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U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-7000

OFFICE OF COMMUNITY PLANNING
AND DEVELOPMENT

January 12, 2026

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 revised and amended report of steps needed to process renewals according to the FY24-25 Notice of Funding Opportunity for the Continuum of Care Competition, which will culminate in the selection of awards, but excluding any actions that may initiate the obligation of funds. HUD will follow all applicable procedures laid out in the FY24-25 NOFO, including conducting threshold reviews and risk reviews for both renewals and reallocations. HUD anticipates selecting awards by March 31, 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.
- Pursuant to the Court’s order and the FY24-25 CoC NOFO, HUD is including up to \$294,000,000 in funding under Section 231(a)(1) and 213(a)(3) of the 2020 Consolidated Appropriations Act. HUD is also utilizing authority under the Full-Year Continuing Appropriations and Extensions Act, 2025 (Public Law 119-4, approved March 15, 2025) to enable HUD to repurpose \$100 million made available for Permanent Supportive Housing to fund CoC Projects under this NOFO.

II. Application Processing Steps and Timeline

• Reopening the FY24-25 CoC NOFO

- On January 8, 2026, HUD notified the public via listserv (see ECF No. 78-1) and website posting that the FY24-25 NOFO will be reopened for processing renewals and reallocations while this Court’s preliminary injunction remains in effect and notified all prospective applicants of the relevant deadlines and anticipated selection no later than March 31, 2026. HUD further notified the public that it reserves the right to implement a new NOFO if and when a court order does not preclude it from doing so.
- On January 9, 2026, HUD reopened and posted 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.



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- HUD will make application forms and material available on e-snaps no later than January 16, 2026.
- **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.
 - On February 9, 2026, HUD will close the application window.
 - Projects that were awarded FY 2024 funds that are not being reallocated or replaced by the CoC may be eligible for selection for FY 2025 funds using their FY 2024 application submission and are not required to apply for renewal for FY 2025 funds. NOFO Sec. I.B.2.c. at 23.
 - If applicants with awards from FY 2024 indicate in writing, in a manner that HUD may further direct, that the applicant will not reallocate or replace any of their awards, HUD will consider, if feasible, beginning the review and processing of these renewals before the February 9, 2026, submission deadline.
 - For all other projects, in accordance with the FY24-25 CoC NOFO, HUD will make e-snaps available to receive:
 - Applications for renewal projects with an expiration date in CY 2026 that were not awarded in FY24;
 - Applications for new projects created through CoC and/or DV reallocation or YHDP replacement (see NOFO Sec. I.A.3.d(2) at 5; Sec. I.B.2.b(24) at 19–20; Sec. III.B.4.a(3) at 39–40; Sec. III.B.4.a(5) at 41–43);
 - Applications for YHDP projects that expire in CY 2026 to renew, if not awarded in FY 2024, or replace those projects, as provided under NOFO Section I.A.3.d at 5
 - FY 2025 Project Listing that includes all projects approved by the CoC to apply for FY 2025 funding (see NOFO Sec. I.B.2.c at 22–24). CoCs are required to submit a FY 2025 CoC Priority Listing if they are submitting applications for eligible CoC or YHDP renewal projects that were not awarded FY 2024 funding or new projects created through CoC, DV Reallocation, or YHDP Reallocation under YHDP Replacement (see NOFO Sec. IV.E.3.c at 70–71). If a CoC is not submitting applications described in the bullets above for FY 2025 CoC and YHDP funding, the CoC is not required to submit a FY 2025 CoC Priority Listing (see NOFO Sec. IV.G.3 at 76).
- **Eligibility and Application Review:**
 - HUD anticipates completing its required review and making selections no later than March 31, 2026. This timeframe is significantly accelerated, at the request of



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the plaintiffs in *State of Washington/NAEH v. HUD*, Nos. 25-cv-626/25-cv-636 (D.R.I.), compared to the timeline and procedures of the FY24-25 CoC NOFO and even the NOFO HUD released on December 19, 2025..

- 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, III.C at 57-67, and all applicable statutes and regulations under 24 C.F.R. § 578, et seq. and 2 C.F.R. § 200, et seq.
- All renewals are subject to the reviews and processes under the original terms of the reopened FY24-25 CoC NOFO, *see* Renewal Project Requirements, Section III.B.4.c at 53–55; Project Renewal Threshold, Section III.C.4.c at 64–65, and all applicable statutes and regulations under 24 C.F.R. § 578, et seq. and 2 C.F.R. § 200, et seq.
- New projects created through reallocation (see I.B.2.b.(24)) must meet the requirements in sections I.B.3.a, III.B.4.a.(3), (4) and (5) and the project eligibility and project quality thresholds established in sections III.C.4.a. and b of the FY 24-25 NOFO.
- All recipients must also satisfy their ongoing obligations to submit Annual Performance Reviews, audit reports, and other materials as required under their grant agreements and Section III.C of the FY 24-25 CoC NOFO. *See* Rules that Affect How HUD Evaluates Applications, Section III.C at 57–67.
- **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.