



## **North Dakota-500 Statewide Continuum of Care**

### **HUD Continuum of Care Program Application**

### **2025 Local Competition Packet** Local Materials for Agencies Applying for CoC Funding

---

## APPLICATION OVERVIEW

The Continuum of Care (CoC) Program (24 CFR part 578) is designed to promote a community-wide commitment to the goal of ending homelessness; to provide funding for efforts by nonprofit providers, states, local governments and Indian Tribes or tribally designated housing entities (as defined in section 4 of the Native American Housing Assistance and Self-Determination Act of 1996 (25 U.S.C. 4103) (TDHEs)) to quickly rehouse homeless individuals, families, persons fleeing domestic violence, dating violence, sexual assault, and stalking, and youth while minimizing the trauma and dislocation caused by homelessness; to promote access to and effective utilization of mainstream programs and programs funded with State or local resources; and to optimize self-sufficiency among those experiencing homelessness.

The goal of the Youth Homelessness Demonstration Program (YHDP) is to support the development and implementation of a coordinated community approach to preventing and ending youth homelessness, and to share that experience with and mobilize communities around the country toward the same end. The population to be served by the demonstration program is youth aged 24 and younger who are experiencing homelessness, including unaccompanied and pregnant or parenting youth.

The Continuum of Care (CoC) Program Competition occurs annually. Each Fiscal Year (FY) Competition process begins with the Registration of CoCs by the CoC-designated Collaborative Applicants, followed by the CoC's review of Grant Inventory Worksheets (GIW) and the release of the CoC Program Notice of Funding Opportunity (NOFO). The competition ends when HUD releases the final funding announcement.

To be eligible for CoC funding in the competition, each CoC must submit a Consolidated Application to HUD by the deadline. The Consolidated Application includes:

1. A CoC Application, which describes the CoC's governance structure, overall performance, and strategic planning process.
2. Project Applications from entities seeking funding for new or renewal projects.
3. The CoC Project Listing that shows the CoC's priorities for funding, ranks each project application, and identifies rejected applications (if applicable).

HUD requires CoCs to rank all project applications, except for CoC Planning and, if applicable, Unified Funding Agency (UFA) Costs project applications. As a project applicant, your agency must participate in the review and ranking process to have the agency's project considered on the CoC Project Listing and included in the CoC Consolidated Application. Projects rejected during the ranking process can submit a Solo Application to HUD.

**This handbook contains essential information that Project Applicants must know about the competition process. Competitive Project Applications must meet HUD eligibility criteria and comply with ND CoC policies, procedures, and timelines.**

### Before you begin:

1. Carefully review and ensure that your agency and project meet HUD's eligibility and threshold criteria. Ineligible projects will not be ranked.
2. CoC ranking and review is a multi-step process. Projects must first complete the Intent to Apply/Threshold steps to be invited to apply. Agencies that do not submit this document cannot apply for CoC funding in this competition. Please review each step and submit the required documents by the ND CoC deadline.
3. Incomplete or inaccurate information may negatively affect the project score. **Late submissions or submissions that do not follow the submission instructions will not be considered.**

4. Project applications are submitted through e-snaps, HUD's web-based grants management system. The ND CoC will host two Application Labs to help access e-snaps and answer questions.
5. To access the application, you need an e-snaps registration and UEI number (formerly DUNS number). Registration for a UEI takes time, so begin as soon as possible.

## BASIC INFORMATION

Funding Opportunity Number: FR-6900-N-25

Federal Assistance Listing: 14.267

### **KEY DATES**

- November 14, 2025 – FY2025 NOFO Published by HUD
- November 24, 2025 – Intent to Apply and Threshold Forms due to CoC
- December 12, 2025 – Project Applications/Required Documentation submitted to CoC
- December 19, 2025 – Revised FY2025 NOFO Published by HUD
- **TBD – NOFO Application Lab – NEW Projects**
- **TBD – NOFO Application Lab – RENEWAL Projects**
- January 12, 2026 – Ranking and Review Committee Meeting
- January 13, 2026 – Project Applications notified of inclusion in CoC Collaborative Application
- January 16, 2026 – Project response and appeals due to CoC
- *January 20, 2026 – Vote on appeals to rank and score (if needed)*
- *January 20, 2026 – Projects notified of appeals outcome and amended rank/score (if needed)*
- January 21, 2026 – Final Project Application edits to CoC
- January 22, 2026 – Recommended Collaborative Application posted on CoC website
- January 22, 2026 – CoC Membership vote on Collaborative Application
- January 22, 2026 – Approved Collaborative Application posted on CoC website

### **HUD DEADLINES**

Normal Track: January 28, 2026, 7 p.m. CST

Extended Track: February 25, 2026, 7 p.m. CST

*Note: Project Applications must be submitted by the Project deadlines listed above, NOT the HUD Consolidated Application deadline.*

### **HUD ANTICIPATED AWARD DATE**

Normal Track: March 31, 2026

Extended Track: April 28, 2026

### **NOFO SUMMARY**

*Available Funds.* Approximately \$3,918,000,000 in funding is available through this NOFO. Of the \$3.9 billion HUD is making available:

- Approximately \$52.0 million is available for Domestic Violence, Dating Violence, Sexual Assault, and Stalking Bonus (DV Bonus) projects.
- Approximately \$129.0 million for the renewal of projects awarded initially as part of the Unsheltered and Rural Homeless Supplemental NOFO. The ND-500 CoC does not receive this funding.
- Approximately \$228.0 million for the competitive renewal and replacement of expiring YHDP grants.
- Estimated funds available in the ND-500 CoC include:
  - Estimated Annual Renewal Demand (ARD): \$3,182,217 (per the GIW)
  - Tier 1: \$954,665
  - Tier 2: \$2,227,552
  - CoC Bonus: \$676,187

- DV Bonus: \$338,094
- Planning Grant: \$169,047

HUD expects to make approximately 7,000 awards from the funds available under this NOFO.

## ELIGIBILITY

To be eligible for funding, applicants must meet all CoC and HUD statutory, regulatory, and threshold requirements. Project Applicants must abide by the CoC deadlines, meet eligibility criteria, request eligible activities, adequately answer all questions, and attach all required documents to be considered eligible for funding.

1. Eligible Applicants. Eligible project applicants for the CoC Program Competition are found at 24 CFR 578.15 and in the Act and include state, local, city or township, special district, and Native American tribal (federally recognized) governments, public housing and Indian housing authorities, Native American tribal organizations (other than Federally recognized tribal governments), nonprofits having a 501(c)(3) (other than institutions of higher education) and others as outlined in the NOFO under the “Additional Information on Eligibility” section. Faith-based organizations may apply on the same basis as any other organization.

Individuals and for-profit entities are ineligible to apply for grants. Additionally, for-profit entities are prohibited from being subrecipients of CoC Program grant funds.

To be eligible for funding under the FY 2025 CoC and YHDP Grants NOFO, project applicants must meet all statutory and regulatory requirements in the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11381-11389 and the CoC Program Rule (24 CFR part 578).

Before applying, applicants must have the following:

- a. SAM Registration. Applicants must be registered with <https://www.sam.gov/SAM> before submitting their application.
- b. Unique Entity Identifier. Applicants must provide a valid UEI number, registered and active at <https://www.sam.gov/SAM>, in the application. A DUNS number is no longer valid.
2. Restrictions. Applicants must comply with the current General Statutory and Regulatory Requirements Affecting Eligibility for HUD’s Competitive Programs. HUD will review eligibility before issuing an award. An application is considered for funding if it satisfies the application review requirements in Section V of the NOFO.
3. Cost Sharing or Matching. This program requires that recipients must match all grant funds, except leasing funds, with no less than 25 percent of funds or in-kind contributions from other sources (24 CFR 578.73)

Project applicants who intend to use program income as a match must provide an estimate of the amount of program income to be used for the match. HUD will not require YHDP Renewal or Replacement projects to meet the 25 percent match requirements if the applicant demonstrates that it has taken reasonable steps to maximize the resources available to youth experiencing homelessness.

---

## PROGRAM DESCRIPTION

The FY 2025 CoC Program NOFO funds the renewal of existing CoC grants, including DV Renewal projects, and the competitive renewal or replacement of existing YHDP grants expiring in Calendar Year 2026. This NOFO also provides funding for new projects, including those created with DV Bonus and CoC Bonus, as well as the reallocation of existing renewal projects.

For FY 2025, HUD requires Collaborative Applicants to rank all project applications, except for CoC Planning, and if applicable, UFA Costs project applications.

