2025 CoC Competition

LHCB

December 1, 2025

Agenda

1. CoC Program Context
2. Summary of Changes
3. New Projects and Timeline
4. San Francisco Implications
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CoC Program Context

The annual funding process

- The CoC Program is THE federal program dedicated to addressing homelessness
- $3-4 billion is competitively awarded annually to fund HMIS, CE, housing, and services (previously had to be tied to housing)
- In total, San Francisco was awarded ~$56 million in the 2024 competition, largely for PSH and some RRH
- While the CoC Program is a consistent funding source, the amounts are relatively stagnant year over year with the general exception of an increase in a community's Fair Market Rent (FMR)

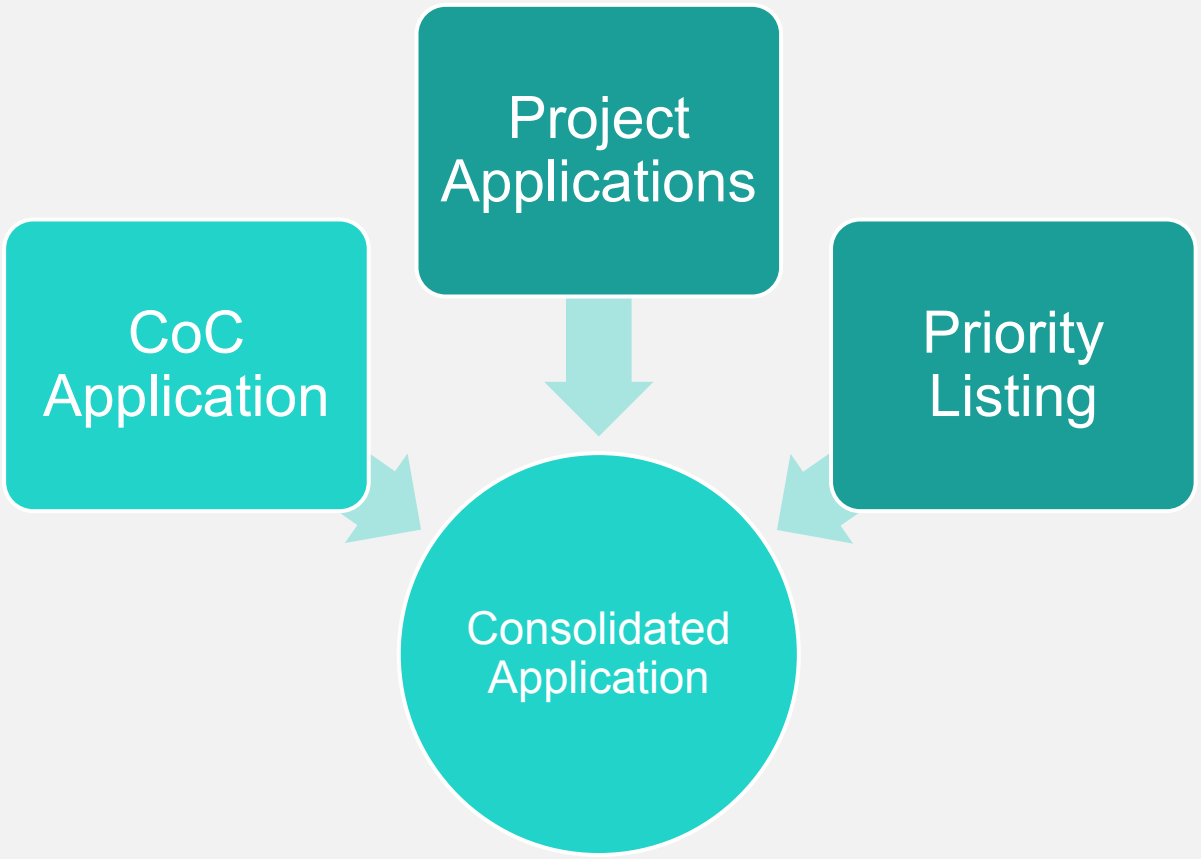
U.S. Department of Housing and Urban Development

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

CoC Program Context

The Application Process



CoC Program Context

Part 1: Local Competition

The CoC decides on how projects will be scored	Agencies submit local applications	Local applications are “reviewed & ranked” by a scoring panel

Part 2: National Competition

The CoC submits the Collaborative Application to HUD	HUD decides what to fund	**The CoC’s Priority Listing is key!**

CoC Program Context

The Continuum of Care (CoC) Program is THE federal source of funding to address homelessness. Nationally, around $3.5b is generally made available for the annual competitive process. In the prior competition, SF was awarded around $56m.

