



FY 2025 HUD Continuum of Care Competition

TX-500: San Antonio and Bexar County CoC Request for Proposals and Local Competition Guidelines

Request for Proposals Release Date: Monday, November 24, 2025

Local Application Deadline for all Projects: Thursday, December 11th by 5pm

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CoC Program Grant Overview

In 2009, the Homeless Emergency Assistance and Rapid Transition to Housing Act (HEARTH) was enacted into law and codified the Continuum of Care (CoC) planning process. In 2012, the federal department of Housing and Urban Development (HUD) released the CoC Program Interim Rule, which focuses on the regulatory implementation of the CoC Program, whose purpose is defined by HUD as, "...address[ing] the critical problem of homelessness through a coordinated community-based process of identifying needs and building a system of housing and services to address those needs".¹ The San Antonio and Bexar County region, known by HUD as TX-500, is overseen by the CoC Board of Directors, who fulfill the requirements of a CoC as outlined in the CoC Program Interim Rule. For more information on the governing bylaws of the CoC Board of Directors, refer to the Close to Home Nonprofit Bylaws and CoC Governance policy.

Responsibilities of a CoC include preparing and overseeing an application for funds under the CoC Program Grant and the establishment and operation of a centralized or coordinated assessment system for individuals and families in need of housing and services provided through CoC or Emergency Solutions Grant (ESG) funding.

Close to Home is designated by the CoC Board of Directors as the Collaborative Applicant for the TX-500 San Antonio and Bexar County Continuum of Care. Provisions at 24 CFR 578.9 require CoCs to design, operate and follow a collaborative process for the development of an application in response to a [Notice of Funding Opportunity \(NOFO\)](#) for the CoC Program Grant issued by HUD. CoCs must implement local competition deadlines to ensure transparency and fairness at the local level. As the Collaborative Applicant, Close to Home applies to HUD for CoC Program Grant funding on behalf of the community. Except for the amount of the HUD CoC allocation available to Close to Home and cost eligibility, the CoC Board of Directors is the ultimate decision-maker in the local review process.

CoC Notice of Funding Opportunity (NOFO)

Each year, the U.S. Department of Housing and Urban Development (HUD) releases the Continuum of Care (CoC) Program Notice of Funding Opportunity (NOFO). In Fiscal Year (FY) 2024, TX-500 CoC was awarded over \$22 million in homeless services funding to support permanent supportive housing, rapid re-housing, transitional housing, supportive services, and CoC infrastructure projects like HMIS (Homeless Management Information System), Coordinated Entry, and planning.

The competitive application requires each CoC to rank, score, and select new and renewal projects according to HUD's funding priorities and project performance. This Request for Proposal (RFP) packet includes a [FY25 Local Competition Timeline](#) which details how the San Antonio and Bexar County CoC will evaluate renewal projects for reallocation, score and rank renewal and new projects, and make the application process available to the community.

This process invites applications from organizations that have not previously received CoC funding. The [Fiscal Year \(FY\) 2025 CoC NOFO](#) funds the renewal of existing CoC grants, including DV Renewal projects and projects originally funded under the Special NOFO to Address Unsheltered and Rural Homelessness, and the competitive renewal or replacement of existing YHDP grants that are expiring in calendar year 2026. It is expected that all agencies applying for new or renewal project funding read the FY25 NOFO and available HUD resources at the [HUD website](#). The FY25 NOFO is referenced throughout this document, along with relevant section references. You can find additional resources on the [United States Interagency Council on Homelessness website](#) as well as the [National Alliance to End Homelessness website](#), to help support your application.

The FY 2025 CoC NOFO contains critical changes to HUD funding priorities and NOFO processes. Review a summary of these changes in the [Critical Changes from Last Year's NOFO](#) Section of this RFP. Although the FY 2024 NOFO was initially intended to be a two-year NOFO, with the same awards made for FY 2024 and FY 2025, HUD indicated that the FY25 NOFO released on November 13, 2025 “rescinds and supersedes any mention of awards in the FY 2024 and FY 2025 Continuum of Care Competition and Renewal or Replacement of Youth Homeless Demonstration Program Grants published on July 31, 2024 and includes several changes” (p. 15 of FY25 CoC NOFO). As a result, **this local RFP process includes significant changes to the scoring methodology compared to prior-year competitions to align with HUD's criteria.**

FY25 NOFO Timeline

The TX-500 Local Competition Timeline has been established based on the requirements outlined in the FY25 NOFO. Dates not required by the NOFO are subject to change.

2025 Local Competition Timeline	
November 20th	Grant Conference
November 24th	Request for Proposals (RFP) released
December 1st-3rd	Virtual Technical Assistance (TA) sessions available by appointment. Please click HERE to schedule
December 1st	Renewal Project Strategy Session
December 11th	Project Proposals (e-snaps* and local application) due to Close to Home by 5pm
December 12th-15th	Internal review of project applications

December 16th-28th	Independent Review Team (IRT) evaluates and scores proposals
December 29th	CoC Board approves ranking and notifies applicants. The RFP and selection process documentation will be retained in accordance with HUD requirements.
December 30th- January 12th	Close to Home technical review and application revision period and final upload into e-snaps
January 13th	Collaborative Applicant (Close to Home) submission of CoC Application to HUD by 5pm
January 14th	Official HUD FY 2025 NOFO Deadline

**As of the release of this RFP, the e-snaps applications have not yet been posted by HUD. CoC applicants will be notified by Close to Home as soon as the e-snaps applications are available on [HUD's website](#).*

FY25 Available Funding

Funding Type	Description	Funding Amount Available
<u>Estimated Annual Renewal Demand (ARD)</u>	The CoC's ARD is calculated by adding the eligible portions of the budgets for the group of grants ready to renew. The CoC will have the opportunity to submit applications based on the amount needed to renew these grants. The ARD is the base amount for which the CoC is eligible to apply and includes the Youth Homelessness Demonstration Program funds.	\$25,014,658
CoC Bonus	This is the maximum amount of bonus funding for which the CoC is eligible to apply (does not include any reallocation).	\$5,002,932
DV Bonus	This is the maximum amount of domestic violence project bonus funding for which the CoC is eligible to apply.	\$2,154,099
CoC Planning Grant	This is the amount for staffing support and funding for the Collaborative Applicant in addition to operations costs for HUD-required CoC activities.	\$1,250,733
Total Amount of Available Funding		\$33,422,422

Additional Significant Funding Notes:

Tier 1 Amount capped at 30% of ARD	\$7,504,397
Permanent Housing Projects capped at 30% of ARD *includes PSH, RRH, and Joint TH-RRH Projects	\$7,504,397

**Funding amounts are subject to change based on the release of HUD's final Annual Renewal Demand Report.*

HUD allows local communities to create new projects through two methods: bonus projects and reallocation. Bonus projects are typically awarded competitively at the national level but are also required to be ranked with the CoC's other renewal and new projects.

Critical Changes from Last Year's NOFO

This section includes excerpts from the 2025 Notice of Funding Opportunity (NOFO) specific to changes in the FY25 NOFO from FY24, found on HUD's Continuum of Care Program Competition website. Close to Home encourages applicants to review the NOFO in its entirety.

Additionally, these materials from the National Alliance to End Homelessness provide a helpful comparison between the FY 24 and the FY 25 CoC NOFO:

- [Full Analysis](#)
- [Overall Side-by-Side Comparison of FY24 to FY25](#)
- [Side-by-Side Scoring Comparison of FY24 to FY25](#)

Priority Shifts

HUD replaced the FY 24 NOFO priorities with six new priorities (p. 12-13 of HUD NOFO) and detailed in the [FY25 HUD Policies Priorities](#) section of this RFP.

Changes to Tiering and Ranking

- **The CoC's Tier 1 projects are capped at 30% of ARD** (in FY24, Tier 1 projects were capped at 90%). Therefore, Tier 1 projects will be limited to \$7,504,397 (p. 15 of FY25 NOFO)
- This change means that a majority of projects will be ranked in Tier 2, and these projects will compete nationally for awards.
- HUD will competitively award all DV and YHDP projects, including renewal and replacement YHDP projects. In the FY24 NOFO, YHDP programs were not competitively ranked.

Cap on Permanent Housing Funding

- **No more than 30% of the ARD can be used for permanent housing projects**, including PSH, RRH, and Joint TH-RRH projects. (p. 15 of FY25 NOFO)

- For the San Antonio and Bexar County CoC, this means that \$7,504,397 is the maximum amount of funding available for permanent housing, which is a significant reduction from FY24.

New Project Quality Threshold and Criteria

- HUD will review all new project applications to determine if they meet 1) project threshold criteria and 2) project quality threshold requirements.
- HUD’s project threshold criteria include that projects certify to the following (p. 54 of FY25 CoC NOFO):
 - “The project applicant will not engage in racial preferences or other forms of illegal discrimination.”
 - “The project applicant will not operate drug injection sites or “safe consumption sites,” knowingly distribute drug paraphernalia on or off of property under their control, permit the use or distribution of illicit drugs on property under their control, or conduct any of these activities under the pretext of “harm reduction.”
- HUD’s project quality threshold criteria (starting on page 55 of the FY25 NOFO) are specific to the project type but, among other criteria, require projects to demonstrate that program participants are required to participate in supportive services by providing evidence such as a lease agreement; transitional housing providers must provide 40 hours/week of services; and new PSH must serve elderly individuals and individuals with physical or developmental disabilities.

HUD Disqualifications and Risk Review (p. 89 of FY 25 NOFO)

- HUD may reject applicants during the HUD Risk Review process for evidence (including previous application materials, public sources (including news media), or complaints) of “a history of subsidizing or facilitating activities that conflict with the purposes of this NOFO.”
- HUD reserves the right to evaluate project eligibility if there is evidence the project “has previously or currently conducts activities that subsidize or facilitate racial preferences or other forms of illegal discrimination or conduct activities that rely on or otherwise use a definition of sex other than as binary in human,” or “evidence that the project operates drug injection sites or “safe consumption sites,” knowingly distributes drug paraphernalia on or off of property under their control, permits the use or distribution of illicit drugs on property under their control, or conducts any of these activities under the pretext of “harm reduction.” (p.55 of FY25 NOFO)

New Merit Review Process (replacing the CoC Application Scoring Process)

- HUD’s Merit Review replaces the CoC Application Scoring used in prior competitions as the method HUD will use to evaluate and score the CoC’s overall application.
- HUD removed Rating Factors previously used in CoC Application Scoring such as those related to Housing First and equity.

- HUD added Rating Factors (p. 66-88 of the FY25 NOFO) such as the presence of substance use treatment centers and detox centers in the geographic area, local laws that prohibit public camping, requirements to participate in supportive services, and collaboration with law enforcement.

Emphasis on Supportive Service Requirements

The CoC's application as a whole, as well as individual projects, earns more points from HUD if they require supportive services. In practice, the threshold and scoring system require that all, or a majority of, projects require participation in supportive services to receive funding. The following is relevant language on service requirements from 24 CFR 578.75(h):

- **“Supportive service agreement.”** 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 program.”

Cost of Living Adjustments for Conditionally Selected Grants

HUD will adjust amounts for the supportive services and HMIS Cost budget line items for renewing projects by the following factor: Most recent three-year average of changes in State Quarterly Census of Employment and Wages (QCEW) for the category Social Assistance (NAICS 624). Data can be found at: <https://www.bls.gov/cew/data.htm> (p. 94 of FY 25 CoC NOFO)

FY 2025 HUD Policy Priorities

Below is a summary of HUD's Policy Priorities as outlined on pages 12-13 of the FY25 NOFO.

1. **Ending the Crisis of Homelessness.** HUD directs CoCs to allocate resources towards outreach, intervention, and assistance that helps people regain self-sufficiency. HUD directs CoCs to work with law enforcement, first responders, and their state and local governments to reduce encampments, public camping, and public drug use in order to address barriers to maintaining housing and increasing self-sufficiency.
2. **Prioritizing Treatment and Recovery.** HUD outlines that CoCs should prioritize projects that provide the treatment and services people need to recover and regain self-sufficiency including on-site behavioral health treatment, robust wraparound supportive services, and participation requirements. The FY 25 NOFO devotes resources to Transitional Housing programs and Supportive Service Only projects with

the goal of improving health and long-term economic independence. HUD encourages CoCs to utilize the full array of mainstream programs and local and private resources to provide housing and healthcare needed to maintain safe and stable housing.

