

GRCoC FY26 HUD CoC Program Competition Policies & Procedures

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Overview and Purpose

Each year, the United States Department of Housing and Urban Development (HUD) releases funding through the Continuum of Care (CoC) Program to assist people at imminent risk of or experiencing homelessness. To apply for CoC funding, communities must establish a Continuum of Care entity consisting of the stakeholders involved in the local effort to prevent and end homelessness. The Greater Richmond Continuum of Care (GRCoC) has been established for this purpose. The geographic area served by the Greater Richmond Continuum of Care includes the City of Richmond, and the counties of Charles City, Chesterfield, Goochland, Hanover, Henrico, New Kent, and Powhatan.

To launch the competition, HUD issues an annual CoC Notice of Funding Opportunity (NOFO) which outlines the funding available and general requirements of the process. Each Continuum of Care is notified of the maximum amount of funds for which it may apply. That amount is a combination of the CoC's Annual Renewal Demand (ARD), which is the total amount of funding needed to renew all the CoC's existing grants, and any bonus funds HUD makes available. Continuums of Care must apply to fund both renewing and new projects for no more than the maximum amount allowed by HUD. The GRCoC is responsible for developing and implementing a local process that aligns with the NOFO, soliciting project applications, rating and ranking proposals, and submitting the community's Consolidated Application, which contains the project proposals that were successful in the local competition.

These Local Competition Policies and Procedures highlight how the local competition works, including the strategic direction and priorities reflected in the local competition, basic CoC program requirements, the application process for new and renewing projects, and how applications are scored and selected for the Consolidated Application. The policies also provide an overview of the structure and functions of the Continuum of Care for organizations and stakeholders who may be new to the process.

These policies are updated annually to reflect any changes in local CoC policies or structure as well as new information or guidance reflected in that year's NOFO announcement. Should this document and the GRCoC Coordinated Grant Review Process approved by the CoC Board in 2018, conflict, the policies and procedures described in the document will override that one for the purposes of the 2026 HUD Continuum of Care Program Notice of Funding Opportunity.

Please refer to the Glossary for definitions of key terms.

Continuum of Care Structure and Roles

Continuum of Care

A Continuum of Care is required by statute to prepare and oversee an application for federal funds targeted to homelessness which includes establishing priorities for funding projects within the geographic area; determining which applications can be received for consideration; and selecting the applications being submitted for funding. These requirements are outlined under the McKinney-Vento Homeless Assistance Act as amended by the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act of 2009, section 42 U.S.C. § 11382. The primary purpose of a CoC in this context is to bring together various stakeholders, including service providers, local government agencies, and community organizations, to collaboratively assess the needs of the homeless population and strategize on the most effective interventions. This collaborative approach ensures that funding decisions are based on comprehensive, data driven assessments and are aligned with the broader goals of reducing and ultimately ending homelessness in the community.

To receive HUD CoC funding, every Continuum of Care must establish a governance structure that is codified in a Governance Charter or By-laws. The GRCoC has adopted Bylaws to describe its governance. This section summarizes the sections of the Bylaws most relevant to the local NOFO competition.

Continuum of Care Board

The Continuum of Care must establish a board to act on behalf of the Continuum using the process established as a requirement by § 578.7(a)(3) and must comply with the conflict-of-interest requirements at § 578.95(b). The board shall endeavor to include the following:

- Homeless or formerly homeless individual(s) including youth and young adults
- Representatives from homeless service providers, including a representative of an agency serving survivors of sexual and domestic violence
- Representative from an agency funded with Emergency Solutions Grant funding
- Representative from the VA Medical Center or other organization serving homeless veterans
- Representatives of the philanthropic sector
- Representatives of local government agencies or regional entities in the Continuum of Care
- Representatives from law enforcement, including elected officials
- Representatives from the business community including the regional Chamber of Commerce

The Continuum of Care Board of Directors, per GRCoC Bylaws, is responsible for:

Responsibilities of the Board include, but are not limited to:

1. Establishes a framework to meet the needs of the homeless population and subpopulations within the geographic area.
2. Designates a CES Coordinator to manage all Coordinated Entry System processes and ensure alignment with GRCoC decisions.
3. Operates a coordinated entry system providing comprehensive assessments of housing and service needs for individuals and families.

4. Adopts and monitors fair and transparent standards for screening, eligibility, and administering assistance across the geographic area.
5. Selects a Collaborative Applicant and establishes an annual MOU to formalize the legal agreement and working relationship on behalf of the GRCoC.
6. Conducts an annual performance review of the Collaborative Applicant and determines whether to renew the existing Collaborative Applicant or to conduct a solicitation process to identify and select a Collaborative Applicant.
7. Ensures all CoC-based funding applications are based on recommendations from the GRCoC and the Collaborative Applicant, and that required federal and state submissions are on time and of good quality.
8. Secures and aligns local, state, and federal funds, ensuring GRCoC and other public and private funds are used efficiently and effectively to solve homelessness in the region.
9. Oversees applications for coordinated funding, including setting project priorities, vetting applications, coordinating Continuum of Care and Emergency Solutions Grant funding, and selecting submissions based on GRCoC recommendations.
10. Monitors the implementation of programs in regional or local plans to end homelessness, ensuring resources are invested in high-performing, community-responsive programs.
11. Monitors program and system performance against HUD-established measures, ensuring compliance with HUD, HEARTH Act, and other relevant regulations.
12. Designates an HMIS lead to ensure compliance with HUD, the HEARTH Act, and other relevant regulations, and to maximize data availability for planning, performance, and service coordination.
13. Addresses potential or perceived conflicts of interest in an effective, open, and timely manner.

