

THE COALITION OF HOMELESS SERVICES PROVIDERS

Frequently Asked Questions – *Updated 12/10/25*

NOFO 2025

Disclaimer: The answers we can provide at this time are based on the FY 2025 CoC NOFO released by HUD on 11/13/2025 and withdrawn by HUD on 12/8/2025. HUD stated they intend to release an updated NOFO. In the meantime, the withdrawn NOFO and relevant federal regulations are what we have available for information to support the local application process.

Q: Should we continue to apply based on the current NOFO hold?

A: The Delegation Body would like to continue with the proposed schedule of having applications submitted by 12/14, however we will pause the ranking process in case HUD re-releases the NOFO. If the revised NOFO includes new or different requirements, we will return applications to organizations so they can make any needed updates.

We would like to ensure that we preserve as much time as possible should the NOFO be reissued with similar deadlines. If HUD satisfies the judge's requirements on Monday and immediately re-releases the NOFO, we would still be looking at a 1/15 HUD submission date—only gaining about one extra day.

Q: How do I apply?

A: CHSP will post application materials on the CoC website as well as send out an email notification with all relevant documents.

Q: When is my application due?

A: December 14th at 5pm, emailed to grants@chsp.org

Q: Will we use submittable?

A: Applications will be submitted via Excel Doc. Once completed the document will be emailed to grants@chsp.org

Q: When will our program be notified on denial or approval?

A: Projects will be notified of their initial ranking on December 18, 2025.

Q: Do all the requirements apply to renewal projects as well as new projects?

A: It applies to new as well as renewals.

Q: How do we prove partnerships and compliance with law enforcement?

A: This response will be updated upon further clarification from HUD.

Q: Is there a bidders conference scheduled?

A: Local competition orientation is scheduled for 12/3/25 from 10am-11:30am via Zoom. Register here: <https://us02web.zoom.us/meeting/register/PcxvFAQgRSeoqqOZOmHIQQ>

Q: Will the scoring tool be released?

A: The scoring criteria for new and renewal projects will be included in the Policies and Procedures.

Q: If we cannot transition from permanent supportive housing to transitional housing, are we still eligible to apply?

A: Yes, programs are still encouraged to apply. But please note, there is a 30% funding cap on permanent housing solutions.

Q: How will applications be prioritized?

A: Projects applying through the local competition will be reviewed and ranked by an independent panel and placed into a Tier system (T1 and T2).

Q: Are there any disqualifying factors?

A: HUD may reject applications where wording is included in projects for racial preferences, harm reduction activities, or non-binary gender definitions. HUD may consider media reports, Inspector General and Government Accountability Office findings, public complaints, or an organization's "history of subsidizing activities that conflict with the NOFO" as grounds for denying funding.

Q: What will HUD evaluate?

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

Project applicants will be required to affirm that they will (1) not engage in racial preferences or other forms of illegal discrimination and (2) not engage in any activities under the pretext of 'harm reduction'. HUD may also reduce or reject applications in which project applicants have previously or currently engaged in these activities.

Renewal projects could also be reduced or rejected if there is evidence that the project has previously or currently conducted activities that rely on or otherwise use "a definition of sex other than as binary in humans."

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).

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 be designed to serve elderly individuals and/ or individuals with a physical disability/impairment (not including substance use disorder) and require participation in supportive services.

New Rapid Rehousing projects must demonstrate that the project applicant has previously operated a project with higher-than-average outcomes on increasing employment income and will require participation in supportive services

Q: Will there be an appeal process?

A: Yes, appeals will be due on 12/19/25 at 12pm. They should be emailed to grants@chsp.org

Q: Will HMIS data be reviewed?

A: Yes, CHSP pulls APRs for renewal projects and will be pulling SPMs to evaluate returns to homelessness. Projects new to the CoC competition will not have their HMIS data reviewed.

Q: What supportive services are covered under the COC?

