

**ORANGE COUNTY CONTINUUM OF CARE
POLICIES, PROCEDURES AND STANDARDS COMMITTEE
MEETING**

Tuesday, July 14, 2026

3:30 p.m. – 5:00 p.m.

Location:

County Administration South (CAS)

Multipurpose Room

601 N. Ross St., Rooms 103/105

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

Meeting ID: 953 0688 4695

Committee Chair: Nishtha Mohendra, Friendship Shelter

Committee Members:

Judson Brown, City of Santa Ana

Nichole Gideon, Individual

Marisol Johnson, Dayle McIntosh Center

Melanie McQueen, PATH

Dr. Tiffany Mitchell, Orangewood Foundation

Robert “Santa Bob” Morse, Individual

AGENDA

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.

Welcome and Introductions – Nishtha Mohendra, Chair

Public Comments – Members of the public may address the Policies, Procedures and Standards (PPS) Committee 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 PPS Committee. Public comments will be limited to three minutes. If there are more than five public speakers, this time will be reduced to two minutes. Members

AGENDA

July 14, 2026

of the public utilizing interpreter services will be given double the amount of time to provide public comment.

To address the PPS Committee during the Public Comment period, members of the public are to complete a Request to Address the Committee form prior to the beginning of each agenda item and submit it to Continuum of Care (CoC) staff. Staff will call your name in the order received.

Members of the public 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 meeting will be distributed to the PPS Committee members and all comments will be added to the administrative records of the meeting. Please include "PPS Committee Meeting Comment" in the email subject line.

CONSENT CALENDAR

1. Approve the PPS Committee Meeting minutes from June 9, 2026.

BUSINESS CALENDAR

1. **CoC Governance Charter Revisions** – Felicia Boehringer, CoC Administrator, Office of Care Coordination
 - a. Recommend the revised CoC Governance Charter, inclusive of updates to the CoC Board Composition (Section V.B.2.b) policy change in response to the Fiscal Year (FY) 2026 CoC Program Notice of Funding Opportunity (NOFO).
2. **CoC Policy to Advance Recovery and Prohibit Illicit Drug Use** – Felicia Boehringer, CoC Administrator, Office of Care Coordination
 - a. Recommend the policy detailing how the Orange County CoC will advance recovery and prohibit illicit drug use, in response to the FY2026 CoC Program NOFO, for review and approval by the CoC Board.

Adjournment to: Regular meeting on August 11, 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.

**ORANGE COUNTY CONTINUUM OF CARE
POLICIES, PROCEDURES AND STANDARDS COMMITTEE
MEETING**

Tuesday, June 9, 2026

3:30 p.m. – 5:00 p.m.

Location:

County Administration South (CAS)

Multipurpose Room

601 N. Ross St., Rooms 103/105

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Join by phone: +1 669 444 9171

Meeting ID: 953 0688 4695

Committee Chair: Nishtha Mohendra, Friendship Shelter

Committee Members:

Judson Brown, City of Santa Ana

Nichole Gideon, Individual

Shakoya Green-Long, Individual

Marisol Johnson, Dayle McIntosh Center

Melanie McQueen, PATH

Dr. Tiffany Mitchell, Orangewood Foundation

Robert “Santa Bob” Morse, Individual

MINUTES

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Welcome and Introductions – Nishtha Mohendra, Chair

Chair Nishtha Mohendra called the meeting to order at 3:30 p.m.

Present: Nichole Gideon, Marisol Johnson, Dr. Tiffany Mitchell, Nishtha Mohendra, Robert “Santa Bob” Morse

Absent Excused: Shakoya Green-Long, Melanie McQueen

Absent: Judson Brown

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CONSENT CALENDAR

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

Robert “Santa Bob” Morse motioned to approve the Consent Calendar. Marisol Johnson seconded the motion. Chair Nishtha Mohendra issued a voice vote. Motion passed unanimously.

BUSINESS CALENDAR

1. **CoC Grievance Policy and Procedure** – Felicia Boehringer, CoC Administrator, Office of Care Coordination

Felicia Boehringer provided background on the development of a formal CoC Grievance Policy and Procedure and discussed how this can support program participants during anticipated system changes in response to the Fiscal Year (FY) 2026 CoC Program Notice of Funding Opportunity (NOFO). Felicia Boehringer led discussion to receive feedback on the proposed policy and procedure, which was updated based on feedback provided in the May 12, 2026, PPS Committee meeting.

