2025

Subject: Orange County Continuum of Care (CoC) Fiscal and Resource Mapping Ad Hoc

Recommended Action:

- a. Appoint Allison Davenport, Sandra Lozeau, Stacy Lumley, Sammie MarTínez, Melanie McQueen, Maricela Rios-Faust, Ami Rowland, Tim Shaw and Mishaun Watkins to the Fiscal and Resource Mapping Ad Hoc.

Background

As federal and state government departments continue to expand the role of CoCs in addressing homelessness and incentivize CoCs to enter strategic partnerships, there is a need for continued planning and strategic efforts by the CoC and Orange County CoC Board on how to best allocate resources and funding to benefit the populations experiencing homelessness at disproportionate rates. As such, the Office of Care Coordination, as the Administrative Entity for the Orange County CoC, was asked by the CoC Board to launch a fiscal and resource mapping initiative. The goal is to gain a better understanding of the funding and resources available within the Orange County homeless service system, identify funding gaps, and inform strategic investment in homeless service programming; particularly in emergency shelter and permanent housing resources, through future funding opportunities. The strategy aligns with the need for fiscal and resource mapping included in the CoC Strategic Plan, identified as a priority focus area.

To move the initiative forward, the Office of Care Coordination selected Homebase as a consulting group with proven expertise of mapping exercises activities related to this work and for other communities. On August 26, 2025, the Orange County Board of Supervisors approved a contract between the Office of Care Coordination and Homebase to provide essential technical assistance and consulting services in support of the fiscal and resource mapping of the CoC, primarily focusing on the CoC's key funding sources: CoC Program, Emergency Solutions Grant (ESG) Program, and Homeless Housing, Assistance and Prevention (HHAP) Program funding. Homebase will roll out the project in a five-phased approach, which will include an outlined timeline of activities, develop an ad hoc to guide and support the initiative, create avenues for community outreach and stakeholder engagement, collect and analyze information received, and provide a final report of the findings of the fiscal and resource mapping exercise.

Homebase will facilitate the five-phased approach as detailed below:

Phase 1: Planning – Homebase will be working and meeting collaboratively with the Office of Care Coordination to develop a workplan and timeline of activities for the project.

Phase 2: Implementation – Ad Hoc and Community Engagement: Homebase will assist the Office of Care Coordination in establishing an ad hoc committee that will guide and support implementation of fiscal and resource mapping activities of the project.

Phase 3: Implementation – Community Engagement Sessions: Homebase will assist the Office of Care Coordination to guide planning for engagement of other stakeholders through in-person and virtual community workshops and engagement sessions.

Phase 4: Implementation – Data Gathering and Analysis: Homebase will assist the Office of Care Coordination to identify and request necessary data and information for the fiscal and resource mapping process and will do an analysis to identify any gaps in information that may be needed.

Phase 5: Final Report and Recommendations - Homebase will prepare a final report and assist the Office of Care Coordination on presenting the results of the fiscal and resource mapping project implementation. Homebase will coordinate with the CoC Board and its related committees at the direction of the Office of Care Coordination.

At the September 24, 2025, CoC Board meeting, as part of Phase 1, Homebase provided a presentation to kick off the initiative, highlighting an initial survey that would be shared with CoC Board members to understand the goals and priorities. As part of Phase 2, the CoC Board directed the Office of Care Coordination to return with a list of proposed members of the CoC Fiscal and Resource Mapping Ad Hoc (Ad Hoc), to be reviewed and approved at the October 22, 2025, CoC Board meeting. The Office of Care Coordination, in collaboration with Homebase, developed a list of potential members that would ensure a comprehensive representation of backgrounds and experiences that are reflective of the homeless services system in Orange County. Initial outreach was conducted to nine individuals. At the October 22, 2025, CoC Board meeting, a recommendation to appoint Allison Davenport, Sandra Lozeau, Sammie MarTínez, Melanie McQueen, Maricela Rios-Faust, Tim Shaw and Mishaun Watkins to the ad hoc, and to work with the CoC Board Officers to confirm up to two (2) additional members to ensure alignment to the project timeline proposed by Homebase. Due to time constraints during the CoC Board meeting, the item was delayed to the November 19, 2025, meeting.

Following the October CoC Board meeting, the Office of Care Coordination was able to confirm the additional two members to recommend to the CoC Board for appointment. All members who confirmed interest in joining the Ad Hoc are reflected in the table below.

Name	Affiliation	Representation
Allison Davenport	Mercy House	Individual and Family Service Provider*
Sandra Lozeau	City of Anaheim	Large City, Public Housing Authority, Homeless Services Programming
Stacy Lumley	City of Laguna Niguel	South service planning area, Small City
Sammie MarTínez	CoC Board	Lived expertise, CoC Board member, Domestic Violence Committee member
Melanie McQueen	PATH	Individual Service Provider**
Maricela Rios-Faust	Human Options	Domestic Violence Service Provider, Housing Provider for Survivors

Ami Rowland	Covenant House California	Transitional Aged Youth Service Provider
Tim Shaw	CoC Board	CoC Board member
Mishaun Watkins	City of Santa Ana	Large City, Public Housing Authority, Homeless Services Programming

*Permanent Supportive Housing, Emergency Shelter

**Outreach, Emergency Shelter, Rapid Rehousing

The establishment and appointment of a CoC Fiscal and Resource Mapping Ad Hoc will guide and support the Office of Care Coordination to implement fiscal and resource mapping activities, such as exploring formats and tools that may be used, identifying system partners and stakeholders, coordinating outreach plans, reviewing and analyzing data, and identifying gaps and priorities for funding.

Date: November 19, 2025

Subject: Homeless Housing, Assistance and Prevention (HHAP) Program

Recommended Action:

- c. Approve the recommended HHAP Memorandum of Understanding (MOU) between the Orange County CoC, County of Orange, City of Anaheim, City of Irvine, City of Santa Ana for Round 6 of HHAP commitment to partnership and participation in a regionally coordinated homelessness action plan.

Background

The HHAP Program is a grant administered by the California Department of Housing and Community Development (HCD). The HHAP Program provides local jurisdictions with funds to support regional coordination to expand or develop local capacity to address their immediate homelessness challenges as well as prevent and end to homelessness in their communities, including but not limited to projects related to rental assistance and rapid rehousing, operating subsidies, landlord incentives, outreach and coordination, prevention and shelter diversion into permanent housing and capital improves for the development of new navigation centers and emergency shelters.

The Office of Care Coordination serves as Administrative Entity for HHAP Program funding allocated to the County of Orange (County) and Orange County Continuum of Care (CoC), supporting with the facilitation of the HHAP Program applications for each round of funding.

The HHAP Round 6 Notice of Funding Availability (NOFA) was made available in February 2025. The application was due on August 29, 2025. The Office of Care Coordination as the Administrative Entity completed the HHAP Round 6 grant application on behalf of the County and CoC and worked alongside the Cities of Anaheim, Irvine, and Santa Ana as regions were required to apply together and submit a single Regionally Coordinated Homelessness Action Plan. For the development of the HHAP Round 6 application and the Regionally Coordinated Homelessness Action Plan, community listening sessions and presentations were planned and hosted on the following dates:

- City of Santa Ana Community Listening Session: Monday, July 7, 2025
- City of Anaheim Community Listening Session: Tuesday, July 8, 2025
- County's Community Listening Session: Thursday, July 10, 2025

The Regionally Coordinated Homelessness Action Plan is required to reflect the following components:

- Identification and analysis of the specific roles and responsibilities of each participating jurisdiction in the region regarding outreach and site coordination, siting and use of available land, the development of shelter, interim, and permanent housing options, and the coordination and connection to the delivery of services to individuals experiencing homelessness, or at risk of experiencing homelessness, including specifying roles and coordination plans in relation to Mental Health Services Act and Behavioral Health Services Act, within the region, and policies for addressing encampments.

- Status updates on critical roles and responsibilities including housing element compliance, housing element implementation, pro-housing designation, housing law violations, surplus land, and submission of annual progress reports.
- Most recent system performance measures for the region and a system performance and improvement plan, which shall include a description of key actions the region intends to take to improve the system performance measures.

For the Orange County region, the HHAP Round 6 application required an MOU between the Cities of Anaheim, Irvine and Santa Ana, Orange County CoC, and the County. The MOU commits all signatories to participate in and comply with the Regionally Coordinated Homelessness Action Plan and certifies that all Eligible Applicants and subgrantees will employ the core components of Housing First. The goal of the MOU is to ensure that all HHAP-funded entities communicate, work collaboratively, and leverage, whenever possible, available resources to maximize impact and serve the greatest number of households experiencing homelessness. This commitment aligns with recent efforts to work with and leverage opportunities to address homelessness and requires countywide collaborative efforts. This MOU will meet HCD's best practice requirement of establishing a regional MOU with detailed commitments that focus on coordinating and integrating interim and permanent housing resources, supportive services, and outreach and engagement strategies as noted in the document that the Office of Care Coordination signed in, and which was agreed upon during the HHAP Round 6 application process.

The Office of Care Coordination worked with the Cities of Anaheim, Irvine, and Santa to develop an MOU that commits to participation and compliance with the Regionally Coordinated Homelessness Action Plan. The final HHAP Round 6 MOU between the Orange County CoC, the County of Orange, City of Anaheim, City of Irvine, and the City of Santa Ana can be referenced in **Attachment A**.

In late September 2025, HCD completed its review of the Orange County CoC's HHAP Round 6 application and provided a list of amendments that were required to be addressed and submitted to HCD by October 29, 2025. The Office of Care Coordination as the Administrative Entity worked alongside the Cities of Anaheim, Irvine, and Santa Ana to address and submit the requested amendments to HCD prior to the deadline.

Approval of the HHAP Round 6 MOU between the Orange County CoC, the County of Orange, City of Anaheim, City of Irvine, and the City of Santa Ana will ensure that the regions are compliant with HHAP Round 6 application requirements and ensure commitment to participation and compliance with the Regionally Coordinated Homelessness Action Plan.

Attachments

Attachment A – HHAP Round 6 Memorandum of Understanding between the Orange County CoC, the County of Orange, City of Anaheim, City of Irvine, and the City of Santa Ana

**MEMORANDUM OF UNDERSTANDING
BETWEEN
THE ORANGE COUNTY CONTINUUM OF CARE,
THE COUNTY OF ORANGE,
THE CITY OF ANAHEIM,
THE CITY OF IRVINE,
AND THE CITY OF SANTA ANA
FOR ROUND 6 OF THE HOMELESS HOUSING, ASSISTANCE AND PREVENTION PROGRAM
COMMITMENT TO PARTNERSHIP AND PARTICIPATION IN A REGIONALLY COORDINATED HOMELESSNESS
ACTION PLAN**

This Memorandum of Understanding (MOU) is entered into, by and between the County of Orange (County), acting as the Administrative Entity for the County of Orange and the Orange County Continuum of Care (CoC); the City of Anaheim; the City of Irvine; and the City of Santa Ana. The Orange County CoC, County, City of Anaheim, City of Irvine, and City of Santa Ana may be referred to individually as “Party” and collectively as “Parties.”

RECITALS

WHEREAS, on February 24, 2025, the California Department of Housing and Community Development (HCD) announced the availability of the Homeless Housing, Assistance and Prevention (HHAP) Round 6 (HHAP-6) grant funding; and

WHEREAS, the general purpose of HHAP-6 is to create and implement a Regionally Coordinated Homelessness Action Plan that organizes and deploys the full array of homelessness programs and resources comprehensively and effectively; and

WHEREAS, the HCD Notice of Funding Availability (NOFA) identifies the Orange County CoC, the County, the City of Anaheim, the City of Irvine, and the City of Santa Ana as eligible applicants for the HHAP-6 grant funding. HCD requires eligible applicants to apply jointly as part of a “region”. “Region” is further defined in the NOFA as the geographic area served by the county including all cities and CoCs within it; and

WHEREAS, the HHAP-6 grant funding requires the submission of a Regionally Coordinated Homelessness Action Plan, amongst other documents, including this MOU; and

WHEREAS, by entering into this MOU, the Parties intend to participate in and comply with the Regionally Coordinated Homelessness Action Plan and commit to uphold, participate in, and comply with the actions, roles, and responsibilities of each Party as described in the HHAP-6 Regionally Coordinated Homelessness Action Plan and summarized below;

NOW, THEREFORE, the Parties mutually agree as follows:

ARTICLE I

The Parties acknowledge and hereby commit to participate and comply with the actions, roles and responsibilities of the Regionally Coordinated Homelessness Action Plan, which is incorporated by reference herein and made a part of this MOU as Attachment I. The Parties’ agreement and commitments to the Regionally Coordinated Homelessness Action Plan are summarized below and shall constitute the entire MOU between the Parties.

1. The roles and responsibilities of each Party within the Orange County Region, as specified in Section 3.a. in Attachment I, for outreach and site coordination, siting and use of available public land, the development of interim and permanent housing options, and coordinating, connecting, and delivering services to people experiencing homelessness or at risk of experiencing homelessness within the Orange County Region are summarized below:
 - a. Outreach and Site Coordination
 - i. The Orange County CoC will invest and expand outreach and coordination services for people experiencing unsheltered homelessness with the goal of connecting them to emergency shelter, housing, and/or other supportive services.
 - ii. The County will continue to fund regional care coordination services, which provides targeted street outreach and engagement strategies for individuals experiencing unsheltered homelessness and will continue to facilitate discussions on how to best improve coordination amongst the County, cities and community-based organizations to strengthen regional capacity and collaboration in the delivery of services.
 - iii. The City of Anaheim will continue to fund an array of housing solutions to ensure resources are available to serve the needs of unsheltered people, while continuing to fund outreach to promote linkage.
 - iv. The City of Irvine will provide s-outreach and engagement to people at risk of or experiencing homelessness to provide connection to an array of services.
 - v. The City of Santa Ana will continue to provide outreach and engagement services to unsheltered individuals and will exit homeless individuals from the streets by linking persons to shelter and housing within their jurisdiction.
 - b. Land Use and Development
 - i. The Orange County CoC has no direct role or responsibility as it relates to land use and development; however, the Orange County CoC will continue to work collaboratively to support the Parties in fulfilling their land use and development roles and responsibilities.
 - ii. The County will continue to identify available land and support development opportunities with the County jurisdiction and support the County's Housing Funding Strategy, which prioritizes the development of permanent supportive housing and affordable housing for people experiencing or exiting homelessness.
 - iii. The City of Anaheim will continue to identify, acquire, and develop available land and structures in the city including prioritizing opportunities to dedicate units to households experiencing or exiting homelessness while partnering with housing developers.
 - iv. The City of Irvine will identify city-controlled property that can be made available to promote housing opportunities to meet the needs of vulnerable populations.
 - v. The City of Santa Ana will also continue to identify, acquire, and develop available land and structures in the city including prioritizing opportunities to dedicate units to households experiencing or exiting homelessness
 - c. Development of Interim and Permanent Housing Options

- i. The Orange County CoC will continue to work collaboratively with the Parties to support them in the development of interim and permanent housing options and invest in services for people experiencing or at-risk of experiencing homelessness that provide interim and permanent housing options.
 - ii. The County will continue to invest in services for people experiencing or at-risk of experiencing homelessness that provide interim and permanent housing options.
 - iii. The City of Anaheim will continue to prioritize increasing access to permanent affordable and supportive housing in the community, including incorporation of funding that would bolster development either through entitlement allocations or grant opportunities that arise. The City of Anaheim will also continue its work with the Anaheim Housing Authority.
 - iv. The City of Irvine will continue to prioritize expanding access to affordable and supportive housing in the community by leveraging a variety of funding options, including entitlement allocations, grant opportunities, and other strategic investments to support development.
 - v. The City of Santa Ana will continue to prioritize access to permanent affordable and supportive housing in the community through a variety of funding options and investments. The City of Santa Ana will continue to work with the Santa Ana Housing Authority.
- d. Coordination of and Connection to Service Delivery
 - i. The Orange County CoC will continue to strengthen collaboration with Service Providers and stakeholders, including those with lived experience, transitional aged youth, and veterans and emphasize the utilization of the Homeless Management Information System and the expansion of the Coordinated Entry System (CES) to support coordination practices that improve the delivery of services.
 - ii. The County will continue to invest in services for people experiencing or at-risk of experiencing homelessness, including regional street outreach and engagement coordination, homelessness diversion and prevention strategies and programming, interim and permanent housing solutions.
 - iii. The City of Anaheim will continue to improve and expand on the network of homeless services in the city including evaluating gaps in services and barriers to engagement in existing services.
 - iv. The City of Irvine will continue to connect individuals experiencing homelessness or those at risk of homelessness to CalAIM services while forming partnerships with providers.
 - v. The City of Santa Ana will continue to work with service providers that deliver housing navigation services and resources to those who are housing insecure while coordinating and delivering a wide range of services through community partnerships.
- e. Addressing Encampments
 - i. Parties will work to ensure that efforts to address encampments comply with the California Interagency Council on Homelessness (Cal ICH) Guidance on Addressing Encampments.