A: (1) Annual Assessment of Service Needs. The costs of the assessment required by [§ 578.53\(a\)\(2\)](#) are eligible costs.

(2) Assistance with moving costs. Reasonable one-time moving costs are eligible and include truck rental and hiring a moving company.

(3) Case management. The costs of assessing, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the program participant(s) are eligible costs. Component services and activities consist of:

(i) Counseling;

(ii) Developing, securing, and coordinating services;

(iii) Using the centralized or coordinated assessment system as required under [§ 578.23\(c\)\(9\)](#).

(iv) Obtaining federal, State, and local benefits;

(v) Monitoring and evaluating program participant progress;

(vi) Providing information and referrals to other providers;

(vii) Providing ongoing risk assessment and safety planning with victims of domestic violence, dating violence, sexual assault, and stalking; and

(viii) Developing an individualized housing and service plan, including planning a path to permanent housing stability.

(4) Child care. The costs of establishing and operating child care, and providing child-care vouchers, for children from families experiencing homelessness, including providing meals and snacks, and comprehensive and coordinated developmental activities, are eligible.

(i) The children must be under the age of 13, unless they are disabled children.

(ii) Disabled children must be under the age of 18.

(iii) The child-care center must be licensed by the jurisdiction in which it operates in order for its costs to be eligible.

(5) Education services. The costs of improving knowledge and basic educational skills are eligible.

(i) Services include instruction or training in consumer education, health education, substance abuse prevention, literacy, English as a Second Language, and General Educational Development (GED).

(ii) Component services or activities are screening, assessment and testing; individual or group instruction; tutoring; provision of books, supplies, and instructional material; counseling; and referral to community resources.

(6) Employment assistance and job training. The costs of establishing and operating employment assistance and job training programs are eligible, including classroom, online and/or computer instruction, on-the-job instruction, services that assist individuals in

securing employment, acquiring learning skills, and/or increasing earning potential. The cost of providing reasonable stipends to program participants in employment assistance and job training programs is also an eligible cost.

(i) Learning skills include those skills that can be used to secure and retain a job, including the acquisition of vocational licenses and/or certificates.

(ii) Services that assist individuals in securing employment consist of:

(A) Employment screening, assessment, or testing;

(B) Structured job skills and job-seeking skills;

(C) Special training and tutoring, including literacy training and pre-vocational training;

(D) Books and instructional material;

(E) Counseling or job coaching; and

(F) Referral to community resources.

(7) Food. The cost of providing meals or groceries to program participants is eligible.

(8) Housing search and counseling services. Costs of assisting eligible program participants to locate, obtain, and retain suitable housing are eligible.

(i) Component services or activities are tenant counseling; assisting individuals and families to understand leases; securing utilities; and making moving arrangements.

(ii) Other eligible costs are:

(A) Mediation with property owners and landlords on behalf of eligible program participants;

(B) Credit counseling, accessing a free personal credit report, and resolving personal credit issues; and

(C) The payment of rental application fees.

(iii) Housing counseling, as defined in [§ 5.100](#), that is funded with or provided in connection with grant funds must be carried out in accordance with [§ 5.111](#). When recipients or subrecipients provide housing services to eligible persons that are

incidental to a larger set of holistic case management services, these services do not meet the definition of Housing counseling, as defined in [§ 5.100](#), and therefore are not required to be carried out in accordance with the certification requirements of [§ 5.111](#).

(9) Legal services. Eligible costs are the fees charged by licensed attorneys and by person(s) under the supervision of licensed attorneys, for advice and representation in matters that interfere with the homeless individual or family's ability to obtain and retain housing.

(i) Eligible subject matters are child support; guardianship; paternity; emancipation; legal separation; orders of protection and other civil remedies for victims of domestic violence, dating violence, sexual assault, and stalking; appeal of veterans and public benefit claim denials; landlord tenant disputes; and the resolution of outstanding criminal warrants.

