

**ORANGE COUNTY
CONTINUUM OF CARE**

**FY2025
CONTINUUM OF CARE
RENEWAL PROJECT APPLICATION
DETAILED DESCRIPTION**

Released

December 2, 2025

Addendum #1

December 23, 2025

Submission Deadline

January 2, 2026, at 12:00 p.m. (PT)

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ORANGE COUNTY CONTINUUM OF CARE FY2025 CoC RENEWAL PROJECT APPLICATION DETAILED DESCRIPTION

INTRODUCTION

On an annual basis, the U.S. Department of Housing and Urban Development (HUD) provides funding for homeless service programs authorized under the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act through a Continuum of Care (CoC) Program Notice of Funding Opportunity (NOFO) process. HUD announced the release of the Fiscal Year (FY) 2025 CoC Program Competition NOFO (FY2025 CoC Program NOFO) on November 13, 2025, as authorized by the Full-Year Continuing Appropriations and Extensions Act, 2025, which supersedes and rescinds the FY 2024 and FY 2025 CoC Program NOFO and includes several changes.

On December 8, 2025, HUD withdrew the FY 2025 CoC Program NOFO and stated the intent to reissue a modified NOFO in advance of the deadline for obligation of available FY2025 funds. The FY 2025 CoC Program NOFO is the subject of a couple lawsuits which have resulted in federal court action and involvement in the matter.

On the evening of December 19, 2025, HUD reissued the modified [FY 2025 CoC Program NOFO](#) for public review. Due to a preliminary injunction, the NOFO cannot be implemented or enforced until further court order. However, the deadline for “normal track” applications is listed as January 28, 2026, at 5:00 p.m. PT. The timeline for the modified NOFO requires CoCs to proceed swiftly with next steps, while recognizing the NOFO is still in active litigation.

On December 23, 2025, a federal court issued a written preliminary injunction that affects the HUD’s CoC funding process. HUD is required to take steps to process eligible renewal projects for FY 2025 using the FY 2024–2025 CoC Program NOFO rules. However, the court made clear that this order does not require HUD to award or obligate funds yet.

In response, the Office of Care Coordination as the Collaborative Applicant is **resuming the local competition for new and renewal project applications with an addendum to include changes as outlined below and extend the submission deadlines to Wednesday, December 31, 2025, at 12:00 p.m. PT. Given the uncertainty of the FY 2025 CoC Program renewal process, the Office of Care Coordination is asking all eligible renewal projects to submit CoC Renewal Project Application(s) to the Orange County CoC for evaluation to determine renewal status. The evaluation process helps to ensure a high standard of quality for renewal applicants and may also be used to make funding reallocation decisions at the local level. All renewal projects are currently under review for inclusion in the FY2025 CoC Program Priority Listing. If the CoC Board reallocates any projects or portion of a project, the agencies will be notified.**

However, given the programmatic changes and policy direction as outlined in the two FY 2025 CoC Program NOFOs previously issued, the following is also being considered as contingency planning for the Orange County CoC:

- Agencies voluntarily reallocating a portion or the entirety of their Permanent Housing (PH) Renewal Project(s) funding, including Joint Transitional Housing and Permanent Housing – Rapid

Rehousing (Joint TH/RRH), Rapid Rehousing (RRH) and Permanent Supportive Housing (PSH) will have to submit a new Project Proposal in response to the FY2025 Request for Proposals (RFP) for Permanent Housing Project Proposals that will be released in late December 2025.

