December 01, 2025

## HUD Notice of Funding Opportunity (NOFO)
## For FY 2025 Continuum of Care Funds Sonoma County Request for Proposals (RFP)

On November 13, 2025, the U.S. Department of Housing and Urban Development (HUD) issued the Continuum of Care (CoC) Notice of Funding Opportunity (NOFO) for 2025 Continuum of Care Funds.

Applicants are eligible to compete for a combined total of approximately $4.2 million in renewal FY 2025 Continuum of Care (CoC) project funding. In total, **$5,692,881** is **available for both existing renewals and new project** proposals. A major change in this year's competition is the introduction of community caps on permanent housing (PH). HUD now limits permanent housing to 30% of the CoC's Annual Renewal Demand (ARD), and Tier 1 is similarly restricted to 30%. Under this new cap, our **CoC is eligible to apply for only $1,278,542 in permanent housing projects** this year. Current permanent supportive housing renewals total $3,327,627, which means **$2,049,086, in existing PH renewal projects will be reallocated** within the local competition.

**Project applications are due in e-snaps by December 15ᵗʰ no later than 12pm**. **It is highly advised you submit your applications in e-snaps prior to this deadline.** As this date is also the HUD deadline, the application system will be overwhelmed and historically causes submission issues when used on the due date.

The following funds are available for NEW projects:

- A total of **$852,361** in CoC Bonus funding is competitively available for one or more permanent supportive housing projects (PSH), rapid rehousing projects (RRH), transitional housing (TH), Supportive Services Only projects (SSO), or HMIS projects.
- A total of **$365,625** in Domestic Violence (DV) bonus funding is competitively available for one or more projects serving victims of domestic violence; may only be used to create new SSO-Coordinated Entry (SSO Standalone is not eligible), Rapid Re-housing (RRH), and Transitional Housing (TH) projects.
- A total of **$2,049,086** is currently available in reallocated funding from permanent housing projects; this will be limited to SSO (including Coordinated Entry), TH, and HMIS project funding. In addition, this could increase if the evaluation process leads to the reallocation of any other underperforming projects.

Local application guidance for both new and renewal projects is attached to this Request for Proposals (RFP). Prospective applicants should review the Continuum of Care NOFO in full at: https://grants.gov/search-results-detail/360861

All HUD CoC Competition materials are located on their website using the following link. Please see section "FY 2025 Continuum of Care Competition": https://www.hud.gov/hud-partners/community-coc#coc3

Please also review the provisions of this local RFP in full, and note the local and final deadlines as follows:

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|---|---|
| Mandatory Bidders conference for all Projects (virtual meeting, login information included in Attachment 1) 10- 11:30am | December 4, 2025 |
| Technical Assistance Session: e-snaps and applications (In-person meeting, meeting location included in Attachment 1) 10am- 12pm | December 8, 2025 |
| Open Office Hours – (Drop in Assistance, virtual meeting, login information included in Attachment 1) 2-4 pm | December 11, 2025 |
| Local Submission for project applicants in e-snaps and supplemental scoring materials (**submit by 12pm**, earlier if possible due to e-snaps issues) | **December 15, 2025, by 12 pm** |
| Notice to providers on accepted, rejected or reduced projects by the CoC | December 30, 2025 |
| Finals Submission by CoC (5:00 PM PST) | January 12, 2026 |

**New CoC Program Organizations:** If you intend to apply as a new organization, you must register with SAM.gov as soon as possible to receive a Unique Entity Identifier (UEI) number. You will need the UEI number to create an account in e-snaps. This **step takes several weeks and was noticed by our office to complete on November 17, 2025**. If you missed this opportunity to register, it may be too late to apply for this round of funds as you need this number to register with the grant application system (e-snaps). https://sam.gov/

**Matching Requirements:** All projects funded through the CoC Program are required to provide a 25% match commitment of the total award requested minus any funds for leasing activities. Match can either be provided through in-kind or cash commitment. For more information on the requirements, please see the HUD CoC Virtual Binders: https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-match/match-requirements/

**Project Scoring Tools, Supplemental Project Applications, and Project Threshold Criteria forms**: Due to the timeline associated with this NOFO, these materials are currently not yet available as of the release of this local request for proposals. This information will be posted the week of December 1st and noticed widely. If you are not yet signed up to receive notices from our office, please do so by using the following link:
https://public.govdelivery.com/accounts/CASONOMA/subscriber/new?topic_id=CASONOMA_406

HUD has made significant changes to this year's CoC Program Competition. As a result, certain requirements may continue to be clarified through HUD's published FAQs, Application Detailed Instructions, Notices, and Q&A updates. The CoC reserves the right to issue addenda to this RFP if additional guidance becomes available. Applicants are responsible for reviewing all addenda, the CoC NOFO, HUD's Application Detailed Instructions, and ensuring their proposals reflect the most current information.

For further information contact:
Karissa White, Continuum of Care Coordinator: 707-565-4080 or Karissa.white@sonomacounty.gov
and Jynessa Lazzaroni, Community Development Program Specialist: 707-565-7067 or
Jynessa.Lazzaroni@sonomacounty.gov

# Contents

## Submission Timeline and Local Deadlines

In the annual Continuum of Care competition, all applications are submitted as a single, consolidated application through the Collaborative Applicant (County of Sonoma Department of Health Services). Thus, both local and final submission deadlines are needed. A competition for project funding will be conducted using HUD's electronic application system, e-snaps. **All new and renewal applications must submit the Supplemental Application Questionnaire and required attachments to the CoC Coordinator and complete the project application(s) in the HUD e-snaps system by December 15, 2025, no later than 12pm.** It is highly advised that you submit your e-snaps application before this due date due to technical issues with the system when a high volume of people use it.