2. The Parties' roles and responsibilities for Key Actions, as specified in Section 3.b. in Attachment I, to improve the system performance measures are described below:
 - a. Number of people experiencing homelessness who are accessing services.
 - i. Parties will invest in street outreach and engagement strategies, including regional care coordination services and partnerships with specialized outreach teams, with a focus on reducing homelessness for those exiting an institution such as hospitals, jails and prisons.
 - ii. Parties will invest in permanent housing solutions, such as rapid rehousing programs and affordable housing development that assist people transition from homelessness into permanent housing and homelessness prevention programs.
 - iii. Parties will invest in services coordination activities, including but not limited to programs that provide compensation to people with lived experience of homelessness, programs that support the CES activities, and life skills training programs.
 - iv. The Orange County CoC and the County will invest in the Homeless Management Information System (HMIS) to support HMIS administration activities and strengthen the infrastructure of the homeless service system.
 - b. Number of people experiencing unsheltered homelessness on a single night.
 - i. Parties will invest in street outreach and engagement strategies, including regional care coordination services and partnerships with specialized outreach teams, with a focus on reducing homelessness for those exiting an institution such as hospitals, jails and prisons.
 - ii. Parties will invest in the critical infrastructure of emergency shelters serving individuals, families, transitional aged youth, and survivors of domestic violence and their operations.
 - iii. The Orange County CoC and the County will invest in the HMIS to support HMIS administration activities and strengthen the infrastructure of the homeless service system.
 - c. Number of people accessing services who are experiencing homelessness for the first time.
 - i. Parties will invest in services coordination activities, including but not limited to programs that provide compensation to people with lived experience of homelessness, programs that support the CES activities, and life skills training programs.
 - ii. The Orange County CoC and County will invest in the HMIS to support HMIS administration activities and strengthen the infrastructure of the homeless service system.
 - d. Number of people exiting homelessness into permanent housing.
 - i. Parties will invest in permanent housing solutions, such as rapid rehousing programs and affordable housing development that assist people transition from homelessness into permanent housing and homelessness prevention programs.
 - ii. The Orange County CoC and County will invest in the HMIS to support HMIS administration activities and strengthen the infrastructure of the homeless service system.

- e. Average length of time that people experienced homelessness while accessing services.
 - i. Parties will invest in street outreach and engagement strategies, including regional care coordination services and partnerships with specialized outreach teams, with a focus on reducing homelessness for those exiting an institution such as hospitals, jails and prisons.
 - ii. Parties will invest in permanent housing solutions, such as rapid rehousing programs and affordable housing development that assist people transition from homelessness into permanent housing and homelessness prevention programs.
 - iii. Parties will invest in the critical infrastructure of emergency shelters serving individuals, families, transitional aged youth, and survivors of domestic violence and their operations.
 - iv. The Orange County CoC and County will invest in the HMIS to support HMIS administration activities and strengthen the infrastructure of the homeless service system.
 - f. Percent of people who return to homelessness within six (6) months of exiting the homelessness response system to permanent housing.
 - i. Parties will invest in permanent housing solutions, such as rapid rehousing programs and affordable housing development that assist people transition from homelessness into permanent housing and homelessness prevention programs.
 - ii. Parties will invest in the critical infrastructure of emergency shelters serving individuals, families, transitional aged youth, and survivors of domestic violence and their operations.
 - iii. The Orange County CoC and the County will invest in the HMIS to support HMIS administration activities and strengthen the infrastructure of the homeless service system.
 - g. Number of people with successful placements from street outreach projects.
 - i. Parties will Invest in street outreach and engagement strategies, including regional care coordination services and partnerships with specialized outreach teams, with a focus on reducing homelessness for those exiting an institution such as hospitals, jails and prisons.
 - ii. The Orange County CoC and the County will invest in the HMIS to support HMIS administration activities and strengthen the infrastructure of the homeless service system.
3. The Parties' roles and responsibilities for Key Actions as specified in Section 3.b. in Attachment I to ensure racial and gender equity in implementation of each Key Action detailed below:
- a. Key Action 1: Invest in street outreach and engagement strategies, including regional care coordination services and partnerships with specialized outreach teams, with a focus on reducing homelessness for those exiting an institution such as hospitals, jails and prisons.
 - i. Parties will prioritize culturally responsive and trauma-informed outreach and engagement strategies to better serve racial and gender groups disproportionately affected by homelessness and incarceration. Outreach teams will include staff who reflect the community's racial, ethnic, and gender diversity and receive ongoing training on implicit bias, anti-racism, and gender sensitivity. Data collection via HMIS and CES will be analyzed to monitor equitable access and

- outcomes. Partnerships with culturally specific organizations will ensure services are accessible and respectful of diverse backgrounds.
- ii. Parties will work to ensure housing navigation and placement efforts will implement equity-focused prioritization within CES policies to ensure overrepresented racial and ethnic groups, including Indigenous peoples, Black/African American, Latinx, and LGBTQ+ (lesbian, gay, bisexual, transgender, queer or questioning, and more) individuals, receive timely access to interim and permanent housing options. The Key Action will track placement rates and adjust outreach and referral strategies to reduce disparities. Engagement with landlords and housing developers to expand culturally affirming housing options will be prioritized.
 - iii. Parties will work to ensure that case management will be individualized and trauma-informed, with wraparound services such as mental health care, substance use treatment, and peer support that are sensitive to cultural and gender needs.
 - iv. Parties will monitor data to identify and intervene early in cases where retention disparities appear.
 - v. Parties will work to implement requests for proposals (RFPs) will include equity criteria and scoring that reward culturally competent service models
- b. Key Action 2: Invest in permanent housing solutions, such as rapid rehousing programs and affordable housing development that assist people transition from homelessness into permanent housing and homelessness prevention programs.
- i. Parties will implement culturally responsive and trauma-informed approaches to service delivery, ensuring staff receive ongoing training on implicit bias, cultural humility, and gender sensitivity. Outreach and engagement strategies will prioritize historically underserved and overrepresented populations.
 - ii. Parties will work to address inequities in housing placements by establishing targeted referral pathways and prioritization criteria that focus on those disproportionately impacted by homelessness.
 - iii. Parties will promote equitable housing retention by providing culturally competent case management and wraparound supportive services that address specific needs related to race, gender, and trauma history.
 - iv. Parties will work to implement equity-focused procurement policies that evaluate vendors on their capacity to deliver equitable outcomes and commitment to diversity, equity, and inclusion.
- c. Key Action 3: Invest in the critical infrastructure of emergency shelters serving individuals, families, transitional aged youth, and survivors of domestic violence and their operations. racial and gender equity in housing retention.
- i. Parties will prioritize culturally responsive and trauma-informed service delivery within emergency shelters by investing in staff training focused on implicit bias, cultural humility, and gender sensitivity. Shelter operations will implement tailored engagement strategies to meet the unique needs of overrepresented groups, women, and gender-diverse individuals, including survivors of domestic violence and transitional aged youth.

- ii. Parties will work to strengthen CES to ensure transparent, fair, and prioritized referrals that address systemic barriers faced by racial and ethnic minorities and gender-diverse populations. Data-driven decision-making will monitor placement rates by demographic groups to identify and address disparities.
 - iii. Parties will ensure that programs integrate supportive services, including behavioral health, case management, and peer support, that are culturally competent and gender affirming.
 - iv. Parties will work to incorporate equity-focused procurement policies for shelter infrastructure projects, technology vendors, and service providers.
 - d. Key Action 4: Invest in services coordination activities, including but not limited to programs that provide compensation to people with lived experience of homelessness, programs that support the CES activities, and life skills training programs.
 - i. Parties will prioritize culturally responsive and trauma-informed service delivery by incorporating training for all staff and peer specialists on implicit bias, cultural humility, and gender sensitivity.
 - ii. Parties will use data-driven approaches to monitor placement outcomes, identifying disparities and informing corrective actions.
 - iii. Parties will support ongoing, culturally competent case management and peer support that address the specific challenges faced by overrepresented populations, including trauma, discrimination, and systemic inequities.
 - iv. Parties will work to implement equity-focused procurement policies will be adopted to increase contracting opportunities for disadvantaged business enterprises.
 - e. Key Action 5: Invest in the HMIS to support HMIS administration activities and strengthen the infrastructure of the homeless service system.
 - i. Parties will work to expand HMIS functionality to capture more detailed demographic and needs-based data, so that providers will be able to identify disparities in service access and tailor outreach to underrepresented groups disproportionately experiencing homelessness.
 - ii. Parties will work to Improve data quality and follow-up tracking within HMIS will make it possible to monitor housing retention rates by demographic group.
 - iii. Parties will work to integrate equity requirements into vendor and subrecipient procurement processes for HMIS administration and related services.
- 4. The parties will ensure that programs and projects funded with HHAP-6 are consistent with Housing First and that all subgrantees will employ the required core components of Housing First, per HSC section 50241(f).

ARTICLE II

Term. This MOU shall become effective upon signing by all Parties and shall terminate on June 30, 2029, unless extended in whole or in part by all Parties, as provided in this MOU.

ARTICLE III

Fiscal. There shall be no remuneration between the Parties related to the execution and implementation of the terms of this MOU.

ARTICLE IV

Changes to the MOU. This MOU may be amended, including amendments that incorporate future HHAP-6 requirements that may be requested by HCD, by mutual consent of the Parties, hereto. Said amendments shall become effective only when in writing and fully executed by duly authorized officers of the Parties hereto.

ARTICLE V

Authorized Signatories. The Parties to this MOU represents that the undersigned individuals executing this MOU on their respective behalf are fully authorized to do so by law or other appropriate instrument and to bind upon said Parties to the obligations set forth herein.

IN WITNESS WHEREOF, the parties hereto have executed this MOU as of the last date and year written below.

ORANGE COUNTY CONTINUUM OF CARE

By: _____

Dr. Shauntina Sorrells

Chair

Orange County Continuum of Care

Dated: _____

By: _____

Douglas Becht

County of Orange, County Executive Office

Office of Care Coordination

Dated: _____

Approved As To Form

CEO Counsel

County of Orange, California

By: _____

Deputy

Dated: _____

COUNTY OF ORANGE

By: _____

Douglas Becht

County of Orange, County Executive Office

Office of Care Coordination

Dated: _____

Approved As To Form

CEO Counsel

County of Orange, California

By: _____

Deputy

Dated: _____

CITY OF ANAHEIM

ATTEST:

THERESA BASS
City Clerk

Dated: _____

CITY OF ANAHEIM

JAMES VANDERPOOL
City Manager

Dated: _____

APPROVE AS TO FORM:

RYAN HODGE
Deputy City Attorney

Dated: _____

RECOMMENDED FOR APPROVAL:

GRACE RUIZ-STEPTER
Director
Dept of Housing and Community Development

Dated: _____

CITY OF IRVINE

CITY OF IRVINE,
a California municipal corporation

Dated: _____

By: _____
Sean P. Crumby, Interim City Manager

APPROVED AS TO FORM:
RUTAN & TUCKER, LLP

Jeffrey T. Melching, City Attorney

ATTEST:

Carl Petersen, City Clerk

CITY OF SANTA ANA

ATTEST:

JENNIFER L. HALL
City Clerk

Dated: _____

APPROVED AS TO FORM:

SONIA R. CARVALHO
City Attorney

By: _____
Andrea Garcia-Miller
Senior Assistant City Attorney

CITY OF SANTA ANA

ALVARO NUNEZ
Acting City Manager

Dated: _____

RECOMMENDED FOR APPROVAL:

MICHAEL GARCIA
Executive Director
Community Development Agency

Date: November 19, 2025

Subject: Fiscal Year (FY) 2025 Continuum of Care (CoC) Program Funding

Recommended Actions:

- a. Update on FY 2025 CoC Competition and Youth Homeless Demonstration Program (YHDP) Grants Notice of Funding Opportunity (NOFO)
- b. Approve recommended changes to Coordinated Entry System (CES) Policies and Procedures to update the Prioritization Policy to include households enrolled in Permanent Supportive Housing programs that are at-risk of experiencing homelessness as a result of decreased CoC Program funding to be considered for other housing opportunities, with the goal of maintaining housing stability; and continue working with the CoC to improve upon the recommended changes to the Prioritization Policy and return to the CoC Board for additional approvals.
- c. Delegate authority to the Office of Care Coordination, as the Collaborative Applicant, to act in the best interest of the Orange County CoC based on the timeline of the NOFO, which requires an expedited submission process.

Background

FY 2025 CoC Competition and YHDP Grants NOFO

The U.S. Department of Housing and Urban Development (HUD) formerly released an annual Notice of Funding Opportunity (NOFO) that allowed CoCs nationwide to apply for competitive funding. In 2024, for the first time, HUD issued a two-year CoC Program NOFO as authorize by the Consolidated Appropriations Act, 2024. CoCs were only required to submit one CoC Consolidated Application to be applicable for Fiscal Year (FY) 2024 and FY 2025 funds, along with the FY 2024 CoC Priority Listing.

On July 3, 2025, HUD sent communication via the Office of Special Needs Assistance Programs (SNAPS) Competitions mailing list announcing the intention to publish a NOFO for 2025 CoC awards. On August 4, 2025, the SNAPS Office sent out communication to only CoC Collaborative Applicants noting that the 2025 CoC Program NOFO “is on the horizon”.

On September 5, 2025, HUD released a CoC Builds NOFO, a first-of-its-kind funding for new construction, acquisition, or rehabilitation of Permanent Supportive Housing (PSH), for the second time with an unprecedented one-week deadline. The submission deadline for the CoC Builds NOFO was Friday, September 12, 2025, by 12:00 p.m. PDT.

On September 29, 2025, POLITICO released an expose that was corroborated by multiple sources within HUD with notable changes. On September 30, 2025, the National Alliance to End Homelessness (NAEH) released a Press Release condemning the new funding criteria that HUD intends to publish in the forthcoming FY 2025 CoC Program Competition NOFO. NAEH noted concerns around three major issues:

- **Permanent Housing Slashed:** The funding application will cap investments in permanent housing resources, so that no community can invest more than 30% of its CoC program funds in proven

solutions such as PSH or Rapid Rehousing. The impact of this sudden shift will be massive, causing more than 170,000 of the most vulnerable Americans currently served in these programs to lose their housing and supportive services. This includes people with physical and behavioral disabilities, veterans, older adults, youth, families, and those in rural communities. It is also expected to force providers to suspend or contract services and lay off staff.

- **Outdated Programs Prioritized:** The NOFO will instead incentivize communities to invest in transitional housing and treatment-first approaches. These strategies were deprioritized by the federal government decades ago because they were proven to be more costly and less effective at ending people's homelessness.
- **Ongoing Funding Destabilized:** The 30% cap on permanent housing will force communities to defund or significantly reduce funding for existing programs, regardless of their outcomes.

