

## FY25 NOFO COMPETITION WEBINAR – Q&A

### ABOUT

The Continuum of Care (CoC) Program (24 CFR part 578) is designed to promote a community-wide commitment to ending homelessness by funding efforts from nonprofits, governments, and tribal entities to quickly rehouse individuals and families—including those fleeing domestic violence—while minimizing trauma and promoting self-sufficiency. It aims to enhance access to mainstream programs and state/local resources.

The FY25 Notice of Funding Opportunity (NOFO) competition webinar walked through the key components of the FY25 CoC Program NOFO competition. It outlined major policy and structural updates, reviewed local competition requirements and timelines, and provided guidance for both renewal and new project applicants. The webinar also covered expectations for project scoring, ranking, reallocation, the 30% Permanent Housing (PH) cap, opportunities for technical assistance, and next steps for agencies preparing to apply.

### WEBINAR Q&A

If you have any questions regarding our local FY25 HUD CoC NOFO Competition, please contact [NOFO@cfthhouston.org](mailto:NOFO@cfthhouston.org).

QUESTION RECEIVED	RESPONSE
What percentage of total funding did/does CFTH grant to the PH category last year and the year before? I'm wondering how much less will be granted to that category this coming FY cycle.	<p>In recent years, our CoC has allocated approximately \$64 million of our CoC portfolio to Permanent Housing (PH), including PSH, RRH, and Joint TH–RRH projects.</p> <p>For FY 2025, our CoC's Annual Renewal Demand (ARD) is projected to be higher than in any prior competition, with an estimated total of about \$70 million in eligible renewal funding. This means our community is positioned to apply for more overall funding than ever before under the CoC Program.</p> <p>However, the FY 2025 CoC NOFO includes a new national requirement that no more than 30% of a CoC's ARD may be used for PH projects. Under our estimated ARD, this means our PH portfolio would be limited to approximately \$21 million this cycle.</p> <p>So while our total CoC funding opportunity has grown, the amount specifically eligible for PH is capped by HUD at 30% of ARD for all communities nationwide.</p> <p>As always, the exact local distribution will be determined through the CoC competition process, including Steering Committee review, performance data, local priorities, and alignment with HUD's requirements.</p>

Where are details of the NOFO published online which is specific to CFTH and not just the HUD website?	Details specific to our local competition can be found on the CFTH website > Funding > Active HUD CoC NOFO. Link: <a href="https://www.cfthhouston.org/funding-v2#ActiveHUDCoCNOFO">https://www.cfthhouston.org/funding-v2#ActiveHUDCoCNOFO</a>
How are the DV and YHDP services and funding pools distinguished from PHS or are they distinguished. Those two funding targets are discussed on the HUD site as a priority.	Under this NOFO, DV and YHDP projects are not automatically “safe” or protected. They must still compete in the overall CoC portfolio, including Tier 2, alongside other project types (TH, SSO, PH, etc)
Should you apply for Tier 1 or Tier 2 to apply for the Bonus projects?	All new projects (whether created through CoC Bonus, DV Bonus, or reallocation) will be placed in the CoC’s ranked list and subject to the Tier 1/Tier 2 structure. Applicants do not choose “Tier 1” or “Tier 2” when they apply; that is determined by the CoC through the local ranking process.
What types of projects are included in CoC Bonus this year?	CoCs may apply for the following types of new CoC projects through the CoC Bonus or CoC Reallocation processes: (1) SSO projects, (2) TH projects, (3) PH-PSH projects, (4) PH-RRH projects, (5) Dedicated HMIS project (that may only be carried out by the HMIS Lead), or (6) SSO-CE project to develop or operate a Coordinated Entry system.  Prior to completing a new project application created using CoC Bonus funds or through the reallocation process, project applicants should consult with the CoC to determine which of these options is available to be locally selected as part of the CoC.
Are the leverages our partnerships?	Yes, leverages may include commitments from private orgs, PHAs, state/local gov, healthcare systems, and faith-based groups. More details can be found online here: <a href="https://www.cfthhouston.org/funding-v2#ActiveHUDCoCNOFO">https://www.cfthhouston.org/funding-v2#ActiveHUDCoCNOFO</a>
Does the new service requirement apply to PSH projects as well?	HUD requirement: 40 hours/week is explicitly tied to new TH projects.  Local expectation: PSH and other housing projects should still demonstrate robust, outcomes-oriented services, even though they don’t have the 40-hour benchmark written into the NOFO.
DV bonus is \$5,000,000 of the \$52,000,000 noted on the CoC -Builds-NOFO?	No, the \$5M DV bonus is specific to this ( <a href="#">FR-6900-N-25</a> ) HUD CoC NOFO competition -

