

ORANGE COUNTY CONTINUUM OF CARE

FY2025 AGENCY ADMINISTRATIVE REVIEW FOR THE REQUEST FOR PROPOSALS FOR CONTINUUM OF CARE BONUS, DOMESTIC VIOLENCE BONUS AND REALLOCATION PROJECTS DETAILED DESCRIPTION

Release Date

December 3, 2025

Submission Deadline

December 19, 2025, at 12:00 p.m. Pacific Time (PT)

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INTRODUCTION

Welcome to the Fiscal Year (FY) 2025 Agency Administrative Review for the Request for Proposals (RFP) for Continuum of Care (CoC) Bonus, Domestic Violence (DV) Bonus and Reallocation Projects (Agency Administrative Review) for the FY2025 Orange County CoC Program Notice of Funding Opportunity (NOFO) competition.

In Orange County, the CoC Board is the group of community stakeholders that set local priorities for the FY2025 CoC Program NOFO. As a result, the CoC Board, in collaboration with the County of Orange's Office of Care Coordination (County) as the Collaborative Applicant have set forth an RFP for new projects, including transition projects, and expansion projects being funded with CoC Bonus, DV Bonus and Reallocation funding and will evaluate submittals to ensure the most competitive application is put forth to HUD, consistent with HUD guidance and Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act regulations.

On December 8, 2025, **HUD withdrew the FY2025 CoC Program NOFO** and stated the intent to reissue a modified NOFO in advance of the deadline for obligation of available FY2025 funds. In response to the withdrawal of the NOFO, the request for new and renewal project applications is being paused, with an addendum to the FY2025 Agency Administrative Review for the RFP for CoC Bonus, DV Bonus and Reallocation Projects to allow for the evaluation of agencies' capacity to administer CoC Program Funding.

The materials related to the RFP for CoC Bonus, DV Bonus and Reallocation Projects will remain on the FY2025 CoC Program NOFO webpage for reference. Please reference the FY2025 RFP for CoC Bonus, DV Bonus and Reallocation Projects (FY2025 RFP) Detailed Description for more information about the RFP. The FY2025 RFP will provide the needed information on how to submit a New Project and/or New Expansion Project proposal for considerations to be funding through the FY2025 CoC Program NOFO. Note, the Office of Care Coordination will post an additional addendum to the RFP as more guidance is received from HUD.

Agencies wishing to submit a proposal as part of the FY2025 RFP for CoC Bonus, DV Bonus and Reallocation Projects are required complete the Agency Administrative Review as part of the submission process. Agencies who have already completed the Agency Administrative Review for CoC-Funded Agencies are excluded from this requirement.

AGENCY ADMINISTRATIVE REVIEW PROCESS

The general purpose of the Agency Administrative Review process is to assess agencies' capacity to administer CoC homeless service projects while complying with HUD requirements and to ensure that agencies can meet the threshold requirements to proceed with the RFP process.

If an agency plans to submit multiple Proposals in response to the FY2025 RFP, the agency will need to submit the needed documents to complete the Agency Administrative Review only once. The findings of the Agency Administrative Review may be utilized and referenced during future components of the CoC local competition process, including the evaluation of project proposal(s) in response to the FY2025 RFP.

NOTE: Submittals to both, the Agency Administrative Review and the project proposals in response to the FY2025 RFP, need to be considered for funding in response to the FY2025 CoC Program NOFO.

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The Agency Administrative Review process will also include a comprehensive review of the following:

1. Technical Requirements
2. Document Presentation Requirements
3. Timeliness

Additionally, the County reserves the right to administratively disqualify or penalize any agency and/or RFP Proposal that does not comply with the Technical Requirements, Document Presentation Requirements, and timeliness requirements.

Technical Requirements

1. One (1) electronic copy via Dropbox with completed Request for Proposals submittal – exhibits, attachments, and supporting documents – to be organized and separated per Document Presentation Requirements.
 - Note: Do not submit all Exhibits and Attachments as one condensed file. Each Exhibit and Attachment should be labeled as a separate file.
 - DropBox Instructions:
 - i. Create a DropBox account.
 - ii. Click [here](https://learn.dropbox.com/self-guided-learning/dropbox-fundamentals-course/how-to-use-dropbox) to view instructions on how to use Dropbox or visit <https://learn.dropbox.com/self-guided-learning/dropbox-fundamentals-course/how-to-use-dropbox>
 - iii. Option 1: Share files via Dropbox link to the following email addresses:
 1. CareCoordination@ceo.oc.gov
 2. felicia.boehringer@ceo.oc.gov
 3. jasmin.miranda@ceo.oc.gov
 - iv. Option 2: Copy the Dropbox link to the files and paste it into an email to the above email addresses.