- *Reallocation funds will be prioritized for current CoC-Funded agencies who voluntarily select to reallocate their Renewal Projects, in part or in whole, during the FY2025 CoC Program competition. CoC-Funded agencies will be prioritized for reallocation funds through the FY2025 Request for Proposals (RFP) for CoC Bonus, Domestic Violence Bonus and Reallocation Projects and the FY2025 RFP for Permanent Housing Project Proposals consistent with the amount of funds voluntarily reallocated in support of meeting the 30 percent cap of Permanent Housing.*

The County of Orange's Office of Care Coordination (County) as the Collaborative Applicant for the Orange County CoC facilitates this local renewal process in collaboration with the CoC Board. In Orange County, the CoC Board is the group of community stakeholders that sets local priorities for the CoC Program NOFO funding. The CoC Board and the CoC NOFO Ad Hoc, in collaboration with County, will evaluate FY2025 CoC Program NOFO regulations along with agency and project performance on the past grant(s) to ensure a successful and competitive application is submitted to HUD. **Please note that renewal funding is not guaranteed upon submission of the FY2025 CoC Renewal Projects Application(s) to the County.**

RENEWAL ELIGIBILITY

An agency and its related renewal project(s) may not be recommended for renewal by the Orange County CoC if the agency has:

- a history of past and/or current contract non-compliance with HUD,
- a termination for cause by any other funding source,
- disallowed cost with the CoC Program or any other funding sources,
- significant financial audit findings, capacity concerns, and/or
- low project performance.

A project is considered eligible for renewal in the FY2025 CoC Program NOFO by the Orange County CoC if the project:

- has or will have an executed grant agreement with HUD by December 31, 2026, and have an expiration date in in Calendar Year 2025 (between January 1, 2025, and December 31, 2026),
- has been included on the Grant Inventory Worksheet (GIW),
- has met all performance spending and capacity requirements, and
- has met any other requirements outlined in the FY2025 CoC Program NOFO.

APPLICATION REVIEW PROCESS

The Orange County CoC will complete its evaluation of agencies and Renewal Projects through a three-step process which will support with determining which agencies and projects are eligible to submit an application in the FY2025 CoC Program NOFO.

1. Intent to Renew Survey
2. Agency Administrative Review
3. Renewal Project Application

At the completion of the Intent to Renew Survey, Agency Administrative Review, and the Renewal Project Application, the Orange County CoC, CoC Board and CoC NOFO Ad Hoc will establish the FY2025 CoC Application Renewal Project Evaluation Process based on FY2025 CoC Program NOFO requirements and project priorities. A copy of these policies will be distributed to the agencies. Additionally, all agencies will

be notified of their project(s) rank and scores through a Project Priority Listing after it has been evaluated and approved by County, the CoC NOFO Ad Hoc, and the CoC Board.

Agencies that fail to submit the Renewal Project Application will forfeit their project(s) funding, and their funds will be reallocated. Consequently, the Orange County CoC will prepare policies, funding priorities and conduct a Request for Proposal (RFP) to reallocate funding for projects that are not eligible to renew, are voluntarily reallocated, and/or are approved for reallocation by the CoC Board.

The Orange County CoC will also utilize the Homeless Management Information System (HMIS) to review data concerning individuals and families experiencing homelessness or chronic homelessness that is collected by CoC funded projects seeking to renew funding. The HMIS data tracks the progress of CoC funded programs in meeting CoC and project-specific performance goals, to support communitywide planning, and to identify resources to address homelessness. The data in HMIS will be used to evaluate project performance for CoC Renewal Projects. The performance measures and thresholds for the Permanent Supportive Housing (PSH) renewal projects will be presented to the CoC Board for approval and inclusion in the FY2025 CoC Program NOFO Rating and Ranking process. HMIS and Supportive Services Only (SSO) projects will also be evaluated for renewal but will not include evaluation against project performance measures and thresholds. CoCs need high-quality HMIS data to complete the homelessness components of the Consolidated Plan and to meet HUD reporting requirements, such as the required Point In Time (PIT) Count, Annual Performance Report (APR) and Longitudinal Systems Analysis (LSA). Finally, HMIS data is essential to documenting a CoC's qualifications as a high-performing community.

Evaluation of Application Components

Each agency and Renewal Project(s) will be rated and ranked per the CoC Board approved policy, HUD requirements, and guidelines from the FY2025 CoC Program NOFO.

