

FY 2026 CoC NOFO Planning

Presentation to CoC Leadership Board
April 16, 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
- *On March 31, HUD announced awards of grants expiring in Q1*
- *On April 2, HUD released the 2026 CoC Registration Notice*

Update on FY 2025 Funding

- Litigation re: FY 2025 NOFO is still ongoing.
- In March, HUD moved to set aside the preliminary injunction.
- The Judge denied this motion and HUD has appealed.
- *The appeal was denied.*

Update on FY 2026 NOFO

- The Appropriations Bills requires HUD to issue the FY 2026 CoC NOFO no later than June 1, 2026
- HUD may still try to issue the 2025 NOFO to fund grants expiring in Q3 and Q4, but the timing seems very problematic.

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 or June 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.
- Allowable new project applications include Transitional Housing, Supportive Services Only.
- 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).

Current Grant Inventory (grants expiring in 2026)

Grant Type (Component)	Number of Grants	Renewal Amount (ARA)	% of ARA	Units	Beds
PSH (Permanent Supportive Housing)	25	\$38,378,945	64%	1,696	2,492
RRH (Rapid Rehousing)	7	\$7,509,870	13%	186	357
Joint TH-RRH	3	\$5,379,033	9%	212	308
TH (Transitional Housing)	2	\$1,179,573	2%	20	43
SSO - Support Services Only (Mobile Outreach & Navigation)	4	\$2,958,618	5%		
SSO - Coordinated Entry	4	\$2,838,675	5%		
HMIS	2	\$1,805,083	3%		
Total	47	\$60,049,797	100%	2,114	3,200

Impact of a Cap on Permanent Housing (PH)

- Our CoC receives about \$60 million in CoC funding, of which \$51 million funds Permanent Housing (PH).
 - Permanent Supportive Housing (PSH)
 - Rapid Rehousing (RRH)
 - Joint Transitional and Rapid Rehousing (TH-RRH)
- If PH is capped at 30% of the overall request, we will have to cut \$33 million in PH.
- PH can convert to transitional housing with service participation requirements and 24- month length of stay.

Impact of 60% Tier 1

- If Tier One is set at 60%, we can only protect \$36 million of our total \$60 million in existing funding
- If PH is capped at 30%, then there will be space in Tier 1 for all our non-PH renewals:
 - Transitional Housing (TH)
 - Supportive Services Only (SSO)
 - Coordinated Entry (CE) and HMIS

NOFO Decision-Making Structure

- 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.

Key Strategic Decisions for 2026

1. Criteria for identifying projects to fund with other resources
2. Prioritization criteria for remaining renewals (including balance of objective versus subjective factors; how to assess whether projects have complaints or investigations).
3. Whether and how to solicit applications for new projects
4. Application process and timeline
5. Strategies for responding to new HUD requirements (e.g. mandatory service participation, integrating law enforcement into encampment response, etc.)

Decisions Made by NRT in 2025

- To meet the 30% PH cap, identified a set of grants to shift to Measure W funding (mostly H&H grants).
- Recommended that TH-RRH projects transition to Transitional Housing (TH)
- Established priorities for project ranking:
 - First priority: renewing PSH and RRH (up to the 30% PH cap)
 - Second priority: renewing Transitional Housing (TH)
 - Third priority: renewing Supportive Services Only (SSO)
 - Fourth priority: new applications.
 - Coordinated Entry (CE) and HMIS placed at top of Tier 2

Decisions Made by NRT in 2025 (continued)

- Invited new applications for Transitional Housing and Supportive Services Only (SSO) projects.
 - H&H set up a Letter of Interest (LOI) process for organizations interested in partnering on a County-led application for TH or SSO.
- Created scoring system for renewals using only objective criteria (no scored narratives).
- Created streamlined application process for both new and renewal applications (reduced number of questions and attachments).
- Plan was that NRT and NOFO Committee would jointly work on scoring new applications; consultants/H&H staff would score renewals.

Update on H&H LOI

- The LOI link is still open, and H&H is receiving responses:
 - 21 submissions from 15 organizations
 - 16 for Supportive Services Only (SSO), 2 for Transitional Housing (TH), 3 for both
 - 13 are for countywide services, 3 for multiple jurisdictions, 5 for individual cities.
- Since there is no deadline, this process can be extended to encompass the 2026 NOFO.

Recommended Roles in 2026

Group	Role
Leadership Board	Approve overall strategic direction (as proposed by NRT); develop and disseminate communications to CoC members and broader community (in collaboration with NRT, H&H, Homebase), high-level problem solving.
NRT (or similar group)	Strategic decisions relating to funding priorities, scoring system, application process (similar scope as in 2025); maintain regular communication with LB leadership.
NOFO Committee	Review and score applications in collaboration with NRT.

Recommended Next Steps

- LB take action to continue the NRT or create a similar strategy and decision-making group, empowered to make the same types of decisions as the NRT made in 2025. (April meeting)
- NRT meets to start developing strategy (April/May)
- LB approve Strategic Direction for 2026 NOFO (May meeting)

Other Next Steps

The NOFO Consultant and H&H are starting with some preliminary steps:

- Complete HUD required registration in E-SNAPS (already done).
- Send update email to renewal applicants; begin pulling performance data.
- Send update to the broader community, including:
 - Information about what we expect in terms of allowable new projects
 - Suggestion to start thinking about new project applications
 - Link to H&H LOI process
- Begin work on the CoC Application (now called Merit Review) based on what was in the 2025 NOFO.

DISCUSSION