

Fiscal Year (FY) 2025 Continuum of Care (CoC) Program Competition Frequently Asked Questions (FAQs)

***Note: The FY2025 CoC Program Notice of Funding Opportunity (NOFO) has been withdrawn by the U.S. Department of Housing and Urban Development (HUD). Responses to questions reference information reflected in the rescinded FY2025 CoC Program NOFO.**

General Inquiries

- 1. With the deletion of the FY2025 CoC Program Notice of Funding Opportunity (NOFO) from the U.S. Department of Housing and Urban Development (HUD) CoC webpage, will any of the deadlines be extended?**
 - a. As a result of the withdrawal of the NOFO, the request for new and renewal applications has been paused until further notice. However, the FY2025 Agency Administrative Review for the Request for Proposals for CoC Bonus, Domestic Violence (DV) Bonus is still being requested for agencies wishing to submit a new project proposal, with an extended deadline of Friday, December 19, 2025, by 12:00 p.m. PT. The Office of Care Coordination will continue to provide communication via the CoC email distribution list and [FY2025 CoC NOFO webpage](#). If you are not yet subscribed to the CoC email distribution list, you may sign up by clicking [here](#).
- 2. Will HUD reissue the NOFO?**
 - a. HUD has indicated an intent to reissue a modified FY2025 CoC Program NOFO in advance of the deadline for obligation of available Fiscal Year 2025 funds, however, there is no indication of HUD's timeline.
- 3. What is included in the 30% cap on permanent housing in the FY2025 CoC Program NOFO*?**
 - a. The FY2025 CoC Program NOFO* limits the amount of funding that CoCs may request for permanent housing to the amount equal to 30% of a CoC's Annual Renewal Demand (ARD). This cap includes all permanent housing, including Permanent Supportive Housing, Rapid Re-Housing, and Joint Component TH-RRH.

Agency Administrative Review for CoC Funded-Agencies

- 4. When is the deadline for the Agency Administrative Review for CoC-Funded Agencies?**
 - a. Orange County CoC's FY2025 Agency Administrative Review for CoC-Funded Agencies must be submitted no later than Wednesday, December 10, 2025, at 5:00 p.m. (PT). Please note, this is only applicable to current CoC-Funded Agencies. Applicants eligible for CoC Program renewal funding received an invitation to submit their Agency's Administrative Review.

Applications for Renewal Funding

- 5. When is the deadline to submit CoC Renewal Project Applications?**
 - a. In response to HUD's withdrawal of the NOFO, the request for new and renewal project applications is being paused until further notice. The previous deadline of Monday, December 15, 2025, by 12:00 p.m. PT, has been removed.
- 6. How do we register a renewal application in e-snaps?**
 - a. The e-snaps application and instructions have not yet been released by HUD and are anticipated to be further delayed with the temporary removal of the NOFO. 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>
- 7. Are grants with Domestic Violence (DV) Renewal funding eligible to use the transition grant process?**
 - a. The Office of Care Coordination has reached out to HUD as the FY2025 CoC Program NOFO* had conflicting information as to whether a DV Renewal project is eligible to utilize the transition grant process. Given that we have not yet received a response/guidance from HUD about the discrepancy in the NOFO as it relates to transition grants, out of an abundance of caution and to not delay the application

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process, the Office of Care Coordination would feel most comfortable recommending a New Project at this stage for DV Renewal Projects. Additional guidance may be provided, should HUD provide further clarity.

- 8. For any questions in the CoC Renewal Project Application that are not applicable, should the response be N/A?**
 - a. There should not be any responses left blank on the application. If the question is not applicable to your agency/project type, the response can be "N/A".
- 9. For our CoC Renewal Project Application, are wet signatures required or can they be scanned and printed? Also, is DocuSign acceptable?**
 - a. Digital/DocuSign signatures as well as scanned/printed signatures are acceptable.

