



**Special Meeting Agenda
Continuum of Care (CoC) Board
Tuesday, November 25, 2025, 10am-11am
Ventura County Community Foundation
Board Room
4001 Mission Oaks Blvd, Camarillo**

Zoom Meeting ID: 160 034 5884
<https://www.zoomgov.com/j/1600345884>

1. Call to Order
2. Board Comments
3. CoC Staff Comments
4. Public Comments: An opportunity for the public to participate in public meetings by addressing the Ventura County Continuum of Care Board in connection with one or more agenda or non-agenda items. Public comment is limited to 3 minutes per person during the opening part of the meeting and per item. The time allotment can be increased or decreased by the Chair depending on the number of speakers. This meeting is subject to the Brown Act and public comments may be submitted by using one of the following options:

Email in advance of the meeting: If you wish to make a written public comment, the comment must be submitted via email no later than 4:30pm on the day prior to the Board meeting. Send emails to: venturacoc@ventura.org Please indicate the agenda item you would like to speak on if relevant and whether you would like your message read by staff or if you will be participating in person.

During the meeting: Participants attending online may use the chat function in zoom to indicate they would like to make a comment. Participants attending in-person can complete a public comment card indicating which item they would like to comment on and submit to the Board Chair. Staff will call on participants during the public comment section of the meeting or during specific items following staff presentation of the item.

Continuum of Care Governance Board Business

5. Approval to Release a Notice of Funding Availability (NOFA) for New Project Applications, Renewals, Transition Grants, and Reallocations in the FY25 HUD Continuum of Care Competition; and Approval of the 2025 VC CoC Notice of Funding Opportunity (NOFO) Calendar (*Presenter: Jenn Harkey*)
6. Approval of the 2025 Ventura County Continuum of Care (VC CoC) Rank and Review Policy for the FY2025 Housing and Urban Development (HUD) Continuum of Care Funding Competition (*Presenter: Alicia Morales*)
7. Approval to Reschedule the December 2025 CoC Board Meeting (*Presenter: Jenn Harkey*)

November 25, 2025

VC CoC Governance Board

SUBJECT: Authorization to Release a Notice of Funding Availability (NOFA) for New Project Applications, Renewals, Transition Grants, and Reallocations in the FY25 HUD Continuum of Care Competition; and Approval of the 2025 VC CoC Notice of Funding Opportunity (NOFO) Calendar.

Discussion: The FY25 U.S. Housing and Urban Development (HUD) Continuum of Care Program Competition Notice of Funding Opportunity (NOFO) was released on November 13, 2025, with the collaborative application due January 14, 2025. Of the nationwide \$3.918 Billion available. Tier 1 is set at thirty percent (30%) of the CoC's Annual Renewal Demand (ARD), this means that approximately \$2.6 million in current funding is at risk. In addition, no more than thirty percent (30%) may fund Permanent Housing projects, including Permanent Supportive Housing (PSH) and Rapid Rehousing (RRH). Most of the current Permanent Housing projects will need to seek other funding. This NOFO is different than prior years by including eligible new project applications for Transitional Housing (TH) and Supportive Services Only (SSO) which includes street outreach. The CoC must review each project application submitted for inclusion on the FY25 CoC Priority Listing as part of the CoC Consolidated Application and either approve and rank, or reject project application submissions. The CoC Board will be required to review and approve the CoC Priority Listing in rank order for the final CoC Consolidated Application. Higher ranked projects will be assigned to Tier 1 and lower ranked projects will be assigned to Tier 2. CoCs will prioritize funding based on the ability to pass HUD threshold and merit requirements including project performance, local needs, and gaps.

HUD has made significant changes to the CoC program priorities and eligible funding for projects. The new FY25 federal policy priorities include the following:

NEW FY2025 POLICY PRIORITIES

Ending the crisis of homelessness on our streets	CoCs expected to 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 expected to prioritize projects that provide treatment and services needed to recover and regain self-sufficiency, including on-site treatment and participation requirements in services.
Advancing public safety	CoCs expected to cooperate with law enforcement to advance public safety. HUD cited the Supreme Court decision in <i>Grants Pass v. Johnson</i> as upholding the authority of local governments to prohibit public camping.
Promoting self-sufficiency	CoCs expected to 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 prioritize projects 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.

