



Overall Side By Side Comparison of FY24 and FY 25 CoC Program Competition NOFOs

FY 2024 and FY 2025 Continuum of Care Competition and Renewal or Replacement of Youth Homeless Demonstration Program Grants	FY 2025 Continuum of Care Competition and youth Homelessness Demonstration Program Grants
Youth Homelessness Demonstration Program (YHDP) projects renewing under the CoC Program awarded noncompetitively	Youth Homelessness Demonstration Program (YHDP) projects renewing under the CoC Program awarded competitively
Transitional housing and projects that deliver supportive services only permitted as renewal grants only	Permitted and encouraged to apply for Transitional housing and projects that deliver supportive services only as new projects (reallocated from existing renewal project funding)
In accordance with the statute, incentives are provided for permanent housing projects only	In order to invest in more transitional housing and supportive services only projects, HUD is limiting the amount of permanent housing (PH and RRH) to 30 percent of eligible award amount
CoCs rank projects into two tiers and HUD selects projects based on how they rank individual projects and whether they are in tier 1 or 2. Depending on CoC score, a CoC could lose some or all of projects ranked in Tier 2. Tier 1 = 90% of funds “held harmless” and not dependent on CoC overall score. Tier 2 = 10% of funds dependent on CoC overall score. Ensures vast majority of renewal funding is protected to avoid disruption even if CoC does not receive a high score. Depending on score, a CoC could lose	CoCs rank projects into two tiers and HUD selects projects based on how they rank individual projects and whether they are in tier 1 or 2. Depending on CoC score, a CoC could lose some or all of projects ranked in Tier 2. Tier 1 = 30% of funds “held harmless” and not dependent on CoC overall score. Tier 2 = 70% of funds dependent on CoC overall score.

FY 2024 and FY 2025 Continuum of Care Competition and Renewal or Replacement of Youth Homeless Demonstration Program Grants	FY 2025 Continuum of Care Competition and youth Homelessness Demonstration Program Grants
Project eligibility threshold -pass/fail standard that assesses the extent in which a project is eligible, meets financial and management capacity, submits all required standard certifications, will serve only eligible populations, and will agree to participate in HMIS (unless DV)	Project eligibility threshold -pass/fail standard that assesses the extent in which a project is eligible, meets financial and management capacity, submits all required standard certifications, will serve only eligible populations, and will agree to participate in HMIS (unless DV) and certifies affirmatively that the project applicant will not engage in racial preferences or other forms of illegal discrimination and will not engage in any activities under the pretext of “harm reduction.”
Project quality threshold- HUD reviews all new projects to assess the extent in which it meets additional capacity standards and must receive a minimum number of points for rating criteria for relevant project type.	Project quality threshold- HUD reviews all new projects to assess the extent in which it meets additional capacity standards and must receive a minimum number of points for rating criteria for relevant project type. In addition, HUD has added new language that allows HUD to verify past performance and reject a project if there is evidence that it has previously or currently engaged or engages in racial preferences or other forms of illegal discrimination, engaged or engages in in activities that “violate the sex binary in humans,” and, engaged or engages in any activities under the pretext of “harm reduction. How this will be assessed is unclear.
Project Rating Criteria for eligible new project types consistent with years prior- focus on assisting participants obtain and remain in housing, connecting with mainstream benefits, supportive service participation is voluntary.	Project rating criteria across project types include key differences. Examples Include: New TH and PH (PSH and RRH) will be scored on the extent in which service participation is required (with onsite services preferred). For TH projects, applicants will be scored on the extent to which they will provide 40 hours of customized services for each program participant. New grants for street outreach are scored on the extent in they cooperate with law enforcement to enforce local laws such as public camping and public drug use laws.

