

MEMO TO FILE: NOFO Impacts #3 – Other Providers

FROM: Gavin Cooley, President, Spokane Business Association
DATE: May 19, 2026
RE: Estimated impact of the FY 2026 HUD CoC NOFO rebalance on additional Spokane homelessness providers (Spokane Housing Authority, YWCA, Family Promise, SNAP, Frontier Behavioral Health, Salvation Army, Jewels Helping Hands, Revive, CAT, Truth Ministries, and others)

Executive Summary

This memo is the third in a series. The first two analyzed Catholic Charities Eastern Washington and Volunteers of America Eastern Washington & Northern Idaho. This memo covers the remaining significant Spokane homelessness providers in a single document: Spokane Housing Authority, YWCA Spokane, Family Promise of Spokane, SNAP, Frontier Behavioral Health, The Salvation Army, Jewels Helping Hands, Revive Counseling and Reentry, Compassionate Addiction Treatment (CAT), Truth Ministries, and brief notes on Goodwill Industries of the Inland Northwest and Pioneer Human Services. The framing question is the same: how does the anticipated FY 2026 HUD CoC NOFO rebalance (a 30% cap on permanent housing, expected publication June 1, 2026) affect each of these organizations?

The headline finding is that the NOFO change matters less to most of these organizations than to CCEW and VOAEW, and for entirely different reasons in each case. Spokane Housing Authority has very limited direct CoC exposure but is structurally entangled with every PSH building in the city through project-based voucher and HUD-VASH layering; its risk is indirect but very real. SNAP and YWCA both hold direct CoC project lines (RRH and DV joint TH-RRH respectively) and are moderately exposed, though DV bonus dollars are likely protected. Family Promise's family RRH line is exposed but its model is already shifting toward emergency shelter and prevention, which the rebalance favors. Frontier Behavioral Health has essentially zero direct CoC exposure but operates the services backbone of PSH buildings that could become unviable if CCEW or VOA lose CoC supportive services dollars. Salvation Army, Jewels Helping Hands, Revive, CAT, and Truth Ministries are essentially insulated and may see modest gains. Pioneer and Goodwill are minor footnotes for this analysis. Treat all dollar figures as directional; the actual June 1 NOFO and the WA-502 ranking outcome will determine specifics.

Context: HUD Funding Flowing Into Spokane

The CCEW and VOAEW memos focused on the \$12 million combined annual HUD entitlement and CoC flow into the Spokane region. For this combined memo, the picture expands to include the much larger Housing Choice Voucher program administered by Spokane Housing Authority — operating under separate Section 8 statutory authority but functionally entangled with every CoC-funded PSH building in the city.

HUD program	Annual amount	Where it generally goes in Spokane
CDBG (City entitlement)	\$3,017,244	Administered by City CHHS. SNAP is one of the largest CDBG sub-recipients in Spokane. Salvation Army, Family Promise, and YWCA also receive CDBG sub-grants in various years.
HOME (City entitlement)	\$1,138,478	HOME tenant-based rental assistance flows through Spokane Housing Authority. HOME capital flows into LIHTC stacks on partner PSH buildings.
ESG (City entitlement)	\$267,764	Emergency Solutions Grant for shelter operations, street outreach, RRH, and HMIS. Family Promise, YWCA, and SNAP are typical sub-recipients.
CoC competitive (Regional)	\$6,333,005	WA-502 Spokane City and County Continuum of Care. Beyond CCEW and VOA, key sub-recipients include YWCA (DV transitional), Family Promise (family RRH), and SNAP (RRH).
Housing Choice Voucher program (separate authority)	approx. \$75-95M	Administered by Spokane Housing Authority — separate from CoC and HUD entitlement, operates under Section 8 statutory authority. Includes HUD-VASH, EHV, Mainstream Vouchers, and project-based vouchers layered on Haven and other PSH buildings.
TOTAL HUD into Spokane region	approx. \$90-110M	Combined entitlement + CoC + voucher program. The CoC NOFO debate is a fight over the \$6.3M CoC line, but the larger HUD footprint includes SHA's voucher program, which is structurally tied to CoC-funded PSH operations.