The CoC Consolidated Application includes the CoC narrative application, all CoC renewal project applications, any transition grants, and new CoC project applications. HUD will make reasonable cost of living adjustments for conditionally selected grants to renewal amounts to help afford increasing costs of operations due to inflation. The overview of merit review removes or significantly adjusts previous criteria. There will be a total of 130 points available in three rating areas: 1) Project capacity, review, and ranking (9 points), 2) System performance (40 points), and 3) CoC Coordinated and Engagement (81 points). Additional bonus 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 the SAVE program, which is an online service administered by U.S. Citizenship and Immigration Services (USCIS) that provides point in time immigration status for applicants seeking benefits. More details on new or updated HUD criteria are included here:

NEW OR UPDATED CRITERIA

- **Project Capacity, Review, and Ranking**
 - Supportive service participation requirements are considered a part of local ranking and review process
- **System Performance Measures**
 - Majority of points for reduction of homelessness, returns to homelessness, and jobs and income growth
 - Much higher expectations
- **CoC Coordination and Engagement**
 - High availability of treatment and recovery services
 - Service participation requirements demonstrated by supportive service agreements across CoC projects
 - 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
 - Protecting “public safety”—law enforcement and public safety protections

Source: National Alliance to End Homelessness Webinar 11.19.2025

One major shift from prior years is the supportive service participation requirements that must be included in the local ranking and review process. Service participation may be demonstrated by supportive service agreements across CoC projects. The availability of treatment and recovery services on-site must be available with 24/7 access to detox or inpatient treatment within the CoC geography. Formal partnerships with behavioral health clinics and recovery housing are preferred.

The estimated Annual Renewal Demand (ARD) funding for our Ventura County CoC is \$3,749,587. Tier 1 is limited to 30% of the ARD or \$1,124,876 which will need to include the Homeless Management Information System (HMIS) and Coordinated Entry System (CES) project at \$429,370 to meet our HUD requirement to maintain HMIS/CES. Based on these factors, the program funding available in Tier 1 (highest ranked projects) is \$695,506. All projects not in Tier 1 must compete for funding nationally. The HUD mandated 30% maximum for Permanent Housing projects (PSH and RRH) means that most current

CoC funded projects will not be part of the funding application to HUD. The VC CoC Planning grant funds are limited to \$321,110 and are not part of the previous calculations.

HUD requires all project applications to be submitted through e-snaps by **December 15, 2025**.

The rank and review process must be completed, and all project applicants notified by **December 30, 2025**.

The CoC Consolidated Application must then be submitted to HUD by **January 14, 2025**.

The proposed local FY25 CoC timeline (Exhibit A) is attached for CoC Board review and approval. Given this compressed schedule, it is likely necessary for the County to submit an application and subsequently identify subrecipients in order to prevent any loss of regional funding.

Additionally, the risk review section typically includes a review of past performance, financial controls, and audit results; however, HUD has included two new criteria in the risk review section: 1) other public sources such as newspapers, government accountability office reports or findings, or other complaints that have been proven to have merit, and 2) history of subsidizing or facilitating activities that conflict with the purposes of this NOFO. HUD has also included the following requirements for all applicants:

POST AWARD: OTHER COMPLIANCE PROVISIONS

- 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
 - Will not be used to 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.”

The National Alliance to End Homelessness (NAEH) has provided the attached (Exhibit B) guidance with the top NOFO changes, new policy priorities, project applicant expectations, merit review changes, and the HUD selection process details.

Recommendations:

- 1) Authorization for staff to release a Notice of Funding Availability (NOFA) for New Projects, Renewals, Transition Grants, Reallocations and DV Bonus Funding; and
- 2) Consider requiring all project applicants to comply with the SAVE program requirements; and
- 3) Approval of the 2025 VC CoC NOFO Calendar.



**Ventura County Continuum of Care (VC CoC)
2025 HUD NOFO Calendar**

DATE	RESPONSIBLE	ACTION
November 13, 2025	HUD	FY25 HUD CoC Notice of Funding Opportunity (NOFO) released to all Continuums of Care
November 25, 2025	VC CoC Board	CoC Board Approval to release Notice of Funding Availability (NOFA) for new and renewal applications
November 26, 2025	Collaborative Applicant	Release NOFA to seek applications for new projects, renewal projects, and reallocations (transition grants)
December 4, 2025	Collaborative Applicant / New & Renewal Applicants	NOFA Workshop & Technical Assistance for e-snaps
December 15, 2025	All Applicants	All new & renewal applications due in e-snaps to Collaborative Applicant
December 17, 2025	VC CoC Data & Evaluation Committee	Review and rank new, renewal, and reallocation projects; Provide recommendations for CoC Board to review and approve for the Consolidated Application
December 19, 2025	VC CoC Board	Approval of the ranking of projects to be included in Collaborative Application
December 30, 2025	Collaborative Applicant	Notify all respondents of funding recommendations & post CoC Priority Listing on CoC website
No Later than January 13, 2026	Collaborative Applicant	Post CoC Consolidated Application on www.venturacoc.org
No Later than January 14, 2026	Collaborative Applicant	Submit CoC Consolidated Application to HUD via e-snaps
May 1, 2026	HUD	Anticipated award date and estimated performance period start date



National Alliance to
END HOMELESSNESS

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

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:

- 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

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

- 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

- 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"

November 25, 2025

VC CoC Governance Board

SUBJECT: Approval of the 2025 Ventura County Continuum of Care (VC CoC) Rank and Review Policy for the FY2025 Housing and Urban Development (HUD) Continuum of Care Funding Competition

