

2025 HUD CoC Program NOFO Meeting for: Agencies Renewing Funding

DISTRICT OF COLUMBIA CONTINUUM OF CARE
NOVEMBER 21, 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
- **Dec. 12, 2025:** Project Application materials (new and renewal) due to Ranking Committee via TCP
- **Dec. 15, 2025:** Project Application materials due to HUD; TCP enters all application material into e-snaps.
- **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

Changes for FY2025

The FY25 NOFO:

- **Rescinds and supersedes any commitments about FY25 funding** made in the FY24-25 NOFO. *HUD has not made any changes to funding commitments from last year's competition though grants are subject to any (new) requirements that are articulated in your HUD grant agreement or contract with TCP.*
- **Does not change who is eligible to receive services from projects funded by the NOFO and all program types (PSH, RRH, Joint TH/RRH, TH) that currently receive funding under the HUD CoC program are eligible to renew as is.**
- **Changes eligible program types that may receive new project funding.** *HUD is encouraging CoCs to establish Transitional Housing (TH) programs and Supportive Services Only (SSO) grants either by using Bonus funds or by reallocating existing grants.*
- **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)).*

FY25 NOFO:

- **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.
- **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.”**

FY25 NOFO:

- 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.

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).

Renewal Grants

- Renewing grants are applying for another one-year grant to term to keep the existing project “as is.”
- Once application materials are available, TCP will host trainings on completing renewal applications.
- In addition to the changes applicable to all projects funded under the NOFO (see previous slides), renewing grantees should be aware that:
 - **YHDP grants** will be competitively renewed (they previously only needed to be approved for inclusion in the application by the Ranking Committee but will now be included in the tiered ranking).
 - **Joint TH/RRH** projects may only request leasing dollars for the site in which the TH portion is implemented and may only request rental assistance for the RRH component
 - **PSH grants** should ensure that the project designated as a Dedicated Plus program
- In addition to the CoC’s ranking process, which will determine whether a project is included in the Consolidated Application and where it is ranked, HUD will review information on the existing grant from the Field Office, previously submitted APRs, and financial information in LOCCS, and may need to submit information from the provider agency’s most recently completed financial audit.

Transition & Reallocation Grants

- HUD is encouraging CoCs to establish Transitional Housing (TH) programs and Supportive Services Only (SSO) grants either by using Bonus funds or by transitioning/reallocating existing grants.
- Transition or Reallocation grants move funding from an eligible renewal to create a new program under the allowable types (PSH, RRH, TH, SSO, HMIS, or CES). *Once funding is reallocated (and approved by HUD), it is only renewable in the reallocated format. If funded, the project that funding was reallocated to will be eligible to renew through the FY26 NOFO.*
- The process varies based on how the project was funded using CoC, DV Bonus or YHDP funds and projects may not reallocate from one funding sub-stream to another (e.g. YHDP must reallocate to a project allowed under YHDP).

Transition Grants

- A Transition Grant – as distinct from a Reallocation grant – allows for the opportunity to “transition” renewal from one program type to another over a 1-year period (*while Reallocation is immediate upon the beginning of the next funding cycle*).
- Transition grants awarded through the FY25 NOFO must complete the transition to the new program type by the end of a 1-year (FY25) grant term, and the grant will be renewable through the FY26 NOFO as the new program type.
- Transition grants must be approved by the Ranking Committee; whether the Transition Grant period is approved is determined by HUD.
- **DV renewals are not eligible to use the Transition grant process; YHDP are not eligible either but may apply for a YHDP Replacement Grant.**

Reallocations & Transition Grants

- Consider your existing program type, current program occupancy rate and participants, ability to adopt service requirements, grant configuration, physical housing type (scattered site vs. site-based), when determining whether transition/reallocate grants, e.g.:
 - Joint TH/RRH or RRH to TH
 - PSH to SSO
- Eligible project types to transition/reallocate to depends on how the funding for the original project was awarded:
 - DV Bonus funds: SSO for Coordinated Entry (CE), RRH, and TH (reallocation only)
 - CoC Program funds: SSO, SSO-CE, HMIS, PSH, RRH, and TH
 - YHDP funds: TH, Crisis Residential TH, SSO, SSO-CE, HMIS (replacement only)

Transitional Housing

- Transitional Housing provides time-limited stable housing with services to prepare participants for self-sufficiency.
 - May be site-based or transition-in-place (scattered site)
- HUD will review applications for new TH projects using the evaluation criteria below (projects must receive 7 of 10 points to be considered):
 - ✓ Demonstrate that the project will **provide and/or partner with other organizations to provide eligible supportive services** that are necessary to assist program participants to obtain and maintain housing (2pts).
 - ✓ The applicant has **prior experience operating transitional housing or other projects that have successfully helped homeless individuals and families exit homelessness within 24 months** (1pt).
 - ✓ The applicant has previously operated or currently operates transitional housing or another homelessness project, or **has a plan in place to ensure, that at least 50 percent of participants exit to permanent housing within 24 months and at least 50 percent of participants exit with employment income as reflected in HMIS or another data system** used by the applicant (1pt).
 - ✓ **The project will be supplemented with resources from other public or private sources**, that may include mainstream health, social, and employment programs such as Medicare, Medicaid, SSI, and SNAP (1pt).
 - ✓ Demonstrate that the **proposed project will require program participants to take part in supportive services** (e.g. case management, employment training, substance use treatment, etc.) **by attaching a supportive service agreement (contract, occupancy agreement, lease, or equivalent)**(2pts).
 - ✓ Demonstrate that the **proposed project will provide 40 hours per week of customized services for each participant** (e.g. case management, employment training, substance use treatment, etc.)(2pts).
 - ✓ The 40 hours per week may be reduced proportionately for participants who are employed.
 - ✓ The 40 hours per week does not apply to participants over age 62 or who have a physical disability/impairment or a developmental disability (24 CFR 582.5) not including substance use disorder.
 - ✓ Demonstrate the **average cost per household served for the project is reasonable**, consistent with 2 CFR 200.404(1pt).