The Sonoma County 2025 CoC Competition will be evaluated by the Homeless Coalition Board due to timing of the release of the NOFO. The Board will review all new and renewal projects for scoring and final approval of ranked projects submitted for funding during a special Board meeting in December (date TBD).

Between **December 16th through December 22nd,** the CoC Coordinator and Community Development Specialist will review all submitted project applications in e-snaps. During this time, applicants will have the opportunity to make technical corrections to project applications with staff prior to final submission to HUD.

Final scores and selections will be noticed to providers and posted on the Sonoma County Homeless Coalition's website no later than **December 30, 2025**:  https://sonomacounty.gov/health-and-human-services/health-services/divisions/homelessness-services/continuum-of-care/continuum-of-care-competition

The final local CoC Collaborative Application submission deadline is **on or before January 14, 2026**. The **2025 Continuum of Care Application Detailed Timeline (Attachment 1)** ensures the collaborative application is complete and ready for submission by the HUD final submission deadline of January 14, 2026 (8:00 PM EST).

## Threshold Criteria

All project applications must meet Project Eligibility Threshold criteria.  New projects are required to meet Project Quality Threshold criteria by project type. Please see NOFO pages 53 through 64 for details.

## Tiered Submission (Tier 1 and Tier 2)

The Sonoma County Homeless Coalition, representing the Continuum of Care, is responsible for prioritizing projects and placing all submitted projects into one of two tiers. Projects placed in Tier 1 will be funded first, from HUD's 2025 allocation of $3.9 billion. Projects placed in Tier 1 are virtually guaranteed funding, assuming they pass quality threshold and eligibility review by HUD. This year, HUD has determined that Tier 1 funding will be equal to 30% of the total Annual Renewal Demand (ARD). Tier

2 is the difference between Tier 1 and the maximum amount of renewal reallocation, and CoC Bonus funds that a CoC can apply for.

In addition, HUD has placed a 30% cap on permanent housing projects (PH) funded through this competition, which includes rapid rehousing (RRH) and permanent supportive housing (PSH) projects. HUD will not award any PH applications in the amount over $1,278,542. This means that several renewal PSH projects will not be granted their renewal award in the form of the PSH Component. All projects placed into Tier 2 are considered at-risk of losing their funds during the competition, especially this year with a highly competitive national process, new HUD priorities and 70% of funds being in Tier 2.

| New CoC Bonus Project Funding | $852,361 |
|---|---|
| New Domestic Violence (DV) Bonus Funding | $365,625 |
| Annual Renewal Demand (ARD) | $4,261,805 |
| Anticipated Tier 1 funding (ARD 30%) | $1,278,542 |
| Cap on Permanent Housing Projects | $1,278,542 |
| Reallocated Permanent Housing Renewal Funds (projects TBD) | $2,049,086 |
| Anticipated ARD at Risk (in Tier 2, ARD Minus 70%) | $2,983,263 |
| Continuum of Care Planning Grant | $213,090 |
| Total Possible CoC Award (including CoC Planning Grant and bonus funding) | $5,692,881 |

Tier 2 projects will be funded on a nationally competitive basis. HUD awards projects placed into Tier 2 competitively, depending on the amount of funds available. In 2025, DV bonus projects are not awarded in a separate process and will be awarded using the Tier 1 and Tier 2 process with all other ranked projects.

HUD will score all Tier 2 new and renewal project applications on a 100-point scale. Projects will be conditionally selected in order of highest to lowest score. Points are assigned as follows:

1. **CoC Score (up to 50 points).** Points are awarded in proportion to the CoC's score on its CoC Collaborative Application.
2. **CoC Project Ranking (up to 40 points).** Points are based on the CoC's ranking of the project. **Service Participation (up to 10 points).** Points are awarded to projects that include supportive service participation requirements based on individual needs, documented in occupancy agreements or comparable documents.

Sonoma County may place one or more projects either fully or partially into Tier 2. The local policy for making such decisions is located within this RFP, Attachment 4- Sonoma County Homeless Coalition – Process for Making Cuts: FY 2025.

At this point, there is currently $2,049,086 set for reallocation of renewing PSH projects. Some projects may option to transition their grant to a Transitional Housing (TH) model, please see section Transition

Grants for more detail. Historically the CoC has placed HMIS and SSO Coordinated Entry grants in Tier 1 for automatic funding for mandated system supports. This year, these projects will be ranked with others with Tier 1 only being 30% with a final decision by the Continuum of Care Board based on staff recommendations.

## Reallocation

The HUD reallocation process allows CoC's to fund new projects by transferring all or part of funds from any existing CoC grant to create a new project. This process is either voluntarily initiated by the current grant recipient or initiated through a decision approved by the Homeless Coalition Board due to a project no longer meeting the needs of the Homeless Coalition or due to poor performance.

**This year due to the permanent housing cap, reallocation will be required for a number of PSH renewing projects**.

Renewing applicants will submit the **mandatory Renewal/ Reallocation Questionnaire**, to confirm their intent to apply for all contracted and approved funds, and/or to offer funds for reallocation- including the intent to apply for a transition grant for their current award. As of the release of this RFP, selected PSH providers for reallocation have yet to be determined (other than those who have voluntarily reallocated their existing project).

HUD rewards communities that reallocate funding, which means reallocating funds will increase the chance of receiving funding for renewal projects, new bonus projects, and new projects created through reallocation. The Homeless Coalition has already met the requirement to score full points in this section of the Consolidated Application because we have reallocated at least 20% of our ARD in funding competitions from 2021-2025. However, projects placed in Tier 2 are still considered at risk of losing their funds as this is a nationally competitive process. The Homeless Coalition Board will approve placements in Tier 1 and Tier 2 during a special Homeless Coalition Board meeting in December (date to be determined).

