



REQUEST FOR PROPOSALS (RFP) FOR

FY2025 Texas Balance of State Continuum of Care (CoC) Program Funding Local Application Process

Funding Opportunity Number: FR-6900-N-25

Assistance Listing Number: 14.267 -- Continuum of Care Program

ISSUE DATE:

December 1, 2025

9:00:00 AM CST

PROPOSAL APPLICATIONS DUE:

December 10, 2025

4:59:59 PM CST

SUBMIT VIA "SurveyMonkey Apply" Application Software

QUESTIONS:

Email txboscoc@thn.org

2025 Texas Balance of State CoC Program Local Application Process: New Project RFP

Last Updated: 11/25/25

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TX BoS CoC FY25 New Project Request for Proposals (RFP)

Full Applications due by

December 10, 2025 @ 4:59:59 PM CST

Introduction

The Texas Balance of State Continuum of Care (TX BoS CoC) submits an annual application to HUD in order to secure federal funding for new and existing projects that work to reduce and end homelessness throughout the CoC's 214-county geography. Texas Homeless Network (THN), as the Collaborative Applicant (CA) for TX BoS CoC, is soliciting Preliminary Applications from agencies interested in applying for new projects to be submitted as part of the FY2025 Continuum of Care (CoC) Program.

This RFP is for New Projects and Transition Projects.

CoC renewal grantees who are interested in applying for a transition grant to transition from one project type to another (e.g., RRH to TH) can apply through this RFP. Otherwise, CoC renewal grantees will receive instructions through other guidance outside of this RFP.

This RFP outlines the process, eligibility, and requirements for New Projects only. Agencies are strongly encouraged to review the FY2025 HUD CoC Program Notice of Funding Opportunity (NOFO), which can be found by [clicking here](#). In case of conflict between this RFP and HUD regulations, HUD guidance takes precedence.

Questions about the RFP content or process should be directed to txboscoc@thn.org. Written inquiries are preferred. While CA staff may provide clarification, no staff member can guarantee funding or interpret HUD policy beyond published guidance.

Eligible new project types/program components that can be funded under this RFP are limited to:

- CoC Bonus
 - New Transitional Housing (TH)
 - New Supportive Services Only for Street Outreach (SSO-SO)
 - New Supportive Service Only – Standalone (SSO)
- **Domestic Violence Bonus:** TH exclusively serving survivors of domestic violence

CoC-funded Renewal applicants may be required to apply for new funds to implement the following types of grants:

- Transition Grants: This allows for a CoC-funded renewal project to transition an existing project from one project type to another.

Agencies applying for new project funds are encouraged to review the FY2025 HUD CoC Program NOFO, which can be found here: <https://www.grants.gov/search-results-detail/360861>.

Agencies interested in applying for CoC Program funds are encouraged to carefully review the information provided in this RFP regarding project type, eligible participants, eligible activities, expectations and requirements of the project recipient, and the selection and scoring criteria to be used in the CoC's selection of new project applicants.

This RFP is for new projects that will provide services in the TX BoS CoC 's [geographic area](#).

I. Available Funding

TX BoS CoC anticipates the following funding amounts available for new projects:

- CoC Regular Bonus: \$13,334,946
- CoC DV Bonus: \$5,000,000

The CoC will review proposals for new projects and select the projects that will be submitted to HUD for funding consideration. As part of the review and selection process, the Non-Conflicted Members of the CoC Board reserve the right to approve an amount of funding other than the amount requested.

CoC Program funding is not guaranteed to the organization(s) selected for funding consideration through this RFP. The final determination of which new projects will be funded will be made by HUD as part of the CoC NOFO Competitive process. Multiple factors influence an application's overall score and chances of funding, including, but not limited to, the applicant's administrative and financial capacity, alignment with CoC Priorities, HMIS data quality, the CoC's Collaborative Application, and leveraging of additional housing and healthcare resources, and other specific conditions of the NOFO.

Projects selected by HUD to receive CoC Program funds will initially be 1-year grants and will be eligible for annual renewal, dependent on the availability of funding from HUD and program performance.

Per the NOFO, HUD is likely to announce FY25 funding awards May 1, 2026.

II. Application Eligibility

The CoC accepts proposals from any eligible applicant, regardless of whether or not the applicant has received CoC Program funding in the past. All Applications will be reviewed based on the following criteria.

A. Eligible Applicants

Eligible project applicants for the CoC Program Local Application Process are found at 24 CFR 578.15 and in the Act and include nonprofit organizations, states, local governments, instrumentalities of state and local governments, Indian Tribes and Tribally Designated Housing Entities (TDHE) [as defined in section 4 of the Native American Housing Assistance and Self-Determination Act of 1996 (25 U.S.C. 4103) (TDHEs)]. Public housing agencies, as such term is defined in 24 CFR 5.100, are eligible without limitation or exclusion.

Faith-based organizations may apply on the same basis as any other organization.

More detailed threshold eligibility requirement listed in Application Selection Process section of this RFP.

B. Ineligible Applicants

Please note the following:

- HUD does not award grants to individuals.
- For-profit entities are ineligible to apply for grants and are prohibited from being subrecipients of CoC Program grant funds.

HUD will not evaluate applications from ineligible applicants. As such, the CoC will not accept proposals from individuals or for-profit entities given that a project application to HUD from an individual or a for-profit entity would be deemed ineligible

III. Application Process & Timeline

The TX BoS CoC Local Application process is structured around a detailed timeline that incorporates both HUD-imposed deadlines and locally defined stages. To support Applicants in navigating this process successfully, this section outlines the full scope of the Local Application – including key dates, required stages, submission milestones, and application platform guidance.

Applicants should be prepared to manage multiple deadlines across different stages of the application. While delays in one stage may not always impact subsequent steps, staying on schedule is essential to avoid missing critical updates or submission windows.

Bolded items highlight key dates and deadlines.

All times are listed in **Central Standard Time (CST)** unless otherwise noted

To avoid missing important updates, add noreply@mail.smapply.net and txboscoc@thn.org to your list of safe senders.

A. Apply Application Software

The TX BoS CoC uses **SurveyMonkey Apply (SMA)**, THN's grant management platform, for all local application submissions. **All application materials** must be submitted or uploaded through SMA.

To access THN's SMA page, please go to thncompetition.smapply.io.

Organization Profiles Required:

- Applicants must apply as **Organizations**, not Individuals
- Each Organization must designate a **primary and secondary contact** to manage to profile
- These contacts should match those listed in the e-snaps Applicant Profile

Helpful links:

- [SMA FAQ](#)
- [How to register as an Organization if you already have an Individual Account](#)
- [Introduction to Organization Profiles](#)
- [Managing your Organization FAQ](#)

Important: Add noreply@mail.smapply.net to list of approved emails to avoid missing critical communications. The CA is not responsible for missed communication.

Technical Support:

- For SMA account issues (e.g., password reset), contact SMA directly.
- For application content questions, contact txboscoc@thn.org.

While the CA may offer limited technical support for navigating SMA, Applicants are responsible for successfully using the platform due to anticipated high volume of applications.