Document Presentation Requirements

1. No late submissions will be accepted.
2. All sections must be numbered separately in accordance with the Document Checklist.
3. Most recent documentation must be submitted for each exhibit and attachment.
4. Do not leave any blank responses without an explanation (e.g., if the question is not applicable, indicate N/A).
5. All documents with a signature block must be signed by the authorized representative(s).
6. All required documents must be included and legible in the submission.

If the Agency Administrative Review submittal does not meet the Technical Requirements and/or Document Presentation Requirements, the overall score of the Agency Administrative Review will be negatively impacted.

The following is a list of the possible reductions an Agency may receive in their overall submittal of the Agency Administrative Review.

- Two (2) points reduction for late submittals
- One (1) point reduction for not meeting the Technical Requirements

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- One (1) point reduction for not meeting the Document Presentation Requirements
- One (1) point reduction for each incomplete or missing exhibit

REQUIRED DOCUMENTS

ATTENTION CURRENT CoC-FUNDED AGENCIES

Agencies that have submitted the FY2025 Agency Administrative Review for CoC-Funded Agencies do not need to complete this step. Agencies that have submitted FY2025 Agency Administrative Review for CoC-Funded Agencies only have to complete the FY2025 Request for Proposals – New Projects and Expansion Project Section.

ATTENTION ALL OTHER AGENCIES

If your agency did not submit FY2025 Agency Administrative Review for CoC-Funded Agencies during the FY2025 CoC Program NOFO cycle, please complete all required documents as listed.

The following documents must be submitted in addition to the proposed project information. Please note that the entire application packet is provided to be completed as needed.

- **FY2025 Agency Administrative Review for RFP For CoC Bonus, DV Bonus and Reallocation Projects Required Documents Checklist**
- **Exhibit 1: Agency Information Form**
 - ☐ **Attachment 1:** Organizational Chart – include Board of Director's body as it relates to the entire organization, and organization's staff names and titles/positions
 - ☐ **Attachment 2:** Board of Directors' Roster¹ and Resolution authorizing submittal of a new or expansion project application in response to the FY2025 CoC Program NOFO competition process
 - ☐ **Attachment 3:** State Certificate of Status, if applicable
 - ☐ **Attachment 4:** Agency's Code of Conduct
 - ☐ **Attachment 5:** 501(c)3 Certification, if applicable
- **Exhibit 2: Terms and Conditions**
- **Exhibit 3: Financial Assessment**
 - ☐ **Attachment 6:** Two most recent single audits², previously known as the OMB Circular A-133 audit, if applicable. If not applicable, please instead submit the two most recent agency financial audits by a certified public accountant (CPA)³

CoC PROGRAM COMPETITION PROCESS

¹ Under the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act, each agency is required to provide for the participation of not less than one individual with current or past lived experience of homelessness on the Board of Directors or other equivalent policymaking entity of the agency, to the extent that such entity considers and makes policy decisions regarding any project, supportive services, or assistance provided.

² Single audits must be dated 2022 or later.

³ Financial audits must be dated 2022 or later.

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The local CoC Program Competition process consists of all HUD required processes and documentation as well as local completion factors and the completion of an electronic application in the e-snaps system. The following are HUD Threshold Requirements that must be met by the applying agency to be considered as an eligible applicant under the FY2025 COC Program NOFO.

