



# FY2025 CoC Program Competition Application Information

The information below was initially provided as an overview of the FY2025 CoC Program NOFO that was issued by HUD on November 13, 2025. It has been updated to reflect the changes included in the FY2025 CoC Program NOFO that was re-issued on December 19, 2025 for public review. Changes have been made in blue for easy distinction.

**Opportunity Name and Number:** FY 2025 Continuum of Care Competition and Youth Homeless Demonstration Program Grants NOFO (FR-6901-N-25)

- The re-issued NOFO has been made available for public review. Due to a preliminary injunction, it cannot be implemented or enforced until further court order.
- For more information: <https://www.hud.gov/hud-partners/community-coc>
- On Grants.gov: <https://www.grants.gov/search-results-detail/361047>

**Application Deadline:** This NOFO establishes a new funding process with two deadlines for submitting applications.

- Normal Track: January 28, 2026 at 8:00pm EST
- Extended Track: February 25, 2026 at 8:00pm EST

## MOST SIGNIFICANT CHANGES

The list below describes the most significant changes between the FY2025 CoC Program NOFO issued on November 13, 2025 and the one re-issued on December 19, 2025 for public review.

1. **Two-Track Application Process.** HUD is creating two separate tracks for application submission with different deadlines and other requirements. The Normal Track CoC Priority Listing must include all project applications for new and renewal projects except for new permanent housing projects. New permanent housing projects will be ranked on a separate priority listing and submitted as part of the Extended Track.
2. **Only 30 percent of a CoC's funding ranked on the Normal Track CoC Priority Listing is protected in Tier 1, down from 90 percent in past years.** This is the most significant structural change in a decade. With 70 percent of CoC's Annual Renewal Demand now fully competitive and tied to Merit Review scores and project ranking, even small scoring differences could lead to major funding losses. Due to the two-track process, only \$2.655 billion is available for the Normal Track.
3. **Permanent Housing (PSH, RRH, Joint TH-RRH) renewal projects capped at 30 percent of Annual Renewal Demand.** CoCs must shift funding from existing permanent housing projects that exceed this cap toward new projects that are aligned with the administration's priorities, particularly transitional housing with high service requirements. New Joint TH-RRH projects are no longer eligible. New Permanent Supportive Housing (PH-PSH) or new Rapid Re-housing (PH-RRH) must be submitted as part of the Extended Track and are not subject to the cap.

4. **All projects except for CoC Planning/UFA must compete.** All renewal projects and new transitional housing (TH), new Homeless Management Information System (HMIS), and new Supportive Services Only (SSO) must be ranked on the Normal Track CoC Priority Listing with no special protection, increasing competition across the entire portfolio. New and renewal YHDP projects will no longer be awarded non-competitively and both YHDP and new and renewal DV bonus projects must be ranked. New PH-PSH and new PH-RRH projects must also be ranked, however, these are ranked separately on the Extended Track CoC Priority Listing and will be awarded competitively up to the set-aside amount.
5. **Project review factors and requirements can disqualify any project.** There are various ways through this NOFO in which organizations applying for funding will be reviewed for the extent in which they engage in racial preferences or the operation of safe consumption sites. The language in the re-issued NOFO for public review modified language from the NOFO issued on November 13th to remove direct references to conducting activities that rely on a definition of sex other than binary in humans. However, the NOFO still makes reference to Executive Order 14332—which includes this as a consideration for awarding funds— under post-award requirements. These provisions continue to create significant risks for project applications and for compliance post-award.
6. **New priorities focused on required service participation, “public safety,” and increasing national competition.** There are various ways through this NOFO in which CoCs and project applicants will be reviewed and rated based on the extent to which program participants are required to participate in supportive services; can demonstrate collaboration with law enforcement; and are promoting economic self-sufficiency (measured by employment over reliance on government assistance). The Merit Review Score includes many significant shifts which will play a significant role in what projects are awarded.
7. **Updated Timeliness Standards for Application Submission.** This NOFO no longer requires that project applications be submitted to the CoC 30 days before the application submission deadline. The requirement now (on page 107) is only that applications be submitted to the CoC any time before HUD’s application submission deadline. However, CoCs are still required to notify project applicants, outside of e-snaps, no later than 15 days prior to HUD’s application submission deadline.