B. Application Stages

The TX BoS CoC Local Application **opens Monday, December 1, 2025 at 9:00 AM CST**. Applicants may choose from the following application types:

- CoC Bonus Project Application
- DV Bonus Project Application
- Transition Project Application
 - Limited to Applicants with current CoC Program funding by explicit instruction from Texas Homeless Network

Each application includes two required stages:

1. Threshold Verification Review

- a. Opens December 1, 2025 @ 9:00 AM and closes December 3 @ 8:59 PM
- b. Submit early to allow time for manual **Threshold Review** (24-48) hours from submission).
- c. Confirms basic eligibility of the Applicant and project.
- d. Applicants will be notified via system message from SMA once submitted.
- e. Applicants must be approved at this stage in order to proceed to the full application.

2. Full Application

- a. Opens December 1, 2025 @ 9:00 AM and closes December 10 @ 4:59 PM
- b. Includes tasks in **SMA** and **e-snaps** (HUD's grant management system).
- c. Applicants must upload a PDF export of their completed e-snaps application and Applicant Profile to SMA.

Important Note on e-snaps Application Submission

A. Requirement:

- As part of the **Full Application** stage, Applicants must complete their **e-snaps project application** and upload a PDF export of this item to **SMA**. This step is essential - HUD evaluates projects based on the e-snaps submission and its ranking in the CoC Priority Listing. Applicants should refer to HUD's Detailed Instructions when completing their e-snaps application. The importance of close attention to following these instructions cannot be overstated.
- **Note:** No extensions will be granted for uploading the **e-snaps Applicant Profile**. Start early to avoid delays.

B. Contingency for HUD Delays:

- HUD has not yet released the FY2025 e-snaps Detailed Instructions or opened access to project applications in e-snaps. If HUD delays the release of these materials, the TX BoS CoC may extend the deadline for uploading the e-snaps application.
 - Applicants should **complete all other Full Application tasks in SMA by the published deadline.**

- If an extension is granted for e-snaps submission, applicants will be notified via txboscoc@thn.org.
- Extensions will apply **only to the e-snaps application upload**, not to other required SMA components.
- Applicants are strongly encouraged to **begin preparing narrative responses and budget details in advance** using the most recent HUD templates and guidance available.

C. Timeline

NOTE: All times listed are Central Standard Time unless otherwise noted. **Dates are subject to change based on HUD's release of required information and volume of applications.**

1	Issuance of RFP	12/1/2025 9:00:00 AM
2	Threshold Verification Review and Full Application Stages Open in SMA	12/1/2025 9:00:00 AM
3	Threshold Verification Review Stage Closes in SMA. Threshold Verification Submissions Due.	12/3/2025 7:59:59 PM
4	Threshold Verification Review Complete	12/4/2025 4:59:59 PM
5	Full Application Stage Closes in SMA. Full Applications Due.	12/10/2025 4:59:59 PM
6	Independent Review Team (IRT) Begins New Project Reviews	12/10/2025 5:00:00 PM
7	Collaborative Applicant (CA) Begins Quality and Completeness Review: First Round	12/10/2025 5:00:00 PM
8	CA Completes Quality and Completeness Review: First Round	12/15/2025 4:59:59 PM
9	CA Informs Applicants of Quality Review Corrections Needed: First Round	12/16/2025 5:00:00 PM
10	IRT Returns Reviewed Applications to CA	12/16/2025 4:59:59 PM
11	CA Reconciles Application Scoring	12/17/2025 4:59:59 PM
12	Project Application Scores Are Available	12/18/2025 11:59:59 PM
13	Application Quality Review Corrections Due: First Round	12/18/2025 4:59:59 PM
14	CA Begins Review of Quality Review Corrections: Second Round	12/19/2025 4:59:59 PM
15	Deadline for Applicants to Challenge Score	12/19/2025

		4:59:59 PM
16	Deadline for CA to Reconcile Challenged Scores	12/20/2025 4:59:59 PM
17	CA Completes Ranking Scenarios (Priority Listing) for Board Review and Approval	12/20/2025 4:59:59 PM
18	CA Informs Applicants of Quality Review Corrections Needed: Second Round	12/21/2025 4:59:59 PM
19	Application Quality Review Corrections Due: Second Round	12/22/2025 4:59:59 PM
20	TX BoS CoC Board Selects a Ranking Scenario to Become the Priority Listing	12/26/2025 2:00:00 PM
21	Applicants Notified Whether an Application Will Be Submitted with the 2024 Collaborative Application	12/29/2025 12:00:00 PM
22	Applicant Deadline for Grievances	12/30/2025 12:00:00 PM
23	Board Makes Written Response to Grievances	1/2/2026 4:59:59 PM
24	TX BoS CoC Board Approves the FY2025 Consolidated Application	1/7/2026 2:00:00 PM
25	FY2025 Collaborative Application Posted on THN's Website & Notice Sent Via the BoS News Listserv	1/8/2026 4:59:59 PM
26	CA Submits Collaborative Application	1/12/2026 1:00:00 PM
27	Collaborative Applications Due to HUD (National Deadline)	1/14/2026 8:00:00 PM EDT

D. Submission of Project Applications

All applicants must submit their Full Application materials in SMA (including PDF export of completed e-snaps Project Application and Applicant Profile, HUD Form 2991, and Preliminary Leverage Commitments) by **Wednesday, December 10, 2025 at 4:59:59 PM. Late or incomplete submissions will not be accepted.**

Upon submission, applicants will receive an automated message from SMA. It is recommended to **screenshot or print** this message for agency records.

Additional Notes:

- While Applicants are responsible for understanding and navigating software-based processes – including SMA and e-snaps – support is available through SMA, HUD, and the CA.
- Failure to submit all required documentation – including e-snaps attachments and certifications – may result in disqualification.

E. Required Documentation Checklist

All applicants must submit the following **required documentation** for their application to be considered complete:

- **Threshold Review Approval** (must be completed before Full Application submission; requires manual review and approval process)
- **e-snaps Project Application** (exported and uploaded to SMA)
 - Match Documentation: If utilizing an **In-Kind Match Commitment**, an executed MOU documenting this commitment must be attached to the Application
- **e-snaps Applicant Profile**
 - Must attach a valid **Organization Code of Conduct** that meets all HUD requirements, unless already on file with HUD
 - If utilizing Subrecipients, must attach the **Subrecipient's Organization Code of Conduct**
- **Certification of Consistency with the Consolidated Plan (HUD-2991)**
 - Must be signed by a Participating Jurisdiction (PJ) within the project's service area
 - Valid signature dates: November 1, 2025-January 14, 2026
- **Leverage Documentation** (if leveraging housing or healthcare resources in the proposed project)

Certification of Consistency with the Consolidated Plan (HUD-2991)

All applications must include a **Certification of Consistency with the Consolidated Plan (HUD-2991)** ([blank form available here](#)), a HUD-required form signed by a **Consolidated Planning Jurisdiction (CPJ)** where the proposed project will operate. If a project spans multiple jurisdictions, only **one certification** from a CPJ within the coverage area is required.

- Certifications must be **completed, signed, and uploaded in SMA** for each proposed project
- Valid certification dates are **between November 1, 2025 and January 14, 2026**

Because CPJ procedures vary across the state, Applicants are strongly encouraged to begin this request **early**. HUD does **not** allow submission extensions unless a Federal Natural Disaster Declaration occurs within three months of the application period.