In relation to the HUD CoC NOFO the CoC Board is also responsible for:

1. Adopting the Local Competition Policies and Procedures for each coordinated funding competition;
2. Approving the membership of the Ranking Committee;
3. Setting strategic funding priorities;
4. Approving the priority listing of projects to be included in the Consolidated Application; and
5. Approving the submission of the Consolidated Application

CoC Committees

- **Quality Improvement Leadership Workgroup (QIL)**- comprised of 2 members from every organization receiving CoC, ESG, and VHSP funds. QIL is responsible for providing feedback on project performance measures and the strategies for improving system performance.
- **Governance Committee**—is comprised of 4-5 members of the CoC Board. It recruits unconflicted candidates for the Ranking and Review Committee and nominates them to the CoC Board to approve the roster.
- **Ranking & Review Committee (Ranking Committee)**- comprised of unconflicted members, recruited by the governance committee and appointed by the board. Membership of the Ranking Committee is targeted to local ESG recipients, local philanthropic funders, and people with lived experience of homelessness. The Ranking Committee is responsible for the ranking and review of all coordinated funding competition applications (Including HUD and VHSP), reviewing appeals, endorsing letters of support, and supporting informed community funding decisions. Members may not be current staff of an organization applying for funds.

- **Youth Action Board**- comprised of persons aged 18-24 with lived experience of homelessness, responsible for providing endorsement for replacement YHDP projects.
- **Lived Expertise Council**- comprised of persons with lived experience of homelessness

Conflict of Interest Policy

Members of the GRCoC, the GRCoC Board, and its Committees shall comply with federal, state and local laws and related regulations. The business of the GRCoC should be conducted in a manner to avoid all conflicts of interest.

1. No GRCoC board member may participate in or influence discussions or resulting decisions concerning the award of a grant or other financial benefits to the organization that the member represents.
2. No covered person, meaning a person who is an employee, agent, consultant, officer, or elected or appointed official of the recipient or its subrecipients and who exercises or has exercised any functions or responsibilities with respect to activities assisted under this part, or who is in a position to participate in a decision-making process or gain inside information with regard to activities assisted under this part, may obtain a financial interest or benefit from an assisted activity, have a financial interest in any contract, subcontract, or agreement with respect to an assisted activity, or have a financial interest in the proceeds derived from an assisted activity, either for him or herself or for those with whom he or she has immediate family or business ties, during his or her tenure or during the one-year period following his or her tenure.
3. On issues in which a GRCoC Member has a conflict of interest as described above, neither the Member nor his/her delegate may vote. Members applying for funding may not participate in discussions regarding funding allocation decisions during the open funding process. The Chair of the GRCoC Board will be responsible for monitoring the disclosure of members' conflicts of interest.
4. In the event that a matter, which raises a potential conflict of interest, comes before the GRCoC, the GRCoC Board, or its Committees or workgroups for consideration, recommendation, and decision, the Member shall disclose the conflict of interest as soon as he or she becomes aware of it, and the disclosure shall be recorded in the minutes of the meeting.
5. Members found violating the conflict-of-interest policy or federal regulations will be referred to the GRCoC Governance Committee. The Governance Committee shall investigate all allegations of failure to comply with this conflict-of-interest policy. If a Greater Richmond Continuum of Care member is found to have violated the letter or intention of this conflict-of-interest policy, the Governance Committee will be responsible for recommending an appropriate response to this breach of policy to the GRCoC board. The Governance Committee may recommend any action including but not limited to a statement of reprimand recorded in the board minutes or removal from the board or other action. The GRCoC board will consider the recommendations of the Governance Committee and vote on corrective or punitive actions to be administered.

Collaborative Applicant

Homeward is designated by the CoC Board as the Collaborative Applicant for the GRCoC. This responsibility is governed by the Collaborative Applicant MOU, which is annually reviewed by the GRCoC Board for renewal consideration. It submits the Consolidated Application in response to the HUD CoC NOFO and manages the local competition for soliciting and evaluating the projects

applications that will be included in it. The collaborative applicant is also responsible for staffing GRCoC Committees and Workgroups, ensuring the GRCoC is able to meet all funder threshold requirements, and ensuring on-time submission for all public, coordinated funds requiring a collaborative applicant.

New in the HUD FY26 NOFO

HUD Priorities

Below are new HUD priorities found within pages 12-13 in the FY2025 CoC Program NOFO. To maximize competitive funding opportunity, the GRCoC will work to meet funder requirements in the FY25 local competition.

- 1. Ending unsheltered homelessness**
- 2. Prioritizing treatment and recovery**
- 3. Promoting economic self-sufficiency**
- 4. Improving outcomes**
- 5. Minimizing trauma**
- 6. Increasing competition**

Other Changes

- Sixty percent of a CoC's funding is protected in Tier 1, down from 90 percent in past years. The amount of funding available for the GRCoC's FY26 HUD Competition is estimated* at:
 - Tier 1 is estimated at \$5,937,696; and
 - Available CoC Bonus Funding is estimated at: \$1,402,045,
 - Available DV Bonus Funding is estimated at: \$1,869,394,
 - Making total available Tier 2 funding estimated at: \$7,229,903
- All projects except for CoC Planning/UFA must compete, including YHDP renewals and DV Bonus. These projects must be ranked and scored with no special protections, increasing competition across the entire portfolio.
- Renewals are deprioritized: HUD has established a \$1.3 billion set-aside for *new* projects in Tier 2.
- Tier 2 scoring now favors new TH and SSO projects, with housing projects requiring participation in supportive services.
- Significant changes in policy preferences, HUD no longer prioritizes a housing first or harm reduction approach.
- Changes and additions to the YHDP special activities, including allowing YHDP TH projects to administer rental assistance (P. 47, FY26 NOFO)
- Updated HUD Applicant and Recipient Assurances and Certifications (HUD-424B); affirmative certifications regarding DEI mandates, "safe consumption sites" included in New Applicant review criteria (P. 60, FY26 NOFO).
- New Certification of Need and Compliance with Housing Quality; New Certification for Opportunity Zone Preference Points (P. 44, FY26 NOFO; e-snaps application).
- New and expanded Post-Award Requirements and administrative expectations, (P. 106-108, FY26 NOFO).