Request for Proposals for CoC Bonus, Domestic Violence Bonus and Reallocation Funding

- 10. When is the Request for Proposal (RFP) for the CoC Bonus, Domestic Violence (DV) Bonus and Reallocation Projects due?**
 - a. In response to HUD's withdrawal of the NOFO, the request for new and renewal project applications is being paused until further notice. The previous deadline of Monday, December 15, 2025, by 12:00 p.m. PT, has been removed, however an addendum has been issued for the FY2025 Agency Administrative Review for the RFP for the CoC Bonus, DV Bonus and Reallocation Projects. Please reference the [FY2025 CoC Program NOFO webpage](#) for more information.
- 11. What is included in the addendum for the FY2025 Agency Administrative Review for the RFP for the CoC Bonus, DV Bonus and Reallocation Projects?**
 - a. The FY2025 Agency Administrative Review for the RFP for CoC Bonus, DV Bonus and Reallocation Projects has been separated from the RFP application. Agencies interested in submitting a new project application under the RFP will still need to complete the required Agency Administrative Review documents. Under this addendum, the timeline has been modified to extend the submission deadline to Friday, December 19, 2025, at 12:00 p.m. PT. Please reference the [FY2025 CoC Program NOFO webpage](#) for the revised detailed description and Administrative Review materials.
- 12. How do we register an application in e-snaps?**
 - a. The e-snaps application and instructions have not yet been released by HUD and are anticipated to be further delayed with the temporary removal of the NOFO. Detailed instructions 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>
- 13. Can you provide additional guidance on what qualifies as a new service?**
 - a. A new service is a service that your organization is not currently funded to provide via the CoC Program funding.
- 14. Will it be permissible to continue providing ongoing support to existing clients with a new project?**
 - a. Unfortunately, a new project under the RFP must provide new services and cannot replace an existing project with existing clients.
- 15. What are the parameters around organizations applying for transition grants?**
 - a. The FY2025 CoC Program NOFO* allows for CoCs to create a transition grant, which is a new project funded through the reallocation process. The renewal project transitioning to a new component must be fully eliminated through reallocation. Any renewal grant funded through the CoC Program or Special NOFO can be reallocated to create a transition grant. A transition grant allows for a reallocated project to transition from one program component to another eligible component over a 1-year period. Transition grant applications awarded FY 2025 funds must fully transition to the new component by the end of the 1-year grant term and may only apply for renewal in the next CoC Program Competition under the component to which it transitioned. This allows more time to phase out the current project. The operating

start date of the transition grant will be the day after the end of the earliest expiring grant term. The new transition grant must meet all project quality and project threshold requirements for new projects and new project applicants. In order to qualify as a transition grant, the applicant must be the same organization as the current grant recipient.

16. If a Permanent Supportive Housing (PSH) or Rapid Re-Housing (RRH) project is reallocated to transitional housing (TH), will current program participants be eligible for the TH project so they can remain in place?

- a. Program participants residing in CoC-funded RRH and PSH are housed and are not homeless. Although participants maintain eligibility for a transfer into PSH, if needed, this does not apply to any other project types (42 USC 11383(f)). To be eligible for transitional housing, a household must meet Category 1, 2, or 4 of the homeless definition. Because program participants in PSH and RRH are housed, they would not be eligible for a new transitional housing project created through reallocation in FY2025 (42 USC 11302 and 24 CFR 578.37). There is some discussion that the loss of rental assistance resulting from reallocation would allow someone to meet Category 2, if they have not identified a subsequent residence and have limited resources or support. However, this is not consistent with the statute, regulation, or prior HUD guidance. For leaseholders, Category 2 (24 CFR 576.500) requires a "court order resulting from an eviction action that requires the individual or family to leave their residence within 14 days after the date of their application for homeless assistance; or the equivalent notice under applicable state law, a Notice to Quit, or a Notice to Terminate issued under state law." According to current regulations, the loss of rental assistance in and of itself would not be sufficient.

17. What project type can be created through Domestic Violence (DV) Bonus or Domestic Violence (DV) Reallocation processes?

- a. For the Orange County CoC local competition, new Projects created through DV Bonus or DV Reallocation processes can only be Transitional Housing (TH) project types. Please note, that this is subject to change should HUD reissue a modified NOFO with additional eligible project types.

18. What point threshold do new transitional housing (TH) projects need to meet?

- a. As indicated in the FY2025 CoC Program NOFO*, new TH projects would need to meet the threshold of at least 7 out of 10 points. New TH projects that do not receive at least 7 points will be rejected by HUD.

19. Can you explain the 40 hours of services for each client per week? Does each client need to participate in 40 hours of services each week, or does the agency need to offer 40 hours per week?

- a. The Office of Care Coordination is pending additional HUD guidance. Should this remain in the reissued NOFO, the Office of Care Coordination will look to the detailed instructions and navigational guides created by HUD, as these guides often offer insight into HUD's expectations.