To determine if your proposed project is in a local CPJ, [please see this link](#). If no part of your proposed project will be carried out within a local CPJ, please see [TDHCA's Exhibit 5B form here](#) and email form to Jeremy Stremmer at Texas Department of Housing and Community Affairs (TDHCA) to be completed: Jeremy.Stremmer@tdhca.texas.gov.

Applicants must give CPJs enough time to review and sign the certification. If the initial request is made **after December 8, 2025**, Applicants **cannot appeal** a CPJ's refusal or lack of response. If a certification is not secured by the deadline, HUD may disqualify the application. Instructions for appealing a disqualification are provided in HUD's NOFO. See section below for conditional extension requests for HUD-2991 due to CPJ delays.

Guidance for Completing HUD-2991

- **Applicant Name:** Use the legal name of the organization as listed in e-snaps Applicant Profile.
- **Project Name:** Must match the project name in e-snaps project application exactly.
- **Location of the Project:** The address of the organization (Applicant) seeking CoC Program funding.
- **Name of Federal Program:** Enter "HUD Continuum of Care Program."
- **Name of Certifying Jurisdiction:** Enter CPJ from [this list](#) that oversees the locality in which Applicant is seeking certification.
- **Certifying Official of the Jurisdiction Name:** Name of authorized CPJ official
- **Title:** Title of authorized CPJ official
- **Signature and Date:** Must be signed by an authorized CPJ official and dated within the valid certification period (November 1, 2025 – January 14, 2026).

F. Requesting an Extension for Non-Scored Uploads

The TX BoS CoC strives to maintain a fair and efficient process during the FY2025 CoC Program Competition. While all applicants are expected to meet published deadlines, the CoC recognizes that delays may occur due to factors outside an applicant's control—specifically HUD delays of required documentation related to the **e-snaps Project Application** or Consolidated Planning Jurisdiction (CPJ) processing timelines for the **Certification of Consistency with the Consolidated Plan (HUD-2991)**.

General Rules:

- Extensions are **only permitted** for:
 - **e-snaps Project Application**
 - **HUD-2991 Certification**
- **No extensions will be granted for the e-snaps Applicant Profile.**
- Applicants should begin these tasks immediately to avoid disqualification.
- HUD guidance always takes precedence over these instructions.

Automatic Extensions for HUD Delays:

If HUD delays impact completion of the e-snaps Project Application, the CoC will:

- Communicate adjusted deadlines (e.g., 3 business days) to all applicants via official channels.
- Applicants **should not submit extension requests** for HUD-related delays.

Conditional Extensions for Consolidated Planning Jurisdictions (CPJ) Delays:

If an applicant does **not have the HUD-2991 Certification at the time of Full Application submission**, they must upload the following in Apply **by the application deadline of December 10, 2025 @ 4:59 PM CST**:

1. **Extension Request Document** (on agency letterhead) including:
 - a. Project Application name in e-snaps.
 - b. Reason for delay (must be PJ-related, not applicant inaction).
 - c. Anticipated submission date (must be before December 23, 2025).
 - d. Acknowledgment that the application will not be included in the CoC Consolidated Application without the HUD-2991.
2. **Proof of Timely Request to CPJ**, such as:
 - a. Original email or letter requesting HUD-2991 (with date).
 - b. Any follow-up communication showing PJ delay.

Important Notes:

- Extension requests must be uploaded in Apply; **do not email requests to the CoC Lead Agency**.
- Applications that fail to meet the extension request criteria will be removed from consideration.
- Questions about the extension process may be emailed to txboscoc@thn.org.

F. Minor Corrections or Additional Information

If a project is selected for inclusion in the TX BoS CoC's Priority Listing, the applicant may be asked to submit minor corrections or additional details after being notified of the application status in the 2025 Consolidated Application. Examples include:

- Fixing typos in the Certification of Consistency with the Consolidated Plan

- Correcting errors in the e-snaps project application
- Providing additional information necessary for the CoC Application

All requested updates - regardless of type or number requested - must be submitted to the CA by **Monday December 22, 2025 @ 4:59:59 PM** for inclusion in the Priority Listing.

IV. Eligible Project Types

Eligible Applicants may apply for new funds to implement the following project types:

A. *Transitional Housing (TH)*

- **General Description:** Transitional Housing (TH) provides temporary housing with supportive services to individuals and families experiencing homelessness with the goal of interim stability and support to successfully move to and maintain permanent housing.
- **Participant Eligibility:**
 - Program participants must meet the eligibility requirements set forth in the NOFO under which the project was funded.
 - FY2025 CoC NOFO: “must serve persons who qualify as homeless under paragraphs (1), (2), or (4) of 24 CFR 578.3, Section 103(b) of the McKinney-Vento Homeless Assistance Act.
 - Recipients/subrecipients must follow the [CoC’s written policies and procedures](#), including standards to prioritize referrals for TH.
- **Housing/Length of Stay¹:** TH projects can cover housing costs and accompanying supportive services for program participants for up to 24 months.
 - Participants in a TH project must have a signed lease, sublease, or occupancy agreement with the following requirements:
 - An initial term of at least one month
 - Automatically renewable upon expiration, except by prior notice by either party
 - A maximum term of 24 months
 - TH participants may remain in the project past 24 months if appropriate permanent housing has not been identified or if more time is needed for the household to achieve independence. However, HUD may discontinue TH funding if more than half of the households have exceeded 24 months.

¹ <https://files.hudexchange.info/resources/documents/Virtual-Binders-At-A-Glance-Program-Components.pdf>

- Recipients/subrecipients must follow the [CoC's written policies and procedures](#) which may limit the length of stay.
- **Case Management/Supportive Services²:** TH projects can cover supportive services for program participants for up to 24 months.
 - To facilitate the movement of program participants into permanent housing, transitional housing projects should provide a wide range of supportive services to participants while they reside in the program that meets the needs of their program participants.
 - Recipients and subrecipients may require the program participants to take part in supportive services that are not disability-related services provided through the project as a condition of continued participation in the program. Examples of disability-related services include, but are not limited to, mental health services, outpatient health services, and provision of medication, which are provided to a person with a disability to address a condition caused by the disability. Notwithstanding this provision, if the purpose of the project is to provide substance abuse treatment services, recipients and subrecipients may require program participants to take part in such services as a condition of continued participation in the program³.
 - Projects can provide services to former residents of TH projects for up to six months after exiting TH to assist in the household's transition to independent living⁴.
 - Per the FY25 CoC NOFO, HUD is prioritizing transitional housing programs that commit to the following related to supportive services:
 - The project will be supplemented with resources from other public or private sources, that may include mainstream health, social, and employment programs such as Medicare, Medicaid, SSI, and SNAP.
 - Demonstrate that the proposed project will require program participants to take part in supportive services (e.g. case management, employment training, substance use treatment, etc) in line with 24 CFR 578.75(h) by attaching a supportive service agreement (contract, occupancy agreement, lease, or equivalent).