*Funding availability is estimated until HUD publishes FY26 Final Annual Renewal Demand Report

Local Competition Priorities and Requirements

CoC Strategic Priorities

The GRCoC plans to advance these priorities through our coordinated work.

- Prioritize renewing and adding projects that increase system wide performance measures. Reviewing low-performing renewal projects for reallocation to expand high-performing resources.
- Prioritizing resources that promote housing stability and address complex health needs. Prioritizing resources that address sub-population service needs, including but not limited to: older adults, people with disabilities, families with minor children, youth aged 18-24, and households fleeing domestic violence.
- Support the addition of new partners, including faith-based providers.
- Ensure funding for federally required system components (Homeless Management Information System, Coordinated Entry)
- Review low-performing renewal projects for re-allocation to high-performing renewal projects and new projects

(References: [GRCoC Ranking and Review Process](#) and [2026-27 Coordinated Funding Priorities & GRCoC Investment Strategy](#))

CoC Funding Amounts and Tiers

HUD notifies CoCs how much funding they can request each year. That amount is a combination of the CoC's Annual Renewal Demand (ARD), which is the total amount of funding needed to renew all the CoC's existing grants, and any bonus funds HUD makes available. The GRCoC must submit a Consolidated Application with project applications that total no more than its ARD and its bonus opportunities. In recent years HUD has invited CoCs to apply for regular bonus projects, and Domestic Violence bonus projects.

All projects included in the Consolidated Application must be prioritized in rank order on a two-tiered list. The Tiering levels for FY26 are significantly different from the FY24-25 competition.

- **Tier 1**—is set to 60% of the CoC's Annual Renewal Demand. Projects that rank in Tier 1 will receive federal funding pending funder merit & risk review, and unless extraordinary circumstances affect the amount of federal funding expected to be available.
- **Tier 2**—is the balance of the Annual Renewal Demand and any bonus funding HUD makes available. Projects placed in Tier 2 must compete nationally for their award and are not guaranteed to be selected.

Because projects in Tier 2 are not assured funding, CoCs must be strategic about which projects are ranked in Tier 2.

Local Application Types

There are two primary types of project applications for the NOFO Competition. There are also some "exception" applications that are treated differently, as described below.

- **Renewal Projects**, which are already funded and are applying for ongoing funding. Renewal projects are evaluated and scored based upon performance data generated from Annual Performance Reports (APRs) and e-LOCCs as well as responses to narrative questions. APR data is pulled from the Homeless Management Information System (HMIS), except for organizations serving victims of domestic violence that do not

participate in HMIS. Renewal Project types that are eligible for participation in the GRCoC local competition are: Permanent Supportive Housing (PSH), HMIS, SSO-CE.

- **New Projects**, which are newly proposed projects that: are **transition grants, YHDP replacement, or projects that do not yet receive CoC funding in VA-500**. New Project applications can be submitted by applicants that are currently receiving CoC funding for other projects, or by applicants that are not currently receiving any CoC funding.

Renewal Project applicants that are transitioning from one program component to another are considered New **Transition Grants**. These projects must be operated by the same recipient, and if awarded, will have a 1-year period to fully transition to the new program component. See page 21 of FY26 NOFO for additional details and restrictions. Transition grants will be treated as new projects for the purposes of Scoring and Ranking. Transition grants are subject to the New Project Scoring tool and application process.

YHDP projects may only create new projects through re-allocated funds, transitioning project components, consolidation, or expansion, using the **YHDP replacement process**. Only the program components of TH, SSO, SSO-CE, SSO, and HMIS are eligible to be created through the YHDP replacement process. See page 15 of the FY26 NOFO for additional details and restrictions. YHDP replacement projects are subject to the New Project Scoring tool and application process.

* See “scoring and ranking policies” for performance scoring policies for new project, transition grant, and replacement project applicants.

Renewal Project applicants seeking re-allocated, CoC bonus, or DV bonus funding to expand their renewal projects to serve more households or provide more services must submit a New Project Application in addition to their Renewal Project Application. See page 16 of the FY26 NOFO for additional details and restrictions.

New Projects can only be funded through Reallocated Renewal Funds, CoC Bonus Funds, or DV Bonus Funds. New Projects are scored based upon information submitted during the application process, including basic program information, descriptive narratives and data from comparable projects when available.

- The GRCoC is seeking new Transitional Housing (TH) and Supportive Services Only (SSO) projects (Including SSO-standalone and SSO-Street Outreach) whether funded by transition grant, reallocation, CoC bonus or DV bonus funds. SSO-Coordinated Entry will only be considered for DV bonus funds. The GRCoC explicitly encourages organizations who do not currently receive HUD funding to apply under this competition.

In the FY26 HUD CoC Competition, all renewal and new projects must be competitively reviewed and ranked. Planning is not eligible for renewal and is noncompetitive and will therefore be included separately in the CoC’s priority listing.

Threshold Requirements

New and renewal project applications must meet threshold requirements to be reviewed by the Ranking Committee and included in the Consolidated Application submitted to HUD. These requirements were revised by GRCoC Board of Directors February 8, 2018 - updated by Homeward staff based on bylaw changes May 19, 2026.

The Designated Collaborative Applicant will examine all coordinated grant applicants/projects to determine if they meet the threshold requirements listed below on a pass/fail standard. If the Designated Collaborative Applicant determines that the requirements have not been met, the application will be rejected. Rejected applications are not included in the Consolidated Application and will not receive federal funding. The Collaborative Applicant will host a “CoC Application webinar” and respond to Frequently Asked Questions (FAQs) during the competition period to ensure prospective applicants are fully informed of the Threshold Requirements.