HUD Threshold Requirements

The FY2025 CoC Program NOFO requires all project applicants to meet threshold requirements as listed in Sections V.A.4.a. and V.A.4.b.:

- a. **Ineligible Applicants.** HUD will not consider a project application from an ineligible project applicant.
- b. **Project Eligibility Threshold.** HUD will review all projects to determine if the projects meet the following eligibility threshold requirements on a pass/fail standard.
 1. Project applicants and potential subrecipients must meet the eligibility requirements of the CoC Program as described in the Act and the Rule and provide evidence of eligibility required in the application (e.g., nonprofit documentation).
 2. Project applicants and subrecipients must demonstrate the financial and management capacity and experience to carry out the project as detailed in the project application and the capacity to administer federal funds. Demonstrating capacity may include a description of the applicant and subrecipient experience with similar projects and with successful administration of SHP, S+C, or CoC Program funds or other federal, state, local, or private resources.
 3. Project applicants must submit the required certifications specified in this NOFO.
 4. The population to be served must meet program eligibility requirements as described in the Act, the Rule, and section III.G.10 of the NOFO.
 5. Project applicants, except Collaborative Applicants that only receive awards for CoC Planning costs and, if applicable, UFA Costs, must agree to participate in a local HMIS system. However, in accordance with Section 407 of the Act, any victim service provider that is a recipient or subrecipient must not disclose, for purposes of HMIS, any personally identifying information about any client. Victim service providers must use a comparable database that meets the needs of the local HMIS.
 6. Project applicants must certify affirmatively to the following:
 - i. The project applicant will not engage in racial preferences or other forms of illegal discrimination.
 - ii. 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 harm reduction.
- c. **Project Quality Threshold.** HUD will review all new project applications to determine if they meet the following project quality threshold requirements HUD will not award funds to a new project unless the project was created through reallocation, or 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 indicated on V.A.4.b. (page 54) of the FY2025 CoC Program NOFO, HUD will assess all new projects for the following minimum project eligibility, capacity, timeliness,

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and performance standards. To be considered as meeting project quality threshold, all new projects must meet the following criteria:

1. Project applicants and potential subrecipients must have satisfactory capacity, drawdowns, and performance for existing grant(s) funded under the CoC Program, as evidenced by timely reimbursement of subrecipients, regular drawdowns, and timely resolution of any monitoring findings; however, this does not apply to project applicants who have never received a CoC Program funded project
2. Project applicants must demonstrate their ability to meet all timeliness standards per 24 CFR 578.85. HUD reserves the right to deny a funding request for a new project, if the request is made by an existing recipient that HUD finds to have significant issues related to capacity, performance, unresolved audit, or monitoring findings related to one or more existing grants; or does not routinely draw down funds from eLOCCS at least once per quarter. HUD also reserves the right to withdraw funds if no APR is submitted on the prior grant.

BRIEF OVERVIEW OF REQUIRED DOCUMENTS

Agency Information Form (Exhibit 1)

Exhibit 1 captures information regarding the applicant agency including agency address and points of contacts.

Organizational Chart (Attachment 1)

Attachment 1 provides a visual representation of the agency, and should include the Board of Director's body as it relates to the entire organization, the organization's title and positions, and staff names.

Board of Director's Roster and Resolution (Attachment 2)

The Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act states that each CoC Program funding recipient or project sponsor is required to provide for the participation of not less than one homeless individual on the board of directors or other equivalent policymaking entity of the recipient or project sponsor, to the extent that such entity considers and makes policy decisions regarding any project, supportive services, or assistance provided. The Attachment should indicate that the board of directors includes at least one person with lived experience of homelessness. The board of directors' resolution portion of the attachment should clearly indicate that the agency is authorized to apply for renewal project funding as part of the FY2025 CoC Program NOFO competition. If an authorized representative or signatory is named in the board of directors' resolution, the authorized representative or signatory's name should align with the authorized representative indicated in Exhibit 1.

State Certificate of Status, if applicable (Attachment 3)

The Certificate of Status certifies to the current status of the agency (e.g., active/good standing, suspended, dissolved, cancelled, etc.). Certificates of Status (Online) - certificates of status are available at bizfileOnline.sos.ca.gov.

Agency's Code of Conduct (Attachment 4)

Attachment 4 evidences an agency's Code of Conduct. The Attachment 4 instructions are included on the [FY2025 CoC NOFO webpage](#) for review.

501(c)3 Certification, if applicable (Attachment 5)

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The 501(c)3 Certification recognizes exempt status under IRC Section 501(c)(3) by the Internal Revenue Service (IRS).

Terms and Conditions (Exhibit 2)

Exhibit 2 outlines the terms and conditions of the RFP for the FY2025 CoC Program NOFO, as well as outlines the applicant agency's understanding of the Orange County CoC's requirements if and when the proposed project is awarded by HUD. Exhibit 2 is to be signed by the person preparing the proposal in response to the RFP and by the Authorized Representative – the Chief Executive Officer or Executive Director of the agency.

