

FY 2024-25 Continuum of Care Notice of Funding Opportunity (CoC NOFO) Summary

Table of Contents

Noteworthy Changes.....	2
Background	3
Important HUD-Required Dates	3
Funding Available for Our CoC	4
2022-2026 HUD Strategic Goals	4
2024 HUD CoC Policy Priorities	5
Application Structure	8
Review and Rank Changes and Reminders	8
Eligible New Projects	10
<i>Eligible Types of New Projects Created Through Bonus or Reallocated Funding</i>	12
<i>Eligible Types of New Projects Created Through Domestic Violence (DV) Bonus</i>	13
Important Points for Renewal Projects	15
<i>Youth Homelessness Demonstration Program (YHDP) Renewals</i>	16
Important Points for All Project Applicants.....	17
Community-Level Changes and Reminders	17
Resources	20

Noteworthy Changes

- **Tier 1 is smaller this year**, equal to **90%** of the CoC's Annual Renewal Demand (ARD). Tier 1 was 93% of ARD in 2023.
- **This is a 2-year NOFO.** This NOFO will cover Fiscal Years 2024 and 2025. Pp. 22-25.
 - **2024 NOFO process:** The application and selection process for the FY 2024 funds (CoC and YHDP) will proceed much like it has in prior-year competitions. The Collaborative Applicant must submit the CoC Application, any new and renewal projects, and Planning Grant application.
 - **2025 NOFO process:** CoCs are only required to submit one CoC application that will be applicable to the FY 2024 and FY 2025 funds. HUD reserves the right to award available FY 2025 funds (the FY 2025 CoC program and YHDP funds) based on this NOFO competition.
 - **CoC Application:** The Collaborative Applicant (CA) is not required to submit a CoC Application in FY 2025. CoC Applications will not be accepted in 2025, but the CA must submit an application for 2025 funding.
 - Collaborative Applicant and UFAs will be required to submit at least the following in order to qualify for 2025 funds:
 - FY 2025 Renewal project applications for grants that were not funded in FY 2024 that have an expiration date in CY 2026 (between January 1, 2026, and December 31, 2026);
 - Applications for projects created through the reallocation of eligible CoC renewal (including DV Renewal) grants and through the replacement of eligible YHDP renewal grants which also includes YHDP Reallocation;
 - FY 2025 Project Priority Listing that includes all projects approved by the CoC to apply for FY 2025 funding; and,
 - A signed HUD-2991 – does not need to include projects that were funding in 2024 and are continuing in 2025.
 - **Project applicants:**
 - Projects awarded in FY 2024 may be eligible for FY 2025 funding based on the applications submitted in 2024 and are not required to apply for renewal in 2025. P. 4
 - For FY 2025, CoC/YHDP projects that are not eligible for renewal in 2024, but are eligible in 2025, and **new** CoC/YHDP projects created through reallocation/replacement will need to submit project applications in e-snaps by August 29, 2025. P. 4.
 - If additional funding becomes available for FY 2025, HUD may amend the NOFO and award funds based on 2024 competition scores.
 - If the amount of funds available in FY 2025 decreases, HUD will reduce awards proportionately.
 - UFAs and High-Performing Communities will maintain their designation for the FY 2025 funding process.
- **DV and YHDP Reallocated funds must serve the same population:** For the FY 2024 funds, HUD requires funding reallocated from projects previously funded with YHDP/DV funds to be used to serve the same population.
- **Special YHDP Activities:** YHDP renewal and replacement projects may submit applications that include special YHDP activities that are otherwise ineligible under the CoC Program. The full list of Special YHDP activities, see NOFO page 50.

- **Cost of living adjustment for conditionally selected grants:** HUD is authorized to make reasonable cost of living adjustments to renewal applications to offset the increase in the cost of operation due to inflation.
- **CoC Bonus amounts for new projects are higher**, equal to 12% of the Annual Renewal Demand (ARD), up from 7% in 2023.
- **DV Bonus amount for new projects** is 15% of the Preliminary Pro Rata Need (PPRN) or \$50,000, whichever is greater.

Background

The U.S. Department of Housing and Urban Development (HUD) has released a Notice of Funding Opportunity (NOFO), signifying the beginning of a funding competition among approximately 450 Continuums of Care (CoCs), the community stakeholder groups that guide local responses to homelessness. The 2024 CoC NOFO was released on July 31, 2024, opening the competition making available **approximately \$3.5 billion nationally** to serve people experiencing homelessness. The information in the NOFO sets forth the competition rules and processes for 2024. Of note, CoCs are only required to submit one CoC Application that will be applicable to both FY 2024 and FY 2025 funds.

The CoC Program (24 CFR part 578) is designed to promote a community-wide commitment to the goal of ending homelessness; to provide funding for efforts by nonprofit providers, states, Indian Tribes or tribally designated housing entities (as defined in section 4 of the Native American Housing Assistance and Self-Determination Act of 1996 (25 U.S.C. 4103) (TDHEs)), and local governments to quickly rehouse homeless individuals, families, persons fleeing domestic violence, dating violence, sexual assault, and stalking, and youth while minimizing the trauma and dislocation caused by homelessness; to promote access to and effective utilization of mainstream programs by homeless individuals and families; and to optimize self-sufficiency among those experiencing homelessness. Before the application is submitted to HUD, the CoC is required to hold a local competition to determine which projects will be included in the consolidated application, along with their relative priority. The results of the local competition dictate which projects the CoC will seek to fund.

This summary includes the highlights of the FY 2024 CoC NOFO. New or revised policies relating to the FY 2024 CoC Program Competition are indicated as ****NEW IN 2024**** and ****REVISED IN 2024****, respectively. Additional information about project application requirements and standards will be available locally.

Details about anything in this summary can be found in the NOFO, available at:
<https://www.grants.gov/search-results-detail/355762>

Important HUD-Required Dates

- **July 31, 2024** -> FY 2024-2025 CoC Program NOFO is released.
- On or before **September 30, 2024** (30 days prior to submission deadline) -> All project applications must be submitted to the CoC.
- On or before **October 15, 2024** (15 days prior to submission deadline) -> The CoC must notify, in writing outside of *e-snaps*, all project applicants who submitted their project applications to the CoC by the CoC-established deadline whether their project application(s) will be accepted and ranked on the CoC Priority Listing, rejected, or reduced by the CoC.
- On or before **October 28, 2024** (2 days prior to submission deadline) -> CoC must post on their website (or a partner's website) all parts of the CoC Consolidated Application, including the CoC Application attachments and the Priority Listing, and notify community members and key stakeholders that the CoC Consolidated Application is available.