3. **Advancing Public Safety.** HUD indicates that CoCs should cooperate with law enforcement. HUD encourages CoCs to assist in preventing and minimizing the trauma associated with living on the streets or in encampments, especially for women and youth that are the victims of sexual assault and trafficking.
4. **Promoting Self-Sufficiency.** HUD directs CoCs to partner with workforce development centers, employers, childcare, and other supportive service providers to increase employment and employment income for program participants. CoCs should prioritize projects that help lead to long-term economic independence for individuals and families to exit homelessness and prevent future returns to homelessness.
5. **Improving Outcomes.** HUD indicates that CoCs should review all projects eligible for renewal to determine their effectiveness in reducing homelessness and increasing self-sufficiency. CoCs should prioritize projects that promote self-sufficiency, increase employment income over government assistance, and promote treatment and recovery.
6. **Minimizing Trauma.** HUD outlines that CoCs should encourage providers to provide trauma-informed care and ensure participant safety in programs, especially for youth and survivors of domestic violence, dating violence, sexual assault, and stalking. Women experiencing homelessness or domestic violence should have access to safe spaces.

Eligible Project Components

The TX-500 CoC supports HUD's policy priorities as outlined in the FY25 NOFO and has aligned the local application, rank and review policies with FY25 NOFO Goals and Objectives.

Given the shift in HUD priorities for funding and the CoC's local priorities and needs, TX-500 will accept applications for the following project types. All Applicants should closely review the [Local CoC Program Priorities](#) before designing projects and completing applications.

Renewal Applications For:

- Permanent Supportive Housing (PSH)
- Transitional Housing (TH)
- HMIS (HMIS Lead is the only eligible applicant)
- Supportive Service Only (SSO) - Coordinated Entry (CE)

New Applications For:

- Supportive Service Only (SSO) – Street Outreach
- Other Supportive Services Only (SSO)
- Transitional Housing (TH)

Note to Current PSH and RRH Providers:

The changes in the FY25 NOFO significantly shift the funding available for permanent housing projects. In particular, Rapid Rehousing (RRH) and Joint TH-RRH projects are **very unlikely to be awarded** due to the 30% cap on permanent housing.

Providers with permanent housing projects currently receiving CoC funds are encouraged to connect directly with Close to Home to discuss all possible options (see [Application Type Overview](#) for more details).

Reallocation is a process CoCs use to shift funds in whole or in part from existing eligible renewal projects to create one or more new projects without decreasing the CoC's ARD. Given the 30% of ARD cap on permanent housing, permanent housing applications that are **NOT** selected for renewal will be reallocated for the CoC to use for new TH and SSO project types.

Below are definitions for each project type, key changes, and implications for the local competition process.

Permanent Housing (PSH, RRH, TH-RRH)

- The FY 25 CoC Program Competition significantly limits permanent housing projects to 30% of the ARD.
- HUD requires that new PSH must serve elderly or physically disabled individuals (not including those with substance use disorder) with required services. HUD will not accept new TH-RRH projects.

Permanent Housing Definitions: HUD considers the following project types to be permanent housing:

- **Permanent Supportive Housing (PSH):** Permanent Supportive Housing (PSH) is permanent housing in which housing assistance (e.g., long-term leasing or rental assistance) and supportive services are provided to assist households with at least one member (adult or child) with a disability in achieving housing stability.
- **Rapid Rehousing (RRH):** RRH is permanent housing that provides short-term (up to three months) and medium-term (4-24 months) tenant-based rental assistance and supportive services to households experiencing homelessness.
- **Joint Component - Transitional Housing and Permanent Housing – Rapid Re-housing (TH-RRH):** Project that combines the activities of a transitional housing project with those of a rapid re-housing project. These projects provide a safe place for people to stay – transitional housing – with financial assistance and wrap around supportive services determined by program participants to help them move to permanent housing as quickly as possible.

Transitional Housing Projects

The FY25 NOFO is open to new and renewal Transitional Housing (TH) projects, and new TH applications are strongly encouraged as project submissions. HUD encourages the creation of new Transitional Housing projects and has not placed a cap on the use of funds for TH.

Definition: 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. TH projects can cover housing costs and accompanying supportive services for program participants for up to 24 months.

- Review 24 CFR 578.37(a)(2) and the CoC Program Interim Rule for more information on Transitional Housing requirements and eligibility.
- TH projects are expected to supplement services with public/private resources, including health programs (Medicare, Medicaid), social programs (SSI, SNAP), and employment programs.

Supportive Service Only (SSO) Projects

The FY25 CoC Program Competition is open to new and renewal SSO projects. The CoC's application as a whole, as well as individual SSO Street Outreach projects, earns more points from HUD if Street Outreach projects partner with first responders and law enforcement to increase housing and service engagement.

Definition: 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. The recipient may only assist program participants for whom the recipient or subrecipient of the funds is not providing housing or housing assistance.; can be provided to anyone meeting Category 1 or Category 4 Homeless Status.

In the FY25 NOFO, HUD distinguishes between three different types of SSO projects. HUD established a distinct threshold scoring criteria for each type of SSO project.

- **Supportive Services Only (Street Outreach):** An SSO project primarily dedicated to outreach service activity described in 24 CFR 578.53(e)(13) to individuals and families primarily residing in places not meant for human habitation.
 - 24 CFR 578.53(e)(13) describes outreach services as “activities to engage persons for the purpose of providing immediate support and intervention, as well as identifying potential program participants...” and includes “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.”

- **Supportive Services Only (Coordinated Entry):** An SSO project to develop or operate a Coordinated Entry system, including to implement policies, procedures, and practices that equip the CoC's coordinated entry to better meet the needs of people experiencing homelessness who are experiencing trauma or a lack of safety related to fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking (e.g., to implement policies and procedures that are trauma-informed, client-centered or to better coordinate referrals between the CoC's coordinated entry and the victim service providers coordinated entry system where they are different).
- **Supportive Services Only (Standalone):** This project type covers all other SSO projects types that are not primarily dedicated to Coordinated Entry or Street Outreach, as described in 24 CFR 578.37(a)(3). Eligible supportive services are listed in the CoC Interim Rule and are listed on the HUD website. Examples include case management, education services, employment assistance, legal services, outpatient health services, and utility deposits.

Additionally, the [HUD Exchange Decision Tool](#) provides more information to help distinguish SSO projects from housing projects.

Application Type Overview

Renewal vs. New Projects vs YHDP Replacement/Renewal Applications

Renewal Applications

Renewals applications are for projects that were previously funded, expiring in calendar year 2026, and are applying under the same project type. Apply using the "Renewal Application" template. Renewals applications must:

- Apply for the same project type (e.g.: PSH re-applying as PSH, SSO reapplying as SSO)
- Request the same amount of funding before cost of living adjustments or a lesser amount
 - Non-significant changes (10% of funds from one activity to another) to budget unless there is specific approval (reach out to Close to Home to discuss)
- CoC projects (including YHDP) originally funded in FY 2024 or earlier
- Projects have an expiration date between January 1, 2026, and December 31, 2026
- In the case of DV Renewal projects and YHDP Renewal projects, must continue to serve the same subpopulation.

New Applications

All other projects that do not meet the above description should apply as new projects. Apply using the "New Applicant" form.

Eligible Application Types

Transition Grants (considered New Applications)

Transition grants are a type of new application that is only available to currently funded projects with an expiration date between January 1, 2026, and December 31, 2026 that would like to change project types. A Transition Grant is an application to fund a new CoC project through the reallocation process to transition an eligible CoC renewal project (including a Special NOFO project or DV Renewal project) from one program component to another eligible component over a 1-year period.) The primary advantage is that the operating start date for the new project type would be aligned with the end date of the prior grant. Review p. 44-45 of FY 25 HUD NOFO for more information.

Transition grants require applications using the “New Applicant” form, being sure to fill out the “Transition Grant” section.

The following is required of transition grants:

- The transition grant’s operating start date will be the day after the end of the previous grant term for the expiring component. For transition grants reallocated from more than one project, the operating start date of the transition grant will be the day after the end of the earliest expiring grant term.
- For a new project to be considered a transition grant, the new project applicant must be the recipient listed on the current grant agreement for the eligible renewal grant(s) being eliminated and must include the grant number(s) of the project(s) being eliminated to create the new project and attach a copy of the most recently awarded project application.
- Transition grants will be evaluated by HUD using the threshold quality criteria of new grants.
- DV Bonus and YHDP Renewal project applicants are not permitted to utilize the transition grant application process. YHDP applicants must submit a YHDP Replacement application to change program components.

If a provider wants to be considered for a renewal AND a transition grant, both a renewal application and an additional application using the “New Application” template will be required. This is because HUD considers transition grants to be new projects, and will need to meet the HUD New Project Threshold Requirements.

Youth Homelessness Demonstration Program (YHDP) Renewal or Replacement Applications

YHDP Projects have a distinct application type. Please use the “YHDP Replacement or Renewal” template.

HUD will competitively renew or replace YHDP projects. Additionally, YHDP projects may be reallocated by CoCs to create new YHDP grants. If significant changes to a renewing YHDP

project are needed the YHDP project may replace its current project with a new YHDP Replacement project, that may wholly or in part include activities ineligible under the CoC Program as outlined in section IV.D.1.h of this NOFO. Review p. 38-41 of the F25 CoC NOFO for more information on eligible costs and activities.

- YHDP renewal projects will be accepted – however, they are subject to competition and the same permanent housing caps as all other projects.
- YHDP renewal and replacement projects, including YHDP projects created through reallocation must serve youth aged 24 or younger, including unaccompanied and pregnant or parenting youth.
- YHDP renewal and replacement projects, including YHDP projects created through reallocation may submit applications that include YHDP special activities as outlined in section IV.B.2 of the FY25 NOFO.
- YHDP projects can be replaced to fund new YHDP reallocation projects, but only for the following project types:
 - TH or Crisis Residential Transitional Housing, or housing that using that is short-term, low-barrier, using a congregate living setting, and provides access to the following supportive services in particular: family engagement and unification, case management, emergency triage services and other supportive services whose purpose is to move youth rapidly into stable housing.
 - SSO, including, but not limited to, housing search and placement services, case management, or street outreach.
 - SSO-CE
 - SSO - Host Home and Kinship Care. A model in which a family agrees to permit a youth to reside with them. Recognizing that the addition of another person in the home may increase costs to the family, HUD will entertain applications that propose to house youth with families and to subsidize the additional costs attributable to housing the youth. The residence is in a community-based setting. The family could be related to the youth and the length of stay may be time-limited or without time limits. YHDP funds may be used to subsidize the increased costs to the family that are attributable to housing the youth. An example of eligible costs would be additional food or transportation costs, which are eligible supportive services under 24 CFR 578.53(e)(7) or 24 CFR 578.53(e)(15). Recipients must keep records related to this determination by the recipient for HUD review upon request.
 - HMIS.

Expansion Grant

HUD will allow project applicants to apply for a new expansion project through reallocation, CoC Bonus, YHDP Renewal, and DV Bonus processes to expand existing projects and increase the number of units, persons served, services provided to existing program participants, or to add additional activities to HMIS and SSO-Coordinated Entry projects.

Due to HUD's 30% funding cap on permanent housing, this FY 25 Competition will not allow expansions to PSH, RRH, or Joint TH-RRH projects. Expansions for SSO and TH projects will be considered.

Project applicants intending to submit new project applications for the purposes of expanding an eligible renewal in the CoC Program must indicate how the new project application will expand units, beds, services, persons served, or services provided to existing program participants, or in the case of HMIS or SSO-Coordinated Entry projects, how the current activities will be expanded for the CoC's geographic area; and ensure the funding request for the expansion grant is within the funding parameters allowed under reallocation, CoC Bonus, or DV Bonus available amounts.

