



FY 2025 CoC Program CoC Application Process

CONTRA COSTA COC APPLICATION PROCESS

This document is a tool to support the fair, transparent, and objective administration of the HUD Continuum of Care Program Competition process. The following sections outline the Council on Homelessness's policies as related to designing, operating and following a collaborative local process for the development of HUD Continuum of Care Program applications and approval of submission of applications as required by C.F.R. 578.9.

2025 Late Application Policy: given this year's competition time constraints, late applications will not be accepted. Incomplete applications cannot be cured for the CoC Review and Rank Panel scoring process but must be corrected prior to HUD submission.

Section 1. APPLICATION OVERVIEW

The Council on Homelessness (Council) prepares and oversees the applications for funds administered by HUD under the HEARTH Act. The Council on Homelessness is designed to assist individuals—including unaccompanied youth—and families experiencing homelessness and to provide the services needed to help individuals move into transitional and permanent housing, with the goal of long-term stability. The Council's HUD CoC Program funds are granted annually based on a national competition following the release of a Notice of Funding Opportunity (NOFO). It is a primary responsibility of the Council to oversee the application for those funds.

Section 2. COLLABORATIVE APPLICANT

The Council designates Contra Costa Health - Health, Housing, and Homeless Services as the annual HUD CoC Program Collaborative Applicant. The Collaborative Applicant (or its designee) is responsible for leading and supporting all aspects of the annual HUD CoC Program application process, including submission of the Consolidated Application consisting of 1) the CoC Application; 2) the CoC's Priority List of Projects; and 3) all Project Applications.

The Collaborative Applicant may identify and designate a neutral third party to facilitate the CoC Program Competition, including facilitating the development of scoring tools, implementation of technical assistance, support drafting the CoC application, and administration of the project application review and ranking process.

Section 3. OVERVIEW OF PROJECT REVIEW PROCESS AND APPLICATION SUBMISSION TIMELINE



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Immediately after HUD's Continuum of Care Program Notice of Funding Opportunity (NOFO) is released, the Collaborative Applicant (or its designee) will coordinate and carry out all of activities needed to successfully submit an application on behalf of the CoC. The following is an overview of the local competition process and tasks for CoC Program application submission. The process and timeline are subject to change annually, depending on HUD's requirements as outlined in the NOFO.

- Funding Committee meets to discuss and approve scoring criteria for project applications
- Selection of non-conflicted Review & Rank Panelists
- Mandatory Technical Assistance Workshop held for current and prospective Project Applicants
- Project Applications are submitted through a designated portal
- Review & Rank Panel convenes to evaluate and score project applications
- Review & Rank Panel ranks projects on a Priority List and recommends projects for inclusion in the CoC Application for funding from HUD
- Priority Listing is publicized and appeals process opens for eligible project applicants
- If necessary, Appeals Committee convenes to make final decision on Priority Listing
- Council or designated Council representative approves the Priority Listing
- Collaborative Applicant drafts CoC Application
- Final Priority Listing, CoC Application, and Project Applications are made available for public comment
- Collaborative Applicant submits final Consolidated Application to HUD

Section 4. SCORING TOOLS

Prior to the NOFO release, the Council will request that the Funding Committee convene to design and/or revise scoring tools and any corresponding local application materials to assist in the CoC review and ranking of all renewal and new project applications. The Funding Committee reviews data and analytics from the local HMIS and Coordinated Entry System, year-over-year CoC project and funding information, funding and project opportunities and strategies available in the current HUD NOFO release, and local demographic trends. That data and information is then used to develop and update scoring tools for the purpose of effectively evaluating the current local need for subpopulation focuses and project and bed type, as well as project performance and impact.

The scoring tools will take into consideration both local and HUD priorities, including projects serving populations with severe needs and vulnerabilities, such as persons experiencing chronic homelessness, mental illness, substance use disorders, and survivors of domestic violence.

The scoring tools may also establish threshold criteria reflective of local and HUD priorities, which all project applications are expected to meet. This criteria may include factors such as coordinated entry and HMIS participation..



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The scoring tools will be finalized and approved by the Funding Committee and an ad hoc subcommittee of the Council.

Section 5. TECHNICAL ASSISTANCE

Upon HUD release of the NOFO, a third-party facilitator will schedule and announce a time and date for a Technical Assistance Workshop. These details will be distributed to the entire CoC.

