

# FY 2025 and 2026 CoC NOFO Update

Presentation to CoC Leadership Board  
March 19, 2026



Alameda County Health

# Update on FY 2025 Funding

- FY 2025 renewal application submitted to HUD on 2/5/2026.
- 2026 HUD Appropriations Bill enacted in Feb. 2026.
  - HUD to begin issuing grant agreements immediately for grants expiring in Q1 of 2026
  - By April 1 for grants expiring in Q2
  - By July 1 for grants expiring in Q3 and Q4
- To date, no FY 2025 grant agreements have been issued.

# Update on FY 2025 Funding

- Litigation re: FY 2025 NOFO is still ongoing.
- In early March, HUD moved to set aside the preliminary injunction, arguing that the 2026 Appropriations Bill only requires them to non-competitively renew grants expiring in Q1 and Q2 and indicating that they intend to competitively renew grants expiring in Q3 and Q4 by re-issuing the FY 2025 NOFO.
- The Judge denied this motion and HUD has appealed.
- There is no information yet on next steps on the appeal.

## Update on FY 2026 NOFO

- The Appropriations Bills requires HUD to issue the FY 2026 CoC NOFO no later than June 1, 2026 (about 2.5 months from now).
- There is not enough time for HUD to conduct a FY 2025 NOFO process for Q3 and Q4 grants and still issue the FY 2026 NOFO by June 1, 2026.
- However, it is still unclear whether they might try.

# Requirements for FY 2026 NOFO

The Appropriations Bills requires:

- NOFO must be issued by June 1, 2026
- Awards must be made by December 1, 2026
- Tier 1 must be at least 60% of ARD (it was 30% in the FY 2025 NOFO that HUD withdrew).

The bill does not preclude HUD from imposing a cap on Permanent Housing (PH)

# Planning for 2026 - Assumptions

- Release date in May 2026.
- Similar to FY 2025 NOFO released in December 2025
- 30% cap on Permanent Housing
- Policy priorities reversing Housing First and focusing instead on mandatory services, treatment and recovery.
- Timeline for responding anywhere from 30 to 90 days

# Impacts and Risks

- Many Permanent Supportive Housing (PSH) and Rapid Rehousing (RRH) grants will not fit under the PH cap.
- Alternative funding sources will be needed.
- Renewal applicants will have to agree to a range of new conditions (e.g. mandatory services).
- Opportunities to create new transitional housing and supportive services only programs (e.g. outreach, employment, case management).

# Getting Started with 2026 Planning - Committees

- Prior to 2025, the CoC Leadership Board and Strategy, Compliance and Funding Committee (SCF) seated a NOFO Committee made up of non-conflicted representatives.
- NOFO Committee responsible for developing the policies, scoring factors, and other rules for the local competition, and scoring proposals.
- In FY 2025, due to the short timeline and significant changes in the NOFO:
  - A small NOFO Response Team (NRT) was given responsibility for overall strategy, tracking the evolving situation with HUD and the lawsuits, and fast decision-making.
  - The NOFO committee was seated but mostly advisory, with a role in scoring only new projects (renewals would be scored by consultants based on objective factors only)

# Options for 2026

How best to structure the committees for 2026 depends on how much time we have to respond to the NOFO.

| NOFO Window | Committees and Roles  |
|-------------|---|
| 30 Days     | NOFO Response Team (NRT) only. In this scenario, the process will be incredibly compressed and the NRT will have to very quickly assess the NOFO and make fast decisions for the LB to approve. |
| 60 Days     | NRT responsible for overall strategy, competition policies and processes (including scoring factors). NOFO Committee serves in advisory role and also helps with scoring of new projects.       |
| 90 Days     | NRT provides overall strategy and guidance. NOFO Committee and NRT jointly develop/approve competition policies and processes. NOFO Committee scores renewals and new projects.                 |

# Advocacy

- The National Alliance to End Homelessness (NAEH) is coordinating advocacy efforts to ensure communities receive the funding they need to address homelessness and that CoC funding aligns with proven best practices.
- Go to: <https://endhomelessness.org/action> to sign up to receive advocacy alerts and other information on how you can be part of advocacy efforts.
- The Collaborative Applicant (H&H) is also participating in monthly NAEH advocacy cohort calls.

# DISCUSSION