

North Carolina Balance of State Continuum of Care

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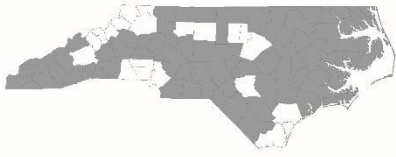
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NC Balance of State CoC Steering Committee Consent Agenda and Updates

October 7, 2025

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Section I. NC BoS CoC Steering Committee Consent Agenda

The following will be voted on at the September 9, 2025, NC BoS CoC Steering Committee meeting:

September 9, 2025, Steering Committee Minutes

<https://ncceh.org/wp-content/uploads/2025/09/September-2025-SC-Minutes.pdf>

**Any Steering Committee member may request to move an item off the consent agenda to be more thoroughly considered. Any such items will be discussed as a regular agenda item at the next Steering Committee meeting.*



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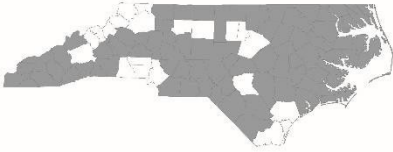
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Section II. Updates

- **Veterans Subcommittee**
Monday, October 6, 11:00 A.M. – 12:00 P.M.
Join Zoom Meeting
Meeting ID: 837 9246 1651
- **Lived Expertise Advisory Council**
Friday, October 10, 12:00 – 1:00 P.M.
[Join Zoom Meeting](#)
Meeting ID: 579 903 9481
Passcode: qYqVY5
- **Client Advocacy Collaborative**
Wednesday, October 15, 11:30 – 12:30 P.M.
[Join Zoom Meeting](#)
Meeting ID: 837 9246 1651
- **Funding and Performance Subcommittee**
Thursday, October 16, 2:00 – 3:00 P.M.
[Join Zoom Meeting](#)
Meeting ID: 844 1727 9794
Passcode: 908847
- **Coordinated Entry Council**
Monday, October 20, 10 – 11:30 A.M.
Join Zoom Meeting
Meeting ID: 8978 8280 4661
Passcode: 490790



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Section III. Meeting Minutes and Supporting Materials

LEAC Meeting – 9/12/25

Attendance: Karen C., Melissa H., Von N., Elliot R (staff), Teresa (staff) and Mira S. (staff)

Three draft documents were sent out prior to the LEAC meeting for LEAC members to review and provide their feedback.

Discussion on SOP Documents

- **Compensation Document**

- Melissa said she did not understand the compensation draft and felt it sounded like LEAC members were being offered jobs.
- Elliot explained that staff has been working with NCCEH leadership over the past month to clarify how the compensation procedure should be handled.
- He emphasized that the intent is not to create a situation where LEAC members receive too much compensation, which could interfere with eligibility for government benefits.
- Karen noted she doesn't fully understand how much income would affect her benefits and suggested that might be a conversation for a caseworker. She added she is supportive of working more as long as it does not negatively impact her benefits.

- **Roles & Responsibilities Document**

- Melissa said she liked this document and felt it provides clear direction, especially for new members (she mentioned her son as an example).
- Teresa explained the documents were designed to start conversation rather than serve as finalized policies.
- Von said she "loved" the documents but asked if the tiers are connected to roles. Teresa confirmed that:
- Tier 1 represents the highest level of engagement and could indicate interest in a job opportunity.
- Von commented that the tier structure felt a little unusual.
- Karen suggested presenting an overview before introducing the tier system, as the tiers might feel overwhelming at first glance.
- Elliot raised the concern that if suddenly more people became available, it might create an imbalance with those who have been consistently engaged.
- Members agreed that requirements should be attached to each tier (e.g., participation expectations).
- Melissa suggested adding a probationary period for new members.
- Karen recommended a large calendar for members to indicate availability.
- Von asked if members would receive training as part of the process.

- **Membership & Participation Concerns**

- Melissa noted that many people join but then stop attending without explanation. She recommended establishing a meeting attendance requirement to ensure commitment.
- Karen supported being direct about expectations for participation.

- **Other Questions & Suggestions**

- Von asked who would have access to budget information.
- Members discussed the need for time-tracking and money-tracking software to support transparency.

Top 5 Suggestions to Approach PIT/HIC Discussion

- Karen suggested:
 - Dealing with families under the age of three, connecting them to early intervention services.
 - If someone receives SNAP benefits, have you informed your case worker that you are already homeless?
- Melissa suggests maybe creating handouts with additional resources.