### HUD GOALS AND OBJECTIVES

1. Improving outcomes. One of the main objectives for the CoC program, as set out in the McKinney-Vento Act, 42 U.S.C. § 11381(4), is to optimize self-sufficiency among individuals and families experiencing homelessness. CoCs should review all projects eligible for renewal under this NOFO to determine their effectiveness in reducing homelessness and increasing self-sufficiency. CoCs should prioritize projects that promote self-sufficiency, increase employment income over government assistance, and promote treatment and recovery.

This NOFO includes several options to help CoCs improve their effectiveness, including reallocation, expansion, and transition grants, and CoC's should take advantage of these options to expand the pool of successful providers, including faith-based providers, and improve the overall performance of the CoC. This NOFO also makes a significant investment in Transitional Housing and Supportive Service Only projects to ensure that those who can recover and achieve self-sufficiency have the support to do so.

2. Restoring Balance to the Continuum of Care. From 2007 to 2009 there was a nearly equal distribution of Emergency Shelter beds, Transitional Housing beds, and Permanent Supportive Housing beds. During this time, the number of people experiencing homelessness was decreasing consistently. Beginning in 2010, and reinforced by HUD's 2013 NOFO, the distribution of homelessness assistance grew dramatically and became imbalanced.

The numbers cited above, and the graph from HUD's Annual Homelessness Assessment Report, reference nationwide bed counts. The trend and disparities between Permanent Housing and Transitional Housing is even more apparent when narrowed to CoC-funded housing in particular. Last year, 88% of the CoC national award went to Permanent Housing, and only 1% supported transitional housing projects.

Instead of a balanced continuum of assistance, the CoC Program has become a "one size fits all" response to homelessness that restricts the spectrum of eligible program components to one component, excluding a wide array of community providers in the process. By investing in Transitional Housing and Supportive Service Only projects, HUD intends to restore the "continuum" to the Continuum of Care Program to help able-bodied people move to self-sufficiency. Individuals who are likely to never be able to return to the workforce—over 62 years old, physically disabled, developmentally disabled—should be prioritized for Permanent Supportive Housing. Instead, many Permanent Supportive Housing units prioritize certain disabilities over others at the cost of serving the most vulnerable. Many individuals and families that have these certain disabilities, such as impairment due to substance abuse, are able to recover and regain self-sufficiency and deserve every opportunity to receive treatment and services to help them do so.

To the extent permitted by law, HUD is shifting its focus from awarding nearly 90% of CoC funding to Permanent Housing to expand opportunities for other components of the CoC Program, and it is also prioritizing Permanent Housing that has robust services with participation requirements.

3. Prioritizing treatment and recovery. According to a nationwide study, 75% of a survey sample of 64,000 people experiencing unsheltered homelessness reported a substance use disorder and 78% reported a mental health condition. The study found that substance use disorder contributed to the loss of housing for 50% of the unsheltered population, and mental health

conditions contributed to loss of housing for 51% of the population. Another study found that two-thirds of people experiencing homelessness self-reported regular use of hard drugs like methamphetamine, cocaine, and opiates. Of those, 29% reported wanting treatment and being unable to receive it. Based on HUD's 2024 Point-In-Time Count data, which asks individuals if they wish to self-report substance abuse, 24.7% of individuals experiencing unsheltered homelessness select to self-report substance abuse. The results of ignoring the prevalence of substance use disorder among people experiencing homelessness is deadly.

According to a 2022 study from JAMA, "deaths among people experiencing homelessness in San Francisco more than doubled to 331 deaths during the first year of the COVID-19 pandemic, driven by a large increase in overdose deaths." The risk of fatal overdose inside Permanent Supportive Housing is noteworthy, and tragic. The City of Seattle reported a 282% increase in overdose deaths in King County's Permanent Supportive Housing (and other subsidized housing) between 2020 and 2023. According to HUD's own data, 19.5% of exits from Permanent Supportive Housing among adults living alone are due to death. Between 2019 and 2022, the share of adults living alone who died in Permanent Supportive Housing increased from 13% of exits to 20%, and the number of adults who died increased by 31%.

A National Academies of Sciences, Engineering, and Medicine review of studies on Permanent Supportive Housing concluded that "there is no substantial published evidence as yet to demonstrate that Permanent Supportive Housing improves health outcomes or reduces healthcare costs" and that "the studies reviewed did not demonstrate improvements in psychiatric symptomatology or substance use behavior." This review was published in 2018, just prior to the explosion of Fentanyl use in the U.S.

Despite the tragic realities of substance abuse and fatal overdose among people experiencing homelessness or living in Permanent Supportive Housing, there are recipients of CoC funding who reportedly, under the misnomer of "harm reduction", permit, and even encourage, the use and distribution of illicit drugs on their property including by distributing drug paraphernalia like needles, pipes, and foil. This NOFO provides communities opportunities to invest in treatment services and recovery housing, and prohibits recipients from distributing drug paraphernalia or permitting the use and distribution of fatal, illicit drugs on their properties.

CoCs should prioritize projects that provide the treatment and services people need to recover and regain self-sufficiency including on-site behavioral health treatment, robust wraparound supportive services, and participation requirements. This NOFO devotes resources to Transitional Housing programs and Supportive Service Only projects with the goal of improving health and long-term economic independence for individuals and families experiencing homelessness. HUD encourages CoCs to utilize the full array of mainstream programs and local and private resources to provide housing and healthcare needed to maintain safe and stable housing.

4. Promoting Economic Self-Sufficiency. One of the primary purposes of the CoC Program, as outlined in 42 U.S.C. § 11381, is to optimize self-sufficiency. In fact, self-sufficiency is one of only four purposes Congress provided for the CoC Program. CoCs should partner with workforce development centers, employers, childcare, and other supportive service providers to increase employment and employment income for program participants. CoCs should prioritize projects that help lead to long-term economic independence for individuals and families to exit homelessness to unsubsidized housing and prevent future returns to homelessness.

Although a chief goal of the program is self-sufficiency, HUD's data reveals low rates of increased employment income and exits to unsubsidized housing. As of 2023, a median of only 6% of individuals in CoC-funded housing across the nation increased their earned, employment income during that reporting period. In comparison, 33% of individuals in CoC-funded housing increased their benefits and welfare income. Nationwide, 76.1% of Permanent Supportive Housing residents are under age 65, with a significant 17.4% under age 18. Yet in Permanent Supportive Housing, only 13.2% of all households exited their housing. Of that percentage, only

12.9%, or 1.7% of participating households, exited to unsubsidized housing. Nearly twice as many exits were due to death.

One way to advance both recovery and self-sufficiency is through supportive service participation requirements. Service participation requirements have been successfully employed in most federal social service programs and were integral to the welfare policy reforms enacted under President Clinton in 1996. For example, PELL Grants require recipients to make satisfactory academic progress, attend classes, and maintain a passing grade point average. Unemployment insurance benefits require program participation, including demonstrated participation in prescriptive job searches. Temporary Assistance for Needy Families (TANF) requires beneficiaries to work or advance their education.

According to a national poll in 2024, there is strong bipartisan support for supportive service participation requirements, with 69% of respondents in favor of “requiring participation in programs for housing benefits.”[12]

In accordance with 24 CFR 578.75(h), HUD encourages supportive service agreements that meet individual needs and advance individual progress towards self-sufficiency and independent living goals set forth in 42 U.S.C. 11386a(b)(1)(F).

5. Creating Competition to Improve Innovation and Accountability. The Continuum of Care Program was intended to be a “national competition between geographic areas” (42 U.S.C § 11386a), which is also consistent with Office of Management and Budget requirements that federal grants be awarded on a competitive, objective basis, even for renewals. 2 CFR 200.205, 200.309. Last year, 90% of every CoC’s Annual Renewal Demand was conditionally awarded without any connection to CoC score or project merit. This means that only about 10% of CoC awards were competed on the basis of merit between geographic areas. In fact, since 2013, the most competitive CoC competition required only 15% competition on the basis of merit, and the least competitive required merely 5% competition.

Competition drives outcomes, effectiveness, innovation, and accountability which is why HUD is competing 70% of Annual Renewal Demand on the basis of merit between geographic areas. Increased competition brings the CoC Program back to its original intent as a competitive program, not an entitlement program or block grant. Competition ensures that CoCs consistently evaluate the effectiveness of their projects and invest in new projects that deliver the best results at reducing homelessness and optimizing self-sufficiency. The historic lack of competition has meant that the same projects are awarded every year regardless of their impact on homelessness.

