

2025 CoC Competition

LHCB

January 5, 2026

Agenda

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2025 CoC NOFO Summary

Status summary of the NOFO

- On November 13th, HUD released the CoC NOFO with some of the most substantial changes the CoC program has seen, including a 30% cap on Permanent Housing (PH) and other major shifts in priorities and policy.
- San Francisco was awarded ~\$56 million in the 2024 competition, largely for Permanent Supportive Housing and some Rapid Re-Housing (both considered PH).
- Due to the contents and timeline of the initial NOFO, a coalition of communities sued, and many communities paused their competitions.
- A preliminary injunction was granted December 23rd preserving the “status quo” of the prior NOFO.



U.S. Department of Housing and Urban Development

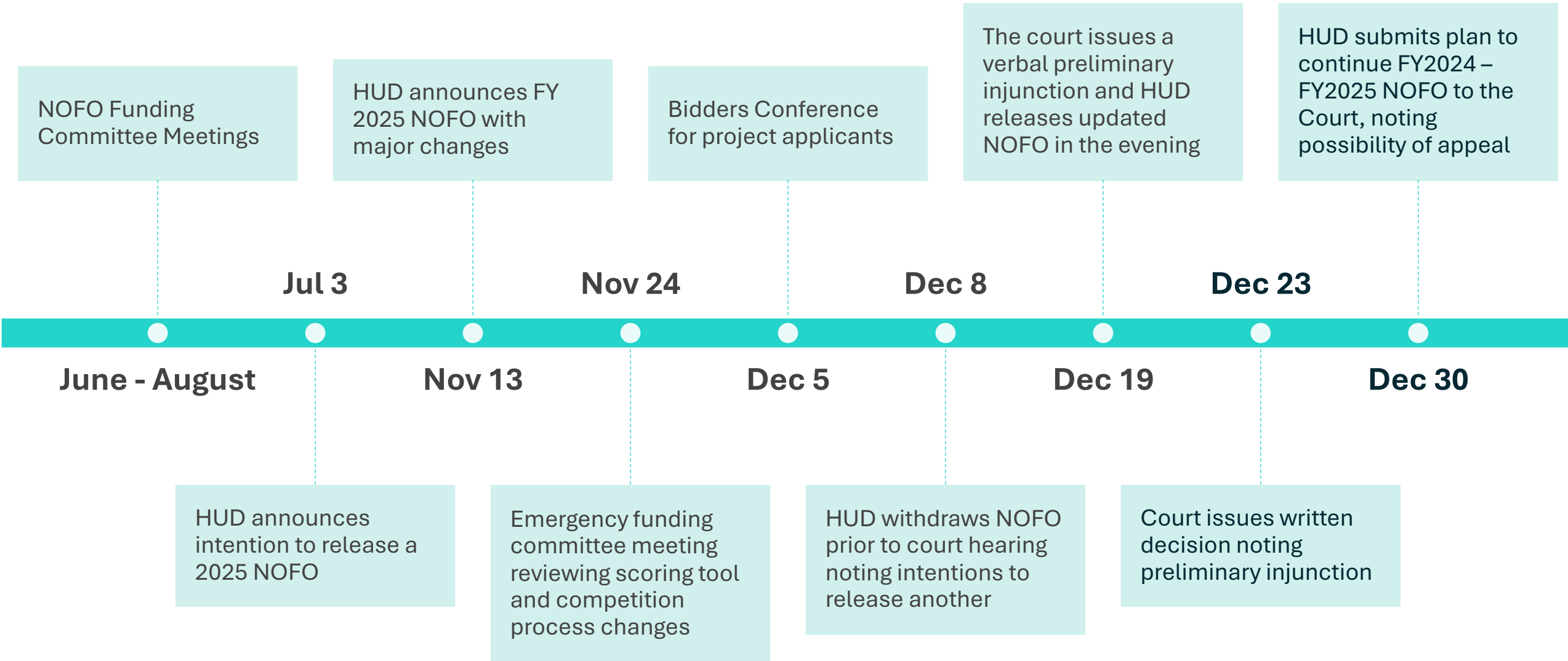
Community Planning and Development

FY 2024 and FY 2025 Continuum of Care Competition and Renewal or Replacement of Youth
Homeless Demonstration Program Grants

FR-6800-N-25

08/29/2025

2025 NOFO Timeline



Where We're At

At the December 19th hearing, the Court issued a verbal preliminary injunction, with the full written decision released on December 23rd. A preliminary injunction is a temporary court order issued early in a lawsuit to prevent a party from taking certain actions that could cause irreparable harm.

Impacts of Preliminary Injunction:

- HUD released an updated NOFO in the evening of the 19th with a message noting active litigation prevented it from going into effect
- To preserve the “status quo” in the case, the written decision from the Court prevented HUD from taking back the two-year NOFO and issuing a new one
- HUD was ordered to submit a plan for how renewals will be processed by 12.30 and notify applicants by 1.6
- If a new NOFO is issued, the parties involved will need to determine if it resolves the case, or whether it leads to another emergency court action

Next Steps

On December 30th, HUD submitted their Court ordered plan for the process of how eligible renewals and reallocations will be process. The initial plan includes some information and dates, but more specifics won't be known until HUD reopens and reposts the FY24-25 CoC NOFO.

From HUD's Plan:

- On January 6th, HUD will reopen and repost the FY24-25 NOFO with an extended deadline and anticipated award date likely in May 2026
- By approximately February 19th, HUD will close the application window
- CoCs will need to submit their FY25 priority listing, Certifications of Consistency (where relevant), renewal, reallocation, planning, and project applications
- No information was included in the plan on the potential for new projects
- HUD reserves the right to issue a new NOFO if/when a court order does not prevent it

Questions and discussion