NAEH also expressed frustration at the timing of the FY 2025 CoC Program NOFO and emphasized that the compressed schedule and dramatic changes would likely result in some programs running out of funds before FY 2025 applications can be reviewed. On October 1, 2025, the U.S. federal government shutdown and CoCs were told that if a FY 2025 CoC Program NOFO was released, it would be released shortly after the government reopened.

On November 13, 2025, HUD released a FY 2025 CoC Program NOFO, which rescinds and supersedes any mention of FY 2025 CoC funds within the 2024 CoC Program NOFO. HUD announced the NOFO via email through the SNAPs Competitions mailing list after business hours the same day it was released. Approximately \$3,918,000,000 in competitive funding is available, including at least \$52,000,000 available for Domestic Violence, Dating Violence, Sexual Assault, and Stalking Bonus (DV Bonus) projects. Key changes to highlight within the FY 2025 CoC Program NOFO include:

- Permanent Housing funding cap, allowing a maximum of 30% of a CoC's Annual Renewal Demand (ARD) to funding permanent housing projects
- New eligible project types, including Transitional Housing and Supportive Services Only (Street Outreach)
- Tier 1 is equal to 30% of a CoC's ARD
- Significant changes to scoring criteria, including participation requirements for supportive services, substance use treatment service offerings and requirements, and expanded partnership with law enforcement

The Office of Care Coordination provided email communication to the CoC Board membership and via the CoC email listserv. An in-depth analysis of the FY 2025 CoC Program NOFO completed by NAEH can be referenced in **Attachment A**. Additionally, comparisons of the FY 2024 and FY 2025 CoC Program NOFO, highlighting significant changes to the overall competition and scoring criteria can be found in **Attachment B** and **Attachment C**.

The submission deadline for the FY 2025 CoC Program NOFO is **January 14, 2026, at 5:00 p.m. PT**. The Office of Care Coordination as the Collaborative Applicant is also requesting authority to act in the best interest of the Orange County CoC, given the expedited submission process, should the application timeline of the CoC Program NOFO prevent components of the local competition from coming before the CoC Board for approval. Approval of the authority would provide flexibility to the Office of Care Coordination and not delay decisions or actions as it relates to the CoC Program NOFO.

CES Prioritization Policy

To prepare for the anticipated changes within the FY 2025 CoC Program NOFO, the Office of Care Coordination as the Collaborative Applicant for the Orange County CoC and as the CES Lead, began reviewing local policies for contingency planning. Prior to the CES Prioritization Policy changes, the Office of Care Coordination reached out to local CoCs to inquire how other CoCs were considering updating their community's CES policies and procedures to account for households currently housed through CoC funded permanent housing programs who may return to homelessness due to expected changes in the CoC Program NOFO. Although local CoCs did not respond directly to the Office of Care Coordination, in cohort meetings and other meetings, CoCs shared that there are considerations for revising their CES Prioritization Policy to include a preference for people in a CoC funded PSH programs.

The Office of Care Coordination convened meetings with the Executive Directors of CoC-Funded Agencies multiple times to discuss how federal policy and action is impacting the CoC Program. A shared goal emerged through the meetings that focused on using the CoC Program funding and resources to keep people housed and prevent households from returning to homelessness. In the meetings, there was also discussion on revisions to the CES Policies and Procedures to prioritize keeping people housed.

In preparation for the expected permanent housing funding cap, the Office of Care Coordination as the CES Lead revised the CES Policies and Procedures to update the Prioritization Policy to include households enrolled in PSH programs that are at-risk of experiencing homelessness as a result of decreased CoC Program funding to be considered for other housing opportunities, with the goal of maintaining housing stability.

The proposed CES Prioritization Policy changes were previewed at the CES Steering Committee meeting on November 5, 2025. A public comment was received highlighting the consideration of prioritizing preferences for families with children. CES Steering Committee members did not have feedback but had procedural questions on the implementation of a new priority in CES for households at-risk of homelessness due to a CoC funded PSH program ending. The proposed CES Prioritization Policy changes were also presented at the Policies, Procedures and Standards (PPS) Committee on November 10, 2025. The PPS Committee members noted some of the following concerns and comments:

- Concerns over rapid rehousing projects not being included in the proposed CES Prioritization Policy
- Concerns on the impacts to households in rapid rehousing
- Emphasized the need for alternative resources for households at-risk and finding different routes to maintain housing
- Concerns for emergency housing vouchers
- Emphasized the need for review of eligibility criteria for projects that households may be shifted to, as the households may no longer be eligible for the same project types they were prior to being housed

The Executive Directors of CoC-Funded Agencies were provided with the draft CES Prioritization Policy changes. Some CoC-Funded Agencies had the following questions:

- For the people who transfer from PSH programs, how does this work with PSH requirements for chronic homelessness status?
- Would a participant's former chronic homelessness verification be sufficient for transfer to a different PSH program?

The compiled feedback received can be referenced in **Attachment D**. As a response to the feedback heard during the PPS Committee, the Office of Care Coordination revised the draft Prioritization Policy to also include rapid rehousing households at-risk of homelessness due to CoC Program changes as a prioritization group. The proposed CES Policies and Procedures Prioritization Policy changes can be referenced in **Attachment E**. Approval of the CES Policies and Procedures Prioritization Policy changes will ensure that households enrolled in PSH programs that are at-risk of experiencing homelessness are prioritized in CES, given the anticipated loss of funding due to the permanent housing funding cap within the FY 2025 CoC Program NOFO.

Attachments

Attachment A – NAEH FY2025 CoC Program Competition Application Information

Attachment B – NAEH Side-By-Side Comparison of FY24 and FY25 CoC Program NOFOs Overall

Attachment C – NAEH Side-By-Side Comparison of FY24 and FY25 CoC Program NOFO Scoring

Attachment D – CES Prioritization Policy Feedback Received

Attachment E – CES Prioritization Policy



FY2025 CoC Program Competition Application Information

Opportunity Name: [FY 2025 Continuum of Care Competition and Youth Homeless Demonstration Program Grants NOFO](#)

Application Deadline: January 14, 2026, at 8:00pm EST

These insights are strictly those of the Alliance based on our knowledge and expertise. It should not be read as official HUD guidance on the FY2025 CoC Program NOFO.

FUNDING OVERVIEW

\$3.918 billion is available. In addition to the \$3.54 billion available through the full year Continuing Resolution, HUD repurposed \$100 million originally designated for development of new permanent supportive housing (with Congressional approval) and \$294 million of Section 231 funds (recaptured funding).

- This increased amount may be enough to cover the national renewal demand which will now be calculated using the FY2026 Fair Market Rent rates.
- Everything except CoC Planning (or UFA costs) is competitive and must be ranked, including Youth Homelessness Demonstration Program renewals.
- Projects originally awarded under the Special NOFO on Unsheltered and Rural Homelessness that will expire in 2026 are eligible to apply for renewal.
- At least \$52 million must be used for new DV Bonus projects, which now may include transitional housing as an eligible project type.

CoCs will continue to rank projects into two tiers. Projects ranked in Tier 1 are only required to meet the project quality and project threshold requirements. They are not subject to the CoC score. Projects ranked in Tier 2 are competitively awarded based on CoC score, as well as subject to project quality/threshold requirements.

- Tier 1 is set at 30% of overall funding (compared to 90% in 2024)
- Tier 2 is set at 70% of overall funding (compared to 10% in 2024)

No more than 30 percent of a CoC's Annual Renewal Demand (ARD) can be used to fund Permanent Housing projects, including PH-PSH, PH-RRH and Joint TH and PH-RRH projects, **forcing CoCs to reallocate the majority of their current programming to other project types.**

Joint Component TH-RRH renewal projects continue to be eligible for renewal funding but are not allowable as a new project type.

TOP 10 NOFO CHANGES

1. **Only 30 percent of a CoC's funding is protected in Tier 1, down from 90 percent in past years.** This is the most significant structural change in a decade. With 70 percent of funding now fully competitive and tied to Merit Review scores and project ranking, even small scoring differences could lead to major funding losses.
2. **Permanent Housing (PSH, RRH, Joint TH-RRH) is capped at 30 percent of ARD.** CoCs must shift funding from existing permanent housing projects that exceed this cap toward new projects that are aligned with the administration's priorities, particularly transitional housing with high service requirements. New Joint TH-RRH projects are no longer eligible.
3. **All projects except for CoC Planning/UFA must compete, including YHDP renewals and DV Bonus.** These projects must be ranked and scored in Tier 2 with no special protections, increasing competition across the entire portfolio.
4. **New prohibitions can disqualify any project.** HUD may reject projects in Tier 1 or 2 for engaging in racial preferences, using a definition of sex "other than binary," or conducting activities viewed as "harm reduction." These provisions create significant new compliance risks.
5. **HUD's new national priority centers on treatment, recovery, and required services.** HUD favors projects with onsite substance use treatment, required service participation, sufficient treatment bed capacity, and 24/7 detox or inpatient access. Required services now boost scoring.
6. **HUD elevates "public safety" as a major scoring factor.** CoCs must show laws prohibiting camping and illicit drug use, enforcement protocols, cooperation with law enforcement, use of involuntary commitment standards, and SORNA implementation. These factors elevate the influence of local criminalization policies.
7. **New project requirements reshape TH, RRH, PSH, and Street Outreach.** New transitional housing must provide 40 hours/week of services; new RRH must show strong employment outcomes and require services; new PSH must serve elderly or physically disabled individuals (not including substance use disorder) with required services; and new street outreach must demonstrate strong law-enforcement partnerships.
8. **Merit Review replaces prior CoC scoring and shifts weighting.** The 130-point system includes 9 points for Project Capacity/Ranking, 40 for System Performance, and 81 for Coordination & Engagement, plus 19 bonus points. Service requirements feature prominently throughout.
9. **Tier 2 scoring now favors projects with required services.** Tier 2 projects receive up to 100 points based on Merit Review scores, local ranking, and up to 10 points for requiring services—giving mandatory-service models a clear advantage.
10. **HUD's expanded Risk Review increases the likelihood of project rejection.** HUD may consider media reports, Inspector General and Government Accountability Office findings, public complaints, or an organization's "history of subsidizing activities that conflict with the NOFO" as grounds for denying funding.

NEW FY2025 POLICY PRIORITIES

- **Ending the crisis of homelessness on our streets.** Citing a California Policy Lab study from 2019, HUD claims that 75% of people experiencing unsheltered homelessness report a substance use disorder (SUD) and 78% report a mental health condition. Therefore, CoCs should direct resources towards outreach, intervention, and assistance consistent with Executive Order on "Ending Crime and Disorder on America's Streets."
- **Prioritizing Treatment and Recovery.** CoCs should prioritize projects that provide treatment and services needed to recover and regain self-sufficiency, including on-site treatment and participation

Item 4. Attachment A

requirements in services.

- **Advancing Public Safety.** CoCs should cooperate with law enforcement to advance public safety. HUD cited the Supreme Court decision in *Grants Pass v. Johnson* as upholding the authority of local governments to prohibit public camping.
- **Promoting Self-Sufficiency.** Highlighting that one of the primary purposes of the CoC program is to optimize self-sufficiency, HUD indicates that CoCs should prioritize projects that help lead to long-term economic independence for individuals and families. This would allow them to exit homelessness and prevent future returns to homelessness.
- **Improving outcomes.** CoCs should review all eligible projects to determine their effectiveness in reducing homelessness and prioritize those that promote self-sufficiency, increase employment income over government assistance, and promote treatment and recovery.
- **Minimizing trauma.** CoCs should encourage the use of trauma informed care, ensure safety of program participants, and access to 'safe, single-sex spaces' for women.

NEW/UPDATED PROJECT APPLICANT CERTIFICATIONS AND EXPECTATIONS

- Updated **HUD Applicant and Recipient Assurances and Certifications (HUD-424B)** that includes a certification that the applicant will not use federal funding to promote diversity, equity, and inclusion mandates, policies, programs, or activities that violate any applicable federal anti-discrimination laws.
- New **Certification of Need and Compliance with Housing Quality and Habitability Standards** in which the Collaborative Applicant must certify a demonstrated need for all PH projects included in the Renewal Project Listing and that they all comply with program requirements, including HQS or Habitability Standards (whichever is applicable).
- New **Certification for Opportunity Zone Preference Points** if the CoC is requesting up to 4 Opportunity Zone preference points.

RURAL COSTS FOR PROJECTS ORIGINALLY AWARDED UNDER THE RURAL SET ASIDE OF THE SPECIAL COC NOFO

Projects originally awarded under the Rural Set Aside through the Special CoC NOFO are permitted to continue to use funding for purposes allowable through that set aside, including: rent and utility arrears, repairs to make housing habitable, capacity building activities, emergency food and clothing assistance, and costs associated with making use of Federal Inventory property programs.

The costs permitted for rural areas generally (per Section 5707 of the James M. Inhofe National Defense Authorization Act for Fiscal Year 2023 (PL 117-263, December 23, 2022, 136 Stat 2395) amended section 423(a) of the McKinney-Vento Homeless Assistance Act) are not applicable for these projects.

NEW PROJECTS CREATED WITH COC BONUS OR THROUGH COC REALLOCATION

CoCs may apply for any of the following project types through the CoC Bonus or CoC Reallocation Process:

Item 4. Attachment A

- Supportive Services Only (SSO)
- Transitional Housing (TH)
- Permanent Supportive Housing (PSH)
- Rapid Rehousing (RRH)
- Dedicated HMIS
- SSO-Coordinated Entry

Transition grants, which allow an eligible CoC renewal project to transition from one program component to another eligible component over a 1-year period, are permitted this year. If awarded a transition grant, the operating start date of the new grant would be the day after the end of the expiring grant term, similar to a renewal grant. **It is important to note:** The applicant for the transition grant must be the same as the recipient on the current grant agreement for the project being eliminated. If a new applicant were needed for the project, it would simply be a new project and would not qualify as a transition grant.

PROJECT REVIEW

Standard project quality and project threshold criteria apply for new and renewal projects with some key additions:

- Project applicants will be required to affirm that they will (1) not engage in racial preferences or other forms of illegal discrimination and (2) not engage in any activities under the pretext of 'harm reduction'. HUD may also reduce or reject applications in which project applicants have previously or currently engaged in these activities.
- Renewal projects could also be reduced or rejected if there is evidence that the project has previously or currently conducted activities that rely on or otherwise use "a definition of sex other than as binary in humans."
- New projects will be rated using project quality criteria that will assess factors such as the reasonableness of costs and the leveraging of mainstream programs like Medicaid and SSI as well as the following:
 - New transitional housing projects will be required to provide 40 hours of customized services per program participant (except for participants over 62 or with a physical disability/impairment).
 - New Supportive Services Only (SSO) projects for street outreach will be required to demonstrate that the project applicant has a history of partnering with first responders and law enforcement and will cooperate with the enforcement of local laws such as public camping and public drug use.
 - New Permanent Supportive Housing projects must be designed to serve elderly individuals and/or individuals with a physical disability/impairment (not including substance use disorder) and require participation in supportive services.
 - New Rapid Rehousing projects must demonstrate that the project applicant has previously operated a project with higher-than-average outcomes on increasing employment income and will require participation in supportive services.

MERIT REVIEW

Merit Review (previously CoC Scoring Criteria) removes or significantly adjusts previous criteria and adds new criteria, with a total of 130 points available across 3 rating areas: Project Capacity, Review, and Ranking; System Performance; and CoC Coordination and Engagement. In addition, there are 19 bonus points

Item 4. Attachment A

available (15 for CoC Mergers and up to 4 for Policy Initiative Preference Points).