² <https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-program-components/transitional-housing/supportive-services/>

³ [https://www.ecfr.gov/current/title-24/subtitle-B/chapter-V/subchapter-C/part-578/subpart-F#p-578.75\(h\)](https://www.ecfr.gov/current/title-24/subtitle-B/chapter-V/subchapter-C/part-578/subpart-F#p-578.75(h))

⁴ <https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-program-components/transitional-housing/supportive-services/>

- Demonstrate that the proposed project will provide 40 hours per week of customized services for each participant (e.g. case management, employment training, substance use treatment, etc.).
 - The 40 hours per week may be reduced proportionately for participants who are employed.
 - The 40 hours per week does not apply to participants over age 62 or who have a physical disability/impairment or a developmental disability (24 CFR 582.5) not including substance use disorder.

B. Supportive Services Only for Street Outreach (SSO-SO)

- **General Description:** Supportive Services Only (SSO) projects allow recipients to provide supportive services—such as conducting outreach to sheltered and unsheltered homeless persons and families and providing referrals to other housing or other necessary services—to families and individuals experiencing homelessness.
- **Participant Eligibility:**
 - In SSO Street Outreach projects, the recipient may only assist program participants for whom the recipient or subrecipient of the funds is not providing housing or housing assistance.
 - Program participants must meet the eligibility requirements set forth in the NOFO under which the project was funded.
 - FY2025 CoC NOFO: “must serve persons who qualify as homeless under paragraphs (1), (2), or (4) of 24 CFR 578.3, Section 103(b) of the McKinney-Vento Homeless Assistance Act.
 - Recipients/subrecipients must follow the [CoC’s written policies and procedures](#), including standards to prioritize referrals for SSO – Street Outreach.
- **Length of Stay/Housing:**
 - There is no maximum length of stay in SSO- Street Outreach Projects – participants may remain in the project until they achieve stable housing.
- **Case Management/Supportive Services:**
 - The CoC Program Interim Rule states that eligible activities for Outreach services are defined as:
 - Activities to engage persons for the purpose of providing immediate support and intervention, as well as identifying potential program participants
 - Specific eligible activities and services consist of:
 - 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; and
 - publicizing the availability of the housing and/or services provided within the geographic area covered by the Continuum of Care.
- The proposed project should have a strategy for providing supportive services to those with the highest service needs, including those with histories of unsheltered homelessness and those who do not traditionally engage with supportive services.
- Eligible costs under street outreach “include the outreach worker's transportation costs and a cell phone to be used by the individual performing the outreach.”⁵
- Per the FY25 CoC NOFO, HUD is prioritizing street outreach programs that commit to the following related to supportive services:
 - The project will be supplemented with resources from other public or private sources, that may include mainstream health, social, and employment programs such as Medicare, Medicaid, SSI, and SNAP.

More detail regarding project types can be found in the HUD CoC Virtual Binders:

<https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-program-components/coc-program-components-overview/>

C. Supportive Services Only - Standalone (SSO)

- **General Description:**

- SSO projects are designed to provide supportive services to sheltered and unsheltered homeless persons and families. In general, recipients of a SSO project may not also provide housing or housing assistance to program participants in their SSO project.
- **All supportive services provided must help program participants obtain and maintain housing.**
- Services not specified in the CoC Interim Rule are not eligible (§ 578.53(d)). Eligible supportive services⁶ are:
 - Annual Assessment of Services (§ 578.53(e)(1))
 - Moving costs (§ 578.53(e)(2))

⁵ <https://www.ecfr.gov/current/title-24/subtitle-B/chapter-V/subchapter-C/part-578>

⁶ <https://www.ecfr.gov/current/title-24/subtitle-B/chapter-V/subchapter-C/part-578>

- Case management (§ 578.53(e)(3))
- Childcare (§ 578.53(e)(4))
- Education services (§ 578.53(e)(5))
- Employment assistance and job training (§ 578.53(e)(6))
- Food (§ 578.53(e)(7))
- Housing search and counseling services (§ 578.53(e)(8))
- Legal services (§ 578.53(e)(9))
- Life skills training (§ 578.53(e)(10))
- Mental health services (§ 578.53(e)(11))
- Outpatient health services (§ 578.53(e)(12))
- Outreach services (§ 578.53(e)(13))
- Substance abuse treatment services (§ 578.53(e)(14))
- Transportation (§ 578.53(e)(15))
- Utility deposits (§ 578.53(e)(16))
- Services provided through a SSO project CANNOT be limited to providing services from one or more housing-related projects. Services must be made available to any eligible household within the CoC.
- Other provisions related to SSO can be found in this HUD resource linked below⁷.
- **Participant Eligibility:**
 - In SSO projects, the recipient may only assist program participants for whom the recipient or subrecipient of the funds is not providing housing or housing assistance.
 - Program participants must meet the eligibility requirements set forth in the NOFO under which the project was funded.
 - FY2025 CoC NOFO: “must serve persons who qualify as homeless under paragraphs (1), (2), or (4) of 24 CFR 578.3, Section 103(b) of the McKinney-Vento Homeless Assistance Act.
 - Recipients/subrecipients must follow the CoC’s written policies and procedures, including standards to prioritize referrals for SO projects. In general, projects must prioritize unsheltered households.
- **Length of Stay:**
 - There is no maximum length of stay in SSO projects.
- **Case Management/Supportive Services:**
 - Interested applicants should carefully review the CoC Interim Rule related to eligible supportive services and ensure they submit an application that falls

⁷ <https://files.hudexchange.info/resources/documents/coc-program-ss0-housing-component-decision-tool.pdf>

under one of the eligible activities. <https://www.ecfr.gov/current/title-24/subtitle-B/chapter-V/subchapter-C/part-578>

- The proposed project should have a strategy for providing supportive services to those with the highest service needs, including those with histories of unsheltered homelessness and those who do not traditionally engage with supportive services.
- Eligible costs under street outreach “include the outreach worker's transportation costs and a cell phone to be used by the individual performing the outreach.”⁸
- Per the FY25 CoC NOFO, HUD is prioritizing SSO projects that commit to the following related to supportive services:
 - The project will be supplemented with resources from other public or private sources, that may include mainstream health, social, and employment programs such as Medicare, Medicaid, SSI, and SNAP.

D. DV Bonus Projects

CoC funds can be used to specifically serve survivors of domestic violence. Project participants are limited to individuals, families and youth who meet category 4 of the HUD Homeless Definition. Category 4 includes persons fleeing domestic violence, dating violence, sexual assault, and stalking. This also includes persons who are fleeing or attempting to flee human trafficking, including sex trafficking.

Applicants applying for DV Bonus funds may only apply for the following project types:

- Transitional Housing (see details in subsections above)

E. Transition Grant (for Renewal Project Recipients Only)

Eligible renewal project applicants may apply for a transition grant to change from its current component type to a different eligible component (e.g., from RRH to TH) if given explicit instruction by the Collaborative Applicant (Texas Homeless Network) to do so.

Applicant-Level Requirements:

The organization applying for a transition grant must:

- Be the recipient listed on the current grant agreement for the eligible renewal grant(s) being eliminated.
- Have CoC consent, documented by inclusion of the project on the CoC’s Priority Listing.