6. Ending the Crisis of Homelessness on Our Streets. The number of people experiencing unsheltered homelessness is at an all-time high. People living on the streets and in encampments have high rates of substance use disorder and mental illness. HUD intends to focus increasingly on reductions in unsheltered homelessness and movement through Transitional Housing and out of Permanent Housing to self-sufficiency.

CoCs should direct resources towards outreach, intervention, and assistance that helps people move out of unsheltered homelessness and regain self-sufficiency. By expanding opportunities for new providers and historically disincentivized program components, HUD is assisting community-wide efforts to address homelessness with the most effective solutions.

7. Advancing Public Safety for All. Safety and security for all members of the public, especially those living unsheltered, is essential to promoting a community-wide commitment to the goal of ending homelessness. CoCs should cooperate with law enforcement to advance public safety for the entire community impacted by homelessness. No one should sleep outside on the street or in dangerous encampments, and everyone should be able to enjoy public spaces safely. HUD encourages CoCs to assist in preventing and minimizing the trauma associated with living on the streets or in encampments, especially for women and youth that are the victims of sexual assault and trafficking. Unchecked public camping and public illicit drug use inhibit nonprofit providers and local government from effectively addressing homelessness.

Respecting the rule of law is critical to community-wide efforts to address homelessness and protect all residents. According to one report, as unsheltered homelessness increased in King County, gun crimes tied to homeless encampments increased by 122% in just the first six months of 2022. Between 2017 and 2020, 50% of all arrests in Portland, Oregon were of individuals experiencing homelessness despite the homelessness population comprising only 2% of the total population. According to the same report, drug overdoses were the most common cause of death among individuals experiencing homelessness in New York City between 2018 and 2021. The number of deaths doubled during that short time period. One recent study indicates that in some states, as many as half of unsheltered individuals experiencing homelessness are registered sex offenders.

None of the realities above suggest that the entire population experiencing homelessness is engaged in criminal or illicit activity despite significant disproportionality. Data also indicates that people experiencing homelessness are the victims of crime at higher rates than the general public. Gun violence in encampments, fatal drug overdoses on the streets, and sexual assault in encampments all perpetuate harm and trauma to individuals experiencing homelessness. It is common sense to acknowledge the close relationship between unchecked homelessness and illicit activity with its many victims. Enforcing the rule of law is critical to protecting the safety of everyone regardless of their housing status, which in turn promotes one of the core purposes of McKinney-Vento, “community-wide commitment to the goal of ending homelessness.” 42 U.S.C. § 11381(1).

In 2024, The City of Seattle reported that 76% of residents surveyed in a downtown neighborhood disagreed or strongly disagreed with the statement “I feel safe in my neighborhood.” The respondents included residents of three Permanent Supportive Housing buildings in the neighborhood. The city described a downtown environment that creates “opportunities for illegal street markets, drug markets, and unsanctioned tent encampments to form.”

The public is supportive of policies that advance public safety related to homelessness. According to national polling in 2024, there is strong bipartisan support for public camping bans and stricter enforcement of drug laws, with 72% of voters in favor of “moving individuals into shelters over allowing camping” and 60% of voters in favor of “stricter drug enforcement near service, providers, including penalties for facilities permitting drug activity.”

Advancing public safety policies has been shown to decrease homelessness. Two years after the City of Austin reinstated a ban on public camping, unsheltered homelessness decreased by one-third. Several years after Colorado Springs restricted public camping near creeks and waterways, unsheltered homelessness decreased by 14%.

First responders are critical partners in engaging people into treatment and services and protecting public order and vulnerable individuals experiencing homelessness. In *Grants Pass v. Johnson*, the Supreme Court of the United States upheld the authority of local governments to prohibit public camping.

First responders and law enforcement are often the first to encounter our most vulnerable members of society and should be aware of the available services to triage individuals into safe and appropriate services, ideally alongside non-law enforcement service providers in the Continuum of Care. Executive Order 14321 reflects the need for cooperation. CoCs should work with law enforcement, first responders, and their state and local governments to reduce encampments, public camping, and public drug use in order to address barriers to maintaining housing and increasing self-sufficiency.

8. Minimizing Trauma. One of the purposes of the CoC program is to minimize the trauma associated with homelessness 42 U.S.C. § 11381(2). CoCs should encourage providers to provide trauma informed care and ensure participant safety in programs, especially for youth and survivors of domestic violence, dating violence, sexual assault, and stalking. Women experiencing homelessness or domestic violence should have access to safe, single-sex spaces and other considerations for personal privacy (24 CFR 578.93(b)).

9. Expanding Access Based on Merit, not Ideology. HUD is committed to providing an equal opportunity to every applicant, recipient, and program participant free from discrimination. Part of this commitment is recognizing that faith-based providers deserve a level playing field to compete for CoC funding and participate in the community-wide efforts of their local CoCs. Faith-based organizations first served the nation’s homelessness population long before the Federal government was ever involved.

To the fullest extent permitted by law, HUD will ensure that faith-based organizations can participate in the CoC program and operate consistent with their sincerely held religious beliefs, recognizing all relevant protections provided by subsection c of HUD’s Equal Participation Rule, 24 CFR § 5.109, the Religious Freedom Restoration Act, and the First Amendment. Promoting equal access for faith-based organizations directly advances the goals of the CoC program by increasing the number and diversity of program providers and increasing overall competition for CoC funds.

Likewise, HUD is committed to promoting equal access to CoC programs for homeless individuals and program participants regardless of their race or other protected status. The prior administration wrongly and illegally pressured or required providers to discriminate against participants based on their race, sex, or other protected status. In *Students for Fair Admissions (SFFA) v Harvard*, 600 U.S. 181 (2023), the Supreme Court ruled Harvard’s race-conscious admissions violated the Fourteenth Amendment’s Equal Protection Clause, effectively ending affirmative action as previously practiced by using race as a “plus” factor for diversity, finding it led to racial stereotyping, lacked a logical endpoint, and failed strict scrutiny by not being narrowly tailored to serve a compelling government interest. HUD believes that these harmful and illegal practices promoted division and waste and wants to increase access to homelessness relief for all individuals and families.

For additional information on the studies quoted in HUD’s goals and objectives listed above, please refer to the NOFO.

#### **AUTHORITY**

The CoC Program is authorized by subtitle C of title IV of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11381–11389) (the Act), and the CoC Program rule found in 24 CFR part 578 (the Rule). Pursuant to 42 U.S.C. 11386a(a) and 42 U.S.C. 11386a(b)(1)(G), the Secretary can establish criteria for the awarding of funds, including factors deemed appropriate to carry out the CoC Program in an effective and efficient manner.

Under this NOFO, HUD will competitively renew or replace YHDP grants under the CoC Program.

#### **INDIRECT COSTS**

If the applicant expects to charge indirect costs to the award, the Indirect Cost Rate Certification must be submitted (HUD-426) in the e-snaps application. For additional information on indirect costs, please refer to the NOFO.

#### **PROGRAM HISTORY**

FY 2025 CoC awards will be made through this NOFO. This NOFO rescinds and supersedes any mention of awards of FY 2025 CoC funds in the FY 2024 and FY 2025 Continuum of Care Competition and Renewal or Replacement of Youth Homeless Demonstration Program Grants published on July 31, 2024, and includes several changes.

1. Investment in New Permanent Housing with Robust Supportive Services for Individuals and Families with a Disability. This NOFO provides a set-aside of 30% of all ESG and COC funds, as contained in 42 U.S.C. § 11386b, for new permanent housing projects for homeless individuals and families with disabilities, including PH-PSH and PH-RRH. As outlined in the Threshold Criteria in V.A.4, new PH-PSH and PH-RRH projects must serve individuals and families with disabilities.

This NOFO aligns with the program statutory requirements to fund new permanent housing. CoCs have discretion to determine if or how much of their Annual Renewal Demand (ARD) will be used for the creation of new Permanent Housing projects.

For CoCs applying for new Permanent Housing projects, those projects:

- Must be submitted by the Extended Track deadline.
- Must be ranked by the CoC in an Extended Track Priority Listing.
- Must not be included in the Normal Track FY25 CoC Priority Listing.
- May be CoC Bonus projects.
- May be DV Bonus projects, if it meets DV and new project criteria.
- May be the expansion portion of an expanding renewal project.
- May be Transition Grant projects.
- Will not be considered if they exceed the CoC's maximum award based on the CoC's combined Priority listings. In other words, these projects should not, in combination with the Normal Track FY25 CoC Priority Listing, exceed the CoC's maximum award amount.