Submission Deadline for 2024 Consolidated Application:

Wednesday, October 30, 2024, at 8:00 PM EDT / 7:00 PM CDT / 5:00 PM PDT

- HUD strongly suggests that Collaborative Applicants print a copy of the Submission Summary form from the CoC Application and the FY 2024 CoC Priority Listing before closing their internet browser after the CoC Consolidated Application has been submitted by HUD. This is the Collaborative Applicant's receipt of submission and proof of compliance with the application deadline.
- HUD may issue more than one conditional funding announcement.
- **September 30, 2026** -> FY 2024 CoC Program Funding must be obligated.
- **September 30, 2027** -> FY 2025 CoC Program Funding must be obligated.
- **September 30, 2031** -> FY 2024 obligated funds must be expended.
- **September 30, 2032** -> FY 2025 obligated funds must be expended.

Funding Available for Our CoC

This year, in our CoC, the eligible application amounts are **estimated** as follows (HUD will provide a report with the actual amounts):

- **Tier 1** (90% of Annual Renewal Demand - Annual Renewal Amounts of YHDP Renewal/Replacement Projects): \$1,784,469
- **Tier 2** (remainder of Annual Renewal Demand + CoC Bonus): \$436,204
- **CoC Bonus:** \$237,929
- **Domestic Violence (DV) Bonus:** \$249,150
- **CoC Planning:** \$99,137

2022-2026 HUD Strategic Goals

HUD's FY 2022-2026 Strategic Plan sets the direction and focus of programs and staff and lays out this administration's strategy for ensuring everyone has an affordable, healthy place to live. Over the course of the next three years HUD will continue pursuing two overarching priorities focused on **increasing equity** and **improving customer experience** across all HUD programs. The five strategic goals of the plan remain the same, however, HUD indicated that the following goals from the plan are applicable to the 2024 NOFO:

- Support Underserved Communities
- Ensure Access to and Increase the Production of Affordable Housing
- Promote Homeownership
- Advance Sustainable Communities

HUD expects CoCs to consider the policy priorities established in the strategic goals, the policy priorities established in this NOFO, and local priorities to determine the ranking of new and renewal project application requests.

Projects selected for funding will be expected to establish a plan to track progress related to those goals, objectives, and measures. HUD will monitor compliance with the goals, objectives, and measures.

2024 HUD CoC Policy Priorities

The work funded through this NOFO will support the actions and strategies proposed within the six pillars of the [2022 USICH Federal Strategic Plan to Prevent and End Homelessness](#):

- Equity
- Data and evidence
- Collaboration
- Housing and Supports
- Crisis Response
- Prevention

CoCs will be evaluated based on the extent to which they further HUD's policy priorities. The policy priorities listed this year remain the same from the 2022 NOFO; however, **there is an emphasis on including people who are currently or have previously experienced homelessness to be included in the local planning process.**

1. Ending homelessness for all persons

- To end homelessness, CoCs should identify, engage, and effectively serve all persons experiencing homelessness.
- CoCs should measure their performance based on local data that consider the challenges faced by all subpopulations experiencing homelessness in the geographic area (e.g., veterans, youth, families, or those experiencing chronic homelessness, and people with disabilities, including those living with HIV/AIDS).
- CoCs should partner with housing, health care, and supportive services providers to expand housing options, such as permanent supportive housing, housing subsidies, and rapid rehousing.
- Additionally, CoCs should use local data to determine the characteristics of individuals and families with the highest needs and longest experiences of homelessness to develop housing and supportive services tailored to their needs.

2. Use a housing first approach

- Housing First prioritizes rapid placement and stabilization in permanent housing and does not have service participation requirements or preconditions. CoC Program funded projects should help individuals and families move quickly into permanent housing, and CoCs should measure and help projects reduce the length of time people experience homelessness.
- Additionally, CoCs should engage landlords and property owners to housing units available for rapid rehousing and permanent supportive housing participants, remove barriers to entry, and adopt client-centered service methods.
- HUD encourages CoCs to assess how well Housing First approaches are being implemented in their communities.

3. Reducing unsheltered homelessness

- In recent years, the number of people experiencing unsheltered homelessness has risen significantly, including a rising number of encampments in many communities across the

country. People living unsheltered have extremely high rates of physical and mental illness and substance use disorders.

- b. CoCs should explore all available resources, including CoC and ESG funded assistance, housing subsidies, health care programs, and supportive services to help improve unsheltered people's well-being and help them move as quickly as possible into permanent housing.
- c. ****NEW IN 2024**** CoCs should work with law enforcement and their state and local governments to enlist their support for housing people in encampments, and to avoid practices that criminalize homelessness. Criminalization of homelessness risks the health of people living unsheltered and makes it more difficult for them to move into permanent housing.
- d. Additionally, CoCs should use their Coordinated Entry process to promote participant choice, coordinate homeless assistance and mainstream housing and services, and ensure people experiencing homelessness receive assistance quickly.

4. Improving system performance

- a. CoCs should be using system performance measures (e.g., average length of homeless episodes, rates of return to homelessness, rates of exit to permanent housing destinations) to determine how effectively they are serving people experiencing homelessness.
- b. CoCs should review all projects eligible for renewal under this FY 2024-2025 NOFO to determine their effectiveness in serving people experiencing homelessness, including cost-effectiveness. The CoC Competition includes several options to help CoCs improve their effectiveness, including reallocation, expansion, and transition grants.
- c. CoCs should also look for opportunities to implement continuous quality improvement and other process improvement strategies.