Background: The County Executive Office serves as the Ventura County Continuum of Care (VC CoC) Collaborative Applicant and facilitates the annual CoC funding competition. The FY25 HUD Continuum of Care Program Competition Notice of Funding Opportunity (NOFO) was released on November 13, 2025, with major changes from prior years. A shift in funding priorities from Permanent Housing projects to Transitional Housing and Supportive Services Only projects requires revisions to the scoring and ranking for all projects. The cap of thirty percent (30%) in Tier 1 and a cap of thirty percent (30%) overall for all permanent housing will reduce our CoCs number of Permanent Supportive Housing (PSH) and Rapid Rehousing (RRH) projects eligible for renewal. For the HUD CoC scoring factors, the new project quality criteria includes the following:

NEW PROJECT QUALITY THRESHOLD CRITERIA	
<i>Minimum score to be awarded. If awarded, must meet <u>all</u> of the criteria listed.</i>	
Project Type	Key Criteria
Transitional Housing (TH) Min: 7/10	<ul style="list-style-type: none"> Supportive services will be required for participation Applicant has experience operating a TH and will leverage other public/private sources Project will provide 40 hours of customized services (with some exceptions)
Supportive Services Only (SSO)-Standalone Min: 4/5	<ul style="list-style-type: none"> Project will leverage other public/private sources and provide services necessary to exit homelessness and increase self-sufficiency for program participants including those who do not traditionally engage
Supportive Services Only (SSO)-Street Outreach Min: 5/6	<ul style="list-style-type: none"> In addition to criteria for standalone SSO, applicant must have experience providing outreach services and demonstrate a history of partnering with first responders and law enforcement and will not interfere with enforcement of public camping and drug use laws
Supportive Services Only-Coordinated Entry (SSO-CE) Min. 3/4	<ul style="list-style-type: none"> Available and reachable for all in geographic area and a strategy for reaching households with highest needs Standardized assessment used to ensure participants directed to housing and services that meet their needs
Permanent Supportive Housing (PSH) Min: 4/6	<ul style="list-style-type: none"> Project will leverage other public/private sources to provide supportive services Will require participation in services Will be designed to serve elderly individuals or people with a physical disability or a developmental disability
Rapid Rehousing (RRH) Min: 6/8	<ul style="list-style-type: none"> Project will leverage other public/private sources to provide supportive services Will require participation in services Applicant has previously operated a project where employment incomes were improved
Homeless Management Information System (HMIS) Min: 3/5	<ul style="list-style-type: none"> Used as a proactive case management tool to promote treatment and recovery Collects all UDE and has the ability to unduplicate client records Produces all HUD reports
CoC Planning Min. 3/5	<ul style="list-style-type: none"> CoC membership is open and inclusive and there is a written governance charter in place CoC-wide planning committees Funds will be compliant with 24 CFR 578.7 and will improve CoCs ability to evaluate CoC and ESG projects

Discussion: VC CoC Staff have updated a draft of the Rank and Review Policy based on the FY25 HUD CoC NOFO. This draft (Exhibit A) includes local policy for ensuring the VC CoC consolidated application and project level applications are aligned and consistent with the federal priorities. The policy includes scoring templates for each project type as well as the process for ranking these projects in the HUD required tiering system. The revised FY25 Rank and Review Policy will be used by the VC CoC Data, Performance & Evaluation Committee to review and rank the renewals, new proposals, transition grant

applications, and any reallocations based on the scoring criteria. The VC CoC Data Committee will bring the recommended ranking of projects, including any proposed reallocations, to the VC CoC Board for review and approval in December 2025.

Recommendation: Approval of the FY25 Ventura County Continuum of Care Rank and Review Policy

**Ventura County Continuum of Care (VC CoC)
2025 Ranking and Selection Criteria
HUD Continuum of Care Program Competition**

The Ventura County Continuum of Care (VC CoC) will use the following process to rank all projects/applications in the 2025 HUD Continuum of Care Program Competition.

Section I: HUD CoC General Requirements and Policies

Section II: 2025 HUD CoC Notice of Funding Opportunity (NOFO) Detail

Section III: Ventura County CoC Policy on Reallocation, Project Ranking, and Tiers

Section IV: Process and Criteria for Rating and Ranking Renewal Projects

Section V: Process and Criteria for Ranking New Projects

Section VI: Final Project Priority Listing and Notification to Applicants

Section VII: Appeal Process

Section I: HUD CoC General Requirements and Policies

The U.S. Department of Housing and Urban Development (HUD) publishes the Notice of Funding Opportunity (NOFO) annually for the Continuum of Care (CoC) Program. The NOFO establishes the available level of funds, identifies HUD national priorities, and describes the criteria and data needed in the competitive application.

HUD requires CoCs to conduct a local review process and to designate a Collaborative Applicant to submit requests for funds in the CoC Competition. HUD provisionally awards funds to CoCs based on the scoring of a CoC system-level application up to a maximum allocation established by an area pro-rata need. The CoC conducts a local process to determine needs within the system and to evaluate and select and prioritize project level applications to include in the annual application for funds.

