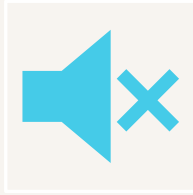


FY2026 COC COMPETITION OVERVIEW

For the Eastern PA CoC
Presented by Framework Strategies
June 24, 2026



WEBINAR LOGISTICS



Please mute when not talking to cut down on background noise



Feel free to type in questions or unmute to ask questions during the question breaks



We'll have time for discussion & Q&A at the end

WEBINAR AGENDA

- High-Level CoC NOFO Overview
- Key Changes in the FY26 CoC NOFO
- HUD Goals and Objectives
- Funding and Tiering Information
- Scoring of the CoC-Level Application
- Project-Level Information
- Resources
- Q&A

HIGH-LEVEL COC NOFO OVERVIEW

TERMS

- **Continuum of Care – CoC**
 - This can refer to the Continuum of Care Program, administered by HUD
 - This can also refer to the local Continuum of Care
- **Notice of Funding Opportunity – NOFO**
- **Renewal Projects** – projects that currently receive CoC Program funds that can be renewed
- **New Projects** – projects that are not currently receiving CoC Program funds and would be “new” to the community
- **Reallocation** – process by which funds are moved from existing projects to new projects
- **Annual Renewal Demand** – the amount of funds for a CoC to renew all existing projects

HIGH-LEVEL OVERVIEW

Local CoCs apply to HUD for CoC Program funding through the CoC Notice of Funding Opportunity (NOFO) Competition.

CoC Program funds are competitive. Each CoC is eligible to apply for a maximum amount of money, but only a portion of these funds are “guaranteed”/ “safe” (aka Tier 1).

As part of the CoC NOFO Competition, CoCs submit renewal project applications (existing grantees that wish to renew their funding) and new project applications.

HIGH-LEVEL OVERVIEW

- Prior to submitting the community's application to HUD for funding through the CoC Program NOFO, the CoC facilitates a **local funding competition**.
- This local competition includes:
 - Evaluating the performance of renewal projects (existing CoC grantees) to determine which renewal projects will be submitted to HUD for funding, and how they will be ranked.
 - Soliciting and selecting new projects. When HUD releases the NOFO, they indicate how much new funding each CoC is eligible to apply for. (*FY26 amounts not yet released by HUD.*)

HIGH-LEVEL OVERVIEW

- HUD uses a 2-Tier system when awarding funding.
 - **Tier 1** = “Safe” funds
 - **Tier 2** = Competitive funds
 - All CoCs nationally compete for their projects in Tier 2.
- Once the local CoC evaluates and selects the renewal project applications and new project applications to be submitted to HUD, CoCs are required to rank all projects.
 - Example: If the CoC is submitting 50 projects to HUD, projects are ranked 1 to 50.
 - Projects are ranked/prioritized by the CoC based on locally established funding priorities and policies.
 - Once the CoC completes its ranking, some projects will fall into Tier 2.

PARTS OF THE COC CONSOLIDATED APPLICATION SUBMISSION

CoC-level Application

- Completed by the Collaborative Applicant.
- Questions relate to how the CoC operates, governance structure, overall performance, policies, and strategies.
- This part of the application is scored and will determine the amount of funding each CoC receives.

Project Applications

- Completed by renewal project applicants and new project applicants.
- These are the applications that describe what each project is requesting funding to do.
- Renewal project applicants and new project applicants must apply through their local CoC Competition and be accepted by the CoC. If accepted, they then apply through e-snaps (HUD's application system).

Priority Listing

- Completed by the Collaborative Applicant.
- This list includes all project applications.
- The CoC must rank all projects except the Planning project. This is also where the CoC tells HUD if it is planning to reallocate funds (take funds from an existing grant and put toward new projects).

HIGHLIGHTS & KEY CHANGES IN THE FY26 COC NOFO

- **FY26 Application: Due August 26, 2026, by 8PM EST**
- **Internal deadlines remain the same:**
 - CoCs must notify applicants at least 15 days before the 8/26/26 deadline of whether their applications are accepted and ranked, rejected, or reduced on the Priority List. **This is 8/11/26.**
 - CoCs must post CoC Application (w/Attachments) and Priority List on a website prior to the deadline and notify community members and key stakeholders.
 - Past requirement was that this be posted at least 2 days before the deadline. That is not explicitly stated in the NOFO.
- **Anticipated award date is December 1, 2026**

IMPORTANT DEADLINES/DATES

SUMMARY OF KEY CHANGES

- **Changes to Tier 1 & Tier 2**
 - Tier 1 is set at 60% Annual Renewal Demand (ARD) (30% FY25, 90% FY24)
 - Tier 2 funding is competed for nationally and will depend heavily on how the CoC scores in Merit Review (which has many new factors) compared to other CoCs.
- **No Permanent Housing Cap**
 - HUD removed the permanent housing cap of 30% that was in FY25 NOFOs
 - Instead, HUD is setting aside funding for DV Bonus (\$104M), TH & SSO (\$1.3B), and PH for families with children (\$430M) and funding these projects first. Other PH projects and HMIS in Tier 2 will be funded last (by score) and only if funds remain.
- **New Projects**
 - HUD is allowing and encouraging CoCs to create new Transitional Housing (TH) and Supportive Service Only (SSO). CoC Bonus and Reallocation funds available for this.
 - DV Bonus can be used to create new SSO-CE, RRH, and TH projects.
 - TH-RRH renewals allowed but no new TH-RRH projects allowed.
 - New projects must meet project quality thresholds to be considered by HUD.
- **Reallocation**
 - HUD continues to strongly encourage reallocation and will be heavily scrutinizing projects that are not meeting threshold/performance expectations. HUD released new guidance on participant eligibility to move from PSH or RRH to TH.
- **Major Changes to CoC Application Rating Factors**
 - New Rating Factors regarding program performance, treatment/sober housing, investment in supportive services, service participation requirements, participant self-sufficiency, engagement with law enforcement, addressing encampments, "drug enablement", programs/partnerships focusing on specific subpopulations, etc.

COC APPLICATION SCORING

**Points/CoC application scoring:
200 points available (+ bonus points)**

- Project Capacity, Review, and Ranking – 14 points
- System Performance – 64 points
- CoC Coordination and Engagement – 122 points
- CoC Merger Bonus Points – 6 bonus points
- Policy Priority Points - 14 points
 - Opportunity Zone Bonus Points – 4 points
 - Prohibiting Illicit Drug Enablement Points – 10 points

ELIGIBLE PROJECT TYPES

Eligible Project Types for FY26:

- Transitional Housing (TH)
- Supportive Services Only (SSO), including for Street Outreach, Coordinated Entry, and Standalone
- Permanent Housing (PH), including Rapid Re-Housing (RRH) and Permanent Supportive Housing (PSH)
- Homeless Management Information System (HMIS)
- No new joint component TH-RRH projects will be allowed. Existing TH-RRH projects can be renewed.
 - Applicants may only use CoC Program Leasing funds or non-CoC Program Funds to pay for the cost of housing program participants enrolled in the TH portion of the project.
- N/A - Older Safe Haven (SH) projects can be renewed

REALLOCATION AND TRANSITION GRANTS

- CoCs can **reallocate funding** from any eligible grant, including grants that have not been previously renewed under the CoC Program, as long as the grant is expiring in CY2027.
- To create a **Transition Grant** through the reallocation process, the CoC must wholly eliminate one or more projects and use those funds to create the single, new transition grant.
 - Renewal Grants expiring in CY 2027 may submit a FY 2026 transition grant application to request a component type change. The transition grant's operating start date will be the day after the end of the previous grant term for the expiring component.
 - Transition grant applications awarded FY 2026 funds must fully transition to the new component by the end of the 1-year grant term.