5. Partnering with housing, health, and service agencies

- a. Using cost performance and outcome data, CoCs should improve how all available resources are utilized to end homelessness.
- b. HUD encourages CoCs to maximize the use of mainstream and other community-based resources when serving persons experiencing homelessness and to:
 - (1) ****REVISED IN 2024**** Work closely with health care systems and agencies and assist program participants to receive health care and supportive services, including behavioral health services, including those covered and financed by Medicaid. This includes developing close partnerships with public health agencies to analyze data and design approaches that reduce homelessness, improve the health of people experiencing homelessness, and prevent and address disease outbreaks, including HIV/AIDS.
 - (2) Partner closely with PHAs and state and local housing organizations to utilize coordinated entry, develop housing units, and provide housing subsidies to people experiencing homelessness. These partnerships can also help CoC Program participants exit permanent supportive housing through Housing Choice Vouchers and other available housing options. CoCs and PHAs should especially work together to implement targeted programs such as Emergency Housing Vouchers, HUD-VASH, Mainstream Vouchers, Family Unification Program Vouchers, Fostering Youth Independence Vouchers, and other housing voucher programs targeted to people experiencing homelessness. CoCs should coordinate with their

state and local housing agencies on the utilization of new HOME program resources provided through the Homelessness Assistance and Supportive Services Program that was created through the American Rescue Plan.

- (3) **** NEW IN 2024**** CoCs should also work with other organizations administering other housing assistance, such as assistance provided through HUD's Section 202 and 811 programs, HUD's Project Based Rental Assistance, and U.S. Department of Agriculture's housing assistance programs.
- (4) Partner with local workforce development centers to improve employment opportunities.
- (5) Work with tribal organizations to ensure that Tribal members can access CoC-funded assistance when a CoC's geographic area borders a Tribal area.

6. Racial equity

- a. In nearly every community, Black, Indigenous, and other people of color are substantially overrepresented in the homeless population. HUD is emphasizing system and program changes to address racial equity within CoCs and projects.
- b. Responses to preventing and ending homelessness should address racial inequities to ensure successful outcomes for all persons experiencing homelessness using proven approaches, such as: developing a coordinated community response created in partnership with a racially diverse set of stakeholders and people experiencing homelessness and partnering with organizations with experience serving underserved populations.
- c. ****REVISED IN 2024**** CoCs should review local data, policies, procedures, and processes to determine where and how to address racial disparities affecting individuals and families experiencing homelessness and take steps to eliminate barriers to improve racial equity and address disparities.

7. Improving assistance to LGBTQ+ individuals

- a. Discrimination on the basis of gender identity or sexual orientation manifests differently for different individuals and often overlaps with other forms of prohibited discrimination. CoCs should address the needs of LGBTQ+, transgender, gender non-conforming, and non-binary individuals and families in their planning processes.
- b. Additionally, when considering which projects to select in their local competition to be included in their application to HUD, CoCs should ensure privacy, respect, safety, and access regardless of gender identity or sexual orientation in projects.
- c. CoCs should also partner with organizations with expertise in serving LGBTQ+ populations.

8. ****REVISED IN 2024**** Persons with lived experience

- a. The people who know best what solutions will effectively end homelessness are those who are experiencing homelessness.
- b. HUD expects CoCs to include people who have lived homeless expertise and experience in their local planning and decision-making processes.

- c. People with lived experience/expertise should determine how local policies may need to be revised and updated to improve the effectiveness of homelessness assistance programs, including participating in planning and oversight activities and developing local competition processes, monitoring and evaluation.
- d. CoC leaders and stakeholders should prioritize hiring people who have experienced homelessness in areas where their expertise is needed (e.g., peer outreach and support).

9. ****NEW IN 2024** Building an Effective Workforce**

- a. Homeless assistance providers need effective, well- supported staff to provide high quality assistance but recruiting and retaining qualified staff for programs to assist persons experiencing homelessness has proven difficult due to low pay and the challenging nature of the work.
- b. HUD is applying cost of living adjustments to supportive service activities and other staffing-focused budget lines to allow CoC budgets to better keep up with rising costs.
- c. HUD also encourages CoCs to work with their funders and other community stakeholders to improve pay and support for people who work in the homelessness sector.

10. **Increasing affordable housing supply**

- a. The lack of affordable housing is the main driver of homelessness. CoCs play a critical role in educating local leaders and stakeholders about the importance of increasing the supply of affordable housing and the specific consequences of the continued lack of affordable housing.
- b. CoCs should be communicating with jurisdiction leaders, including for the development of Consolidated Plans, about the harmful effects of the lack of affordable housing, and they should engage local leaders about steps such as zoning and land use reform that would increase the supply of affordable housing.
- c. This FY2024-2025 CoC NOFO awards points to CoCs that take steps to engage local leaders about increasing affordable and accessible housing supply.

Application Structure

The CoC Consolidated Application is made up of three parts:

1. **CoC Application** provides information about the CoC planning body, governance structure, overall performance, and the strategic planning process. This part of the application is scored and will determine the order in which CoCs are funded.
2. **Project Applications** are completed in e-snaps by agencies applying for projects.
3. **CoC Priority Listing** ranks all project applications in order of priority.

Review and Rank Changes and Reminders

****NEW**** Projects that are awarded FY 2024 funds may be eligible for award of FY 2025 funds using their FY 2024 application submission and are not required to apply for renewal for FY 2025 funds. In 2025, renewal projects that were not eligible for renewal in FY 2024 and new projects created through reallocation will be required to submit an e-snaps application.

****NEW**** YHDP Renewal and Reallocation projects are non-competitive and must not be ranked by the CoC; HUD removed language from the 2023 NOFO that had some YHDP projects compete depending on the YHDP Round in which they were awarded. HUD will select YHDP projects for funding if they pass project eligibility and project quality threshold review.

CoCs should consider the policy priorities established in this NOFO in conjunction with local priorities to determine the ranking of new and renewal project application requests.

Performance-Based Decisions: Requests for new CoC project applications, except for new projects created through reallocation, are not allowed unless the CoC evaluates and competitively ranks projects based on how they improve the CoC's system performance as outlined in section V.B.2.b of this NOFO. HUD will prioritize funding for CoCs that have demonstrated the capacity to reallocate funding from lower to higher-performing projects.

****NEW** YHDP and DV Reallocations:** Project funds previously designated for DV or YHDP programs can only be reallocated to serve the same population.

Applications for YHDP Renewal, YHDP Replacement, CoC Planning, and if applicable, UFA Costs projects are not competitively ranked and therefore must be excluded from CoC ranking. These non-competitive applications are also excluded from the Tier 1 and Tier 2 selection process and are not part of ARD.