Client Advocacy Collaborative

Wednesday, September 17, 2025, at 11:30 AM

Member Attendance: Tradell Adkins, Tambra Chamberlain, Lesly Delgado, Melissa Hewitt, Bonnie Harper

NCCEH Staff Attendance: Teresa Robinson, Joanne Cain, Mira Sanderson

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Client Advocacy Collaborative SharePoint Page

Teresa shared the new Client Advocacy Collaborative SharePoint page: [link](#).

Subcommittee members should already have access to the page. If you do not, please reach out to Teresa at teresa.robinson@ncceh.org.

She also shared that the subcommittee is working on creating a Standard Operating Procedure (SOP). A few members have already volunteered to assist, but anyone interested is welcome to provide input.

Teresa noted that she and Tradell will be meeting with Tradell's Feeding America contacts to learn more about their Standard Operating Procedures (SOPs) and explore what elements can be adapted for the Collaborative's own SOP.

Tambra raised a question about the use of the term "*client*." Bonnie explained that at Partners Health, they use "*participant*" instead. Joanne added that when she worked at the Arc, they also avoided the term "*client*," noting that "*client*" implies someone who has chosen to seek a service, whereas individuals experiencing homelessness have not chosen their circumstances. Bonnie agreed and noted that this reasoning was likely behind Partners Health's decision to change their terminology.

Dialogue and Newsletter

Teresa shared that the Client Advocacy Collaborative will be partnering with NCCEH's newsletter (which currently has over 700 subscribers) to include subcommittee content such as local resources, personal statements, federal updates, advocacy opportunities, and more. The newsletter will be distributed on the third Friday of each month, with the first issue scheduled for October.

Teresa asked if anyone had a story—either professional or related to client experiences—that they would be willing to share. Tambra volunteered, and Bonnie Harper asked whether Teresa was looking for *success stories* or *journeys*. Teresa clarified that she is seeking journeys, explaining that her goal is to compile these narratives and share them with representatives to demonstrate the importance of funding various resources. These are the stories policymakers

may not hear otherwise, but they are central to the work being done every day. Teresa emphasized that such narratives are essential to conveying the true impact of the subcommittee's efforts.

She requested that members send her any stories, contact information, or ideas over the next month (before the next meeting).

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Our next Client Advocacy Collaborative Meeting will be on October 15, 2025, at 11:30 AM.

Funding and Performance Subcommittee

Thursday, September 18, 2025, at 2 PM

Member Attendance: Amy Modlin, Lynne James, Melissa McKeown, Sarah Lancaster, Talaika Williams, Melissa Hewitt

NCCEH Staff Attendance: Jenny Simmons, Joanne Cain, Dashia Shanks, Mia Phillips, Andrea Carey, Mira Sanderson

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Review of CY2026 ESG Program Competition in the NC BoS CoC

CY2026 ESG Competition Timeline

Activity	Due Date
RFA Released by NC DHHS, NC ESG Office	Tuesday, June 10, 2025
NC BoS CoC Instructions Released	5 PM on Wednesday June 11, 2025
NC ESG Office RFA webinar	June 13, 16, 18
NC BoS CoC Webinar for all applicants	June 18, 2025, at 1 PM
Project Apps due to NCCEH	By 12 PM (Noon) on Tuesday, July 15, 2025
Project Apps Review	July 16 – 29, 2025
Regional Review Forms Due	By 12 PM (Noon) on Friday, July 25, 2025
Project Review Committee Selection Meeting	August 1, 2025, at 10 AM
Steering Committee Meeting	August 5, 2025, at 10:30 AM
Appeals Due – 2 submissions received	By 12 PM (Noon) on Friday, August 8, 2025
Project Review Committee Appeals Meeting – both appeals deemed ineligible	August 11, 2025, at 2 PM
Steering Committee Appeals Meeting	August 12, 2025, at 10:30 AM
Project & Regional Applications Due to NC DHHS	By 5 PM on Monday, August 25, 2025



CY2026 ESG Program Competition Application Materials

Returning Project Applicants

- NC ESG Application
- Budget Form
- Project Policies and Procedures
- Supplemental Information Form
- Non-Profit Board of Directors list
- Annual Performance Review

New Project Applicants

- NC ESG Application
- Budget Form
- Project Policies and Procedures
- Supplemental Information Form
- Non-Profit Board of Directors List
- Annual Performance Report (if currently operating a project type)
- Operating Budget
- Organizational Chart

CY2026 ESG Program Competition Application Materials Errors

Application Deadline

- Returning Agencies missing Original Deadline = 19%

Full Fair Share not applied for by Deadline

- 8 out of 13 Regions = 62%

Budget Form Missing Agency Name

- 12 out of 39 agencies = 31% error rates

APR Issues

- 18 out of 31 returning agencies had issues with their APRs = 58% error rate
 - Wrong Dates – 6%
 - CAPER instead of APR – 19%
 - APR incorrect format – 10%
 - Missing APR altogether -23%