2. Two-Track Application Process for Increased Flexibility. In order to provide time and flexibility for CoCs to solicit new Permanent Housing project applications, HUD is creating a separate deadline for new Permanent Housing projects.

Normal Track: \$2,655,600,000 in funding, January 28, 2026 deadline and March 31, 2026 estimated award date. HUD reserves the right to award projects in Tier 1 of CoC Priority Listings prior to the rest of awards.

3. Extended Track: \$1,262,400,000 in funding, February 25, 2026 deadline and April, 22, 2026 estimated award date. For new Permanent Housing projects only.
4. FY 2025 CoC Consolidated Application. All CoCs must complete and submit the FY 2025 CoC Consolidated Application that includes the CoC Application and CoC Priority Listing with all submitted projects ranked or rejected based on the criteria set forth in the NOFO. CoCs applying for new Permanent Housing projects on the Extended Track timeline must submit a separate Extended Track Priority Listing of new Permanent Housing projects. CoCs should not submit projects in Normal Track and Extended Track that, when combined, exceed their maximum award amount.
5. Increase in Competition. The CoC program is a national competition. Tier 1 is set at 30 percent of the CoC's Annual Renewal Demand (ARD). HUD reserves the right to award projects in Tier 1 of CoC Priority Listings prior to the rest of awards.
6. Investment in Transitional Housing and Supportive Service Only Projects. In order to promote balance and increase competition, no more than 30 percent of a CoC's ARD under this NOFO will fund the renewal of Permanent Housing projects, including PH-PSH, PH-RRH, and Joint TH and PH-RRH projects.
7. Program Components that are Eligible under the NOFO. Provisions at 24 CFR 578.37 provide that CoC funds may be used for projects under five program components: transitional housing, supportive services only, HMIS, permanent housing (including rapid re-housing and permanent supportive housing), and in some cases, homelessness prevention. This NOFO is different than prior years in that applicants may apply for Transitional Housing (TH) and Supportive Services Only (SSO) projects including street outreach. Only designated High Performing Communities (HPC), may carry out homelessness prevention activities through the CoC program and there are currently no HPCs. Therefore, the four components that will be funded through this CoC Program Competition are: (a). Transitional Housing; (b). Supportive Services Only; (c). Permanent Housing; and (d). HMIS. Additionally:
  - a. HUD will allow renewal project applications for Joint TH/PH-RRH component projects. No new Joint TH/PH-RRH projects will be allowed.
  - b. Project applicants may apply for SSO projects consistent with 24 CFR 578.37 and 578.53, including projects with the outreach service activity described at 24 CFR 578.53(e)(13) to

individuals and families primarily residing in places not meant for human habitation. These projects must meet the project quality threshold criteria in section V.A.4.b.(5)(c) of the NOFO. All other SSO projects, except those dedicated to coordinated entry, must meet the threshold criteria in section V.A.4.b.(5)(b) of the NOFO.

8. Reallocation. CoCs may reallocate funding from any eligible renewal grant, including grants that have not previously renewed under the CoC Program, so long as the project has an executed grant agreement with an expiration date in Calendar Year 2026.
9. Competitive Renewal or Replacement of YHDP Grants. HUD will competitively renew or replace YHDP projects. Additionally, CoCs may reallocate YHDP projects to create new YHDP grants. If significant changes to a renewing YHDP project are needed, the YHDP project may replace its current project with a new YHDP Replacement project, that may wholly or in part include activities ineligible under the CoC Program as outlined in section IV.D.1.h of the NOFO.

## **OTHER INFORMATION**

1. CoC Program NOFO Requirements. All requirements for submitting the entire CoC Consolidated Application, including applications for projects eligible for FY 2025 CoC and YHDP funding and the total amount of funds available, are contained in the NOFO. Applicants should read this information carefully and respond to all submission requirements and deadlines as described. For additional information on CoC Program NOFO Requirements, please refer to the NOFO.
2. Eligible Renewal Projects. YHDP and CoC projects originally funded in FY 2024 or earlier, including projects originally funded under the Special NOFO or DV Bonus are eligible to renew under this NOFO, provided the projects have an expiration date in CY 2026 (between January 1, 2026, and December 31, 2026). Renewal project applications must be submitted by the recipient currently under grant agreement to operate the project. See section IV.D.2 of the NOFO for more information on renewal project requirements.

In cases where an expiring grant agreement is amended to have a new recipient after a renewal application is submitted, the new recipient will be eligible to receive the renewal award (Section V.D.8 of the NOFO).

3. Reallocation. Reallocation is a process CoCs use to shift funds in whole or in part from existing eligible CoC renewal projects to create one or more new projects without decreasing the CoC's ARD. CoCs may only reallocate eligible renewal projects so long as the renewal project being reduced or eliminated has a current grant agreement with an expiration date in CY 2026. Additionally, new projects created through reallocation must meet the project eligibility and project quality thresholds established in sections V.A.4.a and V.A.4.b of the NOFO. For more information on the requirements for projects created through reallocation, see sections IV.D.1.e and IV.D.1.f (DV Reallocation), IV.D.1.g (CoC Reallocation), and IV.D.1.i (YHDP Reallocation) of the NOFO.

To create a Transition Grant through the reallocation process, the CoC must wholly eliminate one or more projects and use those funds to create the single, new transition grant (see section IV.D.1.l of the NOFO).

4. Joint TH/PH-RRH Component Project. The Joint TH/PH-RRH component project combines two existing program components – Transitional Housing and Permanent Housing-Rapid Rehousing – in a single project to serve individuals and families experiencing homelessness.

If funded, HUD will limit eligible costs as follows, in addition to other limitations found in the Rule:

- a. leasing of a structure or units, and operating costs to provide transitional housing;
- b. short- and medium-term tenant-based rental assistance on behalf of program participants to pay for the RRH portion of the project;
- c. supportive services;

- d. costs of contributing data to the HMIS; and
- e. project administrative costs.

For additional information on this component, please refer to the NOFO.

5. Supportive Services Only (SSO) Project not Dedicated to Coordinated Entry. Project applicants may apply for SSO projects consistent with 24 CFR 578.37 and 578.53, including projects with the outreach service activity described at 24 CFR 578.53(e)(13) to individuals and families primarily residing in places not meant for human habitation. Projects that are primarily providing these outreach services and identify themselves as such in the project application, must meet the project quality threshold criteria in Section V.A.4.b.(5)(c) of the NOFO. All other SSO projects, except those dedicated to coordinated entry, must meet the threshold criteria in Section V.A.4.b.(5)(b) of the NOFO.
6. Centralized or Coordinated Assessment System (Coordinated Entry). In general, 24 CFR 578.23(c)(9) and (11) requires all CoC program recipients and subrecipients to use the centralized or coordinated assessment system established by CoCs. The definition of Centralized or Coordinated Assessment (also known as Coordinated Entry) is found at 24 CFR 578.3. 24 CFR 578.7(a)(8) details the responsibilities of the CoC to establish and operate this required system. Please refer to the NOFO for additional information.
7. Non-Dedicated Permanent Supportive Housing Beds. Please refer to the NOFO for information.
8. Beds Dedicated to Chronically Homeless Individuals and Families. Please refer to the NOFO for information.
9. DedicatedPlus Project. Please refer to the NOFO for information.
10. Participant Eligibility. Projects funded through this NOFO must have the following eligibility criteria for program participants. All references to paragraphs of the definition of homeless that are found throughout this NOFO refer to the paragraphs listed under the definition of "homeless" in 24 CFR 578.3 and include the definition of "homeless" under section 103(b) of the McKinney-Vento Homeless Assistance Act, even if section 103(b) is not explicitly referenced. All specific references to the definition of "homeless" under paragraph (4) of 24 CFR 578.3 that are found throughout this NOFO also include the definition of "homeless" under section 103(b) of the McKinney-Vento Homeless Assistance Act, even if section 103(b) is not explicitly referenced. All projects must participate in coordinated entry, and the selection of program participants must be consistent with the CoC's coordinated entry process. Please refer to the NOFO for additional information.
11. Performance-Based Decisions. The CoC must review each project application submitted to the CoC for inclusion on the FY 2025 CoC Priority Listing as part of the CoC Consolidated Application and either approve and rank or reject project application submissions. All project applications approved by the CoC must be listed on the CoC Priority Listing in rank order. Please refer to the NOFO for additional information.
12. Coordination with Housing and Healthcare. The Consolidated Appropriations Act, 2024, directs HUD to provide incentives to create projects that coordinate with housing providers and healthcare organizations to provide permanent supportive housing and rapid rehousing services. In the 2025 CoC Program Competition, CoCs may receive up to 4 points on the CoC Application if the FY 2025 CoC Priority Listing includes new TH, PH-PSH, or PH-RRH project applications created through reallocation or CoC Bonus that utilize housing resources and healthcare provided through an array of healthcare services and housing providers.