Transitional Housing

- Proposed Transitional Housing projects must also:
 - Demonstrate the financial and management capacity and experience to carry out the project as detailed in the project application and the capacity to administer federal funds.
 - Submit the required certifications specified in this NOFO.
 - Serve a population that meets program eligibility requirements as described in the NOFO.
 - Participate in a local HMIS system or DV HMIS Comparable Database
 - Project applicants must certify affirmatively to the following:
 - The project applicant **will not** engage in racial preferences or other forms of illegal discrimination.
 - The project applicant **will not** operate drug injection sites or “safe consumption sites,” knowingly distribute drug paraphernalia on or off 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.”

Supportive Services Only

- There are multiple allowable Supportive Services Only (SSO) grants including standalone supportive services projects, street outreach, coordinated entry, and HMIS grants.
- HUD will review standalone SSO grants using the evaluation criteria below (projects must receive 4 of 5 points to be considered):
 - ✓ The Supportive Services project is necessary to assist people in exiting homelessness and increasing self-sufficiency and the Recipient will conduct an annual assessment of the service needs of the program participants (1pt).
 - ✓ The proposed project has a strategy for providing supportive services to eligible program participants including those with histories of unsheltered homelessness and those who do not traditionally engage with supportive services (2pts).
 - ✓ The project will be supplemented with resources from other public or private sources, that may include mainstream health, social, and employment programs such as Medicare, Medicaid, SSI, and SNAP (1pt).
 - ✓ The services provided are cost-effective consistent with 2 CFR 200.404 (1pt).
- HUD will review outreach SSO grants using the evaluation criteria below (projects must receive 5 of 6 points to be considered):
 - ✓ The project will be supplemented with resources from other public or private sources, that may include mainstream health, social, and employment programs such as Medicare, Medicaid, SSI, and SNAP (1pt).
 - ✓ The proposed project has a strategy for providing supportive services to eligible program participants including those with histories of unsheltered homelessness and those who do not traditionally engage with supportive services (2pts).
 - ✓ The applicant has a history of partnering with first responders and law enforcement to engage people living in places not meant for human habitation to access emergency shelter, treatment programs, reunification with family, transitional housing or independent living. The applicant must cooperate, assist, and not interfere or impede with law enforcement to enforce local laws such as public camping and public drug use laws (1pt).
 - ✓ The applicant has experience providing outreach services consistent with the activity description at 24 CFR 578.53(e)(13) and has demonstrated effectiveness at helping people successfully exit from places not meant for human habitation to emergency shelter, treatment programs, transitional housing or permanent housing programs (1pt).
 - ✓ The services provided are cost-effective consistent with 2 CFR 200.404 (1pt).

Bonus Project Funding

- The NOFO also makes funding available through a CoC Bonus and DV Bonus opportunities.
- This is funding on top of the CoC's annual renewal demand and must be accounted for in our Tier 1/Tier 2 ranking whether it is applied for or not.
- In the FY25 NOFO our CoC is eligible for \$6.4M under the CoC Bonus and \$2.3M under the DV Bonus.
 - The DV Bonus is for projects that are dedicated to survivors of domestic violence, dating violence, sexual assault, or stalking.
 - The CoC Bonus must create brand new inventory or support ancillary CoC work.
- Eligible project types under the opportunity include:
 - DV Bonus: SSO for Coordinated Entry (CE), RRH, and TH
 - CoC Bonus: SSO, SSO-CE, HMIS, PSH, RRH, and TH
 - New YHDP programs cannot be created using the Bonus Opportunities
- 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 will be funded.

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.

CoC Scoring

- CoC Coordination & Engagement, 81 pts
 - Adds points for availability of treatment and recovery sites, requirements for service participation, coordination with law enforcement, and reduction of encampment sites while removing or reducing points for Housing First Implementation, coordination with PHAs, increasing RRH, etc.
- Project Capacity, Review, and Ranking, 9pts
 - Increases score for how CoC incorporates project performance on key SPMs into ranking while eliminating points awarded for incorporating past HUD policy priorities into ranking process
- System Performance Measures, 40 pts
 - Continues focus on performance of CoC wide SPMs but changes point values associated with meeting various Department goals for performance
- Sections on HMIS and PIT implementation and Coordination with Health Care organizations eliminated

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