The CoC NOFO debate is a fight over the \$6.3 million CoC line and its scoring rules. The CDBG, HOME, ESG, and HCV authorities are not directly affected by the NOFO restructure. But the operational reality is that PSH in Spokane is built on a stack: HUD CoC supportive services plus SHA project-based vouchers plus state HTF capital plus city/county recording fees plus philanthropy plus Apple Health FCS. Pull any single layer hard enough and the stack wobbles.

At-a-Glance: NOFO Exposure for Each Provider

The table below summarizes each organization's HUD CoC footprint and overall exposure to the FY 2026 NOFO change. Exposure ratings are color-coded: red shading marks organizations with the most material risk (direct or strategic), yellow marks moderate exposure, and green marks low or no exposure. The detailed per-organization analysis follows in the next sections.

Organization	Op. budget (est.)	HUD CoC direct lines	NOFO exposure and rationale
Spokane Housing Authority	\$75–95M (HUD pass-through)	None direct; PBV layering on PSH	LOW direct / HIGH indirect. HCV/PBV revenue is appropriated separately. But every PSH building dependent on PBV layering plus CoC services dollars is structurally tied to SHA — if the services side collapses, the units SHA's vouchers are tied to may go offline. October 2024 HCV referral halt is the recent precedent.
YWCA Spokane	\$8–11M	Yes — DV joint TH-RRH (FY23 amount not extracted)	MEDIUM. DV Bonus projects within CoC are typically protected as a separate category. TH/RRH model is closer to what the rebalance favors than to what it cuts. But absorbed approx. \$400K in federal cuts in 2025 and closed 3 of 6 DV apartment units — already operating under stress.
Family Promise of Spokane	\$5–8M	Yes — family RRH and emergency-to-PH line	LOW–MEDIUM. Portfolio is dominated by emergency family shelter and prevention, both favored by the rebalance. Family RRH lines are at risk if RRH is deprioritized relative to TH. Recent expansion (Valley site \$1M, 15 scattered-site beds) is city-funded, not CoC-funded.
SNAP (Spokane Neighborhood Action Partners)	\$25–35M (agency); \$8–12M housing	Yes — RRH (\$200K–\$500K est.)	MEDIUM. RRH line directly exposed if NOFO disfavors RRH. Bigger concurrent risk: federal LIHEAP and CSBG cuts threatening SNAP's anti-poverty backbone. CDBG passthroughs

Organization	Op. budget (est.)	HUD CoC direct lines	NOFO exposure and rationale
			are not affected by NOFO.
Frontier Behavioral Health	\$70–95M (agency); \$5–10M housing services	None direct	LOW direct / MEDIUM strategic. FBH's revenue is Medicaid and state. But FBH is the services backbone on partner PSH buildings funded by CoC. If CCEW or VOA loses CoC services dollars, the buildings FBH staffs become unviable, eroding FBH's billable Medicaid populations.
The Salvation Army Spokane	\$6–10M (Citadel); \$1.5–2.5M Way Out	Minimal direct CoC	LOW. The Way Out is TH/bridge housing, exactly what the rebalance favors. Primarily City and County funded.
Jewels Helping Hands	\$2–3M	None confirmed	VERY LOW. Funded almost entirely by City of Spokane (general fund + ARPA + emergency declaration). Cannon Street Navigation Center \$1.7M contract through March 2027 is locked in.
Revive Counseling and Reentry	\$3–6M	None confirmed	LOW. Heavily Medicaid FCS and state DOC reentry funded. NOFO rebalance is largely orthogonal to its revenue.
Compassionate Addiction Treatment (CAT)	\$2–4M	None confirmed	VERY LOW. Treatment-side funding (HCA, Medicaid, City Mobile MAT contract ~\$200K). Rebalance's emphasis on treatment categories may marginally help.
Truth Ministries	\$75K–\$150K	None	ZERO direct. Faith-based men's shelter; ~\$50K/yr of donations plus city \$2/night bed-fee prepayments. Independent of public funding.
Goodwill Industries	(housing)	None direct	LOW. Operates SSVF (veterans)

Organization	Op. budget (est.)	HUD CoC direct lines	NOFO exposure and rationale
(Inland NW)	portion small)		and FCS housing services for Spokane region; both VA- and Medicaid-funded, not HUD CoC.
Pioneer Human Services Spokane	(small Spokane footprint)	None direct	LOW. 10 downtown apartment units for Trueblood class members; state and Medicaid funded.