To apply for an expansion grant, project applicants must submit separate renewal and new project applications with the expansion section completed. If selected by the Resource Allocation Committee, both renewal and new project will be ranked by the CoC with unique rank numbers.

Review p. 40 of the FY 25 HUD NOFO for more information.

Grant Consolidations

Eligible renewal project applicants may have the ability to consolidate two or more eligible renewal projects (but no more than ten projects) into one project application during the application process, including YHDP. HUD will not permit projects that have the following characteristics to consolidate:

- Different project component types (e.g.: combining PSH and SSO cannot be done through a consolidation)
- Outstanding audit or monitoring findings
- Outstanding obligation to HUD that is in arrears
- Unresolved construction delays
- History of poor financial management/drawdown issues
- History of low occupancy levels, or lack experience in administering the project type
- Other capacity issues
- A YHDP renewal project with a non-YHDP project
- Transitional housing and a permanent housing project, to form a Joint TH and PH-RRH component project
- Transition grants consolidating with any other project

If you are interested in pursuing a grant consolidation, please notify katiehubble@closetohomesa.org as soon as possible and review p. 42 of the FY25 NOFO.

Domestic Violence and CoC Bonus Project Funding

Applicants may apply for new projects using the Domestic Violence (DV) and CoC Bonus Project Funding.

Domestic Violence Bonus Funding

DV Bonus and DV Reallocation may only be used to create new SSO-Coordinated Entry and Transitional Housing (TH) projects. Review p. 36 of the FY 25 HUD NOFO for more information.

DV Bonus funds (\$2,154,099 total available) can be used to expand an existing renewal project only if the expansion project is dedicated to survivors of domestic violence, dating violence, sexual assault, or stalking who qualify under paragraph (4) of the definition of homeless at 24 CFR 578.3.

DV Renewal projects cannot be reallocated to create new non-DV CoC projects.

CoC Bonus Funding

The CoC Bonus allows CoCs to use up to 20 percent of their Final Pro Rata Need (FPRN) to create one or more new project applications (\$5,002,932). New projects created through the CoC Bonus must meet the project eligibility and project quality threshold requirements established by HUD (p.35 of FY25 CoC NOFO).

CoCs may apply for the following types of new CoC projects through the CoC Bonus or CoC Reallocation processes (p. 37 of the FY25 CoC NOFO):

- SSO projects
- TH projects
- Dedicated HMIS project for the costs at 24 CFR 578.37(a)(4) that may only be carried out by the HMIS Lead. Additionally, if the CoC has organizations within its geographic area that are victim service providers, the HMIS Lead, or subrecipient, may request HMIS funds for a comparable database. Victim service providers may also request HMIS funds in their project application budgets to enter data into a comparable database.
- SSO-CE project to develop or operate a Coordinated Entry system

Local CoC Program Priorities

Local Priority Areas for FY25 Competition

Close to Home will prioritize projects that align with the **2026 Alliance Action Plan** focused on homelessness prevention, crisis response, housing solutions, and enhancing system coordination.

Local Priorities for Supportive Service Only (SSO) – Street Outreach Projects:

- Consistent HMIS data entry
- Clinical case management (LMSW, LPCs)
- Coverage of areas outside San Antonio city limits/within Bexar County
- Caseloads focused on individuals with high acuity needs
- Commitment to supporting clients during inclement weather events
- Coordination with Law Enforcement Agencies (HUD Priority)

Local Priorities for Other SSO Projects:

- Projects that focus on housing problem-solving case management for people who are unsheltered or living in emergency shelter.
- Projects that focus on health insurance enrollment and benefit income/SOAR.
- Projects that focus on long-term self-sufficiency through life skills training, financial education, employment opportunities, etc. (HUD Priority)
- Projects that provide support for people with high-acuity medical needs, including those recently discharged from the hospital.
- Projects that support veterans at the point of transition from service to quickly connect to housing opportunities.
- Projects that improve access to substance use treatment or mental health services. (HUD Priority)
- Projects that provide housing navigation for more efficient housing placements.

Local Priorities for Transitional Housing:

- Projects that focus on long-term self-sufficiency through life skills training, financial education, employment opportunities, etc. (HUD Priority)
- Projects that provide support for people with high-acuity medical needs, including those recently discharged from the hospital.
- Projects that improve access to substance use treatment or mental health services. (HUD Priority)
- Projects that enhance services that reduce returns to homelessness from housing programs.

General Priorities:

- Provide safety planning and support for households fleeing domestic violence.
- Ensure continuity for the most vulnerable residents housed in Permanent Supportive Housing.
- Maintain infrastructure to enhance local funding and coordination to fill gaps (HMIS & CE)

Local Project Rank and Review Process

CoC Program Independent Review Team (IRT)

To ensure a fair and impartial project ranking process, an Independent Review Team (IRT) is selected to systematically review and score applications and to recommend a final ranking to the CoC Board of Directors. Close to Home will coordinate IRT meetings and act as the facilitator of the review process.

IRT Member Selection and Criteria

There will be up to two IRT groups, one for new project applications and one for renewal projects, if necessary, with a maximum of five and a minimum of three members per group. Prospective IRT members must apply and be selected by the CoC Board Executive Committee. The CoC Board of Directors will approve the final slate of IRT members. The CoC is committed to ensuring IRT members are representative of the population of people experiencing homelessness in San Antonio and Bexar County. IRT members with lived experience will be prioritized for selection.

An agency can only have one representative on the IRT. IRT members, including members of their immediate families, may not be employees, contractors, or serve in any representative capacity of an applicant, subrecipient agency, or other partner agency as established in a Memorandum of Understanding (MoU) party to a funding application. There is no limit to the number of times a person can serve on the IRT.

Close to Home will provide a required training for IRT members. The IRT will conduct private meetings as needed, which will include Close to Home staff, as part of the project review and selection process. IRT members are required to attend meetings and must coordinate with Close to Home if an emergency arises. Signatures of IRT members are required to confirm project rankings and will be archived.

The CoC Board Executive Committee has the right to remove any IRT members who fail to attend meetings, have a conflict of interest, and/or are not following guidelines outlined in orientation. IRT members will be replaced with another candidate who applied if another member is needed to meet threshold.

IRT Voting Process

IRT members will score applications prior to the first meeting. Any discrepancies will be discussed, and a final score will be voted on. The IRT will be expected to follow a majority vote process to determine final scores if there is not a consensus. In the event of a tie vote, the CoC Board Executive Committee will determine the outcome. The IRT is allowed to request more information from the applicant before making a final determination in accordance with the annual timeline.

CoC Program Application Review Process

The IRT will utilize the scoring rubrics to score each project application. There are two types of applicant scoring rubrics:

- New Projects (including Reallocation, Transition Grants, Expansion Projects, and Consolidated Grants)
- Renewal Projects

See **Appendix A** for scoring rubrics associated with each applicant type. Scoring rubrics will focus on agency experience and capacity, fiscal management and cost effectiveness, project design and services, population served, performance metrics, CoC coordination and engagement, system partnerships, and HUD priorities and requirements.

The CoC utilizes a performance scorecard to assess renewal project performance using data exported from the local HMIS that scores these factors on a 100-point scale. There is a unique scorecard for each project type (PSH, RRH, and TH) and for Victim Service Providers who must use a comparable database (TH and RRH). The scorecards are in [Appendix B](#).

In the absence of historical performance data, new projects will be required to describe the project's ability to enhance the CoC's system performance in the Local Application.

CoC Project Ranking Policy

In the F25 NOFO, HUD requires Collaborative Applicants to rank all approved project applicants, except for CoC Planning Projects.

The CoC has approved scored projects to be ranked in the following order in the priority listing:

- HMIS Renewal Projects
- Coordinated Entry Renewal Projects
- Permanent Supportive Renewal Projects
- Other Renewals and New Projects

This priority project list and the IRT project application scores will determine where a project is ranked. The project ranking will be included in the Consolidated Application to HUD. Projects with equal scores are ranked by project component type. Projects with equal scores of the same component type will be ranked based on cost per client. Consolidated grant performance will be averaged from previous grants and consolidated into one score for ranking.

The CoC Planning Grant is not scored nor ranked but is included in the priority project listing. Only the Collaborative Applicant (CA) can apply for the CoC Planning Grant. All other projects included in the priority listing will be scored and ranked.

The IRT has the authority to override priority ranking scores and adjust individual projects up or down in the ranking in order to fulfill HUD priorities, prevent potential losses of funding, and maximize the overall CoC application score.

Close to Home will prepare the project priority ranking list and funding decisions as recommended by the IRT to the CoC Board of Directors for final approval. The Board of Directors may direct Close to Home to make minor budgetary corrections, as needed, consistent with the FY25 HUD NOFO rules and funds allocated to the CoC. Close to Home will communicate budget adjustments to individual applicants and instruct them to make changes before submitting the final Consolidated Application to HUD.

Local Application Instructions

Eligible Applicants

According to the FY25 NOFO, the following organizations are eligible applicants for CoC funding:

- State governments
- County governments
- City or township governments
- Special district governments
- Native American tribal governments (Federally recognized)
- Public housing authorities/Indian housing authorities
- Native American tribal organizations (other than Federally recognized tribal governments)
- Nonprofits having a 501(c)(3) status with the IRS, other than institutions of higher education
- Faith-Based Organizations

Application Submission Instructions

To apply for the CoC Program NOFO, applicants must:

- Attend the CoC Program NOFO Grant Conference or review the recording:
 - Grant Conference – Thursday, November 20th, at 11:00am - 12:00pm
- Attend a Technical Assistance session with Close to Home between December 1st, 2025 - December 5th, 2025. Sign up link can be found in Appendix B.
- Submit Part I of application (federal questions) via HUD's *e-snaps* portal by the deadline by December 11th, 2025.
- Submit Part II of application (local questions and threshold criteria) via Survey Monkey by December 11th, 2025.

Part 1: e-snaps Application

Once the e-snaps applications are posted by HUD, applicants must determine which *e-snaps* application they should submit. *E-snaps* is HUD's federal portal for submitting applications, which is monitored by the local CoC, Close to Home. [Instructions on how to use e-snaps and the detailed instructions for the application can be located here.](#)

Eligible organizations may submit one or more of the following application types:

- **Renewal Project Application.** Any organization with a CoC-funded grant that expires in calendar year 2026 may submit a renewal application in alignment with the local RFP priorities that is consistent with project information included in the Grant Inventory Worksheet (GIW) and the expiring grant. If a renewal agency wishes to request an expansion, transition, or consolidation, they must follow the instructions in the CoC Program Policies & Procedures.

- **New Project Application.** New project applications may be for any of the eligible new project categories as outlined in this RFP.
- **YHDP Renewal Project Application.** Any organization with a YHDP-funded grant that expires in calendar year 2026 may submit a YHDP renewal application that is consistent with project information included in the Grant Inventory Worksheet (GIW) and the expiring grant.
- **YHDP Replacement Project Application (CoC Board and Youth Action Board approval needed).** Any currently funded YHDP project that wishes to change the project type or recipient may submit a YHDP Replacement Project Application.

**The e-snaps information provided here is subject to change based on the final e-snaps applications once available.*

Part 2: Local Application Questions

All applicants are required to complete the Local Application Questions through the Survey Monkey platform. Local questions include questions addressing threshold criteria (i.e. eligibility to apply, certifications, and project quality criteria) as well as scored questions addressing the following:

- Project Capacity, Review and Ranking
- System Performance Measures
- CoC Coordination and Engagement
- HUD Priorities and Requirements

Note for New Applicants:

If you believe you are a good candidate for this funding opportunity, register in the appropriate systems now and review the application package. If you are already registered, make sure your registration is active and up-to-date.

