

2025 HUD CoC Program NOFO Meeting for: Agencies Seeking Bonus Funding

DISTRICT OF COLUMBIA CONTINUUM OF CARE
NOVEMBER 22, 2025

HUD Continuum of Care Program

Continuum of Care (CoC)

- Per HUD, a **Continuum of Care (CoC)** is a planning body that establishes a community's strategic vision to respond to homelessness in that jurisdiction.
- CoC may also refer to the network of homeless services providers in a community.
- The **CoC Program** is the HUD funding stream associated with this competition (as distinct from ESG, HOPWA, HOME, etc.).
 - The HUD CoC Program is the primary source of federal funding supporting the community's efforts to prevent and end homelessness.
 - Historically, HUD CoC Program funding has been used to:
 - Promote a communitywide commitment to the goal of ending homelessness;
 - Provide funding to support efforts by nonprofit providers and state and local governments to quickly rehouse homeless individuals and families while minimizing the trauma and dislocation caused by homelessness; and
 - Promote access to and effect utilization of mainstream programs by homeless individuals and families.

Roles and Responsibilities for the CoC NOFO Response

The Community Partnership (TCP):

- The Collaborative Applicant and HMIS Lead, TCP is responsible for:
 - Assembling and submitting the Consolidated Application for CoC Program funding to HUD
 - Conducting community info sessions about the NOFO
 - Soliciting Project Applications for “bonus” funding opportunities
 - Providing technical assistance to providers who are renewing funds or applying for new funding
 - Providing the Ranking Committee with HMIS and other data to inform the Project Ranking

DC Interagency Council on Homelessness (ICH) Committee Structure

- The “Continuum of Care” (under the first definition noted on the previous slide); ICH is responsible for:
 - Setting the community’s strategic vision for use of the HUD CoC funding
 - Assembling the Ranking Committee

Roles and Responsibilities

The Ranking Committee

- The Ranking Committee is tasked with articulating the community's funding priorities to HUD by:
 - Reviewing quantitative and qualitative information about each project requesting HUD CoC funding to determine 1) whether it should be included in our Consolidated Application and 2) where it is ranked/prioritized in our request for funding.
 - Those determinations are based on 1) performance data, 2) the proposals' alignment HUD priorities, and 3) other criteria set by the local CoC

No member of the ranking committee may represent an agency applying for HUD CoC Funding.

Project Applicants

- The providers submitting Project Applications to renew, reallocate, transition or establish new funding through the NOFO.

HUD

- Issues the NOFO and makes the ultimate decision about whether a Project Application is funded.

Roles and Responsibilities - Applications

Project Applications

- The Project Application historically includes information on the projects' proposed:
 - Program type
 - Population to be served
 - Description of physical housing space
 - Type of services that will be offered by project/billed to HUD grant
 - Budget requests and match sources
 - *Commitment HUD policy priorities*

Consolidated Application

- The Consolidated Application includes:
 - Information on the local CoC's response to homelessness, the structure of its Board (ICH), system performance, and implementation of *service requirements coordination with other systems (particularly with law enforcement)*
 - The Consolidated Application is submitted with the "Project Listing" – the ranked listing of the Project Applications approved by the Ranking Committee.

Eligible Renewals

- A project and associated HUD CoC funding is eligible to renew under the 2025 NOFO if it has grant that ends in Calendar Year (CY) 2026. These include:
 - Projects that were awarded renewal funding through the 2024 NOFO (even if a contract has not yet been issued by HUD/TCP)
 - Projects that were awarded via previous years' Bonus Opportunities with initial grant terms that expire in CY26.
 - *Note: For HUD purposes, references to FY24 or FY25 NOFOs/grants mean the year in which grant funds were appropriated by Congress and issued through that year's NOFO, not the time frame in which your grants operate. FY24 grant numbers end in a four-digit number that includes "24xx".*
- Existing PSH, RRH, Joint TH/RRH and TH grants are eligible to renew funding through the FY25 NOFO, and the activities eligible to be funded under the existing leasing/rental assistance, supportive services, operating, and administrative budget line items remain the same.
- *A project that is eligible for renewal may request to reallocate or transition their project. As is renewals and other application submissions are subject to approval by the Ranking Committee and funding decisions will be made by HUD.*

Timeline

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- Nov. 21, 22, 24, 2025: Preliminary information sessions held with providers and ICH Ranking Committee members
- Dec. 1, 2025: Ranking Committee to finalize proposed criteria
- Dec. 2, 2025: Providers email TCP with intentions to apply to renew, reallocate or transition grants; ICH Executive Committee meeting (gather community input on NOFO response; approve/amend Ranking Committee criteria)
- Dec. 3-5, 8-11: Application materials trainings and office hours
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- Dec. 29, 2025: Ranking Committee finalizes decisions
- Dec. 30, 2025: Project Applicants informed of Ranking Committee's decisions re: their inclusion in the Consolidated Application's Project Listing and their final rank.
- Jan. 14, 2026: Consolidated Application due to HUD. (Due date listed in the NOFO is 1/14 but it also says that completed package must be posted online 2 days ahead of that.)
- May 2026: HUD expects to make award announcements (no word on grant execution timeline).