DV Projects ranking: If a DV Bonus project ranked in Tier 1 is selected with DV Bonus funds, HUD will remove the project from the FY 2024 Priority Listing and move the projects below it up one rank position. However, if HUD does not select a new DV Bonus project in the initial DV Bonus selection, the project will retain its ranked position in the Tier 1 selection process. Projects not selected through DV selection process will be funded with CoC funds, not DV funds. HUD will conditionally select new DV Bonus projects (including new DV Bonus projects that are part of an expansion) that pass project eligibility and project quality threshold in accordance with the criteria established in this NOFO.

Tier 1

- Tier 1 is equal to 90% of the CoC's Annual Renewal Demand minus the sum of all non-competitive YHDP Renewal and YHDP Replacement projects.
- Tier 1 projects will be conditionally selected for funding provided the project applications pass both eligibility and threshold review, and if applicable, project renewal threshold.
- In the event insufficient funding is available under the NOFO to award all Tier 1 projects, Tier 1 will be reduced, which could result in some Tier 1 projects falling into Tier 2. Therefore, CoCs should carefully determine the priority and ranking for all project applications in Tier 1 as well as Tier 2.

Tier 2

- Tier 2 is the difference between Tier 1 and the maximum amount of CoC Renewal (including DV Renewal), CoC Reallocation, DV Bonus, DV Reallocation, and CoC Bonus funds that a CoC applies for.
- Project applications placed in Tier 2 will be assessed for project eligibility and project quality threshold requirements, and if applicable, project renewal threshold requirements.
- Projects in Tier 2 are less likely to be funded, and every Tier 2 project will be scored using a 100-point scale based on three factors:
 - **CoC Score.** Up to 50 points will be awarded in direct proportion to the score received on the CoC Application.

- **CoC Project Ranking.** Up to 40 points will be assigned directly related to the CoC's ranking of the project application(s).
- **Commitment to Housing First.** Up to 10 points will be awarded based on the project application's commitment to follow a Housing First approach that prioritizes rapid placement and stabilization in permanent housing that does not have service participation requirements or preconditions (such as sobriety or a minimum income threshold). Dedicated HMIS projects and coordinated entry SSO projects will automatically receive 10 points.

Important CoC Strategy Reminders

- HUD will not award funds to a new project unless the project was created through reallocation or bonus funds and the CoC has demonstrated to HUD's satisfaction that projects are evaluated and ranked based on the degree to which they improve the CoC's system performance as outlined in sections I.A.4.b (4) and V.B.2.b of the NOFO.
- HUD will prioritize funding for CoCs that have demonstrated the capacity to reallocate funding from lower to higher-performing projects.
- CoCs may only reallocate eligible renewal projects that have previously been renewed under the CoC Program.

Eligible New Projects

- CoCs may apply for new projects created through reallocation, or created through DV Bonus, CoC Bonus, CoC Reallocation, DV Reallocation, YHDP Replacement including YHDP Reallocation, or a combination of reallocation and CoC Bonus.
- To receive funding for a new CoC project, except those created through reallocation, HUD must determine the CoC has demonstrated that projects are evaluated and ranked based on the degree to which they improve the CoC's system performance [See more information on System Performance in sections I.A.4.b.(4) and V.B.2.b of this NOFO].
 - Because new project applications may be created through the reallocation or CoC Bonus processes, if HUD determines that a project applicant or a CoC incorrectly classified one or more new projects as reallocation or CoC Bonus, HUD may reclassify the project(s) as either reallocation or CoC Bonus if the CoC exceeded either its reallocation or CoC Bonus amount.
 - If a project applicant uses both reallocation and CoC Bonus amounts to create a single new project but did not have enough available from either source, HUD will reduce the project to the amount available, if any.
- HUD will review all new project applications to determine if they meet project quality threshold requirements. See pp. 54-64 of the NOFO for details.

Renewal Projects:

- ****NEW**** Because this is a 2-year NOFO process, CoCs must consider the need to continue funding for projects expiring in CY 2025 (January 1, 2025 to December 31, 2025) when applying for FY 2024 CoC and YHDP funding and CY 2026 (January 1, 2026 to December 31, 2026) when applying for FY 2025 CoC and YHDP funding. Renewal projects must meet the minimum project eligibility, capacity, timeliness, and performance standards identified in this NOFO or they will be rejected from

consideration for funding. HUD reserves the right to reduce or reject a project application submitted during the CoC Program Competition that does not meet these standards. See details at pp. 65.

- ****NEW**** Awards made under the FY 2024 CoC Program and YHDP will be eligible for renewal in FY 2025 CoC Program, subject to the FY 2025 HUD Appropriation and if they have a signed grant agreement with HUD that will expire in CY 2026 (January 1, 2026, and ending December 31, 2026). Projects that did not meet the eligibility criteria to renew in FY 2024 but are eligible for FY 2025 renewal funding must submit a renewal application by the FY 2025 application submission deadline of August 29, 2026, established in this NOFO.

Allowable Grant Terms

- The initial grant term for new project applications may be one year, two years, three years, four years, five years, or 15 years, but there are limitations depending on the grant type. Please see pp. 56-57 of the NOFO for details.
- HUD will allow new projects to request one year of funding with a longer initial grant term not to exceed 18 months. HUD has determined that most new projects requesting one year of funding normally take approximately three to six months to begin fully operating the new project (e.g., hiring staff, developing partnerships with landowners if leasing or renting). Therefore, a new project requesting one year of funding may request a grant term of 12-18 months that will allow for the additional start-up process.

Transition Projects

- Applicants may transition their project(s) from one CoC Program component to another (e.g., Transitional Housing to Rapid Rehousing, Rapid Rehousing to Permanent Supportive Housing) over a one-year grant cycle.
- To create a transition grant, the CoC must wholly eliminate one or more projects and use those funds to create a single, new transition grant.
- The applicant must have the consent of the CoC, as indicated by:
 - The project application identifying the project as a transition project, and
 - The CoC ranking the new transition grant project on the New Project Listing in the FY 2024 CoC Priority Listing.
- After the first operating year for which FY 2024 funds are awarded, the transition grant must be fully operating under the new component and will be eligible for renewal in the FY 2025 Operating year under the component to which it transitioned subject to the language in the FY 2025 HUD Appropriation. Projects seeking to renew with FY 2025 funds (including grants that renewed with FY 2024 funds) may submit a transition grant application for FY 2025 funds. Subject to the language in the FY 2025 HUD Appropriation, transition grant applications awarded FY 2025 funds must fully transition to the new component by the end of the 1-year grant term and must apply for renewal in the next CoC Program Competition under the component to which it transitioned.