- **SAM.gov Registration:**
 - You must have an active and up-to-date account with SAM.gov, at the time of application and throughout the life of any award.
 - To register, go to SAM.gov Entity Registration and click Get Started. From the same page, you can also click on the Entity Registration Checklist for the information you will need to register.
 - It can take several weeks to register in SAM.gov, so please get started now if you are planning to apply. SAM.gov also provides each organization with a unique entity identifier (UEI). A valid UEI is required to apply for funding.
- **e-snaps.hud.gov Registration:**
 - You must have an active esnaps.hud.gov account to submit your application. See step-by-step instructions on the [HUD Exchange](#).
 - See Section VI.B. Submission Methods

Contact Information

Close to Home/CoC: Katie Hubble katiehubble@closetohomesa.org

HUD: CoCNOFO@hud.gov

E-snaps: e-snaps@hud.gov

Appendix A: CoC Program Application Scoring Rubrics

New Project Scoring Rubric

Scoring Category	Scoring Element	Points
Esnaps Questions	Applicant Experience and Capacity	25%
	Project Description, Housing Services, and Program Participants	
	Partnerships and Collaboration	
	CoC Coordination and Engagement	
	Budget/Cost Effectiveness	
Performance Data	Applicant describes how the new project would improve each System Performance Measure (SPM)	50%
Local Application Questions <i>(examples offered here, but will need to ensure that NOFO requirements are accounted for)</i>	Supportive Service Participation Requirements	25%
	Add elements to respond to HUD Priorities, Merit Review, and Risk Review	
	Advances local priorities	
	Services and System Partnerships	
	PSH ONLY: Population Served	
	OUTREACH ONLY: Positive exits and partnering with law enforcement	
	Service connections for treatment	
Total Points Available		TBD

Renewal Project Scoring Rubric

Scoring Category	Scoring Element	Percent of Total Points
Esnaps Questions	Applicant Experience and Capacity	15%
	Project Description, Housing Services, and Program Participants	
	Partnerships and Collaboration	
	CoC Coordination and Engagement	
	Budget/Cost Effectiveness	
Performance Data	CoC Performance Scorecard	70%
Local Application Questions <i>(examples offered here, but will need to ensure that NOFO requirements are accounted for)</i>	Supportive Service Participation Requirements	15%
	Add elements to respond to HUD Priorities, Merit Review, and Risk Review	
	Advances local priorities	
	Services and System Partnerships	
	PSH ONLY: Population Served	
	OUTREACH ONLY: Positive exits and partnering with law enforcement	
	Service connections for treatment	
Total Points Available		TBD

Appendix B: CoC Program Performance Scorecards

****Coming soon**

Appendix C: CoC Grantee Oversight & Monitoring Policies and Procedures

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Introduction & Goals

Goal Statement

Close to Home as the Collaborative Applicant, supports CoC-funded grantees in accomplishing their outlined grant objectives. The objective is to maximize their impact on reducing homelessness, achieve desired outcomes in service delivery, improve rates of returns to homelessness, enhance collaboration within the homeless response system, and treat program participants with dignity and respect. The following outcomes are established for CoC grantees:

1. Actively participate in collaboration across the homeless response system.
2. Achieve designated program outcomes, including referral processes, assessment timelines, service delivery, and exits to permanent housing.
3. Include individuals with lived experience of homelessness in program development and decision-making.
4. Adhere to local policies and procedures, including CoC, ESG, and Local Written Standards, Homelink, CoC Governance Charter, and federal regulations to ensure appropriate use of grant funds.
5. Report accurate and comprehensive data at local and federal levels.
6. Successfully meet all contract requirements.
7. Appropriately and timely spend funds, avoiding recapture at the grant cycle's end.

Overview of Grantee Management & Responsibilities

This section will provide a general overview of the Grantee Management Procedures and outline general expectations. Section 2 of this document will list further information and details.

Onboarding for New Projects

The Local HUD Field Office holds an annual onboarding session with new grantees, but materials are available on HUD's website and should be reviewed to the grant start date. Discussions include standard CoC Program requirements, e-snaps issues and conditions, grant start date, eLOCCS and quarterly drawdowns, Sage, grant start-up plans, staffing capacity, and agency policies. The onboarding sessions are mandatory.

Close to Home's Technical Assistance Specialist conducts an onboarding session with new grantees before their anticipated grant date. This onboarding session includes a review of the following items:

- o Alliance Action Plan
- o Overview of the CoC Memorandum of Understanding (MOU), including annual or quarterly dues, attendance requirements to one Parent Committee and Alliance Advisory Board
- o Homeless Management Information System (HMIS) project setup
- o Homelink (San Antonio and Bexar County's local Coordinated Entry Model)
- o Required training and the Alliance Training Framework
- o CoC, ESG & Local Written Standards
- o Expectations for collaboration with people with lived expertise in homelessness
- o CoC Scorecard and performance monitoring
- o HUD reporting
- o The CoC governance structure
- o Agency Grievance Procedures/CoC Grievance Appeal Procedures
 - o Termination Process for CoC Funded Agencies

Site Visits

During the first year of a new grant, Close to Home offers intensive support to ensure that grantees can successfully manage their grant, understand the homeless response system, Coordinated Entry (Homelink), the grantee's role in the homeless response system, and successfully execute and meet objectives identified in the grant.

In subsequent years, Close to Home facilitates ongoing support for all grantees through bi-annual site visits. This provides additional support in ensuring grantees accomplish objectives identified in the grant agreements and navigate barriers and challenges as they arise.

During Fall Site Visits, Close to Home reviews the Notice of Funding Opportunity (NOFO) application findings, Independent Review Team (IRT) ranking, and IRT comments and addresses any deficits to improve performance and ranking. During the meeting, participants review and sign a Memorandum of Understanding for newly executed grants, assesses grant closeouts, creates spending plans for agencies, and discusses measurable agency goals for the following year.

During Spring Site Visits, Close to Home reviews grant outcomes, assesses spending, reviews project performance and compliance, develops strategies for improved compliance with the terms of the grant, including any new national initiatives, reminds agencies of Annual Performance Report (APR) deadlines in Sage, reviews CoC grievance appeals (if applicable), and monitors progress on agency goals.

Quarterly Risk Management Assessment

The CoC conducts quarterly assessments on funded projects, focusing on spending, performance outcomes, CoC Scorecard metrics, governance meeting attendance, and grievance appeals.

The Scheduled assessments will occur at 3, 6, 9, and 12 months of the grant cycle. Following each assessment, the CoC Technical Assistance Specialist will assign one of the following statuses: compliant, at-risk, or non-compliant.

If an agency is non-compliant, the CoC Technical Assistance Specialist and the Director of System Performance will schedule a check-in meeting to discuss plans to improve project performance.

If necessary, the CoC may recommend an agency be placed on a Quality Improvement Plan (QIP).

Feedback from Program Participants

Close to Home will conduct interactive focus groups with program participants through the Pathways to Progress initiative. The focus groups may be hosted in an individual or group setting to allow for survey questions to be implemented. Stipends for program participants may occur.

Additionally, all program participants are offered the opportunity to collaborate with Close to Home's Lived Experience Advisory Board (LEAB) and Youth Advisory Board (YAB).

Because of the importance of ensuring that people who have had the experiences that the homeless response system is meant to address, CoC grantees are strongly urged to utilize and elevate these voices in their project implementation, operations, and process improvement.

Notice of Financial Opportunity (NOFO) Ranking

Annually or Bi-Annually, HUD hosts the annual Notice of Funding Opportunity (NOFO) Competition, which allows CoC's to apply on behalf of their community for federal funding that supplies funding for projects that address homelessness and provide unhoused individuals resources varying from supportive services to permanent supportive housing. Close to Home also utilizes the NOFO ranking process to determine reallocation strategies, as applicable.

During this competition, new project and renewal applications are ranked through a community Independent Review Team (IRT) based on application submission, with criteria approved by the CoC Board of Directors. Close to Home submits an application with the final CoC Board of Director's ranking to HUD. HUD finalizes this process by

approving and/or denying projects for funding, which include newly funded projects and newly funded CoC Grantee Agencies. This process requires intensive onboarding based on the project type, Agency (and if they have or have not been CoC Funded prior), along with new staff that are hired for each project.

The Communications and Development Team informs the Technical Assistance Specialist of all awarded projects within 5 days of receiving award information, which includes newly funded Agencies and Projects. The Technical Assistance Specialist then emails all awarded projects within 7 days with a briefing on the next steps for implementing their newly awarded projects.

The Technical Assistance Specialist reviews the NOFO application with IRT feedback during Fall Site Visits to gather information on needed improvements and ways the CoC can further support agencies, along with identifying areas of strength. If necessary or if recommended by the IRT the CoC will work with the agency and develop a QIP to address deficits.

CoC Grievance Appeals

The CoC has established a CoC Grievance Appeals process that acts as further support for CoC-Funded Agency Program Participants who wish to appeal a grievance based on the established outcome from a previously submitted Agency-level Grievance. This appeal process takes place within the Homeless Strategic Plan Advisory Board meetings.

Data and Reporting

Close to Home utilizes local and national System Performance Measures (SPMs) to compare project-specific outcomes against community-wide (homeless response system) metrics and develop corresponding strategies and training with the HMIS team.

Recipients with HUD funding received through CoC Program homeless assistance grants are required to submit an Annual Performance Report (APR) electronically to HUD every operating year. Data collection for the APR is aligned with the most recent version of the Homeless Management Information System (HMIS) Data Standards.

All CoC-funded agencies are required to abide by HMIS data policies, including required data. These data elements will be reviewed and flagged during the quarterly risk management assessments, if found to be non-compliant. Any data quality concerns will be addressed via Site Visits between Close to Home and HMIS which are conducted twice per year.

In addition, agencies are required to submit Point-in-Time and Housing Inventory Count data to assess bed utilization on an annual basis.

The CoC has created performance monitoring tools to ensure the success of the Homeless Response System. As part of these monitoring tools, agencies will be provided with information on how they are performing at both a system and individual level. If compliance findings occur that hinder performance, agencies may be placed on Quality Improvement Plan (QIP) based on the findings.

In total, CoC Grantees are expected to complete the following reports to maintain data compliance:

- o System Level Reporting:
 - o System Performance Measure Reporting (SPMs)
 - o Point in Time Count Reporting (PIT)
 - o Housing Inventory Count Reporting (HIC)
- o Project Level Reporting:
 - o Annual Performance Reports (APRs)
 - o Performance Monitoring

Grantee Training

All grantee onboarding and administration training is provided through our Alliance Training Portal. The Grantee Management Pathway course is disbursed to all CoC-funded agencies to be completed within the provided time frame based on the trainings included. The trainings will be tracked for completion as part of the quarterly risk management assessment. Trainings needed will be discussed and evaluated during Site Visits and Onboarding.

Quarterly Meetings with the Local Field Office

Close to Home and the HUD Local Field Office coordinate quarterly meetings to ensure the success of all funded projects. CoC-funded agencies may be invited to the quarterly meetings if they have concerns or questions that the Local Field Office needs to address.

Homeless Strategic Plan Advisory Board

The Director of System Performance attends monthly meetings with representatives from COSA, Bexar County, United Way, and TDHCA to ensure collaboration and alignment among funders on decisions, performance monitoring, and priorities.

CoC Grant Management & Life Cycle

The Grant Life Cycle

NOFO Ranking and Competition Process

The CoC Program is designed to promote communitywide commitment to the goal of ending homelessness by providing funding for efforts by nonprofit providers and state and local governments and promoting access to and effect utilization of mainstream programs by homeless individuals and families.

Annually or Bi-Annually, HUD issues their Notice of Funding Opportunity (NOFO) for Continuum of Care funds through a local and national competition. Close to Home, as the Collaborative Applicant, can apply on behalf of our community (San Antonio and Bexar County) for this Federal Funding.