## New Bonus Projects and New Transition Projects Created through Reallocation

New projects must submit a new project application in e-snaps and submit the required Supplemental Application Questionnaire and attachments outside of e-snaps **by December 15, 2025**, **by 12pm**. The Homeless Coalition Board will approve final project rankings at a special meeting in December (date TBD).

The CoC Bonus allows CoCs to use up to 20 percent of their Final Pro Rata Need (FPRN) to create one or more new project applications. In 2025, bonus funding is available in the amount of **$852,361 for the CoC Bonus, $365,625 for the DV Bonus**, and **$ 2,049,086 through PH reallocation** to meet the 30% cap on permanent housing (PH). New projects created are scored together with renewing projects. While new PH project applications may be submitted in this competition, the Homeless Coalition Board is unlikely to prioritize new PH projects due to the significant funding reductions to existing renewal PH projects. New Supportive Services Only (SSO) and Transitional Housing (TH) project applications are strongly encouraged and are expected to be more competitive within the available funding cap.

# New HUD Priorities by New Project Component

**Transitional Housing (TH):** HUD is seeking new Transitional Housing projects that can provide, or partner to provide, the supportive services necessary to help participants obtain and maintain housing. Applicants should demonstrate experience operating transitional housing or similar programs that help individuals and families exit homelessness within 24 months and should show a track record—or plan— to ensure that at least 50 percent of participants exit to permanent housing and at least 50 percent exit with employment income, as documented in HMIS or another approved data system. Projects should leverage additional public or private resources, including mainstream programs such as Medicaid, Medicare, SSI, and SNAP. Applicants must show that participants will be required to engage in supportive services in accordance with 24 CFR 578.75(h), supported by a service or occupancy agreement. HUD is also seeking projects that can provide up to 40 hours per week of individualized supportive services, with proportional reductions for employed participants and exemptions for those over age 62 or with qualifying disabilities.

**SSO-Street Outreach:** HUD is seeking new street outreach projects that can meet the following expectations. Projects should be able to supplement their activities with additional public or private resources, including mainstream health, social service, and employment programs such as Medicaid, Medicare, SSI, and SNAP. HUD is looking for outreach models that provide strong, individualized supportive services to people with histories of unsheltered homelessness, including those who are traditionally hard to engage. Applicants should demonstrate a history of effective collaboration with first responders and law enforcement to help individuals living in places not meant for human habitation access shelter, treatment, family reunification, transitional housing, or independent living, while also cooperating with local law enforcement in the enforcement of applicable laws. Applicants must also show experience delivering outreach services consistent with 24 CFR 578.53(e)(13) and a track record of successfully helping people transition from unsheltered locations into appropriate housing or services.

**Permanent Supportive Housing (PSH):** The project will provide appropriately sized units prioritized for elderly individuals and those with physical or developmental disabilities (24 CFR 582.5). Supportive services—such as case management, life skills, transportation assistance, and safety planning—will help participants obtain and retain permanent housing. For expansions of existing PH projects, the proposal includes increased and/or enhanced supportive services, including on-site services when appropriate. Participants will be required to engage in supportive services in accordance with 24 CFR 578.75(h), documented through a service participation agreement. The project will also leverage public and private resources, including mainstream benefits such as Medicare, Medicaid, SSI, and SNAP, to support long-term housing stability.

**Rapid Rehousing (RRH):** The project will provide tenant-based rental assistance to help individuals and families quickly achieve housing stability and self-sufficiency within 3–24 months. Supportive services— including case management, mental health and substance use treatment, and employment assistance— will ensure participants can obtain and maintain housing and successfully exit homelessness. The applicant has a demonstrated record of operating homeless programs with above-average employment income outcomes compared to the CoC. Participants will be required to engage in supportive services

consistent with 24 CFR 578.75(h), documented through a supportive service participation agreement. The project will leverage additional public and private resources, including mainstream benefits such as Medicare, Medicaid, SSI, SNAP, and employment programs, to support long-term stability.

**SSO Standalone:** The project provides essential supportive services to help participants exit homelessness and increase self-sufficiency. The recipient will complete annual assessments to ensure services continue to meet participant needs.  The project includes a clear strategy for engaging all eligible participants, including individuals with histories of unsheltered homelessness and those who are traditionally hard to engage in services. The project will also leverage additional public and private resources, including mainstream programs such as Medicare, Medicaid, SSI, SNAP, and other community supports. This component type is not permitted to provide services to individuals who have been housed, rather in unsheltered or sheltered situations (e.g., street outreach, day centers, emergency shelter).

For more information regarding HUD CoC Program Project Components, please refer to 24 CFR 578.37.

HUD CoC Program Supportive Services Only (SSO) or Housing Project tool: https://files.hudexchange.info/resources/documents/coc-program-sso-housing-component-decision-tool.pdf

## Bonus Projects
Eligible CoC Bonus projects include:

- Permanent Supportive Housing (PSH) projects that serve 100% chronically homeless or meet the requirements of DedicatedPlus.
    - New: must serve elderly or physically disabled individuals (not including substance use disorder)
- Permanent housing - Rapid Re-Housing Projects (RRH) serving persons who qualify as homeless under paragraphs (1), (2), or (4) of 24 CFR 578.3 or Section 103(b) of the McKinney-Vento Homeless Assistance Act
- Supportive Services Only (SSO) Standalone–services to provide services to individuals and families primarily residing in places not meant for human habitation either through outreach, day centers, or emergency shelter.
- SSO Coordinated Entry (CE) project to develop or operate a Coordinated Entry system.
- Transitional Housing (TH) projects that serve persons who qualify as homeless under paragraphs (1), (2), or (4) of 24 CFR 578.3 or Section 103(b) of the McKinney-Vento Homeless Assistance Act;
- Dedicated HMIS project for the costs at 24 CFR 578.37(a)(4) that may only be carried out by the HMIS Lead, which is the recipient or subrecipient of an HMIS grant and is listed on the HMIS Lead form in the CoC Applicant Profile in e-snaps.
- Expansion to add funds to an eligible CoC Renewal or DV Renewal.