The following application components will be utilized in the scoring process:

1. Agency Administrative Review
2. Project Submittal in E-snaps
3. Project Performance
4. Return to Homelessness and Increased Employment Income
5. Project Effectiveness
6. Coordinated Entry System Participation
7. Unspent Funds
8. Recovery and Supportive Service Participation
9. Other local priorities, as approved by the CoC Board
10. Other HUD requirements, as required by FY2025 CoC Program NOFO

Once an agency has completed the Intent to Renew Survey, Agency Administrative Review, and the Renewal Project Application and is being recommended by the CoC Board for inclusion in the CoC Program application to HUD, the Renewal Project will be included in the Project Priority Listing.

Project Priority Listing

HUD will continue the Tier 1 and Tier 2 funding selection process for the FY2025 CoC Program NOFO competition. HUD will establish Tier 1 and Tier 2 amounts for each CoC, based on each CoC's Annual Renewal Demand (ARD). All Renewal Project Applications must be ranked in either Tier 1 or Tier 2 of the Project Priority Listing as described in the FY2025 CoC Program NOFO and approved by the CoC Board as recommended by CoC NOFO Ad Hoc and County. The County will then submit the Priority Listing to HUD as approved by the CoC Board.

On an annual basis, HUD posts a report that lists each CoC's Preliminary Pro Rate Needs (PPRN), estimated ARD, Tier 1, CoC Planning Grant, CoC Bonus, and Domestic Violence (DV) Bonus funding amounts available. The [Estimated ARD Report](#) is available on HUD's website. HUD emailed the final Grant Inventory Worksheet (GIW) to CoC Collaborative Applicants in July 2025 as an alternative to posting them publicly on HUD's website. As part of HUD's new priority towards Transitional Housing (TH) and Supportive Services Only (SSO) projects, no more than 30 percent of a CoC's ARD will be allowed to fund Permanent Housing Projects, including Permanent Supportive Housing (PSH), Rapid Re-housing (RRH) and Joint Transitional Housing and Permanent Housing/Rapid Re-housing (Joint TH-PH/RRH) projects.

Tier 1 is equal to 30 percent of the CoC's ARD. Project applications in Tier 1 will be conditionally selected from the highest scoring CoC to the lowest scoring CoC, provided the project applications pass both project eligibility and project quality threshold review, and if applicable, project renewal threshold. Any type of new or renewal project application can be placed in Tier 1, except a CoC Planning Grant which is not ranked.

Tier 2 is the difference between Tier 1 and the sum of the renewal, reallocation, CoC Bonus, and DV Bonus funds that a CoC can apply for but does not include CoC Planning Grant. Project applications placed in Tier 2 will be assessed for project eligibility and project quality threshold requirements, and if applicable, project renewal threshold requirements, and funding will be determined using the CoC Application score as well as the factors listed in Section V.D.3.b. of the FY2025 CoC Program NOFO.

HUD will award a point value to each new and renewal project application that is in Tier 2 using a 100-point scale, and conditionally select applications in Tier 2 using this point value from the highest scoring project application to the lowest:

- a. CoC Score – Up to 50 points in direct proportion to the score received on the CoC Application (e.g., if a CoC received 65 out of 130 points on the CoC Application, the project application would receive 25 out of 50 points for this criterion).
- b. CoC Project Ranking – Up to 40 points for the CoC's ranking of the project application(s). To consider the CoCs ranking of projects, point values will be assigned directly related to the CoCs' ranking of project applications. The calculation of point values will be 40 times the quantity $(1-x)$ where x is the ratio of the cumulative funding requests for all projects or portions of projects ranked higher by the CoC in Tier 2 plus one half of the funding of the project of interest to the total amount of funding available in Tier 2 for the CoC. (e.g., if a CoC is eligible to apply for projects totaling \$500,000 in Tier 2 and applies for 5 projects ranked in Tier 2 of \$100,000 each: the highest-ranked project would receive 36 points, and then the subsequently ranked projects would receive 28, 20, 12, and 4 points).
- c. Service Participation – Up to 10 points for projects that have or will incorporate supportive service participation requirements in their program design, based on individual need and evidenced in an occupancy agreement or equivalent document.