New/Updated Criteria:

- Supportive service participation requirements are considered a part of their local ranking and review process.
- The availability of treatment and recovery services, specifically looking at the extent to which the following is true:
 - On-site substance use treatment is available and participation is required
 - A minimum number of beds based on overall population size available for this purpose
 - There is 24/7 access to detox or inpatient treatment within the CoC geography
 - There are formal partnerships with entities like Certified Community Behavioral Health Clinics
 - Recovery housing is available in the CoC
 - Amount of funding available for supportive services either through leveraging other resources or by using 30% or more of CoC funds for services
- Service participation requirements demonstrated by supportive service agreements across CoC projects (for full points, 100% of projects must have service participation requirements).
- There is a plan in place for sharing PIT, HIC, HMIS, and SPM data with state and local government as permitted by law.
- Street outreach projects partner with first responders and law enforcement to increase housing and service engagement.
- To demonstrate how public safety plays a role in efforts to end homelessness:
 - Cite state or local law(s) that cover the CoC's entire geographic area that prohibit illicit drug use and prohibits public camping or loitering
 - Affirm that there is a protocol in place for enforcement of such laws across entire geographic area of CoC
 - Demonstrated utilization of standards including involuntary commitment for people 'who are a danger to themselves or others'
 - The state substantially implements and is compliant with SORNA
 - The CoC cooperates and assists law enforcement in mapping and checking location of homeless sex offenders and assists or does not interfere with law enforcement response to addressing violators of public camping or drug use laws
- Preference points are available for CoCs that incorporate an Opportunity Zone or that can demonstrate that all non-profit project applicants will voluntarily verify immigration status using SAVE (directly or in coordination with state or local government).

RISK REVIEW

HUD's review of applications has always included an assessment of risk and past performance. In FY2025, this "Risk Review" incorporates the same criteria as in years past (i.e., financial controls, effective management systems, results of audits) but adds two new criteria

- Other public sources such as newspapers, Inspector General or Government Accountability Office reports or findings, or other complaints that have been proven to have merit

Item 4. Attachment A

- History of subsidizing or facilitating activities that conflict with the purposes of this NOFO

SELECTION PROCESS

HUD makes a point of stating that it may, to the extent allowed by law:

- Fund applications in whole or in part.
- Fund applications at a lower amount than requested.
- Choose to fund no applications under this NOFO.
- Adjust funding for an application, to ensure funding or geographic dispersion, and
- alignment with program or administrative priorities.
- Withdraw an award offer and make an offer of funding to another eligible application, if terms and conditions are not finalized or met.
- Use additional funds made available after NOFO publication to either fully fund an application or fund additional applications.
- Correct HUD review and selection errors. If HUD commits an error that causes an applicant not to be selected, HUD may make an award to that applicant when and if funding is available.
- Release another NOFO, if funding is available and if HUD does not receive applications of merit.

Different from the FY2024/FY2025 NOFO, only CoC Planning (or UFA Cost applications, if applicable) will be conditionally awarded non-competitively. All other project types must be ranked by the CoC. HUD will then select as follows:

- All Tier 1 projects that pass project quality and project eligibility thresholds.
- Then HUD will select projects that meet project quality and project eligibility thresholds in Tier 2 in the order of project score. Each new and renewal project ranked in Tier 2 (including YHDP renewal and DV Bonus) will receive a point value up to 100 points:
 - Up to 50 points in direct proportion to the Merit Review Score
 - Up to 40 points for the CoC's ranking of the project (the higher the ranking in Tier 2, the more points assigned)
 - Up to 10 points for projects that have or will incorporate service participation requirements evidenced in an occupancy agreement (or equivalent document)
- Any permanent housing projects that exceed the 30% ARD cap for the CoC will be removed from the project listing and Tier 2 project scores will be adjusted accordingly.
- If the \$52 million minimum for DV Bonus has not been reached after making Tier 2 project selections, HUD will continue down the list to fund additional DV Bonus projects by project-level score until at least \$52 million has been selected.

Regarding active litigation: If any part or provision of the grant Agreement or terms of this Notice have been or are enjoined or held to be void or unenforceable by a federal court, they shall be ineffective only to the extent of such court's authority and only as to such prohibition or injunction and shall not invalidate or affect the legality or enforceability of the remaining provisions and applications of the Agreement and Notice. In the event the injunction of such provisions is stayed, dissolved or reversed, the full terms of the grant agreement and Notice, including such provisions, will automatically become effective.

POST AWARD INFORMATION

Awarded projects will be required to comply with the following new provisions:

- Compliance with Immigration Requirements (8 U.S.C. 1601-1646; Executive Order 14218)
- Equal Participation of Faith-based Organizations in HUD Programs and Activities consistent with 42 U.S.C. 2000bb et seq.; 42 U.S.C. 2000d et seq.; 24 CFR 5.109; and Executive Orders 14202, Eradicating Anti-Christian Bias and EO 14205, Establishment of the White House Faith Office.
- Environmental requirements that apply in accordance with 24 CFR part 50 or part 58
- Unless prohibited by law and to the extent permitted under the Freedom of Information Act (FOIA), your application and post-award content may be released to the public in response to FOIA requests, except to the extent that certain information may be withheld under a FOIA exemption (5 USC § 552(b); 24 CFR 15.107(b)). HUD may also share your information within HUD or with other Federal agencies if HUD determines that sharing is relevant to the respective program's objectives.
- Waste, Fraud, Abuse, and Whistleblower Protections. 41 USC § 4712, which includes informing your employees in writing of their rights and remedies, in the predominant native language of the workforce. Under 41 U.S.C. § 4712, employees of a contractor, subcontractor, grantee, subgrantee, and personal services contractor may not be discharged, demoted, or otherwise discriminated against as a reprisal for disclosing information that the employee reasonably believes is evidence of gross mismanagement of a Federal contract or grant, a gross waste of Federal funds, an abuse of authority relating to a Federal contract or grant, a substantial and specific danger to public health or safety, or a violation of law, rule, or regulation related to a Federal contract (including the competition for or negotiation of a contract) or grant. (See Federal Contractor or Grantee Protections | Office of Inspector General, Department of Housing and Urban Development ([hudoig.gov](https://www.hudoint.gov)))
- Presidential Executive Actions affecting federal financial assistance programs, as advised by the Department, unless otherwise restricted by law: Executive Order (EO) 14219 (Ensuring Lawful Governance and Implementing the President's "Department of Government Efficiency" Deregulatory Initiative); 14218 (Ending Taxpayer Subsidization of Open Borders); guidance resulting from the White House Task Force established by 14202 (Eradicating Anti-Christian Bias) and the Senior Advisor to the White House Faith Office assigned by 14205 (Establishment of the White House Faith Office); 14182 (Enforcing the Hyde Amendment); 14173 (Ending Illegal Discrimination and Restoring Merit-Based Opportunity); 14168 (Defending Women From Gender Ideology Extremism and Restoring Biological Truth to the Federal Government); 14151 (Ending Radical and Wasteful Government DEI Programs and Preferencing); and 14148 (Initial Rescissions of Harmful Executive Orders and Actions)

In addition, awards made under this NOFO:

- Will not be used to conduct activities that subsidize or facilitate racial preferences or other forms of illegal discrimination, including activities where race or intentional proxies for race will be used as a selection criterion for employment or program participation; or conduct activities that rely on or otherwise use a definition of sex as other than binary in humans.
- Will not be used to fund, promote, encourage, subsidize or facilitate the use of illicit drugs.
- Will not be used to fund any project, service provider, or organization that operates drug injection sites or "safe consumption sites," knowingly distributes drug paraphernalia on or off of property under their control, permits the use or distribution of illicit drugs on property under their control, or conducts any of these activities under the pretext of "harm reduction."

HUD has removed the following items which were included in the FY2024/FY2025 NOFO from the list of requirements:

- Compliance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d-2000d-4) (Nondiscrimination in Federally Assisted Programs) and implementing regulations at 24 CFR part
- Compliance with the Age Discrimination Act of 1975 (42 U.S.C. 6101-6107) and implementing regulations at 24 CFR part 146

Item 4. Attachment A

- Compliance with Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794) and implementing regulations at 24 CFR part 8
- Compliance with the Americans with Disabilities Act, 42 U.S.C. 12101 et seq
- Compliance with Improving Access to Services for Persons with Limited English Proficiency (LEP) requirements, including those listed within Federal Register Notice, FR-4878-N-02 (also see HUD's webpage)
- Compliance with Equal Access Requirements (e.g., 24 CFR 5.105(a)(2) and 5.106)
- Compliance with Energy Efficient and Sustainable by Design
- Compliance with Eminent Domain
- Compliance with System for Award Management and Universal Identifier Requirements at 2 CFR part 25
- Compliance with section 106(g) of the Trafficking Victims Protection Act of 2000 (TVPA), as amended (22 U.S.C. 7104(g)) and implementing regulations at 2 CFR part 175 (Award Term for Trafficking in Persons)
- Compliance with Award Term and Condition for Recipient Integrity and Performance Matters (see Appendix XII to 2 CFR part 200)
- Compliance with Suspension and Debarment regulations (2 CFR part 2424 and 2 CFR part 180)
- Compliance with environmental justice requirements that apply in accordance with Executive Orders 12898 and 14008, and OMB Memorandum M-21-28, which implements the Justice40 Initiative, section 223 of Executive Order 14008
- Compliance with HUD Secretary Fudge's April 12, 2022 memorandum "Eliminating Barriers That May Unnecessarily Prevent Individuals with Criminal Histories from Participation in HUD Programs"



Overall Side By Side Comparison of FY24 and FY 25 CoC Program Competition NOFOs

FY 2024 and FY 2025 Continuum of Care Competition and Renewal or Replacement of Youth Homeless Demonstration Program Grants	FY 2025 Continuum of Care Competition and youth Homelessness Demonstration Program Grants
Youth Homelessness Demonstration Program (YHDP) projects renewing under the CoC Program awarded noncompetitively	Youth Homelessness Demonstration Program (YHDP) projects renewing under the CoC Program awarded competitively
Transitional housing and projects that deliver supportive services only permitted as renewal grants only	Permitted and encouraged to apply for Transitional housing and projects that deliver supportive services only as new projects (reallocated from existing renewal project funding)
In accordance with the statute, incentives are provided for permanent housing projects only	In order to invest in more transitional housing and supportive services only projects, HUD is limiting the amount of permanent housing (PH and RRH) to 30 percent of eligible award amount
<p>CoCs rank projects into two tiers and HUD selects projects based on how they rank individual projects and whether they are in tier 1 or 2. Depending on CoC score, a CoC could lose some or all of projects ranked in Tier 2.</p> <p>Tier 1 = 90% of funds “held harmless” and not dependent on CoC overall score.</p> <p>Tier 2 = 10% of funds dependent on CoC overall score. Ensures vast majority of renewal funding is protected to avoid disruption even if CoC does not receive a high score. Depending on score, a CoC could lose</p>	<p>CoCs rank projects into two tiers and HUD selects projects based on how they rank individual projects and whether they are in tier 1 or 2. Depending on CoC score, a CoC could lose some or all of projects ranked in Tier 2.</p> <p>Tier 1 = 30% of funds “held harmless” and not dependent on CoC overall score.</p> <p>Tier 2 = 70% of funds dependent on CoC overall score.</p>

FY 2024 and FY 2025 Continuum of Care Competition and Renewal or Replacement of Youth Homeless Demonstration Program Grants	FY 2025 Continuum of Care Competition and youth Homelessness Demonstration Program Grants
<p>Project eligibility threshold -pass/fail standard that assesses the extent in which a project is eligible, meets financial and management capacity, submits all required standard certifications, will serve only eligible populations, and will agree to participate in HMIS (unless DV)</p>	<p>Project eligibility threshold -pass/fail standard that assesses the extent in which a project is eligible, meets financial and management capacity, submits all required standard certifications, will serve only eligible populations, and will agree to participate in HMIS (unless DV) and certifies affirmatively that the project applicant will not engage in racial preferences or other forms of illegal discrimination and will not engage in any activities under the pretext of “harm reduction.”</p>
<p>Project quality threshold- HUD reviews all new projects to assess the extent in which it meets additional capacity standards and must receive a minimum number of points for rating criteria for relevant project type.</p>	<p>Project quality threshold- HUD reviews all new projects to assess the extent in which it meets additional capacity standards and must receive a minimum number of points for rating criteria for relevant project type. In addition, HUD has added new language that allows HUD to verify past performance and reject a project if there is evidence that it has previously or currently engaged or engages in racial preferences or other forms of illegal discrimination, engaged or engages in in activities that “violate the sex binary in humans,” and, engaged or engages in any activities under the pretext of “harm reduction. How this will be assessed is unclear.</p>
<p>Project Rating Criteria for eligible new project types consistent with years prior- focus on assisting participants obtain and remain in housing, connecting with mainstream benefits, supportive service participation is voluntary.</p>	<p>Project rating criteria across project types include key differences. Examples Include: New TH and PH (PSH and RRH) will be scored on the extent in which service participation is required (with onsite services preferred). For TH projects, applicants will be scored on the extent to which they will provide 40 hours of customized services for each program participant. New grants for street outreach are scored on the extent in they cooperate with law enforcement to enforce local laws such as public camping and public drug use laws.</p>

FY 2024 and FY 2025 Continuum of Care Competition and Renewal or Replacement of Youth Homeless Demonstration Program Grants	FY 2025 Continuum of Care Competition and youth Homelessness Demonstration Program Grants
<p>Project renewal threshold requires renewal project applications to meet the minimum project eligibility, capacity, timeliness, and performance standards identified in this NOFO or be rejected from consideration.</p>	<p>Project renewal threshold requires renewal project applications to meet the minimum project eligibility, capacity, timeliness, and performance standards identified in this NOFO or be rejected from consideration. Added two additional reasons for HUD to reject a renewal project from the competition: evidence that the project has previously or currently engages or engaged in racial preferences or other forms of illegal discrimination, engages or engaged in activities that violate the “sex binary in humans”, or engages or engaged in activities under the pretext of “harm reduction.”</p>
<p>CoC Application Scoring awards points to CoCs across 7 rating areas with no significant differences from year prior. Focus on systemwide performance, the use of inclusive processes, racial equity and addressing disparities, the promotion of client choice and voluntary services, and strategies that prevent the criminalization of homelessness.</p>	<p>Now referred to as a Merit Review which is comprised of 3 rating areas with many significant differences. In addition to removing many of the previous criteria upon which CoCs were scored, several new criteria were added that will disadvantage the majority—if not all—CoCs and current recipients of funding because of how far they swing from past expectations. These include rating factors tied to the extent in which existing projects require service participation and the existence of state or local laws that cover the CoCs entire geographic area that prohibit illicit drug use and camping. Historically, HUD has given CoCs at least one year of notice of shifting priorities that allow time to adopt and implement. Given that scoring will now determine 70% of award decisions, this could result in many CoCs losing a large proportion of their existing funding.</p>
<p>NOFO did not include any preference points associated with administration initiatives.</p>	<p>Includes initiative preference points:</p> <ol style="list-style-type: none"> 1. If more than 50% of proposed activities happen within an Opportunity Zone 2. If all non-profit applicants/recipients of funding voluntarily, thoroughly, and demonstrably facilitate verification of immigration status using SAVE directly or in coordination with state/local government

FY 2024 and FY 2025 Continuum of Care Competition and Renewal or Replacement of Youth Homeless Demonstration Program Grants	FY 2025 Continuum of Care Competition and youth Homelessness Demonstration Program Grants
<p>HUD may use a risk-based approach in reviewing projects and may consider factors tied to administrative requirements and performance requirements. Examples of factors considered for past performance include accounting for use of funds, timely submission of reports, meeting performance targets in grant agreement, producing positive outcomes and results. HUD may reduce overall score based on past performance and could take additional remedies if there is an adverse finding.</p>	<p>Now referred to as a “risk review” with two distinct changes of significance. There is a new criterion: “History of subsidizing or facilitating activities that conflict with the purposes of this NOFO.” Further, rather than incorporating this as part of the scoring component, it is now a separate component in the selection process. This would essentially allow HUD to target any organization that it deems to be not aligned with the administration— regardless of outcomes or performance at responding to homelessness— and place any projects, new and renewal, that they request at risk of not being funded.</p>
<p>In selecting projects for funding, there are certain project types that would be selected noncompetitively before looking at ranked projects in tiers. These include CoC Planning (or UFA Costs projects, if applicable), YHDP renewal/replacement projects, and DV Bonus projects.</p>	<p>In selecting projects for funding, only CoC Planning (or UFA Costs projects, if applicable), will be selected before looking at ranked projects in tiers. This means all other project types—including YHDP and DV Bonus projects--will be competitively awarded.</p>
<p>Projects ranked in Tier 1 are awarded first based on passing project eligibility, quality, and threshold review. CoC score is only a factor if amount of funding available under the NOFO is reduced. Equals 90% of all CoC funding.</p>	<p>Projects ranked in Tier 1 are awarded first based on passing project eligibility, quality, and threshold review. CoC score is only a factor if amount of funding available under the NOFO is reduced. Equals 30% of all CoC funding.</p>
<p>Projects ranked in Tier 2 are awarded based on a project score that takes into account the CoC score, the project ranking, and commitment to housing first.</p>	<p>Projects ranked in Tier 2 are awarded based on a project score that takes into account the CoC score, the project ranking, and commitment to service participation requirements.</p>