Bonus Funding Opportunities

Bonus Project Funding

- The NOFO makes funding available through a CoC Bonus and DV Bonus opportunities.
- Our CoC is eligible for up to \$6.4M under the CoC Bonus and \$2.3M under the DV Bonus.
 - *The CoC Bonus must create brand new inventory or support ancillary CoC work.*
 - *The DV Bonus is for projects that are dedicated to survivors of domestic violence, dating violence, sexual assault, or stalking.*
- Eligible project types under the opportunity include:
 - *CoC Bonus: SSO, SSO-CE, HMIS, PSH, RRH, and TH*
 - *DV Bonus: SSO for Coordinated Entry (CE), RRH, and TH*
- Bonus dollars can also be used to expand/renewing projects (applicants must submit a separate Expansion grant application in addition to the renewal application)
- *See pages 55-64 of the NOFO for more specific information on how new projects will be scored by HUD to determine whether they even be able to be considered for funding.*

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Threshold Requirements

HUD Threshold Requirements

HUD Threshold Requirements: HUD reviews all projects to determine if they meet the eligibility threshold requirements on a pass/fail standard.

In order to ensure its Consolidated Application is competitive as possible, the CoC's Ranking Committee must conduct a similar review of project applications prior to submission to HUD.

The Ranking Committee is unlikely to approve any projects for the Consolidated Application if they do not commit to maintaining these requirements.

If HUD ultimately determines that the applicable standards are not met for a project, the project will be rejected.

HUD Requirements: Match

Match Requirement: HUD CoC Program funding is limited and can provide only a portion of the resources needed to successfully address the needs of homeless families, individuals, and youth. Meaning, HUD does not intend to be the sole support of any project that it funds. Therefore, HUD requires Project Applicants to have other sources of funding.

HUD CoC Program grants must must be matched in an amount equal to 25% of grant funds. Match resources may come from public or private sources. All costs paid for with matching funds must be for activities that are eligible under the CoC Program, even if the recipient is not receiving CoC Program grant funds for that activity.

HUD Requirements: Site Control

Site Control Verification: For new projects where funds are awarded for leasing, rental assistance, operating, and/or supportive services grantees must demonstrate site control within 12 months of the announcement of the award.

Acceptable evidence of site control is a deed, lease, or purchase agreement.

If a grantee fails to gain site control by the deadline, HUD has the right to withdraw funding for the project.

HUD Requirements: Environmental Review

Environmental Review is the process of reviewing a project and its potential environmental impacts to determine whether it meets federal, state, and local environmental standards.

HUD Requirements:

Data Collection & Reporting

Homeless Management Information System (HMIS): Programs funded by the HUD CoC Program are required to use the homeless services system's HMIS to comply with all HUD reporting requirements. As HMIS lead for the CoC, TCP provides access to the HMIS and training on a monthly basis so that providers understand the requirement and data entry standards.

HMIS Comparable Database: The Violence Against Women Act (VAWA) and the Family Violence Prevention and Services Act (FVPSA) contain strong, legally codified confidentiality provisions that limit victim service providers from sharing, disclosing or revealing victims' personally identifying information, including entering information into the HMIS. These provisions underpin confidentiality practices that protect the safety and privacy of victims of domestic violence, dating violence, sexual assault, stalking, and/or human trafficking who are seeking services.

HUD Requirements: CAHP Participation

CAHP/Coordinated Entry Participation: HUD requires that referrals for programs receiving CoC funding come through the community's coordinated entry process, referred to locally as Coordinated Assessment and Housing Placement (CAHP).

- Program participants are matched to and prioritized for housing resources based on a uniform assessment which pairs information about a person or family's service needs with available programs.
- TCP's CAHP team will make referrals into the program as vacancies arise.

Post Award Requirements

- The NOFO provides a thorough accounting of the provisions that are applicable from various pieces of federal legislation and Executive Orders; this begins on page 107, and more detail is available at hud.gov/sites/dfiles/CFO/documents/Administrative-Requirements-Addendum-FY2025.pdf
- Requirements regarding Environmental Reviews, Remedies for Non-Compliance, and Reporting are included.
- TCP will continue to pass on information through provider meetings and trainings and will coordinate with subgrantees on areas of shared responsibility (e.g. Field Office monitoring visits).