HUD GOALS & OBJECTIVES

HUD GOALS & OBJECTIVES

FY2024-FY2025 COC NOFO

1. Ending homelessness for all persons
2. Using a Housing First Approach
3. Reducing Unsheltered Homelessness
4. Improving System Performance
5. Partnering with Housing, Health and Service Agencies
6. Racial Equity
7. Improving Assistance to LGBTQ+ Individuals
8. Persons with Lived Experience/Expertise
9. Building an Effective Workforce Increasing Affordable Housing Supply

DECEMBER FY2025 CoC NOFO

1. Improving Outcomes
2. Restoring Balance to the Continuum of Care*
3. Prioritizing Treatment and Recovery as a Means to Self-Sufficiency
4. Promoting Economic Self-Sufficiency
5. Creating Competition to Improve Innovation and Accountability*
6. Ending the Crisis of Homelessness on Our Streets
7. Advancing Public Safety for All
8. Minimizing Trauma for Vulnerable Populations
9. Expanding Access Based on Merit, not Ideology*

FY2026 CoC NOFO

1. Improving Outcomes
2. Creating Competition to Improve Innovation
3. Restoring Balance to the CoC
4. Prioritizing Treatment and Recovery
5. Promoting Economic Self-Sufficiency
6. Advancing Public Safety for All
7. Minimizing Trauma for Vulnerable Populations
8. Expanding Access Based on Merit, Not Ideology

- This NOFO incentivizes outcomes, specifically **optimizing self-sufficiency, reducing homelessness, and minimizing trauma** caused to communities as a whole by homelessness.
- This NOFO focuses on reductions to **unsheltered** homelessness and **encampments**.
- CoCs should prioritize projects that promote **self-sufficiency**, increase **employment income** over government assistance, and promote **treatment and recovery**.
- This NOFO includes several options for CoCs to improve effectiveness: **reallocation, expansion, and transition grants**. CoCs should take advantage of these options to **expand the pool of successful providers** and **improve overall performance**.
- This NOFO makes significant investments in **Transitional Housing** and **Supportive Services Only**.

1. IMPROVING OUTCOMES

- The Continuum of Care program was intended to be a "national competition between geographic areas". Since 2013, the most competitive CoC competition required only 15% competition on the basis of merit, and the least competitive required merely 5% competition.
- Consistent with the FY26 appropriation bill, **HUD is setting Tier 1 at 60% and competing 40% of CoC ARD on the basis of merit between geographic areas.**
- Increased competition brings the CoC Program back to its original intent as a competitive program, not an entitlement program or block grant. Competition ensures that CoCs consistently evaluate the effectiveness of their projects and invest in new projects that deliver the best results at reducing homelessness and optimizing self-sufficiency.

2. CREATING COMPETITION TO IMPROVE INNOVATION AND ACCOUNTABILITY

- Instead of a balanced continuum of assistance, the CoC Program has become a "one size fits all" response to homelessness that restricted the spectrum of eligible program components, excluding a wide array of community providers in the process.
- By **investing in Transitional Housing and Supportive Service Only** projects, HUD intends to restore the "continuum" to the Continuum of Care Program to help able-bodied people move to self-sufficiency.
- **Individuals who are likely to never be able to return to the workforce**—over 62 years old, physically disabled, developmentally disabled—should be prioritized for Permanent Supportive Housing. Many individuals with disabilities, including impairment due to substance abuse, are able to recover and regain self-sufficiency and deserve every opportunity to receive treatment and services to help them do so.
- To the extent permitted by law, **HUD is shifting its focus from awarding nearly 90% of CoC funding to Permanent Housing to expand opportunities for other components of the CoC Program.**

3. RESTORING BALANCE TO THE CONTINUUM OF CARE

- This NOFO provides communities **opportunities to invest in treatment services and recovery housing**, and ensures that **recipients do not distribute drug paraphernalia or knowingly permit the use and distribution of fatal, illicit drugs on their properties.**
- **This is not a requirement that projects condition assistance on sobriety or treatment**, although both are allowable under 24 CFR 578.
- CoCs should **prioritize projects that provide the treatment and services people need to recover** and regain self-sufficiency including on-site behavioral health treatment, robust wraparound supportive services, and participation requirements.
- The NOFO encourages **investment in treatment-focused beds, recovery housing, and partnership with community behavioral healthcare providers**, drug courts, and other addiction and severe mental illness treatment providers.

4. PRIORITIZING TREATMENT AND RECOVERY AS A MEANS TO SELF-SUFFICIENCY

- **One of the primary purposes of the CoC program is to optimize self-sufficiency.**
- CoCs should partner with workforce development centers, employers, childcare, and other service providers to **increase employment** and employment income for program participants.
- CoCs should **prioritize projects that help lead to economic independence** for individuals and families to **exit homelessness to unsubsidized housing** and prevent future returns to homelessness.
- One way to advance both recovery and self-sufficiency is through **supportive service participation requirements**. Well-designed supportive service participation requirements provide structure and accountability for program participants to meet their unique goals and needs.
- **HUD encourages supportive service agreements** that meet individual needs and advance individual progress towards self-sufficiency and independent living goals.

5. PROMOTING ECONOMIC SELF-SUFFICIENCY

- CoCs should **cooperate with law enforcement** to advance public safety for the entire community impacted by homelessness.
- **No one should sleep outside** on the street or in dangerous encampments, and **everyone should be able to enjoy public spaces safely.**
- Unchecked public camping and public illicit drug use inhibit nonprofit providers and local government from effectively addressing homelessness.
- **CoCs should work with law enforcement, first responders, and state/local governments to reduce encampments, public camping, and public drug use.**

6. ADVANCING PUBLIC SAFETY FOR ALL

- One of the purposes of the CoC program is to minimize the trauma associated with homelessness.
- CoCs should **encourage providers to provide trauma informed care and ensure participant safety in programs, especially for youth and survivors** of domestic violence, dating violence, sexual assault and stalking.

7. MINIMIZING TRAUMA FOR VULNERABLE POPULATIONS

- HUD is committed to providing an **equal opportunity to every applicant**, recipient, and program participant free from discrimination. Part of this commitment is recognizing that **faith-based providers deserve a level playing field to compete for CoC funding** and participate in the community-wide efforts of their local CoCs.
- To the fullest extent permitted by law, HUD will ensure that faith-based organizations can participate in the CoC program and **operate consistent with their sincerely held religious beliefs**, recognizing all relevant protections provided by the Equal Participation Rule, Religious Freedom Restoration Act, and the First Amendment.
- **This NOFO prohibits the use of federal funds being used for any type of racial preferences, even under the guise of "diversity, equity, and inclusion".**

8. EXPANDING ACCESS BASED ON MERIT, AND NOT IDEOLOGY

FUNDING & TIERING INFORMATION

FUNDING & TIERING OF PROJECTS

- **Tier 1** = 60% of Annual Renewal Demand (ARD)
 - ARD = Total of all renewal projects
 - **YHDP** and DV Bonus projects are competitive
- **Tier 2** = The difference between Tier 1 and the sum of each CoC's ARD, CoC Bonus, and DV Bonus.
- **CoC Bonus** = 15% of Final Pro Rata Need (FPRN), which is the higher of ARD and Preliminary Pro Rata Need (PPRN)
- In addition, HUD is awarding an additional \$104M in bonus projects specifically for survivors of domestic violence.
 - **DV Bonus** = 20% of PPRN