## FUNDING OVERVIEW

**\$3.918 billion is available.** In addition to the \$3.54 billion available through the full year Continuing Resolution, HUD repurposed \$100 million originally designated for development of new permanent supportive housing (with Congressional approval) and \$294 million of Section 231 funds (recaptured funding).

- This increased amount may be enough to cover the national renewal demand which will now be calculated using the FY2026 Fair Market Rent rates.
- Everything except CoC Planning (or UFA costs) is competitive and must be ranked, including Youth Homelessness Demonstration Program renewals.
- Projects originally awarded under the Special NOFO on Unsheltered and Rural Homelessness that will expire in 2026 are eligible to apply for renewal.
- At least \$52 million must be used for new DV Bonus projects, which now may include transitional housing as an eligible project type.
- \$1,262,400 in funding is set aside for new Permanent Housing projects for individuals and families with a disability.

## FUNDING PROCESS

CoCs must continue to rank projects in two tiers:

- Tier 1 is set at 30% of CoC's Annual Renewal Demand (ARD) (in comparison to 90% in FY2024). Projects ranked in Tier 1 are only required to meet the project quality and project threshold requirements. They are not subject to the CoC score.
- Tier 2 is the difference between Tier 1 and the sum of each CoC's ARD, CoC Bonus, and DV Bonus. Projects ranked in Tier 2 and pass project quality and project threshold requirements are competitively awarded based on a Tier 2 project score that is based on the CoC Merit Score, how the project is ranked, and the extent in which the project has or will incorporate service participation requirements into program design.

The re-issued NOFO makes significant changes to the funding process. There are now **two** tracks:

### **Normal Track: \$2,655,600,000 available**

The Normal Track CoC Priority Listing may include all renewal applications as well as new project applications for Transitional Housing (TH), any Supportive Services Only (SSO), and Homeless Management Information System (HMIS). It must not include any new project applications for new PH-PSH or new PH-RRH projects. See more below.

HUD may award projects ranked in Tier 1 of the Normal Track CoC Priority Listing prior to the rest of the awards.

No more than 30 percent of a CoC's Annual Renewal Demand (ARD) can be used to fund **renewal** Permanent Housing projects, including PH-PSH, PH-RRH, and Joint TH and PH-RRH projects, forcing CoCs to reallocate the majority of their **existing permanent housing** programming to **new projects, including new PH-PSH and new PH-RRH.**

Joint Component TH-RRH renewal projects continue to be eligible for renewal funding but are not allowable as a new project type.

### **Extended Track: \$1,262,400,000 available**

Through this NOFO, HUD intends to create a set-aside of funds for new permanent housing projects for homeless individuals and families with disabilities, including PH-PSH and PH-RRH.

**All** applications for new PH-PSH and PH-RRH including CoC Bonus, DV Bonus, and expansion projects must be ranked on a separate Extended Track priority listing (due on February 25, 2025). These projects necessarily are part of Tier 2, though ranked separately from Tier 2 projects included on the Normal Track CoC Priority Listing.

Please note: the NOFO does not specify new YHDP replacement PH-PSH or PH-RRH and the Alliance cannot speculate HUD's intention here.

The NOFO does indicate that new PH projects may be transition grants. However, please remember that a transition grant is one that is created through reallocation to transition an eligible CoC renewal project **from one program component to another eligible component.**

- A PH-PSH project that reallocates to a new PH-RRH under the extended track could be a transition grant (if it meets all other requirements listed on pg. 52 and 53 of the NOFO).
- A PH-PSH project that wishes to reallocate to a new PH-PSH project could not be counted as a transition grant because it is not a change in component.

CoCs must ensure that the amount requested on the Extended Track Priority Listing when combined with the Normal Track Priority Listing does not exceed the CoC's maximum award amount.