HUD's CoC Program

- Largely funds permanent housing nationally, with options for new PSH, RRH, joint TH-RRH, HMIS, and CE projects in prior competition
- SF largely funds PSH, with some RRH, HMIS, CE, and a TH project

The Two-Part Competition

- Local competition to pick our projects
- National competition for HUD to decide what to fund

Summary of Changes

The 2025 CoC NOFO has some of the most significant changes the CoC program has seen. Due to these changes, there are potential implications for existing individual CoC projects and HSH subrecipients, new project applicants, the San Francisco community score, and the overall amount of CoC funding San Francisco gets.

Big Picture Changes:

- No more than 30% of ARD can be for permanent housing (PSH and RRH in SF)
- Tier 1 is 30% of ARD, meaning most funding is competitive as opposed to "guaranteed"
- Policy shifts away from housing first and harm reduction and towards required service participation, substance use treatment, and a binary definition of sex
- Changes to eligible project types and threshold requirements, including potential for new transitional housing and support services only projects (including street outreach), while also removing joint TH-RRH as a new project

Summary of Changes

Historically	2025 Competition
Points for **not** requiring service participation	**Must** require service participation
Only funded permanent housing	**Cap** on funding for permanent housing
No new outreach or transitional housing	**Priority** for outreach and transitional housing
85-95% of funding was “safe” in Tier 1	**Less than 30%** of funding is “safe” in Tier 1

New Projects

New Projects

How projects get funded

- Both new and renewal projects must pass threshold factors. This year, there are several significant changes to those factors, particularly for new projects
- For example, a new TH project would **at minimum** need either required service participation or 40/week of services/employment per participant
- Projects in Tier 2 are evaluated on a 100-point scale with 50 points coming from the CoC score, 40 points coming from the project's ranking on the list, and 10 points for service participation requirements

Transitional Housing

…for people experiencing homelessness

- 24-month time limit
- All participants must be referred through the local Coordinated Entry System
- Applicant must provide housing assistance, case management, and services or service connections to support housing stability

Transitional Housing

…for people experiencing homelessness

Housing assistance

- Could be:
  - Rental assistance to participants;
  - Leased housing; or
  - Housing you own.
- Must meet federal Housing Quality Standards
- Local application points for supporting 25% of units through non-CoC resources

Transitional Housing

…for people experiencing homelessness

Supportive Services

- Must include case management and connections to any services that address participants' individual housing barriers
- Must require participants to take part in services
- Must provide 40 hours per week of individualized supportive services for each participant
    - Except participants over 62 or with physical or developmental disabilities
    - Reduced by the amount of a participant's employment

Resource for more detail and ideas

Street Outreach

…for people experiencing unsheltered homelessness

- CoC grant budget may include:
  - 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;
  - publicizing the availability of the housing and/or services provided within the geographic area covered by the Continuum of Care; and
  - Other eligible supportive services.

Street Outreach

…for people experiencing unsheltered homelessness

- HUD requires a commitment to "cooperate, assist, and not interfere or impede with law enforcement to enforce local laws such as public camping and public drug use laws"

- Local scoring will look for an approach that protects and prioritizes the trust and safety of unsheltered residents

Resource for more detail and ideas

Supportive Services Only

…for people experiencing homelessness

Provides supportive services not tied to housing assistance

- Grant recipient may **not** also provide housing or housing assistance
- Participant must be unhoused at enrollment
- Participant may move into housing during enrollment