1. **Be an active member of the GRCoC as defined in the bylaws, or commit to becoming an active member in the GRCoC.** Membership in the CoC will be composed of entities and individuals concerned with the development and coordination of homeless assistance programs. Entities members are human service agencies, departments of local government, businesses, faith organizations, businesses, educational organizations, and other public agencies. An Entity member will be considered a member in good standing, or Entity Active Member, by attending 75% of the general meetings held during the prior calendar year or by attending 75% of the meetings of a specific CoC committee held during the prior calendar year.
2. **Services must be delivered within the GRCoC service area** which includes: Charles City County, Chesterfield County, Goochland County, Hanover County, Henrico County, New Kent County, Powhatan County, the City of Richmond, and the Town of Ashland.
3. **The applicant must be incorporated as a 501 (c) 3 not for profit organization, a unit of local government, or a faith-based organization,** per HUD’s designation of eligible applicants in the Notice of Funding Opportunity. Eligible entities should be able to demonstrate standard accounting and grants management policies and procedures, as well as demonstrating fiscal health through recent audit history.
4. **New applicants agree to comply with all GRCoC Homeless Management Information System (HMIS) requirements,** as laid out in the approved GRCoC HMIS Policies and Procedures and HMIS Policies Committee: Compliance and Monitoring Policy. Renewal applicants must have demonstrated compliance with all GRCoC HMIS requirements, as laid out in the approved GRCoC HMIS Policies and Procedures and HMIS Policies Committee: Compliance and Monitoring Policy.
5. **New applicants agree to comply with all the requirements laid out in the approved GRCoC Coordinated Entry Policies and Procedures.** Renewal applicants must have demonstrated compliance with all the requirements laid out in the approved GRCoC Coordinated Entry Policies and Procedures by having a signed and active CES MOU.
6. **The applicant must meet the eligibility requirements of the funding agency.** It is the applicant’s responsibility to read and comply with these requirements. For CoC Program those requirements include providing match funding and providing certifications and assurances for post-award organizational operations, as delineated in the NOFO. See citations provided in “New in the HUD FY26 NOFO” section of this document.
7. **Acknowledgement of GRCoC Funded Provider Standards:**
 - Participation in Coordinated CoC Activities, such as PIT and CoC Workgroup/Committee Participation
 - Furthering Community Identified Funding Priorities
 - Supporting the inclusion of people with lived experience of homelessness in decision-making roles within the continuum
 - Following the GRCoC-adopted program standards for relevant program types

(References: [GRCoC Applicant Threshold Requirements](#))

Scoring and Ranking policies

- **Scoring of Late or Incomplete Applications:** Projects submitted after the deadline or missing mandatory attachments will not be considered/will receive reduced scores.
- **Project Scores:** The GRCoC Ranking Committee will score Renewal and New Project applications based on the scoring rubric approved by the Ranking Committee and provided with the local application.
 1. Project performance scoring: As noted above, local application scores will be generated from objective factors captured in the Annual Performance Reports or a comparable database, if applicable, and narrative responses. Project application scores will be the basis for rankings on the Priority Listing, consistent with GRCoC Project ranking policy.
 2. Renewal Project Performance Scoring: The Collaborative Applicant will pull the project APR report from HMIS for the calendar year 2025 after 14 days of the competition opening. Collaborative Applicant will score project performance data using scoring criteria for the renewal project component for Ranking Committee review.
 3. New Transition Grant Scoring: The Collaborative Applicant will pull the project APR report from HMIS for the calendar year 2025 after 14 days of the competition opening. Collaborative Applicant will score project performance data using scoring criteria for the project component the applicant is transitioning from for Ranking Committee review.
 4. YHDP Replacement Grant Performance Scoring: The Collaborative Applicant will pull the project APR report for the calendar year 2025 after 14 days of the competition opening. For replacement projects that are transitioning project components, transition grant scoring process will apply. For projects seeking to consolidate multiple projects or expand an existing project, the project(s) matching the 2025 recipient and FY26 applicant will be scored for Ranking Committee review.
 5. DV Projects (New and Renewal) with existing CoC or ESG funding: Projects serving DV populations are prohibited from using HMIS, but are required to use an HMIS comparable database. New and Renewing DV projects should submit the project APR comparable report to the Collaborative Applicant within 14 days of the competition opening. Submitted reports will be scored by the collaborative applicant for Ranking Committee review.
 6. New Applicants who do not currently receive HUD funding: Projects submitting for HUD CoC funding are expected to be able to demonstrate the capacity for meeting HUD CoC Funding Data collection and management requirements. This may be demonstrated by the applicant by submitting project performance data for the calendar year 2025 that is consistent with the elements evaluated through this competition for the applicable component type along with a narrative description of current data collection and management procedures with their performance report for Ranking Committee review within 14 days of the competition opening. The Collaborative Applicant will score submitted performance data and submit data, scores, and narrative for Ranking Committee review.
- **Project Ranking**--The Priority Listing will be generated as follows: All new and renewing projects will be ranked by their application scores. Consistent with HUD's review selection policy, renewing projects will be prioritized for Tier 1 funding availability. On Deliberation Day, the Ranking Committee has the authority to re-order the list regardless of score under the following circumstances, only:

1. To preserve capacity for special populations or other programs meets a unique need in the GRCoC system of care that is currently not served by another project.
2. If no qualified Renewal Projects are available, the Ranking Committee may also elect to rank the highest scoring New or Transition Project into Tier 1.
3. Projects within Tier 2 may be re-ordered to maximize overall funding for the CoC, taking into consideration the placement in Tier 2 and the amount of funding requested.