1. The Policy Change in One Page

HUD's May 2026 announcement (HUD No. 26-031) states that the agency intends to rebalance the CoC program toward a diversity of solutions targeting the underlying causes of homelessness, with increased investment in transitional housing, supportive services only (SSO) projects (street outreach, childcare, outpatient addiction treatment, job training), and supportive services. Stakeholder and press reporting from late 2025 through May 2026 describes the operative numerical structure as:

- A cap of roughly 30% on the share of CoC awards that may fund permanent housing as a category, meaning PSH and RRH combined, versus the roughly 87 to 90% share that permanent housing has held historically.
- Substantial expansion of the transitional housing share, which has been around 1% of national CoC awards in recent years.
- Expansion of SSO components including outreach, treatment navigation, employment, childcare, and recovery supports.
- Possible conditions on permanent housing aid, including work or treatment expectations, time limits, and stricter prioritization rules.

The proposal has had a complex procedural path. HUD initially advanced the change in late 2025, withdrew the NOFO in December 2025, and an April 2026 federal court ruling constrained the administration's ability to alter funding conditions outside formal rulemaking. Congress included triggers in the FY 2026 Consolidated Appropriations Act that would auto-renew all expiring CoC projects if HUD has not made awards by July 1, 2026. As of this writing, HUD is preparing a second attempt at the NOFO targeted for June 1, 2026 publication.

2. Spokane Housing Authority (SHA)

Scope and funding

Spokane Housing Authority is by far the largest single conduit of federal housing dollars into the Spokane region. It reports housing assistance to over 6,200 families annually through tenant-based Housing Choice Vouchers, project-based vouchers, and SHA-managed properties. SHA operates jointly across Spokane city and county plus Adams, Ferry, Lincoln, Pend Oreille, Stevens, and Whitman counties. Importantly, SHA holds essentially no traditional public housing units — it is a voucher-and-portfolio agency rather than a public housing PHA. The table below assembles the principal SHA funding lines.

Stream	Annual / count	Confidence	Notes
Housing Choice Vouchers (tenant-based)	approx. 5,500–5,800 vouchers	Estimate	Section 8 HCV; the bulk of SHA's voucher portfolio. Total household count reported as ~6,200; HCV is the dominant component.
HUD-VASH (veterans vouchers)	approx. 250–325 total; up to 60 PBV	Confirmed (60 PBV); rest estimate	November 2024 SHA RFP authorized up to 60 HUD-VASH PBVs for layering on PSH. Total VASH allocation estimated against mid-size Western PHA norms.
Emergency Housing Vouchers (EHV)	approx. 120–140	Estimate	ARPA-funded 2021 allocation; runs to attrition. Exact count not confirmed from public sources retrieved.
Mainstream Vouchers	approx. 80–125	Estimate	For non-elderly persons with disabilities.
HOME Tenant-Based Rental Assistance	Administered via City/County HOME	Confirmed (program)	SHA administers HOME-TBRA on behalf of City of Spokane and Spokane County HOME entitlement awards.
Project-Based Vouchers on partner PSH	approx. 400–600 units	Estimate	PBV layering on CCEW Haven properties, VOA's Marilee, Hope House PSH, and other partner sites. The operational anchor of Spokane PSH.
Family Self-Sufficiency (FSS)	Coordinator-funded program	Confirmed	Annual FSS NOFO funds the coordinator position; voluntary

Stream	Annual / count	Confidence	Notes
			participant escrow program.
TOTAL annual HUD pass-through to SHA	approx. \$75–95M/yr	Estimate	Sum of HAP payments, administrative fees, and program-specific grants. The SHA Financial and Federal Single Audit Report 2024 has the precise figure but was not retrieved in this pass.