⁸ <https://www.ecfr.gov/current/title-24/subtitle-B/chapter-V/subchapter-C/part-578>

Project-Level Requirements:

The application for the proposed transition project must:

- Be created through reallocation of the existing renewal project(s); the original component must be fully eliminated.
- Include the grant number(s) of the project(s) being eliminated.
- Attach a copy of the most recently awarded project application for each eliminated project.
 - *Example:* Expiring FY2024 grants applying to transition to a new component during the FY2025 funding process must attach a copy of the FY2024 CoC Program Competition project application from esnaps.
- Meet HUD's project eligibility and quality thresholds as outlined in the FY2025 NOFO (Sections V.A.4.a and V.A.4.b).
- Requested budget cannot exceed the budget of the existing renewal project to be fully eliminated (i.e., cannot exceed total Annual Renewal Amount on FY25 Grant Inventory Worksheet).
- Submit an operating start date the day after the end of the previous grant term for the expiring component (i.e., the transition grant will have the same operating year as the project(s) being eliminated).
- Complete the transition fully within a one-year term from the original component to the new component during the transition grant's normal operating year.

Application Process:

- Applicants should select **"TRANSITION PROJECT ONLY"** application in SurveyMonkey Apply (SMA).
- Submit a Preliminary Application in SMA by the published deadline to initiate the process.
- Complete the e-snaps Project Application for the new component type and upload it to SMA as part of the Full Application stage, in addition to the HUD Form 2991, documentation of any leveraged commitments, and the esnaps Applicant Profile.

Additional Notes:

- Transition Grants are eligible for renewal in subsequent fiscal years for eligible activities of the new program component.
- Transition Grants cannot also be an Expansion or a Consolidation grant.
- HUD may reclassify a project if it does not meet transition grant requirements but otherwise qualifies as a new project.

- Grants with DV Renewal funding are not eligible to use the transition grant process.

V. Eligible Project Costs

CoC Program funding can be used towards:

A. *Housing Costs Budget Line Items*

Applicants should be aware that available Housing Costs Budget Line Items are contingent on the project type applied for. Not all housing cost categories (e.g., Leasing, Rental Assistance, Operating) are eligible under every component type.

- Supportive Services Only (SSO) projects cannot include any housing cost line items.

Applicants must review HUD's CoC Program Interim Rule and the FY2025 NOFO to ensure that requested housing costs align with their project design and allowable costs. Submissions that include ineligible housing cost items will be flagged during Quality Review and may result in disqualification.

- **Operating:** funds used to operate a site owned or leased by the Applicant's agency
 - Funds may be used to pay the day-to-day operating costs in a single structure or individual housing units, including maintenance (such as scheduled replacement of major systems), repair, building security (when CoC Program funds pay for more than 50 percent of the facility by unit or area), electricity, gas, water, furniture, equipment, property insurance, and taxes.
 - **These costs may not be combined with rental assistance costs** within the same unit or structure.
 - Operating costs are not eligible under the SSO program component.
- **Rental Assistance:** funds used to assist a household pay their rent;
 - Under a Rental Assistance model, the program participant enters into the lease with the landlord and pays a progressive percentage of their income to the landlord with the provider paying the balance of rent owed.
 - CoC program funds used for rental assistance may not be combined in a single structure or housing unit with CoC program funds used for: leasing; operating; or acquisition, rehabilitation, or new construction if TBRA (including short- or medium-term rental assistance).
- **Leasing:** funds used to lease a single site or scattered site housing units;
 - Under a Leasing model, the provider enters into the lease with the landlord and has a sublease or rental agreement with the program participant. The provider

pays 100% of the rent (up to Fair Market Rent) and the program participant pays 30% of household income to the provider.

- Funds may be used to lease individual units or all or part of structures. Rents must be reasonable and, in the case of individual units, the rent paid cannot exceed HUD-determined Fair Market Rents (FMRs).
- Leasing funds may not be used for units or structures owned by the recipient, subrecipient, their parent organization(s), any other related organization(s), or organizations that are members of a partnership where the partnership owns the structure, without a HUD-authorized exception.

B. Supportive Services Costs

- Case management to assist households in obtaining and maintaining their housing. Where possible, applicants are encouraged to leverage existing services provided through your own organization and/or community partners to provide supportive services. In addition, connecting program participants to mainstream benefits is expected. Per 24 CFR § 578.53 Supportive services, eligible supportive service costs may include:
 - Annual assessment of service needs
 - Assistance with moving costs
 - Case management
 - Child care
 - Education services
 - Employment assistance and job training
 - Food
 - Housing search and counseling services
 - Legal services
 - Life skills training
 - Mental health services
 - Outpatient health services
 - Outreach services
 - Substance abuse treatment services
 - Transportation
 - Utility deposits
- CoC grantees should only request supportive services funds for services that cannot be leveraged through other community partnerships.
- More details can be found in the HUD CoC Virtual Binders:
<https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-eligible-activities/supportive-services/>

C. HMIS Costs

- Costs affiliated with collecting and entering HMIS data are eligible, including use of an HMIS Comparable Database for Victim Service Providers or organizations exclusively serving survivors of Domestic Violence.

D. Administrative Costs

- Admin provides funding for your agency to manage the grant including drawing down funds and reporting to HUD.
- The Admin amount can be up to 10% of the total grant amount, less Admin.
- Eligible administrative costs are limited to: general management, oversight and coordination of the grant; training on CoC requirements; and environmental review. Admin costs do not include staff and overhead costs directly related to carrying out eligible activities, as these are eligible under the corresponding Budget Line Items.
- Please review 24 CFR § 578.59⁹ for more information about eligible administrative costs.

E. Other Eligible Costs

- **VAWA Costs:** Costs related to the following VAWA-related activities:
 - Facilitating Emergency Transfer Plans for project participants, including: moving costs, travel costs, security deposits, utilities, housing fees, case management, housing navigation, and technology to make an available unit safe.
 - Monitoring compliance with VAWA confidentiality requirements, including:
 - Monitoring and evaluating compliance with VAWA confidentiality requirements
 - Developing and implementing strategies for corrective actions and remedies to ensure compliance
 - Program evaluation of confidentiality policies, practices, and procedures.
 - Training on compliance with VAWA confidentiality requirements
 - Reporting to Collaborative Applicant, HUD, and other interested parties on compliance with VAWA confidentiality requirements
 - Costs for establishing methodology to protect survivor information
 - Staff time associated with maintaining adherence to VAWA confidentiality requirements
 - While the CoC is not limiting this budget line item to Victim Services Providers, both Victim Services Providers and non-Victim Services Providers must provide a

⁹ <https://www.ecfr.gov/current/title-24/subtitle-B/chapter-V/subchapter-C/part-578/subpart-D/section-578.59>

justification for why they are requesting this budget line item, and how the activities will be carried out. This information will be requested within the budget template form.

- **Rural Costs:** The NOFO indicates that this budget line item can be used for the following activities, if the project is operating in a rural area as defined by HUD:
 - Eligible costs include:
 - Payment of short-term emergency lodging, including in motels or shelters, directly through vouchers.
 - Repairs to units in which homeless individuals and families will be housed; or are currently not fit for human habitation.
 - Staff training, professional development, skill development, and staff retention activities.
 - Providers requesting this budget line item must provide justification for why they are requesting this budget line item, and how the activities will be carried out. This information will be requested within the budget template form.
 - The list of HUD-defined rural counties can be found here:
<https://www.hud.gov/sites/dfiles/CPD/documents/CoC/FY25-CoC-Rural-Area-Geocode-Report.pdf>.