Eligible Domestic Violence (DV) Bonus:

Population to be served are individuals and families of persons experiencing trauma or a lack of safety related to fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking that are defined as homeless under 24 CFR 578.3 or section 103(b) of the McKinney-Vento Homeless Assistance Act.

- PH-RRH
- TH
- SSO CE project to implement policies, procedures, and practices that equip the CoC's coordinated entry to better meet the needs of individuals and families of persons experiencing trauma or a lack of safety related to fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking.

Each CoC may only submit one new SSO-CE DV Bonus project; however, there is no limit to the number of TH projects and PH-RRH projects CoCs may apply for, provided each application is for at least $50,000.

Additional requirements of Bonus Projects (please refer to federal NOFO for all details):

- Bonus projects may include expansion of existing CoC-funded Projects.
- Project applicant does not have any certain open monitoring Findings or a history of slow expenditure of grant funds (e.g., funds left unspent at contract year-end).
- The type, scale, and location of the housing fit the needs of program participants.
- A specific plan is in place to ensure program participants will be individually assisted to obtain the benefits of the mainstream health, social, and employment programs for which they are eligible to apply.
- Applicant must agree to accept referrals solely from the CoC's Coordinated Entry System.
- Applicants require supportive services as a condition of participation.

Applicants for Bonus funds are strongly advised to review and understand the grant terms, especially those described in the NOFO.

## New Transition Grants

A Transition Grant allows an agency to convert an existing eligible CoC renewal project into a different eligible project type through the reallocation process. **This conversion happens over one year, and the original renewal project must be fully eliminated.** After the one-year transition period, the project can only apply for renewal under its new component type. Only current CoC Program recipients can apply for a transition. Any agency that will be applying for a transition grant must contact the CoC Collaborative ahead of the application submission date.

Eligibility and Timing

- Renewal grants that expire in Calendar Year 2026 may apply for a FY 2025 Transition Grant to change their component type.

- The new grant will start the day after the current grant ends.
- If the transition combines more than one grant, the start date will follow the earliest ending grant.

CoC Required Approval

- Applicants must have their Continuum of Care's approval.
- The new project must meet HUD's eligibility and quality thresholds.

Special Considerations

Participants currently housed in the PSH projects may not be eligible to remain if the project transitions to TH, as HUD requires individuals to meet homelessness eligibility criteria prior to entry into TH. CoC is awaiting further HUD guidance on whether existing residents could be grandfathered into the new project and subsequently begin the 24-month maximum length of stay allowed under TH.  Providers considering a Transition Grant to transform a PSH site should talk with other funders to see if it is permissible for the project to shift models.

## Renewal Projects

Per HUD guidance, renewal projects will be assigned a priority number based on the results of project evaluations conducted by the Homeless Coalition Board. The highest performing/highest need projects will be placed at the top of the project listing, and the lowest performing/ lowest need projects will be placed at the bottom of the listing. This year, a total of 70% of our ARD is at risk with a cap of 30% for Permanent Housing projects, meaning several renewal projects will either lose funding or be granted a transition grant to change component types. When making the decision to prioritize which renewal projects to fund with the 30% cap, the Homeless Coalition Board may make these determinations based on overall score of the project, community needs, ability to manage HUD funding and adapt to new HUD priorities.

Renewal projects supporting required system infrastructure, such as HMIS and Coordinated Entry renewals, may not be automatically prioritized into Tier 1 this year due to the limited amount of funding allocated to Tier 1 in 2025. The Homeless Coalition Board will make the determination on where to place these projects in the ranking, with the understanding that these projects were previously placed into Tier 1 as system mandates and will have different outcomes when compared to projects serving participants.

A chart showing approved summary budgets for all Sonoma County CoC renewal projects is included as Attachment 2.

## Administrative Expenses

In this funding cycle, both new and renewal project applicants may claim up to 10% of the CoC project budget, for administrative expense.

## VAWA Budget Line Item

New projects can include these costs in their proposed budgets; existing projects can add them by expanding or reallocating up to 10% of funds from one eligible activity to the VAWA costs line item. Activities related to emergency transfers and VAWA confidentiality compliance are eligible. VAWA costs are not subject to CoC's administrative cost caps.

Funds can be utilized in the following ways:

Emergency Transfer Costs: moving costs; travel costs; security deposits; utilities; housing fees (application, broker, etc.); case management; housing navigation; and safety technology (e.g., security systems).

VAWA Confidentiality Compliance Costs: monitoring and evaluating compliance; developing corrective actions; program evaluation; training on confidentiality; reporting on compliance; protecting survivor information; and staff time for adherence.

## Mandatory Bidder's Conference

A **Mandatory Bidder's Conference for Renewal and New Projects** will be held virtually on **Thursday, December 04, 2025, from 10:00 – 11:30 am**. The Bidder's Conference will address Continuum of Care funding regulations, changes in HUD priorities, funding caps, transition grants, and options for using available funds.

Virtual meeting login information is located on **Attachment 1 – 2025 Continuum of Care Application Detailed Timeline**, and will be posted on our website using the following link: https://sonomacounty.gov/health-and-human-services/health-services/divisions/homelessness-services/resources/continuum-of-care-competition

## Local E-snaps Submission Deadline (New and Renewal Projects)

All projects approved for submission—new bonus and reallocation projects, and all renewal projects—must be **submitted in e-Snaps by 12:00 p.m., Monday, December 15, 2025**.