FY 2024 and FY 2025 Continuum of Care Competition and Renewal or Replacement of Youth Homeless Demonstration Program Grants	FY 2025 Continuum of Care Competition and youth Homelessness Demonstration Program Grants
<p>NOFO outlines all administrative, national, and departmental policy requirements and terms that all projects must comply with. These include requirements associated with a broad range of statutes and regulations including fair housing, the ADA, and Section 504, some departmental-specific policy, and specific Executive Orders such as those focused on racial equity and equity for LGBTQ+ populations. This is important to note because projects and CoCs will be penalized in FY2025 for participation in certain activities which they were required to comply with.</p>	<p>NOFO outlines all administrative, national, and departmental policy requirements and terms that all projects must comply with. These include requirements associated with a broad range of statutes and regulations including fair housing, the ADA, and Section 504, some departmental-specific policy, and specific Executive Orders. Removes requirements associated with past HUD policy and prior Executive Orders. The NOFO also adds new conditions which prohibit awardees from engaging in activities that: facilitate racial preferences or other forms of illegal discrimination—including the use of ‘proxies for race’-or activities that violate the “sex binary in humans”; fund promote or encourage the use of illicit drugs or are done under the pretext of harm reduction.</p>
<p>Solo Applicants are applicants that apply as an organization outside of the CoC process <i>after</i> they have attempted to participate but were not permitted to do so.</p>	<p>Solo Applicants are applicants that apply as an organization outside of the CoC process <i>after</i> they have attempted to participate but were not permitted to do so. There may be different deadlines for solo applicants.</p>



Side-By-Side Comparison of CoC Scoring FY2024/25 vs. FY2025

Below is a high-level summary of the CoC Application Scoring criteria that was included in the FY2024 and FY2025 CoC Program NOFO in comparison to the Merit Review criteria included in the FY2025 CoC Program NOFO. Items that are new or updated in FY2025 vs. FY2024 are marked **NEW** or **UPDATED**. Please review the FY2025 CoC Program NOFO for full details.

CoC Application Scoring Summary FY2024	Merit Review Summary FY2025
<ol style="list-style-type: none"> 1. CoC Coordination and Engagement = 84 points 2. Project Capacity, Review, and Ranking = 28 pts. 3. HMIS = 9 points 4. PIT Count = 5 points 5. System Performance = 60 points 6. Coordination w/ Hsng & Healthcare = 14 points <p>Bonus Points: CoC Merger Bonus = 25 points</p>	<ol style="list-style-type: none"> A. Project Capacity, Review, and Ranking = 9 points B. System Performance = 40 points C. CoC Coordination and Engagement = 81 points <p>Bonus Points CoC Merger Bonus = 15 points Policy Initiative Preference = 4 points</p>

Item 4. Attachment C

CoC Coordination & Engagement	84	C. CoC Coordination & Engagement	81
Has an inclusive membership of a variety of stakeholders within the geographic area	2	UPDATED: Has an inclusive membership of a variety of stakeholders within the geographic area and considers the needs of all relevant subpopulations	0.5
		NEW: Has a governance board representative of community (at least 1 PWLE; 3 electeds; 1 business community; 2 LEO)	4
Has an invitation process for new members to join	1	Has an invitation process for new members to join	0.5
Solicits and considers opinions from knowledgeable individuals and organizations	1	Solicits and considers opinions from knowledgeable individuals and organizations	0.5
Accepts and considers proposals from organizations that have not previously received CoC Program funding	1	Accepts and considers proposals from organizations that have not previously received CoC Program funding	0.5
		NEW: Availability of Treatment and Recovery Services (substance use treatment available onsite for at least 30% of projects; there are projects that provide substance use tx which make it a condition of occupancy; minimum # of beds for geographic area based on population size; access to 24/7 detox; formal partnership with CCBHC, etc; sober housing; high % of funding for services or lots of leveraging)	16
		NEW: Participation requirements for services (max points for 100% of projects require services; ½ points if 50% of projects require services)	10
		NEW: Reduce encampments (demonstrated reduction of encampments or people in encampments by 20%)	10

Item 4. Attachment C

Coordinates with federal, state, local, private, and other organizations	2	UPDATED: Coordination with federal, state, local, private, and other organizations (must demonstrate coordination in the planning and operation of projects, describe plan to consult with ESG recipients, and describe how they have or will share PIT, HIC, HMIS, and SPM data with state and local government as permitted by law)	2
Ensures families are not separated	2	<i>Not included</i>	--
CoC collaboration related to children and youth	3	Collaboration related to children and youth	2
		NEW: Coordination with Veteran organizations	6
Addresses the needs of victims of domestic violence, dating violence, sexual assault, and stalking	5	Addressing the needs of victims of domestic violence, dating violence, sexual assault, and stalking	2
Addresses the needs of LGBTQ+ individuals	6	<i>Not included</i>	--
Coordinates with the Public Housing Agencies	10	Partnering with the Public Housing Agencies	2
Coordinates with and assists in state or local discharge planning efforts	2	Discharge planning	2
Uses a Housing First approach on CoC projects	10	<i>Not included</i>	--
Has implemented street outreach procedures	3	UPDATED: Street outreach (positive exits and partnering with law enforcement)	6
Implements specific strategies to prevent the criminalization of homelessness	2	UPDATED/NEW: Promoting public safety (2 pts.- CoCs must cite state/local law that covers entire geographic area that prohibits drug use and camping; 2 pts.- -has a protocol for enforcement for entire geographic area; 3 pts.- demonstrates utilization of involuntary commitment; 3 pts.- use of SORNA; 3-assists in mapping sex offenders and assists law enforcement or co-responders to connect violators of public camping or drug use with services)	13

Item 4. Attachment C

Demonstrates an increase in the number of Rapid Re-Housing beds available	9	<i>Not included</i>	--
Provides information and training to CoC Program-funded projects to supplement CoC Program funds with resources from other public and private sources, including programs that assist program participants in applying for and receiving mainstream benefits or gaining employment	2	<i>Not included</i>	--
Has an effective Coordinated Entry System (CES) and Affirmatively Furthering Fair Housing (AFFH)	6	<i>Not included</i>	--
Promotes racial equity in homelessness response	6	<i>Not included</i>	--
Involves individuals with lived experience of homelessness in service delivery and decision making, and provides professional development and employment opportunities	5	<i>Not included</i>	--
Coordinates and partners with Public Health Agencies	5	<i>Not included</i>	--
Increases affordable housing supply	1	<i>Not included</i>	--
		UPDATED: Leveraging housing and healthcare resource (points for at least one TH, PSH, or RRH that utilizes healthcare resources provided by private orgs, state/local, faith based, or PHAs)	4
Project Capacity, Review, and Ranking	28	Project Capacity, Review, and Ranking	9
Demonstrates the use of objective criteria to review project applications requesting CoC Program funding	4	UPDATED: Objective criteria and system performance (uses objective criteria and at least 25% of points for SPM on returns + SPM on employment income + service participation requirements)	6

Item 4. Attachment C

Demonstrates the use of CoC Program required system performance measures to review project applications requesting CoC Program funding	9	<i>Not included</i>	--
Uses comparable databases to evaluate domestic violence providers	1	<i>Not included</i>	--
Collects and analyzes data on rapid return to permanent housing and severity of barriers experienced by program participants	4	<i>Not included</i>	--
Demonstrates how the CoC is promoting racial equity when reviewing applications	4	<i>Not included</i>	--
Demonstrates that the CoC either reallocates funding from lower performing projects to create new higher performing projects or has a process in place to review performance for future re-allocation	3	UPDATED: Reallocation (CoC demonstrates a standard process for reallocating from lower performing OR have reallocated at least 20% of ARD since FY21)	1
Demonstrate the use of an objective ranking and selection process for project applications that is publicly announced by the CoC	3	Ranking and selection process (invites new proposals from new entities; posting application on website; attaching all projects with ranking info; notify applicants)	2
Homeless Management Information System (HMIS)	9	<i>Not included in Merit Criteria</i>	0
Submits complete Housing Inventory Count (HIC) data in a timely manner	1	<i>Moved into SPM</i>	--
Has in place, is developing, or is coordinating a comparable database with domestic violence / victim service providers to collect required data elements for reporting deidentified information to the CoC	2	<i>Moved into SPM</i>	--
Bed Coverage	2	<i>Moved into SPM</i>	--
Submit prior NOFO year's Longitudinal Systems Analysis (LSA) data in a complete and timely manner	2	<i>Moved into SPM</i>	--

Item 4. Attachment C

Point in Time Count (PIT)	5	Not included in Merit Criteria	0
Conducts a PIT Count and reports the data in Homelessness Data Exchange (HDX)	3	<i>Moved into SPM</i>	--
Implement specific measures to effectively identify and count youth in the CoC's PIT Count	2	<i>Moved into SPM</i>	--
System Performance Measures	60	System Performance Measures	40
Reduces the number of homeless individuals and families (2/12 pts.- for decrease of 5% sheltered '24 from '23 PIT; 7/12 pts.- for decrease of 5% unsheltered '24 from '23 PIT; 3/12 pts.- decrease of 5% sheltered & unsheltered '24 from '23 PIT + Considerations for disaster impacted)	12	UPDATED: Reduces the number of homeless individuals and families (5/17 pts.- decrease of 20% unsheltered '25 from '24; 4/17 pts.- decreases in unsheltered '24 from '23 and '25 from '24; 3/17 pts.- decrease '25 from '23; 3/17 5% decrease in CH '25 from '24; and 2/17 pts.- decrease in total hmlss '25 from '24)	17
Reduces the number of first-time time homelessness among individuals and families (1/3 pts.- for reduction '24 from '23; 2/3 pts.- provide information on how risk factors identified and prevention strategy)	3	UPDATED: Reduces the number of first-time time homelessness among individuals and families (demonstrate reduction of 20% and identify strategies)	1
Reduces the length of time individuals and families remain homeless (8/13 pts.- demonstrate reduction in LOT of 5% '23 from '22 OR average LOT 90 days or less; 5/13 pts.- describe strategies)	13	UPDATED: Reduces the length of time individuals and families remain homeless (demonstrate any reduction in length of time homeless and describe strategies)	1
Demonstrates and describes how the CoC will increase the rate in which individuals and families move to permanent housing destinations or continue to reside in permanent housing projects (6/13 pts.- increased PH by 2% '23 from '22; 3/13 pts.- demonstrate exits from PSH or OPH to pH increased by 1% or retention or exists to PH was 96% or higher; 4/13 pts.- describe strategy)	13	UPDATED: Successful permanent housing placement (2/5 pts.- rate of successful exit from ES, TH, and RRH is at least 50%; 2/5 pts.- 20% of positive program exits are exited to unsubsidized housing; 1/5 pts.- describe strategies)	5

Item 4. Attachment C

Reduces the extent to which individuals and families return to homelessness (3/8 pts.- btwn '22 and '23 reduced returns in 6 mos by 1% OR rate was 5% or less; 3/8 pts.- btwn '22 and '23 reduced returns in 12 mos by 1% or rate was 10% or less; 2/8 pts.- strategies)	8	UPDATED: Reduces the extent to which individuals and families return to homelessness (3/7 pts.- if less than 8% over 24 months; 3/7 pts.- if 7% over 12 months; strategies)	7
Increases income for program participants from employment and non-employment cash sources (2/7 pts.- btwn '22 and '23 increase % employment income OR rate is 20% or higher; 2/7 pts.- btwn '22 and '23 increase % non-employment income OR rate is 50% or higher; 3/7 pts.- for strategies)	7	UPDATED: Increases income for program participants from employment and non-employment cash sources (3/7 pts.- % of participants with increase was 20% or higher for employment; 3/7 pts.- at least 25 % had increase in employment income at exit; 1/7 for strategies on employment and non-employment sources)	7
Submits data quality report for HMIS performance measures in HDX (submitted SPM to HDX by deadline)	4	Timely submission of data (conducted a HIC and PIT count; submitted by deadline; submitted LSA by deadline; submitted SPM by deadline)	1
		HMIS and comparable database participation (at least 85% of beds in geographic area are covered in HMIS – same as last year)	1
Coordination with Housing and Healthcare	14	Not included in Merit Criteria	0
1. Leverages housing resources such as housing subsidies or subsidized housing units not funded through the CoC or Emergency Solutions Grants (ESG) programs	7	<i>Moved into CoC Coordination & Engagement</i>	
Leveraging healthcare resources to help individuals and families experiencing Homelessness	7	<i>Moved into CoC Coordination & Engagement</i>	
Bonus Points: CoC Merger	25	Bonus Points: CoC Merger	15
CoCs merged between current NOFO year and prior NOFO year registrations	5	UPDATED: All CoCs that merged (does not provide date or any other information)	15

Item 4. Attachment C

One or more of the merged CoCs had an application score of 140 or below in the previous CoC Program Competitions	10		
Demonstrates that results in Point-in-Time (PIT) Counts were affected by changes in methodology that resulted from the merger in a way that would affect their CoC score	10		
		NEW: Policy Initiative Preference Points	4
		Up to 4 points if proposed activities are within Opportunity Zone <i>OR</i> Up to 4 points if ALL nonprofit applicants voluntarily verify immigration status using SAVE directly or in coordination with state local gov	4

Coordinated Entry System (CES) Prioritization
Feedback Received from November 2025

CES Steering Committee Feedback Received during the November 5, 2025, Meeting

Topic	Feedback	Response	Additional Details
CES Prioritization	Question on how households enrolled in a CoC funded PSH program would be prioritized.	Households would be prioritized by longest length of homelessness as recorded prior to the CoC program enrollment.	

Policies, Procedures and Standards Committee Feedback Received during the November 10, 2025, Special Meeting

Topic	Feedback	Response	Additional Details
CES Prioritization	Question on if households enrolled into a Rapid Rehousing CoC Program would be added as a prioritized group.	The Office of Care Coordination added a newly established prioritized group to capture households enrolled in a CoC Rapid Rehousing program.	
	General consensus on the need to establish a new CES prioritization to ensure that all households enrolled in any CoC Program remain housed.	The feedback was recorded.	

CoC Funded Agency Executive Directors' Feedback Received after a November 12, 2025, email from the Office of Care Coordination

Topic	Feedback	Response	Additional Details
CES Prioritization	Question on eligibility to transfer people from PSH-to-PSH project as they are no longer considered to be experiencing chronic homelessness.	This question is more procedural and something for the Office of Care Coordination to continue to consider	
	Prioritization contains an approach that seems "first come, first served". This could result in the most vulnerable individuals being overlooked.	The Office of Care Coordination is looking into a previously created assessment as a starting point to ensure the most vulnerable households are prioritized.	
	Length of time in a project or duration of homelessness prior to entry may be less critical at this point than factors such as age, health risks, and other conditions that heighten a person's risk of morbidity if returned to homelessness or shelter.	The previously created assessment, if decided to implement, would be updated, or confirmed, to have questions that capture a household's demographic information giving the CES lead a household's vulnerability to be able to prioritize them as appropriate.	
	Movement of PSH participants between PSH programs to prevent returns to homelessness and to properly accommodate budgets by the participant(s).	HUD does allow movement between PSH units within a project, and between projects if the participant is in good standing in the current PSH unit.	