If a project application straddles the Tier 1 and Tier 2 funding line, HUD will conditionally select the project up to the amount of funding that falls within Tier 1. Using the selection criteria listed in Section V.D.3.b. in FY2025 CoC Program NOFO, HUD may fund the Tier 2 portion of the project. If HUD does not fund the Tier 2 portion of the project, HUD may award the project at the reduced amount based on the amount of funding that falls within Tier 1, provided the project is still feasible with the reduced funding (e.g., is able to continue serving homeless program participants effectively). Additionally, if at any point, HUD selects Permanent Housing projects in an amount more than 30 percent of a CoC's ARD, HUD will remove all

remaining unselected Permanent Housing projects from the CoC's Priority Listing, recalculate the Tier 2 project score, and continue selection.

Reallocation

Reallocation is a HUD-approved process that allows the CoC to improve its effectiveness by strategically aligning limited funding to serve people experiencing homelessness with the highest needs. CoCs are not only encouraged, but also expected to utilize the reallocation process to adapt to shifts within the local homeless service system. It is also a local process to reallocate funding from poor performing projects that do not achieve and/or support CoC's system performance, objectives, and goals.

The CoC Board approved a [CoC Reallocation Strategy](#) at the June 25, 2025, meeting, which considers both project performance and unspent funds. Applicants are encouraged to review the CoC Reallocation Strategy on the [County's website](#) to understand how Renewal Projects will be evaluated. Renewal Projects may be reallocated in part or in whole through the local renewal process if:

- The project is not eligible to be included in the CoC Program Application; and/or
- The project has significant funds that are unspent from previous years, as detailed in the CoC Reallocation Strategy; and/or
- The project has low performance as detailed in the CoC Reallocation Strategy and/or is not meeting CoC objectives and priorities.

To assess the level and extent of unspent funds, the Orange County CoC, in collaboration with the County and HUD, will be evaluating any unspent funds from agencies and renewal projects for the last three completed (3) grant terms and evaluating project information for the current grant.

PROJECT RENEWAL APPLICATION(S) PROCESS

The Project Renewal Application(s) 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.

Technical Requirements

1. One (1) electronic copy submitted via Dropbox. Exhibits and attachments, and other required documents are 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](#) 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. The electronic submissions must include a separate file for each Exhibit and Attachment and must be labeled accordingly.
2. Most recent documentation is submitted for each Exhibit and Attachment.
3. Do not leave any blank responses without an explanation, even if question is not applicable (e.g., if the question is not applicable, indicate “N/A”).
4. All documents with a signature block must be signed by the authorized representative(s), as listed in the Agency Administrative Review Exhibit 1, Agency Contacts. Digital/DocuSign signatures are acceptable.
5. All supporting documents must be included in the submission. Note, if e-snaps application has not been released by HUD prior to the Renewal Project application submission deadline, the application will not be marked incomplete. Export of e-snaps and related attachments, however, must be submitted for review no later than January 15, 2026, pending release of project application on e-snaps platform.
6. All supporting documents must be legible.

Project Eligibility Thresholds

The County and HUD will review all agencies and the Renewal Projects to determine if they meet the following project eligibility threshold requirements on a pass/fail standard. If the applicable standards are not met for a project, the project will be rejected.