Consolidation Projects

- Applicants may consolidate up to ten renewal projects into one project during the application process.
- This means that a CoC Program recipient does not have to wait for a grant agreement amendment to be executed to consolidate two or more grants before it can apply for a single consolidated project in the CoC Program Competition.
- The projects being combined during a grant consolidation will continue uninterrupted.

- To be eligible for consolidation, projects must have the same recipient and be for the same component. Additionally, YHDP projects cannot consolidate with non-YHDP projects. See section III.B.4.a.(7) of this NOFO for additional information. Transition grants cannot be consolidated with any other project.

Expansion Projects

- HUD will allow project applicants to apply for a new expansion project under the DV Bonus, reallocation, and CoC bonus processes to expand existing projects by adding units, persons served, and services provided to existing program participants, or to add additional activities to HMIS and SSO-CE projects.
- The new expansion project applications must meet the project eligibility and project quality thresholds in sections III.C.4.a. and b. of this NOFO and must be for the same component as the project being expanded.
- To apply for an expansion grant with CoC Bonus, DV Bonus, DV Reallocation, or CoC Reallocation funding, project applicants must submit separate new and renewal project applications and both projects must be ranked by the CoC with unique rank numbers.
- For the new expansion project to be selected for a conditional award the renewal project application must also be selected for a conditional award.
- In the case of YHDP Replacement applications to expand existing YHDP Renewal projects, applicants must submit a YHDP Replacement and a YHDP Reallocation application separately and each project must be included in the CoC's Priority Listing; however, these projects must not be ranked.
- For more information on Expansion projects, see pp. 43-45 of the NOFO.

Eligible Types of New Projects Created Through Bonus or Reallocated Funding

- **CoCs may apply for the following types of new CoC projects through reallocation or the CoC Bonus process:**
 - PH-PSH projects.
 - PH-RRH projects.
 - Joint TH/PH-RRH component projects.
 - Dedicated HMIS project
 - SSO-CE project to develop or operate a Coordinated Entry system
- **Permanent Supportive Housing** projects for persons experiencing chronic homelessness at the time they initially enroll in the project persons eligible to be served by DedicatedPLUS projects as described in Section I.B.2.b(7) of the NOFO (in which case all units funded by the project must be used to serve program participants who meet the qualifications for DedicatedPLUS).
- **Rapid Rehousing** projects for people who qualify as homeless under paragraphs (1), (2), or (4) of 24 CFR 578.3 (and paragraph (3) if the CoC is approved to serve this population).
- **Joint Transitional Housing and Rapid Rehousing** component projects for people who qualify as homeless under paragraphs (1), (2), or (4) of 24 CFR 578.3 (and paragraph (3) if the CoC is approved to serve this population).
- **Dedicated HMIS** project for the costs at 24 CFR 578.37(a)(4) that can only be carried out by the HMIS Lead, which is the recipient or subrecipient of an HMIS grant and is listed on the HMIS Lead form in the CoC Applicant Profile in e-snaps. Additionally, if the CoC has organizations within its geographic area that are victim service providers, the HMIS Lead, or subrecipient, may

request HMIS funds for a comparable database. Victim service providers may also request HMIS funds in their project application budgets to enter data into a comparable database.

- **Supportive Services Only** projects for Coordinated Entry project to develop or operate a centralized or coordinated assessment system.

Eligible Types of New Projects Created Through Domestic Violence (DV) Bonus

- Through this NOFO, at least \$52,000,000 is available nationally for DV Bonus projects, which are dedicated to survivors of domestic violence, dating violence, sexual assault, and stalking who qualify under paragraph (4) of the definition of homeless at 24 CFR 578.3.
- In the initial DV Bonus selection process, HUD will select approximately \$52,000,000 in new DV Bonus eligible projects. As HUD selects projects through Tiers 1 and 2, HUD will apply additional DV Bonus funds to selected projects and will continue doing so until the combined amount selected is at least \$52,000,000.
- **New Projects Created Through DV Bonus or DV Reallocation processes:** A CoC may apply the following types of projects:
 - **Rapid Rehousing** that adopts a Housing First approach and is dedicated to serving survivors of domestic violence, dating violence, sexual assault, or stalking that are defined as homeless (24 CFR 578.3)
 - **Joint Transitional Housing and Rapid Rehousing** that adopts a Housing First approach and is dedicated to serving survivors of domestic violence, dating violence, sexual assault, or stalking that are defined as homeless (24 CFR 578.3)
 - **Supportive Services Only projects for Coordinated Entry** to implement policies, procedures, and practices that equip the CoC's coordinated entry to better meet the needs of people experiencing homelessness who are survivors of domestic violence, dating violence, sexual assault, or stalking (e.g., to implement policies and procedures that are trauma-informed and client-centered or to better coordinate referrals between the CoC's coordinated entry and the victim service providers coordinated entry system where they are different)
- **Project Quality Threshold for DV Bonus.** To be eligible to receive a new DV Bonus project, a CoC must demonstrate it ranks projects based on how they improve system performance as outlined in Section I.B.3. of the NOFO. Additionally, to be eligible to receive a DV Bonus project for PH-RRH or Joint TH and PH-RRH component, all projects funded through the DV Bonus must adopt a Housing First approach.
- **Number of Applications.** A CoC may apply for any number of PH-RRH and Joint TH and PH-RRH projects provided that each application is for at least \$50,000. A CoC can only submit one new project application for an SSO-CE project.
- **Expansion Projects.** A CoC may apply to expand an existing renewal project, including one that was previously funded with DV Bonus funding. DV Bonus funding may be used to expand an existing renewal project that is not dedicated to serving survivors of domestic violence, dating violence, and/or stalking so long as the DV Bonus funds for expansion are solely for additional units, beds, or services dedicated to persons eligible to be served with DV Bonus funding. HUD will only select a new DV Bonus project that expands an existing renewal project if HUD selects the renewal project in Tier 1 or 2. For DV Bonus applications that propose expansion but do not meet requirements for an expansion project or the renewal portion is not selected in Tier 1 or 2, HUD will consider the DV Bonus application as a standalone DV Bonus application and use the DV Bonus selection process outlined in I.B.2.b.(8).

