

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>

8. Does the requirement to submit formal letters of commitment for leveraged housing and healthcare resources apply to all projects—both renewals and new applications?

According to the FY25 HUD CoC NOFO, the CoC must demonstrate that PSH and/or TH projects leverage housing and healthcare resources for at least 25 percent of the units included in each project. These resources may include those provided by private organizations, state or local government agencies, public housing agencies, or faith-based organizations. Attachments must include letters of commitment, contracts, or other formal documents.

9. If current PSH participants have physical disabilities with substance abuse issues, would they no longer qualify?

The [McKinney-Vento Homeless Assistance Act](#) defines disabling conditions as 1) expected to be long-continuing or of indefinite duration; 2) substantially impedes the individual's ability to live independently; 3) could be improved by the provision of more suitable housing conditions; and 4) is a physical, mental, or emotional impairment, developmental disability, or the disease of acquired immune-deficiency syndrome. According to the FY25 HUD CoC NOFO, substance use disorders no longer qualifies. Our VC CoC is awaiting further guidance from HUD on those who were previously deemed eligible with substance use disorders.

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10. What are the supportive service participation requirements for transitional housing?

Supportive Services are defined by HUD in [24 CFR 578.53](#) as services that help participants obtain and maintain housing. The FY25 HUD CoC NOFO requires program participants to take part in supportive services by signing an agreement. HUD has not yet released a template or example of this agreement to CoCs.

11. Do PSH participants 62+ have to meet service participation requirements?

According to the FY25 HUD CoC NOFO, elderly 62+ and those with certified disabling conditions are not required to complete the 40 hours/week of service participation requirement.

12. Can you please define a little bit more what you mean by Operations under the TH category? For example - property management, maintenance, utilities, insurance etc. to operate a TR facility - are these eligible?

According to 24 CFR 578.37, Transitional Housing grant funds may be used for acquisition, rehabilitation, new construction, leasing, rental assistance, operating costs, and supportive services. 24 CFR 578.55 defines operating costs as the day-to-day operation of transitional housing which may include the maintenance and repair of housing, property taxes and insurance, schedule payments to a reserve for the replacement of major systems of the housing, building security for a structure where more than half of the units are paid with grant funds, electricity, gas, water, furniture, and equipment.

13. Can other federal grants be used for match or leverage?

Yes, other federal funding sources may be used as match, excluding CoC program funds; however, grantees must verify with the regulations of the proposed federal funding source to ensure that it can be used for HUD CoC match. Please see more details in 24 CFR 578.73.

14. Is Homeless Prevention eligible for this grant and, if so, could we use it to support client's in PSH in remaining housed?

Homeless prevention is not eligible under the HUD CoC program. Please consider applying for the State Homeless Housing Assistance and Prevention (HHAP) Program.