Reallocation Policy

Amended for clarification; June 2026

Federal and state coordinated grant processes permit a Continuum of Care (CoC) to move or reallocate funds between projects to better achieve federal, state and CoC goals for addressing homelessness. In particular, the US Department of Housing and Urban Development encourages the reallocation of funds from renewal projects to provide funding for new projects. Reallocation also presents an opportunity for CoC's to move funding from projects that are underspending, not cost effective, or under-performing. The GRCoC is particularly interested in re-allocating projects from organizations that have a recent history of under-spending CoC funds.

The Ranking Committee reserves the right to recommend a partial or total reduction in a project's renewal funding request.

Reallocation Process for the Voluntary Return of Funds:

GRCoC grantees may self-nominate to voluntarily return any amount of eligible renewal funds through the CoC Competition process, with a minimum reallocation amount of 10% of the base budget and a maximum of the total projects renewal amount. A project may request to reallocate eligible renewal funds by indicating in the letter of intent by the deadline set. A grantee seeking to return funds through the voluntary process must do so in accordance with funder requirements.

Reference: [GRCoC Reallocation Process](#)

Overview of Competition Process and Requirements

The GRCoC Local HUD Continuum of Care Program Funding Competition is initiated when the funder (HUD) released their FY CoC Program NOFO. Homeward, as the collaborative applicant, notifies the community and opens local applications. Community process & timeline, application documents and scoring forms are posted on the CoC website (endhomelessnessrva.org) and GRCoC Members are notified via email listserv. Within 2 weeks of local applications becoming available, Homeward will host a "CoC Application Overview & How to apply" webinar. Attendance at these webinars is not required, though highly encouraged for interested applicants. Additionally, Homeward will host a series of open office hours to respond to applicant questions.

All applicants who intend to submit new or renewing project applications are encouraged to submit a letter of intent to Homeward within 14 days of the "CoC Application Overview & How to

Apply” Webinar to ensure eligibility before beginning the project application. In the webinar slides, a link will be provided with instructions on how to complete the letter of intent.

For the FY26 GRCoC Competition, local applications will submit project application responses on the WizeHive online platform. Application links and details will be reviewed at the “How to Apply” webinar and posted on the CoC website. Copies of webinar slides with relevant links will be posted on the CoC website.

For renewing projects, all performance scores will be pulled from HMIS APR reports for the calendar year preceding the competition. For FY2026, calendar year 2025 data will be used. Collaborative Applicant staff will complete the performance portion of the scorecards and provide these directly to the Ranking Committee for review. For new projects that are applying for transition grant or YHDP replacement projects, their performance score will be calculated using the scoring criteria from the project component they are transitioning from or replacing. New applicants who use a comparable database will have the opportunity to submit data reports directly to the collaborative applicant. New applicants who do not currently receive CoC or ESG funding and do not currently use HMIS or a comparable database will need to submit a performance report from the most recent calendar year that includes comparable data elements tracked by the applicant along with a narrative describing the organization’s data collection and management policies and procedures to the collaborative applicant. The competition facilitator will score comparable data elements and submit applicant performance data and narrative for ranking committee consideration. DV providers using a comparable database should submit project APRs relevant to the new or renewal application for Collaborative Applicant review and scoring. Performance data should be submitted within 14 days of the local competition opening.

For new and renewing projects, applicants will have the opportunity to provide narrative responses via online project application. The Ranking Committee will score narrative responses for criteria included in the project component scorecards.

The Ranking Committee will independently review and score individual applications prior to meeting as a panel. After independently reviewing and scoring applications, the committee meets to finalize project application scoring and project ranking order on the priority listing.

Projects are notified of their score and ranking via direct email, the finalized community ranking is available publicly on the CoC’s website. These policies and processes are reviewed annually by Collaborative Applicant staff, considered for review and enhancement by ranking every competitive application cycle, with board action as needed.

Reference: [GRCoC Ranking and Review Process](#)

Appeals Policy and Process

Approved by the GRCoC Board 9/10/2014, Adjusted by Homeward Staff July, 2024 for clarity and continuity

The CoC Ranking Committee (“RC”) has established the following appeal process for coordinated funding applications. Once the RC has reviewed and scored the applicants’ proposals, the results will be emailed to applicants’ points of contact listed in the application

and/or letter of intent. The results will also be publicized in accordance with any funder requirements. Applicants should note that scores reflect the individual program proposal as well as the relative strength of each program in comparison with other proposals for the same eligible activity and the need to ensure a strong collaborative network of homeless assistance programs across the entire geographic area of the Continuum of Care. Applicants who have specific concerns regarding the review and scoring of their application may file an appeal.

Appeals will only be considered for concerns specific to the review process and scoring of the application. Appeals related to the amount of funding recommended or project location on the priority listing will not be considered. All notices of appeal must be based on:

- Information submitted by the application due date.
- The applicant's in-person presentation to the Ranking Committee (RC).

The following cannot be appealed:

- Amount of funding recommended.
- Location of funding recommendation on the priority listing.
- New or additional information not submitted by the deadline.
- Omissions to the application by the applicant.

Appeals Committee Structure

An Appeals Committee will be formed, composed of:

- Three voting members of the GRCoC Board.
- One non-voting member of the RC.

The voting members of the Appeals Committee must not have reviewed the proposal seeking appeal or have a conflict of interest with any of the agencies applying for the applicable funding.

Eligible Appeals

Applicants may appeal if they can:

- Prove their score is not reflective of the application information provided; **or**
- Describe bias or unfairness in the process, which warrants the appeal.