# APPLICATION CONTENTS AND FORMAT

Applications must include three main elements: a) standard forms, assurances, and certifications; b) budget; and c) narratives and other attachments. The content, forms, and format for each element are included in section IV of the NOFO. Please use the checklist in Section IV of the NOFO to ensure a complete application is submitted in e-snaps. Additionally, please ensure that all local competition documentation is submitted to the ND CoC.

While the CoC Program NOFO is officially posted on Grants.gov, the standard forms, assurances, certifications, budgets, narrative responses, and the ability to include attachments are built into e-snaps.

## STANDARD FORMS, ASSURANCES, AND CERTIFICATIONS

A list of all standard forms, assurances, and certifications that must be properly completed and submitted with the application is available in section IV.A. of the NOFO. Please refer to the NOFO for additional information.

## BUDGET

A budget must be submitted with your application to support your project narrative. The project application in e-snaps includes the budget forms available under the NOFO.

1. **Eligible Costs.** Except as otherwise stated in the NOFO, 24 CFR 578.37 through 578.63 identifies the eligible costs that applicants may request.
  - a. **YHDP Costs.** Eligible costs for YHDP projects originally funded under the YHDP Competition are also eligible YHDP Renewal projects costs under the NOFO.
  - b. **Special YHDP Activities.** YHDP Renewal and YHDP Replacement including Reallocation projects may submit applications that include special YHDP activities that are ineligible under the CoC Program. Please refer to the NOFO for additional information.
  - c. **VAWA Costs Information.** HUD has determined that eligible activities paid for under the VAWA costs category are not subject to the CoC program's spending caps on administrative costs under section 423(a)(10), (11), and (12). This activity may be included in new project applications, added to eligible renewal projects through expansion or added to eligible renewal projects by shifting up to 10 percent of funds from one eligible activity to the VAWA costs line item. Please refer to the NOFO for additional information.
  - d. **Rural Costs Information.** HUD has determined that eligible activities paid for under the rural costs category may be included in new project applications or added to eligible renewal projects through expansion. Please refer to the NOFO for additional information.

## NARRATIVES AND OTHER ATTACHMENTS

Narrative and non-form attachments must be uploaded in e-snaps. Attachments may be uploaded in PDF, Word, or Excel formats.

Project applicants will provide narrative responses to questions in e-snaps that demonstrate their ability to meet project eligibility and project quality threshold requirements.

## OTHER APPLICATION CONTENT

**Eligible Project Applications.** The following types of project applications will be eligible for completion and submission.

1. **CoC Planning Projects.** All Collaborative Applicants are eligible and encouraged to apply for CoC Planning funds. Planning projects will not affect a CoC's available amount for new and renewal project applications because it is not included in the CoC's ARD calculation.
2. **CoC Bonus Projects.** The CoC Bonus allows CoCs to use up to 20 percent of their Final Pro Rata Need to create one or more new project applications. New projects developed through the

CoC Bonus must meet the project eligibility and project quality threshold requirements established by HUD.

3. *DV Renewal Projects.* Eligible renewal projects that were previously funded, in whole or in part, with DV Bonus funding or were at some point expanded using DV Bonus funding to continue to serve individuals and families who are fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking.
4. *DV Bonus and DV Reallocation Projects.* A new project that is dedicated to serving individuals and families who are fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking. However, a DV Bonus project may not exclusively serve people fleeing or attempting to flee human trafficking. CoCs may apply for up to 10 percent of their Preliminary Pro Rata Need for DV Bonus projects. Please refer to the NOFO for additional information.
5. *New Projects Created through DV Bonus or DV Reallocation Process.* DV Bonus and DV Reallocation may only be used to create new SSO-Coordinated Entry, Rapid Rehousing, and Transitional Housing projects. Please refer to the NOFO for additional information.
6. *New Projects Created with CoC Bonus or through CoC Reallocation Process.* CoCs may apply for the following types of new CoC projects through the CoC Bonus or Reallocation process:
  - a. SSO
  - b. TH
  - c. PH-PSH
  - d. PH-RRH
  - e. Dedicated HMIS project that may only be carried out by the HMIS Lead, which is the recipient or subrecipient of an HMIS grant and is listed as the HMIS Lead on the CoC Applicant Profile in e-snaps.
  - f. SSO-CE project to develop or operate a Coordinated Entry system.

Please refer to the NOFO for additional information.

7. *Youth Homeless Demonstration Program (YHDP).* To ensure the best use of federal dollars, HUD will competitively award all YHDP projects, including renewal and replacement projects. CoCs seeking to reallocate YHDP projects may do so only to other youth projects. Please refer to the NOFO for additional information.
8. *New YHDP Projects Created through YHDP Replacement Process.* CoCs may replace renewing YHDP projects by creating one or more new YHDP Replacement projects. HUD will only fund the following for new YHDP Replacement projects:
  - a. TH or Crisis Residential Transitional Housing
  - b. SSO
  - c. SSO-CE
  - d. SSO – Host Home and Kinship Care
  - e. HMIS

Please refer to the NOFO for additional information.

9. *Expansion Project.* The process used by eligible renewal project applicants to add funds to an existing CoC Renewal, DV Renewal, or YHDP Renewal project to expand its current operations, either through reallocation, a DV Bonus, or a CoC Bonus project application. The new funding being added to the existing renewal must be submitted as a new project in e-snaps. This portion of the project is known as the new expansion project.

HUD will allow project applicants to apply for new expansion projects to expand existing projects that increase the number of units, persons served, services provided to existing program participants, or add activities to HMIS and SSO-CE projects. Please refer to the NOFO for additional information..

10. *Consolidation Project.* Applicants intending to use the consolidation process to combine two or more, but no more than 10, eligible renewal projects (including renewing YHDP projects and renewal Special CoC NOFO Competition projects), may do so through the renewal project application. The projects being combined during a grant consolidation will continue uninterrupted. To be eligible for consolidation, the projects must have the same recipient and be for the same component. Please refer to the NOFO for additional information.
11. *Transition Grant.* A transition grant is an application to fund a new CoC project through the reallocation process, transitioning an eligible CoC renewal project (including a Special NOFO project or DV Renewal project) from one program component to another eligible component over 1 year. The renewal project transitioning to a new component must be eliminated through reallocation. Transition grant applications awarded FY 2025 funds must fully transition to the new component by the end of the 1-year grant term. They may apply for renewal only in the next CoC Program Competition under the component to which they transitioned. Please refer to the NOFO for additional information.

Renewal Project Requirements. Projects may renew under the CoC Program NOFO to continue ongoing leasing, operating, supportive services, rental assistance, HMIS, and project administrative costs.

Awards HUD made under the CoC Program and projects originally awarded under YHDP are eligible for renewal with FY 2025 CoC Program funds if they are currently operating and have an expiration date in CY 2026. Please refer to the NOFO for additional information.

New Project Requirements. CoCs are encouraged to submit new projects created through CoC Bonus, CoC Reallocation, DV Reallocation, or YHDP Replacement, including YHDP Reallocation. Please refer to the NOFO for additional information.

# APPLICATION REVIEW INFORMATION

## THRESHOLD REVIEW

HUD and the ND Continuum of Care review each application to ensure it meets the following threshold requirements. If the applicant meets all threshold requirements, your application will be invited to submit an application to the ND CoC and will advance to a merit review with HUD. If the applicant fails to meet one or more of the threshold requirements, the ND CoC will not accept the application and HUD will not review it.