**Total
estimated
funding
available =
\$40,561,231**

ARD: \$30,175,685

Tier 1 (safe): \$18,105,411

Tier 2 (estimated): ~ \$20,955,820

Balance of ARD = \$12,070,274

CoC Bonus: \$4,526,352

DV Bonus (estimated*): ~ \$4,359,194

CoC Planning grant (non-competitive): \$1,500,000

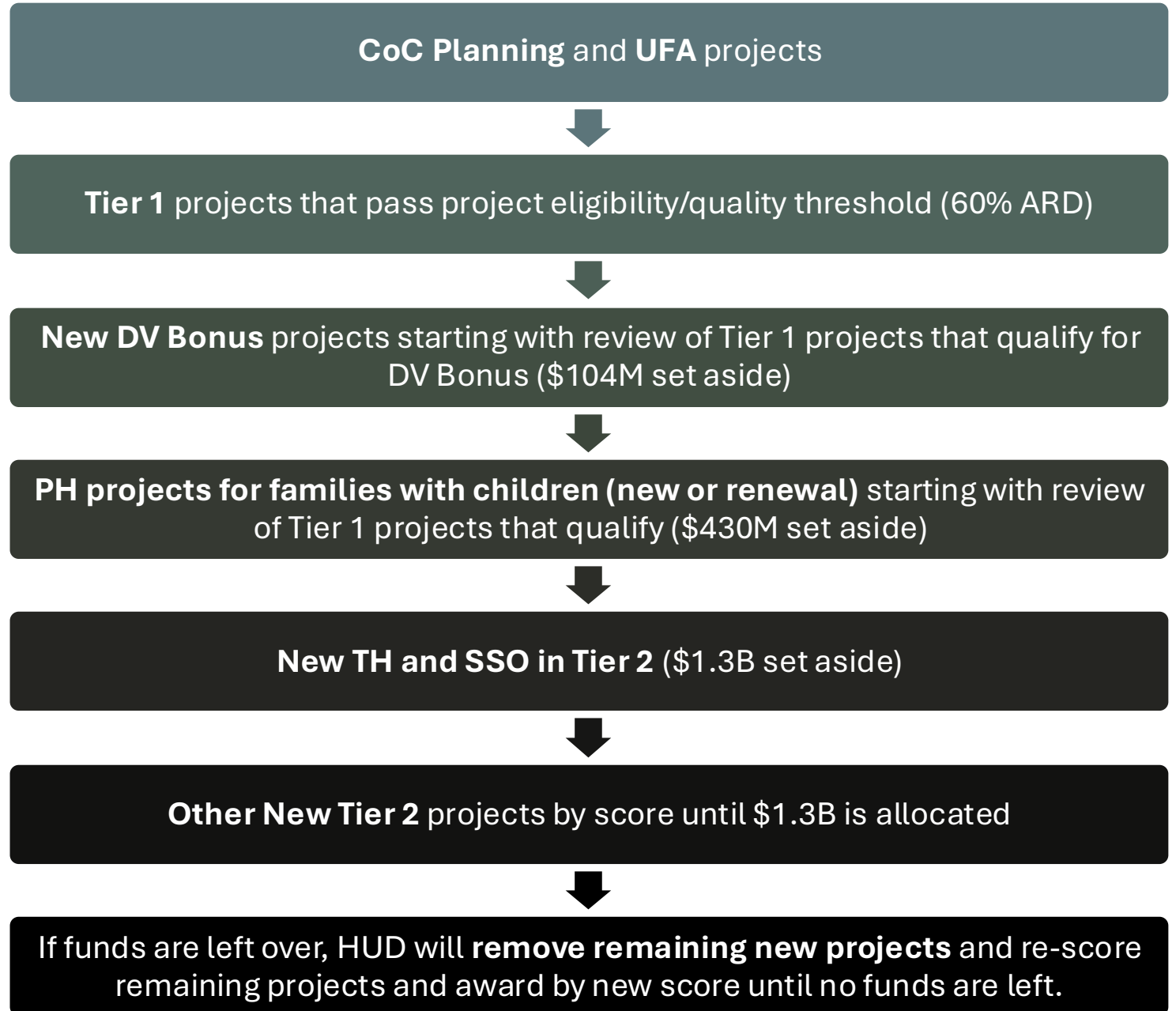
**WHAT DOES THIS MEAN FOR THE
EASTERN PA COC?**

SCORING OF TIER 2 RANKED PROJECTS

- Tier 2 projects will be competitively funded based on a maximum score of 100 points:
 - CoC Score = Up to 50 points
 - Project Ranking = up to 40 points based on how high the project is ranked in Tier 2 and how much in funding is ranked above it
 - Project commits to including Service Participation Requirements = Up to 10 points.
 - SSO and HMIS projects receive 10 points automatically.
 - This formula applies to any project in Tier 2, including DV Bonus
- Tier 2 projects may be:
 - Renewals; or
 - New projects created through reallocation; or
 - New CoC Bonus projects; or
 - New DV Bonus projects

ORDER OF FUNDING

- \$4.04B available
- No cap on Permanent Housing
- HUD has established priorities for Tier 2 funding that will make it **difficult for renewals and PH projects in Tier 2 to get funded**



FUNDING CHANGES MEAN HARD CHOICES

CoCs will need to make difficult decisions due to the changes HUD has implemented, both in terms of funding order and merit score:

- Determine which projects will be included in the 60% designated for Tier 1, thereby prioritizing them for funding.
 - **This is especially relevant to renewals b/c they are not prioritized for funding in Tier 2**
- Determine whether to replace existing PSH and RRH with TH or SSOs.
 - **New PH not prioritized for funding in Tier 2**
- Determine which projects will go in Tier 2 and in what order.

WHAT DOES THIS MEAN FOR THE EASTERN PA COC?

- **60% of ARD is \$18,105,411**

	# PROJECTS	AMOUNT	% FUNDS
PH	40	\$27,975,872	92.71%
PSH	22	\$8,127,862	
RRH	17	\$19,071,293	
TH/RRH	1	\$776,717	
TH	0	n/a	n/a
SSO	1	\$80,388	0.27%
SSO-CE	4	\$1,702,381	5.64%
HMIS	1	\$417,044	1.38%
TOTAL	46	\$30,175,685	

SCORING OF THE COC-LEVEL APPLICATION

SCORING OF COC-LEVEL APPLICATION

Comparison of Scoring Categories, 2022-2026	FY2024	FY2025	FY2026
Project Ranking, Review, and Capacity	28	9	14
System Performance	60	40	64
CoC Coordination and Engagement	84	81	122
Homeless Management Information System	9	0*	0*
Point-in-Time Count	5	0*	0*
Coordination with Housing and Healthcare	14	0*	0
TOTAL	200	130	200

*While Homeless Management Information System, Point-in-Time Count, and Coordination with Housing and Healthcare are not a standalone Rating Factor Categories this year, questions related to each of these remain and are incorporated into other categories. Notably, HUD will no longer award points for Housing/Healthcare Leveraging.

PROJECT CAPACITY, REVIEW & RANKING

Up to **14 points** to be awarded to CoCs that demonstrate the existence of a **coordinated, inclusive, and outcome-oriented community process** for the solicitation, objective review, ranking, and selection of project applications.

Rating Factor	Max Points
Objective Criteria and System Performance	6
“CoCs should consider factors such as financial stability, performance history, capacity, audit findings, and public complaints”	
Objective criteria = 50% points	1
System performance measures = 25% points	2
Consider returns to homelessness, employment income, and supportive service participation requirements for housing projects	3
Ranking and Selection Process	3
Reallocating Projects	5

SYSTEM PERFORMANCE

Up to **64 points** will be awarded to CoCs that have a CoC system-wide performance measurement process related to reducing homelessness.

