FY 2026 NOFO

CONTINUUM OF CARE COMPETITION

FY26 COC NOFO FREQUENTLY ASKED QUESTIONS

This FAQ is intended as general local guidance for the FY26 CoC Competition. It does not replace the FY26 HUD NOFO, federal regulations, executed grant agreements, or final HUD guidance. Responses may be updated as HUD issues additional guidance. Applicants are responsible for reviewing all HUD requirements and local competition materials. CFTH will also review FAQ responses, as needed, for alignment with HUD requirements, local competition standards, procurement considerations, and legal/compliance review.

1. **What is the FY26 CoC NOFO?**

The FY26 CoC NOFO is HUD's annual funding competition for Continuum of Care Program funds. It includes renewal projects, transition grants, reallocation projects, new project opportunities, and the CoC's consolidated application.

2. **What is the local competition?**

The local competition is the process the CoC uses to review, score, rank, and prioritize projects before they are submitted to HUD. HUD requires the CoC to submit a Priority Listing, and only projects included on that list may move forward to HUD for funding consideration.

3. **Does submitting a local application guarantee funding?**

No. Submission of a local application does not guarantee that a project will be selected, ranked, or funded by HUD. Projects must meet local and federal requirements and be included on the CoC Priority Listing.

4. **What types of new projects is the local CoC prioritizing?**

For FY26, the local CoC is prioritizing new projects that align with HUD's FY26 focus and local system needs, including Transitional Housing and Supportive Services Only projects. Applicants should review the local materials carefully before submitting a new project application.

5. **Are transition grants considered new projects?**

Yes. Transition grants are considered new project applications for purposes of the CoC Competition, even when they transition from an existing renewal grant. They are not treated as standard renewal applications because the project component or structure is changing.

6. **Can an RRH project transition to TH?**

Yes, if allowed under the NOFO and local competition process. For FY26, RRH projects being asked to transition should apply as Transitional Housing through the local process and follow the transition grant instructions.

7. **Can a project change component type through the GIW?**

No. The GIW process is not used to change project component type. Component changes are handled through the CoC Competition application process, such as through a transition grant. The GIW should only reflect the current eligible renewal inventory and correct Annual Renewal Amount.

8. What is the GIW?

The Grant Inventory Worksheet, or GIW, is HUD's list of projects eligible for renewal in the FY26 CoC Competition. It is used to confirm renewal project information and establish the CoC's Annual Renewal Demand.

9. What should agencies review on the GIW?

Agencies should review applicant name, project name, grant number, project component, budget line items, Annual Renewal Amount, rental assistance unit configuration if applicable, and whether any executed grant amendment is reflected correctly.

10. Should agencies submit GIW Change Forms directly to HUD?

No. Agencies should send any needed GIW corrections to CFTH. CFTH, as the Collaborative Applicant, will compile and submit any needed GIW Change Forms to HUD.

11. Should projects expected to be reallocated be removed from the GIW?

No. Projects expected to be reallocated in the FY26 Competition should remain on the GIW unless the Annual Renewal Amount is incorrect. Reallocation decisions are handled through the competition process, not through GIW removal.

12. What if an agency does not respond to the GIW review request?

If an agency does not respond by the local deadline, CFTH will assume the agency reviewed the GIW and that the project information is correct as listed.

13. What is Applicant Eligibility Documentation?

Applicant eligibility documentation confirms that the organization is eligible and ready to apply for and administer CoC Program funds. This may include nonprofit status, SAM.gov/UEI information, financial documentation, organizational capacity information, and other materials requested in the local application.

14. Is an audit required?

If the agency has a completed audit, it should be submitted with the application materials. If an audit is not applicable or not available, the applicant should note that in the checklist and provide any requested explanation or alternative financial documentation.

15. Can institutions apply directly for CoC funding?

Only if they meet one of HUD's eligible applicant categories. "Institution" is not a standalone eligible applicant type. An institution may be eligible if it is a nonprofit organization, state or local government, instrumentality of state or local government, Indian Tribe/TDHE, or public housing agency, and is selected through the local CoC competition.

16. Can for-profit entities apply directly?

No. For-profit entities are not eligible direct applicants or subrecipients under the CoC Program.

17. Can agencies budget for HMIS software or licenses?

No, agencies should not budget separately for HMIS software or license costs. CFTH provides HMIS licenses for participating agencies. DV providers are an exception here.

18. Can agencies budget for staff time related to HMIS?

Yes. If a project will have dedicated staff time for HMIS data entry, data quality, or required project-level reporting, the agency may include the appropriate portion of salary/fringe in the HMIS budget line item. The amount should be reasonable and tied to actual HMIS responsibilities.

19. Are there HMIS training costs?

There is not a separate HMIS training cost to the agency for standard required HMIS onboarding/training provided through CFTH. Each HMIS user must complete required training and the user agreement process before access is granted.

20. Are property inspections required?

Yes, if the project includes housing units, the applicant/recipient is responsible for ensuring the units meet applicable HUD housing quality/property standards before assistance is provided and throughout the grant term, as required.

21. Will CFTH provide property inspections?

No. CFTH will not provide property inspections for the system. Agencies should plan to complete inspections through qualified staff or an independent inspector, depending on the project structure and internal policies. Inspection documentation should be maintained in the project file.

22. What is Direct Service Participation Language?

Direct service participation language describes how the project will communicate supportive service participation expectations to participants. For FY26, housing projects must show service participation expectations while remaining aligned with Housing First, VAWA, fair housing, confidentiality, trauma-informed practice, and safety-related needs.

