

## Frequently Asked Questions (FAQ) for FY25 HUD CoC NOFA

**1. Will HUD provide an extension to the project application deadline of 12/15/2025?**

This is a HUD required deadline for all project applications to be submitted through e-Snaps by 5pm on 12/15/2025. Any changes will be communicated by VC CoC staff to the full CoC Alliance and posted on the VC CoC website.

Please note that a lawsuit has been filed by 20 States and the National Alliance to End Homelessness (NAEH) against HUD to legally challenge the FY25 HUD CoC NOFO. Any further changes by HUD during this NOFO process may impact scoring criteria, thresholds, and our timeline.

**2. Does the CoC need to add a new project applicant to the e-Snaps system?**

The CoC does not add or access your organization's profile. You will need to create your own user profile and organizational applicant profile. Please see the step-by-step instructions here: <https://www.hudexchange.info/programs/e-snaps/>

**3. Is there recommended phrasing for describing treatment expectations?**

We expect HUD to request details on the services offered onsite for treatment. The HUD CFR 578.53(e)(14) describes eligible substance abuse treatment services as follows: Intake and assessment, outpatient treatment, group and individual counseling, and drug testing. More details on supportive services are posted on the HUD exchange: <https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-eligible-activities/supportive-services/>

**4. If mandatory service participation is required under this NOFO, could projects be penalized in other funding applications for having those requirements?**

We expect HUD CoC funded projects to leverage other sources that do not conflict with these new service participation requirements. The rating factors included in the HUD CoC NOFO are specific to CoC funded projects; however, there is a possibility that HUD will review any online materials or previous applications to look for alignment with the federal administration priorities.

**5. For employment/income measures, how should outcomes be prorated for populations with limited work capacity (i.e., seniors and individuals with physical disabilities)?**

Seniors 62+ and those with certified disabilities are exempt from the "earned income" measure. These populations will need to be measured in the "unearned income" (SSI) measure for reporting.

**6. Does providing supportive services in scattered site (offsite) units meet the HUD's new criteria for service participation?**

According to the FY25 HUD CoC NOFO project application review criteria, the project must demonstrate how supportive services and assistance will be offered to program participants to successfully obtain and retain housing, including where appropriate, onsite supportive services. In scattered site units, this would mean

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going to the participant's housing for case management and not requiring them to come to a clinic or office.

**7. Can you clarify if individuals with a mental health disability can continue to be served under the HUD criteria of “physical disability/impairment”?**

According to the FY25 HUD CoC NOFO, the disability types must align with 24 CFR 582.5, not including substance use disorder. This includes those with physical, mental, or emotional impairment. Defined in the section “Person with Disabilities”: <https://www.ecfr.gov/current/title-24/subtitle-B/chapter-V/subchapter-C/part-582/subpart-A/section-582.5> It is uncertain how HUD will interpret qualifying disability for existing projects, but per the NOFO, new projects will have to use this new criteria unless overturned by Congress or the courts.

Further details on HUD CoC program guidance and regulations are posted on the HUD Exchange here: <https://www.hudexchange.info/programs/coc/>

The HUD e-Snaps Navigational Guide for Project Applicants is posted here: <https://www.hud.gov/sites/dfiles/CPD/documents/CoC/FY25-CoC-Project-Applicant-Profile-eSNAPs-Navigational-Guide.pdf>