(ii) Component services or activities may include receiving and preparing cases for trial, provision of legal advice, representation at hearings, and counseling.

(iii) Fees based on the actual service performed (i.e., fee for service) are also eligible, but only if the cost would be less than the cost of hourly fees. Filing fees and other necessary court costs are also eligible. If the subrecipient is a legal services provider and performs the services itself, the eligible costs are the subrecipient's employees' salaries and other costs necessary to perform the services.

(iv) Legal services for immigration and citizenship matters and issues related to mortgages and homeownership are ineligible. Retainer fee arrangements and contingency fee arrangements are ineligible.

(10) Life skills training. The costs of teaching critical life management skills that may never have been learned or have been lost during the course of physical or mental illness, domestic violence, substance abuse, and homelessness are eligible. These services must be necessary to assist the program participant to function independently in the community. Component life skills training are the budgeting of resources and money management, household management, conflict management, shopping for food and other needed items, nutrition, the use of public transportation, and parent training.

(11) Mental health services. Eligible costs are the direct outpatient treatment of mental health conditions that are provided by licensed professionals. Component services are crisis interventions; counseling; individual, family, or group therapy sessions; the

prescription of psychotropic medications or explanations about the use and management of medications; and combinations of therapeutic approaches to address multiple problems.

(12) Outpatient health services. Eligible costs are the direct outpatient treatment of medical conditions when provided by licensed medical professionals including:

(i) Providing an analysis or assessment of an individual's health problems and the development of a treatment plan;

(ii) Assisting individuals to understand their health needs;

(iii) Providing directly or assisting individuals to obtain and utilize appropriate medical treatment;

(iv) Preventive medical care and health maintenance services, including in-home health services and emergency medical services;

(v) Provision of appropriate medication;

(vi) Providing follow-up services; and

(vii) Preventive and noncosmetic dental care.

(13) Outreach services. The costs of activities to engage persons for the purpose of providing immediate support and intervention, as well as identifying potential program participants, are eligible.

(i) Eligible costs include the outreach worker's transportation costs and a cell phone to be used by the individual performing the outreach.

(ii) Component activities and services consist of: initial assessment; crisis counseling; addressing urgent physical needs, such as providing meals, blankets, clothes, or toiletries; actively connecting and providing people with information and referrals to homeless and mainstream programs; and publicizing the availability of the housing and/or services provided within the geographic area covered by the Continuum of Care.

(14) Substance abuse treatment services. The costs of program participant intake and assessment, outpatient treatment, group and individual counseling, and drug testing are

eligible. Inpatient detoxification and other inpatient drug or alcohol treatment are ineligible.

(15) Transportation. Eligible costs are:

(i) The costs of program participant's travel on public transportation or in a vehicle provided by the recipient or subrecipient to and from medical care, employment, child care, or other services eligible under this section.

(ii) Mileage allowance for service workers to visit program participants and to carry out housing quality inspections;

(iii) The cost of purchasing or leasing a vehicle in which staff transports program participants and/or staff serving program participants;

(iv) The cost of gas, insurance, taxes, and maintenance for the vehicle;

(v) The costs of recipient or subrecipient staff to accompany or assist program participants to utilize public transportation; and

(vi) If public transportation options are not sufficient within the area, the recipient may make a one-time payment on behalf of a program participant needing car repairs or maintenance required to operate a personal vehicle, subject to the following:

(A) Payments for car repairs or maintenance on behalf of the program participant may not exceed 10 percent of the Blue Book value of the vehicle (Blue Book refers to the guidebook that compiles and quotes prices for new and used automobiles and other vehicles of all makes, models, and types);

(B) Payments for car repairs or maintenance must be paid by the recipient or subrecipient directly to the third party that repairs or maintains the car; and

(C) The recipients or subrecipients may require program participants to share in the cost of car repairs or maintenance as a condition of receiving assistance with car repairs or maintenance.