All potential applicants must participate in the HUD CoC Program Technical Assistance Workshop. At the workshop, the third-party facilitator will present an overview of the HUD CoC NOFO, including details about available funding and any major changes in the application from previous years. Applicants will also be oriented to the process for reviewing and ranking applications, which will cover any supplemental local application materials, the scoring tool, and relevant dates and deadlines. Applicants will also have a chance to ask any questions about both the local and HUD application processes.

Throughout the CoC Program Competition technical assistance will be available to all project applicants. Technical assistance for new and returning project applicants is designed to:

- explain the application process, including use of the application submissions portal,
- explain the current year's funding opportunities, and
- provide training and support for prospective applicants to ensure eligible and competitive applications.

Section 6. PROJECT APPLICATIONS & SUBMISSION

Project applications are submitted online through a designated application portal.

The project applications mirror the new and renewal project scoring tools and solicit information necessary for the Review & Rank Panel to consistently score applicant responses using the objective criteria outlined in the tools. The application may include requests for quantitative and qualitative data. Typically, the applications require information related to: consistency with HUD and local priorities, agency capacity and readiness, project scope and design, and efficient use of funds.

Applicants complete the project applications typically within four to six weeks of the NOFO release (and generally not less than 30 days prior to the HUD NOFO submission deadline). Technical assistance is available to support projects with data entry and reviewing data for accuracy and completeness.

Incomplete applications cannot be cured for the CoC Review and Rank Panel scoring process but must be corrected prior to HUD submission.

Section 7. LOCAL REVIEW & RANK PROCESS

The next stage in the competition requires an evaluation of project applications. The Review and Rank Panel is responsible for conducting this evaluation and ranking process.



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A. PANEL MEMBERSHIP

The Council designates between three and five of its members to serve as CoC Review and Rank Panelists. CoC Review and Rank Panelists must be:

- Knowledgeable about homelessness and housing in the community and broadly representative of the relevant sectors, subpopulations, and geographic areas;
- “Neutral,” meaning that they are not employees, staff, or otherwise have a business or personal conflict of interest with the applicant organizations;
- Familiar with housing and homeless needs within Contra Costa County; and
- Willing to review projects with the best interest of homeless persons in mind.

To serve on the CoC Review and Rank Panel, members must:

- Sign a statement declaring that they have no conflict of interest and a confidentiality agreement; and
- Be able to dedicate time for application review and CoC Review and Rank Panel meetings as scheduled by the Collaborative Applicant.

Qualified, non-conflicted CoC Review and Rank Panel members are recruited and oriented to the local review and ranking process.

B. REVIEW & RANK METHODOLOGY

The CoC Review and Rank Panel members receive all local application and scoring materials and evaluate and score each program’s application.

Panel members are encouraged to individually review and pre-score applications using the scoring tools prior to the Review and Rank Panel meeting collectively. The CoC Review and Rank Panel meets to collectively evaluate each application.

2025 Review & Rank Methodology

In the FY2025 CoC NOFO Competition, Tier 1 can only include up to 30% of the CoC’s Annual Renewal Demand (ARD) – a major shift from previous years when Tier 1 covered 90% or more of the ARD. In 2025, HUD is also imposing a new limit on permanent housing (PH) projects for the CoC – no more than 30% of the CoC’s ARD can be utilized for permanent housing, which includes both Permanent Supportive Housing (PSH) and Rapid Rehousing (RRH). Renewal permanent housing projects not included in Tier 1 must reallocate their funding or transition the project to eligible project types (e.g., Transitional Housing, Supportive Services Only, or Street Outreach).



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To preserve as much permanent housing as possible under these new rules, the CoC will prioritize renewal permanent supportive housing (PSH) projects in Tier 1. Because RRH also counts towards the 30% PH cap, Tier 1 will focus solely on a shortlist or subset of PSH renewal projects. As a result, the CoC must reallocate a substantial portion of its renewal permanent housing funding to stay within HUD's new limits. As such, renewal PSH projects not included in Tier 1 and all renewal RRH projects must reallocate their funding or transition their projects to eligible project types (e.g., Transitional Housing, Supportive Services Only, or Street Outreach).