Agencies can submit project applications during this NOFO competition period to Close to Home, the two types of applications include Renewal Projects (which is considered any project that is currently active) or New Projects (projects that are currently nonexistent). Each of these applications is required to include varying documents to ensure a proper submission, these documents include the following:

Renewal Projects:

- o eSNAPS application
- o eSNAPS application (questions 3,4,5,6)
- o Local Application Narratives
- o Agency Policies and Procedures
- o Scorecard for renewing project (analysis must be done for current grant cycle)
- o Scorecard Justification (if applicable)

New Projects:

- o eSNAPS application
- o eSNAPS application (questions 3,4,5,6)
- o Audited Financial Statements
- o Local Application Narratives

Each of the applications submitted are then reviewed by a locally formed Independent Review Team (IRT). This team can consist of any members of the local Homeless Response System and range from 3-5 members. These individuals analyze submitted applications against an IRT scoring rubric which measures applications based on the following criteria:

- o Section One: Applicant Experience and Capacity
- o Section Two: Project Description, Housing Services, and Program Participants
- o Section Three: Local TX-500 Application

Each of these sections is broken down into further questions that must be addressed within the Agency's Project Application. Each question is worth a certain number of points and is added together at the end of each section to total a score. This score is then averaged out across the number of IRT members to provide a total final score. Projects are then ranked into two different tiers based on their final scoring out of 150 total points. The higher the score, the higher the project is ranked competitively within the community and the greater likelihood that HUD will approve the project for Federal Funding (although this is not always the case).

Once applications are ranked, they are formally approved by the CoC Board of Directors for submission to HUD. Close to Home then submits the finalized consolidated application through eSNAPS to HUD.

HUD announces NOFO awards typically within 2-6 months. Once notified, Close to Home will review which local projects were approved for renewal along with which proposed new projects were awarded CoC Funding. It is critical to begin the gradual onboarding process with newly funded CoC Grantees to ensure they are set up for success prior to their project start date.

Once notified of CoC Awards, the Director of Communications & Development notifies the Technical Assistance Specialist of all awarded projects during this NOFO competition.

Onboarding New CoC Funded Agencies and Projects

Overview

Purpose of the CoC Program

The Continuum of Care Program is designed to promote communitywide commitment to the goal of ending homelessness by providing funding for efforts by nonprofit providers and State and local governments and promoting access to and effect utilization of mainstream programs by homeless individuals and families.

Onboarding Process Objectives

A gradual onboarding process is provided to newly funded CoC grantees, shortly after the CoC Award announcement. This gradual process is intended to provide grantees with information and training to slowly acclimate them to their new funding and assist

with understanding their roles within the CoC. This will include the following in-person onboarding materials:

- o A review of the CoC MOU
- o Review of the Local Written Standards
- o Review of the Interim Rule
- o HUD Exchange
- o Resources catered to their project's specified funding source (YHDP, DV Bonus, SNOFO)

This onboarding method is intended to ensure that newly Funded CoC Grantees are in alignment with Close to Home regarding expectations for their project performance, Federal Requirements and Local requirements with the ability to identify areas for further Technical Assistance.

New Agency/Project Onboarding Lead

Close to Home's Technical Assistance Specialist facilitates the onboarding of CoC, SNOFO, and YHDP-funded projects once HUD shares final awards through coordination with the Director of Communications and Development.

Expected Outcomes of New Agency/Project Onboarding

The onboarding process prepares grantees for effective grant management. It ensures projects comply with the HUD CoC Interim Rule and prepares grantees for the grant monitoring process. Grantees receive necessary trainings to navigate their grant lifecycle and understand their roles within the Homelessness Response System, including connections to funding, the HMIS system, and Homelink.

New Agency/Project Preparation After Award Announcement

1. The Director of Communications and Development notifies the Director of System Performance and the Technical Assistance Specialist once a new project is awarded funding. The System Performance Department also refers to the Texas Funding HUD Report and Award Allocations within 5 business days.
2. The Technical Assistance Specialist sends a welcome email with an onboarding timeline within one week of being notified of the new agency/project funding within 7 business days.
3. Within one week of the welcome email, the Technical Assistance Specialist schedules a CoC Orientation meeting, which covers basic information about Homelink and provides an overview of the onboarding process.

- o A tracking sheet is created for the partner to maintain an internal record of dates and documentation. This is shared through email for grantees to maintain the documentation.
- o Onboarding Check-In Agenda Worksheets and Materials are prepared, and will include the following:
 - i. Adding supporting materials and documentation to the calendar invite.
 - ii. Setting up all necessary training dates, including:
 - o HomeLink Orientation (Skilled Assessors training)
 - o Scorecard training/Performance Monitoring Tools training
 - o Monthly Drawdown Report Training (Draw Down Worksheets)
 - o HUD CoC Checklist & Policy and Procedures Review
 - o APR training/Sage Training
- 4. Prior to the CoC Orientation, the following actions are taken:
 - o An invitation or "Save the Date" communication is sent to the partner/project.
 - o Access to the Alliance Training Portal
 - o Deadlines are provided for the partner to submit any pending documentation prior to the first onboarding meeting.
 - o Firm onboarding check-ins are scheduled bi-weekly or monthly for two to four months prior to the grant start. This can change based on Close to Home's analysis of the grantee's performance or based on the partner's availability.
 - o These dates are added to the Technical Assistance Specialist's calendar as placeholders before inviting the partner and include relevant Close to Home staff.

The CoC Orientation Meeting is held at least 90 days before the anticipated project start date. The following preparations are made:

- o Identify and document the Primary and Secondary Points of Contact (POC) for sending necessary documents to Close to Home.
- o All POCs are added to the Close to Home Distribution List and POC Directory.
- o A visual timeline is created for the partner. Review internal documents to identify any outstanding documentation required from the Agency (e.g., Executed Grant Agreement, MOU, Policies, and Procedures).
- o Pre-fill the Onboarding Checklist Worksheet Template with relevant information and gather necessary documents, including:
 - o Executed Grant Agreement
 - o CoC Funded Project Details (Grant Number, Project Name, Award Amount, Start Date, End Date, Target, Funding Source, Project Type, Population, Location, Special Population, Primary POC, Secondary POC, reopen dates, eligibility criteria)

- o Memorandum of Understanding Review (update MOU if a new fiscal year has begun)
- o Project component scorecards for review
- o Resources tailored to the project type and funding source.
- o All items will be added to the dedicated folder on the server for storing all documents related to each partner agency, including Grant Agreements, MOUs, and Monthly Drawdowns within 5 business days of items received.

Staffing/Capacity Planning: Collaborate with partners to assess staffing needs for grant fulfillment. This plan should include the number of staff required, the anticipated start date, and when the new project will operate at full capacity.

Connecting Project with HMIS: The Technical Assistance Specialist collects the necessary information for project setup in HMIS, ensuring completion no later than four weeks prior to the anticipated project start date. Required documentation includes:

- o Executed Grant Agreement
- o CoC Funded Project Details
- o Memorandum of Understanding Review (Close to Home and Grantee; Homelink and Grantee).

After documentation has been gathered, the Technical Assistance Specialist will schedule a meeting with the Data and Performance Analyst to assess the agency's eligibility for HMIS access. Agencies seeking HMIS access must also be a member of the Alliance to House Everyone. If the agency qualifies, the Analyst will coordinate a Pre-Project Set-Up meeting.

- o The Data and Performance Analyst will handle administrative tasks (e.g., calendar invites, agenda) while the Technical Assistance Specialist takes notes.
- o If the meeting is successful, the partner will be instructed to complete the CHO and submit the New Project Set-Up form on the HMIS website.
- o A meeting will be set up with HMIS and the Technical Assistance Specialist to support submitting the New Project Set-Up form and ask any pertinent questions.

New Agency/Partner Training: Training is completed at least four weeks prior to the project start date, covering:

- o Scorecard Overview
- o CoC Start-Up Training Webinar
- o CoC Program Interim Rule and Recipient Post Award Guide
- o APR Guidance and Access
- o Overview of the CoC Coordinated Entry System

- o Grantee Starter Kit overview (including Grantee Management, HMIS Role, and Homeless Response System)
- o HUD Exchange registration
- o Overview of Alliance Advisory Board /Committees (overview of required CoC Governance Structure participation)
- o HUD Grantee/Budget Training.

Additional training is completed thirty days prior to the project start date, including:

- o HMIS User Training
- o Homelink Orientation

Establish New Grantee Support Plan: The Technical Assistance Specialist creates a calendar with the onboarding schedule and sends this out to new grantee POCs.

- o During the first 90 days of the new grant cycle, the Technical Assistance Specialist coordinates weekly check-ins to facilitate access to various platforms (HMIS, SAGE, eLOCCS), required trainings, and drawdown management, etc.
- o After the 90 days are completed, the meetings are transitioned to bi-weekly check-ins until the grant cycle has hit 6 months.
- o Meetings transition to monthly check-ins until month 9 of the grant cycle.

New Agency/Project Preparation After Project Start Date

One Week After Project Start Date

The Technical Assistance Specialist ensures all documentation is uploaded to the server, including:

- o New MOU between Close to Home and the Grantee.
- o New MOU between the Grantee and Homelink.
- o Executed Grant Agreement.
- o Onboarding Checklist Agenda Worksheet.

The Director of System Performance confirms that all documentation has been uploaded to the server prior to the new grant start date.

One to Three Months after Project Start Date

1. The Technical Assistance Specialist maintains weekly meetings for the first 90 days based on the agency's CoC funding history, project type, and funding source.
2. The goal is to address barriers and challenges during these weekly or monthly check-ins dependent on grantee preferences.

3. The Technical Assistance Specialist continuously reassess any additional training needs, such as referrals, scorecards, spending plans, staff plans, etc.
4. Notes are documented after every meeting within the Technical Assistance's Asana Task on the Grantee Management and Monitoring Board.
5. Include the new project partner in the agenda for check-ins with the Local HUD office and Close to Home. The partner is not required to attend unless issues need to be escalated to the HUD local office due to slow spending or regulatory compliance issues.
6. Review onboarding processes for new staff as necessary.

Onboarding Process for new staff is listed below but is dependent on what is applicable based on the individual's position within the agency:

- o Within 2-4 Weeks after Hiring Date:
 - o HMIS and Homelink Orientation
- o Within First Month after Hiring Date:
 - o CoC Start-up training webinar
 - o Overview of the CoC CE System
 - o CoC Governance Overview
 - o HUD Exchange Training
- o Within 4-8 Weeks after Hiring Date:
 - o APR and Sage Training
 - o Draw Down Worksheets Training

Three to Six Months after Project Start Date

1. Meetings may shift to a bi-weekly schedule based on the grantee's needs.
2. Continue addressing barriers and challenges in meetings.
3. Reassess for additional training needs as required.
4. Maintain notes after every meeting in the Technical Assistance Specialist's Asana task on the Grantee Management and Monitoring Board.
5. Review the scorecard to identify and resolve any technical or data entry errors, ensuring the grantee is generating reports monthly.
6. Revisit APR access to ensure the grantee understands how to generate reports.
7. Depending on the grantee's progress, meetings can become monthly unless additional guidance is necessary.

Six to Nine Months After Project Start Date

1. Meetings may continue every month, unless the grantee needs further guidance. If this is the case, the Technical Assistance Specialist will coordinate with the

Grantee, and the Director of System Performance to review the needed frequency of continued meetings (weekly, biweekly).

2. Reassess APR access to confirm that the grantee has assigned a POC in SAGE and has reviewed all relevant guides and resources.

Grant Expansions

During the Notice of Funding Opportunity (NOFO) Competition which occurs every two years, project applicants have the option to expand existing eligible renewal projects by submitting an additional new project application for funds for new eligible activities. An expansion project combines an existing eligible renewal project with up to two new projects that request funding to expand the existing project.

If all the projects meet eligibility and quality threshold requirements and are selected for conditional award, then during the post-award process, the HUD field office will combine the funding in one grant.

The new project would expand the current operations of an existing renewal project by adding units, beds, persons served, or services provided to existing program participants, or by adding additional activities to HMIS and SSO-Coordinated Entry projects.

Grant Reallocations

If a CoC Program grantee no longer wants to operate the grant and is not able to wait until the NOFO competition to reallocate, they must first receive permission from the CoC Board of Directors and ultimately, HUD, to voluntarily deobligate their grant outside of the NOFO process or before the grant agreement expires. It is strongly recommended that grantees who wish to deobligate wait until the next funding cycle and thus, requests are only granted when there are extenuating circumstances. Deobligation may impact an organization's ability to receive funding in the future.