Further detail from HUD about eligible activities can be found in the CoC Virtual Binders¹⁰ and in the CoC Interim Rule Subpart D – Program Components and Eligible Costs¹¹.

It is the responsibility of the project applicant that they are submitting applicants with only eligible budget line items.

VI. Applicant Selection Process

All Preliminary Applications will be reviewed by the CA Staff and Independent Review Team (IRT) based on the following criteria.

A. Threshold Verification Review

Applicants under this funding opportunity are limited to one Threshold Verification submission per organization. Applicants who are unable to satisfy the Threshold Requirements outlined below in their original submission will not be permitted to resubmit a new or modified

¹⁰ <https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-eligible-activities/coc-eligible-activities-overview/>

¹¹ <https://www.ecfr.gov/current/title-24/subtitle-B/chapter-V/subchapter-C/part-578/subpart-D>

Threshold Verification under this opportunity, and will not move forward to the Full Application stage.

In order to be considered, Applicants must adhere to the following guidelines:

1. Projects must be submitted by an eligible applicant (non-profit, state or local government or instrumentality of state or local government, public housing authority).
 - i. Per HUD, faith-based organizations may apply on the same basis as any other organization.
2. Applicants must satisfy all of HUD's terms as set forth in the NOFO (e.g., active SAM registration, valid UEI, etc.).
3. Applicants and proposed sub-recipients must agree to the expectations outlined in the [TX BoS CoC Expectations Form](#).
4. Applicants are limited to one Threshold Verification submission per organization. Applicants who are unable to satisfy the Threshold Requirements outlined in this section in their original submission will not be permitted to resubmit a new or modified Threshold Verification under this opportunity, and will not move forward to the Full Application stage.
5. Submit only one (1) new project application.
6. Applicants must have experience working with the population to be served.
7. Applicants must propose eligible activities and show a sufficient understanding of CoC Program. Submissions that reflect a gross misunderstanding of the purpose of the CoC Program or the allowable uses of CoC Program funds will not move forward to the full application, and therefore will not be scored or ranked.
8. Proposed projects must only serve counties within the TX BoS CoC.
9. The CoC will not accept applications that contain requests for construction, acquisition, rehabilitation, or any activity prohibited under [24 CFR 578.87](#).
10. The total request for a New project application must be equal to or greater than \$200,000, but less than \$750,000, excluding the matching requirements.
11. **Transition Grant Applicants only:** The total request for a Renewal Project applying for a Transition Grant must be equal to the dollar amount published on the [FY25 Grant Inventory Worksheet \(GIW\)](#) for the applicable project (i.e., Column Y, "Total ARA" of the FY25 GIW.)
12. The maximum request for HMIS must be no more than 3% of the total of all other budget line requests from HUD, and cannot exceed \$15,000 per application, whichever is less.
13. Applicant's total budget request must not be more than 50% of the most recently approved (by the Board, Membership, Voters, etc.) Agency operating budget.
14. Applicant must request Supportive Services as a Budget Line Item in the Application.

15. **Transitional Housing Applicants only:** No more than 2:1 ratio of supportive services to housing budget is permitted. Example: if Leasing Budget is \$100,000, the maximum Supportive Service Budget Line must be \$200,000.
16. Applicant must account for the required 25% CoC Program Match requirement.
17. **DV Bonus Applicants only:** Applicants to the DV Bonus category of funding must be a Victim Service Provider as defined by HUD at 24 CFR 578.3. That is a private non-profit, whose primary mission must be to serve Survivors of domestic violence, dating violence, sexual assault or stalking. Such Providers may also serve persons fleeing human trafficking, but **may not** exclusively target people fleeing or attempting to flee human trafficking. Similarly, DV Bonus Applicants must be currently participating in a comparable database recognized by HUD as such, at the time of application submission.
18. Service Participation - All projects must require program participants to engage in supportive services (e.g., case management, employment training, substance use treatment) consistent with 24 CFR 578.75(h), documented in occupancy agreements or equivalent.
19. Substance Use Treatment - All projects must demonstrate access to or partnerships for behavioral health and substance use treatment services.
20. **Street Outreach Applicants only:** Collaboration with Law Enforcement - All projects must demonstrate partnerships with law enforcement and first responders to engage unsheltered individuals and assist enforcement of local laws (e.g., public camping, drug use) while connecting people to housing and services.

B. Scoring Criteria/Evaluation Factors

Projects will be scored based on several factors, including, but not limited to, the following:

- Demonstration of need, through both data and narrative.
- Geographic area: Preference given to projects that can clearly support the need for the project within a specific geographic area or can serve multiple counties.
- Organizational capacity to operate a CoC-funded project, including fiscal capacity and grant management capacity.
- Strategic leveraged partnerships with housing or healthcare providers, including:
 - the ability to document leveraged housing cost (e.g., 25% or more of your housing costs from community housing partners)
 - the ability to document leveraged healthcare/services cost (e.g., 25% or more of your budget leveraged from community service partners)
- Alignment with HUD and CoC Priorities.
- Implementation of best practices and program requirements.

- History of effectively administering funds.
- Experience of the Agency serving the target population.
- For current and previous CoC/ESG project providers, considerations will include meeting HUD's grant management requirements, implementation of HUD's policy priorities, and performance outcomes of current/previous grants.
- Experience with and plan for supporting exits to permanent housing.
- The project will be supplemented with resources from other public or private sources, that may include mainstream health, social, and employment programs such as Medicare, Medicaid, SSI, and SNAP.
- **Transitional Housing Projects:** Demonstrate that the proposed project will require program participants to take part in supportive services (e.g. case management, employment training, substance use treatment, etc.) in line with 24 CFR 578.75(h) by attaching a supportive service agreement (contract, occupancy agreement, lease, or equivalent).
- **Transitional Housing Projects:** Whether the proposed project will provide 40 hours per week of customized services for each participant (e.g. case management, employment training, substance use treatment, etc.).
 - The 40 hours per week may be reduced proportionately for participants who are employed.
 - The 40 hours per week does not apply to participants over age 62 or who have a physical disability/impairment or a developmental disability (24 CFR 582.5) not including substance use disorder.
- **Street Outreach Projects:** History partnering with first responders and law enforcement to engage persons living unsheltered and support them to access emergency shelter, treatment programs, reunification with family, transitional housing or independent living.

Additional Notes:

- Scoring criteria and requirements vary by project type (e.g., TH, SSO-SO, etc.).
- New Project Applicants must score at minimum 70% of the total points available for that project type to be eligible for inclusion in the CoC's Priority Listing.

Please note that the score awarded to each applicant via the Independent Review Team (IRT) is one component of how the Non-Conflicted Members of the CoC Board will determine new projects that are selected to be submitted for funding under the CoC Competition. The Non-Conflicted Members of the CoC Board will also factor in need for the project based on gaps analysis data, when compared to other projects submitted under this RFP, as well as prior performance of the applicant operating CoC or ESG-funded projects.