Committee Discussion:

- Dr. Tiffany Mitchell asked if the language around reviewing agency notes are also included in provider contracts, and whether the CoC is entitled to access case notes. Dr. Tiffany Mitchell also asked if confidentiality includes not disclosing names of providers receiving grievances to the CoC Board and suggested adding this language. Dr. Tiffany Mitchell also asked who would have final authority on the outcome of a grievance.

- Chair Nishtha Mohendra asked if clients would be able to access notes reviewed as part of the grievance process, and whether the notes being used are HMIS notes or notes from another source. Chair Nishtha Mohendra noted that this process is already occurring for grievances that have been escalated and the policy is a part of cleaning up the process and clarifying CoC involvement for funded agencies, highlighting that the CalOptima grievance process is a good reference for balancing an agency-led process and funder involvement.
- Nichole Gideon asked if the grievance policy is intended to be informative or instructive, whether the CoC can override agency decisions or if the policy would be used for future contract/grant decisions. Nichole Gideon suggested separating information for grievances related to programs ramping down or funding cuts and notifying those agencies applying for CoC funding in the future that they will be required to align their processes with the CoC policy. Nichole Gideon noted that this policy is helpful but will create an increased workload.
- Robert “Santa Bob” Morse asked if the appeal process is going to be standardized across all agencies, emphasizing that a fair appeals process will create fewer issues.
- Marisol Jonhson emphasized that intent is important and that documentation should be provided to verify that the participant has followed the agency’s internal procedures for grievances instead of immediately escalating. Marisol Johnson suggested including a disclaimer that providers have the final say in grievance outcomes.

2. FY 2026 CoC Program NOFO Planning – Timothy Kirkconnell, CoC Manager, Office of Care Coordination

Timothy Kirkconnell discussed a proposed strategy for involving additional representation within CoC Board governance, based on the rating criteria outlined in the FY2026 CoC Program NOFO, including the continued partnership with the Commission to Address Homelessness.

Committee Discussion:

- Robert “Santa Bob” Morse noted that if the Department of Housing and Urban Development (HUD) will accept the partnership with the Commission to Address Homelessness, that would be the best strategy for the CoC, and how other CoCs plan to respond to the new requirements.
- Nichole Gideon notes that the list of required representation is more comprehensive than it was in the CoC Program NOFO that was released in December. Nichole Gideon asked how voting on items such as program funding may change if the CoC is citing the Commission partnership, and discussed areas such as including the maximum number of CoC Board seats, how long those seats may take to fill, if an ad hoc could be used to fill gaps in representation, and whether using the Commission partnership would be temporary until the CoC Board can be re-worked. Nichole Gideon shared a desire to see the CoC Board kept separate from the Commission, was understanding of the need for meeting representation requirements.
- Chair Nishtha Mohendra discussed previous CoC Board composition decisions and the comprehensive thought process behind them while noting the CoC’s need to comply with NOFO requirements. Nishtha Mohendra explored the idea of an additional committee to meet required representation but emphasized that decisions would need to be made quickly as the CoC Program NOFO has a due date in August 2026. Nishtha Mohendra shared a desire to hear from other CoCs

on their approach and reminded the committee that while representation would not be “all or nothing” points, the points are crucial in the CoC Program competition.

- Dr. Tiffany Mitchell asked the composition of other CoC boards, and how likely it is that majority of CoCs will score higher in this area.

Chair Nishtha Mohendra adjourned the meeting at 4:28 p.m.

Adjournment to: *Regular meeting on 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*

Date: July 14, 2026

Subject: Continuum of Care (CoC) Governance Charter Revisions

Recommended Action:

- a. Recommend the revised CoC Governance Charter, inclusive of updates to the CoC Board Composition (Section V.B.2.b) policy change in response to the Fiscal Year (FY) 2026 CoC Program Notice of Funding Opportunity (NOFO).