Appeal Process

1. The results of the RC review and scoring will be emailed to applicants' points of contact (listed in the application and/or letter of intent) and posted pursuant to the funder's requirements. Specific instructions regarding the point of contact and the deadline for appeals will be included in this information.
2. All notices of appeal must be submitted electronically to the point of contact by the publicized deadline. Receipt of the notice of appeal will be confirmed within 24 hours.
3. The notice of appeal must include a written statement specifying in detail all grounds asserted for the appeal.
 - The appeal must be submitted by an individual authorized to represent the agency.
 - It must include the specific sections of the application on which the appeal is based.
 - The appealing agency must specify facts and evidence sufficient for the Appeals Committee to determine the validity of the appeal (e.g., attaching the specific areas of the application and clearly explaining why the information provided was adequate to gain additional points).
4. The Appeals Committee will review and evaluate all notices of appeal to determine whether the appeal meets the GRCoC eligibility requirements.

5. All eligible appeals will be read, reviewed, and evaluated by the Appeals Committee within 48 hours of the appeal deadline.
6. The Appeals Committee will provide a determination of the appeal to the appealing applicant and the Ranking Committee.
7. The recommendation of the Appeals Committee will be final.
8. A written summary of the Appeals Committee's decisions will be provided to the appealing agency.

(Reference: GRCoC Appeals Process)

Additional materials

Glossary

- **Annual Performance Report (APR):** Required electronic report submitted to HUD annually by recipients of CoC homeless assistance grants. Data collection is aligned with HMIS Data Standards. It assesses grantee performance and is used in local application scoring. Projects serving domestic violence survivors may use a comparable database instead of HMIS.
- **Annual Renewal Demand (ARD):** The total sum of the annual renewal amounts of all projects within the CoC that are eligible for renewal in that fiscal year's competition, prior to FMR-based adjustments.
- **Collaborative Applicant:** The entity responsible for preparing and submitting a CoC's consolidated application in response to HUD's annual NOFO. Homeward is the appointed Collaborative Applicant for the GRCoC (VA-500).
- **Consolidated Application:** Consists of three required parts: the CoC Application, the CoC Priority Listing, and all the CoC's project applications (approved/ranked or rejected).
- **Continuum of Care (CoC):** Established by the 2009 HEARTH Act, the CoC Program aims to:
 - Promote communitywide commitment to ending homelessness.
 - Provide funding to quickly rehouse homeless individuals and families.
 - Promote access to and utilization of mainstream programs.
 - Optimize self-sufficiency among individuals and families experiencing homelessness.
- **Coordinated or Centralized Entry System (CES):** (as defined by HUD) A centralized or coordinated process for program participant intake, assessment, and referrals. It must cover the geographic area, be easily accessed and advertised, and include a comprehensive, standardized assessment tool.
- **eLOCCS:** The electronic Line of Credit Control System, HUD's primary grant disbursement system, which handles disbursements for CoC Program and other HUD programs via the Internet.
- **Eligible Applicant:** (as defined by HUD) A private nonprofit organization, State, local government, or instrumentality of State and local government.
- **e-SNAPS:** The electronic grants management system used by HUD's Office of Special Needs Assistance Programs (SNAPS) for CoC Program funding applications and grant award processes.
- **Grant Inventory Worksheet (GIW):** A report used to record all grants within a CoC's area eligible for renewal funding. It calculates the Annual Renewal Amount (ARA) for each project and the CoC's Estimated Annual Renewal Demand (ARD).
- **Homeless Management Information System (HMIS):** The local IT system used to collect client-level data on the provision of housing and services to homeless individuals and families. The GRCoC uses Wellsky as its HMIS software. Data from HMIS is used to score renewal applications. Homeward is the HMIS Lead Agency.
- **Housing Quality Standards (HQS):** The HUD minimum quality standards for tenant-based programs, applying to the building, premises, and unit.
- **HUD Continuum of Care Notice of Funding Opportunity (NOFO):** The annual announcement from HUD that initiates the national competition for CoC funding.
- **Match:** Cash and/or in-kind resources contributed by the CoC and ESG grant recipient as a condition of funding. All grant funds must be matched with an amount no less than

- 25% of the awarded grant (excluding the leasing budget line item).
- **Priority Listing:** The ranked list of all Project Applications (approved/ranked or rejected) that the Collaborative Applicant must submit to HUD, with each project assigned a unique rank number.
 - **New Project Application:** An application for a newly proposed project applying for CoC NOFO funding for the first time in a given year.
 - **Project Sponsor:** The organization responsible for carrying out the proposed project activities. The sponsor can be the applicant or a sub-recipient.
 - **Reallocation:** A process used by CoCs to shift funds, in whole or part, from existing eligible renewal projects to create one or more new projects without affecting the CoC's ARD. It is often used for unspent funds or to convert projects (e.g., transitional housing to Rapid Rehousing (RRH)).
 - **Recipient:** An applicant of CoC Program funds that executes a grant agreement with HUD. Must be a private nonprofit organization, State, local government, etc., to be eligible.
 - **Renewal Application:** An application submitted by a project with an existing HUD CoC contract (generally one year) that is expiring and seeking to have its funding renewed through the local process.
 - **Tier 1/Tier 2:** HUD-required ranking for all projects in the Consolidated Application:
 - **Tier 1:** A percentage of the CoC's ARD (defined by HUD in the NOFO). Projects ranked here are confidentially expected to be funded, provided they meet HUD's threshold requirements.
 - **Tier 2:** The balance of Tier 1 and the CoC's ARD, plus any bonus funding (including DV Bonus). Projects in Tier 2 are not assured funding and compete nationally for an award.

Appendix A: Requirements, Guidelines

- CoC Program Interim Rule
- CES P&P GRCoC Coordinated Entry System Policies and Procedures
- HMIS policies: HMIS Compliance

Appendix B: Sample Documents and Resources

Sample Service Participation Agreement

Greater Richmond Continuum of Care (GRCoC)

Standard Service Participation Agreement for HUD Funded Projects (Non-SUD Treatment)

**Please customize this standard template for your project's specific service offerings to ensure applicability to your specific project type.*

As required by the FY2026 CoC NOFO, this Service Participation Agreement outlines the supportive service expectations for participants in the project. Supportive Services include case management, employment training, substance use treatment, etc. These services are designed to help participants obtain and maintain housing stability, increase income, improve health and well-being, and/or successfully exit to permanent housing.