Section II: 2025 HUD CoC Notice of Funding Opportunity (NOFO) Detail

The FY 2025 Continuum of Care Competition NOFO was released on November 13, 2025 for the Continuum of Care (CoC) Program. Approximately \$3.918 billion is available for FY 2025. The VC CoC is eligible for an estimated \$3.75 million in annual renewal funding (ARD) and an estimated \$321,110 in planning grant funds with the potential to apply for new CoC bonus funding (\$1,284,442) and DV Bonus funding (\$642,221). HUD expects to make approximately 7,000 awards from the funds available under this NOFO. CoCs should direct resources towards outreach, intervention, and assistance that helps people regain self-sufficiency.

, HUD continues to require Collaborative Applicants to rank all projects in two tiers. Tier 1 is set at 30 percent of the CoC's Annual Renewal Demand (ARD) at \$1,124,876. In order to promote balance and increase competition, no more than 30 percent of a CoC's Annual Renewal Demand (ARD) under this NOFO will fund Permanent Housing projects, including PH-PSH, PH-RRH and Joint TH and PH-RRH projects. Additionally, there is an ongoing emphasis on project performance. 24 CFR Part 578.7 (6) requires CoCs to 'monitor recipient and subrecipient performance, evaluate outcomes, and take action against poor performers'. HUD encourages CoCs to reallocate under-performing projects to higher performing projects or to respond to community needs. The VC CoC responds to these factors by establishing policies, procedures, and criteria for reviewing and ranking each application for funding; for reallocation, and for selection of projects for inclusion in the CoC national competition. HUD also requires the CoC to meet requirements and guidelines specific to the annual NOFO.

Commented [AM1]: New: 30% ARD Tier 1 (\$1,124,876)

- A. Threshold/ Eligibility Review:** The CoC is required to review all applications to verify eligibility for federal CoC funding. Applicants must meet HUD thresholds regarding eligibility to do business with the federal government; legal status; commitment to participation in HMIS and the Coordinated Entry System (CES); and fiscal capacity. Projects from applicants not meeting these requirements are ineligible to apply for HUD CoC funding.
- B. Ranking Requirements:** The CoC must assign a unique rank to each project that it intends to submit to HUD for funding except for the CoC planning grant. Ranking of renewal projects must incorporate scoring on project performance, system performance and effectiveness. Each CoC must comprehensively review both new and renewal projects within its geographic area, using CoC-approved scoring criteria and selection priorities, to determine the extent to which each project is still necessary and addresses the listed policy priorities. Funds for projects that are determined to be underperforming, obsolete, or ineffective should be reallocated to new projects that are based on proven or promising models.

C. Renewals: Renewal Applications (projects funded in FY 24): Providers may submit renewals for permanent housing. However, awards will be significantly limited compared to prior years.
o It is strongly advised that providers with PSH, RRH, and Joint TH-RRH consider submitting additional, new project applications for Transitional Housing or Supportive Services Only project types.

o Renewal PSH projects will be prioritized at the 30% cap and RRH, TH-RRH are very unlikely to receive funding.

Commented [AM2]: New: 30% cap for all PH activities

D. Transition Grants To create a Transition Grant, the CoC must wholly eliminate one or more projects and use those funds to create the single, new transition grant [see section IV.D.1.I of this NOFO].

Commented [AM3]: New: Opportunity to transition activity types to new projects to preserve CoC's ARD (e.g.: Transition PSH to SSO or TH)

CoC's may submit Transition Grants for the following:

o Transition Grant: A Transition grant is an application to fund a new CoC project through the reallocation process to transition an eligible CoC renewal project (including a Special NOFO project or DV Renewal project) from one program component to another eligible component over a 1-year period.

E. Reallocation & Bonus: CoCs may use funds from part or whole existing grants to create new projects through reallocation or bonus funding. Reallocation is a process CoCs use to shift funds in whole or in part from existing eligible CoC renewal projects to create one or more new projects without decreasing the CoC's ARD. CoCs may only reallocate eligible renewal projects so long as the renewal project being reduced or eliminated has a current grant agreement with an expiration date in CY 2026. **Bonus projects are typically awarded competitively at the national level but are also required to be ranked with the CoC's other renewal and new projects** established by HUD in sections V.A.4.a and V.A.4.b of this NOFO.

CoCs may submit new project applications under the bonus process or reallocation process for the following project types:

- (1) SSO projects (Street outreach, Coordinated Entry System, Supportive Services).
- (2) TH projects.
- (3) PH-PSH projects.
- (4) PH-RRH projects
- (5) Dedicated HMIS

Commented [AM4]: New: Eligible activities

F. Domestic Violence, Dating Violence, Sexual Assault, and Stalking Renewal Projects (DV Renewal Projects). Are eligible renewal projects that were previously funded, in whole or in part, with DV Bonus funding or were at some point expanded using DV Bonus funding to continue serving individuals and families who are fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking and who qualify under paragraphs (1) or (4) of the definition of homelessness at 24 CFR 578.3 or section 103(b) of the McKinney-Vento Homeless Assistance Act.