Background

The FY2026 CoC Program NOFO reflects a number of changes related to the shifts associated with the U.S. Department of Housing and Urban Development (HUD) goals and objects. One of these changes is the inclusion of scoring criteria relating to Accountable Structure and Planning, more specifically Representative Governance Board work eight (8) points out of 200 points possible for the CoC Collaborative Application.

The FY 2026 CoC Program NOFO details the following requirements to receive the maximum points for the Representative Governance Structure:

“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.)”

Note: Orange County CoC is an urban CoC, so the three-elected-officials threshold applies.

This recommendation proposes amendments to the CoC Board Composition (Section V.B.2.b) to the Orange County CoC Governance Charter. The amendment adds the FY2026 CoC Program NOFO board-representation categories, expands the Board range of seats from its current 17 to 21 seats to 19 to 25 seats to allow increased membership that will be representative of the new categories, and clarifies that the

representation of people with lived experience of current or past homelessness of at least 30 percent of the Board, is inclusive of youth. is the recommended revisions are the most direct and defensible way to satisfy the FY 2026 CoC NOFO scoring criterion, which calls for a decision-making governance board that includes the specified representatives.

The Office of Care Coordination as the Collaborative Applicant explored leveraging the Commission to Address Homelessness and their relationship to the Orange County CoC Board, to look to satisfy the requirements in the FY2026 CoC Program NOFO. However, given that the Commission to Address Homelessness is not the decision-making body of the Orange County CoC, it would not satisfy the requirements and looking at amending the Commission to Address Homelessness Bylaws would require action by the Board of Supervisors, which would not be able to be adopted before the August 26, 2026 application deadline.

The Office of Care Coordination would like to note that if the recommended amendments are approved, the Orange County CoC Board has time to facilitate the recruitment of these seats and does not believe that the seats have to be filled by the August 26, 2026, application deadline. The new seats can be adopted now and left vacant without affecting quorum and recruitment can then proceed through the Charter's established fall nomination cycle with seating in January. Additionally, expanding the Board to 19 to 25 seats preserves the Board's existing required representation while accommodating the additional categories. The CoC Governance Charter's long-standing principle that one person may represent more than one category preserves flexibility within the cap.

- Quorum under Section V.B.2 is fifty percent plus one of seated voting members, so new seats can be created now and left vacant without raising the quorum bar.
- Recruitment then proceeds through the Charter's established nomination calendar in Section V.B.3.i, with the Nominating Ad Hoc in August and September, candidate outreach in the fall, election in November and December, and seating in January.

The CoC Governance Charter is the Orange CoC's own instrument, and the Board is responsible for developing and updating it, therefore the Board can adopt this amendment on its own authority at the next CoC Board meeting.

Approval of the recommended action will assist the Orange County CoC in securing 8 points for the Collaborative Application through the FY 2026 CoC Program NOFO, thus increasing its competitive score and likelihood of receiving funding for Tier 2 projects.

Attachments

Attachment A – Proposed Revisions to Section V.B.2.b of the CoC Governance Charter (Redlined)

Attachment B – Proposed Revisions to Section V.B.2.b of the CoC Governance Charter (Clean)