Resource for more detail and ideas

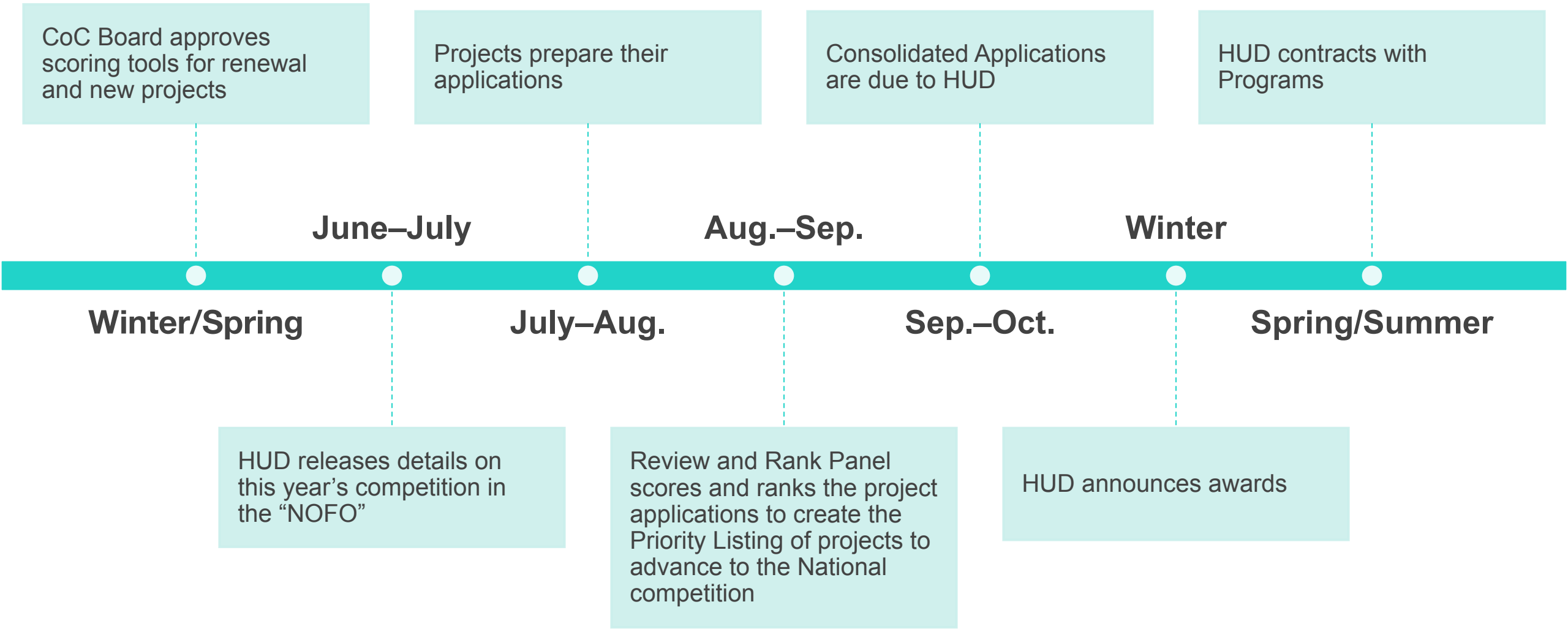
Eligible Supportive Services

- Annual Assessment
- Moving Costs
- Case Management
- Education Services
- Employment Assistance & Job Training
- Food
- Housing Search
- Legal Services
- Life Skills
- Outpatient Behavioral Health
- Outpatient Medical Care
- Outreach
- Transportation (public transit)
- Utility Deposits

2025 Competition Timeline

NOFO Funding Committee • NOFO highlights and scoring tool/process changes	Monday 11/24
LHCB Meeting • Approval of scoring tools and process	Thursday 12/1
Bidders Conference • Covering eligible project types, project requirements, and application process	Friday 12/5
Project Apps Due	Monday 12/15
R&R Panel	Monday 12/22
Appeals Due	Wednesday 12/24
Appeals Meeting	Monday 12/29
Final Ranked List Posted	Tuesday 12/30
E-Snaps Project Review	1/2 – 1/9

Typical NOFO Timeline



San Francisco Implications

Changes in project and community scoring may mean a less competitive application overall or required shifts in programmatic approach. New administration priority areas are worth more points, and less points are available overall (130 vs 200). Unclear and potentially conflicting NOFO language creates additional complexity.