CoC NOFO exposure

SHA's direct CoC NOFO exposure is low: the HCV program operates under separate Section 8 statutory authority and is not affected by the FY 2026 CoC restructure. SHA does not appear to be a direct WA-502 CoC sub-recipient for project lines in recent award reports — the CoC PSH operating dollars flow to CCEW, VOA, YWCA, Family Promise, and SNAP, while SHA contributes the voucher layer separately.

SHA's indirect exposure, however, is very high. Every CCEW Haven property and VOA Marilee unit dependent on SHA project-based voucher layering plus CoC supportive services dollars is structurally tied to both agencies remaining solvent. If the FY 2026 NOFO cuts CCEW or VOA CoC services funding, the buildings SHA's PBVs are tied to become operationally unviable — the units do not close, but the supportive services that keep chronically homeless tenants housed degrade, and SHA's PBV utilization rate could drop as turnover rises and re-leasing slows. The October 2024 SHA HCV referral halt, when federal funding shortfalls and rent inflation outran the HAP budget and SHA paused referrals to 19 partner agencies, is the recent precedent: SHA can be operationally stressed by upstream HUD decisions even when its own statutory authority is intact.

Recent news

In October 2024, SHA halted new HCV referrals after HAP shortfalls forced an emergency response; HUD subsequently announced approximately \$40 million in voucher funding for SHA. CEO Pam Tietz remains in place. SHA's November 2024 HUD-VASH PBV RFP signaled an intent to deepen the PBV-on-PSH model, layering up to 60 additional VASH vouchers on partner buildings.

3. YWCA Spokane

Scope and funding

YWCA Spokane operates the sole designated domestic violence emergency shelter for Spokane County, plus DV-specific transitional and emergency apartments, a 24/7 helpline, legal advocacy, and children's services. YWCA reported serving more than 18,000 clients in 2024. The confidential DV shelter capacity is not publicly disclosed for safety reasons; estimated at 30 to 40 beds. YWCA historically operated six DV transitional or emergency apartment units, three of which were closed in 2025 following approximately \$400,000 in federal cuts.

Federal DV funding sources include VAWA STOP and Transitional Housing grants, FVPSA shelter funding, and VOCA victim services pass-through via the Washington Department of Commerce Office of Crime Victims Advocacy. Operating budget is estimated at \$8 to \$11 million annually, with more than 75% from government grants per public reporting. YWCA was one of four providers awarded scattered-site shelter bed funding under Mayor Brown's November 2025 emergency declaration.

CoC NOFO exposure (MEDIUM)

YWCA holds at least one direct CoC project line — a domestic violence joint TH-RRH program — though specific FY 2023 dollar amounts could not be extracted from the WA-502 award report in this research pass. DV Bonus projects within CoC are typically established as a separate, protected category in HUD's NOFO design, which historically insulates them from the broader CoC funding contests. The 30% PH cap is unlikely to directly threaten DV transitional housing, and at the margin YWCA's TH-heavy model is closer to what the rebalance favors than what it cuts.

The bigger risk for YWCA is the concurrent erosion of VAWA, FVPSA, and VOCA federal lines that are independent of the CoC NOFO but trending in the same direction. The 2025 cuts that closed three DV apartment units already demonstrate the operating fragility.

4. Family Promise of Spokane

Scope and funding

Family Promise of Spokane operates the only 24/7 family emergency shelter in Spokane (Open Doors), plus the Bridges transitional housing program, Neighbors prevention and diversion services, Village aftercare, and the FLASH leasing program. The agency reports that 805 people exited homelessness through its programs in 2024, including 449 children. Open Doors expanded with a renovated facility purchased in 2019, and a Spokane Valley shelter site received approximately \$1 million in 2024 funding. In January 2025, the City added 15 scattered-site beds under a Family Promise contract.

Funding sources include WA Commerce Consolidated Homeless Grant family-shelter category dollars, ESG family-shelter pass-through via Spokane County, City CHHS contracts, and capital grants. Annual operating budget is estimated at \$5 to \$8 million.