**Please note, it is recommended you work on submitting your project prior to the submission deadline as the more people using the system nationally, the more likely it is to have issues.**

If you are brand new to e-snaps, please ensure you have registered for a new account, and register your organization using the assigned UEI number. This should be completed prior to the technical assistance session. Please see the e-snaps help page "Getting started in e-snaps." https://www.hudexchange.info/programs/e-snaps/

## Materials to Be Submitted to the Homeless Coalition (New & Renewal Projects)

In addition to the e-snaps submission, new and renewal agencies must submit the following documents:

- Applicant's most recent fiscal audit, with accompanying management letter.
- Supplemental Application Questionnaire

- 2025 Project Eligibility Threshold Criteria
- 2025 Project Quality Threshold Criteria (by project type)
- Project Application- e-snaps submission

**Please submit the above materials** to the CoC Coordinator **by 12:00 pm December 15, 2025,** by email to Karissa.white@sonomacounty.gov and the Community Development Specialist Jynessa.Lazzaroni@sonomacounty.gov.

Applicants may deliver required electronic documents on a flash drive, by the same deadline to Sonoma County Continuum of Care, c/o Sonoma County Department of Health Services, 1450 Neotomas Ave, STE 200, Santa Rosa CA 95405, Attention: Jynessa Lazzaroni.

**Note, electronic submission is highly preferred.**

## New and Renewal Project Scoring

The scoring schema is organized into the following areas (total points: 100):

- HUD's System Performance Measures and Use of Objective Scoring Criteria
- Use of the Coordinated Entry System
- Incorporation of individuals with lived experience of homelessness
- Project Narrative/Design
- Mainstream benefits and other assistance
- Commitment to Supportive Services Requirements
- Coordination with Housing and Healthcare Providers
- Project Readiness, Budget, Cost Effectiveness, and Financial Health
- Organizational Capacity & Experience
- HMIS Data Quality and Timeliness

This schema is designed to maximize the chances of Tier 2 funding for bonus, transition and renewal projects being awarded. **All new and renewal projects must complete and submit the Supplemental Application Questionnaire which addresses key scoring criteria. Please note, this is a supplemental document, and all projects must still complete the project application in the e-snaps system.**

## New and Renewal Project Rating and Ranking

New and renewal projects will be scored by the Homeless Coalition Board during a special meeting in December (date TBD).

Final project priorities will be announced through the Sonoma County Homeless Coalition Listserv and posted on website: https://sonomacounty.gov/health-and-human-services/health-services/divisions/homelessness-services/continuum-of-care/continuum-of-care-competition

Letters will be sent to all project applicants by **December 30, 2025**, to communicate whether projects are accepted, reduced, or rejected and their priority placement. Please note, if the new project is accepted by the Homeless Coalition this does not mean that it is approved for funding. HUD will

announce the confirmed 2025 awards for the competition likely midyear in 2026 due to the delays with this NOFO.

## Appeals

Due to necessary technical review, rating and ranking, and the extremely short timeline before final submission, the Homeless Coalition Board's selection of projects to be included in the Sonoma County Consolidated CoC Application will be final.

Consistent with HUD rules, an organization may appeal the Homeless Coalition Board's decision not to include it in the Sonoma County Consolidated CoC Application and submit a solo application to HUD, if that application is submitted by the competition deadline of January 14, 2026. Applicants appealing this decision should reference the CoC NOFO for details on types of appeals and the process to submit a solo application (NOFO, page 116, section *D. Debriefing and Appeals*).

If HUD finds that the solo applicant was not permitted to participate in the Continuum of Care funding process in a reasonable manner, then HUD may award the grant to that solo applicant and may direct the Sonoma County Homeless Coalition to take remedial steps to ensure reasonable participation in the future. HUD may also reduce the consolidated award to the Sonoma County Homeless Coalition.

## Technical Assistance Session and Office Hours- New and Renewal Project Applicants

Technical Assistance Session
A **Technical Assistance Session on the e-snaps electronic submission system and application review** will be held in person, at the Sonoma County Department of Health Services on **Monday, December 8th from 10:00 am- 12:00 pm**. It is highly recommended that you bring your laptop with you so staff can walk through opening your application in the system.

**New applicants to the CoC Program should create an e-snaps user account and register their organization prior to this session.** New applicants must have obtained a Unique Entity Identifier (UEI) number through the SAM.gov registration prior to this session. As noticed from our office on November 17th, sam.gov registration takes several weeks to process. **You will need an active UEI number to create your organizational profile in e-snaps.**

See instructions checklist to getting started in e-snaps:
https://files.hudexchange.info/resources/documents/Checklist-to-Get-Started-in-e-snaps.pdf

E-snaps 101 Toolkit: https://www.hudexchange.info/resource/6170/esnaps-101-toolkit/

Meeting address, date and time for this TA Session is listed on Attachment 1- 2025 Continuum of Care Application Detailed Timeline. Technical assistance sessions are open to all applicants (new or renewal).

This training will focus on basic e-snaps navigation, Project Applications, and attachments; applicants should have access to the e-snaps system while participating in the meeting. Please make sure you login

to your account prior to the session so you are not locked out and having issues accessing your account during the live session. E-snaps information: https://www.hudexchange.info/programs/e-snaps/

Those with e-snaps experience are expected to assist newer applicants in this collaborative application. If you do not need help accessing your application, this session is not required. HUD provides detailed navigational instructions for all project types which should be used when working in e-snaps.

Drop-in Office Hours
CoC staff will also be holding optional drop-in Office Hours to assist with any questions or issues with the e-snaps system. **Office hours will be held virtually on December 11th from 2– 4 pm.** The link to the virtual meeting login information is located in Attachment 1. **However, if there are any technical issues at any point between the Technical Assistance session and open office hours, please contact staff as soon as possible to help resolve any issues.**

The published meetings may be the only times staff can provide assistance prior to technical corrections, and it is strongly recommended that those preparing applications attend.