For more details regarding scoring, see the **Review and Scoring Policy** in the [TX BoS CoC Competition Policies](#).

C. Evaluation Process

The TX BoS CoC Local Application evaluation process is designed to ensure transparency, consistency, and alignment with HUD priorities. Applications are reviewed in multiple stages by both the CA and an Independent Review Team (IRT), with each step contributing to the final scoring and ranking outcomes.

Evaluation Components Include:

- **Threshold Review:** Conducted by the CA to confirm basic eligibility and completeness. This review must be completed before applications advance to full evaluation.
- **Completeness and Quality Review:** The CA assesses whether all required components are submitted and whether responses meet minimum quality standards.
- **Independent Review Team (IRT) Scoring:** Applications are reviewed and scored by trained reviewers using a standardized rubric. The IRT is a group of trained, unaffiliated reviewers who live or work in the TX BoS CoC geography and have no ties to CoC-funded agencies.
- **Scoring Reconciliation:** The CA reconciles scores to ensure consistency and resolve any discrepancies.
- **Ranking Scenarios:** Based on final scores and other considerations, the CA develops ranking scenarios for CoC Board review and approval. These scenarios determine which applications are included and prioritized in the CoC Priority Listing submitted to HUD in the Consolidated Application.

Additional Notes:

- Applications are evaluated based on both the **e-snaps submission** and the materials uploaded in **SMA**. Incomplete or inconsistent submissions may result in lower scores or exclusion from the CoC Priority Listing.
- The evaluation process includes limited opportunities for Applicants to submit corrections and respond to feedback. However, deadlines are firm, and extensions are limited to specific non-scored components if necessary.
- All Applicants will be notified of whether their application will be included in the CoC Priority Listing prior to submission of the CoC Consolidated Application.
- Applicants may submit grievances related to scoring or ranking decisions.
 - **Grievances related to scoring** will be conducted by CA staff through SM

- **Grievances related to ranking decisions** must follow the **Grievance Policy** in the [TX BoS CoC Competition Policies](#).

For more details regarding evaluation and ranking, see the **Review and Scoring Policy** and **Ranking Policy** in the [TX BoS CoC Competition Policies](#).

D. Deficiencies

During the **Quality Review** (see **Review and Scoring Policy** in [TX BoS CoC Competition Policies](#)), CA staff will check applications and uploaded documents for completeness and accuracy. If deficiencies are found, the application will be returned to the Applicant in **SurveyMonkey Apply** (more details below), and in **e-snaps** if needed.

- Both the **Authorized Representative** and the **Secondary Contact Person** listed in the application will be notified in writing.
- Applicants will be notified of deadline to correct and reupload revised documents.
- The final deadline to submit corrections is **Monday, December 22, 2025 at 4:59 PM CST**.

Uncorrectable Deficiencies

Some issues cannot be fixed and will result in the application being rejected:

- Submitting an **extension request** that does not follow the required format
- Failing to meet the eligibility requirements outlined in this RFP and HUD's NOFO

VII. Budget & Financial Requirements

A. Budget Guidance

Applicants must structure their budgets according to HUD and CoC standards. The following guidance applies:

- Minimum and Maximum Request
 - Total HUD request must be $\geq \$200,000$ and $\leq \$750,000$ (excluding match).
- Match Requirement
 - Applicants must account for the 25% match for all budget line items except Leasing, as required in the CoC Program.
 - Match can be cash or in-kind and must support eligible activities.
- Housing vs. Supportive Services Ratio
 - For Transitional Housing projects, Supportive Services cannot exceed a 2:1 ratio to housing costs.
 - Example: If Housing costs = \$100,000, Supportive Services cannot exceed \$200,000.

- Administrative and HMIS Costs
 - Admin costs cannot exceed 10% of the total grant amount (excluding Admin).
 - HMIS costs cannot exceed 3% of the total HUD request or \$15,000, whichever is less.
- Eligible Line Items (see Section V. of this RFP for more detail)
- Prohibited Costs
 - Construction, acquisition, and rehabilitation.
 - Any costs not listed as eligible under 24 CFR 578 Subpart D.

B. Match

All CoC Program recipients and subrecipients must provide a **25% match** for all grant funds **except leasing costs**. Match may be either **cash or in-kind contributions** from other sources and must support **eligible activities** under Subpart D of 24 CFR 578. Match is calculated **per project grant**.

Key Points:

- HUD will not release funds until it confirms that the match requirement is met.
- Insufficient match is a common HUD monitoring finding – document carefully.

Eligible Match Examples (non-exhaustive):

- Food (groceries and prepared meals)
- Rental assistance from other sources (must meet CoC requirements)
- Security deposits (must comply with Texas Property Code)
- Unreimbursed admin or indirect costs (if properly documented)
- Value of free or reduced-rate supportive services (e.g., counseling, medical care)

Ineligible Match Examples (non-exhaustive):

- Clothing
- Cleaning supplies
- Other CoC Program funds
- Cash used for ineligible activities
- Restricted-use funds
- Costs for individuals not enrolled in the project

Documentation Requirements:

- All match contributions must be verifiable and documented.

- For **third-party in-kind match**, an executed **MOU** must be attached to the esnaps Project Application.

VIII. Leveraging Housing and Healthcare Resources

HUD is providing CoCs with additional points for submitting new housing project applications that utilize non-CoC resources to cover housing and healthcare costs. Transitional Housing applicants that can demonstrate housing and healthcare leveraging commitments that meet the requirements below will receive additional points in the new project selection process. To receive these points in the TX BoS CoC's new project scoring process, applicants **must upload preliminary commitment letters** with their application in SMA and be prepared to formalize these commitments post-award.

Housing Resource Leveraging

- **Requirement for Points:** Transitional Housing projects must demonstrate leveraged commitments to housing subsidies or subsidized housing units for **at least 25% of the total units** in the project.
- **Example:** A proposed project with 12 total units must show that at least 3 units are supported by non-CoC housing subsidies or commitments to meet the 25% threshold.
- **Eligible Housing Resources may include:**
 - Private organizations, state/local government, Public Housing Agencies, including use of a set aside or limited preference, Faith-Based organizations, and/or Federal programs other than the CoC or ESG Programs.
 - Examples:
 - Allocation of Section 8/ Housing Choice Vouchers from your local Public Housing Authority (instead of CoC-funded Rental Assistance).
 - Allocation of units at a Low Income Housing Tax Credit building that provides subsidized housing.
 - Other opportunities as outlined in the FY2025 NOFO.
- **Preliminary Commitment Letter Guidelines:**
 - Is on partner's letterhead
 - Signed and dated by an authorized representative
 - Includes:
 - The **type and source** of the benefit (e.g., vouchers, units available, etc.)
 - The **project name** (used consistently across all application materials)
 - The **dates** the benefit will be available (aligned with project dates in e-snaps)
 - The **estimated value** of the benefit in dollars or units

- A statement that the benefit is **exclusively for project participants**
- Indicate a total value of the leveraged benefit must equal **at least 25% of the total HUD funding request** (*Formula: Total leveraged value ÷ Total HUD request x 100 ≥ 25%*)