1. *Eligible Applicant.*
  - a. Eligible project applicants include non-profit organizations, states, local governments, instrumentalities of local governments, Indian Tribes and Tribally Designated Housing Entities (TDHE), and public housing authorities. For-profit organizations are ineligible to apply for grants and are prohibited from being subrecipients. Individuals are ineligible to apply for grants.
  - b. Collaborative Applicants. Only CoCs with a valid FY 2025 e-snaps registration will have access to the FY 2025 CoC Program and YHDP Funding Opportunity.
  - c. Indian Tribes and TDHEs. Indian Tribes and TDHEs are allowed to be Collaborative Applicants, eligible entities, or subrecipients of the CoC Program. Indian Tribes or TDHEs may create a CoC, be a Collaborative Applicant, be an eligible project applicant, or receive grant amounts from another entity that receives a grant directly from HUD. However, only states, units of general local government, nonprofit organizations, and public housing authorities may administer permanent housing rental assistance.
  - d. Solo Applicants. Eligible project applicants who attempted to participate in the CoC planning process in the geographic area in which they operate and believe they were denied the right to participate reasonably may submit a solo project application to HUD. If HUD finds in favor of the solo applicant, HUD may award grant funds. Solo applicants requesting FY 2025 funding must submit their solo project application in e-snaps to HUD by 8:00 PM EST on January 14, 2026.
2. *Resolution of Civil Rights Matters.* Applicants with outstanding, unresolved judgments against them for violations of civil rights laws must resolve those judgments before the application submission deadline; otherwise, they will be deemed ineligible.
3. *Timely Submission of Applications.* Late applications are not eligible for funding. Applicants should review all HUD and local ND CoC competition deadlines to ensure they submit applications on time.
4. *Threshold Criteria.* Applicants who fail to meet the following threshold eligibility requirements are ineligible.
  - a. Project Eligibility Threshold. Eligibility threshold requirements are determined by HUD and the ND CoC using a pass/fail standard.
    - Project applicants and potential subrecipients must meet the eligibility requirements of the CoC Program.
    - Project applicants and subrecipients must demonstrate the financial and management capacity and experience to carry out the project as detailed in the application and the capacity to administer federal funds.
    - Project applicants must submit the required certifications specified in the NOFO.
    - The population to be served must meet program eligibility requirements.
    - Project applicants must agree to participate in the local HMIS or a CoC-approved comparable database for DV providers.

- Project applicants must certify affirmatively to the following:
  - The project applicant will not engage in racial preferences or other forms of illegal discrimination.
  - The project applicant will not operate drug injection sites or “safe consumption sites,” knowingly distribute drug paraphernalia on or off of property under their control, permit the use or distribution of illicit drugs on property under their control, or conduct any of these activities under the pretext of “harm reduction.”
- b. Project Quality Threshold. HUD and the ND CoC will review all new project applications to determine if they meet the following project quality threshold requirements.
  - HUD will consider any project requesting renewal funding as having met project quality threshold requirements through its previously approved grant application.
  - HUD will consider YHDP Replacement project applications as having met project quality threshold requirements if the project application activities and costs are eligible under the NOFO.
  - HUD will assess all new project applications for the following minimum project eligibility, capacity, timeliness, and performance standards.
    - Project applicants must have satisfactory capacity, drawdowns, and performance for existing grants funded under the CoC Program. This does not apply to project applicants who have not previously received CoC funding.
    - For expansion project applications, project applicants must describe the part of the project that is being expanded and demonstrate that the project is not replacing other funding sources.
    - Project applicants must demonstrate their ability to meet all timeliness standards per 24 CFR 578.85. HUD and the ND CoC reserve the right to deny an application for a new project if the request is made by an existing recipient that HUD finds to have significant issues related to capacity, performance, unresolved audit or monitoring findings related to one or more existing grants, or does not routinely draw down funds at least once per quarter. HUD also reserves the right to withdraw funds if no APR is submitted on the prior grant.
  - HUD reserves the right to verify past performance and evaluate the eligibility of project applications submitted during this competition for the following reasons:
    - Evidence that the project conducts activities that subsidize or facilitate illegal discrimination, including illegal racial preferences.
    - Evidence that the project operates illegal drug injection sites or “safe consumption sites” in violation of 21 U.S.C. § 856.
  - Additionally, for HUD to consider new projects as meeting the quality threshold, each new project must meet the criteria outlined in the table on pages 63-73 of the NOFO.
- c. Project Renewal Threshold. Renewal projects must meet the minimum project eligibility, capacity, timeliness, and performance standards identified in the NOFO.
  - HUD will review information in eLOCCS, APRs, and information provided from the local HUD CPD field office, including monitoring and audit reports, and performance standards on prior grants, and will assess projects using the following criteria on a pass fail basis.
    - Whether the project applicant’s performance met the plans and goals established in the initial application or grant as amended.

- Whether the project applicant demonstrated that all timeliness standards for grants being renewed have been met, including those standards for the expenditure of grant funds.
- The project applicant's performance in assisting program participants to achieve and maintain self-sufficiency and independent living, and records of success, except for dedicated HMIS projects.
- Evidence of unwillingness of project applicants to accept technical assistance, a history of inadequate financial accounting practices, indications of project mismanagement, a drastic reduction in the population served, program changes have been made without prior HUD approval, or the loss of project site control.
- HUD reserves the right to reduce or reject a project application submitted during the competition for the following reasons:
  - Outstanding obligation to HUD that is in arrears or for which a payment schedule has not been agreed upon.
  - Audit finding(s) for which a response is overdue or unsatisfactory.
  - History of inadequate financial management accounting practices.
  - Evidence of untimely expenditures on prior award.
  - History of other major capacity issues that have significantly affected the operation of the project and its performance.
  - History of not reimbursing subrecipients for eligible costs promptly, or at least quarterly.
  - History of serving ineligible program participants, expending funds on ineligible costs, or failing to expend funds within statutorily established timeframes.
  - Evidence that the project conducts activities that subsidize or facilitate illegal discrimination, including illegal racial preferences.
  - Evidence that the project operates illegal drug injection sites or "safe consumption sites" in violation of 21 U.S.C. § 856.

### **MERIT REVIEW**

HUD will evaluate and score applications using the merit criteria and process as outlined in the NOFO. The ND CoC will use some scoring criteria from the NOFO as well as additional factors for this competition. Project applications must include a response to the requirements outlined in the NOFO, as well as any additional information requested by the ND CoC.

### **RISK REVIEW**

Before making an award, HUD will evaluate each applicant's likelihood of successfully implementing an award based on the criteria outlined in the NOFO.

### **SELECTION PROCESS**

Please review the NOFO for information regarding HUD's selection process.

The ND CoC will review all Intent to Apply documents submitted by projects to ensure threshold requirements are met before inviting an applicant to continue in the application process. The ND CoC will follow the same method as in previous years, rating and ranking projects in a two-tier system.

1. *Tier 1.* Tier 1 is equal to 30 percent of the CoC's Annual Renewal Demand (ARD). HUD will conditionally select project applications in Tier 1 from the highest scoring CoC application to the lowest scoring CoC application and according to the rank assigned by the CoC on the CoC Priority listing, provided the project applications pass both project eligibility and project quality threshold review, and if applicable, project renewal threshold.

2. *Tier 2.* Tier 2 is the difference between Tier 1 and the sum of each CoC's ARD, CoC Bonus, and DV Bonus. HUD will evaluate project applications placed in Tier 2 for project eligibility, quality threshold requirements, and, if applicable, project renewal threshold requirements. HUD will determine funding using the CoC Application score and the CoC project ranking. Please refer to the NOFO for additional information.
3. *Projects Straddling Tiers.* If a project application straddles Tiers 1 and 2, HUD will conditionally select the project up to the amount of funding that falls within Tier 1. Using selection criteria for Tier 2, HUD may fund the remaining project costs.
4. *DV Bonus.* This NOFO provides approximately \$52 million for "rapid re-housing projects and supportive service projects providing coordinated entry, and for eligible activities that the Secretary determines to be critical in order to assist survivors of domestic violence, dating violence, sexual assault, or stalking." In this NOFO, Transitional Housing is an eligible activity determined critical to assist survivors of domestic violence, dating violence, sexual assault, or stalking.

Each CoC may only submit one new SSO-CE DV Bonus project; however, there is no limit to the number of TH projects and PH-RRH projects CoCs may apply for, provided each application is for at least \$50,000.

5. *Adjustments to Projects.* HUD may adjust the selection of competitive projects as follows:
  - a. *CoC Maximum Award and FMR Adjustments.* HUD must adjust awards for leasing, operating, and rental assistance budget line items based on changes to the Fair Market Rents. Please refer to the NOFO for additional information.
  - b. *Cost of Living Adjustment Factor.* HUD will adjust amounts for the supportive services and HMIS costs budget lines for renewing projects. Please refer to the NOFO for additional information.
6. *Geographic Diversity.* HUD has determined that geographic diversity is an appropriate consideration in selecting homeless assistance projects in the CoC Program Competition. HUD believes that geographic diversity can be achieved best by awarding grants to as many CoCs as possible. To this end, in instances where any of the 50 States, the District of Columbia, the Commonwealth of Puerto Rico, Guam, the Northern Mariana Islands, the Virgin Islands, and American Samoa do not have at least one funded CoC, HUD reserves the right to fund eligible project(s) with the highest total score in the CoC.
7. *Funding Diversity.* HUD reserves the right to reduce the amount of a grant, if necessary, to ensure that no more than 10 percent of assistance made available under this NOFO will be awarded for projects located within any one unit of general local government or within the geographic area covered by any one CoC.