## **UPDATED FY2025 POLICY PRIORITIES**

1. **Improving Outcomes.** HUD wants CoCs to review all eligible projects to determine their effectiveness in reducing homelessness and prioritize those that promote self-sufficiency, increase employment income over government assistance, and promote treatment and recovery.

2. **Restoring Balance to the Continuum of Care.** This new policy priority focuses on HUD's intention to expand opportunities for other component types, particularly TH and SSO projects.
3. **Prioritizing Treatment and Recovery as a Means to Self-Sufficiency.** HUD wants CoCs to prioritize projects that provide treatment and services needed to recover and regain self-sufficiency, including on-site treatment and participation requirements in services.
4. **Promoting Economic Self-Sufficiency.** HUD wants CoCs to 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. This priority is updated to also discuss HUD's view on how supportive service participation requirements advance both recovery and self-sufficiency and encourages the use of supportive service agreements.
5. **Creating Competition to Improve Innovation and Accountability.** This new policy priority focused on the need to increase competition and highlights the change in Tiers as the mechanism for doing this.
6. **Ending the Crisis of Homelessness on Our Streets.** HUD wants CoCs to direct resources towards outreach, intervention, and assistance that helps people move out of unsheltered homelessness and regain self-sufficiency.
7. **Advancing Public Safety for All.** HUD wants CoCs to 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. Highlights Executive Order 14321 as reflecting the need for this type of cooperation.
8. **Minimizing Trauma for Vulnerable Populations.** HUD wants CoCs to encourage the use of trauma informed care, ensure safety of program participants, and access to 'safe, single-sex spaces' for women.
9. **Expanding Access Based on Merit, not Ideology.** This new policy priority highlights HUD's intention to ensure that faith-based organizations can participate in the CoC Program and operate consistently with their religious beliefs.

## NEW/UPDATED PROJECT APPLICANT CERTIFICATIONS AND EXPECTATIONS (FROM FY2024/2025 NOFO TO FY2025 REISSUED NOFO)

- Updated **HUD Applicant and Recipient Assurances and Certifications (HUD-424B)** that includes a certification that the applicant will not use federal funding to promote diversity, equity, and inclusion mandates, policies, programs, or activities that violate any applicable federal anti-discrimination laws.
- New **Certification of Need and Compliance with Housing Quality and Habitability Standards** in which the Collaborative Applicant must certify a demonstrated need for all PH projects included in the Renewal Project Listing and that they all comply with program requirements, including HQS or Habitability Standards (whichever is applicable).
- New **Certification for Opportunity Zone Preference Points** if the CoC is requesting up to 4 Opportunity Zone preference points.

## RURAL COSTS FOR PROJECTS ORIGINALLY AWARDED UNDER THE RURAL SET ASIDE OF THE SPECIAL COC

Projects originally awarded under the Rural Set Aside through the Special CoC NOFO are permitted to continue to use funding for purposes allowable through that set aside, including: rent and utility arrears, repairs to make housing habitable, capacity building activities, emergency food and clothing assistance, and costs associated with making use of Federal Inventory property programs.

The costs permitted for rural areas generally (per Section 5707 of the James M. Inhofe National Defense Authorization Act for Fiscal Year 2023 (PL 117-263, December 23, 2022, 136 Stat 2395) amended section 423(a) of the McKinney-Vento Homeless Assistance Act) are not applicable for these projects.

## NEW PROJECTS CREATED WITH COC BONUS OR THROUGH COC REALLOCATION

CoCs may apply for any of the following project types through the CoC Bonus or CoC Reallocation Process:

- Supportive Services Only (SSO)
- Transitional Housing (TH)
- Permanent Supportive Housing (PSH)
- Rapid Rehousing (RRH)
- Dedicated HMIS
- SSO-Coordinated Entry

Transition grants, which allow an eligible CoC renewal project to **transition from one program component to another eligible component** over a 1-year period, are permitted this year. If awarded a transition grant, the operating start date of the new grant would be the day after the end of the expiring grant term, similar to a renewal grant. **It is important to note:** The applicant for the transition grant must be the same as the recipient on the current grant agreement for the project being eliminated. If a new applicant were needed for the project, it would simply be a new project and would not qualify as a transition grant.