FY 2024 and FY 2025 Continuum of Care Competition and Renewal or Replacement of Youth Homeless Demonstration Program Grants	FY 2025 Continuum of Care Competition and youth Homelessness Demonstration Program Grants
Project renewal threshold requires renewal project applications to meet the minimum project eligibility, capacity, timeliness, and performance standards identified in this NOFO or be rejected from consideration.	Project renewal threshold requires renewal project applications to meet the minimum project eligibility, capacity, timeliness, and performance standards identified in this NOFO or be rejected from consideration. Added two additional reasons for HUD to reject a renewal project from the competition: evidence that the project has previously or currently engages or engaged in racial preferences or other forms of illegal discrimination, engages or engaged in activities that violate the “sex binary in humans”, or engages or engaged in activities under the pretext of “harm reduction.”
CoC Application Scoring awards points to CoCs across 7 rating areas with no significant differences from year prior. Focus on systemwide performance, the use of inclusive processes, racial equity and addressing disparities, the promotion of client choice and voluntary services, and strategies that prevent the criminalization of homelessness.	Now referred to as a Merit Review which is comprised of 3 rating areas with many significant differences. In addition to removing many of the previous criteria upon which CoCs were scored, several new criteria were added that will disadvantage the majority—if not all—CoCs and current recipients of funding because of how far they swing from past expectations. These include rating factors tied to the extent in which existing projects require service participation and the existence of state or local laws that cover the CoCs entire geographic area that prohibit illicit drug use and camping. Historically, HUD has given CoCs at least one year of notice of shifting priorities that allow time to adopt and implement. Given that scoring will now determine 70% of award decisions, this could result in many CoCs losing a large proportion of their existing funding.
NOFO did not include any preference points associated with administration initiatives.	Includes initiative preference points: 1. If more than 50% of proposed activities happen within an Opportunity Zone 2. If all non-profit applicants/recipients of funding voluntarily, thoroughly, and demonstrably facilitate verification of immigration status using SAVE directly or in coordination with state/local government

FY 2024 and FY 2025 Continuum of Care Competition and Renewal or Replacement of Youth Homeless Demonstration Program Grants	FY 2025 Continuum of Care Competition and youth Homelessness Demonstration Program Grants
HUD may use a risk-based approach in reviewing projects and may consider factors tied to administrative requirements and performance requirements. Examples of factors considered for past performance include accounting for use of funds, timely submission of reports, meeting performance targets in grant agreement, producing positive outcomes and results. HUD may reduce overall score based on past performance and could take additional remedies if there is an adverse finding.	Now referred to as a “risk review” with two distinct changes of significance. There is a new criterion: “History of subsidizing or facilitating activities that conflict with the purposes of this NOFO.” Further, rather than incorporating this as part of the scoring component, it is now a separate component in the selection process. This would essentially allow HUD to target any organization that it deems to be not aligned with the administration— regardless of outcomes or performance at responding to homelessness— and place any projects, new and renewal, that they request at risk of not being funded.
In selecting projects for funding, there are certain project types that would be selected noncompetitively before looking at ranked projects in tiers. These include CoC Planning (or UFA Costs projects, if applicable), YHDP renewal/replacement projects, and DV Bonus projects.	In selecting projects for funding, only CoC Planning (or UFA Costs projects, if applicable), will be selected before looking at ranked projects in tiers. This means all other project types—including YHDP and DV Bonus projects--will be competitively awarded.
Projects ranked in Tier 1 are awarded first based on passing project eligibility, quality, and threshold review. CoC score is only a factor if amount of funding available under the NOFO is reduced. Equals 90% of all CoC funding.	Projects ranked in Tier 1 are awarded first based on passing project eligibility, quality, and threshold review. CoC score is only a factor if amount of funding available under the NOFO is reduced. Equals 30% of all CoC funding.
Projects ranked in Tier 2 are awarded based on a project score that takes into account the CoC score, the project ranking, and commitment to housing first.	Projects ranked in Tier 2 are awarded based on a project score that takes into account the CoC score, the project ranking, and commitment to service participation requirements.

FY 2024 and FY 2025 Continuum of Care Competition and Renewal or Replacement of Youth Homeless Demonstration Program Grants	FY 2025 Continuum of Care Competition and youth Homelessness Demonstration Program Grants
NOFO outlines all administrative, national, and departmental policy requirements and terms that all projects must comply with. These include requirements associated with a broad range of statutes and regulations including fair housing, the ADA, and Section 504, some departmental-specific policy, and specific Executive Orders such as those focused on racial equity and equity for LGBTQ+ populations. This is important to note because projects and CoCs will be penalized in FY2025 for participation in certain activities which they were required to comply with.	NOFO outlines all administrative, national, and departmental policy requirements and terms that all projects must comply with. These include requirements associated with a broad range of statutes and regulations including fair housing, the ADA, and Section 504, some departmental-specific policy, and specific Executive Orders. Removes requirements associated with past HUD policy and prior Executive Orders. The NOFO also adds new conditions which prohibit awardees from engaging in activities that: facilitate racial preferences or other forms of illegal discrimination—including the use of ‘proxies for race’-or activities that violate the “sex binary in humans”; fund promote or encourage the use of illicit drugs or are done under the pretext of harm reduction.
Solo Applicants are applicants that apply as an organization outside of the CoC process <i>after</i> they have attempted to participate but were not permitted to do so.	Solo Applicants are applicants that apply as an organization outside of the CoC process <i>after</i> they have attempted to participate but were not permitted to do so. There may be different deadlines for solo applicants.