To implement these changes, the 2025 review and rank process will follow the steps below:

Step 1: To ensure a fair and strategic response to the 30% permanent housing cap and to support a balanced Continuum of Care (CoC) portfolio, the CoC will implement the following approach for all renewal projects in the upcoming competition cycle:

A. INDIVIDUAL RENEWAL PROJECT CONSULTATIONS

The CoC Lead Agency will meet with each renewal provider of PSH to review their current project structure, funding needs, performance, and long-term sustainability. These conversations will be used to:

- Assess whether the project is interested in transitioning to an alternative housing or service model;
- Identify opportunities to shift to other funding sources outside the CoC Program; and
- Develop a project-specific plan that aligns with the CoC's overall portfolio strategy.

B. 30% PERMANENT HOUSING CAP SHORTLIST DEVELOPMENT BASED ON PROVIDER INTENT

High-performing projects that express interest in transitioning to another project type, prefer to move to other eligible funding sources, or cannot continue operating as a renewal project with reduced funding, will be removed from the CoC's 30% PH cap shortlist for continued permanent housing funding consideration. These projects will instead receive transition planning support from the CoC Lead Agency to ensure continuity of services, staffing, and participant stability.

C. PARTIAL REALLOCATION REQUIREMENT FOR 30% PH CAP SHORTLIST PROJECTS

For the renewal projects that remain on the 30% PH cap shortlist and wish to continue operating as permanent housing projects within the CoC portfolio:

- The CoC will require that all shortlisted projects partially reallocate funds and share in the reductions to meet the 30% PH cap and to ensure balance and fairness across the portfolio; and
- The CoC Lead Agency will work with each provider to determine the appropriate reallocation percentage and support continuity planning.

Decisions regarding reallocation amounts for projects on the 30% PH cap shortlist are final and may not be appealed.

Step 2: Inform renewal project applicants about which projects are included – and which are not included – in the 30% PH cap shortlist. Renewal projects that are not included in the 30% PH cap shortlist may either:



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1. Reallocate funding and not submit a new project application,
2. Reallocate funding and submit a new project application, or
3. Apply for a transition grant to convert their current project to another eligible project type (e.g., Transitional Housing, Supportive Services Only, or Street Outreach project).

Projects and dollar amounts not included in the 30% PH cap shortlist are not eligible to submit a renewal application, and this determination is not subject to appeal.

Step 3: Hold a non-conflicted Rank and Review Panel to determine ranked order of projects in **Tier 2** based on scores and local policy. The following will be applied:

1. HMIS and CES will be auto-ranked at the top of Tier 2
2. The Review and Rank Panel will review new project applications and assign a score to them utilizing the corresponding scoring tool. The Review and Rank Panel may be asked to compare two different new project types. For example, comparing a new transitional housing project to a new supportive service only project. In these cases, the panel should use discretion, reviewing the score in addition to:
 - a. The number of people experiencing homelessness that will benefit from the service or project
 - b. The existing need in the community for the project
 - c. Project alignment with HUD and community priorities
3. Applicants with renewal projects that seek a transition grant to convert their current project to an eligible project type (e.g., convert a Permanent Supportive Housing project to a Transitional Housing, Supportive Services Only, or Street Outreach project), will receive priority over completely new projects.
4. To remain in alignment with HUD priorities new permanent housing projects (including PSH, RRH, or joint TH-RRH) will not be accepted in this year's competition.

Note that based on community priorities as defined in the scoring tools, the CoC Review and Rank Panel may determine whether any renewal project should be decreased or reallocated. Any funding captured from an existing project will be made available for reallocation to any project that meets the requirements in the NOFO application. See **Section 7** for further information on Reallocation.

Scoring results are sent to applicants with a reminder of the appeals process at least 15 days before CoC Application deadline. Appeals, if any, are considered in compliance with the Appeals Process detailed in **Section 9** below. Please note that in the 2025 competition the following decisions are final and not eligible for appeal:

- reallocation amounts for projects included in the 30% PH cap shortlist
- renewal projects excluded from the 30% PH cap shortlist

A final ranked project list (i.e., the Priority List) is submitted to the Council or the designated Council representative for review and approval. Upon approval, the Priority List is published.

The Collaborative Applicant collects all final Project Applications and submits them to HUD, along with the CoC Application and Priority List, as part of the CoC's Consolidated Application.

Section 7. REALLOCATION OF FUNDS



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HUD allows CoCs to reallocate funds from non- and/or under-performing projects to higher priority community needs that also align with HUD priorities and goals. The CoC Review and Rank Panel facilitates the reallocation discussion and process, in consultation with the CoC, the Council, the Collaborative Applicant, and the CoC Program recipients and subrecipients who may be impacted. The third-party facilitator may be asked to support community discussions and technical assistance around the strategic benefits or consequences of reallocation decisions. The Council or the designated Council representative must approve all final decisions about reallocation.