## PROJECT REVIEW

Standard project quality and project threshold criteria apply for new and renewal projects with some key additions:

### Project Threshold Review

- Project applicants will be required to affirm that they will (1) not engage in racial preferences or other forms of illegal discrimination and (2) will not operate illegal drug injection or safe consumption sites. HUD may also reduce or reject applications in which there is evidence that the project engages in these activities.
- In the re-issued FY2025 CoC Program NOFO for public review, HUD has removed language under project renewal threshold that was associated with activities that rely on or otherwise use “a definition of sex other than as binary in humans.” Note, though references to this language are removed throughout, Section VII continues to incorporate Executive Order 14332, where it can still be found.

### Project Quality Threshold

- New projects will be rated using project quality criteria that will assess factors such as the reasonableness of costs and the leveraging of mainstream programs like Medicaid and SSI as well as

the following:

- New Transitional Housing projects will be required to provide 40 hours of customized services per program participant (except for participants over 62 or with a physical disability/impairment or developmental disability).
- New Supportive Services Only (SSO) projects for street outreach will be required to demonstrate that the project applicant has a history of partnering with first responders and law enforcement and will cooperate with the enforcement of local laws such as public camping and public drug use.
- New Permanent Supportive Housing projects must require participation in supportive services demonstrated by providing direct language from a supportive service agreement and be designed to homeless individuals or families with a disability, including disabled elderly individuals and/or individuals with a physical disability/impairment. In the re-issued FY2025 CoC Program NOFO for public review, HUD no longer excludes any disability type, including substance use disorder.
- New Rapid Rehousing projects must serve homeless individuals or families with any disability type and require participation in supportive services, demonstrated by providing direct language from a supportive service agreement. These projects will also still be rated on the extent in which the project applicant has previously operated a project with higher-than-average outcomes on increasing employment income and the services offered will ensure the participant is able to successfully obtain self-sufficiency.

## MERIT REVIEW

Merit Review (previously CoC Scoring Criteria) removes or significantly adjusts previous criteria and adds new criteria, with a total of 130 points available across 3 rating areas: Project Capacity, Review, and Ranking; System Performance; and CoC Coordination and Engagement. In addition, there are 19 bonus points available (15 for CoC Mergers and up to 14 for Policy Initiative Preference Points). **Note:** While the chart on page 74 still indicates 4 points for Policy Initiative Preference Points, Section V.B.2 has been updated to allow for up to 14 points.

The Merit Review criteria is relatively unchanged in the FY2025 CoC Program NOFO re-issued on December 19th for public review from the now withdrawn FY2025 CoC Program NOFO that was issued on November 13th. See here for an updated side-by-side comparison with the FY2024/FY2025 CoC Program NOFO .

Changes in the December 19th version:

- Under section C. CoC Coordination and Engagement there are two key changes:
  - The language under (10) Street Outreach has been updated from “Street Outreach projects partner with first responders and law enforcement to increase housing and service engagement” to Street Outreach projects cooperate with first responders and law enforcement to increase positive interaction in order to increase housing and service engagement and promote use of CoC services.”
  - The language under (13) Protecting Public Safety no longer requires CoCs to cite and demonstrate enforcement of specific law(s) that cover the full geographic area related to a prohibition on public illegal drug use and public camping or loitering. Instead, the criteria now requires CoCs to conduct an assessment of their geographic area to determine “the effect of the location on success in attaining the program goals”. To do this, CoCs must demonstrate “by providing evidence” that the CoC’s entire geographic area:
    - Quickly clears tents and encampments on public property and connects individuals who are camping in public with appropriate services. In your response, describe how the CoC cooperates with law enforcement to achieve this and the current status of tents and encampments in the geographic area.