Item 1. Attachment A

Proposed Revisions to Section V.B.2.b of the CoC Governance Charter, Redlined

- b. The CoC Board shall have ~~17 to 21~~19 to 25 total CoC Board member seats, with an odd number of members appointed during each election. The makeup of the CoC Board shall include at least the following number of people with each of these experiences and backgrounds. One person may represent more than one of these experiences and backgrounds. By January 2027, the CoC Board will include at least one representative from the Youth Action Board (YAB).
- i. People who have experienced homelessness or housing instability. At least 30% of the CoC Board must be comprised of people with lived experience, though the CoC Board can prioritize including more in any given year. This includes:
1. One (1) seat will be determined by the Lived Experience Advisory Committee (LEAC). This could be the LEAC chair or someone else.
 2. One (1) seat will be determined by the YAB. This could be the YAB chair or someone else.
 - ~~2-3.~~ It is important to the CoC Board that the Board members with lived experience of homelessness represent an array of household and age makeups. However, because some people with lived experience may not want to disclose that experience publicly, there are no required seats for people from specific household types or age groups. Ideally, the Board is recommended but not required to include at least one person from each of the following groups:
 - a. Lived experience of homelessness as a Transitional Age Youth (TAY) in the last five (5) years
 - b. Lived experience of homelessness as a single adult
 - c. Lived experience of homelessness with their family
 - d. Lived experience of homelessness as an older adult
- ii. Elected Public Official. At least three (3) elected public officials must be represented in the CoC Board. Qualifying public officials may include city council members, mayors, members of the Board of Supervisors, District Attorney, school district of community college trustees, Orange County Board of Education, or special districts represented elected by the public.
- ~~iii.~~ People whose experiences reflect those of the people experiencing homelessness within the CoC. Each nomination and election cycle, the CoC Nominating Ad Hoc will utilize the most recently available data, including but not limited to HMIS, Point-in-Time (PIT) Count, and American Community Survey (ACS) data, to determine how to prioritize desired representation and expertise to ensure that the CoC Board membership background and experience recommendations align with current trends in who experiences homelessness in Orange County.
- ~~iii.~~iv. People who are currently representing, in a professional capacity, the following and/or people with current or past personal experience with any of the below listed areas of representation:
1. Veteran military service-focused agency (at least 1)
 2. Emergency Solutions Grant (ESG) Program funded agency or recipient agency (at least 1)
 3. Public Housing Agency (PHA) (at least 1)
 4. Domestic violence agency (at least 1)
 5. Education field / McKinney-Vento liaison (at least 1)
 6. Behavioral health field, which may include a Certified Community Behavioral Health Clinic (CCBHC) (at least 1)

Item 1. Attachment A

7. Health care field, which may include a Federally Qualified Health Center (FQHC), Healthcare for the Homeless, or other accessible primary care provider (at least 1)
8. TAY Agency (at least 1)
9. Family Agency (at least 1)
10. Business community, such as a member of a Business Improvement District
11. Law enforcement
12. Recovery Housing or Sober Living provider
13. Local workforce development organization, such as a member of the local Workforce Development Board, State Workforce Agencies, or American Job Centers
14. 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)
- ~~10-15.~~ 15. People with experience with the following parts of the system. Ideally, the CoC Board will include members who represent all parts of the system, but at minimum the CoC Board must include members who represent at least three (3) of the following:
 - a. Diversion
 - b. Street Outreach
 - c. Prevention
 - d. Emergency Shelter
 - e. Rapid Rehousing
 - f. Permanent Supportive Housing
 - g. Faith-based organization or community
 - h. Affordable housing development background

Item 1. Attachment B

Proposed Revisions to Section V.B.2.b of the CoC Governance Charter, Clean

- b. The CoC Board shall have 19 to 25 total CoC Board member seats, with an odd number of members appointed during each election. The makeup of the CoC Board shall include at least the following number of people with each of these experiences and backgrounds. One person may represent more than one of these experiences and backgrounds. By January 2027, the CoC Board will include at least one representative from the Youth Action Board (YAB).
- i. People who have experienced homelessness or housing instability. At least 30% of the CoC Board must be comprised of people with lived experience, though the CoC Board can prioritize including more in any given year. This includes:
 - 1. One (1) seat will be determined by the Lived Experience Advisory Committee (LEAC). This could be the LEAC chair or someone else.
 - 2. One (1) seat will be determined by the YAB. This could be the YAB chair or someone else.
 - 3. It is important to the CoC Board that the Board members with lived experience of homelessness represent an array of household and age makeups. However, because some people with lived experience may not want to disclose that experience publicly, there are no required seats for people from specific household types or age groups. Ideally, the Board is recommended but not required to include at least one person from each of the following groups:
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 - c. Lived experience of homelessness with their family
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 - ii. Elected Public Official. At least three (3) elected public officials must be represented in the CoC Board. Qualifying public officials may include city council members, mayors, members of the Board of Supervisors, District Attorney, school district or community college trustees, Orange County Board of Education, or special districts represented elected by the public.
 - iii. People whose experiences reflect those of the people experiencing homelessness within the CoC. Each nomination and election cycle, the CoC Nominating Ad Hoc will utilize the most recently available data, including but not limited to HMIS, Point-in-Time (PIT) Count, and American Community Survey (ACS) data, to determine how to prioritize desired representation and expertise to ensure that the CoC Board membership background and experience recommendations align with current trends in who experiences homelessness in Orange County.
 - iv. People who are currently representing, in a professional capacity, the following and/or people with current or past personal experience with any of the below listed areas of representation:
 - 1. Veteran military service-focused agency (at least 1)
 - 2. Emergency Solutions Grant (ESG) Program funded agency or recipient agency (at least 1)
 - 3. Public Housing Agency (PHA) (at least 1)
 - 4. Domestic violence agency (at least 1)
 - 5. Education field / McKinney-Vento liaison (at least 1)
 - 6. Behavioral health field, which may include a Certified Community Behavioral Health Clinic (CCBHC) (at least 1)