#### **AWARD NOTICES**

HUD will email award notices to the authorized official representative from the SF-424. They will also notify unsuccessful applicants. See page 96 of the NOFO for additional information.

## SUBMISSION REQUIREMENTS AND DEADLINES

Applications must be submitted to HUD electronically in e-snaps. The applicant must be current with SAM.gov and UEI requirements before applying for CoC funding.

### DEADLINES

The HUD application deadline is 7 p.m. CST on January 28, 2026 for Normal Track Applications and February 25, 2026 for Extended Track Applications. Extended Track Applications are reserved only for new PH-PSH projects. The ND CoC did not receive any applications for new PH-PSH projects, therefore all project applications will be submitted to HUD by 7 p.m. CST on January 28, 2026.

CoCs are required to notify, in writing, all project applicants who submitted their project applications to the CoC by the deadline whether their application(s) will be accepted and ranked on the CoC Priority Listing, rejected, or reduced no later than 15 days before HUD's application submission deadline.

Please refer to the NOFO for additional information.

### SUBMISSION METHODS

All applications must be submitted in e-snaps for HUD.

All applications submitted to the ND CoC must be submitted through a secure link sent out to project applicants after the Intent to Apply is approved.

All applications will be thoroughly reviewed by the ND CoC Rating and Ranking Committee to ensure participant eligibility, eligible project activities, complete project narratives, consistent data, and required attachments correspond to the attachments list in e-snaps.

Project applications must include the populations and subpopulations they will serve, the type of housing and services they will provide, and the budget activities they are requesting. They must also provide documentation of applicant and subrecipient eligibility. All project applicants must ensure their organization has a Code of Conduct included on HUD's website.

**The ND CoC and HUD will not fund applications received after the respective deadlines.**

Applicants who experience technical difficulties should contact HUD at [CoCNOFO@hud.gov](mailto:CoCNOFO@hud.gov) for assistance immediately and document all attempts to obtain assistance.

The ND CoC and HUD strongly encourage all applicants to use the "Export to PDF" functionality in e-snaps to save a hard copy of all submission documents for their records.

Please refer to the NOFO for additional information.

# NORTH DAKOTA COC REALLOCATION POLICY

As approved by the ND CoC Membership in May 2025.

## I. Introduction

- A. The North Dakota Continuum of Care (ND CoC) has created this process to guide the ND CoC in determining if, when, and how the ND CoC should reallocate funds. Reallocating funds is one of the tools the ND CoC uses to strategically improve our homeless response system. Through reallocation, the ND CoC can create new, evidence-informed projects by eliminating projects that are underperforming, underutilized, or are more appropriately funded from other sources. While reallocation can be complicated and does not come without risk, it is necessary to ensure that our homeless response system meets the needs of people experiencing homelessness.
- B. Definition: Reallocation refers to the process by which the ND CoC shifts funds in whole or in part from one or more existing ND CoC-funded projects that are eligible for renewal to create one or more new projects. A reallocated project must be a new project serving new participants or an expansion project serving additional clients.
- C. The annual U.S. Housing and Urban Development (HUD) CoC Program Competition Notice of Funding Opportunity (NOFO) dictates the types of projects that may be created through reallocation in each competition. If an existing funded agency is looking to reallocate its funds, the agency reallocating funds must include a component change (i.e., TH to PSH or RRH to PSH) or a significant change in the program's population (i.e., youth to single chronically homeless).

## II. Identifying Projects for Reallocation

- A. The ND CoC Board, Rating and Ranking Committee, and CoC staff all assist in identifying projects that may be considered for reallocation. Projects may also relinquish all or a portion of their renewal funding for reallocation on the Intent to Apply form during the CoC competition.
- B. Various factors will be considered for identifying projects for reallocation, including:
  1. Regional need. Existing inventory, system gaps, duplication, over-abundance of a project type, population/sub-population served.
  2. Program performance (e.g., utilization rate, data quality, outcome performance, service model, coordination with other services, coordinated entry participation, etc.). If applicable, the ND CoC will first attempt to provide technical assistance to underperforming projects through a Performance Improvement Plan. If agencies neglect to follow through with the identified plan or show performance improvement after one year, they may be at risk of reallocation.
  3. Fiscal Management. Spending down of grant funds, audits, fiscal practices, financial reports, cost-effectiveness, and matching funds.
  4. Other system needs. Coordinated entry and HMIS funding needs, potential grant mergers/collaborations, and other funding resources or restrictions (both new and existing).
- C. Underperforming, underutilized, financial mismanagement, or low-need projects may be targeted for reallocation at any time, but are most likely identified following an annual performance review or during the ND CoC competition process. However, when appropriate, the ND CoC is dedicated to working with any underperforming or underutilized project to address deficiencies before recommending reallocation. The ND CoC feels it is worth the investment to increase the capacity of existing projects and agencies to meet the needs of our state.

### **III. Reallocation Process**

If a targeted project is not interested in or has not been responsive to an ND CoC Project Improvement Plan, the project's funding may be reallocated. The ND CoC will contact the project in person and in writing, notifying the project of the reason for consideration and helping develop a transition plan. The transition plan will be designed to help ensure compliance with other funding commitments and prevent anyone from becoming homeless because of the reallocation.

# NORTH DAKOTA COC RANKING AND REVIEW POLICY

As approved by the ND CoC Membership in May 2025.

## I. Introduction

- A. The North Dakota Continuum of Care (ND CoC) requires an annual project review for all U.S. Housing and Urban Development (HUD) Continuum of Care (CoC) and Emergency Solutions Grant (ESG) projects. This policy applies explicitly to projects seeking funding under the annual HUD CoC competition.
- B. These conditions are designed to inform performance evaluation and Notice of Funding Opportunity (NOFO) Rating and Ranking Committee deliberations and provide all new and renewal applicants with clarity regarding how ranking and prioritization occur.

## II. Roles and Responsibilities, ND CoC Rating and Ranking Committee

On behalf of the ND CoC Board of Directors, the ND CoC Rating and Ranking Committee oversees the rank and review process. As stated in the ND CoC Governance Charter, the committee is responsible for:

- A. Updating ND CoC policies for the annual HUD CoC Competition and presenting them to the CoC Board and CoC Membership for approval;
- B. Conducting an annual review of all projects applying for the HUD CoC Competition using established criteria;
- C. Ranking projects according to criteria, placing them in a recommended funding order by tier, and presenting ranking recommendations to the CoC Board and CoC Membership for approval; and
- D. Conducting meetings for policy review and during the local CoC competition as needed.

## III. Important Project Application Dates and Deadlines

The ND CoC publishes annual HUD and local CoC competition deadlines. The dates and deadlines will be published on the ND CoC website and emailed through the ND CoC membership email list. Projects that do not submit their project application packet by the ND CoC deadline will not be eligible to be ranked. In the event of a natural disaster or other extenuating circumstances, an agency may request a reasonable extension to the ND CoC coordinator, and the Rating and Ranking Committee must approve the request.

## IV. Eligibility

To be eligible for inclusion in the ND CoC Rating and Ranking process, all projects must pass all facets of the ND CoC application process, including:

- A. HUD Threshold Requirements, including, but not necessarily limited to (*please go to the HUD competition page for a complete list of HUD Threshold requirements*):
  1. Applicant has a Unique Entity Identifier (UEI) number and has a current SAM registration.
  2. The project draws down funds from eLOCCS at least quarterly (this is only applicable to currently federally funded agencies).
  3. Project applicants and potential subrecipients must meet the eligibility requirements of the CoC program as described in the Act and the Rule (nonprofit organization, state or local government, instrument of state or local government, public housing agency, or Indian Tribe or Tribally Designated Housing Entity) and provide evidence of eligibility required in the application (e.g., nonprofit documentation).