Rating Factor	Maximum Points
Reducing the Number of Homeless Individuals and Families	20
Reducing Encampments	8
Reduce First-time Homelessness	2
Length of Time Homeless	2
Successful Exits from Assistance	6
Returns to Homelessness	6
Jobs and Income Growth	12
Timely Submission of Data	2
HMIS and Comparable Database Participation	2
Tracking Participant Outcomes in HMIS and Comparable Databases	2
Unit Utilization Rates	2

SYSTEM PERFORMANCE: PRIORITIZED RATING FACTORS

Emphasis on PIT decreases in unsheltered homelessness:

- Decrease in unsheltered homeless individuals and families using PIT data:
 - Up to 5 points for at least 20% decrease in 2026 PIT compared to prior year
 - Up to 5 points for decreases in number between 2024 and 2025 PITs AND 2025 and 2026 PITs
 - 2 points for decrease between 2024 and 2026 PITs
 - 2 points for decrease between 2018 or 2019 and 2026 PITs
- 3 points for 5% decrease in number of homeless individuals and families experiencing chronic homelessness between 2025 and 2026 PIT.
- 3 points for decrease of at least 20% in number of sheltered + unsheltered homeless individuals and families in 2026 PIT compared to prior year's data.
- Up to 8 points for reduction in the number of encampments or the number of people residing in encampments or describe participation in efforts to reduce encampments

SYSTEM PERFORMANCE CHANGES

System Performance Measures related rating factors:

- Heavy emphasis on SPM data outcomes:
 - Jobs and Income Growth (12 points for data outcomes)
 - Focuses on increases in income from employment solely
 - Returns to Homelessness (6 points for data outcomes)
 - Focuses on returns 12 months and 24 months after exit
 - Successful Exits from Assistance (6 points for data outcomes)
 - Focuses on successful exits from ES, TH and RRH and the percent of exits from TH/RRH/PSH to unsubsidized housing
- De-emphasis on:
 - CoC's strategies
 - Length of Time Homeless (2 points)
 - First-Time Homeless (2 points)
 - On time data submissions/PIT/HIC (2 points)
- Added:
 - No more than 10% rate of unknown exit destinations in HMIS for housing projects
 - Unit utilization at least 85%

COC COORDINATION AND ENGAGEMENT

Up to 122 points to be awarded to CoCs that demonstrate coordination with other systems of care that serve homeless individuals and families.

- Accountable Structure and Participation = 16 points
- Community Coordination = 72 points
- Coordination to Serve Subpopulations = 34 points

COC COORDINATION AND ENGAGEMENT: ACCOUNTABLE STRUCTURE AND PLANNING

Rating Factor	Max Points
Stakeholder Participation	2
Representative Governance Board	8
Transparent Processes	2
Comprehensive Strategies	4

NOTABLE ACCOUNTABLE STRUCTURE AND PLANNING RATING FACTORS

Representative Board – 8 points

CoC Governance Board should include:

- At least 1 person w/lived experience of homelessness = 1 point
- At least 3 elected public officials (only 1 needed if rural CoC)= 3 points
- 4 points will be given if ALL of the following stakeholders are represented, 2 points for majority:
 - business community,
 - law enforcement,
 - recovery housing/sober living provider,
 - behavioral or primary health provider,
 - workforce development, and
 - local court system managing treatment/civil commitment/specialty courts

COC COORDINATION AND ENGAGEMENT: COMMUNITY COORDINATION

Rating Factor	Max Points
Treatment and Recovery Services	20
Investment in Supportive Services	8
Participation Requirements for Supportive Services	8
ESG Recipients and Emergency Shelter	2
Data Sharing for Improved Outcomes and Transparency	2
Employment and Workforce Development	5
Street Outreach, Law Enforcement and First Responders	5
CoC Collaboration Related to Children and Youth	2
Family or Support Network Reunification	4
Public Housing Agencies	2
Protecting Public Safety	14
Outreach	2

Availability of Treatment and Recovery Services – 20 points:

- Substance use treatment is available **on-site for at least 30% of TH/PSH/RRH projects**
- CoC partners with, or has projects that provide, **outpatient treatment** for mental health and substance use disorders with a range of appropriate levels of care
- CoC partners with, or has projects that provide access to, **peer recovery** specialists or other forms of peer support and recovery navigation
- CoC **identifies individuals experiencing Serious Mental Illness** and connects them with the services necessary to promote stability
- CoC partnerships with providers/entities providing services in connection w/**Drug Courts and other specialty courts** serving individuals with mental and substance use disorders, Assisted Outpatient Treatment (AOT) programs, and inpatient civil commitment.
- CoC partnerships w/local **crisis system of care** including 988 and crisis contact centers, mobile crisis and outreach services, and crisis stabilization services
- Demonstrate that **for every 2 persons reporting chronic substance use** in PIT, there is **at least 1 CoC-funded unit that requires program participant engagement in substance abuse treatment services.**
- There is 24/7 access to **detox or inpatient treatment** in CoC geography
- **Formal partnership** with a Certified Community Behavioral Health Clinic (CCBHC), Community Mental Health Center (CMHC), SAMHSA Projects for Assistance in Transition from Homelessness (PATH) provider, Grants for the Benefit of Homeless Individuals (GHBI) provider, or a similar facility
- At least one existing or new **sober housing** for people in recovery
- CoC **coordinates** with the programs named in this section to facilitate warm hand-offs to stable housing providers and prevent entry into homelessness

NOTABLE COMMUNITY COORDINATION RATING FACTORS

NOTABLE COMMUNITY COORDINATION RATING FACTORS

- HUD has indicated that "assistance may not be denied on the basis or as a direct result of the fact that the participant is or has been a victim of domestic violence, dating violence, sexual assault, or stalking, if the participant otherwise qualifies for admission, assistance, participation, or occupancy.
- In [HUD FAQ document](#), they stated the following: "Supportive Service participation agreements require program participants to take part in supportive services (e.g. case management, employment training, substance use disorder treatment) in line with 24 CFR 578.75(h). The agreement may be in a contract, occupancy agreement, lease, or equivalent. An example of a supportive service participation requirement is a requirement that participants meet with a case manager at least once a month. This is an existing requirement of Rapid Rehousing projects. 24 CFR 578.37(a)(1)(ii)(F)."

Investment in Supportive Services – 8 points

- **CoC invests adequately in supportive services**, shown by either of the following:
 - Proposed **CoC funding, leveraging, match, and other formal partnerships**, provide supportive services value of **50%** of the CoC's ARD OR
 - **30% of their proposed CoC funding** is used for supportive services relative to ARD.

Participation Requirements for Supportive Services – 8 points

- Demonstrate that **housing projects require program participants to take part in supportive services** (e.g. case management, employment training, substance use disorder treatment) in line with 24 CFR 578.75(h) by providing **direct language from supportive service agreements** (contract, occupancy agreement, lease, or equivalent)
 - 8 points = **100%** of CoC housing projects have participation requirements
 - 4 points = **50%** of CoC housing projects have participation requirements

Protecting Public Safety – 14 points:

- demonstrate that the CoC **cooperates and does not interfere** with or impede law enforcement and first responders by providing evidence
- **identify local laws, policies, or other practices** that help or hinder the CoC's ability to advance the objectives below and provide a plan explaining how the CoC will leverage beneficial policies while overcoming the harmful effects of restrictive ones.
- **quickly clear tents and encampments** on public property and connect individuals who are camping in public with appropriate services”. The response must describe the current status of tents and encampments.
- **decrease the public use of illicit drugs** and quickly connect individuals who are using illicit drug in public with appropriate services and/or law enforcement
- **utilize standards** that address individuals experiencing homelessness who are a **danger to themselves or others (e.g. involuntary commitment)**
- comprehensively **share information**, including location information, in accordance with **SORNA**
- CoC should **maintain records** reflecting the analysis performed in response

NOTABLE COMMUNITY COORDINATION RATING FACTORS

COC COORDINATION AND ENGAGEMENT: COORDINATION TO SERVE SUBPOPULATIONS

Emphasis on partnerships and projects to serve these subpopulations. Varies by subpopulation as to what they want to see:

- Describe partnerships
- Describe existing or proposed projects
 - CoC-funded specifically for some and more general for others

Rating Factor	Max Points
Children and Youth	6
Families	4
Coordinate with Veterans	4
Survivors of Domestic Violence, Dating Violence, Sexual Assault, and Stalking	4
Justice System Re-entry	4
High Utilizes of Healthcare Systems	4
Aging and Elderly	4
PSH for Chronically Homeless Individuals and Families	4

POLICY INITIATIVE PREFERENCE POINTS

NOFO provides a maximum of policy initiative preference points, which are added to the CoC's overall application score, for the following:

- **Opportunity Zones:**
 - CoCs may receive up to **4 bonus points** if proposed activities are within an Opportunity Zone.
 - Must use at least **50% of the award** in Opportunity Zones to receive preference points.
- **Advancing Recovery by Prohibiting Illicit Drug Enablement:**
 - CoCs may receive up to **10 bonus points** for having a policy or statement to ensure **ALL housing projects** submitted by the CoC will not:
 - operate drug injection sites or **safe consumption sites**,
 - knowingly distribute **drug paraphernalia** on or off property under their control,
 - knowingly **permit the use/distribution of illicit drugs** on property under their control, or
 - **conduct, encourage, or allow these activities** under the pretext of “harm reduction”.
 - This does not constitute a requirement that participants must be sober to receive assistance or be evicted for first-time violations.
 - The policy must describe what remedies will be taken if a project is in violation, encourage the provision of treatment/recovery housing, and not restrict or prohibit projects that require participants to be sober/participate in treatment as a condition of assistance.