Supplemental Information Form

- Missing Form: 21%

Questions from Applicants regarding additional requirements beyond HUD requirements for ESG

Equity Section of the Supplemental Information Form

- Individuals who are Black, Indigenous, or People of Color (BIPOC) comprise at least 20% of the applicant's Board of Directors. (Benchmark set at 20%)
- At least 20% of the applicants' Board of Directors have experienced homelessness. (Benchmark set at 20%.)
- At least 20% of the applicant's managers or director-level positions are filled by BIPOC. Position descriptions must include supervising other staff, payroll, or HR duties. (Benchmark set at 20%.)
- At least 10% of the project's staff involved in operating or administering ESG Program-eligible activities have experienced homelessness in their lifetime.
- At least 10% of adults increased their earned cash income. (Benchmark set at 10%.)
- The median length of project participation for leavers is from 90 to 120 days. (Benchmark is set from 90 to 120 days.)

Planning Ahead: CY2027 ESG Program Competition for the NC BoS CoC

- Email Reminders of the deadline for the competition.
- Grant Management Software - ZoomGrants
- To keep applicants from submitting without uploading required documents
- To keep applicants from submitting without responding to required questions (Supplemental Information Form built into the system)
- Survey to NC BoS CoC Stakeholders or "just" ESG Applicants & Regional Leadership
- HUD TA
- Feedback on Survey Needed
- Word doc – will send out after our meeting today for feedback by Friday, September 26th – *does this give you enough time?*
- Discussion/Other Thoughts?

- Melissa McKeown noted that the September 26 date works well for her. She suggested possibly sending the survey to previous ESG applicants. She also asked if there is a cost associated with ZoomGrants. Joanne confirmed that there is a cost but said she believes the financial cost is outweighed by the amount of staff time saved during the competition.
- Lynne James agreed with Melissa's suggestion to send the survey only to those who previously participated in the competition. Amy Modlin and Melissa Hewitt also agreed. Lynne added that she likes giving applicants the opportunity to correct mistakes.
- Jenny noted that the current ESG process required significant time and included multiple errors. She said she would send the survey out today to FPS members and hopes to receive feedback by Friday, September 26.
- Lynne raised a question about the appeals process and asked if anything is being done to improve it. Jenny responded that the survey includes space to solicit feedback on appeals. She also stated that the appeals document needs to be clearer and revised, since so many scenarios come up and too much is left to interpretation.

FY2025 CoC Program Funding Priorities

Reconsider FY2025 CoC Program Funding Priorities

Email from HUD SNAPs office on July 3rd:

"Dear Continuums of Care,

Thank you for your work to serve the most vulnerable Americans without housing. You, more than anyone, know that the nation's homelessness crisis is at a historic high, and that our communities shoulder the tragic impacts of this crisis every day. With 770,000 people experiencing homelessness — 275,000 people unsheltered on our streets — HUD is dedicated to supporting local solutions that reduce unsheltered homelessness and increase long term stability and self-sufficiency. The status quo is unacceptable for every American, with or without a home.

In response, HUD intends to publish a NOFO for 2025 Continuum of Care (CoC) awards. HUD invites CoCs to prepare for an application focused on treatment and recovery, reducing unsheltered homelessness, reducing returns to homelessness, and increasing the earned income of participants.

The NOFO will seek to provide opportunities for new types of projects including street outreach and transitional housing programs. HUD encourages CoCs to evaluate the effectiveness of their projects at contributing to the community-wide goals above and to ensure that the most effective partners, including faith-based organizations, are involved.

We recognize this is a new application process for 2025 funding and are committed to providing CoCs with the resources needed to serve their communities.

Alongside you, Secretary Turner and all of HUD recognize the inherent dignity of every man, woman, and child without a home. It is HUD's mission to steward resources so that no person is left to languish on our streets or to suffer in the grip of addiction. Thank you for your partnership to that end."

CoC Builds NOFO – Language included in this HUD funding opportunity was different than what we have seen in the past as it was reflective of needing to be in compliance with the federal administration’s executive orders.

We believe the changes we saw in the CoC Builds NOFO may be indicative of what we could see in a new NOFO for the CoC Program Competition.