(16) Utility deposits. This form of assistance consists of paying for utility deposits. Utility deposits must be a one-time fee, paid to utility companies.

(17) Direct provision of services. If the service described in [paragraphs \(e\)\(1\) through \(e\)\(16\)](#) of this section is being directly delivered by the recipient or subrecipient, eligible costs for those services also include:

- (i) The costs of labor or supplies, and materials incurred by the recipient or subrecipient in directly providing supportive services to program participants; and
- (ii) The salary and benefit packages of the recipient and subrecipient staff who directly deliver the services.

Q: As it relates to Transitional Housing, is there clarification on whether or not TH programs can pay participants' rents? In some instances, our projects need/use the rent payments for operations.

*A: Transitional Housing projects can pay participant rents. These projects would need to include the rental assistance budget line item ([Eligible Costs](#)) and similar to Rapid Rehousing, the program can provide rental assistance and supportive services for up to 24 months ([Transitional Housing](#)). Additionally, though, TH projects can have an operating costs line item for Transitional Housing and they could explore if that would be a better fit for their project. **Unfortunately, they cannot have both operating cost and rental assistance in the same project.***

If the situation is that they are hoping to use the participant-paid rents, then I would clarify that they can both pay rent and charge rent, per this guidance on the [HUD Exchange - Charging Rent](#).

I would strongly encourage applicants considering using rental assistance in this way to ensure that the uses align with the eligible ways to use rental assistance funds. Here are some resources that may help:

- [Rental Assistance Eligible Activities](#) - Including the information on the subsections here, Rental Assistance budgets, Types of Rental Assistance, and Managing Rent, Costs, and Budgets
- [24 CFR 578.51](#) - This is the CFR language around Rental Assistance
- [Operating Costs Eligible Activities](#) - Including the subsection on Ineligible costs and other program requirements
- [24 CFR 578.55](#) - This is the CFR language around Operating Costs

Q: Can providers voluntarily cut their own budgets to be able to fund more of another project? ex. Can a provider not go for the full amount of their renewal in which we reallocate to another provider?

A: Technically, they can do this; however, there is no guarantee that the panel would decide to fund said provider with the reallocated amount. They could document that this is the intention in a cover email, or this can be tracked as the strategy. You could share this idea and strategy with the panel, but ultimately, they would need to select the best possible project for reallocated funding.

Q: Interpretation of mandatory service participation for permanent housing: Can there be additional clarification if that means providers only need to mandatorily provide services or that participants are mandated to participate?

*A: For clarification, the references in the NOFO to service participation requirements for PH are related to **new permanent housing projects**. In theory, we are not accepting new PH projects, therefore this shouldn't immediately apply; however, any renewal making significant changes may become subject to the new requirements.*

NOFO included references to require service participation. We do not have any additional information from HUD around this; however, we would err that since it says "project will require program participants..." we anticipate that the service agreements likely need to reflect what would happen if a participant did not engage in services. This may be being confused with the transitional housing requirement to also provide 40 hours of services per week to participants, which reads as a requirement that providers must make those services available and require participation (similar to the PH language).

Q: Is there any guidance on whether projects should leave open units vacant? Programs may run the risk of re-traumatizing participants if they are accepted into a program, only to be removed.

A: Unfortunately, there isn't any clear guidance on this. In some cases, communities have stopped referrals to PH projects that may be eliminated through the competition; however, this was before the NOFO was removed, and it wasn't a consistent method everywhere. This is an ongoing discussion.

Q: Do we provide the number of how many individuals we are looking to serve in the renewal year or how many we have served in the last year, or how many served since awarded?

A: You should provide the number of individuals you expect to be served in the renewal year.

Q: Is there a character count for the narrative?

A: No, there is no character count for narratives.

Q: Is a budget narrative required?

A: No, it is not a required component of the application this year; however, we encourage people to provide a brief narrative in the project description section.