- **Ranking.** CoCs are required to rank all DV Bonus projects on the New Project Listing of the CoC Priority Listing with a unique rank number and the corresponding renewal project application must be on the Renewal Project Listing with a unique rank number. A new DV Bonus project that expands an existing renewal project will only be selected if the renewal project is conditionally selected in Tier 1 or 2. If the renewal project application is selected for conditional award with CoC Program funds and the new DV Bonus expansion project is approved for selection, HUD will only select the new DV Bonus project with DV Bonus funds and HUD will remove the new DV Bonus project from the New Project Listing and all other project applications ranked below the new DV Bonus project will move up one rank position.
- **Scoring.** For new projects the CoC indicates it would like considered as part of the DV Bonus, HUD will award a point value to each project application combining both the CoC Application score and responses to the domestic violence bonus specific questions in the CoC Application using the following 100-point scale:
 - For Rapid Rehousing and Joint Transitional Housing and Rapid Rehousing component projects:
 - *CoC Score.* Up to 50 points in direct proportion to the score received on the CoC Application.
 - *CoC Collaboration with Victim Service Providers.* Up to 10 points in direct proportion to the score received on the following rating factors in the CoC application: Section V.B.1.e, Section V.B.2.c, and Section V.B.3.b.
 - *Need for the Project.* Up to 10 points based on the extent the CoC quantifies the need for the project in its portfolio, the extent of the need, and how the project will fill that gap.
 - *Quality of the Project Applicant.* Up to 15 points based on the previous performance of the applicant in serving survivors of domestic violence, dating violence, sexual assault, or stalking, and their ability to house survivors and meet safety outcomes.
 - *Demonstration of inclusion of victim-centered practices.* Up to 8 points based on the quality of the project's plan to address the housing and safety needs of survivors by adopting victim-centered practices (e.g., Housing First, Trauma-Informed Care, Confidentiality) in operating their project. Full points will be awarded to project applicants that can demonstrate they are already adopting victim-centered practices.
 - *Demonstration of plan to include survivors with lived expertise.* Up to 7 points based on the project's ability to demonstrate its plan to involve survivors in policy and program development throughout the project's operation.
 - For Supportive Services Only Projects for Coordinated Entry:
 - *CoC Score.* Up to 50 points in direct proportion to the score received on the CoC Application.
 - *CoC Collaboration with Victim Service Providers.* Up to 10 points in direct proportion to the score received on the following rating factors in the CoC application: Section V.B.1.e, Section V.B.2.c, and Section V.B.3.b.
 - *Need for the Project.* Up to 25 points based on the extent to which the CoC demonstrates the need for a coordinated entry system that better meets the needs of

survivors of domestic violence, dating violence, sexual assault, or stalking, and how the project will fill this need.

- *Demonstration of plan to include survivors with lived expertise.* Up to 15 points based on the project's ability to demonstrate its plan to involve survivors in policy and program development throughout the project's operation.

Important Points for Renewal Projects

- **FY 2024 Renewals:** Awards HUD made under the CoC Program and YHDP are eligible for renewal with FY 2024 CoC Program funds if they are currently operating and have an expiration date in CY 2025 (the period from January 1, 2025, through December 31, 2025).
- **FY 2025 Renewals:** Awards made under the CoC Program and YHDP will be eligible for renewal with FY 2025 CoC Program funding subject to the FY 2025 HUD Appropriation and if they have a signed grant agreement with HUD that will expire in CY 2026 (January 1, 2026, and ending December 31, 2026).
- For awards made in FY 2024, HUD will make FY 2025 awards using the FY 2024 application, subject to any FMR and Cost of Living adjustments and FY 2025 appropriations. Projects that did not meet the eligibility criteria to renew in FY 2024 but are eligible for FY 2025 renewal funding must submit a renewal application by the FY 2025 application submission deadline established in this NOFO.
- **Grant Term.** All CoC Program renewal project applications are limited to a one-year grant term and one year of funding. Any renewal permanent housing project that receives project-based rental assistance or operating costs may request up to a 15-year grant term; however, project applicants may only request one year of funding. The grant term may be extended consistent with 2 CFR 200.308 and 2 CFR 200.309.
- **Project Quality Threshold.** HUD will review renewal projects to determine if project applicants and subrecipients meet the project quality threshold requirements detailed in section III.C.5.d. of this NOFO. If HUD determines these standards are not met, HUD will reject the project application, unless otherwise provided in this NOFO.
- **Eligible Program Participants**
 - **PH-PSH projects** must serve one of the following:
 - Program participants who are eligible for assistance under the project's current grant agreement;
 - Persons eligible to be served by DedicatedPLUS projects as described in Section I.B.2.b(7) of the NOFO where all units funded by this project must be used to serve program participants who meet the qualifications for DedicatedPLUS; or
 - Persons experiencing chronic homelessness at the time they initially enrolled in the project.
 - **PH-RRH, Joint TH and PH-RRH component, TH, and SSO projects** may serve persons who qualify as homeless under paragraphs (1), (2), or (4) of 24 CFR 578.3. Additionally, these projects may serve persons who qualify as homeless under paragraph (3) of 24 CFR 578.3 if the CoC is approved to serve persons in paragraph (3).
 - Renewal projects originally awarded under a previous year's **DV Bonus** must continue to serve survivors of domestic violence, dating violence, sexual assault, and stalking who qualify under paragraph (4) of 24 CFR 578.3.