	which anticipates our CoC to receive just over \$70M. This NOFO is not the CoC builds NOFO.
Are previous DV protections still applicable i.e VAWA?	<p>Yes. Federal protections under the Violence Against Women Act (VAWA) remain in effect. This includes protections related to eviction, denial of housing, confidentiality, emergency transfers, and other rights covered by VAWA and HUD's implementing regulations (e.g., 24 CFR 5.2005–5.20011). <a href="https://www.rtfhhsd.org">rtfhhsd.org</a></p> <p>Projects serving survivors must comply with both:</p> <ul style="list-style-type: none"> <li>• VAWA requirements; and</li> <li>• Applicable CoC Program regulations at 24 CFR part 578, plus the specific terms of this NOFO.</li> </ul>
For new TH projects, what the time frame for the 40 hours of services per program participant requirement? 40/hours per week or per term of stay in TH?	<p>Per the FY 2025 CoC NOFO, new Transitional Housing projects must demonstrate they will provide “40 hours per week of customized services for each participant” (e.g., case management, employment training, substance use treatment).</p> <p>So, the standard is:</p> <ul style="list-style-type: none"> <li>• 40 hours of customized services per participant, per week.</li> <li>• This may be reduced proportionately for participants who are employed.</li> <li>• The 40-hour requirement does not apply to participants over age 62 or those with physical or developmental disabilities, as specified in the NOFO</li> </ul>
Are projects/applications that are renewal converting to a new type considered a 'new project'?	<p>Yes. If a current CoC-funded project changes component type (for example, from PSH to TH or RRH to SSO), that change is generally handled as a new project application through:</p> <ul style="list-style-type: none"> <li>• Reallocation or</li> <li>• A Transition Grant process (where applicable under the NOFO).</li> </ul> <p>So:</p> <ul style="list-style-type: none"> <li>• A project that is simply continuing in the same component is a renewal.</li> <li>• A project that changes component type will be treated as a new project for HUD application purposes and will need to meet all new-project thresholds and rating factors, even if it is using funding from an existing grant.</li> </ul> <p>Locally, these converted projects will also be treated as “new” for scoring and review.</p>