Project Name:	Effective Date:
Participant Name:	Unit/Room:

Participant Rights

Participants have the right to:

- Access services in a trauma-informed and housing focused manner.
- Decline disability-related services.
- Request reasonable accommodations.
- File grievances without retaliation.

Required Service Participation

Participants agree to the following required participation:

- Meet with a case manager at least one time per month.
- Participate in a Housing Stability Plan.
- Engage in housing retention activities.
- Attend required appointments for housing stability.
- Cooperate with documentation and re-certification.

Optional Services (Not Required)

Additional voluntary, customized services are available for each participant.

Termination & Appeals

Terminations follow 24 CFR 578.91 with due process.

Signatures

Role	Name	Signature	Date
Participant			
Staff			

Notes: This agreement complies with:

- 24 CFR 578.75(h) stating, “[Programs] may require the program participants to take part in supportive services that are not disability-related services provided through the project as a condition of continued participation in the program. Examples of disability-related services include, but are not limited to, mental health services, outpatient health services, and provision of medication, which are provided to a person with a disability to address a condition caused by the disability. Notwithstanding this provision, if the purpose of the project is to provide substance abuse treatment services, recipients and subrecipients may require program participants to take part in such services as a condition of continued participation in the program.”
- 24 CFR 578.91 defining due process as: “In terminating assistance to a program participant, the recipient or subrecipient must provide a formal process that recognizes the rights of individuals receiving assistance under the due process of law. This process, at a minimum, must consist of: (1) Providing the program participant with a written copy of the program rules and the termination process before the participant begins to receive assistance; (2) Written notice to the program participant containing a clear statement of the reasons for termination; (3) A review of the decision, in which the program participant is given the opportunity to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the termination decision; and (4) Prompt written notice of the final decision to the program participant.

Greater Richmond Continuum of Care (GRCoC)
Standard Service Participation Agreement for HUD Funded SUD Treatment Projects

**Please customize this standard template for your project's specific service offerings to ensure applicability to your specific project type.*

As required by the FY2026 CoC NOFO, this Service Participation Agreement outlines the supportive service expectations for participants in the project. Supportive Services include case management, employment training, substance use treatment, etc. These services are designed to help participants obtain and maintain housing stability, increase income, improve health and well-being, and/or successfully exit to permanent housing. This agreement applies to projects whose purpose is to provide Substance Use Disorder (SUD) treatment.

Project Name:	Effective Date:
Participant Name:	Unit/Room:

Participant Rights

Participants have the right to:

- Person-centered, trauma-informed services.
- Reasonable accommodations.
- Non-discrimination.
- Ability to file grievances without retaliation.

Required Service Participation

Participants agree to the following required participation:

- Work to attend individual and group SUD service available on-site and off-site.
- Complete clinical assessments and treatment plan updates.
- Work to engage in case management and recovery support.
- Follow health and safety rules.
- Work to comply with referrals for appropriate levels of care.

Optional Services (Not Required)

Additional voluntary, customized services are available for each participant.

Noncompliance & Corrective Action

Staff will review barriers, adjust treatment plans, provide accommodations, and create corrective action plans before considering discharge.

Termination & Appeals

Terminations follow 24 CFR 578.91 with due process.

Signatures

Role	Name	Signature	Date
Participant			
Staff			

Notes: This agreement complies with:

- 24 CFR 578.75(h) stating, “[Programs] may require the program participants to take part in supportive services that are not disability-related services provided through the project as a condition of continued participation in the program. Examples of disability-related services include, but are not limited to, mental health services, outpatient health services, and provision of medication, which are provided to a person with a disability to address a condition caused by the disability. Notwithstanding this provision, if the purpose of the project is to provide substance abuse treatment services, recipients and subrecipients may require program participants to take part in such services as a condition of continued participation in the program.”
- 24 CFR 578.91 defining due process as: “In terminating assistance to a program participant, the recipient or subrecipient must provide a formal process that recognizes the rights of individuals receiving assistance under the due process of law. This process, at a minimum, must consist of: (1) Providing the program participant with a written copy of the program rules and the termination process before the participant begins to receive assistance; (2) Written notice to the program participant containing a clear statement of the reasons for termination; (3) A review of the decision, in which the program participant is given the opportunity to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the termination decision; and (4) Prompt written notice of the final decision to the program participant.

Appendix C: Certifications & Assurances

HUD CoC APPLICANT CERTIFICATIONS AND ASSURANCES

By submitting an application for funding under the GRCoC FY 2026 Continuum of Care (CoC) Competition and/or Youth Homelessness Demonstration Program (YHDP), the Applicant certifies, represents, and assures that:

1. **Organizational Eligibility**

The Applicant is an eligible entity under the applicable HUD Notice of Funding Opportunity (NOFO), is legally authorized to conduct the proposed activities, and possesses the organizational capacity, financial management systems, and staffing necessary to successfully administer the proposed project.

2. **Federal Registration and Standing**

The Applicant maintains an active Unique Entity Identifier (UEI), an active SAM.gov registration, and all other registrations required by HUD for application submission and award administration. The Applicant agrees to maintain these registrations throughout the term of any award.

3. **Compliance with Applicable Laws and Regulations**

The Applicant will comply with all applicable federal statutes, regulations, NOFO requirements, grant agreement provisions, and HUD guidance, including but not limited to the McKinney-Vento Homeless Assistance Act, 24 CFR Part 578, 2 CFR Part 200, and all applicable civil rights and fair housing laws.

4. **Civil Rights Certification**

The Applicant certifies that it does not have any outstanding, unresolved judgments for violations of federal, state, or local civil rights laws that would render it ineligible for HUD funding. If any such matters exist, they have been fully resolved or are subject to a compliance agreement acceptable to HUD.