- Does not tolerate the public use of illicit drugs and quickly connects individuals who are using illicit drug in public with appropriate services and/or law enforcement. In your response, describe how the CoC cooperates with law enforcement to achieve this and the current status of overdoses and illicit drug use in public spaces in the geographic area.
- Under the Policy Initiative Preference Points, there are now 14 points available (up from 4) and the initiatives have changed. While the first initiative is still tied to Opportunity Zones and up to 4 points, the second initiative is now tied to prohibiting “illicit drug enablement” for up to 10 points. For this new initiative, CoCs may receive points if they indicate that there are no projects submitted by the CoC that will operate safe consumption sites or conduct activities under the pretext of “harm reduction.” HUD removed the policy initiative that was focused on the verification of immigration status by nonprofit organizations.

## RISK REVIEW

HUD’s review of applications has always included an assessment of risk and past performance. In FY2025, this “Risk Review” incorporates the same criteria as in years past (i.e., financial controls, effective management systems, results of audits). The criteria re-issued on December 19th for public review includes the following changes from the FY2024/FY2025 CoC Program NOFO:

- Existence of other public sources, such as newspapers, Inspector General or Government Accountability Office reports or findings, or other complaints that have been proven to have merit
- History of subsidizing or facilitating activities that impede law enforcement related to vagrancy, drug use, or other illicit activities that conflict with the purposes of this NOFO
- Added to “History of performance” HUD has included that it “will not penalize a renewal applicant who sufficiently complied with the terms and conditions FY2024 NOFO that are in direct conflict with those contained herein.”

**Note:** HUD has removed the criteria from the now withdrawn CoC Program NOFO issued on November 13th related to having a “history of subsidizing or facilitating activities that conflict with the purposes of this NOFO.”

## SELECTION PROCESS

HUD makes a point of stating that it may, to the extent allowed by law:

- Fund applications in whole or in part.
- Fund applications at a lower amount than requested.
- Choose to fund no applications under this NOFO.
- Adjust funding for an application, to ensure funding or geographic dispersion, and alignment with program or administrative priorities.
- Withdraw an award offer and make an offer of funding to another eligible application, if terms and conditions are not finalized or met.
- Use additional funds made available after NOFO publication to either fully fund an application or fund additional applications.
- Correct HUD review and selection errors. If HUD commits an error that causes an applicant not to be selected, HUD may make an award to that applicant when and if funding is available.
- Release another NOFO, if funding is available and if HUD does not receive applications of merit.

Different from the FY2024/FY2025 NOFO, only CoC Planning (or UFA Cost applications, if applicable) will be conditionally awarded non-competitively. All other project types must be ranked by the CoC. HUD will then select as follows:

- HUD will select Normal Track projects in the following order up to the amount of \$2,655,600,000:
  - All Tier 1 projects that pass project quality and project eligibility thresholds.
  - Then HUD will select projects that meet project quality and project eligibility thresholds in Tier 2 in the order of project score. Any permanent housing renewal projects that exceed the 30% ARD cap for the CoC will be removed from the Normal Track CoC Project Listing and Tier 2 project scores will be adjusted accordingly.
  - Each new (except new PH-PSH and new PH-RRH) and renewal project ranked in Tier 2 (including YHDP renewal and DV Bonus) of the Normal Track CoC Project Listing will receive a point value up to 100 points:
    - Up to 50 points in direct proportion to the Merit Review Score
    - Up to 40 points for the CoC's ranking of the project (the higher the ranking in Tier 2, the more points assigned)
    - Up to 10 points for projects that have or will incorporate service participation requirements evidenced in an occupancy agreement (or equivalent document)
- HUD will select new PH-PSH and new PH-RRH ranked on the Extended Track CoC Priority Listing in order of project score using the 100-point scale in Tier 2 that is described above up to an amount of \$1,262,400,000.
- If the \$52 million minimum for DV Bonus has not been reached after making Tier 2 project selections, HUD will continue down the list to fund additional DV Bonus projects by project-level score until at least \$52 million has been selected.