Do renewal PSH projects that end up in Tier 1 / within the 30% PSH cap need to meet the FY25 NOFO's new service requirements?	[Duplicate Q/C – Delete Row]
Is a new project considered as one that is just starting their program or new in terms of submitting nofo application	A “new project” is any program not currently funded by the HUD CoC program.
Can you provide any additional guidance or insight around the requirement for new TH projects to provide 40 hours of customized services per participant (except for participants over 62 or with a physical disability/impairment)?	<p>Key points from the NOFO for new TH projects: <a href="https://www.hud.gov/sites/dca/docs/heapa.org+1">heapa.org+1</a></p> <ul style="list-style-type: none"> <li>• You must demonstrate the project will provide 40 hours/week of customized services per participant (case management, employment, treatment, life skills, etc.).</li> <li>• Hours can be reduced proportionately for participants who are employed.</li> <li>• The requirement does not apply to participants 62+ or those with physical or developmental disabilities.</li> <li>• Services can be provided directly by the project and/or through formal partnerships, but must be documented and trackable.</li> <li>• HUD will score new TH projects on how well they: <ul style="list-style-type: none"> <li>○ Assist participants to exit homelessness within 24 months,</li> <li>○ Achieve permanent housing exits, and</li> <li>○ Increase employment income.</li> </ul> </li> </ul> <p>Locally, we will look for clear staffing plans, schedules, and partnership descriptions that show how you will realistically meet this requirement.</p>
Where is the updated deadline? and checklist and timeline, please. Thank you.	<p>The view project deadlines, view the current local competition timeline (subject to change): <a href="https://irp.cdn-website.com/8ccc955e/files/uploaded/FY+25+N+OFO+Timeline.pdf">https://irp.cdn-website.com/8ccc955e/files/uploaded/FY+25+N+OFO+Timeline.pdf</a></p> <p>To view additional competition documents, including the competition Checklist, please visit: <a href="https://www.cfthouston.org/funding-v2#ActiveHUDCoCNOFO">https://www.cfthouston.org/funding-v2#ActiveHUDCoCNOFO</a></p>
Are there any restrictions to the populations served for this NOFO? Going through the	The FY 2025 HUD CoC NOFO does not restrict funding to specific subpopulations (e.g., it does not say funds may <i>only</i> serve DV survivors or youth).

NOFO, it seemed like there was an emphasis for the DV and YHDP programs?	<p>However, the NOFO does highlight priority areas and scoring emphasis, including: <a href="https://heapa.org+1">heapa.org+1</a></p> <ul style="list-style-type: none"> <li>• Survivors of domestic violence, dating violence, sexual assault, and stalking (via DV Bonus),</li> <li>• Youth and young adults (via YHDP projects), and</li> <li>• Projects that promote safety, stability, employment, and public order.</li> </ul> <p>Locally, applicants can propose to serve any eligible population consistent with CoC regulations and local priorities, but should be aware that projects serving certain priority populations may be more competitive.</p>
When/where will we find out what agencies will be allowed to present "renewal" applications and remain as PH programs (part of the 30% piece of the ARD)?	We aim to inform agencies of their projected Teir placement by Friday, November 21, 2026.
Is the service requirement also applicable to Street Outreach/SSO projects?	<p>For SSO-Outreach and other SSO projects:</p> <ul style="list-style-type: none"> <li>• There is no numeric "40 hours" requirement.</li> <li>• However, HUD does expect robust, appropriate services (e.g., engagement, connection to treatment, shelter/TH/PH, benefits) consistent with 24 CFR 578.53(e)(13) and the new project quality thresholds. <a href="https://heapa.org">heapa.org</a></li> </ul> <p>Locally, SSO and Outreach projects will still need to show credible staffing and service models that align with HUD's emphasis on treatment, employment, and public safety.</p>
There are no TA slots available	We will open additional (virtual) TA slots for Wednesday, November 26 <sup>th</sup> , and may open additional slots over the holiday weekend if necessary. Visit <a href="https://calendly.com/rcavazos-2/fy-25-nofo-ta">https://calendly.com/rcavazos-2/fy-25-nofo-ta</a> to book an open session.
Did you say the deadline is December 1?	<p>At this time,</p> <p>Project Reallocation/Reduction Letters Due: 12/01/2025</p> <p>Renewal Projects Due: 12/04/2025 by 11:59 PM</p> <p>New Project Apps Due: 12/09/2025 by 11:59 PM</p>
The protected grants (CoC planning and CE's) will take away from the 30% tier 1 housing projects?	The system CE, HMIS, Outreach, and planning grants will be kept in Tier 1 as those components are essential for system stability; however, these projects do not take away from the 30% PH project protections. The 30% regulations run concurrently.