CoC NOFO exposure (LOW-MEDIUM)

Family Promise holds CoC-funded family RRH and likely an emergency-shelter-to-PH project line, though FY 2023 specific amounts could not be extracted. The agency's portfolio is dominated by emergency family shelter, family RRH, and prevention — the first and third of which align with the NOFO rebalance direction. The family RRH line is the one at material risk if the final NOFO disfavors RRH in favor of pure transitional housing. Recent capacity expansion (Valley site, 15 scattered-site beds) is city-funded rather than CoC-funded and therefore unaffected.

5. SNAP (Spokane Neighborhood Action Partners)

Scope and funding

SNAP is the designated Community Action Agency for Spokane County, in operation since 1966. It runs more than 30 programs across housing, financial empowerment, energy assistance (LIHEAP), weatherization, lending, Individual Development Accounts, and homeownership. Total agency operating budget is estimated at \$25 to \$35 million, with the housing and homelessness portion approximately \$8 to \$12 million.

On the homelessness side, SNAP holds Spokane County's CoC-funded Rapid Rehousing project (referenced in the Spokane County Annual Action Plan, where SNAP RRH "utilizes full ESG award and admin costs"), administers Housing Essential Needs (HEN), Diversion, and short-term rental assistance. SNAP is also one of the largest CDBG sub-recipients in Spokane — the City received \$3 million+ in CDBG and Spokane County roughly \$1.5 million, with SNAP a major recurring partner across both jurisdictions.

CoC NOFO exposure (MEDIUM)

SNAP's CoC RRH line is directly exposed if the final NOFO disfavors RRH relative to transitional housing. The FY 2023 specific dollar amount was not extracted but is historically in the \$200,000 to \$500,000 range. The bigger concurrent risk to SNAP is not the CoC NOFO at all — it is the federal threat to LIHEAP (Low Income Home Energy Assistance Program) and CSBG (Community Services Block Grant), both of which faced cut proposals in late 2024 and 2025. CSBG is the foundational federal funding line for Community Action Agencies nationwide. SNAP's CDBG passthroughs are not affected by the NOFO, but a coordinated cut to LIHEAP, CSBG, and CoC RRH simultaneously would be the worst case.

6. Frontier Behavioral Health (FBH)

Scope and funding

Frontier Behavioral Health is the largest behavioral health provider in eastern Washington, formed in 2011 through the merger of Spokane Mental Health (1970) and Family Service Spokane (1905). FBH operates the PACT (Program of Assertive Community Treatment) team, the Trueblood Supportive Housing program, and onsite behavioral health teams embedded at CCEW Catalyst, Father Bach Haven, and other partner buildings. The Trueblood housing

partnership delivers 10 Pioneer Human Services apartments downtown, 24 CCEW units near SFCC, and additional FBH-direct units.

FBH is a confirmed Apple Health Foundational Community Supports provider on multiple Medicaid managed care plan provider directories, which is a major billing channel for FBH's housing services. Total agency operating budget is estimated at \$70 to \$95 million, with the supportive housing component an estimated \$5 to \$10 million. Spokane Valley City Council renewed FBH's contract in December 2024 for the 2025 through 2027 period.

CoC NOFO exposure (LOW direct, MEDIUM strategic)

FBH's revenue is Medicaid and state — the FY 2026 CoC NOFO does not threaten its direct funding. The strategic exposure is more interesting: FBH is the services backbone on partner PSH buildings whose CoC services dollars are at risk under the NOFO. If CCEW or VOA loses CoC supportive services funding for buildings where FBH delivers the embedded behavioral health team, three things happen: the buildings become operationally less viable, the case management ratio thins, and FBH loses access to a captive, billable Medicaid population for its FCS supportive housing benefit. The risk is to FBH's growth trajectory rather than to its current revenue, but it is real.