Scoring Examples

- 16 points related to availability and requirement of treatment and recovery services
- 10 points for participation requirements for support services
- 10 points for reducing encampments
- 17 points relating to year over year PIT reductions

San Francisco Implications

High points of interest for the upcoming competition

Heightened risk to long standing projects and potential forced reallocation or transition of existing renewal projects to TH or SSO

NOFO language that is unclear or potentially creates compliance issues with known HUD guidance and regulations, VAWA, state and other funding requirements, and/or prior CoC program requirements

New required project eligibility thresholds that have unclear instances or triggers of enforcement, and look at past performance

San Francisco Implications

Example threshold criteria for new projects

(5) HUD reserves the right to verify past performance and evaluate the eligibility of a project application submitted during the CoC Program Competition for the following reasons:

(a) evidence that the project has previously or currently conducts activities that subsidize or facilitate racial preferences or other forms of illegal discrimination or conduct activities that rely on or otherwise use a definition of sex other than as binary in humans.

(b) evidence that the project operates drug injection sites or "safe consumption sites," knowingly distributes drug paraphernalia on or off of property under their control, permits the use or distribution of illicit drugs on property under their control, or conducts any of these activities under the pretext of "harm reduction."

Scoring Tools

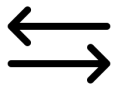
Scoring Tools Context

Some HUD requirements, but some local choice

- Each CoC is charged with creating a process and scoring tools to assess local projects for the Priority Listing

- Some scoring factors are based on requirements set forth by HUD, while others are heavily incentivized through points

- Outside of the required and heavily incentivized scoring factors, communities will generally have a small handful of local priorities they can fit in a scoring tool



- Scoring factors are somewhat flexible, with some being more flexible than others (due to how many points HUD gives to having them)

Scoring Tool Implications

The NOFO contains major changes for individual project application scoring and threshold criteria, and for community scoring through the consolidated application. Due to the strong incentives for current administration priorities, scoring tools need to change to be competitive for new and renewal funding.

Big Picture Scoring Tool Changes:

- 30% of CoC funds are for services or services funding and other formal partnerships is at least 50% of ARD
- Substance use on-site for at least 30% of projects and general availability of detox facilities, and substance use treatment projects in the community that require service participation
- 50% objective criteria and 25% of scoring related for returns/employment income/service participation requirements

Scoring Tool Implications

Each NOFO often has certain requirements/policy priorities that *should* be included somewhere in the competition process, but the NOFO does not always dictate where. This could be done through the ranking prioritization/policies, scoring tools, or communication elsewhere.

CoC Application Scoring

- CoC Board includes at least 3 elected officials, 1 business rep, and 2 law enforcement reps
- 20% reduction in the number of encampments
- Street outreach partners with law enforcement "to increase housing and service engagement"
- Camping and drug use prohibitions exist, and CoC cooperates with enforcement

New Project Scoring

There is a new project scoring tool for permanent housing and transitional housing projects, and a new project scoring tool for support services only projects, including street outreach. Initial drafts of the scoring tools went before the Funding Committee and mirror NOFO language and requirements.

New Project Scoring Tool Highlights:

- Scoring based on NOFO threshold criteria that must be met for HUD consideration
- Service requirements and 40 hours/week of services and/or employment per participant for TH projects, and focuses on exits to PH and increases in employment income for all projects
- Both new project scoring tools prioritize projects that can meet HUD's new requirements and priorities

Renewal Project Scoring

The renewal project scoring tool applies to existing PSH, RRH, and TH projects. Initial drafts of the scoring tools went before the Funding Committee and mirror NOFO language and requirements.

Renewal Project Scoring Tool Highlights:

- Meets HUD requirements of scoring based on employment income and returns to homelessness
- Prioritizes projects with more units
- No narratives for renewal projects to submit and data comes from SAGE, HUD's reporting platform for Annual Performance Reports (APRs)

Local Competition Process

The local process document dictates how the competition unfolds. It contains information about the review and rank process, appeals, and policies relating to the priority listing and ranking of individual projects.

Local Process Highlights:

- Updated timings and dates to be able to meet the shortened timeline for this year's competition
- Narrowed the appeals window and eligibility
- Updating policies relating to the priority listing, including changing positioning of certain project types placement on the ranked list
- Added policies to give some flexibility to align the ranked list with local resources

Questions and discussion