Coordinated Entry System Prioritization Policy Proposed Revisions to Include New Prioritized Groups

Background:

For people currently enrolled in a Continuum of Care (CoC) Program funded Permanent Supportive Housing (PSH) whose long-term housing stability is at at-risk, through no fault of their own, given federal action that impacts the CoC Program, the Orange County CoC Board has committed to identifying alternative permanent housing opportunities and resources to prevent them from experiencing homelessness again. As such the Coordinated Entry System (CES) Prioritization Policy is being updated to recognize these PSH Program participants and prioritize their continued permanent housing stability by connecting them to available Permanent Housing opportunities. Attachment A provides a list CoC funded PSH Programs.

Based on the feedback of CoC-funded agencies and the Orange County CoC Board, current PSH households funded by the CoC program will be identified as a new prioritized group, within the prioritization schema as detailed in the CES Policies and Procedures. Additionally, households currently enrolled in CoC-funded Rapid Rehousing (RRH) programs will be a second prioritized group, should the household need ongoing assistance beyond the term of the CoC-funded Rapid rehousing program and the agency has no other additional resources to support with.

These households will be prioritized with the established CES prioritization schema as stated in the CES Policies and Procedures and become the highest prioritized groups. The Office of Care Coordination will collaborate with funding partners on how eligibility requirements of each Housing Opportunity will remain in place for this new prioritized group.

CoC funded PSH program providers are strongly encouraged to ensure that households enrolled into their respective program(s) are in good standing with their program. This includes but it is not limited to rent balances paid in full, active engagement in supportive services, and units having passed their most recent Housing Quality Standards (HQS) as defined by the U.S. Department of Housing and Urban Development in 24 CFR 5.703.

Prioritization:

1. CoC-Funded PSH Households at-risk of homelessness due to CoC Program changes
 - a. Households will be prioritized by anticipated program end date from soonest date to latest date.
 - b. Households will be prioritized by oldest approximate date homelessness episode began as entered in the household's current PSH program enrollment.
 - c. Households will be prioritized by the length of their current CoC-funded PSH program enrollment from longest program enrollment to shortest.
2. CoC-Funded RRH Households at-risk of homelessness due to CoC Program changes

- a. Households will be prioritized by anticipated program end date from soonest date to latest date.
- b. Households will be prioritized by oldest approximate date homelessness episode began as entered in the household's current RRH program enrollment.
- c. Households will be prioritized by the length of their current CoC-funded RRH program enrollment from longest program enrollment to shortest.

Note: Page 19 of the CES Policies and Procedures details the prioritization schema, as follows:

3. Households experiencing Chronic Homelessness
 - a. Households with a chronic disability who are currently experiencing sheltered or unsheltered homelessness and who have been experiencing homelessness (a) for at least the last 12 months straight OR (b) on at least four separate occasions in the last three years for a combined minimum of 12 months.
4. Households with a Chronic Disability
 - a. Households who are experiencing literal homelessness but who do not meet the length of time requirements to be experiencing chronic homelessness but who have a disability that is expected to be ongoing, substantially impedes their housing stability, and could be improved by more suitable housing.
5. Households without a Disability
 - a. Households experiencing literal homelessness who do not have a disability as defined above.
6. Households at risk of homelessness
 - a. Households at risk of homelessness are not eligible for many of the opportunities prioritized through CES, but if eligible will generally be the last priority group.

Next Steps:

If the above prioritized groups and established CES prioritization schema is approved by the CoC Board, the Office of Care Coordination, as the Collaborative Applicant and CES Lead, will inform CES Administrators of the necessary changes. The Office of Care Coordination will educate the CES Administrators on the impacted CoC Program funded PSH programs and provide training on the procedures to be followed.

In support of timely referrals, the Office of Care Coordination reserves the right to have these referrals made outside of a live Housing Provider Match Meeting as it will support households to maximize the amount of time during the application process and allowing for coordination between providers. CoC funded PSH program providers will be asked to ensure that households have the most current housing assessment completed to ensure any referrals to new Permanent Housing opportunities are aligned with the households' housing preferences.

Date: November 19, 2025

Subject: Homeless Management Information System (HMIS) Data Requests

Recommended Actions:

- a. Approve the Office of Chairman Doug Chaffee, Fourth District, HMIS data request for the period of November 1, 2024, through October 31, 2025, for a one-time export of aggregate data to be used for the Emergency Rental Assistance Program (ERAP) administered by District 4.
- b. Approve the Office of Care Coordination's HMIS data request beginning January 1, 2023, and ongoing, for client-level data for the purpose of conducting a cross-referencing analysis with records from the Orange County Sheriff's Departments to determine whether persons experiencing homelessness were engaged with the Homeless Response System prior to their death, to be reported aggregately.

Background

In accordance with the [HMIS Policies and Procedures](#), data requests for data that will be released publicly are approved by the Orange County Continuum of Care (CoC) Board (CoC Board) prior to any data being released. Once approved, data requests are carried out by Orange County United Way, 2-1-1 Orange County (211OC) as the HMIS Lead for the Orange County CoC.

Office of Chairman Doug Chaffee's Request

On October 28, 2025, 211OC received a data request from the Office of Chairman Doug Chaffee to receive a one-time export of aggregate data for the reporting period November 1, 2024, through October 31, 2025. This request includes clients in Coordinated Entry, Street Outreach, Emergency Shelter, Transitional Housing, Rapid Re-Housing, Permanent Supportive Housing, and Other Permanent Housing projects.

Orange County Fourth District Supervisor and Chair of the Board of Supervisors, Doug Chaffee, established the Fourth District Emergency Rental Assistance Pilot Program (ERAP) on January 23, 2024, in partnership with the Friendly Center. The program aims to prevent homelessness by keeping at-risk households stably housed while addressing root causes through case management and stabilization services. As a pilot, ERAP evaluates the impact of this intervention on participants' housing stability, risk of future homelessness, and other outcomes. The ERAP Data Report will illustrate participant circumstances before and after program participation. The data utilized for the report includes information from intake forms and follow-up surveys, which are still being conducted to ensure a sufficient response-rate.

The ERAP Data Report will ideally support the development of a countywide prevention program. To do so, our office is requesting aggregate data from the CoC to understand system needs and gaps. This data will be incorporated into 1-2 slides of the ERAP Data Report. While the report will remain internal due to data limitations, it will inform the creation of a countywide prevention program. It may be shared with internal, Orange County agencies, or future partners and contractors which support the creation of a prevention program. Additionally, the statistics themselves may be referenced in future Agenda Staff Reports (ASRs),

talking points, or used in other efforts to promote and strengthen Orange County's homelessness prevention infrastructure.

Aggregate Data being Requested

- Number of people newly experiencing homelessness (unduplicated people with project start dates during the reporting period)
- Number of people experiencing homelessness (unduplicated people with program enrollments during the reporting period, and no permanent housing move in date)
- Number of people permanently housed (unduplicated people with a move in date or program exit to a permanent housing destination during the reporting period)

Number of people searching for housing (unduplicated people active in Rapid Re-Housing, Permanent Supportive Housing, and Other Permanent Housing without a Housing Move-In Date)

Office of Care Coordination's Request

On October 2, 2025, 211OC received a data request from the Office of Care Coordination to receive quarterly exports of client-level data for all clients active in any project during the previous quarter that had an active HMIS Consent Form on file as of the end of the reporting period. If approved, the first export will be for the reporting period 1/1/23 through 12/31/25, and ongoing exports will be sent on a quarterly basis for clients active during the previous quarter.

The Coroner Division of the Orange County Sheriff's Department leads the Homeless Death Review Committee (Committee), commissioned by Orange County Sheriff Don Barnes in January 2022. The Committee includes a diverse group of technical experts representing county agencies, municipal police departments, hospitals, and non-profit organizations. The Committee's purpose is to examine the root causes of deaths among people experiencing homelessness and to identify any contributing factors that may have been preventable.

As an active member of the Committee, the Director of Care Coordination has identified an opportunity to assess the extent to which individuals who died while experiencing homelessness had interacted with the Homeless Response System. This information can enhance understanding of the vulnerabilities faced by people experiencing homelessness, how they access homeless services, and which types of programs they engage with.

If the HMIS data request is approved, the Office of Care Coordination will compile and analyze data to present the findings quarterly as part of the Committee and included in the Report annually. The findings will be presented in tables that summarize the number of people experiencing homelessness who previously engaged in the Homeless Service System, along with the types of services accessed. To protect individual's privacy while still providing meaningful insight, only aggregate data will be used in the Report. The Report will highlight key trends, service engagement rates, and opportunities for system improvement.

By analyzing patterns in service utilization—such as frequency of contact, duration of program participation, and types of services accessed—the Homeless Death Review Committee can better understand how different subpopulations interact with the system. These insights may help identify gaps in service delivery, inform targeted interventions, and guide policy recommendations aimed at preventing future deaths among people experiencing homelessness.

The Committee publishes an annual report in Spring. This Report is typically accompanied by a press released from the OC Sheriff's Department, and often garners media attention. The Report will be presented to the CoC Board at the next meeting, following its release.

Data Elements being Requested

- 2.02 Project Name
- 2.02 Project Type
- 3.01 Name
- 3.03 Date of Birth
- 3.07 Veteran Status
- 3.10 Project Start Date
- 3.11 Project Exit Date
- 3.12 Destination

Date: November 19, 2025

Subject: Orange County Coordinated Entry System (CES) Evaluation

Recommended Actions

- a. Update on the Orange County CES Evaluation.
- b. Authorize the Office of Care Coordination, as the CES Lead and CoC Administrative Entity, and Orange County United Way, as the HMIS Lead, to work with the selected consultant and provide all needed, relevant data to carry out the Orange County CES evaluation.
- c. Approve the final report and summary of the Orange County CES Evaluation be presented to the CoC Board.

Background and Analysis

In alignment with HUD's Coordinated Entry (CE) Notice, CPD-17-01, the **Orange County Continuum of Care (CoC)** is required to conduct an **annual evaluation** of the CES to ensure that the system equitably, efficiently, and effectively connects people experiencing homelessness to housing and services.

In October 2025, the CoC released a **Request for Information (RFI)** seeking qualified consultants or agencies to conduct this evaluation. A total of **eight proposals** were received. The review committee, composed of system leaders, evaluation experts, and community partners, includes:

- **Dr. Shauntina Sorrells**, Chair, Orange County CoC Board; Chief Program Officer, Samueli Foundation
- **Nishtha Mohendra**, Vice Chair, Orange County CoC Board; Executive Director, Families Forward
- **Aubrey Sitler**, Strategic Plan Manager; Orange County CoC Consultant
- **Angela Reilly**, Program Manager, Samueli Foundation; former Director of Compliance for a CES-participating nonprofit organization
- **Two senior consultants from The Bridgespan Group**, serving as external reviewers

The **CoC Administrative Entity** and **CES Administrative Entity (County of Orange)** abstained from participation to maintain objectivity, as both will be evaluated under the scope of this process.

The review committee applied the **CES Evaluation Rubric**, which emphasizes stakeholder engagement, equity, and local systems understanding. Evaluators met to review all submissions, discuss qualitative and quantitative scores, and reach consensus on the top-rated firm.

After reviewing eight proposals, committee scoring, and follow-up clarifying questions, the CES Evaluation Review Committee has selected **Element Consulting Group** as the recommended consultant for the **Annual Evaluation of the Orange County Coordinated Entry System (CES)**. Additionally, **Orange County United Way (Sue Parks)** will be the **contract holder**, supported by a Samueli Foundation grant. The committee was able to identify the **recommended consultant by November 10, 2025**, with a **contract execution and project kickoff anticipated in early December**. The Element Consulting Group will hold a kickoff meeting within two

weeks of contract execution and submit an evaluation plan within 30 days. The CES Evaluation Review Committee highlighted key points about Element Consulting Group's approach that align with the approach to the CES Evaluation, including:

1. Strong **stakeholder engagement**, including lived experts, providers across the system, and cross-system partners
2. A clear **equity lens** and focus on how CES functions for different populations and SPAs
3. Coordination with the new **Homebase fiscal/resource mapping** work so we don't duplicate gap/fiscal analysis
4. Actionable recommendations for CES policies, governance, and operations that can return to the CoC Board

Evaluation Process

Each reviewer independently scored all proposals using the **2025 CES Evaluation Rubric**, which weighted **stakeholder engagement** and **local systems understanding** most heavily.

Scores and qualitative notes were then discussed in a facilitated review session to ensure alignment and consistency. The committee reached consensus on overall ratings, identified each firm's strengths and differentiators, and determined a top-rated consultant.

Next Steps and Timeline

A small, CoC-aligned group (including County/CoC representation, lived experience, providers, and the Samueli Foundation) will help guide the workplan and use of findings. Next steps are outlined below.

- **Board update:** November 19, 2025
- **Contract execution:** Early December 2025
- **Kick-off meeting:** Within 2 weeks of contract
- **Evaluation plan submitted:** January 2026

This transparent process ensures that the CoC's CES Evaluation reflects broad stakeholder input and aligns with the system's goals for equity, accountability, and continuous improvement.

Attachments

- Attachment A – CES Evaluation Rubric
- Attachment B – List of Proposals Received

Orange County CoC CES Evaluation Proposal Review Rubric

To ensure fair and consistent review of proposals submitted in response to the 2025 Orange County Continuum of Care (CoC) CES Evaluation RFI, this rubric provides structured criteria and scoring guidance for the selection committee.

Scoring Scale

Score	Definition
5	Excellent – Fully meets and exceeds expectations; clear, detailed, and compelling
4	Strong – Meets all expectations with minor gaps
3	Adequate – Meets most expectations; some details unclear or limited
2	Weak – Significant gaps or unclear approach
1	Poor – Does not address the requirement

Evaluation Criteria and Scoring

1. Understanding of Purpose & Scope (15 points)

Demonstrates clear understanding of the Orange County CoC's CES, HUD evaluation requirements, and intended outcomes. Identifies key challenges and opportunities in CES evaluation and proposes a relevant, realistic approach. Shows awareness of Orange County's local context, demographics, and system complexity.

Reviewer Score (1–5)	Comments / Notes

2. Evaluation Design & Methodology (25 points)

Presents a well-structured evaluation plan consistent with HUD's CPD-17-01 and the Coordinated Entry Management and Data Guide. Integrates both qualitative and quantitative methods (surveys, focus groups, HMIS data, etc.). Specifies indicators, data sources, and analysis strategies aligned with the four core HUD evaluation questions. Includes a feasible timeline, milestones, and deliverables within the 12-month project window.

Reviewer Score (1–5)	Comments / Notes

3. Stakeholder Engagement Plan (25 points)

Clearly articulates how the consultant will engage and coordinate with the Office of Care Coordination, CES Lead and Committee, HMIS Lead, providers, and lived experts. Demonstrates inclusive and culturally responsive engagement strategies that reflect Orange County's demographic diversity. Details frequency, structure, and quality measures for stakeholder engagement (e.g., meeting cadence, feedback loops). Shows how stakeholder input will inform findings and recommendations.

Reviewer Score (1–5)	Comments / Notes



4. Experience & Qualifications (20 points)

Demonstrates prior experience conducting CES or similar CoC evaluations. Shows strong understanding of HUD frameworks, performance measures, and CoC operations. Includes staff bios or narratives illustrating relevant technical and project management expertise. Highlights successful examples or samples of similar deliverables.

Reviewer Score (1–5)	Comments / Notes

5. Budget & Cost Reasonableness (15 points)

Budget aligns with proposed scope and deliverables. Cost drivers and billing rates are clearly explained. Budget reflects efficient use of resources (staff, travel, incentives, etc.) within the up-to-\$250,000 range. Proposal demonstrates flexibility and transparency in pricing structure (fixed price or time & materials).