Youth Homelessness Demonstration Program (YHDP) Renewals

- There is approximately \$188,000,000 available for non-competitive renewal and replacement of expiring YHDP Grants.
- HUD will conditionally select all renewal, and replacement YHDP projects (including those projects created through reallocation) that pass project eligibility and project quality threshold review. YHDP projects that do not meet quality threshold will be conditionally selected with conditions that the recipient correct any project quality threshold failures prior to executing a grant agreement.
- **Replacement.** The Consolidated Appropriations Act, 2024 permits the renewal or replacement of YHDP projects under the CoC Program; therefore, a renewing YHDP project may choose to replace its current program project with a new project which may include activities ineligible under the CoC Program, or portions of its current program design, to conduct activities that are ineligible with CoC Program funds provided the replacement project demonstrates it will directly serve youth aged 24 and under experiencing homelessness. Please see pp. 41-42 of the NOFO for more details on the replacement application process, eligible replacement project types, and eligible special YHDP activities.
- **Match.** YHDP renewal or replacement projects will not be required to meet the 25% match requirement if the applicant is able to demonstrate it has taken reasonable steps to maximize resources available for youth experiencing homelessness.
- **Grant Term.** YHDP Renewal, and YHDP Replacement project applications submitted during the FY 2024 and FY 2025 CoC and YHDP Funding Processes are limited to a 1-year grant term with 1 year of funding. HUD may extend the grant term consistent with 2 CFR 200.308 and 2 CFR 200.309. The first year of funding for YHDP Replacement projects will be based on the 1-year renewal amount of the current YHDP project being replaced. The YHDP Replacement project's operating start date will be the day after the end of the previous grant term for the project being replaced.
- **Consolidation, Expansion, and Reallocation.** While YHDP projects can use the consolidation process as outlined in Section III.B.4.a.(7) of the NOFO, these projects cannot consolidate with non-YHDP projects. YHDP Renewal projects may also apply to expand its current project through the YHDP Replacement process. See section III.B.4.a.(6)(c) for more information. Unified Funding Agencies (UFAs) are prohibited from moving funds out of or into YHDP-funded projects and mix funding from any other non-YHDP funded project. UFAs may replace eligible YHDP renewal projects.
- YHDP projects eligible to renew in the CoC Program Competition for the first time in FY 2025 must submit their renewal or replacement application by August 29, 2025 and will be selected by HUD non-competitively for a grant term of 1 year, subject to the FY 2025 HUD Appropriations. YHDP projects renewing in FY 2025 for the first time may not be reallocated.
- **Eligible Participants.** YHDP renewal projects must serve youth, age 24 or younger, who qualify as homeless under paragraph (1), (2), and (4) of 24 CFR 578.3, including unaccompanied, pregnant, and parenting youth, where no member of the household is older than 24. Additionally, these projects may serve youth aged 24 and under who qualify as homeless under paragraph (3) of 24 CFR 578.3 if the CoC is approved to serve persons in paragraph (3).
- **YHDP eligible project types:**
 - Permanent Housing, including PH-PSH and PH-RRH projects
 - Joint TH/PH-RRH Component
 - TH or Crisis Residential Transitional Housing

- SSO, including, but not limited to, housing search and placement services, case management, drop-in centers, legal services, or street outreach
- SSO-CE
- SSO - Host Home and Kinship Care
- The inclusion of TH and SSO that are not SSO-CE are only available to YHDP Replacement project applications which includes YHDP Reallocation projects

Important Points for All Project Applicants

- CoC Application and Project Applicant Scoring did not change significantly from FY 2023 NOFO. See this NAEH CoC Scoring Chart Comparison resource for a summary of changes: https://endhomelessness.org/wp-content/uploads/2024/07/2024-2025_NOFO_ScoringChartComparison.pdf
- **SAM Registration Requirement.** Applicants must be registered with <https://www.sam.gov/SAM> before submitting their application. Applicants must maintain current information in SAM on immediate and highest-level owner and subsidiaries, as well as on all predecessors that have been awarded a federal contract or grant within the last three years, if applicable. Information in SAM must be current for all times during which the applicant has an active Federal award or an application or plan under consideration by HUD.
- **UEI Number Requirement.** Applicants must provide a valid UEI number, registered and active at <https://www.sam.gov/SAM> in the application.
- **Code of Conduct.** All project applicants must ensure their organization has a Code of Conduct that complies with the requirements of 2 CFR part 200 and is on file with HUD. Be sure to review the [Code of Conduct for HUD Grant Programs](#) page on HUD's website to ensure your organization is listed (which means you have submitted an approved Code of Conduct). If you do not see your organization on the list, be sure to attach a current and complete Code of Conduct to your Project Applicant Profile in *e-snaps*.
- **2025 FMRs Will Apply.** Because the application submission deadline falls in FY 2025, HUD will use FY 2025 FMRs for funding amounts.

Community-Level Changes and Reminders

- **Affirmative Furthering Fair Housing.** HUD revised the Centralized or Coordinated Assessment System rating factor (V.B.j.) to place emphasis on CoCs affirmatively marketing housing and services available within the CoC broadly throughout the local area to any demographic groups that would be unlikely or least likely to apply absent such efforts. One point was added for this rating factor.
- **Addressing the Needs of Lesbian, Gay, Bisexual, Transgender, and Queer (LGBTQ+) Individuals.** HUD continues to give points for factors for addressing the needs of LGBTQ+ individuals to continue emphasizing CoCs implementing and training their providers on the CoC-wide anti-discrimination policies that ensure LGBTQ+ individuals and families receive supportive services, shelter, and housing free from discrimination.
- **Involving Individuals with Lived Experience of Homelessness in Service Delivery and Decision Making and Provide Professional Development and Employment Opportunities.** One more point was added to Section V.B.1.r of the NOFO for CoCs that demonstrate:

- Outreach efforts (e.g., social media announcements, targeted outreach) to engage those with lived experience of homelessness in leadership roles and decision-making processes
- Individuals with lived experience of homelessness participate in CoC committees, subcommittees, or workgroups
- Individuals with lived experience of homelessness are routinely included in decision-making processes of the CoC related to addressing homelessness (e.g., minutes from CoC or CoC Subcommittee meetings show people with lived experience are involved in decision-making)
- Individuals with lived experience of homelessness are included in the development, or revision, of the local competition rating factors
- Professional development (e.g., internships, continuing education, skill-based training) and employment opportunities are provided to individuals with lived experience of homelessness either within the CoC or by CoC membership organizations
- Feedback is routinely gathered from people experiencing homelessness and people who have received assistance through the CoC or ESG program on their experience receiving assistance and the steps the CoC takes to address challenges raised by people with lived experience of homelessness

Persons with lived experience must have been homeless within the last seven years or are currently program participants. Full points are available if there is more than one person with lived experience of homelessness engaged in local CoC planning and at least one person with lived experience came from an unsheltered situation.