<p>I see there are a lot changes around client support and income stability, and performance outcomes. Are we still following housing first? as this has always been a barrier with trying to help clients with behavioral health, getting job or just attending life skills courses. Do we have any new rules surrounding that</p>	<p>HUD no longer prioritizes Housing First in this year's scoring. Our CoC will continue following all <i>required</i> federal low-barrier and fair housing regulations, but we must also align with the NOFO's stronger expectations around behavioral health, employment, income, and accountable service participation. We are moving toward a Housing + Services + Accountability</p>
<p>Can we get clarity on the reg around DEI but adhering to protected classes? That was confusing to me.</p>	<p>Our CoC and CFTH follow federal civil rights laws first, and then local/state requirements, including:</p> <ul style="list-style-type: none"> <li>• Fair Housing Act</li> <li>• Title VI, Section 504, ADA</li> <li>• VAWA</li> <li>• CoC Program regulations at 24 CFR part 578</li> </ul> <p>The FY 2025 CoC NOFO also includes specific language prohibiting racial preferences and certain prohibited practices, including:</p> <ul style="list-style-type: none"> <li>• No discriminatory screening or preferences, and</li> <li>• No activities that conflict with current federal guidance on sex, race, or other protected classes.</li> </ul>
<p>Are TA sessions virtual or in person?</p>	<p>TA sessions are conducted virtually. Visit <a href="https://calendly.com/rcavazos-2/fy-25-nofo-ta">https://calendly.com/rcavazos-2/fy-25-nofo-ta</a> to book an open session.</p>
<p>In the 1980s, HUD promoted the Transitional Housing model. In the 1990s and 2000s, HUD shifted away from Transitional Housing. With the new 30 percent PSH cap, how is Permanent Supportive Housing going to be impacted, and what kind of impact is this going to have on our community?</p>	<p>Under this NOFO, no more than 30% of ARD can fund Permanent Housing projects (PSH, RRH, Joint TH/PH-RRH).</p> <p>For our community, that likely means:</p> <ul style="list-style-type: none"> <li>• Some existing PSH and RRH projects cannot be renewed at current levels,</li> <li>• Certain projects may need to transition to TH or SSO models, or be reduced/reallocated, and</li> <li>• The CoC will need to deliberately maintain a core set of PSH units for people with the highest needs, while expanding TH and SSO capacity.</li> </ul> <p>We anticipate this will:</p> <ul style="list-style-type: none"> <li>• Put pressure on exits from PSH, prioritization, and throughput,</li> <li>• Increase the need for robust services and employment supports to move people on when appropriate</li> </ul>

<p>What is the deadline for the application?</p>	<p>Per the FY 2025 CoC NOFO, the HUD deadline for the CoC Consolidated Application (including FY 2025 Project Listing) is:</p> <ul style="list-style-type: none"> <li>January 14, 2026 at 8:00 PM Eastern Time (7:00 PM Central).</li> </ul> <p>Our local internal deadlines (for renewals, reallocations, and new projects) are earlier and are posted on the CFTH website and in the FY 25 NOFO Timeline PDF.</p>
<p>Does case management documentation apply towards the 40 hours/week?</p>	<p>Yes. For new TH projects, case management is specifically cited in the NOFO as part of the 40 hours/week of “customized services” per participant.</p> <p>This can include:</p> <ul style="list-style-type: none"> <li>One-on-one case management sessions</li> <li>Documented service planning</li> <li>Coordination with employers, treatment providers, and benefits offices</li> <li>Group classes (life skills, financial literacy, etc.)</li> </ul> <p>All services counted toward the 40 hours/week must be documented, individualized, and tied to housing stability, health, or income/employment outcomes.</p>
<p>Will the family PSH programs have to move into transitional housing also?</p>	<p>Family PSH programs are not automatically required to transition to TH. However:</p> <ul style="list-style-type: none"> <li>If a family PSH project does not fit within the 30% PH cap and is not prioritized to remain PH, it may need to:             <ul style="list-style-type: none"> <li>Transition to another component (e.g., TH),</li> <li>Be reduced, or</li> <li>Be reallocated.</li> </ul> </li> </ul> <p>There are no special protections for “family” PSH in this NOFO. Sub-population-specific PSH projects (families, youth, veterans, etc.) must compete like other PH projects within the 30% limit</p>
<p>DV survivors are not required to participate in case management to received services. How does that work with the current focus? Were are the DV specific regs located so I can do some research?</p>	<p>The NOFO emphasizes robust services and participation requirements for some project types (especially TH).</p> <p>Projects serving DV survivors must balance:</p> <ol style="list-style-type: none"> <li>1. VAWA &amp; DV requirements – including safety, confidentiality, and non-discrimination. See:             <ul style="list-style-type: none"> <li>VAWA regulations at 24 CFR 5.2005–5.20011, and</li> <li>CoC Program regulations at 24 CFR 578, especially definitions of</li> </ul> </li> </ol>