- Many expectations have changed and it will be difficult for CoCs to score high in the Merit Review.
- This NOFO has less clarity on how points will be awarded, more at HUD's discretion.
- This NOFO uses Merit Review to incentivize the kinds of projects this administration wants to see:
 - Treatment oriented, preferably on-site
 - TH and SSO over PH
 - Shifting resources to fund services
 - Projects focused on specific sub-populations (e.g. families, aging)
- Many points added related to encampments, public camping, and public use of illicit drugs.
- New expectations for CoC activities/partnerships:
 - Law enforcement, crisis response, and first responders
 - Specialty courts and involuntary commitment programs
 - Family reunification initiatives
 - Employment and workforce development programs
 - Behavioral Health providers (on-site, outpatient, peer support, detox, residential/inpatient, sober housing)

KEY TAKEAWAYS

QUESTIONS?



GENERAL COC PROJECT INFORMATION

Several layers of threshold criteria will be used by HUD in determining which projects are considered eligible for funding:

- Project eligibility thresholds – applies to all renewal and new projects.
 - Renewals assumed to have met some of these as long as no history of issues: unresolved monitoring, investigations, lack of quarterly draws, consistently late APR submissions)
- Renewal Project Threshold
 - “minimum project eligibility, capacity, timeliness, and performance standards” specific to renewal projects
- New Project Threshold
 - “minimum project eligibility, capacity, timeliness, and performance standards” specific to new projects
 - Project quality thresholds – project must earn enough points to pass the threshold for each project type

PROJECT THRESHOLD CRITERIA

GENERAL PROJECT ELIGIBILITY THRESHOLDS

The Project Eligibility Threshold requirements listed below apply to all projects being submitted. HUD will use a pass/fail standard and if a project fails, it will be rejected for funding consideration. Project Eligibility Thresholds (p. 59-61 of the NOFO) for all projects include:

- 1) Meet eligibility requirements of the CoC Program
- 2) Must demonstrate financial/management capacity and experience to carry out the project and the capacity to administer federal funds.
- 3) Population to be served must meet program eligibility requirements
- 4) Project applicants must agree to participate in a local HMIS system. Victim service providers must use a comparable database.
- 5) Project applicants must submit the required certifications specified in the NOFO.
- 6) 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 of 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”.
- 7) ***NEW:** “HUD reserves the right to verify past performance and evaluate the eligibility of a project application submitted during the CoC Program Competition to ensure it can adequately manage federal awards and comply with all applicable federal laws. HUD will not penalize applicant for complying with the terms and conditions of prior HUD grants.”

MINIMUM PROJECT ELIGIBILITY, CAPACITY, TIMELINESS, & PERFORMANCE STANDARDS

RENEWAL PROJECTS

- PASS/FAIL based on eLOCCS, APRs, Field Office, Monitoring/Audit Reports:
 - Performance met grant plans/goals
 - Timeliness standards (e.g drawdowns)
 - Performance in participant self-sufficiency
 - Grant management concerns
- HUD reserves the right to reject applications that have outstanding arrears, unsatisfactory/ overdue audit findings, major capacity issues, history of ineligible clients or costs, etc.

NEW PROJECTS

- If the applicant has existing CoC grants, HUD will assess for:
 - Satisfactory capacity
 - Regular (at least quarterly) drawdowns
 - Satisfactory performance
 - Timely resolution of monitoring findings
 - Ability to meet timeliness standards
 - APR submitted on time
- Expansion projects must describe the project being expanded and demonstrate it is not replacing other funding sources

COORDINATED ENTRY AND HMIS REQUIREMENTS

- **Coordinated Entry Participation** – FY26 CoC NOFO states: “24 CFR 578.23(c)(9) and (11) requires all CoC program recipients and subrecipients to use the centralized or coordinated assessment system established by CoCs.”
 - Exception for victim service providers: “Section 578.23(c)(9) of the CoC Program Rule exempts victim service providers from using the CoC’s coordinated entry process if victim service providers use a coordinated entry process that otherwise meets HUD's requirements.”
- **HMIS Participation** – Participation in HMIS, or a comparable database if a victim service provider, is a project eligibility threshold requirement.

PARTICIPANT ELIGIBILITY

PSH Projects

- Persons who qualify as homeless under Category (1) or (4) where the head of household also has a qualifying disability as defined section 401(9) of the McKinney-Vento Homeless Assistance Act.
- Renewal projects: the same population of individuals and families indicated in the expiring grant agreement

TH, PH-RRH, Joint TH/PH-RRH, SSO projects

- Persons who qualify as homeless under Category (1), (2*), or (4)
- Exception: Category 3 if the CoC is approved to serve that population

DV Bonus Projects

- Individuals and families who are fleeing or attempting to flee domestic violence, dating violence, sexual assault, and stalking and who qualify as homeless under Category (1) or (4)
- Exception: Category 3 if the CoC is approved to serve that population

PARTICIPANT ELIGIBILITY

Persons who qualify as homeless under paragraphs (1), (2), or (4) of 24 CFR 578.3 (HUD Homeless Definition) include:

- **Category 1:** persons residing in a place not meant for human habitation; residing in an emergency shelter or coming directly from the streets;
- **Category 2:** Individuals or family who will imminently lose their primary nighttime residence within 14 days and no subsequent residence has been identified and lacks the support to obtain other permanent housing
 - Serving individuals who are homeless under paragraph 2 in RRH, TH, TH/RRH, and SSO projects will depend on **CoC policy, Written Standards and Coordinated Entry Policies/Procedures – NOT CURRENTLY ELIGIBLE**
- **Category 4:** person who is experiencing trauma or a lack of safety related to, or fleeing or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous, traumatic, or life-threatening conditions related to the violence against the individual or a family member in the individual's or family's current housing situation, including where the health and safety of children are jeopardized (NOTE: this is definition from the VAWA 2022 reauthorization which governs CoC Program)
- **HUD guidance:** [“Program Participants’ Eligibility to Move from Permanent Supporting Housing \(PSH\) / Rapid Re-Housing \(RRH\) To Transitional Housing \(TH\)”](#)
 - PSH participants may be eligible to move to TH if they meet Category 2 or 4

- “Recipients and subrecipients may require the program participants to take part in supportive services that are not disability-related services provided through the project as a condition of continued participation in the program.
 - Examples of disability-related services include, but are not limited to, mental health services, outpatient health services, and provision of medication, which are provided to a person with a disability to address a condition caused by the disability.
 - Notwithstanding this provision, if the purpose of the project is to provide substance abuse treatment services, recipients and subrecipients may require program participants to take part in such services as a condition of continued participation in the program.”