20. Can you provide guidance on how to answer a question under the RFP, or share any examples?

- a. To ensure a fair and equitable process for all applicants/parties involved, we are unable to provide guidance or share examples on how to answer questions within the RFP. Applicants are encouraged to closely review the detailed descriptions for the Agency Administrative Review and RFP, as well as the FY2025 CoC Program NOFO*, for guidance.

21. Can our agency request more than 10% for administrative funds of the overall funding request?

- a. The [CoC Program Interim Rule](#) allows project applicants to request an amount up to 10% of other project grant line items for administrative costs.

22. What is "Match" for a CoC project application?

- a. Statutory provisions of the McKinney-Vento Homeless Assistance Act require recipients of CoC Program funds to "match" a portion of the CoC funds they receive for all budget categories except the leasing budget category.

Match in the CoC Program can be actual cash or in-kind resources contributed to the grant. The CoC Program requires a 25 percent match of the awarded grant amount minus funds for leasing. Another way

to state this is that the leasing budget line item in e-snaps is not included in the grant's match calculation. Cash or in-kind resources will satisfy the match requirement.

23. What is needed for the leveraged healthcare resource and housing resource commitments for the RFP for CoC Bonus, DV Bonus and Reallocation Funding?

- a. For the leveraging of Housing Resources and Leveraging of Healthcare Resources, there should be a formal letter of commitment or other formal documentation that specifies a clear commitment, the date of availability in the commitment that coincides with the period the grant would operate and must clearly provide the exact value of match assistance. Please reference the [Housing and Healthcare Resource Leveraging Commitment Instructions](#) for an example of a CoC Program Housing and Healthcare Resource Leveraging Commitment Letter Template.

24. For the leveraging of housing resources, can an agency use part of its overall match to pay specifically for 25% of housing resource commitments in order to earn full points?

- a. No, a project's match cannot be used as a leveraged resource. The match funds and leveraged funds must be separate amounts.

25. Are we required to provide both leveraged housing and healthcare services, or is providing leveraged healthcare services alone sufficient?

- a. Under the RFP, it is not a requirement to leverage both. Agencies seeking to apply are encouraged to follow the description of the basis for assigning points within the RFP scoring criteria listed to receive the maximum amount of points under Leveraging of Housing Resources and/or Leveraging of Healthcare Resources. The description listed in the criteria as a basis for assigning points for leveraging of housing or healthcare resources is reflective of the HUD's NOFO language, to give CoC's the most competitive application.

26. Are agencies without financial audits conducted by external Certified Public Accountants (CPAs) disqualified from applying?

- a. No. If smaller agencies do not have a structure in place for external financial audits, they may instead submit a letter as an attachment explaining their internal processes for ensuring funding is being used appropriately and adhering to all guidelines.

27. For any questions in the RFP for the CoC Bonus, Domestic Violence (DV) Bonus and Reallocation proposal that are not applicable, should the response be N/A?

- a. There should not be any responses left blank on the application. If the question is not applicable to your agency/project type, the response can be "N/A".

28. For the Request for Proposal (RFP) for the CoC Bonus, DV Bonus and Reallocation proposal, are wet signatures required or can they be scanned and printed? Also, is DocuSign acceptable?

- a. Digital/DocuSign signatures as well as scanned/printed signatures are acceptable.

[Certification of Consistency with the Consolidated Plan](#)

29. For the Certification of Consistency with the Consolidated Plan Form HUD-2991, is there a requirement regarding the dates as to when the form was completed?

- a. The certification must be made in accordance with the provisions of the consolidated plan regulations at 24 CFR part 91, subpart F, and the 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.

30. For the Certification of Consistency with the Consolidated Plan Form HUD-2991, our project has scattered-site transitional housing units, who do we request signature from?

- a. As noted in [Certification of Consistency in the Consolidated Plan Instructions](#), if your project involves scattered sites or is unknown at the time of submittal, please use your agency's main office address and receive signature from that corresponding jurisdiction.

31. What if our agency is pending Certification of Consistency with the Consolidated Plan signatures by the corresponding jurisdiction by the due date of December 15, 2025, at 12:00 p.m.?

- a. If the Certification of Consistency with the Consolidated Plan Form HUD-2991 is still pending signatures by the due date, please submit the application with an attached document explaining that the documentation has been submitted and is currently pending signature. You may also attach a screenshot of the email confirming that the Certification of Consistency with the Consolidated Plan Form HUD-2991 was submitted to your corresponding jurisdiction.