Item 1. Attachment B

7. Health care field, which may include a Federally Qualified Health Center (FQHC), Healthcare for the Homeless, or other accessible primary care provider (at least 1)
8. TAY Agency (at least 1)
9. Family Agency (at least 1)
10. Business community, such as a member of a Business Improvement District
11. Law enforcement
12. Recovery Housing or Sober Living provider
13. Local workforce development organization, such as a member of the local Workforce Development Board, State Workforce Agencies, or American Job Centers
14. 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)
15. People with experience with the following parts of the system. Ideally, the CoC Board will include members who represent all parts of the system, but at minimum the CoC Board must include members who represent at least three (3) of the following:
 - a. Diversion
 - b. Street Outreach
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 - d. Emergency Shelter
 - e. Rapid Rehousing
 - f. Permanent Supportive Housing
 - g. Faith-based organization or community
 - h. Affordable housing development background

Date: July 14, 2026

Subject: Continuum of Care (CoC) Policy to Advance Recovery and Prohibit Illicit Drug Use

Recommended Action:

- a. Recommend the policy detailing how the Orange County CoC will advance recovery and prohibit illicit drug use, in response to the Fiscal Year (FY) 2026 CoC Program Notice of Funding Opportunity (NOFO), for review and approval by the CoC Board.

Background

The Fiscal Year (FY) 2026 Continuum of Care (CoC) Program Notice of Funding Opportunity (NOFO) emphasizes recovery, housing stability, self-sufficiency, and the appropriate use of CoC Program funds through the stated U.S. Department of Housing and Urban Development (HUD) goals and objectives.

On page 85 of the FY 2026 CoC Program NOFO, HUD indicated that CoC's may receive up to 10 points if the Collaborative Application "can describe the policy or state the CoC has in place to ensure that all housing projects submitted by the CoC will not operate drug injection sites or 'safe consumption sites,' knowingly distribute drug paraphernalia on or off property under their control, or conduct, permit, encourage, or allow any of these activities under the pretext of 'harm reduction.'"

Additionally, the FY 2026 CoC Program NOFO provides guidance indicating the needed components within the policy or statement to receive full points. "The policy or statement must:

1. Prohibit CoC-funded housing projects from operating drug injection sites or "safe consumption sites," knowingly distribute drug paraphernalia on or off property under their control, or conduct, permit, encourage, or allow any of these activities under the pretext of 'harm reduction;'"
2. Describe what remedies will be taken for CoC-funded housing projects determined by the CoC to be in violation of the above;
3. Encourage the provision of substance use disorder treatment and recovery housing within or outside of the CoC; and
4. Not restrict or prohibit CoC-funded housing projects that require program participants to be sober or to participate in treatment as a condition of assistance in accordance with 24 CFR 578."

As such, the Office of Care Coordination as the Collaborative Applicant for the Orange County CoC, has drafted a policy that advances recovery and prohibits illicit drug use in the CoC (Attachment A) for review and consideration. Approval of the recommended action will support the Orange County's ability to receive up to 10 points for the Collaborative Application through the FY2026 CoC Program NOFO, thus increasing its competitive score and likelihood of receiving funding for Tier 2 projects.

Attachments

Attachment A – Draft Advancing Recovery by Prohibiting Illicit Drug Enablement Policy

DRAFT Advancing Recovery by Prohibiting Illicit Drug Enablement Policy

Background

The Fiscal Year (FY) 2026 U.S. Department of Housing and Urban Development (HUD) Continuum of Care (CoC) Program Notice of Funding Opportunity (NOFO) emphasizes recovery, housing stability, self-sufficiency, and the appropriate use of CoC Program funds. This policy is intended to support implementation of those priorities while preserving participant rights and ensuring compliance with applicable federal laws and regulations.