Healthcare Resource Leveraging

- **Requirement for Points:** Transitional Housing projects must demonstrate one of the following:
 - For an organization that provides substance use disorder treatment or recovery services: the leveraged resource provides access **to all participants who qualify for those services; or**
 - For healthcare or behavioral health resources: the value of assistance being provided is **at least 25% of the funding being requested by the project.**
- **Eligible Healthcare Resources:**
 - Direct contributions from a public or private health insurance provider to the project, or provision of health care services by a private or public organization tailored to the program participants of the project.
 - Eligibility for the project must be based on HUD CoC Program fair housing requirements and cannot be restricted by the health care service provider.
- **Examples of Healthcare Partners:**
 - Local Mental/Behavioral Health Authorities (LMHA/LBHA)
 - Local hospitals or health systems
 - Public Health Departments
 - Substance use treatment providers
 - Federally Qualified Health Centers (FQHCs)
 - Healthcare for the Homeless (HCH) Recipients
- **Preliminary Commitment Letter Guidelines:**
 - Separate letter on partner's letterhead
 - Signed and dated by an authorized representative
 - Includes:
 - The **type and source** of the benefit (e.g., mobile clinics, weekly behavioral health visits, etc.)
 - The **project name** (used consistently across all application materials)
 - The **dates** the benefit will be available (aligned with project dates in e-snaps)
 - The **estimated value** of the benefit in dollars or units
 - A statement that the benefit is **exclusively for project participants**
 - Applicants must indicate either:

- For healthcare resource that is substance use disorder treatment or recovery services: a statement confirming access for all eligible participants, or
- For healthcare or behavioral health resources: a total leveraged value of **at least 25% of the total HUD funding request** (*Formula: Total leveraged value ÷ Total HUD request x 100 ≥ 25%*).

IX. Additional Considerations

In addition to meeting basic eligibility and submitting a complete application, applicants must adhere to several federal and local requirements that may affect project design, partnerships, and documentation. These considerations reflect HUD priorities and TX BoS CoC standards and may influence scoring, ranking, or eligibility.

This section outlines key expectations related to subrecipient eligibility, certification with the Consolidated Plan, applicant conduct, and ethical standards. Applicants are strongly encouraged to review each subsection carefully and plan ahead to ensure compliance throughout the application process.

A. Recipients & Subrecipients

In general, Applicants to the CoC Program are permitted to sub-award CoC Program funding if awarded, with some important caveats. The Subrecipient must be an eligible entity and pass all threshold verification. HUD and the CoC will assess Subrecipient eligibility. For-profit entities are not eligible for sub-award, with no exception. The Subrecipient must be identified at the time of the initial application, and sufficient information necessary to determine their eligibility must be disclosed in both Apply and E-snaps.

In situations where all project activities are sub-awarded, Applicants are not relieved of their obligation to the Federal Government. Pass-through entities (Applicants making sub-awards) are subject to additional requirements at 2 CFR 200.331, 200.332 and 200.233. [Please be aware of the distinction between a subrecipient and subcontractor, as there are different implications for the Recipient or pass-through entity.](#)

B. Applicant Conduct

Organizations applying for CoC Program funding – as well as CoC Board Members, Independent Review Team Members, CA Staff, and other Covered Persons as defined in **24 CFR 578.95(d)(1)** - are subject to federal **Conflict of Interest** requirements under **24 CFR 578.95**. This includes involvement in solicitation development, scoring, application evaluation, or any activity that may present a perceived conflict.

If a Covered Person is found to have a conflict that compromises ethical decision-making during the application process, the CA may take corrective action, including removal of the individual, an application, or evaluations.

Applicants must have a **Code of Conduct** on file with HUD or upload an acceptable version to their Applicant Profile in **e-snaps**. Applications lacking a Code of Conduct – or containing one that is grossly inadequate – will not pass Quality Review.

For more details of **Code of Conduct requirements**, see [HUD's Code of Conduct Guidance linked here](#).

Applicants, through their authorized representatives, must not omit or obscure information to conceal negative performance or capacity issues. **Intent is not considered**; ethical behavior is required. If the CA or CoC Board reasonably determines that information was withheld or misinterpreted, actions may include application rejection and reporting to appropriate agencies.

C. Use of Artificial Intelligence (AI) in Application Preparation

The TX BoS CoC acknowledges that applicants may use AI tools to support application development, including drafting narratives, data analysis, or organizing content. While AI can assist with drafting and organizing content, applicants are responsible for ensuring that all submitted materials reflect accurate, ethical, and original work.

AI-generated content must not:

- Misrepresent data, understanding of proposed project design, or organizational experience and capacity
- Obscure performance issues or eligibility concerns
- Demonstrate a lack of understanding of CoC Program requirements and priorities

Applications that appear to be entirely AI-generated and lack specificity or accuracy may be flagged during the Quality Review. If content reflects a gross misunderstanding of the CoC Program, the application may be excluded from scoring and ranking.

The CA does not rely solely on AI detection tools for disqualification, due to known limitations and fairness concerns. Applicants should treat AI as a support tool – not a substitute for informed, ethical application development.

X. Questions and Resources

If you have questions about this RFP, please send an email to txboscoc@thn.org.

XI.Appeals

More information about the CoC Local Application Process, including appeals and ranking, can be found in [TX BoS CoC Competition Policies](#). Instructions for applicable appeals to HUD can be found in HUD's NOFO.

XII. Post-Award Process and Expectations

HUD will notify applicants of the outcome of the FY2025 CoC Program Competition through a **Notice of Conditional Award**, typically issued several months (i.e., three or more) after the HUD submission deadline published in the NOFO. Once notified, CA staff will reach out to the authorized contacts to:

- Collect signatures on the FY25 CoC Expectations Form
- Schedule "Start-up" Technical Assistance

Important: Inclusion in the TX BoS CoC Priority Listing does NOT guarantee funding. No agency – including THN as the CoC Lead Agency – is guaranteed an award, and no CA staff member can make such assurances.

Meeting the Terms and Conditions of the Conditional Award outlined by HUD is the **sole responsibility of the applicant**, though CA staff are available to provide guidance through the process. The post-award phase may take several months, depending on HUD's conditions. Projects that are conditionally awarded must execute a contract that complies with all HUD requirements. Applicants that are unable to execute a contract will not go to award, and conditionally awarded funds will be recaptured by the U.S. Treasury.

To learn more, refer to HUD's CoC Program Recipient Post-Award User Guide, which is updated annually and shared directly with conditionally awarded recipients. While each version may vary slightly, prior editions contain materially similar guidance.

Due to the lengthy nature of the post-award process, applicants selected for **Tier 2** are encouraged to begin preparing for award immediately after the TX BoS CoC Local Application Process concludes. CA staff are available to assist upon request.

Preparing for a Federal Award

Each conditionally awarded applicant will have unique requirements based on their project and proposed activities. Common post-award conditions may include:

- Developing compliant financial and programmatic Policies and Procedures (per 24 CFR 578 and 2 CFR 200)
- Updating the organizational Code of Conduct

- Demonstrating sufficient Match sources
- Executing MOUs for third-party in-kind Match contributions
- Clarifying target population eligibility
- Defining service delivery structure
- Correcting unit/bed configuration discrepancies
- Removing ineligible costs from the budget
- Addressing any other HUD-imposed conditions to demonstrate capacity