1. The project requesting renewal funding through its previously approved grant application has no issues or concerns related to monitoring findings and/or results from investigations by HUD's Office of Inspector General, the agency routinely draws down funds from electronic Line of Credit Control System (eLOCCS) at least once per quarter and meets Annual Performance Report (APR) submissions deadlines.
2. Agency and potential subrecipients must meet the eligibility requirements of the CoC Program as described in subtitle C of title IV of the McKinney-Vento Homeless Assistance Act, (42 U.S.C. 11381–11389) and the CoC Program rule found in 24 CFR part 578 (the Rule) and provide evidence of eligibility required in the application.
3. Agency and potential subrecipients 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.
4. Project application must submit the required certifications specified in the FY2025 CoC NOFO via e-snaps.
5. The population to be served must meet program eligibility requirements as described in the Act, the Rule, and Section III.G.10. of the FY2025 CoC Program NOFO.
6. Renewal projects 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.

Project Quality Threshold

The County and HUD will review all agencies and their renewal project applications to determine if they meet the following project quality threshold requirements. Additionally, the housing and services proposed must be appropriate to the project. Any project requesting renewal funding will be considered as having met project quality threshold requirements through its previously approved grant application unless information to the contrary is received and/or if the renewal project has compliance issues which

results in the project not operating in accordance with the need of the program participants and the community. All renewal projects must meet all the following criteria:

1. Agency and potential subrecipients must have satisfactory capacity, drawdowns, and performance for existing grant(s) that are funded under the CoC Program, as evidenced by timely reimbursement of subrecipients, regular drawdowns, and timely resolution of any monitoring findings.
2. Agency must demonstrate ability to meet all timeliness standards per 24 CFR 578.85 for the renewal project. Agency must demonstrate that they have met all renewal project threshold requirements of this NOFO.

Project Renewal Threshold (per FY2025 CoC Program NOFO)

The CoC must consider the need to continue funding for projects expiring in Calendar Year 2026 (January 1, 2026, To December 31, 2026). Renewal projects must meet minimum project eligibility, capacity, timeliness, and performance standards identified in the FY2025 CoC Program NOFO or the project will be rejected from consideration for renewal funding.

1. When considering renewal projects for award, HUD will review information in eLOCCS; Annual Performance Reports (APRs); and information provided from local HUD Community Planning and Development (CPD) Field Office, including monitoring reports and audit reports, as applicable, and performance standards on prior grants, and will assess projects on a pass/fail basis using the following criteria:
 - a. Whether the project applicant's performance met the plans and goals established in the initial application, or grant as amended;
 - b. Whether the project applicant demonstrated all timeliness standards for grants being renewed have been met, including the standards for the expenditure of grant funds;
 - c. The project applicant's performance in assisting program participants to achieve and maintain self-sufficiency and independent living and record of success, except dedicated HMIS projects are not required to meet this standard; and
 - d. Whether there is evidence that a project applicant has been unwilling to accept technical assistance, has a history of inadequate financial accounting practices, has indications of project mismanagement, has a drastic reduction in the population served, has made program changes without prior HUD approval, or has lost site control of a project.
2. **HUD reserves the right to reduce or reject a funding request from the project applicant** for the following reasons:
 - 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 sub-recipients for eligible costs in a timely manner, or at least quarterly;
 - g. History of serving ineligible program participants, expending funds on ineligible costs, or failing to expend funds within statutorily established timeframes;

- h. Evidence that the project has previously or currently conducts activities that subsidize or facilitate racial preferences or other forms of illegal discrimination or conduct activities that rely on or otherwise use a definition of sex other than as binary in humans.
- i. Evidence that the project operates drug injection sites or “safe consumption sites,” knowingly distributes drug paraphernalia on or off the property under their control, permits the use or distribution of illicit drugs on property under their control, or conducts any of these activities under the pretext of “harm reduction.”

REQUIRED DOCUMENTS FOR THE RENEWAL PROJECT APPLICATION(S)

Please complete all the required exhibits, attachments and forms listed below for each project renewal application being submitted.

