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OFFICE OF COMMUNITY PLANNING  
AND DEVELOPMENT

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WASHINGTON, DC 20410-7000

**December 30, 2025**

### **FY24-25 CoC NOFO Implementation Plan**

Pursuant to the Court's order in *State of Washington/NAEH v. HUD*, Nos. 25-cv-626/25-cv-636 (D.R.I.), HUD publishes this report of steps needed to process renewals according to the FY24-25 Notice of Funding Opportunity for the Continuum of Care Competition. HUD will follow all applicable timelines and procedures laid out in the FY24-25 NOFO, including conducting threshold reviews and risk reviews for both renewals and reallocations. Consistent with the FY24-25 timeline, HUD anticipates announcing awards in May 2026.

#### **I. Funding for Reopened FY24-25 CoC NOFO**

- **FY24 Carryover:** The FY25 competition will include FY24 carryover funding of about \$5 million that must be obligated by September 30, 2026. FY24-25 NOFO ("NOFO") Sec. I.A.1 at 3.
- **Fair Market Rent:** The FY24-25 NOFO uses FMR at the time of submission of application. FY26 FMRs are effective as of October 1, 2025, meaning FY26 FMR will be implemented. NOFO Sec. V.D.1 at 111.

#### **II. Application Processing Steps and Timeline**

- **Reopening the FY24-25 CoC NOFO**
  - By January 6, 2026, HUD will reopen and post the FY24-25 CoC NOFO with an extended deadline to allow for all eligible renewals and reallocations. NOFO Sec. I.A.2–3 at 3–4; Sec. I.B.2.b.(24) at 19–20.
  - On January 6, 2026, HUD will concurrently notify the public via listserv and website posting that the FY24-25 NOFO is reopened for renewals and reallocations while this Court's preliminary injunction remains in effect and notify all prospective applicants of the relevant deadlines and anticipated award date, likely in May 2026, and that HUD reserves the right to implement a new NOFO if and when a court order does not preclude it from doing so. HUD will also promptly file a notice with the Court confirming that such communications were made.
- **Application and Submission Information:** HUD will accept eligible renewal project applications, YHDP renewal and replacement applications, and CoC reallocations to create new projects as described in the FY24-25 CoC NOFO.
  - By approximately February 19, 2026, HUD will close the application window.
  - Recipients awarded in FY24 may resubmit their FY24 application for renewal, planning, or Unified Funding Agency costs. NOFO Sec. I.A.3.b at 4–5.

- HUD will require CoCs to submit FY25 Priority Listings as applicable. NOFO Sec. IV.F.3.b at 74.
- HUD will require certification of consistency with consolidated plan for projects that did not submit certification in FY24. NOFO Sec. IV.F.3.e at 74–75.

- **Eligibility and Application Review:**

- HUD anticipates completing its required review by May 1, 2026, after all applications are received. This time frame is consistent with the FY24-25 CoC NOFO's timeline and procedures.
- All application reviews and processes will be governed by the terms of the reopened FY24-25 CoC NOFO, *see* Renewal Project Requirements, Section III.B.4.c at 53–55, and all applicable statutes and regulations under 24 C.F.R. § 578, et seq. and 2 C.F.R. § 200, et seq.
- **Threshold Requirements for Renewals:** HUD will review all submitted renewal applications based on the Project Renewal Threshold criteria described in the NOFO, Section III.C.4.a and Section III.C.4.c at 59–60, 64–65. The NOFO provides explicitly on page 65 that “[r]enewal projects must meet the minimum project, eligibility, capacity, timeliness, and performance standards identified in this NOFO or they will be rejected from consideration for funding.”
- **Threshold Requirements for Reallocations:** HUD will review all submitted reallocations based on Project Eligibility Threshold and Project Quality Threshold criteria described in the NOFO, Section III.C.4.a–b at 59–64.
- **Risk Review:** HUD will review all submitted renewal and reallocation applications on the basis of the risk review set forth in the NOFO, Section III.C.1–3 at 57–58, including assessing applicant risk, past performance, and meeting statutory and regulatory requirements.
- **Cost Adjustments:** HUD will adjust awards according to prescribed processes and legal requirements for fair market rent and cost of living, consistent with procedures set forth in the FY24-25 CoC NOFO. NOFO Sec. V.D.1–2 at 111.

### III. Award Notices

- After reviewing eligibility and applications, HUD will announce awards. HUD will announce awards publicly via a press release, web posting, or award letters and will notify unsuccessful applicants consistent with the procedures set forth in the FY24-25 CoC NOFO in Section VI.A at 113–120. HUD anticipates announcing awards in May 2026, provided that there are no government shutdowns, other significant disruptions to the NOFO process, or other factors beyond HUD's control.