- **Increasing Affordable Housing Supply.** The NOFO awards points to CoCs that take steps to engage local leaders about increasing housing supply. CoCs must describe at least 2 steps they have taken in the past 12 months that engage city, county, or state governments within their geographic area regarding the following:
 - Reforming zoning and land use policies to permit more housing development; or
 - Reducing regulatory barriers to housing development.
- **Racial Disparities.** HUD continues to award points for CoCs evaluating racial disparities and making system and program changes to address racial equity.
- **Promoting Racial Equity in the Local CoC Process.** HUD continues to have points available to CoCs that are promoting racial equity through the local CoC competition. The points will be awarded on the rating factors; review, selection, and ranking processes used; and if rating and ranking of projects is based on the degree to which projects have identified any barriers to participation (e.g., lack of outreach) faced by persons of different races and ethnicities, particularly those over-represented in the local homelessness population, and are taking or will take steps to eliminate the identified barriers. One point was added for this rating factor.
- **Leveraging Housing Resources.** CoCs may receive up to 7 points in Section V.B.6.a of the NOFO (same as 2023) if the CoC Priority Listing includes at least one new permanent supportive housing or rapid rehousing project application created through reallocation or the CoC Bonus that utilizes housing subsidies or subsidized housing units funded through sources other than the CoC or ESG programs. The full 7 points will be awarded if at least 25% of the units (PSH) or participants (RRH) will be supported with non-CoC funded housing. CoCs must attach letters of commitment, contracts, or other formal written documents that demonstrate the number of subsidies or units being provided to support the project. See Section V.B.6.a of the NOFO for additional details.

- **Leveraging Healthcare Resources.** CoCs may receive up to 7 points in Section V.B.6.b of the NOFO (same as 2023) if the CoC Priority Listing includes at least one new permanent supportive housing or rapid rehousing project application that utilizes healthcare resources to help individuals and families experiencing homelessness. This must be documented with a written commitment from a healthcare organization to provide substance use treatment or recovery services to all interested program participants who qualify or to provide services equal in value to 25% of the funding being requested by the project. See Section V.B.6.b of the NOFO for additional details.
- **DV Bonus.** HUD maintained the point value distribution for project applications based on the CoC Application score and responses to the revised domestic violence bonus specific questions in the project applications. HUD maintained scoring factors based on the responses to questions that demonstrate CoCs' collaboration with victim service providers in the CoC Application, projects' plans to include survivors with lived experience in policy and program development and the inclusion of victim-centered practices in operating their projects.
- **Indian Tribes and Tribally Designated Housing Entities (TDHE).** In the FY 2021 competition, Tribes and TDHEs were eligible to apply for projects through existing CoCs only. In the FY 2022 competition, HUD published PPRNs for all formula areas, as that term is defined in the Indian Housing Block Grant program at 24 CFR 1000.302, including tribal formula areas, and allowed CoCs to include tribal formula areas in their CoC geography during the FY 2022 CoC Program registration process. A Tribe or TDHE could also form a CoC including only tribal formula areas as part of their geography through the CoC registration process. Tribes and TDHEs remain able to be designated as Collaborative Applicants.
- **CoC Mergers.** To encourage CoC mergers and mitigate the potential adverse scoring implications that may occur when a high-performing CoC merges with one or more lower-performing CoC(s), HUD will award up to 25 bonus points (same as 2023) to CoCs that first registered as merged CoC during the FY 2024 CoC Program Registration process.
- **Projects on Reservations and Trust Land.** Applicants that propose to locate a project on a reservation or trust land must include a tribal resolution from the tribe authorizing the applicant to do so or a letter from an official or principal of the Indian Tribe or TDHE who is authorized to act on behalf of the Indian Tribe or TDHE indicating approval. Tribes do not need to include a tribal resolution or a letter from an official of the Indian Tribe or TDHE who is authorized to act on behalf of the Indian Tribe or TDHE to site a project on their own reservation or trust land. A tribal resolution is the formal way the tribal government expresses its legislative will in accordance with its organic documents. In the absence of such organic documents, a written expression adopted pursuant to tribal practices will be acceptable.
- **Participative Planning and Implementation.** Applicants must identify the steps they will take to ensure that traditionally marginalized populations (such as racial and ethnic minorities and persons with disabilities) will be able to meaningfully participate in the planning process. The applicant must identify the specific populations that it will include, identify community organizations that represent these populations, and describe how these populations will be included in the planning process. In seeking public participation, applicants and recipients must ensure that all communications are provided in a manner that is effective for persons with hearing, visual, and other communication-related disabilities consistent with Section 504 of the Rehabilitation Act of 1973 and, as applicable, the Americans with Disabilities Act. In addition, Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d requires that grantees take reasonable steps to ensure meaningful access to services, programs, and activities by persons with Limited English Proficiency (LEP persons).

- **Homelessness and Human Trafficking.** HUD has clarified that persons who are fleeing or attempting to flee human trafficking may qualify as homeless under paragraph (4) of the homeless definition at 24 CFR 578.3; and, therefore, the individuals may be eligible for certain forms of homeless assistance under the CoC Program, subject to other restrictions that may apply. HUD considers human trafficking, including sex trafficking, to be “other dangerous or life-threatening conditions that relate to violence against the individual or family member” under paragraph (4) of the definition of homeless at 24 CFR 578.3. However, HUD clarified that a DV Bonus project may not exclusively serve people fleeing or attempting to flee human trafficking.

Resources

- 2024 CoC NOFO Competition Page: https://www.hud.gov/program_offices/comm_planning/coc/competition
- 2024 CoC NOFO: <https://www.grants.gov/search-results-detail/355762>
- CoC Program Interim Rule (24 CFR part 578): <https://www.govinfo.gov/content/pkg/CFR-2018-title24-vol3/xml/CFR-2018-title24-vol3-part578.xml>
- Application Pages
 - Access *e-snaps* Application System: <https://esnaps.hud.gov>
 - *e-snaps* Information: <https://www.hudexchange.info/programs/e-snaps/>
 - Code of Conduct for HUD Grant Programs: https://www.hud.gov/program_offices/spm/gmomgmt/grantsinfo/conductgrants
 - System for Award Management (SAM): <https://www.sam.gov/SAM>
- Miscellaneous HUD Websites
 - General site: www.hud.gov
 - General site: www.hudexchange.info
 - Training and Resources: www.hudexchange.info/homelessness-assistance/
 - Subscribe to HUD Listserv: www.hudexchange.info/maillinglist
 - Ask A Question (AAQ) Portal: <https://www.hudexchange.info/program-support/my-question/>