7. The Salvation Army of Spokane

Scope and funding

The Salvation Army Spokane Citadel Corps operates The Way Out Bridge Housing Center (transitional and bridge housing for up to 60 adults), Sally's House (a 20-bed emergency shelter for children ages 2 to 12 removed from home, child-welfare not homeless-services), Evangeline's House (a 6-bed shelter for youth 12 to 20), and the Nurturing Center. Total Citadel operating budget is estimated at \$6 to \$10 million across all programs; The Way Out portion is approximately \$1.5 to \$2.5 million.

The Way Out received a Spokane City Council 5-year funding commitment in 2021, Spokane County purchased the building with COVID/ARPA aid, and the City and County jointly support ongoing operations. Salvation Army nationally raised approximately \$2 million from two Valley property sales recently, contributing to general program stability.

CoC NOFO exposure (LOW)

Salvation Army's Spokane homeless portfolio is essentially transitional and bridge housing — exactly the model the NOFO rebalance is intended to favor. CoC direct dependency is minimal; the operating economics are anchored in City and County contracts. If anything, the rebalance could route additional state and local TH dollars to The Way Out.

8. Jewels Helping Hands

Scope and funding

Jewels Helping Hands was awarded a \$1.7 million contract through March 2027 (on a 5 to 2 City Council vote in September 2025) to operate the Cannon Street Navigation Center, the hub of Mayor Brown's scattered-site shelter model. Originally a 30-bed facility, the navigation center is pivoting to daytime services rather than overnight beds. JHH also operates scattered-site shelter beds under the November 2025 50-bed emergency expansion. The operating model is low-barrier and harm-reduction-oriented; JHH coordinates entry and triage into the broader scattered-site network.

Funding is almost entirely City of Spokane: general fund, ARPA, and emergency declaration funds. JHH has no confirmed historical CoC funding. Annual operating budget is estimated at \$2 to \$3 million.

CoC NOFO exposure (VERY LOW)

With no meaningful CoC dependence and a locked-in \$1.7M city contract through March 2027, JHH is among the most insulated providers in this analysis. The NOFO rebalance toward TH and SSO categories could marginally help JHH access state or city sub-grants in the 2027 contract cycle.

9. Revive Counseling and Reentry

Scope and funding

Revive provides behavioral health and substance use counseling plus transitional housing for individuals exiting jail or prison. Revive is also a confirmed Apple Health Foundational Community Supports provider for tenancy support and supported employment. One of four operators of the November 2025 City scattered-site emergency shelter expansion. Operating budget is estimated at \$3 to \$6 million, heavily Medicaid-billed.

Funding mix: Apple Health and Medicaid (FCS through MCOs including Wellpoint), WA Department of Corrections reentry contracts, City of Spokane shelter contracts, and private pay counseling. No confirmed HUD CoC lines.

CoC NOFO exposure (LOW)

Revive's funding stack is dominated by Medicaid FCS and state DOC reentry dollars. The CoC NOFO rebalance is largely orthogonal to its revenue. The treatment-focused emphasis of the new NOFO may marginally route additional resources to providers like Revive through city or state sub-grants.

10. Compassionate Addiction Treatment (CAT Spokane)

Scope and funding

CAT Spokane provides holistic substance use disorder recovery services for people experiencing homelessness, with a day-services hub at 168 S. Division. CAT was awarded approximately \$200,000 in a City contract for Mobile Medication-Assisted Treatment under

Mayor Brown's November 2025 emergency declaration, and was one of four operators of the scattered-site emergency shelter expansion. Annual operating budget is estimated at \$2 to \$4 million.

Funding mix: WA Health Care Authority SUD treatment dollars, Medicaid FCS, private foundations, and City contracts. No confirmed CoC funding.

CoC NOFO exposure (VERY LOW)

CAT's funding is on the treatment side rather than the CoC side. The NOFO rebalance's emphasis on treatment categories could actually channel additional resources to CAT via City and County sub-grants. Minimal direct risk.

11. Truth Ministries

Scope and funding

Truth Ministries operates a faith-based men's overnight shelter at 1910 E. Sprague, averaging 50 men per night. Historic operating budget is approximately \$50,000 to \$150,000 per year, anchored in donations, churches, and private giving. The City of Spokane has periodically prepaid the \$2 nightly bed fee for 40 beds to ensure free access. No confirmed CoC funding.