Section 8. USING ALL AVAILABLE FUNDS

The Collaborative Applicant and third-party facilitator will do everything possible to ensure that the community applies for all funds available to the CoC. Thus, if all on-time applications have been submitted and it appears that either: 1) the community is not requesting as much money as is available from HUD, 2) no bonus (or other special project as defined by HUD) projects have been submitted, or 3) there are reallocated funds available, then:

- The Collaborative Applicant and third-party facilitator will communicate with the Council, CoC, and other interested parties (all homeless service and housing providers in Contra Costa County) with details about the available funding.
- The Collaborative Applicant and third-party facilitator will provide technical assistance and guidance, as needed, to ensure applicants understand the funding requirements.
- Any additional amendments to project applications for these funds will be due as soon as possible after this communication is distributed, in compliance with CoC Program submission deadlines.

Section 9. APPEALS PROCESS

The Review and Rank Panel reviews all applications and ranks them for funding recommendations to HUD. Applicants may appeal the decision by following the process set forth below.

A. THE APPEALS COMMITTEE

The Appeals Committee will be comprised of up to four impartial members of the Council: up to three voting members and one non-voting member. The three voting members will not have participated in the original CoC Review and Rank Panel. The non-voting member must have been a member of the original CoC Review and Rank Panel.

No member of the Appeals Committee may have a conflict of interest with any of the agencies applying for CoC Program funding. All members of the Appeals Committee must sign conflict of interest and confidentiality statements. If there are insufficient Council members who qualify for the appeals committee, a member of the CoC may be designated by the Council to participate in the Appeals Committee.



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B. ELIGIBLE APPEALS

In the 2025 competition, the following decisions are final and not eligible for appeal:

- reallocation amounts for projects included in the 30% PH cap shortlist
- renewal projects excluded from the 30% PH cap shortlist

An applicant may be eligible to appeal the decision of the CoC Review and Rank Panel only if their project application:

- Is a new project rejected from inclusion into the ranked priority listing

To appeal, the applicant must demonstrate that:

- Their score is not reflective of the application information provided, or
- There was bias or unfairness in the process that warrants the appeal.

All appeals must be based on information submitted by the applicant agency by the application due date. No new or late information will be considered. The omission of information (inadvertently or otherwise) from a project application is not grounds for an appeal.

C. SUBMITTING AN APPEAL

Any and all appeals must be received in writing with supporting documentation by the stated deadline following the notification of ranking to projects.

The notice of appeal must include a written statement specifying in detail the grounds asserted for the appeal. The statement must be signed by an individual authorized to represent the agency (i.e., Executive Director) and submitted to the Collaborative Applicant or the third-party facilitator. The notice of appeal is limited to two single-sided, single-spaced pages in 12-point font. The notice of appeal must include a copy of the project application in question and all accompanying materials submitted to the CoC Review and Rank Panel.

D. THE APPEALS PROCESS

The Appeals Panel will meet virtually with representatives of the appealing agency to discuss the appeal.

All appeals submitted in compliance with Section 9.B will be read, reviewed and evaluated by the Appeals Panel. The role of the Appeals Panel is to read and review only those areas of the application that are being appealed.

The Appeals Panel will then meet to deliberate. Each applicant may make a 10-minute statement regarding the appeal.



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The Appeals Panel will review the rankings made by the CoC Review and Rank Panel only on the basis of the submitted project application, the two-page appeal, any statements made to the Appeals Panel during the appeals process, and the materials used by the CoC Review and Rank Panel. No new information can be submitted by the applicant or reviewed by the Appeals Panel.

The decision of the Appeals Panel must be supported by a simple majority vote of voting members.

The appealing agency will receive, in writing, the decision of the Appeals Panel within two business days of the Appeals Panel Meeting. The decision of the Appeals Panel will be final.

Section 10. FINAL PRIORITIZED LIST OF APPLICATIONS

The Council or the designated Council representative must approve the final ranked list of all Project Applicant proposals. . The Collaborative Applicant will then submit this prioritized list to HUD by the CoC Program Competition deadline as part of the Consolidated Application. Conditional award funding is typically based upon the prioritized list of Project Applicants that are submitted; however, HUD determines actual awards and funding amounts.