Reviewer Score (1–5)	Comments / Notes

Total Score Summary

Criterion	Weight	Weighted Score
1. Understanding of Purpose & Scope	15	
2. Evaluation Design & Methodology	25	
3. Stakeholder Engagement Plan	25	
4. Experience & Qualifications	20	
5. Budget & Cost Reasonableness	15	

Total Possible Points: 100

Name of Proposal/Organization:

Name of the Evaluator:

Attachment B – List of Proposals Received

The Samueli Foundation received **eight proposals** in response to the **2025 CES Evaluation Request for Information (RFI)** released in October 2025.

Each proposal was reviewed by the evaluation committee using the CES Evaluation Rubric.

Organization / Lead Firm	Overview / Notes
CSH – Corporation for Supportive Housing	National leader in housing systems evaluation; extensive Orange County and California presence; strong stakeholder engagement plan with lived-experience stipends.
Abt Global	National HUD TA provider; robust methodology and multilingual engagement capacity; strong focus on data analysis and equity outcomes.
Homebase	Experienced CES evaluation partner; emphasizes policy alignment and field-based data collection; trauma-informed methods.
Focus Strategies	Data-driven consultant team; mixed-method evaluation design; includes structured engagement with providers and CoC partners.
Element Consulting Group (ECG)	National firm with government systems experience; offers phased evaluation and qualitative engagement approach.
Informed by Data (IBD)	Regional analytics and evaluation firm; proposes structured data validation and advisory group model.
Julie McFarland Consulting LLC	Consultant with deep CES implementation experience; centers evaluation in lived expertise and qualitative storytelling.
Cleveland/Cuyahoga Model Proposal (Housing Innovations)	Comparative CES framework informed by peer community model; focuses on system learning and benchmarking.

Summary:

All eight proposals met the RFI's minimum eligibility requirements.

The evaluation committee applied consistent scoring criteria to identify the top-rated consultant best positioned to conduct the Orange County CES Evaluation in alignment with HUD and CoC priorities.

Date: November 19, 2025

Subject: Policies, Procedures and Standards (PPS) Committee Recommendation

Recommended Action:

- a. Approve the proposed 2-for-1 Match Policy as recommended by the Coordinated Entry System (CES) Steering Committee and Lived Experience Advisory Committee, as a time-limited pilot for up to six (6) months, inclusive of a review at three (3) months, with a report of data evaluation returned to the PPS Committee no later than March 2026, as recommended by the PPS Committee.

Background and Analysis

The Office of Care Coordination, as the CES Lead for the Orange County Continuum of Care (CoC), utilizes the CES Policies and Procedures to guide the prioritization and match process to connect people to housing through CES. Typically, this includes matching a single household to a single unit, however, some of the local Public Housing Authorities have previously requested an additional match per a single vacant unit. While no formal policy or guidance currently exists within the CES Policies and Procedures, this practice was allowed to occur in a few instances to mitigate the amount of time a unit was left vacant.

As this practice began to be used more frequently in 2024 and 2025, some of the Public Housing Authorities requested for a formal policy or guidance to be issued. The Office of Care Coordination developed and proposed a 2-for-1 Match Policy (Policy) for housing providers that wish to opt-in to this process for specific units and vacancies. The aim of this policy is to establish the criteria and steps for the 2-for-1 match process, ensuring transparency for participants involved. In creating this guidance, the Office of Care Coordination considered partner feedback around the lease-up and turnover process, prior practice of these matches in this and other communities, and the experience of participants in this process. Specific goals include providing a person-centered and trauma-informed approach, ensuring existing housing programs are utilized to the highest extent possible and enabling success for new housing programs to attract continued support from the local development community to create more housing.

The Policy documents the situations in which the Office of Care Coordination will consider a 2-for-1 match request, including:

1. A unit has been vacant for 15 days, and
2. A need to meet financing and other deadlines near the end of initial lease-up for new properties.

Additionally, the Policy outlines requirements around these requests. This includes a requirement for the confirmed agreement of all stakeholders in the lease-up process, to emphasize consensus and collaboration. In order to enable participants to make informed choices about accepting a secondary match, the Policy also includes a form for the matched households to complete. The Policy also stipulates

that while both households referred to as a primary and secondary match can go through the application process at the same time, the household assigned as a secondary match cannot move in unless the primary match is denied or returned as unresponsive by the housing provider, or unless the primary match declines the housing opportunity. This is to create a more equitable process rather than a “first-come, first-served” process, where the participant with the least barriers will have the advantage to move in. Participants face differing barriers to attaining necessary documents, some of which affect people based on membership in protected groups or other arbitrary factors. For example, participants who had to change their name based on marriage, divorce, or other reasons may need to get documentation of that name change. Further, some participants may face greater difficulty obtaining birth certificates or other documents based on the jurisdiction they were born in, due to distance, different procedures, or other reasons. In avoiding a “first-come, first-served” process, the Office of Care Coordination seeks to honor the guiding principles of Coordinated Entry in prioritizing fair and transparent access to limited housing for those in the most need.

The proposed Policy was first shared during the July 9, 2025, CES Steering Committee Meeting. The Office of Care Coordination received initial feedback from those in attendance, including representatives from CES Administrators, local cities, service providers, and Public Housing Authorities, and noted that a public feedback period would be held before the Policy returned to the CES Steering Committee in September 2025. A public feedback period was then opened from July 10 – July 25, 2025, and announced via the CoC and Coordinated Entry email distribution lists.

During the September 3, 2025, CES Steering Committee meeting, the Office of Care Coordination returned with a revised draft Policy, which incorporated feedback received from the committee participants and public feedback period. The CES Steering Committee meeting included representatives from two (2) of the local Public Housing Authorities, service providers, and CES Administrators. Discussion centered around the policy scenarios and criteria for requesting a 2-for-1 match, noting challenges that components of the current draft policy could pose specifically to housing providers. Ultimately, the CES Steering Committee recommended to approve the proposed CES 2-for-1 Match Policy for review and approval by the Lived Experience Advisory Committee, (LEAC), inclusive of the following changes:

- **Scenarios for Requesting a 2-for-1 Match:** Remove requirement of unit(s) approaching 60 day vacancy date; remove requirement for unit to be vacant or in the possession of a housing provider for at least 60 days before request can be made; and update to allow requests to be made if unit has been vacant or in possession of the housing provider for a minimum of 15 days, and if the unit is move-in ready.
- **Criteria for 2-for-1 Match Requests:** Update language to state that a housing provider will provide a secondary match a housing opportunity with the next available unit in their respective housing inventory, with the goal of housing the secondary match within 45 days (rather than requiring them to be housed within 45 days), if both a primary and secondary match are approved and the primary match signs a lease.

The Office of Care Coordination presented jointly with Andrew Crowe, CES Steering Committee Chair, at the October 1, 2025, LEAC meeting, reflecting discussion that took place at the September CES Steering Committee meeting. Discussion amongst LEAC members focused on the experience of the Secondary Match as well as operational considerations within the Homeless Management Information System (HMIS) platform, and overall highlighted support for the proposed Policy. The LEAC requested that should the Policy be approved, that the Office of Care Coordination facilitate an evaluation after one year of implementation. Further, it was recommended that any proposed changes to the Policy return to the LEAC

for review and approval. Following discussion, the LEAC voted unanimously to recommend the drafted Policy proceed to the Policies, Procedures and Standards (PPS) Committee for review and approval.

The Office of Care Coordination presented at the November 10, 2025, PPS Committee special meeting, reflecting discussion that took place at both the September CES Steering Committee and October LEAC meeting. Discussion amongst PPS Members was focused on the implementation of the proposed Policy, emphasizing the importance of proper training and additional feedback from CES lead agencies and access points, particularly regarding the 2-for-1 match approach. PPS Members sought greater clarity on the policy's language to ensure participants fully understand the implications of their consent, including potential removal from the community queue, the possibility of not being placed in housing if identified as the second match, and the overall process and timeline. As a result, the PPS Committee created a substitute motion to initiate a pilot up to six months of the Policy, with a review at the three-month mark to evaluate its effectiveness in improving housing placements and increasing utilization of vacant units. The data collected during the pilot will inform whether the Policy should be adopted long-term within the Orange County CoC. The PPS Committee unanimously approved the substitute motion for the pilot of the Policy to proceed to the CoC Board for review and approval.

Feedback received during the public feedback period and from the September 3, 2025, CES Steering Committee, October 1, 2025, LEAC, and November 10, 2025, PPS Committee was compiled into **Attachment A** for reference. Following the CES Steering Committee, the Office of Care Coordination worked with Andrew Crowe, as the CES Steering Committee Chair, to confirm that the feedback and recommendations from the committee discussion were accurately reflected in the revised draft of the Policy. The CoC Board is being asked to review and approve the CES 2-for-1 Match Policy in **Attachment B** for the time-limited pilot. If approved, the Office of Care Coordination will work with CES Lead agencies, access points, and service providers to train and implement a pilot of up to six months for the 2-for-1 Match Policy. The Office of Care Coordination will return to the PPS Committee no later than March 2026 with data evaluation from the time-limited pilot.

Attachments

Attachment A – 2-for-1 Match Policy Feedback Received

Attachment B – 2-for-1 Match Policy – Redlined Version

Attachment C – Sample 2-for-1 Match Confirmation Form

Attachment D – Sample 2-for-1 Match Request Form

Coordinated Entry System (CES) 2-for-1 Match Policy
Feedback Received from July 2025 – October 2025

2-for-1 Match Policy Public Feedback Received July 10, 2025 – July 25, 2025

Topic	Feedback	Response	Additional Details
Concurrent processing of both matches	Proposed policy requires that the Secondary match only proceeds with the application process after a determination from the Primary match is made	Revised policy: Both Primary and Secondary matches can have the application reviewed concurrently. Primary match will be considered first and a Secondary match will be considered second for the housing opportunity.	
Confirmation of 2-for-1 Match Submission	Request that all housing and supportive service providers are in agreement prior to approval of 2-for-1 Matches	This language was previously incorporated into original draft of the Policy.	
Housing opportunities presented to Secondary Match	Request that Secondary match maintains similar unit type, i.e. Mental Health Services Act (MHSA) to MHSA; Project Based Voucher (PBV) to PBV	Added clarifying language to match this feedback received	
	Recommend Secondary match being utilized as a primary match for a unit within same property as a vacancy becomes available	Policy states Secondary matches must maintain their original unit matched. However, should the Secondary match become fully approved, they will be presented with the next available unit within the housing provider's inventory.	

Timeframe to return a Secondary match who declines accepting being a Secondary match	Request that housing providers return the Secondary match back to the Community Queue in three (3) days	Policy maintains originally drafted language of seven (7) days to return Secondary match to Community Queue. Three (3) days will be extremely difficult for OCC staff to maintain administrative role and confirm with accepting CES Access Point	
Criteria when 2-for-1 Matches can be requested	Requesting transparent criteria for when a 2-for-1 match may be requested	Policy includes two main scenarios for when a 2-for-1 Match can be submitted with additional clarifying criteria	
HMIS technical capabilities	Housing providers should need to submit or enter two separate housing opportunities in HMIS for same unit	Policy includes language that for each approved 2-for-1 Match Request includes two separate housing opportunities to be entered	
Confirmation of accepting a Secondary Match	Concern that a Secondary match would not be presented other housing opportunities while matched as a Secondary match	Policy states that HMIS does not have the technical capability to have one household have two concurrent housing program referrals. Thus the Secondary matches will not being presented other housing opportunities. Secondary match will sign confirmation form confirming understanding.	
Identifying a Secondary Match	The process of how a Secondary match is identified is unclear within Policy	Policy contains step by step example of how a Secondary match is identified on the Community Queue	

Dynamic matching for Secondary Match	Secondary match should be allowed to be prioritized for a dynamic match request, should they not move-into a unit for which they were the Secondary match	Secondary matches can decide to return to the Community Queue at any time. Should a Secondary match choose to be returned to the Community Queue, the CES Access Point can submit a dynamic prioritization request where a consensus is needed during each match meeting.	
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CES Steering Committee Feedback Received during the July 9, 2025, Meeting

Topic	Feedback	Response	Additional Details
General support	Support enacting a 2-for-1 match policy to prevent delays in filling vacant units	Feedback was recorded.	
Required Timeframe	Suggest shortening the time frame a unit must be vacant for a 2-for-1 match to be requested, from 90 days to 60 days.	Revised policy: Policy was updated to reflect the requested timeframe a unit must be vacant from 90 days to 60 days	
Simultaneous processing	The policy should explicitly state applicants should go through the eligibility process at the same time.	Revised policy: Policy was updated to allow both Primary and Secondary matches to begin the application process concurrently	
Clarity on process and timeframes	Request for more information around timeframes and a clarifying graphic	Originally drafted Policy contained timeframe for each step except for application/background review	

Consideration of secondary matches	Due to the undetermined time in being processed for a match, some back-up option (such as being prioritized for future dynamic matches) should be provided to the secondary match to account for the time they spent being processed.	Secondary matches can decide to return to the Community Queue at any time. Should a Secondary match choose to be returned to the Community Queue, the CES Access Point can submit a dynamic prioritization request where a consensus is needed during each match meeting	
Timeframes	Further discussion should be held if housing provider timelines are expected to change with new policies.	The Office of Care Coordination will track all 2-for-1 matches and analyze any data and implement revisions based on findings	

CES Steering Committee Feedback Received during the September 3, 2025, Meeting

Topic	Feedback	Response	Additional Details
Criteria when 2-for-1 Matches can be requested	Remove 60-day vacancy requirement (and any language that indicates 60 days) before requesting matches, and change it to 15 days	Revised policy: The 15-day vacancy requirement was incorporated as part of the approved Policy by the CES Steering Committee. The Office of Care Coordination originally revised this section from 90 days to 60 days in a previous iteration.	The Office of Care Coordination confirmed revised Policy language with CES Steering Committee Chair prior to LEAC meeting.
	Remove requirement to house the Secondary match in 45 days, change to house to the next available unit	Revised policy: Language was added to further clarify that the Secondary match would be presented the “next available unit with the goal of housing the Secondary match within 45 days” as part of the approved Policy by the CES Steering Committee	The Office of Care Coordination confirmed revised Policy language with CES Steering Committee Chair prior to LEAC meeting.

Lived Experience Advisory Committee Feedback Received during the October 1, 2025, Meeting

Topic	Feedback	Response	Additional Details
HMIS technical capabilities	Inquired whether HMIS has the ability to support maintaining a Secondary match on the Community Queue and a referral to another housing opportunity at the same time.	Currently there is no option for any match to remain on the Community Queue while maintaining a housing referral. The Office of Care Coordination would need to consult with Orange County United Way's 2-1-1 Orange County (211OC) as the HMIS Lead, to determine if this a possibility.	

Policies, Procedures and Standards Committee Feedback Received during the November 10, 2025, Special Meeting

Topic	Feedback	Response	Additional Details
2-for-1 Match Training	Inquired who will be responsible for training CES Leads, Access Points and other providers opting in to use the 2-for-1 match policy	Currently there is no set designated entity in charge of training, but likely the Office of Care Coordination (OCC) will support with creating trainings and ensuring trainings for all entities opting into a 2-for-1 match policy	
Policy Evaluation	Inquired if there can be an evaluation established within three (3) months of the policy implementation to ensure that intended outcomes are being displayed and not further challenging the issues	Revised Recommended Action: To include a pilot policy for 2-for-1 match policy for no more than six (6) months, with an evaluation at three (3) months to show data outcomes to the Policies, Procedures and Standards Committee no later than March 2026	

Policy Implementation Issues (Timeframes)	Inquired about the amount of housing opportunities that will be made available for 2-for-1 match if certain timeframes are implemented for filling vacant housing opportunities	Provided clarity that previous committees reviewing the timeline amended the action to shorten it from 160 days to 15 days.	
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2-for-1 Match Policy and Procedure

~~August-September~~ 2025

CoordinatedEntry@ceo.oc.gov | ceo.ocgov.com/care-coordination/homeless-services/coordinated-entry-system

Contents

Background	2
Scenarios for Requesting a 2-for-1 Match	2
Criteria for 2-for-1 Match Requests	3
Procedure.....	4
How to Request a 2-for-1 Match	5

DRAFT



2-for-1 Match Policy and Procedure

~~August-September~~ 2025

CoordinatedEntry@ceo.oc.gov | ceo.oc.gov/care-coordination/homeless-services/coordinated-entry-system

Background

The 2-for-1 Match Policy and Procedure provides guidance to when and how 2-for-1 matches can be requested by Housing Providers, as well as the needed communication with households who are the identified secondary match.