The following criteria must be met in order to deobligate:

- o The expected date of the deobligation is at least 6 months after the request; and
- o The grantee receives approval from the CoC Board Executive Committee after a formal meeting;

Once approved to deobligate, Close to Home will host a grant competition for the funding, which will be open to current grantees as well as the broader community. Applicants will be evaluated on their experience managing a grant of the same or greater dollar amount, experience operating a similar project, staff capacity to meet the needs of current project consumers, and ability to provide the required match.

The funding competition process will follow the policies outlined in this document. Once an agency has been recommended by an independent review team and approved by the CoC Board, a formal recommendation shall be submitted to HUD for the grant transfer. The following letters are required by HUD:

- o A letter from the deobligating agency's CEO indicating that they approve the recommendation; and
- o A letter from the CoC Board President justifying the deobligation and recommended agency; and
- o A letter from the receiving agency indicating their willingness and ability to take over the grant.
- o Throughout the grant transfer timeline, the reallocating agency is expected to continue operating at full capacity unless extenuating circumstances deem they are unable and must transfer program participants to a new project. They are also expected to:
 - o Respond readily to communications from the CoC Lead Agency; and
 - o Prepare a grant transfer action plan for CoC Board approval, with special emphasis on a consumer outreach plan; and
 - o Collect signatures from all consumers indicating they have been notified of the reallocation and actively participate in a six-month transfer process.

To ensure minimal disruption of services for project consumers, the receiving agency is closely monitored for the first six months of operation. This monitoring includes, but is not limited to, monthly site visits by CoC staff.

CoC Project Funding Sources

Overview

Objective of Specified Funding Sources

CoC Federal Funding is divided into multiple categories with various funding sources, the objective of this is to ensure that funding targeted to a specific population is utilized for its intended source. These differing funding streams can include, but are not limited to:

- o **Youth Homeless Demonstration Program (YHDP)** funding which is targeted at youth ages 18-24 years old.
- o **Domestic Violence Bonus (DV Bonus)** funding which is targeted to individuals in HUD's Category 4 of homelessness and are actively fleeing Domestic Violence.
- o **Special Notice of Funding Opportunity (SNOFO)** also known as the Unsheltered Set Aside funding which is targeted at individuals who are either currently or previously classified as experiencing unsheltered homelessness.

- o **Housing Opportunities for Persons with AIDS (HOPWA)** funding is targeted at individuals who have HIV/AIDS.
- o **Permanent Supportive Housing (PSH)** Dedicated funding can only be used to serve chronically homeless individuals.

These different funding sources are targeted at assisting individuals as outlined above, and should only be used to provide services to individuals who meet the outlined criteria requirements of their specified funding source. CoC Projects may have additional requirements, outlined by the project type being Permanent Supportive Housing (PSH), Transitional Housing (TH), Rapid Rehousing (RRH), or Supportive Services Only (SSO) along with the differentiation of serving individuals or families, as outlined in their grant application.

Grant Closeouts

Overview

Objective of Grant Closeout Planning

CoC Grantees may relinquish their CoC Funding at any point within their period of performance date or notify Close to Home of their agency's decision not to renew their federal funding during the NOFO competition. If a grant is currently active when relinquished it is critical that planning has taken place for program participants to maintain their housing security and supportive services to ensure they do not fall back into homelessness.

Relinquished Funding During Active Grants

If an agency relinquishes their CoC Funds during their active grant cycle, a grant reallocation process will be required to take place, also known as a grant transfer. To ensure this funding stays within our community, Close to Home's Technical Assistance Specialist and Director of System Performance will be required to send local CoC providers a notification of the funds available. This notification should include the following:

- o Project Type (PSH, RRH, TH or SSO)
- o Funding Source (CoC, DV Bonus, YHDP, HOPWA, PSH Dedicated)
- o Required Start Date
- o Program Participant Eligibility
- o Unit and Bed Composition
- o Grant and Renewal Information

This notification of funding availability will require the following from potential agency applicants:

Eligibility Criteria:

1. The agency must be a current CoC, YHDP, or Special CoC grantee.
2. The agency must have no unresolved findings or monitoring from HUD.
3. The agency must agree to follow federal regulations and ESG, CoC, and Local Written Standards (including HMIS, Homelink, etc.) and sign an MOU with Close to Home.

Requirements:

Submit a letter on an agency letterhead stating interest in receiving this grant transfer and an acknowledgment of the eligibility requirements.

If only one agency is to apply for this funding within the time frame provided, and are eligible based on the above-mentioned criteria, they will be awarded the grant. If multiple agencies apply for this funding, so long as they are eligible based on the above criteria, Close to Home will be required to hold an official competition process as outlined by NOFO requirements.

This will require Close to Home to gather members of the community to serve as an Independent Review Team (IRT) to review the outlined applications based on the following criteria:

- o Experience managing a grant of the same or greater dollar amount along with managing federal grants
- o Experience operating an RRH or similar project
- o Staff capacity to meet the needs of current project consumers
- o Ability to provide the required match
- o Participating in Coordinated Entry

Once the IRT is able to finalize their scores for each agency's application, an average score will be gathered from the IRT for a final score for each application. Once final scores are reviewed, the highest scoring application will be awarded this grant transfer.

If clients are currently enrolled into the project being transferred, they will be transferred to the agency with the newly awarded funding to maintain their housing placements and supportive services.

Performance Monitoring & Compliance

Bi-Annual Site Visits

Overview

Objectives of Bi Annual Site Visits

Bi-annual Site Visits aim to assess each grantee's current functional capabilities and readiness for project implementation, identify areas for improvement, and support continuous improvement through specific goals and actions outlined in a Quality Improvement Plan (QIP). The visits also help identify areas where technical assistance may be beneficial. Site Visits are conducted for all CoC Funded Agencies, regardless of performance outcomes.

New Agency/Project Onboarding Close to Home Lead

Close to Home's Technical Assistance Specialist facilitates Bi-Annual Site Visits for CoC, SNOFO, and YHDP-funded projects. Visits occur two times per calendar year, ensuring regular engagement and support.

Expected Outcomes of New Agency/Project Onboarding

1. Provide support and guidance for compliance with the HUD CoC Interim Rule and assist grantees in preparing for potential HUD monitoring.
2. Ensure adherence to local policies, procedures, and written standards.
3. Assist in the preparation for the CoC Program NOFO Competition.
4. Verify that Close to Home's CoC Memorandums of Understanding (MOUs) are up to date and that grantees are meeting MOU requirements.
5. Gather input and feedback from grantees to enhance program support.
6. Establish Quality Improvement Plans based on assessment findings.

Bi Annual CoC Site Visit Preparation

One Month Prior to Meeting

The Technical Assistance Specialist will set up the Bi-Annual Site Visit Tracking Sheet with assigned dates and times for the entire calendar year, noting that site visits will occur in both Spring and Fall.

Prepare Documentation

The Technical Assistance Specialist will review internal documents to determine which Agency client documents are pending submission (e.g., Grant Agreement, MOU, Amendments, Monthly Drawdowns).

Pre-fill the Bi-Annual Site Visit Agenda Worksheet Template and gather essential materials/documents:

- o Project details (Grant Number, Project Name, etc.)
- o eLOCCS information (monthly drawdown reports)
- o Program Participant Record Keeping (HMIS numbers for review)
- o Memorandum of Understanding Review (review and pre-fill new MOU if a new fiscal year has started)
- o HUD Reports (PIT, HIC, APR) and due dates
- o System Coordination/Homelink referral outcomes
- o Evaluate Project Performance (using CoC Scorecard Reports, Monthly Summary Reports, and future micro-report performance monitoring tools)
- o Compile resources to address identified project barriers
- o Organize all documentation for each partner agency in a designated folder on the server (including Grant Agreement, MOU, Amendments, Monthly Drawdowns, Agency Policies and Procedures, etc.).

Schedule the Site Visit:

- o The Technical Assistance Specialist will send a calendar invite to the partner six weeks in advance to the site visit.
- o The Technical Assistance Specialist will email the grantee to specify deadlines for the partner to provide any pending documentation before the site visit.
- o The Technical Assistance Specialist will update the tracking sheet to note confirmations or adjustments to visit dates and times.

Finalize the Site Visit Agenda and Materials:

- o The Technical Assistance Specialist will add relevant materials to the calendar invite four weeks before the meeting.

Two Weeks Prior to Meeting

Review Document Preparation

- o The Technical Assistance Specialist will confirm that all requested documentation has been received. They will then send a reminder email to the partner, if necessary.
- o Re-check Performance Scorecards to see if there have been any recent updates.

Two Days Prior to Meeting

Finalize Document Preparation:

- o The Technical Assistance Specialist prints and digitally prepares the Site Visit Agenda Worksheet, ensuring it is ready for a physical or digital signature.
- o The Technical Assistance Specialist sends a final reminder email to the partner to ensure they are prepared for the arrival of Close to Home Staff.
- o Lastly, The Technical Assistance Specialist confirms directions, parking access, and entrance information for the site location.

Site Visit Meeting Format

All Site Visits will be held at a location decided by the specified CoC Grantee Agency. Grantees will be notified of Site Visit availability 8 weeks prior to the scheduled month for Site Visits via email notifications and a Survey Monkey link to detail dates available, location of the visit, and who all should be included in the calendar invite. Each Site Visit will require a four-hour block to ensure that there is sufficient time to review the agenda and answer questions from Grantees.

Spring Site Visits:

- o **Organizational Policy Review:** Grantees will be notified to provide Close to Home excerpts of their organizational Policy and Procedures to ensure standardization and alignment with CoC, ESG, and Local Written Standards as well as mandated HUD Federal Regulations. Examples of these policies can include but are not limited to the following:
 - o Emergency Transfer Plan
 - o Lived Expertise Incorporation
 - o Termination Policy
 - o Grievance Policy
 - o Appeals Policy
 - o Fair Housing and Equal Access

Agencies will be required to submit their organizational policies 4 weeks prior to the visit for Close to Home staff to review. Close to Home staff will then discuss their findings and debrief over the agency's areas of improvement and notable successes in different metrics at the Site Visit.

- o **Grant Spending:** Close to Home staff reviews all agency quarterly spending reports via the Close to Home Draw Downs Worksheet prior to the Site Visit to identify areas of discussion if spending is a concern. If there is a concern with spending, Close to Home will detail the amounts needed to spend in order to avoid recaptured funds at grant cycle completion and work with the agency to create a spending plan if needed.

Fall Site Visits:

- o NOFO Debrief: Close to Home provides agencies with an overview of how their projects were scored throughout the NOFO Competition. This will include project ranking, average scoring from the IRT, feedback from the IRT, where points were earned and where points were lost. Close to Home staff compiles all documents submitted during the NOFO (eSNAPS application, local application, Scorecard, Scorecard Justifications, Policies and Procedures) into a zip file, along with the IRT rubrics, to provide the grantee with the full scope of their ranking in the competition.
- o Grant Spending: Close to Home staff review all agency quarterly spending reports via the Close to Home Draw Downs Worksheet prior to the Site Visit to identify areas of discussion if spending is a concern. If there is a concern with spending, Close to Home will detail the amounts needed to spend to avoid recaptured funds at grant cycle completion and work with the agency to create a spending plan if needed. If Close to Home has identified significant recaptured funds in a grant cycle, or continued issues with grant spending, a Quality Improvement Plan may be put into place to ensure proper spending and monitoring.
- o Planning for the following year: Close to Home will discuss with each agency where they feel support is needed, whether it be technical assistance or trainings. Close to Home Staff and the Grantee will then discuss planning for the following year, along with measurable agency goals that will have a follow up at the following Spring Site Visit.

All CoC Site Visits will request reporting of agency level grievances for all CoC Funded projects, along with supporting documentation and outcomes of grievances.

Post Site Visit

Within Seven Business Days of the Meeting

Document Management:

- o The Technical Assistance Specialist uploads all meeting documentation to the server, including any new or amended MOU, QIP, Grant Agreement, and the signed Site Visit Agenda Worksheet.