Domestic Violence, Dating Violence, Sexual Assault, and Stalking New Projects (DV Bonus and DV Reallocation Projects). A new project that is dedicated to serving individuals and families who are fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking and who qualify under the paragraphs (1) or (4) of the definition of homeless at 24 CFR 578.3 or section 103(b) of the McKinney-Vento Homeless Assistance Act. As described in section 2.b.(5) of the Appendix, survivors of human trafficking may also qualify as homeless under paragraph (4) of the homeless definition at 24 CFR 578.3 or section 103(b) of the

McKinney-Vento Homeless Assistance Act because they are often also victims of domestic violence, dating violence, sexual assault, or stalking, however a DV Bonus project may not exclusively serve people fleeing or attempting to flee human trafficking. CoCs may submit new project applications under the DV bonus process or DV reallocation process for the following project types:

- (1) SSO projects (Coordinated Entry System)
- (2) TH projects.
- (3) PH-RRH Projects

G. Tiers & Priority Order:

In the FY25 CoC Program Competition, Tier 1 is equal to 30 percent (\$1,124,876) of the CoC's Annual Renewal Demand (ARD). HUD will conditionally select project applications in Tier 1 from the highest scoring CoC application to the lowest scoring CoC application and according to the rank assigned by the CoC on the CoC Priority listing, provided the project applications pass both project eligibility and project quality threshold review, merit review, risk review and if applicable, project renewal threshold.

▪ Any competitively ranked project may be placed in Tier 1 according to the CoC's local rating and ranking process and based on local needs and priorities

Commented [AM5]: New: Tier 1 30% ARD (\$1,124,876) w/ 30% cap on PH

Tier 2 is equal to 70 percent of the CoC's Annual Renewal Demand (ARD). HUD will evaluate project applications placed in Tier 2 for project eligibility and project quality threshold requirements and project renewal threshold requirements, if applicable; and HUD will determine funding using the CoC Application score as well as the CoC project ranking. Tier 1 will equal 90% of the CoC's ARD. Projects in Tier 2 are evaluated on a project by project level across the CoCs nationally. As a result, selection for funding of projects in Tier 2 is more rigorous than in Tier 1.

Commented [AM6]: New: 70% ARD (\$2,624,711) at risk

H. CoCs should consider the policy priorities established in the NOFO in conjunction with local priorities to determine the ranking of new projects created through reallocation, CoC planning, and renewal project requests.

HUD CoC FY25 Policy and Program Priorities

Commented [AM7]: NEW: HUD Priorities

- 1) End the crisis of homelessness on our streets – and direct resources towards outreach, intervention, and assistance that helps people regain self-sufficiency.
- 2) Prioritize Treatment and Recovery – to provide the treatment and services people need to recover and regain self-sufficiency including on-site behavioral health treatment, robust wraparound supportive services, and participation requirements.
- 3) Advance Public Safety – to work with First Responders as critical partners in engaging people into treatment and services and protecting vulnerable individuals experiencing homelessness.
- 4) Promote Self-Sufficiency – with projects that help lead to long-term economic independence for individuals and families to exit homelessness and prevent future returns to homelessness.
- 5) Improve Outcomes - to determine their effectiveness in reducing homelessness and increasing self-sufficiency.

- 6) Minimize Trauma- to encourage providers to provide trauma informed care and ensure participant safety in programs, especially for youth and survivors of domestic violence, dating violence, sexual assault, and stalking.

Ventura County Policy on Project Ranking and Tiering

(adopted and finalized on XXXX, 2025 by VC CoC Board)

Section III: Ventura County Policy on Reallocation, Project Ranking and Tiering

A. Policy Objectives:

In developing our local policy governing project ranking, reallocation and tiering, Ventura County CoC's objectives are to align with the VC CoC mission, values and guiding principles:

- **Mission Statement:** The VC CoC Alliance is a collaborative group dedicated to promoting a safe, desirable and thriving community by ending homelessness in Ventura County.
- **Vision:** Homelessness is rare, brief and non-recurring
- **Values:** We value the dignity of every human life, the well-being of the community and the power of the community to working together to solve community problems.
- **Guiding Principles:**
 - Collective Impact
 - Strengths-Based and Trauma-Informed Care
- **Comply with HUD requirements.**
 - Ending the Crisis of Homelessness on Our Streets
 - Prioritizing Treatment and Recovery
 - Advancing Public Safety
 - Promoting Self-Sufficiency
 - Improving Outcomes
 - Minimizing Trauma
- Preserve funding for high performing and effective projects.
- Fund programs that contribute positively to overall system performance.
- Shift investments from lower performing projects and ones which are at risk of losing HUD funding to new projects that help advance our community's goal of reducing homelessness and demonstrate effective approaches and best practices.