4. Project applicants and subrecipients must demonstrate the financial and management capacity and experience to carry out the project as detailed in the application and the capacity to administer federal funds.
5. Project applicants must submit the required certifications outlined in the NOFO.
6. The population to be served must meet program eligibility requirements described in the Act, the Rule, and the NOFO.
7. Project applicants must agree to participate in the local HMIS system. Victim Service Providers (VSP) must use a CoC-approved comparable database.
8. Project applicants agree to meet the criteria set forth by HUD for project quality thresholds for their specified project. The criteria are available in the NOFO.

B. CoC Eligibility and Threshold Requirements

1. The project agrees to incorporate Housing First principles, including low-barrier access, into agency policies and practices. The agency may be required to submit policies during the local competition.
2. The applicant agrees to comply with Fair Housing, Equal Opportunity, and Equal Access, including ensuring adaptations to marketing, access, interpretation, and reasonable accommodations.
3. The project will incorporate CoC housing stability best practices to assist households in achieving and maintaining independent living adapted to their individual needs and goals.
4. The applicant agrees to invite program participants (persons with lived experience) to participate in their board of directors, regional/local coalitions, consumer advisory boards, and any other opportunity for persons with lived experience to provide input on ND CoC or project improvement.
5. The project has a signed CoC Membership Agreement.
6. The project agrees to participate in local and regional planning, including attending ND CoC and local homeless committee/coalition meetings.
7. The project agrees to fill all beds using the CARES prioritization process, tools, and policies (PH, including PSH and RRH, or Joint projects ONLY).
8. The project agrees to link households to mainstream services.
9. Project agrees to verify recipient eligibility and maintain documentation of eligibility.
10. Project history or assurance (if a new applicant) to maintain current and clean data and promptly respond to quality and compliance issues.
11. History (renewal projects only) or agreement (new projects only) to provide timely documentation and reports.
12. Ability to achieve ND CoC utilization and performance standards or, if not achieved, identify a performance improvement plan approved by the ND CoC.
13. The project agrees to participate in all CoC-required training, including, but not limited to, monthly training sessions, EdApp learning management system training, and HMIS in-person training.
14. Applicant agrees to participate in an annual performance evaluation and follow up with any technical assistance requirements if the project has been identified as underperforming.
15. The project agrees to follow ND CoC Policies and Written Standards.

C. Project adheres to all local ND CoC competition deadlines.

1. The project submits an Intent to Apply and Threshold Assessment by the deadline.
  2. Initial and final Project Application submitted in e-snaps and via PDF by the deadline.
- D. Provide Annual Performance Reports to the ND CoC with the project application (renewal projects ONLY).

**V. Guidance on Required Ranking and Tiers**

- A. The ND CoC Rating and Ranking Committee will review all projects and rank them in either Tier 1 or Tier 2 according to ND CoC ranking criteria, including, but not limited to: Housing First, equity, CoC participation, project design, project performance, data quality, and coordinated entry. Tier 1 projects are more likely to be renewed by HUD. Tier 2 projects are conditional and will depend on HUD's CoC competition score, project score, and rank. HUD will award a point value to projects in Tier 2. Projects may straddle Tier 1 and Tier 2, but the portion in Tier 1 must adequately fund the project if funding in Tier 2 is not awarded.
- B. New or Expanded Project Ranking Priority Bonus: The ND CoC will award bonus points to projects based on project type to help prioritize new or expanded project applications that fill the gaps and needs within the ND CoC. New or expanded projects will receive bonus points based on the priority of HUD and the ND CoC for the current NOFO.

**VI. Scoring and Ranking Process: HMIS Projects**

The ND CoC recognizes that a quality HMIS is not only required by HUD but is also used as a valuable tool to operate and evaluate our regional homeless response system. However, ranking and scoring HMIS like Supportive Housing Projects is not feasible due to the unique aspects of our statewide system. Therefore, the ND CoC will rely on the ND CoC Data Committee to evaluate our HMIS system administrator's performance annually and provide the ND CoC with a letter of review and recommendation for renewed funding or reallocation. Furthermore, the ND CoC recognizes that a robust HMIS needs sufficient funding and, therefore, will strive to renew or reallocate funding for our system by placing one or more HMIS applications for a minimum of 2.5 percent of the CoC's Annual Renewal Demand (ARD) at the top of Tier 1 if the request comes from the designated state system administrator. Requests for over the ARD or 2.5 percent, whichever is greater, may be placed in Tier 2.

**VII. Scoring and Ranking Process: Supportive Housing and Supportive Services Only Projects**

- A. The following describes the ND CoC process to score and rank supportive housing projects for CoC funding. It should be noted that the ND CoC uses "scoring," "reallocation," and "ranking" as three distinct steps. Scoring informs, but does not dictate, the final ranking decisions. The ND CoC Rating and Ranking Committee may recommend adjustments where ranking and scoring do not correlate. The committee will indicate in comments why the project is ranked in its position versus directly following the scoring.
- B. Scoring criteria: The ND CoC Rating and Ranking Committee or other designated committee is responsible for reviewing, updating, and distributing ranking criteria to the ND CoC Board and Membership for approval each year. The process utilizes non-biased, objective criteria based on the HUD ranking tool, established ND CoC priorities, and project performance. The ND CoC uses the e-SNAPS project application, project threshold assessment, an ND CoC ranking scorecard, and required attachments. The Rating and Ranking Committee will score each project using the ranking scorecard to rate and rank each project application.
- C. Specifically, ranking incorporates the following categories:
1. Housing First
  2. Equity
  3. Client participation in project design
  4. CoC participation

5. Project design
6. Spending history, annual performance report, and monitoring
7. HMIS/data quality
8. Coordinated entry participation
9. Performance/evaluation

#### D. Scoring & Ranking Process

1. The ND CoC solicits interest for the Rating and Ranking Committee through the annual membership drive. No representatives from applicant agencies (staff, clients, or board members) are accepted.
2. Intent to Apply: The ND CoC solicits Intent to Apply and project threshold assessments to renewal applicants and an open invitation for new projects via the ND CoC email list and notice at other regional meetings or public notices.
3. The ND CoC coordinator follows up with agencies interested in applying for new or expanded projects.
4. Within ten days after the NOFO publication, application packets are posted on the ND CoC website.
5. The ranking process, criteria, submitted Intent to Apply, and timelines are presented at the first ND CoC meeting after the NOFO release. Any proposed updates to the policy in response to the NOFO are presented and voted upon at this time.
6. The ND CoC promotes and hosts, at a minimum, two application labs to assist with completing the application in e-snaps.
7. Submission: To be eligible for ranking, project applicants must submit their application packet (project application and required supporting documentation) to the ND CoC by the deadline in PDF format.
8. Review and Ranking
  - a. The ND CoC coordinator collects and organizes the application ranking materials and shares them with the Rating and Ranking Committee.
  - b. The committee reviews the application packet (project application and required supporting documentation) and scores each application. This includes:
    - Reviewing project eligibility.
    - Identifying specific concerns or noting questions for the applicant.
    - Assigning a preliminary score and rank to each project.
  - c. The Rating and Ranking Committee meets to collectively review and align scores and rankings. Each project is assigned a score based on the percent of eligible points and any adjustments (note adjustments may be made for extenuating circumstances like a change in agency leadership, disaster, etc.).
  - d. The ND CoC coordinator notifies applicants of the inclusion/exclusion in the ND CoC Collaborative Application that will be submitted to HUD.
  - e. Projects are given up to seven days (dependent on HUD's deadlines) to appeal the committee's recommendation to exclude their application from the ND CoC Collaborative Application that will be submitted to HUD.
  - f. If received, appeals are reviewed by the Rating and Ranking Committee. Scores may be adjusted if validated (supporting documentation or appropriate clarification is

provided). The Rating and Ranking Committee will meet to deliberate score adjustments if needed.

- g. The committee will recommend one to three ranking scenarios to the ND CoC Board based on project score, ND CoC priorities, and eligible funding. When ties exist, the committee shall rank the following preferences:
  - The project with the highest housing stability and the fewest returns to homelessness shall be ranked first.
  - Projects with existing clients shall also be ranked higher if scores are identical or within one point.
9. Vote on Rank
  - a. The ND CoC Rating and Ranking Committee presents final applicant scores and the board-approved ranking scenario to the ND CoC Membership. Although rare, members may reject the proposed options and identify another desired option. The membership votes on the proposed rank and tier.
  - b. Projects are notified of final rank, tier, and inclusion/exclusion in the collaborative application. Projects not accepted or ranked in Tier 2 are also again notified of their ability to appeal to HUD.
10. Public Posting: The approved priority listing will be placed on the ND CoC website and mailed to the ND CoC email list, which includes project applicants.