[https://www.ecfr.gov/current/title-24/subtitle-B/chapter-V/subchapter-C/part-578/subpart-F#p-578.75\(h\)](https://www.ecfr.gov/current/title-24/subtitle-B/chapter-V/subchapter-C/part-578/subpart-F#p-578.75(h))

SUPPORTIVE SERVICES REQUIREMENTS

NEW PROJECTS

NEW PROJECT RFP

New Project RFP... coming soon

CoC will be prioritizing:

- Transitional Housing
- Supportive Services Only

Opportunities to:

- Create stand alone new project
- Expand existing project (limited)

FUNDING & MATCH

New project applicants can apply for funds for the following categories of eligible costs, also known as Budget Line Items (BLIs):

- Rental Assistance
- Leasing
- Operating
- Supportive Services
- HMIS
- VAWA Costs
- Administrative Costs
- *Removed: Rural Costs*

FUNDING & MATCH

- There are **various restrictions** that apply to the eligible costs/BLIs.
 - 24 CFR Part 578 Subpart D; <https://www.ecfr.gov/current/title-24/subtitle-B/chapter-V/subchapter-C/part-578/subpart-D>
 - CoC Binder: <https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/>
 - In FY26 CoC NOFO (p. 36-37), HUD says they will consider requests to waive requirement related to kitchen and bathroom being in the unit.
 - The CoC's New Project RFP/Solicitation will include more information on what is allowed.

- **Match:** All CoC projects have a **25% match requirement** (minus the leasing budget line item), including new projects.
 - 24 CFR 578.73: <https://www.ecfr.gov/current/title-24/subtitle-B/chapter-V/subchapter-C/part-578#578.73>
 - CoC Binder: <https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-match/coc-match-overview/>




HOUSING RELATED ELIGIBLE COSTS

Allowed Budget Line Items (BLIs) related to housing costs:

- Operating
 - Funds to operate a site owned or leased by your agency
 - Only specific costs are eligible
- Leasing (of a single site or scattered-site housing units)
 - Under a Leasing model, the provider enters into the lease with the landlord and has a sublease or rental agreement with the program participant. The provider pays 100% of the rent (up to Fair Market Rent) and the program participant pays 30% of household income to the provider.
 - Leasing restricted if you own the property.
 - When calculating 25% match requirement, leasing dollars are excluded from match requirement (i.e, total grant minus leasing x 25% = match requirement).
- Rental Assistance
 - Three types of Rental Assistance: Tenant Based (TBRA), Sponsor Based (SBRA), or Project Based (PBRA)
 - Under Rental Assistance model, the program participant enters into the lease with the landlord (TBRA, PBRA) or sublets from a sponsor agency (SBRA) and pays 30% of their income to the landlord/sponsor with the provider paying the balance of rent owed.
 - Rental Assistance CANNOT be combined with Operating
 - **Non-profits are allowed to administer Rental Assistance in PH projects but NOT TH projects. Non-profits can identify a local or state government agency or public housing authority to administer the RA as a subrecipient/subcontractor.**
- More info: <https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-eligible-activities/coc-eligible-activities-overview/>

HOUSING RELATED ELIGIBLE COSTS

How do you know whether to request Operating, Leasing, or Rental Assistance for a project?

- RRH: Only Tenant-Based Rental Assistance is allowed
- **TH: limitations for non-profits regarding Rental Assistance administration**
- Does your organization own the building that the project will be operated out of?  OPERATING
- Does your organization plan to enter into a lease directly with the landlord, then sublease to a participant?  LEASING
- Does your organization plan to have the participant enter directly into a lease with the landlord?  RENTAL ASSISTANCE

SUPPORTIVE SERVICES IN THE COC INTERIM RULE

The CoC Interim Rule lists Supportive Services eligible activities/costs as follows:

- annual assessment of service needs,
- assistance with moving costs,
- case management,
- child care,
- education services,
- employment assistance and job training,
- food,
- housing search and counseling services,
- legal services,
- life skills training,
- mental health services,
- outpatient health services,
- outreach services,
- substance abuse treatment services,
- transportation,
- utility deposits, and
- costs related to direct provision of services

Supportive services must be necessary to assist program participants obtain and maintain housing.

Full descriptions at 24 CFR 578.53: <https://www.ecfr.gov/current/title-24/section-578.53>

■ Admin - specifically for:

- Up to 10% of the project costs (not including Admin)
- General management, oversight, and coordination
- Training on Continuum of Care requirements
- Environmental review
- NOTE: Administrative costs for other eligible activities should be paid for out of those specific line items, NOT Admin. For example, you must pay for the costs of administering Rental Assistance from the funds allocated to Rental Assistance.

■ HMIS

- Can pay for costs related to participating in HMIS, such as HMIS fees or staff time to enter data.
- Only HMIS Leads can use the full scope of the HMIS eligible costs.

■ VAWA

- Covers costs related to facilitating Emergency Transfer Plans and compliance with VAWA confidentiality requirements.
- This BLI will be open to all projects in case it is needed but most will not need to budget any funds for this. Funding can be moved to cover these costs if needed.

OTHER ELIGIBLE COSTS

ELIGIBLE COSTS AND THE COC INTERIM RULE

- Read the CoC Interim Rule to determine whether the specific activities you have in mind are allowed as eligible costs.
- **Anything not stated in the CoC Interim Rule as allowed is NOT an eligible cost.**
- Remember you will need to document expenses to bill for them and CoC funds can only be used to pay for expenses related to serving project participants. Costs must be prorated if serving non-project participants.
- Remember that you will need to provide the 25% match so it is important to consider what other resources can be used even if something can be paid for with CoC funds.

NEW PROJECTS: PROJECT TYPES

PERMANENT SUPPORTIVE HOUSING (PSH)

- Permanent Supportive Housing (PSH) is permanent housing with indefinite leasing or rental assistance paired with supportive services to assist persons experiencing homelessness and have a disability or families with an adult or child member with a disability achieve housing stability.
- **New PSH projects will only be considered as expansion projects and only if project needs to expand supportive services budget to adhere to requirements.**

PSH: PASSING HUD THRESHOLD REVIEW

HUD **project quality threshold** for new Permanent Supportive Housing projects - must receive at least **3 out of 5 points to pass threshold**.

- 1 point - The type of **housing proposed**, including the number and configuration of units, will **fit the needs of the program participants**.
- 2 points - The type of supportive services that will be offered to program participants will ensure that the participant is able to **successfully obtain and retain permanent housing and in a manner that fits their needs** (e.g. transportation, safety planning, enhanced case management). If the applicant is proposing to expand an existing PH project, it must demonstrate how they are expanding supportive services to program participants, including where appropriate, on-site supportive services.
- 1 point - The project will serve homeless **individuals or families with a disability** in accordance with 24 CFR 578.37(a)(1)(i).
- 1 point - The **average cost per household served is reasonable**, consistent with 2 CFR 200.404.
- 1 point - 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.

RAPID RE-HOUSING (RRH)

- Rapid Rehousing provides supportive services and short or medium-term tenant-based rental assistance to help an individual or family experiencing homelessness, with or without disabilities, move as quickly as possible into permanent housing and achieve stability in that housing.
- Rental Assistance only for housing (cannot use Leasing or Operating).
- Monthly case management required.
- Limited to 24 months.
- **New RRH projects will only be considered if:**
 - **expansion projects that needs to expand supportive services budget to adhere to requirements.**
 - **DV RRH Bonus project**

RRH: PASSING HUD THRESHOLD REVIEW

HUD **project quality threshold** for new Rapid Rehousing projects - must receive at least **4 out of 6 points to pass threshold**.

- 1 point - The **provision of tenant-based rental assistance** will help individuals and families **achieve self-sufficiency** within 24 months.
- 2 points - The type of **supportive services and assistance** that will be offered to program participants (e.g., case management, substance use treatment, mental health treatment, and employment assistance) will ensure that the participant is able to successfully **obtain self-sufficiency and exit homelessness**.
- 1 point – The applicant has previously operated a homelessness project with **at least 50% exits to permanent housing within 24 months and 50% exits with employment income** or has a plan in place.
- 1 point - The average **cost per household served is reasonable**, consistent with 2 CFR 200.404.
- 1 point - 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.