The FY25 NOFO:

- **Places a 30 percent cap on requests for Permanent Housing (PH) programs.** *No more than 30% of a CoC's total ask in 2025 can be for PH programs (the NOFO defines "PH" as Permanent Supportive Housing (PSH), Rapid Rehousing (RRH), and Joint Transitional-Rapid Rehousing (TH/RRH)). Organizations funded by the 2024 competition are eligible to apply to renew, HUD is encouraging reallocation of PH where possible to create the program types mentioned above to round out the remaining portion of the ask.*
- **Sets a 30 percent "Tier 1" threshold.** Tier 1 is list of programs – either new or renewal – that the CoC asks HUD to prioritize when making funding decisions.
 - *Our CoC's Tier 1 threshold is just under \$9.7M (equal to 30% of the CoC's "annual renewal demand" or ARD - the total dollar amount received following the FY24 NOFO (\$32.2M).*
 - *Tier 2 is roughly \$31.4M, the amount is equal to the remaining 70% of ARD plus the amount of any Bonus we are eligible to receive (CoC Bonus: \$6.4M; DV Bonus: \$2.3M).*
- **Changes the goals and objectives for projects funded by the HUD CoC Program.** *As HUD indicated this summer, the Department is focused on new areas such as promoting self-sufficiency and redefined existing priorities such as ending unsheltered homelessness. A complete set of the new priorities and associated definitions are listed on pages 12 and 13 of the NOFO.*
- **Changes post-award requirements for grantees.** *HUD outlined an expanded list of requirements for grantees funded in 2025 in the NOFO; TCP is encouraging agencies applying for funding to review this section with particular attention paid to the items on pages 107-109.*

FY25 NOFO:

- *Projects seeking funding under the NOFO must attest that they will not use racial preferences “or other forms of discrimination” and HUD will review available information to determine whether the project has engaged in activities that “violate the sex binary in humans.”*
- *Projects funded may not operate safe consumption sites, allow illegal drug use in properties under their control, or engage in “harm reduction.”*
- *Heavily emphasizes service participation requirements and gives prioritization for communities with local laws that prohibit public illicit drug use and public “camping.”*
- *Includes preference points for the CoC if all recipients/subrecipients will attest to that they are verifying the immigration status of program participants.*
- *Includes preference points activities that happen within Opportunity Zones - the program aims to encourage long-term private investment and stimulate economic development in underserved urban and rural areas.*
- *While alignment with HUD policy priorities and a NOFOs goals and objectives has always been a part of the process, the FY25 NOFO will review for whether projects have a history of “subsidizing or facilitating activities that conflict with the purpose of the this NOFO.”*

HUD Goals and Objectives

- The NOFO establishes goals and objectives, and HUD expects that CoCs will include projects in the CoC's Consolidated Application that prioritize the following:
 - *Ending the crisis of homelessness in our streets*
 - *Prioritizing treatment and recovery*
 - *Advancing public safety*
 - *Promoting self-sufficiency*
 - *Improving outcomes*
 - *Minimizing trauma*
- HUD seeks to have programs funded through the NOFO to adhere to these by implementing service requirements, having participants work toward economic gains to exit to housing on their own, and greater partnership with law enforcement.
- These are defined on pages 12 and 13 of the NOFO, and TCP encourages all applicants to review them in detail.
- *Project and Consolidated Application materials are not available yet (as of 11/19), but it will also be important to review those for information on how exactly we will be tasked with responding to the above.*

Ranking

- HUD requires that new and renewing project applications are submitted in a ranked order. The Ranking signals to HUD what the community priorities are for which programs they should fund if they are not able to fund our entire request (or all requests nationally).
- The Ranking must include a combination of quantitative and qualitative factors and should include objective, performance criteria and whether projects meet basic threshold requirements to be considered.
- The Ranking Committee must be made up of non-conflicted community stakeholders – meaning members of the Ranking Committee cannot come from government agencies or service providers seeking new or renewal funding in the competition.
- *The Ranking Committee will prioritize grants based on 1.) Performance data; 2.) Supplemental narrative information submitted by project applicants; and 3.) How closely each project aligns with HUD's priorities.*
- By Dec 30, TCP will let providers applying for new and renewal funding whether their project was accepted by the CoC and where it is ranked, if needs to be reduced or modified, or whether it was rejected.

Ranking

- HUD is more prescriptive in the FY25 NOFO about the criteria CoCs must use alongside any local criteria. 50% of the points used must be awarded using past performance data and/or plans to address:
 - Returns to Homelessness
 - Increases in income from employment
 - Service participation requirements
- Along with these the Ranking Committee is considering:
 - Housing stability
 - Utilization rate
 - Information on key subpopulations served by programs, how feedback from persons with lived experience are incorporated into program design/operations, and alignment with new HUD “goals and objectives”
 - Additional narrative from providers addressing successes/challenges in the last year and other information the provider would like the committee to be aware of.

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Questions?

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