	<p>“victim service provider” and related provisions.</p> <p>2. NOFO expectations – high service intensity, employment/ income focus, and public safety components.</p> <p>In practice:</p> <ul style="list-style-type: none"> <li>• DV projects can strongly encourage and structure services without coercion that would endanger survivors or violate VAWA protections.</li> <li>• Participation expectations should be trauma-informed and clearly documented in policies, safety planning, and program design</li> </ul>
Will supportive service remain primarily the same with this new TH? Such as childcare, etc...	Yes, supportive services will remain the same for TH projects. For further details, please read the FY25 NOFO ( <a href="#">FR-6900-N-25</a> ).
Does the 30% cap apply just for PH housing renewals rental assistance or does it include VAWA and admin costs for DV agencies as well?	<p>The 30% cap applies to the total funding for Permanent Housing projects (PH-PSH, PH-RRH, Joint TH/PH-RRH) – not just the rental assistance line item.</p> <p>This means:</p> <ul style="list-style-type: none"> <li>• For any PH project, all CoC-funded budget lines (rental assistance, supportive services, operations, and admin – including any VAWA-related costs within that project) count toward the PH total that must be kept at or below 30% of ARD.</li> <li>• DV projects that are TH or SSO are not counted against the PH 30% cap.</li> <li>• DV PH projects (e.g., DV PH-RRH) <i>do</i> count toward the PH 30% cap, including their associated admin and eligible VAWA-related costs within the CoC grant.</li> </ul>
could I at least get the requirements	To view specific requirements, please read the FY25 NOFO ( <a href="#">FR-6900-N-25</a> ).
Can you clarify about the harm reduction requirement? From what I understand, you will only be penalized for drug injection sites, drug paraphernalia distribution, etc. but not necessarily offering peer support services, or other substance abuse supports, correct?	<p>Yes, your interpretation is broadly correct. The NOFO explicitly requires project applicants to certify that they will not:</p> <ul style="list-style-type: none"> <li>• Operate drug injection sites or “safe consumption sites”,</li> <li>• Knowingly distribute drug paraphernalia on or off property under their control,</li> <li>• Permit the use or distribution of illicit drugs on property under their control, or</li> </ul>



	<ul style="list-style-type: none"> <li>• Conduct these activities under the pretext of “harm reduction.”</li> </ul> <p>However, the NOFO does not prohibit:</p> <ul style="list-style-type: none"> <li>• Evidence-based substance use treatment,</li> <li>• Peer support services, recovery groups, or</li> <li>• Other clinical or supportive services aimed at helping people reduce or stop substance use.</li> </ul> <p>Those services are still allowed and, in many cases, encouraged, as long as programs do not cross the explicit lines above.</p>
Will 202 HUD Residential funding be cut?	The Section 202 Supportive Housing for the Elderly program is separate from the CoC Program and is funded through a different HUD appropriation.

## RESOURCES

- FY25 HUD CoC NOFO (FR-6900-N-25) Document: [Click here](#) to view.
- Local Competition Information: [Click here](#) to view.
- HUD CoC Program Information: [Click here](#) to view.
- eSnaps Login Portal: [Click here](#) to access.