Housing Providers (housing provider, public housing authorities, developer, etc.) may request a secondary match for a single unit vacancy, commonly referred to as 2-for-1 matches. In this practice, the two (2) households from the Coordinated Entry System (CES) Community Queue are matched to one (1) housing opportunity, as made available by the Housing Provider. This updates the households to a “pending referral” status in the CES Community Queue as they work through the application process for the housing opportunity that were made available.

The Homeless Management Information System (HMIS) does not have the technical capability to keep a household active on the CES Community Queue, while also matched to a housing opportunity as the “secondary match”. As such, households who have a “pending referral” status may not be considered for additional housing opportunities concurrently. The 2-for-1 matches will only be used with Office of Care Coordination approval.

Scenarios for Requesting a 2-for-1 Match

2-for-1 matches can only be requested by the Housing Provider, when one of the two following scenarios is applicable:

1. ~~Property has unit(s) that is approaching the 120-day vacancy date.~~ The request for 2-for-1 match can only be submitted ~~after the unit has been vacant for 60 days, and any of when~~ the following conditions are met:
 - a. ~~Unit has been in the possession of the housing provider for at minimum 60 days, Unit has been vacant for at minimum 15 days;~~
 - b. Unit has been ~~move-in in the possession of the housing provider for ready for~~ at minimum ~~60-15~~ days; and-
 - c. ~~And 60 days have passed since the original match request date. Unit is move-in ready~~
2. A newly opened property needs to achieve a specified occupancy rate by a specified date. The request for 2-for-1 match can only be submitted no earlier than 60 days before the specified date.

The Office of Care Coordination as the CES Lead reserves the right to request documentation confirming either of the data points previously listed with any 2-for-1 Match Request submissions.



2-for-1 Match Policy and Procedure

~~August-September~~ 2025

CoordinatedEntry@ceo.oc.gov | ceo.ocgov.com/care-coordination/homeless-services/coordinated-entry-system

Criteria for 2-for-1 Match Requests

When requesting a 2-for-1 Match, the Housing Provider is agreeing to processing the matches as detailed below. The following guidance must be followed to ensure that any 2-for-1 match requests are handled appropriately and that the process is trauma-informed by promoting safety, ensuring participant choice and autonomy, building trust, and providing a strengths-based, compassionate approach for all households involved. All guidelines points below are in alignment with current CES policies and procedures.

1. "Primary" and "Secondary" matches will proceed with the initial application process for the available unit. Housing opportunity will be reserved for Primary match and not utilize a "first come – first served" approach.
2. If a Primary match declines, is denied (including an appeal period if applicable), or is considered unresponsive after 14 days of no contact from the original match email date, then the housing opportunity will be made available for the Secondary match.
 - a. The Primary match will be returned to the Community Queue.
 - b. Should the Primary Match become unresponsive for a period of 30 consecutive days after beginning the application process, they will be considered unresponsive and can be returned to the Community Queue with approval from all parties including the assigned case manager.
3. In the event that both Primary and Secondary matches become fully approved, the Secondary match is not allowed to be returned to the Community Queue (unless requested by the Secondary Match). Should the Secondary Match not request to be returned to the Community Queue the requesting housing provider must will provide the Secondary match a housing opportunity in their respective housing inventory with the next available unit, and with the goal of housing the Secondary match within 45 days.
 - a. Whenever possible, the housing provider will prioritize offering the Secondary match a similar and/or comparable housing opportunity to the original housing opportunity.
 - i. (Mental Health Service Act Units to Mental Health Service Act Units, Project Based Voucher to Project Based Voucher, location, unit size, ADA needs, etc.)
4. Only when both matches are denied, decline, considered unresponsive, or a combination of the three, may the Housing Provider can submit another 2-for-1 match request form for that same unit for two new matches.
 - a. This means that a new Secondary match cannot be requested, after the Primary match is denied, declines, or considered unresponsive.
 - b. A matched household, Primary or Secondary, will be considered unresponsive after 14 calendar days from the original match email date.
5. All stakeholders (Property Manager, Public Housing Authority, developer, supportive services provider, etc.) associated with the specific housing opportunity where a 2-for-1 match request is being requested must agree with the 2-for-1 match request. The Office of Care Coordination will verify via email with all stakeholders that this agreement exists.



2-for-1 Match Policy and Procedure

~~August-September~~ 2025

CoordinatedEntry@ceo.oc.gov | ceo.oc.gov/care-coordination/homeless-services/coordinated-entry-system

6. The Secondary household matched must sign (wet or digitally) the 2-for-1 Secondary Match Confirmation indicating authorization of removal from the CES Community Queue and must be returned to the Office of Care Coordination via email to the original match email within seven (7) calendar days after being received.
 - a. The Office of Care Coordination will follow up with the staff member who submitted the 2-for-1 Secondary Match Confirmation form if the form has not been signed by the secondary household by the seven (7) days.
 - b. On the 8th day, the secondary household match will be voided and returned to the CES Community Queue.
7. Secondary matches reserve the right to be returned to the CES Community Queue for other housing opportunities in which the household wishes to be considered for at any time.
8. 2-for-1 Match Requests are only available for two referrals for every one housing unit.
 - a. If there are two available units to accept referrals, Housing Providers must submit two separate match request forms and so on.

If any of the following steps are not followed, the Office of Care Coordination reserves the right to deny any future requests submitted by the same housing provider, public housing authority, or developer.

Procedure

The Secondary match will only be matched once all other primary matches have been identified based on the number of housing opportunities available for the specific match meeting taking place. This procedure is meant to ensure that the CES Prioritization Policy is followed, and that a household is not considered as a secondary match prior to being matched as a primary to other housing opportunities based on their length of homelessness, disabling conditions and other eligibility criteria.

Example: If there are three (3) units who received approval from the Office of Care Coordination for 2-for-1 Matches, this means that six (6) households will be removed from the CES Community Queue.

The first secondary match, would be the fourth household to appear on the CES Community Queue, and not the second household to appear on the CES Community Queue.

CES Community Queue and matches to Housing Opportunities:

1. John Doe ← Primary match to unit #1
2. Jane Doe ← Primary match to unit #2
3. John Smith ← Primary match to unit #3
4. Jane Smith ← Secondary match to unit #1
5. John Jones ← Secondary match to unit #2
6. Jane Jones ← Secondary match to unit #3



2-for-1 Match Policy and Procedure

~~August-September~~ 2025

CoordinatedEntry@ceo.oc.gov | ceo.ocgov.com/care-coordination/homeless-services/coordinated-entry-system

This practice will ensure that the higher prioritized households will be the primary match in the order of prioritization and maintain the integrity of the CES Community Queue that align with the CES policies and procedures as approved by the Orange County Continuum of Care.

Matches may not be shifted to other units in cases where a property has more than one (1) approved 2-for-1 Match Requests. All secondary matches must maintain their originally matched unit. This process will only be utilized after Office of Care Coordination approval and is outlined using the example above:

1. Both John Doe (primary) and Jane Smith (secondary) were matched to unit #1
2. Both John Doe and Jane Smith were returned to the Community Queue.
3. John Jones and as the highest prioritized remaining secondary match can be moved to the Primary match for unit #1.
 - a. A new 2-for-1 Match Request can be requested if John Jones is returned to the Community Queue.
4. All other remaining secondary matches will remain to the original matched unit.

Any Secondary Matches are only to be made after all current housing opportunities available have identified Primary Matches.

If any of the following steps are not followed, the Office of Care Coordination reserves the right to deny any future requests submitted by the same housing provider, public housing authority, and developer.

How to Request a 2-for-1 Match

Housing Providers requesting a 2-for-1 match, shall complete the following steps:

1. The Housing Provider must submit the [2-for-1 Match Request Form](#) for a specific housing opportunity to the CES Lead Agency, through the linked Google Form.
 - a. The Office of Care Coordination can supply this link as requested.
2. Once the Office of Care Coordination reviews a request for completion and additional verification as needed, the Office of Care Coordination will respond with an approval or denial of the request within three (3) business days from the date of form submission.
 - a. If approved proceed to step 3
 - b. If denied proceed to step 5
3. If the Office of Care Coordination has approved the request in writing, the Housing Provider may proceed to enter the two separate housing opportunities into HMIS.
 - a. All 2-for-1 match requests entered in HMIS must include a label of "Primary" or "Secondary" or be included in the opportunity description.
 - b. All 2-for-1 match requests will require a unit number to be entered into the HMIS opportunities.



2-for-1 Match Policy and Procedure

~~August-September~~ 2025

CoordinatedEntry@ceo.oc.gov | ceo.oc.gov/care-coordination/homeless-services/coordinated-entry-system

- c. These housing opportunities will receive matches the following week in which they were approved, and if the housing opportunities were entered by Friday, or last business day of the week, at 12pm, Pacific Standard Time.
4. A 2-for-1 Secondary Match Confirmation must be filled out by *both* CES Access Point case manager and the Secondary matched household (once the matches have been confirmed)
 - a. This document will be provided by the Office of Care Coordination via the original match email for the secondary matched household.
 - b. The 2-for-1 Secondary Match Confirmation must be completed and returned within seven (7) calendar days from the date of the original match email.
5. If the 2-for-1 Match Request is denied, the Office of Care Coordination will provide reason for the denial via email to the original requesting staff member as indicated in the 2-for-1 Match Request Form. The Housing Provider may appeal the decision by responding to the denial email that was sent by the Office of Care Coordination indicating that the 2-for-1 Match Request was denied. The appeal should include any pertinent information that clearly illustrates the need for a secondary match.
6. The Office of Care Coordination will respond to all appeals in a timely manner to ensure that if the decision is overturned, two matches can be received by the next planned match meeting.
7. For all approved 2-for-1 Match Request, weekly updates on the application process for the Primary match must be provided to the Office of Care Coordination via email at the coordinatedentry@ceo.oc.gov every Friday by 2pm with the most updated information. While updates are provided on the Secondary match regularly.
 - a. Failure to provide weekly updates on the application process and status for both households will result in automatic denial of future requests.

If any of the following steps are not followed, the Office of Care Coordination reserves the right to deny any future requests.

All questions regarding 2-for-1 Match Requests should be directed to coordinatedentry@ceo.oc.gov.



2-for-1 Match Confirmation

September 2025

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2-for-1 Secondary Match Confirmation

This form must be completed in its entirety and attached to the email reply, in the same thread as the original match email that was sent by the CES Match Maker. This form must be submitted within seven (7) calendar days from the date of the original match email. Failure to do so will result in the Office of Care Coordination voiding this Secondary match.

The following section is to be completed by the CES Access Point:

1. CES Access Point who accepted the Secondary match:

2. CES User who accepted this secondary match (first name, last name):

3. CES User email:

4. CES User contact phone number:

5. Name of housing opportunity that was accepted as used in the original match email:

6. Household's HMIS ID and full name as it appears in HMIS:



2-for-1 Match Confirmation

September 2025

CoordinatedEntry@ceo.oc.gov | ceo.ocgov.com/care-coordination/homeless-services/coordinated-entry-system

The following section is to be completed by the CES Household:

*You have been matched to a housing opportunity as a Secondary match. This means you are the second applicant to a unit in which a primary applicant was identified. If you choose to proceed as a Secondary match, you can begin the application process. Should the Primary match become approved for move-in, you will have the option to be returned to the Community Queue for other housing opportunities, or the housing provider will present you another as close as similar housing option as possible, within a goal of 45 days. **There is no definitive timetable as to when the Primary match will be approved or denied for the same housing opportunity.***

*As a Secondary match you will **not be matched to other housing opportunities** while the proceeding with the application process. As a Secondary match you can deny being a Secondary match at any time and be considered for other housing opportunities through the Community Queue as they become available. If you wish to deny being a Secondary match at a later time, please communicate this with your case manager.*

The benefit of being a Secondary match is that you are the next person to be matched to this specific housing opportunity, if and only if, the primary applicant declines or is denied for any reason. However, there is no definitive timetable, when the primary applicant will decline, or be denied for this opportunity.

You have the right to deny this Secondary match for any reason and wait for a housing opportunity where you can be considered a Primary match. A Primary match gives you priority to the housing opportunity when matched.

1. Are you aware that by accepting this Secondary match you will not be considered for any other housing opportunities (with no definitive timetable), including housing opportunities where you may have been considered a *Primary* match?

☐ Yes

☐ No

2. Do you accept being a Secondary match to this housing opportunity and understand you will only be considered for this housing opportunity only when and if the Primary match declines or is denied for any reason?

☐ Yes

☐ No

3. Please sign indicating you authorize and accept this Secondary match:

Date: _____



2-for-1 Match Request Form

September 2025

CoordinatedEntry@ceo.oc.gov | ceo.ocgov.com/care-coordination/homeless-services/coordinated-entry-system

2-for-1 Match Request Form

Question:	Response:
Please list your full name and title	
Please list your email address	
Please list your direct phone number	
Please list your CES participating agency name:	
Please list the Housing Opportunity or HMIS Program for which you are requesting a secondary match:	
Please list the unit number associated with this request:	
Please list any eligibility criteria for this unit (MHSA, Veteran preference, senior, etc). If none, type "N/A":	
Please indicate the public housing authority partnering with this housing community:	Anaheim Housing Authority Garden Grove Housing Authority Orange County Housing Authority Santa Ana Housing Authority N/A
Please list the property management organization partnering with this housing community	
Please initial your understanding of the following: As the CES participating agency and HMIS data entry agency, can you confirm that all parties, including the property manager, Public Housing Authority, and/or supportive services agency, have approved this 2-for-1 Match Request?	Initial
Please initial your understanding of the following: Do you understand that two housing opportunities must be entered into HMIS and include a label of "primary" and "secondary" or will be subject to deletion or not receiving a second match?	Initial



2-for-1 Match Request Form

September 2025

<p>Please initial your understanding of the following:</p> <p>Do you understand that should both the Primary and Secondary match be approved for the same unit; the Primary match will be the household who gets the unit? <u>*This means a “first-come-first-served” practice will not be utilized, and follows a trauma-informed care approach.*</u></p>	Initial
<p>Please initial your understanding of the following:</p> <p>Do you understand that should both the Primary and Secondary match be approved the same unit, the Secondary match is not allowed to be returned to the Community Queue (unless requested by the Secondary Match) and it is your responsibility to provide the Secondary match a housing opportunity in your respective housing inventory with the next available unit, and with the goal of housing the Secondary match within 45 days.</p>	Initial
<p>Please initial your understanding of the following:</p> <p>Do you understand that failure to comply with these guidelines may result in future 2-for-1 match requests being denied?</p>	Initial
<p>Please initial your understanding of the following:</p> <p>Do you understand that you will only be able to enter both housing opportunities <u>after</u> receiving written approval from the Office of Care Coordination?</p>	Initial
<p>Please initial your understanding of the following:</p> <p>Do you understand that a secondary match reserves the right to return to the CES Community Queue to be considered for other housing opportunities. <u>This will not allow for a new Secondary only match.</u></p>	Initial
<p>Please initial by the following statements as confirmation of your understanding and commitment to adherence to the 2-for-1 Match Policy as approved by the CoC Board. The 2-for-1 Secondary Match Confirmation form must be filled out by both the CES Access Point and CES Household who is the secondary match. The secondary match has the right to deny being a secondary match, if there is a denial, this will not result in receiving a secondary match.</p>	Initial