Commented [AM8]: New: HUD requirements

Rationale for Preliminary Rankings

- Closely followed HUD's priorities and guidelines for ranking projects.
- Positive contribution to System Level Performance will be heavily weighted when ranking projects including exits to permanent housing and housing retention.
- Examine under-performing projects and under-utilized projects and consider reallocation.

- Projects/agencies engagement in Continuum of Care efforts and participation in Coordinated Entry will be weighted when ranking projects.
- Projects that serve chronically homeless (CH) are ranked higher on the list than programs without dedicated CH beds. Programs that target chronically homeless for non-dedicated beds as they became available are ranked higher on the list.
- Cost efficiency and utilization will be considered when ranking projects within the project component

B. Project Review and Ranking Policy:

The Ventura County CoC will invite submissions for new and renewal projects and will conduct a review and ranking following the procedures stated in Sections VI.

i. CoC Renewal/Reallocation Projects

- renewal PH
- renewal Safe Haven
- renewal DV
- renewal HMIS

ii. Transition Projects

- TH
- SSO

iii. New Projects:

- TH
- TH/RRH
- SSO

ii. DV Bonus Projects;

iii. DV Reallocation Projects;

Within each type, projects will be scored using a score system specific to that program type and placed within their ranked order, with renewal PSH in the first group (ordered by score). Renewal projects scoring less than 80 points will be considered for reallocation or elimination. If CoC decides to rank and submit a project scoring below 80 points, it may be ranked in Tier 2. The CoC goal is to preserve funding for the entire community and will make ranking decisions to submit a competitive application and not put community-wide funding at risk.

Commented [AM9]: New: Threshold increased to align with new scoring criteria and competitiveness at the national level.

C. Tiering Policy:

Once the rank order of projects has been determined the projects at the bottom of the list will fall into Tier 2 (70% of ARD).

Projects Straddling Tiers. If a project application straddles the Tier 1 and Tier 2 funding line, HUD will conditionally select the project up to the amount of funding that falls within Tier 1. Using selection criteria in section V.D.3.b above, HUD may fund the Tier 2 portion of the project. If HUD does not fund the Tier 2 portion of the project, HUD may award the project at the reduced amount based on the amount of funding that falls within Tier 1, provided the project is still feasible with the reduced funding (e.g., is able to continue serving homeless program participants effectively).

As HMIS and Coordinated Entry are HUD mandated requirements in order to receive Continuum of Care funding, HUD strongly recommends that these projects remain top priorities in Tier 1 in order to secure and maintain funding for this required activity.

The CoC Planning Grant is not ranked per HUD's guidance.

Section IV: Process for Rating and Ranking Renewal Projects

A: Rating and Ranking Process:

All applications are due in e-snaps by December 15, 2025.

All renewal projects will be ranked using an objective scoring system approved by the VC CoC Board. VC CoC Staff will use data provided through the application process to calculate a score for each renewal and use the results to develop the Project Priority Listing for review and approval by the VC CoC Board as recommended through the VC CoC Data and Performance Committee.

The application process is intended to assess agency's capacity to administer CoC projects while complying with HUD requirements. Additionally, the application helps staff and the CoC Committees review the following:

Cost effectiveness

2. Leveraging mainstream programs (e.g. Medicaid and SSI)

3. System Performance Data (project contribution) 4. Annual Performance Report (APR) returns to homelessness performance measure, employment income performance measure, supportive services participation requirements 5. Type of Population served

6. Projects require program participants to take part in supportive services (e.g. case management, employment training, substance use disorder treatment) in line with 24 CFR 578.75(h) by attaching supportive service agreements (contract, occupancy agreement, lease, or equivalent) 7. Verification of Immigration Status Participation

8. Substance Use treatment availability

9. Financial commitment (25% match) 10. CoC participation/VC CoC Partner Agency Memorandum of Understanding (MOU)

Commented [AM10]: New: Requirements 6 and 7, if awarded must comply.

VC CoC Staff and VC CoC Data and Performance Committee use data provided through the application process, HMIS reports (Annual Performance Reports and CoC System Performance Data) analysis to develop the Project Priority Listing for review and approval by the VC CoC Board. This process is conducted in open public meetings and all materials are posted on the VC CoC website: www.venturacoc.org

B. Scoring Criteria for Renewal Permanent Housing (PSH and RRH):

The scoring system will have a maximum of 110 points with points for project, supportive service requirements, the availability of treatment and recovery services and system performance and threshold factors. Permanent Supportive Housing projects must be designed to serve elderly individuals and/ or individuals with physical disability/impairment (not including substance use disorder) and require participation in supportive services. 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. Data to assess both performance and threshold criteria will be obtained from the information submitted by the applicants in their LOI response. System Performance Data will be pulled from HMIS; however, victim service providers must submit data generated from a comparable database for review.

Commented [AM11]: New: Increased due to new requirements, 30% ARD and PH cap and national competitiveness.