23. Does the FY26 NOFO require supportive service participation requirements?

Yes. The FY26 NOFO places emphasis on housing projects having participation requirements for supportive services, consistent with 24 CFR 578.75(h). Participation language should be clear, but it should not require disability-related services unless otherwise allowed.

24. Does this mean services can be coercive?

No. Service participation requirements should not be used in a way that is unsafe, discriminatory, or inconsistent with Housing First, VAWA, fair housing, confidentiality, or trauma-informed practice. Services should be appropriate to the household's needs and project model.

25. How should victim service providers handle service participation language?

Victim service providers should include clear participation expectations while preserving survivor choice, safety planning, confidentiality, and trauma-informed practice. A hybrid approach may be appropriate if it shows an expectation of engagement in housing stability planning/case management while ensuring that specific services remain individualized and survivor-centered.

26. Do VAWA protections apply only to victim service provider projects?

No. VAWA protections apply broadly to CoC housing projects because the CoC Program is a covered housing program. A project does not have to be a victim service provider project for VAWA to apply.

27. How do VAWA protections apply to projects not specifically serving survivors?

If an applicant or participant is a survivor of domestic violence, dating violence, sexual assault, stalking, or human trafficking, the project must apply VAWA protections. This includes protections related to denial of assistance, termination, confidentiality, emergency transfers, and safety-related needs.

28. Does VAWA supersede HUD regulations?

This should not be framed as VAWA superseding HUD regulations. Both requirements must be read together. Projects must comply with the FY26 NOFO and CoC Program requirements while also complying with VAWA, confidentiality, fair housing, and survivor safety requirements.

29. Can a project deny or terminate assistance because someone is a survivor?

No. Housing assistance should not be denied, terminated, or otherwise penalized because someone is a survivor, is experiencing violence, or has safety-related needs.

30. Who can administer CoC rental assistance?

CoC rental assistance must be administered by a State, unit of general local government, or public housing agency. This does not mean any specific local government or PHA is required to administer the assistance, but the project must identify an eligible and feasible administrator.

31. Can victim service providers directly administer CoC rental assistance?

Under the general CoC rental assistance regulation, rental assistance administration is limited to a State, unit of general local government, or public housing agency. Victim service providers may need to partner with an eligible administrator unless HUD provides additional guidance or flexibility.

32. Are HUD and national partners aware of the rental assistance administration issue?

HUD and national partners are aware of the broader concern, particularly where it affects victim service providers and survivor housing models. Additional guidance may be forthcoming, but applicants should follow current HUD requirements unless and until HUD provides different written guidance.

33. What is the difference between match and leverage?

Match and leverage are not the same.

Match is still required unless an exception applies. Under the CoC Program, recipients must generally provide a 25% match for grant funds, except leasing funds.

Leverage is different from match. Based on the FY26 NOFO, a separate leverage requirement is not required in the same way it has been in some prior competitions. Applicants should still describe meaningful partnerships or resources where requested, but local applicants are not required to submit separate leverage documentation unless specifically requested in the local application materials.

34. How much project administrative funding can be requested?

CoC projects may request project administrative costs up to the allowable cap under HUD rules. Administrative costs must be eligible, reasonable, and tied to grant administration.

35. If a project has subrecipients, how is administrative funding split?

When a project has one or more subrecipients, the recipient must share at least 50 percent of project administrative funds with subrecipients. If there are multiple subrecipients, the subrecipient share is split collectively among them based on role, responsibility, budget size, administrative burden, or another reasonable documented method.

36. Does each subrecipient get 50 percent of admin?

No. The 50 percent sharing requirement applies to subrecipients collectively, not to each subrecipient individually.

37. Can utility allowance be included in a leasing budget?

For leasing budgets, utilities may only be included in the leasing line item if electricity, gas, and water are included in the rent charged by the landlord. In that case, the utility cost is part of the rent/leasing cost.

If utilities are not included in the rent and are billed separately, those costs should not be placed in the leasing line item. Depending on the project structure, separately billed utilities may need to be budgeted under another eligible line item, such as operating costs, if allowed and applicable.

Applicants should make sure the budget clearly reflects whether utilities are included in the rent or billed separately.

38. Can renter’s insurance be included in a leasing budget?

Renter’s insurance should not be included in the leasing budget line item unless HUD provides additional written guidance allowing it.

The leasing budget line is generally for eligible leasing costs, such as rent and allowable security deposits. If an applicant has an insurance-related cost, they should identify what type of insurance it is and where it is required. Property insurance may be an eligible operating cost in some project structures, but participant renter’s insurance is not treated the same as rent or leasing.

Applicants should not include renter’s insurance in the leasing budget without confirming allowability.

39. What is the estimated FY26 project start date?

The FY26 NOFO lists January 1, 2027 as the estimated project/performance period start date. Applicants may use this date for planning purposes at this stage. However, this should be treated as an estimated NOFO date only. The actual grant start date may differ and will be determined by HUD through the conditional award, grant agreement, or renewal/transition grant term. Renewal projects generally follow their existing grant term, and transition grants are typically tied to the end date of the grant being transitioned.

40. Can applicants submit questions after TA?

Yes. Applicants may submit questions through the local NOFO process. Responses may be added to the FAQ so all applicants have access to the same information.

41. Will all answers provided during TA be binding?

TA responses are intended to help applicants understand the local process and HUD requirements. Final determinations will be based on the NOFO, HUD regulations, local competition materials, legal/procurement review where applicable, and any additional HUD guidance.

42. Where should applicants send questions?

Applicants should send FY26 CoC Competition questions to the designated local NOFO email address.

43. What happens if HUD issues additional guidance?

If HUD issues additional guidance, CFTH will update local materials or FAQs as needed and share the information with applicants.