If applicants attend the TA sessions and are still experiencing difficulties, they should contact the Continuum of Care Coordinator, Karissa White, for additional assistance at Karissa.white@sonomacounty.gov   or by phone at 707-565-4080. Please ensure that the Community Development Specialist, Jynessa Lazzaroni, is also copied in communications to ensure your questions are answered as soon as possible at Jynessa.Lazzaroni@sonomacounty.gov .

## Questions

Questions may be directed to the Continuum of Care Coordinator, Karissa White, at Karissa.white@sonomacounty.gov   or by phone at 707-565-4080 and the Community Development Specialist, Jynessa Lazzaroni, at Jynessa.Lazzaroni@sonomacounty.gov . **Note, including both emails will expedite a response from staff.**

## Recommended Steps

Potential applicants are urged to take the following steps as soon as possible:

1. Register with the federal government's System for Award Management (SAM) at and Obtain Sam.gov registration and a UEI number: Applicants must provide a valid UEI number to gain access to the application.
2. To receive up to date information about the 2025 Continuum of Care NOFO, join a listserv at www.hudexchange.info/mailinglist/ .
3. All local communications about the competition will be posted on the Lead Agency's website at: https://sonomacounty.gov/health-and-human-services/health-services/divisions/homelessness-services/resources/continuum-of-care-competition
4. Set up an individual user profile on the e-snaps electronic application site: https://esnaps.hud.gov/grantium/frontOffice.jsf

a. Instructions to create a profile in e-snaps:
   https://files.hudexchange.info/resources/documents/Create-an-e-snaps-User-Profile.pdf

5. **New CoC Organizations Registering**: Once you have obtained a UEI number and registered with SAM.gov, set your organization up on the e-snaps site on the Applicants tab. This is comparable to the SF-424 cover sheet submitted with every other federal grant; step-by-step instructions will be posted on HUDs website: https://www.hud.gov/hud-partners/community-coc

   Instructions to access your profile: https://www.hud.gov/sites/dfiles/CPD/documents/CoC/FY25-CoC-Project-Applicant-Profile-eSNAPs-Navigational-Guide.pdf

## Resources

HUD guides for applications: https://www.hud.gov/hud-partners/community-coc

*Note- there is a guide for renewal project applications and new project applications. The detailed instructions tell you how to answer the questions and what they mean, whereas the navigational guides give you step by step instructions on how to complete your application in e-snaps.*

The federal 2025 Continuum of Care NOFO is available at:
https://www.hud.gov/sites/dfiles/CPD/documents/FY2025-CoC-NOFO-FR-6900-N-25.pdf

Notice on Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing and Recordkeeping Requirements for Documenting Chronic Homeless Status, at: https://www.hudexchange.info/resource/5108/notice-cpd-16-11- prioritizing-persons-experiencing-chronic-homelessness-and-other-vulnerable-homeless-persons-in- psh/

The Continuum of Care Program Interim Rule can be found at:
https://www.hudexchange.info/resource/2033/hearth-coc-program-interim-rule /

E-snaps, the online submission system, can be accessed at:
https://esnaps.hud.gov/grantium/frontOffice.jsf

A series of useful tutorials on the e-snaps electronic submission system are at:
https://www.hudexchange.info/programs/e-snaps/

CoC Program Toolkit - Introduction to the CoC Program:
https://www.hudexchange.info/programs/coc/toolkit/

Sonoma County Homeless Coalition Local CoC Competition Page:

https://sonomacounty.gov/health-and-human-services/health-services/divisions/homelessness-services/resources/continuum-of-care-competition

HUD's CoC Virtual Binders: https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/?utm_source=HUD+Exchange+Mailing+List&utm_campaign=aa5cc12e9b-New_CoC_ESG_Binders_HUDX_6_16_21&utm_medium=email&utm_term=0_f32b935a5f-aa5cc12e9b-19343217

## Attachment 1- 2025 Continuum of Care Application Detailed Timeline

| Date | Action |
|---|---|
| **Nov. 13** | NOFO for FY 2025 Funds Released |
| **Dec. 1** | Local Request for Proposals issued |
| **Dec. 4** | **MANDATORY Bidder's Conference for All Projects- virtual**<br>10:00 am -11:30 am, Virtual Zoom meeting, login information<br>listed below Zoom Meeting Link:<br>https://sonomacounty.zoom.us/j/82627938904?pwd=dSIhCNOyipbTmHnLd3eUa9s4jEZxGf.1<br>Meeting ID: 826 2793 8904<br>Passcode: 016799<br>Phone: +1 669 900 9128 US |
| **Dec. 8** | **Technical Assistance Session for Applicants: Introduction to *e-snaps and Applications in e-snaps review*** (in person, **please bring your laptops** *if you would like assistance walking through opening your application*)<br>10:00 am – 12:00 pm<br>Location:<br>Sonoma County Department of Health Services – Santa Rosa Room (second floor)<br>1450 Neotomas Ave., Santa Rosa, CA 95405<br><br>*This is a collaborative application. Those with e-snaps experience are expected to assist newer applicants. New applicants will need to have an active UEI number and SAM registration prior to the session. Your organization must have an active System for Award Management (SAM) registration to create an organization profile in e-snaps.*<br>*https://sam.gov/content/home* |
| **Dec. 11** | ***2025 CoC Competition Open Office Hours (optional- drop-in session)***<br>10:00am - 12:00 pm, Virtual Zoom meeting, login information<br>listed below<br>Join Zoom Meeting<br>https://sonomacounty.zoom.us/j/83611447799?pwd=38CD04aNB10L60FZhhlRhZEluXh8De.1<br>Meeting ID: 836 1144 7799  Passcode: 774519<br>Phone: +1 669 444 9171 US |
| **Dec. 15** | **New and Renewal Project Supplemental Materials and Application(s) e-snaps due, by 12:00 pm** |
| **Dec. 16- Dec. 22** | Technical review/corrections, e-snaps priority ranking & Consolidated Plan certifications |
| **Dec. Date TBD** | Homeless Coalition Board Approval of New and Renewal Projects in Final Priority Listing |