Purpose

The Orange County CoC is committed to advancing housing stability, recovery, self-sufficiency, and sustained wellness for individuals and families experiencing homelessness through practices that are legally compliant, clinically informed, responsive to participant choice, and based on data-driven decision-making. Consistent with the HUD FY 2026 CoC Program NOFO and its recovery-oriented provisions, the Orange County CoC endorses recovery-oriented service models while ensuring that CoC Program funds are not used to facilitate, subsidize, or otherwise enable the unlawful use of controlled substances.

This policy establishes the Orange County CoC's standards for all CoC Program-funded housing projects.

Policy

The Orange County CoC prohibits all CoC Program-funded housing projects, whether operated directly by a recipient or through a subrecipient, from operating drug injection sites or "safe consumption sites," knowingly distributing drug paraphernalia on or off property under their control, knowingly permitting the use or distribution of illicit drugs on property under their control, or conducting, permitting, encouraging, or allowing any of these activities under the pretext of "harm reduction."

This prohibition is consistent with 21 U.S.C. 856(a)(1)-(2) and 21 U.S.C. 863, and it applies uniformly across CoC Program-funded permanent housing inventory, including Permanent Supportive Housing, Rapid Re-Housing, and Transitional Housing projects. This policy operates alongside, and does not substitute for, the affirmative certification each project applicant separately executes under NOFO Section V.A.4.a.(6).

The implementation of this policy does not change the expectations of the Orange County CoC related to the treatment of participants within these CoC-Program-funded housing projects. Participants shall be treated with dignity and respect, and services shall be delivered through trauma-informed, person-centered practices that account for individual circumstances, preserve legal protections, and respect participant autonomy.

Consistent with the FY 2026 CoC Program NOFO's language, none of the above requires a program-wide sobriety precondition for admission, mandatory treatment participation as a condition of assistance except where permitted by 24 CFR 578.75(h), or automatic termination of assistance for a first-time drug-related program or lease violation. CoC Program-funded housing projects retain discretion to respond to a first violation with graduated, trauma-informed engagement, and nothing in this policy precludes a project's use of harm reduction practices that fall outside the prohibited conduct described above, including low-

Item 2. Attachment A

barrier admission, non-punitive re-engagement following relapse, or staff access to overdose-reversal medication for emergency response.

The Orange CoC encourages CoC-funded housing projects and community partners to provide or connect participants to substance use disorder treatment, recovery supports, recovery housing, peer support, behavioral health services, detoxification, inpatient or outpatient treatment, medication-assisted treatment, and other clinically appropriate services within or outside the CoC geographic area. Connections to these services should occur within the CoC-funded inventory and through coordination with the Orange County Health Care Agency, CalOptima Health, and community-based treatment providers. The Orange County CoC will continue to prioritize referral pathways connecting program participants to voluntary treatment and recovery services within or outside the CoC geographic area.

Nothing in this policy shall be interpreted or implemented in a manner that discriminates against any individual or family on the basis of any protected characteristic under applicable federal, state, or local law.

Policy Violation

Where the Orange CoC determines that a funded project has violated this policy, the CoC will issue written notice of the finding to the Agency and require a corrective action plan within ninety (90) days. Available remedies include technical assistance, written assurances of future compliance, modification of project policies or practices, staff training, and enhanced monitoring, and, for continued or serious noncompliance, referral to the CoC Board's for discussion, referral to HUD as the funder and/or local law enforcement agency for enforcement action, reduction in the project's local competition score, or a recommendation to reduce or discontinue CoC Program funding in a subsequent competition, as permitted under CoC policy, HUD requirements, grant agreements, and applicable law.

Policy Review

Ongoing review ensures that this policy remains aligned with evolving program requirements, lawful recovery practices, civil rights obligations, participant protections, and any subsequent HUD guidance. The Orange County CoC Board shall review this policy at least annually and revise it as necessary to maintain consistency with HUD regulations, the CoC Program NOFO, and applicable federal, state, and local laws.