CoC NOFO exposure (ZERO direct)

Truth Ministries' independence from public funding means almost any direction the NOFO takes is survivable. If the rebalance routes additional state or city ESG to faith-based emergency shelter, Truth could see modest gains; if not, the operating model continues largely unchanged.

12. Other Notable Providers

Goodwill Industries of the Inland Northwest

Operates Housing and Essential Needs (HEN), FCS Supportive Housing services, and SSVF (Supportive Services for Veteran Families) for the Spokane region. SSVF brings an estimated \$2 to \$4 million in VA pass-through annually. NOFO exposure is low because the funding base is VA and Medicaid, not HUD CoC.

Pioneer Human Services Spokane

Reentry housing and recovery services; 10 apartment units downtown for Trueblood class members, in partnership with Frontier Behavioral Health and CCEW. Statewide nonprofit funded primarily through Medicaid and state Department of Corrections contracts. NOFO exposure is low.

CHAS Health

Federally Qualified Health Center delivering primary care to PSH residents and homeless populations; receives HRSA Health Care for the Homeless funding. Not a CoC sub-recipient.

NOFO exposure: none direct, with potential indirect benefit if the rebalance directs additional healthcare-for-homeless dollars through complementary federal lines.

13. Cross-Cutting Observations

Pulling back from the per-organization analysis, three system-level patterns emerge.

1. **PSH in Spokane is a stack, not a single agency.** The CoC supportive services dollars flowing to CCEW and VOA are the layer at greatest risk in the NOFO. But the buildings stand on Spokane Housing Authority project-based vouchers, state Housing Trust Fund capital, City and County recording fees, and Apple Health FCS billing through Frontier Behavioral Health. Pulling the services layer hard enough destabilizes the entire stack, with SHA absorbing operational consequences through declining PBV utilization, FBH absorbing them through eroding billable populations, and partner buildings absorbing them through degraded retention.
2. **The smaller providers are mostly insulated.** Jewels Helping Hands, Revive, CAT, Truth Ministries, Salvation Army, Pioneer, Goodwill, and CHAS have negligible direct CoC exposure. Several may see modest gains if the rebalance routes additional shelter, transitional, and treatment dollars to Spokane through state and local intermediaries. The political narrative of "providers in crisis" should not include these organizations on the same footing as CCEW or even VOA.
3. **The bigger threat to many of these organizations is not the CoC NOFO.** YWCA's most material 2025 cuts came from VAWA, FVPSA, and VOCA. SNAP's biggest exposure is LIHEAP and CSBG. SHA's October 2024 stress event came from HAP shortfalls, not CoC. Family Promise's growth is anchored in city and county. Frontier's risk is strategic, not budgetary. If the public conversation about the NOFO collapses all federal homelessness pressure into one frame, it will misallocate political attention away from the actual line items at risk for each organization.

14. Three Scenarios Across the Cohort

The table below applies the same three-scenario framing used in the CCEW and VOA memos to each organization in this cohort. Mild assumes the NOFO retains a PH cap but congressional renewal triggers protect FY 2025 renewals. Moderate assumes the cap binds with multi-year phase-in. Severe assumes immediate binding with conditions disadvantaging Housing First. The cohort response differs sharply by organization.