5. **Nondiscrimination and Equal Access**

The Applicant will provide services, benefits, and access to housing without discrimination and will comply with all applicable fair housing, accessibility, and equal opportunity requirements.

6. **HUD-Specific Affirmative Certification**

The Applicant affirmatively certifies that they will not:

- 1) The project applicant will not engage in illegal racial discrimination. This is consistent with the requirements of 2 CFR 200.300(a).
- 2) The project applicant will not operate drug injection sites or "safe consumption sites" in violation of 21 U.S.C. 856(a)(1), knowingly permit the use or distribution of illicit drugs on property under their control in violation of 21 U.S.C. 856(a)(2), or knowingly distribute drug paraphernalia in violation of 21 U.S.C. 863. This is consistent with the objectives outlined in Section III.B above and is consistent with the requirements of 2 CFR 200.300(a).
This certification is not a requirement that program participants must be sober in order to receive assistance, participate in treatment in order to receive assistance, or be evicted or exited from assistance for a first-time violation of a drug-related program policy or lease requirement.

7. **Accuracy of Information**

The Applicant certifies that all information, statements, certifications, attachments, and supporting documentation submitted in connection with this application are true, complete, and accurate to the best of its knowledge. The Applicant understands that false, fictitious, or fraudulent statements may result in denial of funding, termination of an

award, repayment obligations, civil penalties, and/or criminal prosecution.

8. **Match and Financial Commitments**

The Applicant certifies that it will provide all required matching funds or in-kind contributions and maintain documentation sufficient to demonstrate compliance with HUD match requirements.

9. **Financial Management and Recordkeeping**

The Applicant maintains financial management, internal control, procurement, and recordkeeping systems that comply with federal requirements and agrees to make all records available for monitoring, audit, or review by HUD or other authorized entities.

10. **Programmatic Compliance**

The Applicant will operate the project in accordance with the approved application, eligible activities, performance requirements, participant eligibility requirements, and all applicable HUD program standards.

11. **Monitoring, Reporting, and Performance**

The Applicant agrees to submit all required reports, participate in monitoring and evaluation activities, maintain required project records, and cooperate fully with HUD oversight and performance review processes.

12. **Conflict of Interest**

The Applicant certifies that it has disclosed any actual, apparent, or potential conflicts of interest and will comply with all applicable federal conflict-of-interest requirements.

13. **Debarment and Suspension**

The Applicant certifies that neither it nor its principals are debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from participation in federal assistance programs.

Certification

I certify that I am authorized to execute this Certification and Assurance on behalf of the Applicant organization and that the foregoing statements are true and correct.

Organization: _____

Authorized Representative: _____

Title: _____

Signature: _____

Date: _____

Appendix D: CoC Prohibiting Illicit Drug Enablement in Housing Programs Certification

CONTINUUM OF CARE CERTIFICATION REGARDING SUBSTANCE USE, RECOVERY SUPPORTS, AND PROGRAM COMPLIANCE

As a condition of receiving Continuum of Care (CoC) Program funding, all HUD CoC-funded housing projects shall comply with the following requirements and certifications.

- 1) Prohibited Activities
 - a) No CoC-funded project, recipient, subrecipient, contractor, sponsor, or project operator shall:
 - i) Operate, facilitate, host, or maintain a drug injection site, supervised consumption site, "safe consumption site," or similar facility intended for the consumption of illicit drugs;
 - ii) Knowingly distribute, provide, supply, or facilitate access to drug paraphernalia intended for the use, ingestion, injection, smoking, or consumption of illicit drugs, whether on property under the project's control or through project-sponsored activities conducted elsewhere;
 - iii) Knowingly permit the use, possession, manufacture, sale, distribution, or trafficking of illicit drugs on property owned, leased, managed, or controlled by the project, except as otherwise required by applicable law regarding emergency response, evidence preservation, or law enforcement activities; or
 - b) Nothing in this policy shall prohibit recipients from providing education, referrals, screening, counseling, case management, overdose prevention education, or referrals to substance use disorder treatment, recovery services, behavioral health care, or other lawful supportive services.
 - i) GRCoC CES policy to manage referrals to substance abuse services: <https://irp.cdn-website.com/b42b4d18/files/uploaded/CES+Referrals+to+Recovery+Programs+Policy.pdf>
- 2) Compliance Enforcement
 - a) If the CoC determines that a recipient or project has violated this policy, the CoC may take one or more of the following actions:
 - i) Require a corrective action plan and implementation schedule;
 - ii) Refer findings to HUD for further review or enforcement action.
 - b) The severity of the remedy shall be based on the nature, frequency, duration, and impact of the violation, as well as the recipient's cooperation in addressing identified deficiencies.
- 3) Encouragement of Treatment and Recovery Services
 - a) The CoC strongly encourages recipients and project operators to encourage environments that foster recovery.
 - b) Recipients are encouraged to establish partnerships with treatment providers, recovery organizations, recovery residences, health care providers, and other community resources to promote participant stability, recovery, and long-term housing success.
- 4) Sobriety and Treatment-Based Housing Programs
 - a) This certification is not a requirement that program participants must be sober in order to receive assistance, participate in treatment in order to receive assistance, or be evicted or exited from assistance for a first-time violation of a drug-related program policy or lease requirement. These requirements remain optional under 24 CFR 578.93(b)(5), 24 CFR 578.75(h).
 - b) The CoC recognizes that different project models may appropriately serve different

populations and that recovery-oriented housing, sober housing, treatment-linked housing, and other program models authorized under federal regulations may be utilized to meet community needs.

Certification

By applying for CoC Program funding, the recipient certifies that it has reviewed this policy, understands its requirements, and agrees to comply with all provisions contained herein.

Organization

Authorized Representative

Title

Signature

Date