## POST AWARD INFORMATION

### Awarded projects will be required to comply with the following new provisions:

- Compliance with Immigration Requirements (8 U.S.C. 1601-1646; Executive Order 14218)
- Equal Participation of Faith-based Organizations in HUD Programs and Activities consistent with 42 U.S.C. 2000bb et seq.; 42 U.S.C. 2000d et seq.; 24 CFR 5.109; and Executive Orders 14202, Eradicating Anti-Christian Bias and EO 14205, Establishment of the White House Faith Office.
- Environmental requirements that apply in accordance with 24 CFR part 50 or part 58
- Unless prohibited by law and to the extent permitted under the Freedom of Information Act (FOIA), your application and post-award content may be released to the public in response to FOIA requests, except to the extent that certain information may be withheld under a FOIA exemption (5 USC § 552(b); 24 CFR 15.107(b)). HUD may also share your information within HUD or with other Federal agencies if HUD determines that sharing is relevant to the respective program's objectives.
- Waste, Fraud, Abuse, and Whistleblower Protections. 41 USC § 4712, which includes informing your employees in writing of their rights and remedies, in the predominant native language of the workforce. Under 41 U.S.C. § 4712, employees of a contractor, subcontractor, grantee, subgrantee, and personal services contractor may not be discharged, demoted, or otherwise discriminated against as a reprisal for disclosing information that the employee reasonably believes is evidence of gross mismanagement of a Federal contract or grant, a gross waste of Federal funds, an abuse of authority relating to a Federal contract or grant, a substantial and specific danger to public health or safety, or a violation of law, rule, or regulation related to a Federal contract (including the competition for or negotiation of a contract) or grant. (See Federal Contractor or Grantee Protections | Office of Inspector General, Department of Housing and Urban Development ([hudoig.gov](https://www.hudoig.gov)))

- Presidential Executive Actions affecting federal financial assistance programs, as advised by the Department, unless otherwise restricted by law: Executive Order (EO) 14219 (Ensuring Lawful Governance and Implementing the President’s “Department of Government Efficiency” Deregulatory Initiative); 14218 (Ending Taxpayer Subsidization of Open Borders); guidance resulting from the White House Task Force established by 14202 (Eradicating Anti-Christian Bias) and the Senior Advisor to the White House Faith Office assigned by 14205 (Establishment of the White House Faith Office); 14182 (Enforcing the Hyde Amendment); 14173 (Ending Illegal Discrimination and Restoring Merit-Based Opportunity); 14168 (Defending Women From Gender Ideology Extremism and Restoring Biological Truth to the Federal Government); 14151 (Ending Radical and Wasteful Government DEI Programs and Preferencing); and 14148 (Initial Rescissions of Harmful Executive Orders and Actions)

**In addition, awards made under this NOFO:**

- Will not be used to conduct activities that subsidize or facilitate racial preferences or other forms of illegal discrimination, including activities where race or intentional proxies for race will be used as a selection criterion for employment or program participation. Please note, the language that was included in the now withdrawn CoC Program NOFO issued on November 13th referred to “activities that rely on or otherwise use a definition of sex as other than binary in humans” was removed, however, the reference to Executive Order 14332, which incorporates this activity, is still included in the re-issued NOFO.
- (New in the re-issued NOFO) Will not be distributed in a way that violates or otherwise is used to interfere with constitutional protections guaranteed for speech and religious beliefs and the free exercise of religion.
- Will not be used to fund, promote, encourage, subsidize or facilitate the use of illicit drugs.
- Will not be used to fund any project, service provider, or organization that operates drug injection sites or “safe consumption sites.” The reissued NOFO has removed the language that previously said “knowingly distributes drug paraphernalia on or off of property under their control, permits the use or distribution of illicit drugs on property under their control, or conducts any of these activities under the pretext of “harm reduction.”
- (New in the re-issued NOFO) If any part or provision of the grant Agreement or terms of this Notice are enjoined or held to be void or unenforceable in any jurisdiction, they shall be ineffective as to such jurisdiction and only to the extent of such prohibition or enjoinder and shall not invalidate or affect the legality or enforceability of the remaining provisions and applications of the Agreement and Notice. In the event the enjoinder of such provisions is stayed, dissolved or reversed, the full terms of the grant agreement and Notice, including such provisions, will automatically become effective. This clause is self-executing and will become effective, binding, and enforceable automatically upon issuance of this Notice.