Financial Assessment (Exhibit 3)

Exhibit 3 evaluates an agency's financial information, such as the Employer or Taxpayer Identification Number (EIN/TIN), System Award Management (SAM), whether an agency has unresolved fiscal, reporting, or program issues with any of its funding sources, and if an agency has had to return any federal, state, or local funds to any funders within the last three (3) years.

Two most recent single audits (Attachment 6)

Each agency must submit two most recent single audits, previously known as the OMB Circular A133 audit, if applicable. If not applicable, please instead submit the two most recent agency financial audits by a certified public accountant (CPA).

REVIEW PROCESS

Agencies seeking to apply for the RFP for CoC Bonus, DV Bonus, Reallocation projects must submit materials as described in this solicitation. Agency Administrative Review submissions that are late, incomplete, or substantially deficient may not be advanced to the RFP for CoC Bonus, DV Bonus, Reallocation projects process. All applications will be reviewed to ensure they meet HUD threshold requirements and project quality threshold standards. Any correctable deficiencies will be identified, and selected applicants will have the opportunity to submit corrected documents before the final CoC application is submitted to HUD.

SUBMISSION

It is the sole responsibility of the Agency to ensure that submission is prior to the due date and time. The FY2025 Agency Administrative Review for proposals applying for CoC Bonus, DV Bonus, Reallocation funding including all Exhibits and Attachments must be submitted by 12:00 p.m. PT on December 19, 2025, via Dropbox, using the following instructions.

Option 1: Share files via Dropbox link to the following email addresses:

1. CareCoordination@ceo.oc.gov
2. felicia.boehringer@ceo.oc.gov
3. jasmin.miranda@ceo.oc.gov

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Option 2: Copy the Dropbox link to the files and paste it into an email to the above email addresses.

RIGHT OF ORANGE COUNTY CONTINUUM OF CARE TO WAIVE IRREGULARITIES

The Orange County Continuum of Care reserves the right to:

1. Withdraw this solicitation at any time without prior notice and, furthermore, makes no representation that any contract occurs and that funds will be awarded by HUD to any respondent to this solicitation.
2. Waive any irregularities in the 2025 RFP process and reject any and all submissions not in the best interest of the Continuum of Care.
3. Request additional information and material. In addition, the application from HUD may require and warrant the request of supplemental material.
4. Not renew grants or proposals that have exhibited serious capacity issues in prior grants, including performance and financial problems, HMIS participation, or unresolved monitoring issues, or based on the best interest of the entire CoC Application. HUD will review applications and make the final funding decision.
5. Retain all submitted applications for a period of at least three hundred sixty-five (365) calendar days from the closing date and time of receipt. Selection or rejection of an application does not affect these rights.

FURTHER QUESTIONS AND ADDITIONAL RESOURCES

The County of Orange is available to answer questions on the FY2025 Agency Administrative Review for Proposals for CoC Bonus, DV Bonus, and Reallocation Projects, submission deadlines, process, or to provide copies of Agency Administrative Review materials specific to the Orange County CoC. For further questions or technical assistance, the Office of Care Coordination at CareCoordination@ceo.oc.gov and Carbon Copy (Cc) Felicia Boehringer (felicia.boehringer@ceo.oc.gov) and Jasmin Miranda (jasmin.miranda@ceo.oc.gov).

Specific questions regarding a HUD grant amount, HUD guidelines etc. should be directed to your local HUD field office representative. **Please DO NOT contact the HUD office regarding Orange County's local application deadlines or process**, as the County of Orange is available to answer those questions.

ADDITIONAL INFORMATION

Agencies will be required to comply with terms set forth by the CoC and HUD. In addition, all applicants are strongly advised to review all applicable terms, conditions, and federal requirements. It is strongly recommended that you obtain, and review information related to the CoC Program, the CoC Interim Rule, and the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act Regulations, along with any other related documents prior to completion of this FY2025 Agency Administrative Review for Proposals for CoC Bonus, DV Bonus, and Reallocation Projects. In addition, HUD will provide updates via their website at <https://www.hud.gov/hud-partners/community-coc>.