TRANSITIONAL HOUSING (TH)

- The TH program component is described by the CoC Program Interim Rule as follows: “TH facilitates the movement of homeless individuals and families to PH within 24 months of entering TH.”
- Non-profits cannot directly administer Rental Assistance.
 - Non-profits can apply for Rental Assistance, but must partner/contract with a State, unit of local government, or Public Housing Authority to administer.
 - Administering rental assistance includes:
 - Contracting for and making rental assistance payments to the landlord
 - Conducting the Housing Quality Inspections (HQS) and eventually NSPIRE inspections
 - Calculate program participant’s rent contribution, including utility allowance (if applicable)
 - Verify rent reasonableness

TRANSITIONAL HOUSING

- TH projects can cover housing costs and accompanying supportive services for program participants for up to 24 months.
- Participants in a TH project must have a signed lease, sublease, or occupancy agreement with the following requirements:
 - An initial term of at least one month
 - Automatically renewable upon expiration, except by prior notice by either party
 - A maximum term of 24 months
- Per HUD: TH participants may remain in the project past 24 months if appropriate permanent housing has not been identified or if more time is needed for the household to achieve independence. However, HUD may discontinue TH funding if more than half of the households have exceeded 24 months.
 - Specific maximum length of stay will be set by the CoC Written Standards.

TH: PASSING HUD THRESHOLD REVIEW

HUD **project quality threshold** for Transitional Housing projects - must receive at least **6 out of 8 points to pass threshold**.

- 2 points - 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**.
- 1 point - The applicant has **prior experience** operating transitional housing or other projects that have successfully helped homeless individuals and families **exit homelessness within 24 months** *or has a plan in place to ensure homeless individuals and families will exit homelessness within 24 months*.
- 1 point - 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.
- 1 point - 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.
- 1 point - Demonstrate the **average cost per household served for the project is reasonable**, consistent with 2 CFR 200.404.

CONTINUED...

TH: PASSING HUD THRESHOLD REVIEW

HUD **project quality threshold** for Transitional Housing projects - must receive at least **6 out of 8 points to pass threshold**.

- 2 points –
 - Describe how the proposed project will:
 - **assess the service needs** of program participants,
 - and **provide individualized services** for program participants during their time in Transitional Housing that will **result in at least 20 hours per week of engagement** in services, activities or employment for all program participants, **except for a program participant over age 62 or who is an individual with handicaps** as defined in 24 CFR 8.3 or a with a **developmental disability** as defined under 24 CFR 578.3 (examples of services or activities include case management, counseling, treatment, volunteering, work therapy, education, job training, community- building activities, etc.) **Employment may contribute to the 20 hours per week** of engagement. The project description provided here **does not constitute a reporting or documentation requirement**.
 - Indicate that the proposed project will **create service plans** for each program participant that include:
 - the **services to be provided, when and how often** services will be provided, **by whom** all services will be provided;
 - program **participant goals, strategies** for achieving those goals, and **target dates** for achievement to focus on **improved health and wellness, housing stability, and increased employment income** leading to financial stability and self-sufficiency.

- SSO program component is described by the CoC Program Interim Rule as follows: “Supportive Service Only (SSO). Funds may be used ... to **provide supportive services to unsheltered and sheltered homeless persons for whom the recipient or subrecipient is not providing housing or housing assistance.** SSO includes street outreach.”
- [HUD FAQs](#) doc: “SSO projects provide supportive services such as street outreach, treatment, healthcare, job training, or childcare to sheltered and unsheltered homeless individuals and families. **SSO projects only provide supportive services, and do not provide housing or housing assistance, such as rental assistance.**”
- Supportive services may be offered in a structure or structures at one central site, or in multiple buildings at scattered sites where services are delivered. Projects may be operated independent of a building (e.g., street outreach) and in a variety of community-based settings, including in homeless programs operated by other agencies.

SUPPORTIVE SERVICES ONLY STANDALONE (SSO)

- Examples of SSO projects might include mobile street outreach or co-response outreach teams, a navigation center, a behavioral healthcare clinic, a dental clinic, a job training program inside of a shelter, or childcare on-site at a shelter.
- SSO projects can serve individuals residing in shelter, including shelters operated by the SSO recipient
- New SSO projects may serve persons who qualify as homeless under paragraphs (1), (2), or (4) of 24 CFR 578.3.
 - SSO projects are designated as serving those experiencing unsheltered and sheltered homelessness so it is unclear if Category 2 can be served in SSO.
<https://files.hudexchange.info/resources/documents/coc-program-sso-housing-component-decision-tool.pdf>:
"Households at risk of homelessness who do not meet the definition of homelessness may not be served by CoC Program-funded SSO projects."

SUPPORTIVE SERVICES ONLY STANDALONE (SSO)

The CoC Interim Rule lists Supportive Services eligible activities/costs as follows:

- annual assessment of service needs,
- assistance with moving costs,
- case management,
- child care,
- education services,
- employment assistance and job training,
- food,
- housing search and counseling services,
- legal services,
- life skills training,
- mental health services,
- outpatient health services,
- outreach services,
- substance abuse treatment services,
- transportation,
- utility deposits, and
- costs related to direct provision of services

**SUPPORTIVE
SERVICES
ONLY
STANDALONE
(SSO)**

SSO STANDALONE: PASSING HUD THRESHOLD REVIEW

HUD **project quality threshold** for Supportive Service Only (SSO) Standalone projects - must receive at least **4 out of 5 points to pass threshold**.

- 1 point - The Supportive Services project is **necessary to assist people in exiting homelessness, addressing barriers to stable housing** (e.g., substance use disorder, unemployment, childcare, etc.) and **increasing self-sufficiency** and the Recipient will **conduct an annual assessment** of the service needs of the program participants.
- 2 points - 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.
- 1 point - 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.
- 1 point - Demonstrate the **average cost per household** served for the project is **reasonable**.² CFR 200.404.

- For SSO Street Outreach projects, the NOFO references the outreach services activities stated in the CoC Interim Rule as the allowed activities:
 - “(13) **Outreach services.** The costs of activities to engage persons for the purpose of providing immediate support and intervention, as well as identifying potential program participants, are eligible.
 - (i) Eligible costs include the **outreach worker's transportation costs and a cell phone** to be used by the individual performing the outreach.
 - (ii) Component activities and services consist of: initial assessment; crisis counseling; addressing urgent physical needs, such as providing meals, blankets, clothes, or toiletries; actively connecting and providing people with information and referrals to homeless and mainstream programs; and publicizing the availability of the housing and/or services provided within the geographic area covered by the Continuum of Care.”

- It is unclear if SSO-SO projects can request funds for other types of supportive services in the project budget, or must have only Outreach Services in their budget, or have most funds devoted to Outreach Services.

SUPPORTIVE SERVICES ONLY STREET OUTREACH (SSO-SO)

SSO STREET OUTREACH: PASSING HUD THRESHOLD REVIEW

HUD **project quality threshold** for Supportive Service Only (SSO) Street Outreach projects - must receive at least **5 out of 6 points to pass threshold**.

- 1 point - 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.
- 2 points - 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.
- 1 point - Demonstrate that the applicant has a **history of, or plan for, 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**, and **not interfere or impede the enforcement** of local laws such as public camping and public drug use laws camping and public drug use laws *and assist/be willing to assist first responders in their efforts to engage homeless individuals*.
- 1 point - The applicant has **experience providing outreach services, or a plan for providing outreach services**, consistent with the activity description at 24 CFR 578.53(e)(13) *and has a plan for or 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.
- 1 point - The services provided are **cost-effective** consistent with 2 CFR 200.404.

(RENEWAL REALLOCATES TO
CREATE NEW WITH ONE YEAR
TO TRANSITION)

TRANSITION GRANTS

TRANSITION GRANTS

- Purpose = transition grant from one component type (e.g. PH) to a different component type (e.g. TH)
- A Transition Grant cannot also be an Expansion or a Consolidation.
- CoC Renewals can be reallocated the existing eligible renewal component to one of the **eligible new project components**: PSH, RRH, TH, SSO, SSO for Street Outreach.
- Must be the **same recipient** for the eligible renewal grant(s) being eliminated.
- The total budget amount cannot change.