**HUD has removed the following items which were included in the FY2024/FY2025 NOFO from the list of requirements:**

- Compliance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d-2000d-4) (Nondiscrimination in Federally Assisted Programs) and implementing regulations at 24 CFR part
- Compliance with the Age Discrimination Act of 1975 (42 U.S.C. 6101-6107) and implementing regulations at 24 CFR part 146
- Compliance with Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794) and implementing regulations at 24 CFR part 8
- Compliance with the Americans with Disabilities Act, 42 U.S.C. 12101 et seq
- Compliance with Improving Access to Services for Persons with Limited English Proficiency (LEP) requirements, including those listed within Federal Register Notice, FR-4878-N-02 (also see HUD’s webpage)
- Compliance with Equal Access Requirements (e.g., 24 CFR 5.105(a)(2) and 5.106)
- Compliance with Energy Efficient and Sustainable by Design

- Compliance with Eminent Domain
- Compliance with System for Award Management and Universal Identifier Requirements at 2 CFR part 25
- Compliance with section 106(g) of the Trafficking Victims Protection Act of 2000 (TVPA), as amended (22 U.S.C. 7104(g)) and implementing regulations at 2 CFR part 175 (Award Term for Trafficking in Persons)
- Compliance with Award Term and Condition for Recipient Integrity and Performance Matters (see Appendix XII to 2 CFR part 200)
- Compliance with Suspension and Debarment regulations (2 CFR part 2424 and 2 CFR part 180)
- Compliance with environmental justice requirements that apply in accordance with Executive Orders 12898 and 14008, and OMB Memorandum M-21-28, which implements the Justice40 Initiative, section 223 of Executive Order 14008
- Compliance with HUD Secretary Fudge's April 12, 2022 memorandum "Eliminating Barriers That May Unnecessarily Prevent Individuals with Criminal Histories from Participation in HUD Programs"

## ADDITIONAL OBSERVATIONS

Here are additional changes that were made in the FY2025 CoC Program NOFO re-issued on December 19th for public review:

- "Public and state-controlled institutions of higher education" and "Private institutions of higher education" are now listed as eligible applicants under Section II.A on page 10.
- Under "Additional Information on Eligibility" in Section II.A on page 10, HUD has expanded the language regarding faith-based organizations to note that they will retain independence and may continue to carry out their mission and may seek religious accommodations. They go on to highlight that nothing in the NOFO shall interfere with their rights to apply as a qualified solo applicant.
- HUD added language under the NOFO Summary (on page 5) which says, "This does not alter all applicable protections and obligations under the original Violence Against Women Act of 1994 (Pub.L. 103-322), codified mainly in 42 U.S.C. 13925 et seq., appearing in 108 Stat. 1796; as well as the Violence Against Women Reauthorization Act of 2022, Pub. L. 117-103) 34 (e.g., 34 U.S.C. 12491 (VAWA))." Further, under Section IV.D.1.d on page 43, HUD added language for DV Renewal Projects that states, "This incorporates by reference all applicable protections and obligations under VAWA as provided for in Section I.A." No such language was added in relation to new DV Bonus projects.
- Under Section IV.2.j (on page 55), HUD has added language on "compliance and re-evaluation" which states, "To maintain the competitive and objective nature of the CoC Program under the McKinney Vento Act and comply with 2 CFR 200.309 and 200.205, which together require renewals for federal grants to be issued based on objective and merit-based criteria, all renewals will be re-evaluated each year. Further, HUD may condition renewal on compliance with audits for large grant recipients (over \$1,000,000) as required by 2 CFR 200.501."