Organization	Mild NOFO	Moderate NOFO	Severe NOFO
SHA	Stable HCV and PBV operations; partner stress absorbed quietly.	Rising PBV vacancy on PSH buildings as services degrade; partial reabsorption through tenant-based reissues.	Material PBV utilization decline; possible second 2024-style referral pause if HAP shortfalls compound.
YWCA	DV bonus protects core line; net flat year.	Joint TH-RRH trimmed but DV-specific protected; concurrent VAWA pressure remains the bigger issue.	Further DV apartment closures; staff reductions; capacity decline.
Family Promise	Family RRH renews; emergency shelter expansion continues.	RRH share reduced 10 to 25%; family TH and shelter compensate.	RRH line cut sharply; family rehousing pace slows; longer shelter stays.
SNAP	RRH renews; LIHEAP/CSBG hold.	Modest RRH reduction; LIHEAP/CSBG remains primary worry.	RRH cut combined with LIHEAP/CSBG cut creates compounding stress on Spokane's largest anti-poverty agency.
Frontier Behavioral Health	Steady Medicaid and state contracts.	Partner-PSH services contracts trimmed; some embedded teams scaled back.	Partner buildings reclassified or thinned; FCS billable population erodes.
Salvation Army, Jewels, Revive, CAT, Truth, Goodwill, Pioneer	No material change.	Modest gains as state and city redirect resources toward shelter, TH, and treatment.	Larger gains as remaining homelessness dollars flow to these categories.

15. Mitigations and Open Questions

Likely system-level responses

- WA Department of Commerce backfills federal homelessness retreats — historically the state's pattern; CHG and HTF rounds in 2026 to 27 are the leverage points.
- Spokane Housing Authority deepens project-based voucher commitments to backfill HUD CoC operating subsidy on partner PSH; the November 2024 HUD-VASH PBV RFP is the template.
- Apple Health FCS billing build-out across PSH providers (CCEW, VOA, Frontier, Pioneer, Goodwill, Revive) becomes the structural alternative to HUD CoC services dollars.
- City of Spokane and Spokane County contracts absorb additional shelter, TH, and treatment dollars released by the rebalance — Salvation Army, Jewels, CAT, Family Promise, and Revive are the most positioned to bid.
- Federal advocacy on the parallel cuts: VAWA/FVPSA/VOCA (YWCA), LIHEAP/CSBG (SNAP), federal RHY (VOA), and VA SSVF/GPD (VOA, Goodwill) are arguably bigger material risks than the CoC NOFO for several of these organizations.

Questions to track over the next 60 to 120 days

4. Does the final FY 2026 NOFO actually contain a 30% PH cap, and does it apply to renewals or only new awards?
5. Does the WA-502 Spokane CoC board's local ranking process preserve the YWCA DV bonus, SNAP RRH, and Family Promise RRH lines at full strength?
6. Does Washington Department of Commerce respond with backfill — particularly through expanded CHG family-shelter and PSH operating lines?
7. Does SHA absorb additional CCEW, VOA, or other partner units through expanded PBV commitments?
8. Does federal RHY appropriations move materially in FY26, affecting VOA, and Goodwill SSVF?
9. Does LIHEAP and CSBG hold, or do they face cuts that would compound with NOFO pressure on SNAP?

16. Caveats and Verification Notes

- All percentage and dollar figures in this memo are directional. Where confirmed amounts are cited (Jewels \$1.7M Cannon Street contract, CAT \$200K Mobile MAT, SHA October 2024 referral halt, YWCA \$400K 2025 cuts) those are sourced from public reporting or contract notices.
- Specific WA-502 CoC project line amounts for YWCA, Family Promise, and SNAP could not be extracted from the FY 2023 CoC Press Report PDF in this research pass. The qualitative exposure ratings remain valid; the dollar precision can be tightened with direct review of the WA-502 award letter.
- SHA's exact HUD-VASH, EHV, and Mainstream voucher counts are estimates against the 6,200 household total; the SHA Financial and Federal Single Audit Report 2024 has precise figures.
- Frontier Behavioral Health 2025 staffing rumors were not confirmed in this pass; a direct check with FBH communications would be appropriate before public reliance.
- Goodwill Inland Northwest SSVF and HEN dollar figures are estimates against typical regional scale; direct contract data would refine.
- This memo is the third in a three-part series. CCEW and VOA memos provide the deeper organizational treatment for those two providers.

Sources

Federal policy and NOFO direction

- HUD No. 26-031, HUD Moving Forward on Bold Homelessness Reform — <https://www.hud.gov/news/hud-no-26-031>
- NACo, HUD Temporarily Withdraws CoC NOFO — <https://www.naco.org/news/hud-temporarily-withdraws-continuum-care-nofo-amid-program-uncertainty>
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