



COUNTY OF ORANGE
OFFICE OF CARE
COORDINATION

Policies, Procedures and Standards
(PPS) Committee Meeting
June 9, 2026

Welcome and Introductions

Nishtha Mohendra, Chair

Public Comments

Consent Calendar

Consent Calendar

Recommended Actions

1. Approve the PPS Committee Meeting Minutes from April 14, 2026.
2. Approve the PPS Committee Meeting Minutes from May 12, 2026.

Business Calendar

**Continuum of Care (CoC) Grievance
Policy and Procedure**
Felicia Boehringer, CoC Administrator,
Office of Care Coordination

Business Calendar – Item #1

CoC Grievance Policy and Procedure

- U.S. Department of Housing and Urban Development (HUD) requires a formal grievance policies for all CoC Program-funded projects, including HMIS and CES
 - Individual agencies already maintain grievance procedures, but systemwide consistency is beneficial
- In the planning for the Fiscal Year (FY) 2026 CoC Program Notice of Funding Opportunity (NOFO), potential funding uncertainties increases the need for a unified CoC-level policy.
- During the April 14, 2026, PPS Committee Meeting, discussion began around the need and desire for some type of system-level grievance policy and the Office of Care Coordination (OCC) reviewed the following:
 - Internal County grievance policies
 - Policies from other CoCs
 - Homebase's [Grievance Policy FAQ](#) and similar resources.

Business Calendar – Item #1

CoC Grievance Policy and Procedure

- Discussion continued during the May 12, 2026, PPS Committee Meeting, as the OCC presented an initial draft of the CoC Grievance Policy and Procedure for review and feedback.
- Committee members discussed the importance of reviewing existing grievance policies from CoC-funded agencies and requested clarification on HUD's specific requirements for grievance policies and procedures.
- The committee emphasized that the CoC Grievance Policy should clearly state that an agency's internal grievance process must be fully exhausted before a complaint is elevated to the CoC.
- Members also noted the need to outline grounds for appeal and to specify when decisions are considered final and no longer subject to further appeal.
- During the committee meeting, the OCC noted that additional feedback from PPS Committee members could be submitted after the meeting and provided an email to invite feedback from members who could not be in attendance.
- OCC agreed to bring the revised draft to the June 9, 2026, PPS Committee meeting to allow adequate time for review and additional input before moving it forward for recommended action.

Business Calendar – Item #1

CoC Grievance Policy and Procedure: Feedback Incorporated

- OCC incorporated feedback into the revised draft of the CoC Grievance Policy and Procedure available in **Item 1. Attachment A** and is seeking PPS Committee feedback. Revisions include:
 - Replacing the term “household” with “participant”
 - Added section establishing confidentiality and non-retaliation protections
 - Added section introducing an agency-level resolution requirement, with exception for discrimination, retaliation, or health and safety concerns
 - The policy availability section expanded to enumerate what a compliant agency procedure must contain, including timelines, appeal rights, and process descriptions.
 - The CoC review steps broadened:
 - Additional documentation types listed
 - Ten-business-day decision window gains an extenuating circumstances provision with corresponding written notification requirement
 - Scope of the post-resolution debrief is expanded to include staff training
 - The Board notification step revised to include an explicit confidentiality caveat
 - Added an Appeals Rights section with a placeholder for funding entity contact information, and expands the denial provisions to encompass reduction, suspension, and termination of assistance in addition to outright denial.
 - Two additional grounds for adverse action are identified: failure to meet program requirements and exhaustion or unavailability of funding.

Business Calendar – Item #1

CoC Grievance Policy and Procedure

Discussion

- What feedback do you have on the drafted CoC Grievance Policy and core elements to consider?

Next Steps:

- OCC plans to release a draft policy for wider review, specifically by CoC-funded agencies, prior to returning to the PPS Committee for recommended action.
- OCC is planning to work with the PPS Committee Chair and Committee to review Program Termination Procedures in future meetings.



**Fiscal Year (FY) 2026 CoC Program Notice of
Funding Opportunity (NOFO) Planning**

Felicia Boehringer, CoC Administrator,
Office of Care Coordination

Business Calendar – Item #2

FY 2026 CoC Program NOFO Planning

- On June 1, 2026, HUD released the FY2026 CoC Program NOFO
- The FY2026 CoC Program NOFO includes scoring criteria related to a Representative Governance Board (maximum 8 points)
 - Indicate a CoC decision-making governance board representative of the community that includes:
 - At least 1 person with current or former experience of homelessness (up to 1 point)
 - At least 3 elected public officials (or 1 elected official if the CoC is in a rural area) (up to 3 points)
 - **(4 points for including all of the below, 2 points for a majority of the below.)**
 - A representative of the business community such as a member of a Business Improvement District
 - A representative of law enforcement;
 - A representative of a recovery housing/sober living provider;
 - A representative from a behavioral or primary health provider such as from a Federally Qualified Health Center, CCBHC, Healthcare for the Homeless, or other accessible primary care provider
 - A representative of a local workforce development organization or system such as a member of the Local Workforce Development Board, State Workforce Agencies, or American Job Centers
 - A representative from a local court system managing Assisted Outpatient Treatment (AOT) and/or other civil commitment processes; or from specialty courts (e.g., Mental Health Court, Drug Court, Care Court.)

Business Calendar – Item #2

FY 2026 CoC Program NOFO Planning

- The OCC has proposed a strategy speaking to the CoC's partnership with the Commission to Address Homelessness as fulfilling this representation.
 - It is unclear if this strategy will be sufficient in HUD's view.
- Out of the **8 point maximum**, the Office of Care Coordination has estimated the CoC's score:
 - Points available with the current CoC Board representation: 1-2
 - Points available if HUD finds the Commission to Address Homelessness partnership sufficient: 6-7

Business Calendar – Item #2

FY 2026 CoC Program NOFO Planning

Discussion:

- Does the PPS Committee have feedback on the current strategy proposed in response to the CoC Program NOFO Representative Governance Board scoring?
- Additional questions?



Next Meeting:

*July 14, 2026, from 3:30 p.m. – 5:00 p.m., at
CAS Multipurpose Rooms 103/105, located at
601 N. Ross St., Santa Ana, CA 92701*



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