The performance measures will be based on those established by HUD, VC CoC local performance targets and tracked through HMIS data:

- at least 85 percent of project participants either remained in permanent housing or exited to another permanent housing location.
- at least 55 percent of project participant increased their income from sources other than employment in an operating year.
- at least 90 percent of project participants obtained mainstream benefits

Some renewing projects will not have a full year of performance data to be considered in the review and rank process because they have not yet been operational for a full year. These projects will be reviewed on the data they have available but will not be penalized for not serving the full number of participants. If a new project does not have enough performance data to review, they will be reviewed for administrative and program compliance and be ranked at the bottom of Tier 1. Their overall score will place them in the bottom of the group of PSH and RRH renewals but they will be placed in Tier 1 because PH renewals as a group will be the first on the Project Priority List. If a project is poorly performing and lacks capacity, the committee may recommend the project for reallocation.

C. Scoring Criteria for Renewal Safe Haven:

The scoring system will have a maximum of 110 points with points for project and system performance, supportive service requirements, the availability of treatment and recovery services and threshold factors. Data to assess both performance and threshold criteria will be obtained from the information submitted by the applicants in their application. System Performance Data will be pulled from HMIS.

The performance measures will be based on those established by HUD, VC CoC local performance targets and tracked through HMIS data:

- at least 80 percent of project participants either exit to permanent housing, or a temporary placement progressing towards permanent housing.
- at least 55 percent of project participant increased their total income in an operating year.
- at least 90 percent of project participants obtained mainstream benefits, as eligible

Scoring Criteria for New Projects:

The scoring team will have a maximum of 110 points with points for projects, system performance, supportive service requirements, the availability of treatment services and threshold factors.

The performance measures will be based on those established by HUD, VC CoC local performance targets and tracked through HMIS data:

- at least 80 percent of project participants either exit to permanent housing, or a temporary placement progressing towards permanent housing.
- at least 55 percent of project participant increased their total income in an operating year.
- at least 90 percent of project participants obtained mainstream benefits, as eligible

D. HMIS Renewal:

Consistent with previous CoC applications, HMIS renewals will be assessed for performance and spending in alignment with HUD requirements. As noted in Section II, the HMIS renewal may be placed in Tier 1.

Section V: Process and Criteria for Ranking New Projects

The VC CoC Board will examine recommendations from the VC CoC Data and Performance Committee and VC CoC staff to determine the amount of funding available for reallocation. New CoC bonus funds and any reallocated funds will be awarded through a Request for Proposal (RFP) process for open competition for projects that provide Permanent Supportive Housing (PSH), Joint Transitional Housing Rapid Re-housing or dedicated HMIS projects to be carried out by the HMIS lead.

An additional RFP process will be held for VC CoC Domestic Violence Bonus funding. This funding is eligible for the following project types that serve individuals and families experiencing trauma or a lack of safety related to fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking, or: 1) PH-RRH; 2) TH-RRH; 3) CE-SSO. Applications will be scored the same as other new projects with additional points for projects that have a plan for promoting safety for the population served. Victim Service Provider applicants will provide data from a comparable database to demonstrate need, capacity and performance.

The RFP will be structured to award funds to projects that 1) meet Ventura County's CoC priorities; and 2) are most competitive in evaluating project capacity and past performance. In addition, projects must meet HUD's threshold and quality requirements. The RFP will require applicants to submit project narrative, applicant capacity and financial information sufficient to assess all of these factors. To evaluate whether projects meet the HUD threshold, quality standards, and performance standards, the projects will be reviewed by the VC CoC Data and Performance Committee.

To evaluate project quality and fit with Ventura County objectives and develop a ranked order, the CoC will convene an unbiased project review meeting to review each new project. Projects will be scored based on a 110 point system (Attachment A-D). The VC CoC Staff will then hold one meeting to review and score applications and arrive at a proposed final ranking for new projects, including a recommendation of which project should be

submitted as the bonus. The panel may also recommend that projects should either increase or decrease their funding request to maximize the use of available reallocated or bonus funds.

The final ranking of new projects as determined will be discussed and approved by the VC CoC Board on December 19, 2025 to determine the order on the Project Priority Listing.

Section VI: Final Project Priority List and Notification to Applicants

Once the rating and ranking processes for new and renewal applicants are complete, VC CoC staff will integrate the results of the scoring/ranking processes and create the final proposed Project Priority Listing for review by the VC CoC Board. This proposed list can include recommendations to adjust the placement of projects in Tier 2 in order to maximize the total funding award for Ventura County. The proposed final list will be approved, and notice sent to the applicants of the final results no later than December 19, 2025.

Section VII: Appeal Process

Applicants may appeal any of the following decisions of the VC CoC:

- 1) Placement of project into Tier 2
- 2) Reduction in funding
- 3) Project not included in final FY25 VC CoC consolidated application.

Appeals must be submitted to the Ventura County Collaborative Applicant no later than December 20, 2025. Appeals will be heard by the VC Data, Performance & Evaluation Committee. The decision of the appeal panel will be submitted to the VC CoC Board to make a final determination.