- **Exhibit 5: Project Information Form**
 - **Attachment 1:** Certification of Consistency in the Consolidated Plan
 - **Attachment 2:** Environmental Review – Limited Scope Environmental Review Form, Environmental Review of Categorically Excluded Not Subject to Section 58.5, Environmental Clearance Letter, or signed Environmental Review Documentation
 - **Attachment 3:** 25% Match Documentation – including letters of match commitment and/or In-Kind Memorandum of Understanding (MOU)
- **Exhibit 6: Project Effectiveness**
- **Exhibit 7: Recovery and Supportive Service Participation**
 - **Attachment 4:** Supportive Services Agreement – this may include contract, occupancy agreement, lease or equivalent
- **HUD CoC Project Application (e-snaps)¹**

BRIEF OVERVIEW OF REQUIRED DOCUMENTS

Project Information Form (Exhibit 5)

Exhibit 5 captures information on the proposed project to ensure that project design meets the needs of the target population as outlined in the renewal project application and the FY2025 CoC Program NOFO, as well as evaluates how the proposed project will operate within the Orange County CoC and improve outcomes for people experiencing homelessness.

Certification of Consistency with Consolidated Plan (Attachment 1)²

Each agency must submit a certification by the jurisdiction in which the renewal project(s) will be located that the agency’s application for funding is consistent with the jurisdiction’s HUD-approved consolidated plan. The certification must be made in accordance with the provisions of the consolidated plan

¹ The e-Snaps application and instructions have not yet been released by HUD. Detailed instruction on entering data into e-Snaps will be uploaded onto the HUD website at a later date: <https://www.hud.gov/hud-partners/community-coc>

² For instructions on completing the Certification of Consistency with Consolidated Plan, visit the Orange County CoC FY2025 CoC NOFO webpage, at <https://ceo.oc.gov/fy2025cocnofo>.

regulations at 24 CFR part 91, subpart F. Form HUD-2991 must be completed and dated between November 1, 2024, and January 14, 2026, or date of submission, whichever one is the earliest date.

Environmental Reviews (Attachment 2)³

The Environmental Review is required by HUD to ensure the project does not negatively impact the surrounding environment and that the property itself will not have adverse environmental or health effects on occupants. All CoC Program assistance is subject to the National Environmental Policy Act (NEPA) and applicable related Federal environmental authorities. Conditional selection of projects under the CoC Homeless Assistance competition is subject to the environmental review requirements of 24 CFR 582.230, and 882.804(c) as applicable.

The County will perform the Environmental Review and once approved, will sign the environmental review documentation. The environmental review documentation is addressed per project and will be valid for the next five (5) years from the day dated.

The agency, its project partners, and their contractors may not acquire, rehabilitate, convert, lease, repair, dispose of, demolish, or construct property for a project under this NOFO, or commit or expend HUD or local funds for such eligible activities under the FY2025 CoC Program NOFO, until the responsible entity (as defined by 24 CFR 58.2(a)(7)) has completed the environmental review procedures required by 24 CFR Part 58 and the environmental certification and Request for Release of Funds have been approved or HUD has performed an environmental review under 24 CFR Part 50 and the recipient has received HUD approval of the property. HUD will not release grant funds if the recipient or any other party commits grant funds before the recipient submits and HUD approves its Request for Release of Funds ().

25% Match Documentation (Attachment 3)

All eligible funding costs, except leasing, must be matched with no less than 25% cash or in-kind contribution. No match is required for leasing activities in the budget. The match requirements apply to project administration funds, along with the traditional expenses (operations, rental assistance, supportive services, and HMIS). Match must be met on an annual basis. HUD requires match letters to be submitted with the e-snaps application and should be included in the application submittal.

For in-kind match, the applicant agency may use the value of property, equipment, goods, or services contributed to the project, provided that, if the recipient or sub-recipient had to pay for such items with grant funds, the costs would have been eligible. If third party services are to be used as match, the third-party service provider that will deliver the services must enter into a memorandum of understanding (MOU) before the grant is executed documenting that the third party will provide such services and value towards the project. HUD requires match letters to be submitted with the e-snaps application and should be included in the application submittal.