TRANSITION GRANTS

- Will have **one year to fully transition** from the original component to the new component and this will take place during the transition grants normal operating year
- To create a Transition Grant, the CoC must **eliminate one or more projects** and use those funds to create the single, new transition grant.
- Transition grants in this Competition are **eligible for renewal** in subsequent fiscal years for eligible activities of the new program component.
- To be eligible to receive a transition grant, the renewal project applicant must have the consent of its Continuum of Care and meet the new project standards.

(RENEWAL EXPANDS
UNITS/SERVICES THROUGH
NEW PROJECT)

EXPANSION PROJECTS

EXPANSION PROJECTS

- HUD will allow project applicants to apply for new expansion projects
- A renewal project applicant may submit a new project application to expand current operations **by increasing services to be provided** to existing program participants.
- Under this type of request, for the new expansion project to be selected for conditional award, the renewal project application must also be selected for conditional award.
- Projects approved for an expansion will submit two project applications in e-snaps (HUD's application system): Renewal project application + New project application with the expanded activities

DV BONUS

DV BONUS: OVERVIEW

- \$104 million available nationally
 - Eastern PA CoC eligible for ~ \$4,359,194
- DV Bonus projects will be selected using the same Tier 1 and Tier 2 process as all other projects
 - As such, the CoC will consider applications from all eligible organizations. (details will be included in forthcoming RFP)
- DV Renewal projects cannot be reallocated to create new non-DV CoC projects. 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.
- Victim service providers must enter data into an HMIS-comparable database. The project budget may include HMIS funding to cover the cost of the HMIS-comparable database.

DV BONUS: OVERVIEW

A CoC may apply for the following types of projects dedicated to serving survivors of domestic violence, dating violence, sexual assault or stalking:

- **Rapid Re-housing (RRH) and Transitional Housing (TH) projects** (*CoC may submit more than 1 project provided that each application is for at least \$50K*)
 - Must demonstrate project applicant's experience serving individuals and families of persons experiencing trauma or a lack of safety related to, or fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking, and their ability to house survivors and meet safety outcomes.



QUESTIONS?

RENEWAL PROJECTS

RENEWAL PROJECT INFORMATION

- Awards HUD made under the CoC Program are eligible for renewal with FY 2026 CoC Program funds if they are currently in operation and expire in CY 2027: the period from January 1, 2027 through December 31, 2027.
- The NOFO states that HUD considers renewal projects as having met the **project eligibility threshold** requirements stated above through their previously approved grant application, unless they have information to the contrary. They cite the following as specific examples of information that may indicate a renewal does not meet the threshold requirements, but there may be others:
 - monitoring findings,
 - results from investigations by HUD's Office of Inspector General,
 - the recipient routinely does not draw down funds from eLOCCS at least once per quarter,
 - consistently late Annual Performance Report (APR) submissions

RENEWAL PROJECT INFORMATION

- Renewal projects must meet the project renewal thresholds outlined on pages 61-62 of the NOFO. These thresholds include HUD reviewing information available in eLOCCS, APRs submitted, and other information from the local HUD Field Office related to project performance.
- In addition, HUD reserves the right to reduce or reject projects that have issues related to lack of compliance, inadequate financial management, and other issues:
 - (a) outstanding obligation to HUD that is in arrears or for which a payment schedule has not been agreed upon;
 - (b) audit finding(s) for which a response is overdue or unsatisfactory;
 - (c) history of inadequate financial management accounting practices;
 - (d) evidence of untimely expenditures on prior award;
 - (e) history of other major capacity issues that have significantly affected the operation of the project and its performance;
 - (f) history of not reimbursing subrecipients for eligible costs in a timely manner, or at least quarterly; and
 - (g) history of serving ineligible program participants, expending funds on ineligible costs, or failing to expend funds within statutorily established timeframes.
 - (h) Compliance with audits for large grant recipients (over \$1,000,000 or more) as required by 2 CFR 200.501.

(MERGING MULTIPLE
PROJECTS INTO ONE SINGLE
PROJECT)

CONSOLIDATION

CONSOLIDATION

- The CoC will only be not be consolidating projects this year in order to have maximum flexibility to strategically rank projects.

NEXT STEPS

- Please read all emails from the CoC.
- Please know that things might change.
 - Lawsuit filed by NAEH, local jurisdictions and non-profits in Federal Court on June 22 challenging the NOFO
- Things are not moving forward as quickly as they have in the past-
 - HUD has not opened e-snaps or provided detailed instructions
 - We are working to identify strategies to maximize the amount of funding to be awarded through NOFO
- The CoC's Funding Committee and non-conflicted Governing Board members to make decisions... not Framework.

INFO FOR ALL APPLICANTS

- **SCORING**

- We are currently finalizing renewal scoring, which will be released next week.
- Changes were made to Renewal Scoring Criteria to align to NOFO, which will be posted to the CoC website.
- There will be an appeal window that will start upon the release of renewal scoring.

- **RENEWAL APPLICATION**

- Grant Inventory Worksheet – **BY FRIDAY** – please alert CoC if grant details are not correct
- Survey with supplemental questions – **to be circulated this week**
- E-snaps not yet open. Once open, instructions and timeline will be provided. May have additional webinar and/or office hours.

- **TRANSITION REQUIREMENTS - TBD**

INFO FOR RENEWAL PROJECTS

- All existing CoC grantees with Permanent Housing projects are advised to assess their ability to transition their projects to a Transitional Housing project.
- Your agency will need to make a firm decision about your ability, capacity, and willingness to transition your PSH or RRH project to a TH in the next few weeks.
- The CoC will communicate any decisions about priorities for the 60% of ARD allowed for Tier 1 as soon as we can to help you in your decision-making process **BUT grantee agencies should NOT wait to have these conversations internally.**
- **If you are unable to make decisions, your project funds may be reallocated.**

INFO FOR RENEWAL PROJECTS

- New project RFP to be released next week
- Framework will host new project webinar and/or office hours
- Please review all criteria HUD will use to conduct threshold and merit reviews

INFO RE NEW PROJECTS

RESOURCES

Renewal & New Project
Applications

RESOURCES

- The CoC will post materials related to the FY26 CoC NOFO/ Application here: <https://pennsylvaniacoc.org/eastern-pa-coc-fy26-coc-nofo-competition>
- HUD is posting materials to their website here: <https://www.hud.gov/hud-partners/coc-program-competition>
- Sign up for HUD emails: <https://www.hudexchange.info/homelessness-assistance/subscribe/>
- NAEH materials:
 - Summary/analysis: <https://endhomelessness.org/wp-content/uploads/2026/06/FY2026-Continuum-of-Care-Competition-NOFO-Analysis.pdf>
 - Impact analysis: <https://public.tableau.com/app/profile/naeh1302/viz/FY26NOFOImpactAnalysis/Dashboard1#1>

RESOURCES FOR E-SNAPS

Visit HUD's e-snaps 101 Toolkit page:

<https://www.hudexchange.info/resource/6170/esnaps-101-toolkit/>

- Glossary & icons explanations
- Checklist for getting started
- Creating an e-snaps user profile
- Requesting access to e-snaps
- Giving access to e-snaps to staff

Visit HUD's e-snaps 201 Toolkit page:

<https://www.hudexchange.info/resource/6171/esnaps-201-toolkit/>

- Updating the Applicant Profile
- Accessing project applications
 - Video
 - Written Guide
- Common e-snaps issues

HUD will provide “**Detailed Instructions**” and “**Navigational Guides**” – be sure to review those documents:

- Renewal and New Project Detailed Instructions and Navigational Guides **are/will be posted here:** <https://www.hud.gov/hud-partners/coc-program-competition>
- Main e-snaps CoC application page: <https://www.hudexchange.info/programs/e-snaps/>

Final questions?

Thanks for joining us today!

Send any additional questions to the CoC at
easterncoc@pennsylvaniaoc.org

QUESTIONS?