Prepare a Detailed Summary Report:

- o Within seven business days, the Technical Assistance Specialist sends a summary report to the partner and saves a copy on the server. The report will include:

- o Strengths observed
- o Areas requiring attention
- o Recommendations for improvement

Communication of Grantee Progress:

The Technical Assistance Specialist reports any finding that may hinder the grantee completing their required contract obligations to include spending concerns, individuals being served, etc. to the Director of System Performance within 5 business days of site visit completion.

The Director of System Performance reports these findings to the Senior Director of Advancement to create a plan to inform the Homeless Strategic Planning Advisory Board, if applicable.

CoC Grant Monitoring Spreadsheet

Overview

Objective of CoC Grant Monitoring Spreadsheet

Close to Home has developed the CoC Grant Monitoring Spreadsheet to effectively organize and monitor CoC Grantee Spending across all projects. This Spreadsheet is intended to utilize grant spending reports and monitor the time elapsed in project grant cycles to ensure spending is facilitated within the designated period of performance. With this process, spending deficiencies can be caught earlier in the grant life cycle and allow for spending plans to be developed, ensuring the probability of recaptured funds is decreased.

Spreadsheet Updating Requirements

To ensure spending is tracked efficiently with the most up to date information, the Technical Assistance Specialist will be required to update the spreadsheet at a minimum monthly, through utilization of Draw Down Worksheets and Sage's Performance Spotlight for each CoC Funded Project.

Utilization of the CoC Grant Monitoring Spreadsheet

To facilitate proper monitoring, the Technical Assistance Specialist is to utilize this Grant Monitoring Spreadsheet during one-on-one meetings with the Director of System Performance and raise any concerns based on specified project spending. If a spending deficiency of 10% or greater is found, the following must occur:

The Technical Assistance Specialist must schedule a meeting with the Grantee to discuss the spending deficiency. This meeting will be intended to decipher the

reasoning for underspent funds and find areas for further technical support for the Grantee.

The Technical Assistance Specialist will notify the Director of System Performance of the spending barriers the Grantee is facing and strategize next steps for further support and monitoring.

If the spending deficits continue, further information for next steps can be found in the Quality Improvement Plan section of this document.

Quality Improvement Plans

The purpose of the Quality Improvement Plan (QIP) Policy is to establish a consistent and transparent process for addressing concerns with grant management and performance among CoC-funded projects. The QIP process is a supportive tool to guide grantees toward corrective action and improved alignment with CoC standards, HUD requirements, and best practices.

Policy

The CoC Board of Directors, in partnership with the CoC Lead Agency (Close to Home), may initiate a Quality Improvement Plan (QIP) for any CoC-funded project that demonstrates ongoing or significant deficiencies in grant management, compliance, or performance. The QIP process is designed to:

- o Protect the integrity and effectiveness of the CoC system.
- o Provide technical assistance and clear expectations for improvement.
- o Encourage accountability, transparency, and continuous improvement.

Grounds for Issuance of a QIP

A QIP may be issued under the following circumstances:

Grant Management Issues:

- o Repeated underspending or overspending of grant funds
- o Failure to draw down funds in a timely manner
- o Missing or late HUD-required reporting (e.g., APR, eLOCCS, QPR)
- o Failure to meet match or leverage requirements
- o Non-compliance with grant agreements or HUD regulations

Program Performance Concerns

- o Persistent low housing placement or retention rates
- o Low referral success rates from Coordinated Entry

- o Consistent data quality issues in HMIS
- o High rates of unresolved client grievances or complaints

Governance or Collaboration Concerns

- o Lack of participation in CoC governance or required committees
- o Poor collaboration with CoC partners or local service systems
- o Non-responsiveness to CoC Lead or Board communication

Criteria for Immediate QIP Issuance

A QIP may be issued immediately—without prior informal warnings—if any of the following occur:

- o Misuse or mismanagement of federal funds
- o Falsification of program data or performance reporting
- o Violation of civil rights or fair housing laws
- o Confirmed retaliation against clients, whistleblowers, or other providers
- o Repeated or egregious violations of Coordinated Entry policies
- o Findings of fraud, waste, or abuse by HUD or another oversight body

QIP Process and Escalation Levels

Level 1: Informal Notification & TA Support

- o Triggered by minor or first-time issues.
- o CoC Lead meets with the grantee to discuss concerns and offers TA or peer learning.
- o No formal QIP issued; documented internally.

Level 2: Formal QIP Issuance

- o Triggered by recurring issues or lack of improvement.
- o CoC Board of Directors reviews documentation and votes to issue a QIP.
- o Grantee receives written notice detailing:
 - o Areas of concern
 - o Required corrective actions
 - o Timeline for resolution (typically 60–90 days)
- o CoC Lead technical assistance plan
 - o Regular check-ins scheduled with grantee, meeting at a minimum monthly.

Level 3: Enhanced Monitoring

Triggered if QIP corrective actions are not completed on time or issues worsen.

May include:

- o Monthly progress reports
- o On-site or virtual monitoring visits
- o Escalation to HUD (if applicable)
 - o Grantee may be asked to submit a performance improvement work plan.

Level 4: Recommendation for Reallocation or Removal

Triggered by sustained non-compliance or failure to improve after QIP period.

CoC Board of Directors may:

- o Vote to reallocate the project in the next NOFO cycle
- o Suspend CoC membership or access to system-level benefits (e.g., Coordinated Entry)
- o Notify HUD of non-compliance

Grantee Rights and Appeals

- o Grantees may request a meeting with the CoC Board or QIP Review Panel to provide additional context or clarification.
- o Grantees may submit a written response or corrective plan for Board consideration within 15 business days of QIP issuance.
- o Appeals of Level 3 or Level 4 actions must be submitted in writing and will be reviewed by a neutral committee of CoC members not affiliated with the grantee.

Documentation and Transparency

All QIPs, meeting notes, and follow-up reports are documented by the CoC TA and maintained in the grantee's compliance file.

- o A summary of QIP activity is shared with the CoC Board.

CoC Dues

Overview

Objective of CoC Dues

Through the CoC MOU, CoC Grantees are required to account for dues to the CoC. CoC Dues are required for all CoC Grantees, regardless of organizational type (including government and housing authorities). CoC Dues are charged at a rate of 1.75% of each CoC Project Grant and must be paid within 90 days of final Grant Agreement execution or at a quarterly rate dependent on the decision by the CoC

Funded Agency. It is important to note that HUD CoC Funds cannot be used to pay these costs.

CoC Dues are utilized to ensure Close to Home can administratively continue up to date monitoring, reporting, performance management, along with coordinated entry needs, technical assistance, and coordination that comes with new projects and expanded funding each year.

CoC Grantees are required to coordinate with Close to Home's Chief Financial Officer to ensure these dues are submitted in a timely manner to Close to Home. CoC Dues must be up to date in order for a currently CoC funded agency to apply for new project funding.

Delinquent Dues

CoC Agencies found to have developed delinquencies in dues can be defined by the following:

- a. CoC Agencies who have decided to pay dues on an annual basis, with dues reaching a six-month late period.
- b. CoC Agencies who have decided to pay dues on a quarterly basis, with dues reaching a 90-day late period.

If a CoC Funded Agency is found to have developed delinquent dues, the CoC Board of Directors and the Homeless Strategic Planning Advisory Board will be notified to determine next steps and determine if there are broader cash flow or spending concerns with the agency.

Annual Performance Reports (APR) & Quarterly Performance Reports (QPR)

Overview

Objective of APR/QPR Requirements

HUD Requires CoC Recipients to submit Annual Performance Reports (APR) within 90 days from the end of their grant operating year. Special NOFO Recipients are required to submit both Quarterly Performance Reports (QPR) and an APR. These reports are used to measure the number of persons served in CoC programs and to document the performance outcomes achieved from various project types. The CoC ensures proper communication is maintained between CoC Grant Recipients to be aware of their APR and QPR submission due dates to maintain reporting requirements to HUD.

Annual Review of SAGE

Close to Home’s Technical Assistance Specialist reviews SAGE at the beginning of each calendar year and notates dates for QPR and APR Submissions within their individual calendar. Dates will be listed as follows:

Two months prior to a QPR/APR due date, the invite will be listed as “Upcoming APR Due Date” that will notate each grant submission needed and their listed due date in Sage.

- o Following this calendar reminder, the Technical Assistance Specialist emails the Grantee and notifies them of the project names, grant ID numbers and due dates for the APR/QPR submission.

The month of the due date for QPR/APR submission, listed as “APR Due Date this month” will notate each grant submission needed and their listed due date in Sage.

- o At the start of the month of the due date for the QPR/APR Submission, the Technical Assistance Specialist sends out a reminder email to the grantee, along with the project names, Grant ID numbers and due dates for the APR/QPR submission.

One Week Prior to QPR/APR due date, listed as “APR Due in One Week” that will notate each grant submission needed and their listed due date in Sage.

- o The Technical Assistance Specialist sends out a final reminder to Grantees about the upcoming due date for their reporting within Sage.
- o The Technical Assistance Specialist reviews in Sage to confirm that all grant reporting has either been submitted or is labeled “in progress”. If the Technical Assistance Specialist finds that this report is listed as “not started”, this will need to be mentioned within the reminder email, and monitored to ensure the submission is finalized within the reporting due date. Communication with the Grantee is key, and the Technical Assistance Specialist will provide any additional documentation necessary for assisting the grantee in completing the QPR/APR submission.
- o On the Due Date for a QPR/APR Submission the Technical Assistance Specialist will have an individual calendar invite reminder labeled “APR Due Date” that will notate each grant submission needed and their listed due date in Sage.
- o The Technical Assistance Specialist checks within Sage to ensure that required reporting has been completed by grantees.

Rejected APR/QPR Submissions

The Technical Assistance Specialist will review the SAGE database no less than once per week to ensure submissions have been received for Grantee submitted APRs and

QPRs. If a rejection is to occur, the Technical Assistance Specialist will review the submission for additional comments from the local HUD Field Office. Once this occurs, the Technical Assistance should take the following steps:

- o Review the rejected APR/QPR submission and any additional comments/rejection notes provided by the local HUD Field Office
- o Once reviewed, submit an email about the rejection to the designated Grantee, including the following points of information:
 - o Notification of the rejected APR/QPR submission
 - o Project named and Grant ID#
 - o Additional comments provided by HUD for the rejection

The Grantee should review, edit, and resubmit this report within one week of the notification from the Technical Assistance Specialist. If the rejection continues to persist with no edits being made, the Technical Assistance Specialist should follow up weekly with the Grantee to ensure the report is resubmitted as soon as possible.

Budget & Administrative Changes

Budget Line Item Adjustments

Overview

Objective of BLI Adjustments

CoC Projects are required to spend down funds fully during their allotted period of performance, any grant found to have recaptured funds at the end of their period of performance of 10% or more is considered by HUD to have a spending deficiency.

To mitigate this probability with CoC Grantees, it is expected for corrective action to occur once a Grantee has been found to have been under spent by 10% within their active grant cycle. In this case, technical support can be provided through developed spending plans with the grantee, along with discussions to identify barriers to spending. Another resource that can be utilized when grantees are found to be underspent is a Budget Line Item (BLI) Adjustment or also known as a Minor Budget Change to HUD, when applicable.

BLI Adjustments are intended to be utilized when there is a need to spend down funds, with an identified barrier being an allocated amount in one Budget Line Item that could be utilized in another area of a Grant's budget. It is vital to keep in mind that BLI Adjustments do not carry over into grant renewals, and the amount moved from one Budget Line Item to another must be kept under 10% from the source Budget Line Item.