- Amy Modlin asked whether the current timeline might be indicative of what to expect moving forward.
- Jenny noted that the CoC Builds process lasted only a week and operated on a first-come, first-served basis. She explained that the NOFO stated applications would be considered and prioritized in that order. Jenny added that they have been on calls with groups across the nation and heard widespread frustration and concern about the quick turnaround. Whether the FY25 CoC Program NOFO will be a quick turn around remains a significant unknown.
- Lynne James brought up the injunction related to the CoC Builds and questioned what might happen if the same language remains in place and someone were to file an injunction for the CoC Competition.
- Jenny responded that this issue is addressed in the presentation slides.

CoC Builds – Language/Requirements

1. Applicants must meet Threshold Requirements: Must be an eligible applicant without outstanding, unresolved judgements against them for violations of civil rights laws. Must submit application before deadline.
 - Applicants must respond to a Merit Review:
 - The applicant provides regular, **on-site** supportive services to participants including case management, healthcare, and behavioral health services.
 - The proposed project will **require** program participants to participate in supportive services by contract, occupancy agreement, or lease.
 - The applicant does not operate drug injection sites or “safe consumption sites,” knowingly distribute drug paraphernalia on or off of property under their control, permit the use or distribution of illicit drugs on property under their control, or conduct any of these activities under the pretext of “harm reduction.”
 - The applicant does not and will not promote, encourage, subsidize, or facilitate racial preferences or other forms of illegal discrimination.
 - The applicant does not and will not deny the sex binary in humans or promote the notion that sex is a chosen or mutable characteristic.
 - **The city, county, or state in which the project is located *:**
 - a. Prohibits public illicit drug use and enforces such prohibition;
 - b. Prohibits public camping or loitering and enforces such prohibition;
 - c. Utilizes standards that address individuals who are a danger to themselves or others;
 - d. Substantially implements and complies with the Sex Offender Registration and Notification Act, particularly in the case of registered sex offenders with no fixed

address, including by adequately mapping and checking the location of homeless sex offenders.

- **The city, county, or state in which the project is located cooperates with Federal immigration enforcement. ***
- Fewer than 10% of the applicant's current participants who have exited the program return to homelessness within 24 months according to HMIS data or their own data system. (No performance data required in previous NOFOs, only statements to participate in CoC systems and describe experience in homeless service programs)

Lynne wondered if HUD would want to review the APR to assess the rate of return.

Andrea clarified that returns are not included in the APR but noted that it is possible HUD could use other data they already have access to.

CoC Builds – New Language/Requirements

3. Applicants must complete an application that is subject to a Risk Review:

- Budget includes eligible costs and is feasible based on applicant's capacity
- Applicant is able to meet grant management standards
- Applicant has a history of good performance (timeliness of compliance with reporting requirements, expenditure of match funds, etc.)

CoC Builds – New Scoring Method

HUD will conditionally select project applications based on applications using the following process:

1. HUD will determine whether the application meets the threshold requirements;
2. HUD will then select the applications in order of submission timestamp that affirm "Yes" to all the criteria in the merit review and are from states with fewer than 2,500,000 people until \$30,000,000 in awards are made. HUD may award less than that amount if an insufficient number of eligible applications from small states are received.
3. HUD will then select the remaining applications in order of submission timestamp that affirm "Yes" to all the criteria in the merit review until the total amount of funding for awards for applications is up to \$75,000,000.

Tie Breaking Rules: Submission timestamps will be used to determine awards for equally eligible applicants.

The initial CoC Builds NOFO did not include any component of "order submitted" in scoring process. Applications were not required to meet all scoring standards in order to be considered (excluding threshold).

CoC Builds – New Post-Award Requirements

- 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.

- Implementing 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" Initiative); 14218 (Ending Taxpayer Subsidization of Open Borders); 14202 (Eradicating Anti-Christian Bias) and 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)

CoC Builds – New Reporting Requirements

- "HUD is implementing new grants management and reporting tools, which will be rolled out for your use in the near term. As a grantee, you will be required to report on grant performance and financial activities (including vendor and cash disbursement supporting details for yourself and your sub-recipients) using these new tools when they are released. HUD will work with you to support your transition to this new reporting environment. Once implemented, timely reporting in this new environment will be mandatory."

No additional reporting requirements were placed on CoC Builds grantees than in the original CoC Builds NOFO, but we see a window for new reporting requirements.

NEWS! [NAEH Files Lawsuit against HUD](#) on 9/11/25

"The lawsuit, filed in the U.S. District Court for the District of Rhode Island, asserts that HUD's newly imposed criteria for "Continuum of Care (CoC) Builds" grants are unconstitutional and unlawful. This is the third time that HUD has issued this same grant opportunity, even after grant awards had already been announced to Congress. In so doing, HUD has introduced extreme political criteria to the application. Under the new funding application rules, service providers and communities are blocked from applying for federal housing funds for new Permanent Supportive Housing for individuals and families experiencing homelessness if they operate in jurisdictions with policies the Trump-Vance administration disfavors."