| | |
|---|---|
| **Dec. 30** | Publication of new project selections and Priority Listings *(earlier if possible)* on the Sonoma County CoC Competition website at: https://sonomacounty.ca.gov/health-and-human-services/health-services/divisions/homelessness-services/continuum-of-care/continuum-of-care-competition |
| **Dec. 30** | Notice of new and renewal project acceptance, reduction, or rejection to applicants (earlier if possible). |
| **Jan. 12** | Public Posting of full Consolidated Application https://sonomacounty.ca.gov/health-and-human-services/health-services/divisions/homelessness-services/continuum-of-care/continuum-of-care-competition |
| **Jan. 14** | Collaborative Applicant: Final Submission of CoC Application and Priority Listing Due in e-snaps (no later 5:00 PM) |

## Attachment 2- Renewal Projects Budgets

| Agency | Project | Project Type | Total Award |
|---|---|---|---|
| Buckelew Programs | Sonoma SCIL 02.01.25-01.31.26 | PSH* | $292,397.00 |
| Sonoma County Community Development Commission | Renewal Rental Assistance - Persons with HIV/AIDS | PSH | $721,918.00 |
| Community Support Network | Stony Point Commons | PSH | $64,872.00 |
| Committee on the Shelterless (COTS) | Community Based Permanent Supportive Housing | PSH | $322,603.00 |
| West County Community Services | Mill Street Supportive Services | PSH | $107,625.00 |
| Catholic Charities of the Diocese of Santa Rosa | Catholic Charities Permanent Supportive Housing Santa Rosa 2 | PSH | $846,100.00 |
| Community Support Network | CSN Sponsor-Based Rental Assistance | PSH | $335,611.00 |
| County of Sonoma | Homeless Management Information System (HMIS) Expansion | HMIS | $348,561.00 |
| County of Sonoma | Coordinated Intake Expansion Project | SSO/CES | $585,617.00 |
| Society of St. Vincent de Paul Sonoma County | St. Vincent de Paul Commons PSH | PSH | $327,166.00 |
| West County Community Services | Elderberry Commons | PSH | $309,335.00 |
| County of Sonoma | CoC Planning Project Application | Planning | $207,734.00 |

To access detailed budgets for each project, please review the HUD Grants Inventory Worksheet:
https://share.sonoma-county.org/link/i4UE-XlBI4g/

# Attachment 3- What's New in FY 2025 Competition

For full details on all changes in the FY 2025 CoC Competition, please review the full federal NOFO and the detailed instructional guides listed on the HUD website. These changes will be reviewed at the Technical Assistance sessions on December 4th and 8th. HUD has not yet released the New, Changes and Highlights for the Competition document. Additional information will be provided as an addendum to this RFP as more HUD guidance is released.

Competition Guide Resource Page: https://www.hud.gov/hud-partners/community-coc

Top 10 NOFO Changes

1. **Only 30 percent of a CoC's funding is protected in Tier 1, down from 90 percent in past years.** This is the most significant structural change in a decade. With 70 percent of funding now fully competitive and tied to Merit Review scores and project ranking, even small scoring differences could lead to major funding losses.

2. **Permanent Housing (PSH, RRH, Joint TH–RRH) is capped at 30 percent of ARD.** CoCs must shift funding from existing permanent housing projects that exceed this cap toward new projects that are aligned with the administration's priorities, particularly transitional housing with high service requirements. New Joint TH–RRH projects are no longer eligible.

3. **All projects except for CoC Planning/UFA must compete, including YHDP renewals and DV Bonus**. These projects must be ranked and scored in Tier 2 with no special protections, increasing competition across the entire portfolio.

4. **New prohibitions can disqualify any project.** HUD may reject projects in Tier 1 or 2 for engaging in racial preferences, using a definition of sex "other than binary," or conducting activities viewed as "harm reduction." These provisions create significant new compliance risks.

5. **HUD's new national priority centers on treatment, recovery, and required services.** HUD favors projects with onsite substance use treatment, required service participation, sufficient treatment bed capacity, and 24/7 detox or inpatient access. Required services now boost scoring.

6. **HUD elevates "public safety" as a major scoring factor.** CoCs must show laws prohibiting camping and illicit drug use, enforcement protocols, cooperation with law enforcement, use of involuntary commitment standards, and SORNA implementation. These factors elevate the influence of local criminalization policies.

7. **New project requirements reshape TH, RRH, PSH, and Street Outreach.** New transitional housing must provide 40 hours/week of services; new RRH must show strong employment outcomes and require services; new PSH must serve elderly or physically disabled individuals (not including substance use disorder) with required services; and new street outreach must demonstrate strong law-enforcement partnerships.

8. **Merit Review replaces prior CoC scoring and shifts weighting.** The 130-point system includes 9 points for Project Capacity/Ranking, 40 for System Performance, and 81 for Coordination & Engagement, plus 19 bonus points. Service requirements feature prominently throughout.

9. **Tier 2 scoring now favors projects with required services.** Tier 2 projects receive up to 100 points based on Merit Review scores, local ranking, and up to 10 points for requiring services—giving mandatory-service models a clear advantage.

10. **HUD's expanded Risk Review increases the likelihood of project rejection.** 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.

