



2025 NOFO UPDATES

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MCAH MISSION

MCAH serves as an inclusive voice to improve systems and support communities in a way that leaves no one behind.

#ThePowerofOne

Welcome back! The situation is complicated & a lot is going on- let's talk about impact first:



WHAT SHOULD COCS FOCUS ON RIGHT NOW

- COCS should submit renewals and reallocations pursuant to the 24/25 NOFO
- **DUE 2/19**
- **Awards Expected May 1, 2026, IF HUD DOES NOT ISSUE A NEW NOFO AND/OR THERE IS NO GOVERNMENT SHUTDOWN (CR expires on January 30th)**



WHAT SHOULD COCS FOCUS ON RIGHT NOW

- COC's should continue to let the State legislature know of any funding gap because of the award delay & advocate for stopgap funding
- COC's should continue to advocate for an amendment to the T-HUD bill requiring that HUD honor the 24/25 NOFO and not issue another NOFO
- COCs should continue to advocate for private dollars and speak out against the criminalization of homelessness
- COC should join MCAH and work to continue to raise a collective voice



How did we get here- a recap: Notice of COC Funding Opportunities

- COC NOFO is largest federal investment in addressing homelessness - last year Michigan received \$108,000,000
- Only 30 percent of a CoC's funding is protected in Tier 1, down from 90 percent in past years.
- Permanent Housing (PSH, RRH, Joint TH-RRH) is capped at 30 percent of ARD.
- All projects except for CoC Planning/UFA must compete, including YHDP renewals and DV Bonus.
- New prohibitions can disqualify any project.
- HUD's new national priority centers on treatment, recovery, and required services.



LITIGATION

- MCAH has signed on for its membership to the litigation co-led by Attorney General Nessel with 20 other states challenging the 2025 NOFO
- The AG litigation was filed concurrently with a lawsuit by the NAEH & Democracy Forward



LITIGATION- WITHDRAWAL OF NOFO

The 2025 COC NOFO was withdrawn at 2:30 on December 8, before a 3:30 hearing for a temporary restraining order on the 2025 COC NOFO



LITIGATION- WITHDRAWAL OF NOFO

- 12/19 Hearing- Court Stayed the withdrawal of the NOFO because:

The Court believed it was an attempt to avoid jurisdiction & there would be irreparable harm if the NOFO was delayed.

- **A new NOFO was issued on 12/19 but has no force or effect because of the 12/19 stay.**



LITIGATION- WITHDRAWAL OF NOFO

12/19 Written Order

- Halted the withdrawal of the NOFO so the Case against the first NOFO could go forward
- Ordered HUD to come up with a plan on how to move forward in case they lose, short of actually awarding the funds



LITIGATION-HUD PLAN

It is a plan that provides a way forward if HUD loses the lawsuit.

- Reinstates the 24/25 NOFO
- Re-opens the portal for renewals and reallocations pursuant to the **24/25 NOFO**
- **DUE 2/26**
- **Awards Expected May 1, 2026 IF HUD DOES NOT ISSUE A NEW NOFO AND/OR THERE IS NO GOVERNMENT SHUTDOWN**



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