Project Effectiveness (Exhibit 6)

Exhibit 6 captures information on the proposed project to evaluate the project's performance, including meeting the plans and goals established in the initial application or as amended, and project cost

³ For instructions on completing an Environmental Review, visit the Orange County CoC FY2025 CoC NOFO webpage, at <https://ceo.oc.gov/fy2025cocnofo>.

effectiveness. If a project has not yet operated a complete grant term, agencies should use Exhibit 6. Question 4 to provide an update related to project performance and/or detailed plan to ensure effective project implementation.

Recovery and Supportive Service Requirements (Exhibit 7)

Exhibit 7 assesses how the renewal project(s) approach supportive service provision, specifically for substance use treatment, and the agency's ability to comply with requirements listed within the FY2025 CoC Program NOFO.

Supportive Services Agreement (Attachment 4)

Attachment 4 must demonstrate that the renewal project will require program participants to take part in supportive services (e.g., case management, life skills, substance use treatment) in line with 24 CFR 578.75(h) by attaching a supportive services agreement (contract, occupancy agreement, lease or equivalent).

REVIEW, SCORING AND SELECTION PROCESS

Review Process

Agencies seeking to renew funding for CoC Projects must submit materials as described in this solicitation. Applications that are late, incomplete, or substantially deficient may not be advanced to the CoC NOFO Ad Hoc for scoring. 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.

The Orange County CoC will utilize the CoC NOFO Ad Hoc to review each project that passes the technical and threshold review. Any member of the CoC who is making an application or is affiliated with an organization/agency that is making an application will not participate in the review and ranking process or otherwise influence those that are ranking the applications.

The CoC NOFO Ad Hoc will receive the applications and scoring instructions in advance of the meeting. The CoC NOFO Ad Hoc will hold one meeting to review and average their scores and arrive at a decision about which projects to fund. Should there be a need for clarification, the CoC NOFO Ad Hoc may call in applicants for a Question-and-Answer (Q&A) Session. This session is at the discretion of the CoC NOFO Ad Hoc.

In keeping with HUD requirements, the CoC NOFO Ad Hoc in collaboration with the County as the Collaborative Applicant will also assign a score to all projects that will be funded. The CoC NOFO Ad Hoc will also recommend which project(s) should be submitted in response to the FY2025 CoC Program NOFO. The CoC NOFO Ad Hoc may also recommend that projects either increase or decrease their funding requests to maximize the use of available funds.

The final ranking of new and renewal projects as determined by the CoC NOFO Ad Hoc in collaboration with the County will be recommended to the CoC Board to determine their order on the Project Priority Listing submitted to HUD. Applicants will be notified of the results no later than January 13, 2026. Any projects not selected for funding may appeal the decision by following the CoC's appeal process. Placement on the Project Priority Listing does not guarantee funding, as HUD will review and assess all

new and renewal project applications for threshold compliance and project quality. Applicants conditionally selected for funding by HUD will be required to provide additional information in the form of a technical submission within 30 days of notification by HUD of the project's conditional approval.

Appeal Process

The CoC Board approves applications for ranking and funding recommendations to HUD. That ranking decision is communicated to all applicants by email. In all cases, the Appeals Panel has the final authority on appeals decisions.

A formal appeal must be submitted by 12:00 p.m. two (2) business days after the CoC Board decision. The appeal document must consist of a short, written statement (no longer than two pages) of the agency's appeal of the decision addressing the flaw in methodology or in the process used in the decision. The overall performance measurements or data are not a basis for an appeal. The statement can be in the form of a letter or a memo from an individual authorized to represent the agency (i.e., Executive Director). The appeal must be transmitted by email to Zulima Lundy (zulima.lundy@ceo.oc.gov), Felicia Boehringer (felicia.boehringer@ceo.oc.gov) and Jasmin Miranda (jasmin.miranda@ceo.oc.gov).