The case, *National Alliance to End Homelessness v. Turner, et al.*, asks the court to block HUD's unlawful funding restrictions and restore fair access to federal housing funds for providers nationwide.

Temporary Restraining Order Granted on 9/12/25

Rhode Island, September 12, 2025 — The U.S. District Court for the District of Rhode Island granted a temporary restraining order (TRO) today in *National Alliance to End Homelessness v. Turner, et al.*, halting the Trump-Vance administration's unlawful restrictions on federal housing funding through the "Continuum of Care (CoC) Builds" program.

The order ensures that providers and communities will not be barred from competing for lifesaving housing resources simply because they are located in jurisdictions that don't adopt the administration's ideological agenda, while the litigation continues.

- Joanne shared her experience with the 2025 Capitol Hill Housing Day. Topics discussed included EHV vouchers, CoC Builds, and Program Competitions, with a request that HUD follow the two-year NOFO cycle.
- Andrea added that Senator Tillis' office, in particular, expressed concern about the lack of communication since the July 3rd email. She noted that staff are viewing the situation as a constituent services issue, since programs are left uncertain about how to continue operating without updates.
- Andrea also shared that the Democrats' continuing resolution proposal (budget negotiations) includes honoring the two-year NOFO schedule, making this year non-competitive and extending previous grants.

CoC Builds – Shorter Timeline

This CoC Builds funding opportunity was released on Friday, September 5th with a submission due date of Friday, September 12th. For context, the 2024 CoC Builds opportunity provided applicants with nearly 6 months (extended) and the early 2025 CoC Builds opportunity provided applicants with nearly 2 months.

Never mind the CoC's responsibility in hosting a fair competition, any interested applicants would have need to propose a plan to construct, acquire, or rehabilitate PSH units, which often includes communications with contractors. Applicants were required to show leveraging of non-CoC funded housing resources in their application: Coordination with housing providers, and other organizations for new construction, acquisition, and rehabilitation to provide at least 50 percent of the amount being requested in the application, or the project is leveraging non-CoC funded housing resources to provide subsidies for at least 25 percent of the units that are proposed in the application.

Grantees would have need to provide evidence of site control and completed an environmental review and subsidy layering review prior to grant agreement.

Preparing for the CoC Program Competition

- If we see any of these new components of the CoC Builds NOFO (new requirements on Merit Review, new post-award requirements, and new reporting requirements) on the annual CoC Program Competition NOFO, our Steering Committee and associated subcommittees will need to be prepared to react quickly.
- CY2025 CoC Program Funding Priorities
- Written Standards
- Scorecards

CY2025 CoC Program Funding Priorities

- Ensure essential infrastructure elements are in place, including HMIS and coordinated entry

- Ensure adequate coverage of permanent supportive housing across the CoC
- Increase the availability of rapid rehousing
- Ensure CoC Program funding is being used well, including potentially re-allocating some funding from projects that have patterns of low spending or poor performance

Will likely need to consider how to accommodate **Street Outreach** and **Transitional Housing Written Standards**

We will likely need to specifically accommodate project requirements that typically go against our Written Standards, as described as required in the FY2025 CoC Program NOFO.

We can have specific sections in each activity type on FY2025 CoC Program grantees as we expect the written standards as written to be continued for everyone else.

For example;

Permanent Supportive Housing Written Standards:

FY2025 CoC Program Permanent Supportive Housing grantees will **require** program participants to participate in supportive services including treatment and recovery.

What is NCCEH Doing?

- NC BoS Staff: Meeting weekly on Tuesdays to strategize around the CoC Program Competition.
- NCCEH: Hosting Office Hours most Thursdays at 2:00 PM for those interested in the CoC Competition. This next Thursday, September 25, will be the last weekly Office Hour until HUD releases any new information about the CoC Competition.

Discussion

- Amy Modlin reflected on past renewal processes, noting the years of effort to make the work inclusive and effective. She expressed grief over the progress that has been lost.
- Lynne voiced concern about the timeline, questioning whether there will be enough time to complete the necessary changes and committee meetings before the NOFO deadline.
- Jenny noted that the FY24 grant agreements included language prohibiting the promotion of “gender ideology” when using federal funding.
- Andrea shared that there are administrative rules pending review, either through NAEH or Housing Policy, following a recent public comment period.

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Next Funding and Performance Subcommittee Meeting is on October 16th, 2025, at 2 PM