How to Request a BLI Adjustment

A CoC Grantee may request a BLI Adjustment no later than 15 days prior to the end of the outlined grant operating period and may be requested at any time including the first year of a new grant. To submit a formal request for a BLI Adjustment, the grantee must follow the outlined steps below:

- o CoC Funded Grantees can submit their proposal for a Minor Budget Change through the CoC via email to our Executive Director, Katie Wilson (katiwilson@closetohomesa.org). In this email the grantee should include the following:
 - o Project and Agency Name
 - o Project Grant ID Number
 - o Performance Period date for the grant
 - o Reasoning for the line-item adjustment
 - o Amount for the line item-adjustment, along with what line items will be affected
 - o Breakdown of the project's current budget
 - o Breakdown of the project's budget with the requested amendment

An example of a budget breakdown is shown below for reference:

Administration:	\$67,797.00
Rental Assistance:	\$377,640.00
Supportive Services:	\$322,474.00
Total Budget:	\$767,911.00

Approval of BLI Adjustment

Once a BLI Adjustment is submitted, Close to Home's Executive Director will review the request and connect with the Technical Assistance Specialist, along with the Director of System Performance to ensure there are no concerns in approving the request. If no concerns are found, the adjustment will be approved via email by Close to Home's Executive Director, with the local HUD Field Office included as a CC to ensure alignment and clarity across the CoC Grantee, the CoC Lead Agency and HUD.

Grievance & Appeals

Objective of CoC Grievance Appeals

Close to Home is dedicated to the continuous quality improvement of our CoC and ESG funded projects. To achieve this, Close to Home has developed the CoC Grievance

Appeals process, which allows both program participants and local agencies to file a Grievance appeal after submitting a formal grievance against a CoC or ESG funded program. This acts as a safety net to ensure formal grievances are reviewed and the action needed is taken by the CoC. Close to Home must ensure that grievance policies, along with appeals policies, remain consistent and transparent to both program participants and other local agencies.

CoC Grievance Appeals

Grievance Policy

Both CoC and ESG funded projects are required to submit a written copy of their program's rules and their internal grievance process to program participants before the participant begins to receive assistance. If a dispute with a program participant is reviewed during a HUD monitoring the agency will be required to show proof the program participant was notified of the grievance policy at intake.

At a minimum, CoC and ESG agencies must follow the process outlined below:

- o Require participant to submit grievance verbally, in writing, or both. If verbally, it must be documented in case notes.
- o Respond to the participant in writing within 72 hours to confirm receipt and share next steps and a timeline for the process.
- o Designate an impartial entity to substantiate or dismiss the claims, and develop a solution, if appropriate, such as the agency's Board of Directors. Notify the participant of the outcome of the grievance and inform them of their right to appeal to the CoC within 30 days.

CoC Grievance Appeals Policy

In the event a program participant or agency is not satisfied with the Grievance decision noted above, they will have the right to appeal the decision to the CoC through the Homeless Strategic Plan Advisory Board. To file a grievance appeal, a program participant will use the CoC and ESG Grievance Appeals Form, linked below:

- o [CoC and ESG Grievance Appeal Form – English](#)
- o [CoC and ESG Grievance Appeal Form – Spanish](#)

Grievance Appeals may be filed for the following reasons:

- o The decision whether to admit the participant into the program
- o The determination of the household's income or the household's calculated rent
- o Payment/occupancy charge
- o Denial of a request to add a member to the assisted household

- o Whether to terminate the participation of any participant
- o The outcome of a grievance or complaint related to adherence to 24 CFR 578, 24 CFR 576 or the CoC, ESG and Local Written standards of Care.

The appeal process takes place as follows:

- o Participants request an appeal through the CoC and ESG Grievance Appeal Form.
- o The CoC will respond in writing to the appeal requester and the agency involved as soon as possible but no later than thirty calendar days following the request.
- o As part of the appeal, the participant may present written or oral objections, or both, before a person other than the person (or subordinate of that person) who made the decision that is subject to appeal.
- o The participant may be represented in the appeal, but neither the CoC, ESG recipient, nor the provider is responsible for providing or funding someone to represent the participant.
- o The Homeless Strategic Plan Advisory Board will hear appeals.
- o Appeals shall be addressed as soon as possible, but no more than sixty business days after receipt of the appeal by the CoC.
- o Participants and agencies will receive prompt written notification of the outcome of the appeal.

Safety & Emergency Protocols

CoC Grantee Emergency Transfer Plans

Overview

Objective of Emergency Transfer Plans

Every CoC and ESG Funded agency is required by HUD to develop and maintain an Emergency Transfer Plan within their project Policies and Procedures. Emergency Transfer Plans are intended to ensure the safe and secured transfer of program participants from one unit to a new safe unit after the occurrence of a sexual assault, or if the tenant believes they are at risk of imminent harm if they remain housed in their current unit. An Emergency Transfer Plan can mitigate the risk of additional trauma and harm that the program participant may face and can truly be the difference between life and death of a program participant, which only further highlights the importance of these plans being in place prior to any transfer being requested.

Agency Level Requirements for Emergency Transfer Plans

In order to maintain compliance with the CoC, ESG, and Local Written Standards of Care, Permanent Supportive Housing, Rapid Rehousing, and Transitional Housing projects are required to:

- o Follow the CoC's Outlined Emergency Transfer Plan;
- o Make the transfer plan publicly available whenever feasible;
- o Make the plan available to participants and community partners upon request;
- o Ensure the refusal of a transfer unit is not a basis for terminating a tenant from assistance.

All emergency transfer plans must explicitly describe the prioritization of survivors receiving transfers with respect to others still waiting for units. If a safe unit is not immediately available, the participant must have priority over all other applicants.

Eligibility for an Emergency Transfer

Program Participants are eligible for an emergency transfer based on the following criteria outlined by HUD:

- o The tenant reasonably believes there is a threat of imminent harm from further violence if they remain in their current housing; OR
- o In the case of a tenant who is a victim of sexual assault: either they reasonably believe there is a threat of imminent harm from further violence if they remain in their current housing OR the sexual assault occurred on the premises of their current housing during the 90-calendar-day period preceding the date of their transfer request.

Providers are prohibited from considering anything other than a tenant's eligibility, as listed above, when processing an Emergency Transfer request. Examples of prohibited considerations include the following:

- o Gender
- o Mental Health
- o Family Size/Configuration
- o Age
- o Race or ethnicity
- o Perceived reliability

Emergency Transfer Plan Documentation

In order to begin the transfer process, the tenant must expressly request the transfer, these are most often provided in writing but are not required to be. Emergency Transfer requests must be documented by the CoC Grantee with both the initial request and the

following outcome. Outcomes must be reported to HUD annually, and records must be maintained for at least 3 years, per HUD requirements.

Additionally, HUD has allowed Grantees to have allowable documentation requirements for their project's Emergency Transfer Plan. Emergency Transfer Plans may require written self certification from the survivor to document eligibility for an emergency transfer. Providers may choose to ask the survivors for documentation of the incident if the survivor has not already provided this documentation.

Internal and External Emergency Transfers

Internal emergency transfers include the relocation of a tenant to another unit where the individual would not be categorized as a new applicant. This would be outlined as follows:

- o The tenant may reside in the new unit without undergoing an application process.
- o This would be offered if an internal unit is immediately available and if an internal unit becomes available later.

External emergency transfers require the relocation of a tenant to another unit where they would be categorized as a new applicant. This would be outlined as follows:

- o The tenant must undergo an application process for the new unit.
- o This would be offered if an internal unit is not immediately available.

Appendices & Templates

Grantee Support: Question Submission and Frequently Asked Questions

Purpose

To streamline grantee support, improve transparency, and build a searchable knowledge base by managing all grantee questions through Asana and compiling a publicly accessible Frequently Asked Questions (FAQs) page on the CTH website.

Building and Seeding the Initial FAQ

Compile FAQs from:

- o Previously asked questions in internal systems
- o Other CoCs (via Google search and peer networks)
- o Recurring technical assistance emails
- o Applicable HUD AAQ Responses

Categorize into:

- o Program Requirements & Eligible expenses
- o Budget & Financial Reporting
- o Match & Leverage
- o HMIS & Data Quality
- o Monitoring & Compliance
- o Grant Recipient Responsibilities

Submission of Questions

Grantees must submit all questions using the designated “Grantee Guidance Submission Form” in Asana.

- o The form includes the following fields:
 - o Grantee name (agency/organization)
 - o POC contact/person submitting the ticket
 - o Subject & description of the question (from selections)
 - o Program Requirements & Eligible expenses
 - o Budget & Financial Reporting
 - o Match & Leverage
 - o HMIS & Data Quality
 - o Monitoring & Compliance
 - o Grant Recipient Responsibilities
 - o Grant Name
 - o Grant type (i.e., TH, PSH, etc.)
 - o Urgency level:
 - o Standard (response within five business days)
 - o Urgent (response within two business days; justification required)

Automated Confirmation and Initial Response

Once submitted, an automated email confirmation is sent to the grantee with the following message:

Thank you for submitting your question.

Our team has received your request and will respond:

- o *Within 5 business days for standard questions*
- o *Within 2 business days for urgent matters*

If your question is urgent, please ensure you have selected the "Urgent" box and provided justification in the form. In the meantime, you may find helpful information on our Grantee FAQ page (create link once document is built).

Thank you,

CTH

Internal Review and Assignment

CTH TA Specialist reviews all submissions daily.

Questions are tagged in Asana by:

- o Urgency (Standard or Urgent)
- o Topic Category (e.g., Financial Reporting, Match Requirements, HMIS, Program Performance)

CTH TA Specialist researches the answer to questions and escalates to leadership when needed or warranted.

Drafting and Sending the Response

The CTH TA Specialist drafts a response and sends it to the grantee via direct email (with the ticket number in the subject line).

The response must be:

- o Clear and aligned with CoC and HUD policy
- o Linked to relevant documents or resources when possible
- o If the question has been escalated to leadership or legal if necessary

Email responses are linked to the corresponding ticket in Asana. Once resolved, the item is marked as resolved and moved to the archive section on the board. Email responses should include the Director of System Performance as a CC.

Building the Grantee FAQ

Each resolved question is reviewed by the TA Specialist and Director of System Performance, when applicable, to determine if it is:

- o Repetitive or broadly relevant
- o Suitable for the public FAQ

TA Specialist submits a communication request and meets with the Communications team to add relevant Q&A to public webpage (partner portal?) and include in subsequent month's newsletter.

Communications team:

- o Ensures approved responses are rewritten into accessible, person-centered language.
- o Sends “new FAQ updates” in newsletter
- o Added to the internal Grantee FAQ master list and posted monthly to the public-facing Grantee FAQ page on the website

Handling Urgent Requests

Urgent tickets are flagged in Asana and monitored daily.

TA Specialist reviews any urgency and staffs with leadership immediately, when applicable.

Turnaround time: 2 business days or less.

If the resolution is delayed, a status update will be sent to the grantee within one business day.

FAQ Integration & Maintenance Plan

Create and maintain an excel spreadsheet in the Server entitled “Grantee FAQ Log”

with fields like:

- o Date Added
- o Category
- o Question
- o Answer
- o Link to Ticket (Asana)
- o Added to Website (Yes/No)

Quality Assurance and Reporting

Data Analyst generates a monthly Asana report:

- o Number of questions submitted
- o % resolved on time
- o FAQs added
- o Common themes or knowledge gaps

Insights inform:

- o Training topics/Items reviewed during Site Visits
- o Policy clarifications/IFCCs
- o Newsletter highlights

Roles and Responsibilities

Role	Responsibilities
Grantee	<ul style="list-style-type: none"> ● Submit the question form accurately. ● Flag urgent issues, ● Consult the FAQ before submitting
TA Specialist (CTH)	<ul style="list-style-type: none"> ● Triage submissions, ● Research answers, ● Draft timely and accurate responses ● Document key insights, ● Oversee FAQ ● Escalate to leadership, when applicable ● Submits item for adding to the FAQs list on the website and newsletter.
System Performance Director	<ul style="list-style-type: none"> ● Monitor deadlines, ● Manage Escalations ● Review escalated cases or unclear policy interpretations, and seek additional leadership guidance when applicable
Communications	<ul style="list-style-type: none"> ● Adds FAQ to newsletter ● Update website FAQ and track clicks/hits
Data Analyst	<ul style="list-style-type: none"> ● Monthly QA to ensure questions are being answered timely, identify themes (same question month over month, etc.), and ensure internal procedures are reflected in public website.