The Appeals Panel will be selected from the membership of CoC Board and/or its designees. The membership of the Appeals Panel will have no conflict of interest in serving. The Appeal Panel will conduct an in person, telephone, or virtual meeting with a representative(s) of the agency/collaborative who filed the appeal to discuss it, if needed. The Appeal Panel will inform appealing agencies of its decision. In all cases, the Appeals Panel has the final authority on appeals decisions.

Scoring Criteria

All Renewal Projects will be scored on a 100-point scale using the following criteria:

- Administrative Review
- Project Performance
- Project Effectiveness
- Coordinated Entry System Participation
- Unspent Funds
- Recovery and Supportive Service Participation

The FY2025 CoC Renewal Project Scoring and Rating Criteria, including the project performance measures, thresholds and point allocations, were approved at the CoC Board special meeting on December 5, 2025.

TIMELINE AND DUE DATES*

***NOTE: Dates subject to change.**

Please review the key dates and deadlines of the FY2025 CoC Renewal Project Application process:

Activity	Dates
HUD released FY2025 CoC Program NOFO	November 13, 2025
Release of the FY2025 Application for CoC Renewal Projects	December 2, 2025
Technical Assistance Office Hours via Microsoft Teams – Session 1	December 5, 2025, at 3:00 p.m.
Technical Assistance Office Hours via Microsoft Teams – Session 2	December 8, 2025, at 2:00 p.m.
HUD withdrew the FY2025 CoC Program NOFO with a statement on the intent to release a modified NOFO.	December 8, 2025
HUD released the modified FY2025 CoC Program NOFO for public review.	December 19, 2025
Deadline for Agencies to submit FY2025 CoC Renewal Project Applications to the County’s Office of Care Coordination	January 2, 2026, at 12:00 p.m. (PT)
Deadline for the County’s Office of Care Coordination to notify all agencies concerned regarding project acceptance, rejection, or reduction by the Orange County CoC	January 13, 2026
County’s Office of Care Coordination to post consolidated application for FY2025 CoC Program NOFO on webpage	January 26, 2026
HUD submission deadline for FY2025 CoC Program NOFO for “normal track”	January 28, 2026

SUBMISSION

It is the sole responsibility of the Agency to ensure that submission is prior to the due date and time. The FY2025 CoC Renewal Project Application including all Exhibits and Attachments must be submitted via Dropbox by 12:00 p.m. PT on Friday, January 2, 2026, to:

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

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 CoC reserves the right to:

1. Withdraw this solicitation at any time without prior notice and, furthermore, make no representation that any contract will occur and that funds will be awarded by HUD to any respondent to this solicitation.
2. Waive any irregularities in the FY2025 CoC Renewal Project Application process and reject any and all submissions not in the best interest of the CoC.
3. To request additional information and material. In addition, based on updates and information released by HUD, it may require and warrant the request of supplemental material.
4. Not renew projects 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 FY2025 CoC Renewal Project Applications.
6. Selection or rejection of a FY2025 CoC Renewal Project Application does not affect these rights.

FURTHER QUESTIONS AND ADDITIONAL RESOURCES

The County is available to answer questions on the FY 2025 CoC Renewal Project Application, application deadlines, process, training, or to provide copies of application materials specific to the Orange County CoC. For further questions or technical assistance, please email the Office of Care Coordination at CareCoordination@ocgov.com with the subject line “CoC Program NOFO” and Carbon Copy (Cc) Felicia Boehringer (felicia.boehringer@ceo.oc.gov), and Jasmin Miranda (jasmin.miranda@ceo.oc.gov).

Specific questions regarding your HUD grant amount, HUD guidelines etc. should be directed to your local HUD field office representative. **Please DO NOT contact the HUD field office regarding Orange County’s local application deadlines or process,** as the County’s Office of Care Coordination 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 agencies obtain, and review information related to the CoC Program, the CoC Interim Rule, and the HEARTH Act Regulations, along with any other related documents prior to completion of this FY2025 CoC Renewal Project Application. In addition, HUD will provide updates via their website at <https://www.hud.gov/hud-partners/community-coc>.