Environmental Reviews

32. Since this is a new project, are we required to conduct an environmental review? We currently do not know where the properties will be located yet.

- a. The environmental review process is required for all HUD-assisted projects to ensure that the proposed project does not negatively impact the surrounding environment and that the property site itself will not have an adverse environmental or health effect on end users.

For a proposed new project with project-based rental assistance (PBRA) or sponsor-based rental assistance (SBRA), please submit the application with an attached document explaining that current sites are unknown, and the information is being identified.

If your proposal is awarded through the FY2025 CoC Program Competition and conditionally selected by HUD, an environmental review will need to be completed once sites have been identified and prior to execution of the grant agreement.

An environmental review must be conducted for all projects for which CoC Program funds are being requested before those funds (including non-HUD funds) are committed to the project. This review will be conducted after the project has been conditionally selected by HUD and prior to execution of the grant agreement.

33. What if a proposed new project is limited to supportive services costs, do we need to submit an environmental review?

- a. For new projects limited to supportive services costs only that do not have leasing, rental assistance, construction costs, an environmental review at this time is not required. Please submit the application with an attached document explaining that the project does not have leasing, rental assistance, or construction costs.

If your proposal is awarded through the FY2025 CoC Program Competition and conditionally selected by HUD, an Exempt or Categorically Excluded Not Subject to Section 58.5 (CENST) Format document will be completed prior to execution of the grant agreement.

34. Can you provide some clarity on the documentation needed for the Environmental Review for the CoC Renewal Project Application/ RFP for CoC Bonus, DV Bonus and Reallocation Funding?

- a. First, determine what form to be used by reviewing [Exhibit B](#). Then, reference [Exhibit C](#) to review examples of either the Environmental Review for Continuum of Care Leasing or Rental Assistance Project that is Categorically Excluded Subject to Section 58.5 (CoC Limited Scope Review Form) or Environmental Review for Activity/Project that is Exempt or Categorically Excluded Not Subject to section 58.5 (CENST).

A Limited Scope Environmental Review Form, Environmental Review of Categorically Excluded Not Subject to Section 58.5, Environmental Clearance Letter, and/or signed Environmental Review documentation should be submitted.

35. Once the Environmental Review receives approval, what is the process to request an Environmental Clearance Letter from the County? We understand that the letter is valid for five years and can be submitted in lieu of the Environmental Review form for future applications?

- a. As of 2023, the County of Orange will no longer be providing the agency with an environmental clearance letter. The County of Orange will perform the Environmental Review and once approved, will sign the environmental review documentation which will need to be submitted with the Renewal Projects moving forward.

36. Is an environmental review required for each new program participant or new lease?

- a. Environmental reviews should be based on the building and the surrounding geography, and not on the actual unit. Therefore, if a unit is located within a building where an environmental review was already conducted, then the Responsible Entity (RE) will only need to verify that a review was conducted within the last five years or if/when the environmental conditions change.

37. What if our agency is pending environmental review documentation signatures by the County by the due date of December 15, 2025, at 12:00 p.m.?

- a. If an environmental review is still pending County signature by the due date, please submit the application with an attached document explaining that the environmental review documentation has been submitted and is currently pending County review.

38. For the environmental review CoC Limited Scope Review Form, it appears that the Environmental Protection Agency (EPA) information is no longer listed. Is the EPA map still required?

- a. Per the Executive Order 14151, Environmental Justice has been removed from National Environmental Policy Act (NEPA) environmental reviews, therefore, the Environmental Justice supporting documentation (EPA EJ Screen Mapper) is no longer required for the time being.

With submission of a CoC Limited Scope Review Form, please continue adding all the other maps as supporting documentation, including:

- Project Location Map (Map Source: Google Maps <https://www.google.com/maps>)
- Pictures of Project location exterior (Map Source: Google Maps <https://www.google.com/maps>)
- Project Location FEMA Map – Area of Minimal Flood Hazard (Map Source: FEMA Flood Map <https://msc.fema.gov/portal/home>)
- Attestation of Coastal Barrier Resources Act agency letter
- and Coastal Barrier Resources System Map (Map Source: Coastal Barrier Resources System Map - U.S Fish & Wildlife Service (<https://fwsprimary.wim.usgs.gov/CBRSMapper-v2/>))

Please reference the [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 \(PDF\)](#) instructions with an example.