New FY 2025 Policy Priorities

**Ending the crisis of homelessness on our streets.** Citing a California Policy Lab study from 2019, HUD claims that 75% of people experiencing unsheltered homelessness report a substance use disorder (SUD) and 78% report a mental health condition. Therefore, CoCs should direct resources towards outreach, intervention, and assistance consistent with Executive Order on "Ending Crime and Disorder on America's Streets."

**Prioritizing Treatment and Recovery.** CoCs should prioritize projects that provide treatment and services needed to recover and regain self-sufficiency, including on-site treatment and participation requirements in services.

**Advancing Public Safety.** CoCs should cooperate with law enforcement to advance public safety. HUD cited the Supreme Court decision in Grants Pass v. Johnson as upholding the authority of local governments to prohibit public camping.

**Promoting Self-Sufficiency.** Highlighting that one of the primary purposes of the COC program is to optimize self-sufficiency, HUD indicates that CoCs should prioritize projects that help lead to long-term economic independence for individuals and families. This would allow them to exit homelessness and prevent future returns to homelessness.

**Improving outcomes.** CoCs should review all eligible projects to determine their effectiveness in reducing homelessness and prioritize those that promote self-sufficiency, increase employment income over government assistance, and promote treatment and recovery.

**Minimizing trauma.** CoCs should encourage the use of trauma informed care, ensure safety of program participants, and access to 'safe, single-sex spaces' for women.

New/Updated Project Applicant Certifications and Expectations

Updated **HUD Applicant and Recipient Assurances and Certifications (HUD-424B)** that includes a certification that the applicant will not use federal funding to promote diversity, equity, and inclusion mandates, policies, programs, or activities that violate any applicable federal anti-discrimination laws.

New **Certification of Need and Compliance with Housing Quality and Habitability Standards** in which the Collaborative Applicant must certify a demonstrated need for all PH projects included in the Renewal Project Listing and that they all comply with program requirements, including HQS or Habitability Standards (whichever is applicable).

New **Certification for Opportunity Zone Preference Points** if the CoC is requesting up to 4 Opportunity Zone preference points.

HUD Project Review

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

1. 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.

2.  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."
3.  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:
    a.  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).
    b.  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.
    c.  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.
    d.  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.

## Merit Review

Merit Review (previously CoC Scoring Criteria) removes or significantly adjusts previous criteria and adds new criteria, with a total of 130 points available across 3 rating areas: Project Capacity, Review, and Ranking; System Performance; and CoC Coordination and Engagement. In addition, there are 19 bonus points available (15 for CoC Mergers and up to 4 for Policy Initiative Preference Points).

## Risk Review

HUD's review of applications has always included an assessment of risk and past performance. In FY2025, this "Risk Review" incorporates the same criteria as in years past (i.e., financial controls, effective management systems, results of audits) but adds two new criteria

- Other public sources such as newspapers, Inspector General or Government Accountability Office reports or findings, or other complaints that have been proven to have merit
- History of subsidizing or facilitating activities that conflict with the purposes of the NOFO

## Awards Made Under this NOFO

Will not be used to conduct activities that subsidize or facilitate racial preferences or other forms of illegal discrimination, including activities where race or intentional proxies for race will be used as a selection criterion for employment or program participation; or conduct activities that rely on or otherwise use a definition of sex as other than binary in humans.

Will not be used to fund, promote, encourage, subsidize or facilitate the use of illicit drugs.

Will not be used to fund any project, service provider, or organization that 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."

# Attachment 4- Homeless Coalition Reallocation- Process for Making Cuts FY25

To create a pool of reallocated funds for new project opportunities, the Sonoma County Homeless Coalition will use its competition process to implement both voluntary and involuntary reallocations. Additional voluntary reductions may also be made during the NOFO period if new project opportunities emerge.

This year's reallocation process will be notably different. HUD has established a 30% cap on Permanent Supportive Housing (PSH) funding, which requires the CoC to reallocate a total of $2,049,086 currently committed to PSH projects. As a result, significant reallocation will be necessary within this funding competition to comply with HUD's requirements and to align resources with community needs.

1. **Reallocation Based on 2025 NOFO Requirements**

Prior to the release of this RFP, local renewal projects were sent a Reallocation questionnaire that allowed for the project to do the following:

- Confirm they will be applying for the Renewal award for their PSH project;
- confirm they will be reallocating all or part of their existing PSH project and no longer want to receive HUD funds; or
- confirm they wish to reallocate the PSH project and apply for a transition grant.

This reallocation process is completely voluntary. However, the CoC can only submit the amount of applications for PH that is permitted through the cap of 30% of the CoC's total Annual Renewal Demand. Projects exceeding this amount will be reduced or rejected dependent upon the order in which they are ranked by the Homeless Coalition Board.

2. **Reallocation via Project Evaluations**

The Sonoma County Homeless Coalition's CoC Competition Evaluation Workgroup was unable to meet to identify renewal projects that may be at risk for reallocation based on performance. This challenge was compounded by the delayed release of the NOFO and the fact that CoCs were under the impression—based on last year's announcement—that HUD would operate on a two-year NOFO cycle. As a result, the Homeless Coalition Board will need to determine any potential reallocations during the priority rating and ranking session.

Project scoring will be based on unmet housing need, alignment with Sonoma County Homeless Coalition Strategic Plan goals, performance on HUD measures, and grant management. Because the scoring framework places significant weight on unmet housing need—and given the shortened timeline of this year's competition and the substantial reallocation requirements—the Board will be responsible for determining project rankings and identifying any reallocations from underperforming to higher-performing projects. Please note that there will not be sufficient time to solicit or accept new project applications if the Board makes reallocation decisions during the scoring meeting. Determination on any cuts will be made during a special meeting of the Homeless Coalition Board in December (date TBD).