Attachment A

Permanent Supportive Housing (PSH) and Rapid Re-Housing (RRH) Performance Measures - Max. 110 Points with 40 points towards System Performance detailed below.

- at least 85 percent of project participants either remained in permanent housing or exited to another PH (up to 10 points)
- at least 55 percent of project participants increased their total income in a given operating year (up to 10 points).
- Demonstrate quickly moving persons into permanent housing from program entry to housing moving in date with goal of fewer than 30 days from program entry to move in (up to 10 points).
- fewer than 5% returns to homelessness within a year of exiting from PH/RRH program (up to 10 points).

Projects can receive an additional 10 points for maximizing utilization of their program vacancies with an average of no less than 95% utilization in the previous 4 quarters. HMIS Data Quality should reflect no more than 10% of any missing data element, as indicated in the chart below.

Underperforming projects will be discussed in detail with VC CoC Data and Performance Committee and recommendations will be made for reallocation to the VC CoC Board when appropriate.

Permanent Housing (PSH/RRH) Projects: **Applicant:** _____ **Project:** _____

(PENDING Team APPROVAL)- will add once approved- review in folder

Attachment B

The following will be applied for the performance measures scored for Safe Haven (SH) Projects renewals.
SH Performance Measures - Max. 110 Points with 40 points towards System Performance

- at least 80 percent of project participants exit to a permanent housing or other positive destination (up to 10 points).
- at least 55 percent of project participants increased their total income in a given operating year (up to 5 points).
- at least 90 percent of project participants obtained or maintained mainstream benefits (up to 5 points).
- fewer than 5% returns to homelessness within a year of exiting from SH program (up to 10 points).
- Average length of stay <180 days (up to 10 points)

Projects can receive an additional 10 points for maximizing utilization of their program vacancies with an average of no less than 95% utilization in the previous 4 quarters. HMIS Data Quality should reflect no more than 10% of any missing data element.

Underperforming projects will be discussed in detail with VC CoC Data and Performance Committee and recommendations will be made for reallocation to the VC CoC Board when appropriate.

Safe Haven (SH) Projects: Applicant: _____ Project: _____

(PENDING Team APPROVAL)- will add once approved- review in folder

Attachment C

The following will be applied for the performance measures scored for Transitional Housing (TH). Performance Measures - Max. 110 Points with 40 points towards System Performance

- at least 80 percent of project participants exit to a permanent housing or other positive destination (up to 10 points).
- at least 55 percent of project participants increased their total income in a given operating year (up to 5 points).
- at least 90 percent of project participants obtained or maintained mainstream benefits (up to 5 points).
- fewer than 5% returns to homelessness within a year of exiting from SH program (up to 10 points).
- Average length of stay <180 days (up to 10 points)

Projects can receive an additional 5 points for maximizing utilization of their program vacancies with an average of no less than 95% utilization in the previous 4 quarters. HMIS Data Quality should reflect no more than 10% of any missing data element. Projects Transitioning from PSH to TH can receive an additional 5 points.

Commented [AM12]: New: Bonus points allocated to support PSH projects at risk and to preserve CoC ARD.

Underperforming projects will be discussed in detail with VC CoC Data and Performance Committee and recommendations will be made for reallocation to the VC CoC Board when appropriate.

(New, Renewal and Transition Projects)

Transitional Housing (TH) Projects: Applicant: _____ Project: _____

(PENDING Team APPROVAL)- will add once approved- review in folder

Attachment D

Supportive Services Only (SSO) Street Outreach, (SSO) Standalone Projects AND (SSO) Coordinated Entry System:

The following will be applied for the performance measures scored for Supportive Services Only (Street Outreach). Performance Measures - Max. 110 Points with 40 points towards System Performance

< fewer than 5% returns to homelessness within a year of exiting from SH program (up to **10 points**),

Length of time Homeless, 180 days or less on average (up to **10 points**),

at least 90 percent of project participants obtained or maintained mainstream benefits (up to **5 points**)

at least 55 percent of project participants increased their total income in a given operating year (up to **5 points**)

at least 80 percent of project participants exit to a permanent housing or other positive destination (up to **10 points**).

Applicant: _____ **Project:** _____

(PENDING Team APPROVAL)- will add once approved- review in folder

DRAFT

November 25, 2025

VC CoC Governance Board

SUBJECT: Approval to Reschedule the December 2025 CoC Board Meeting

Due to the FY25 HUD Continuum of Care (CoC) Notice of Funding Opportunity (NOFO) timeline, the December 2025 VC CoC Board meeting needs to be scheduled following the local project application deadline of December 15th and following the CoC Data Committee review and ranking recommendations meeting on December 17th. VC CoC Staff have proposed to reschedule from December 10th to December 19th for the final review and approval of project ranking to be posted and notify applicants by the HUD deadline of December 30th. All projects approved by the CoC Board will be included in the final HUD CoC Consolidated Application to be submitted by January 14, 2026.

RECOMMENDATION: Approve to reschedule the December 2025 CoC Board meeting to December 19, 2025 from 10:00am to 11:30am.