



City of LA Housing and Homelessness Committee

FY 2025 CoC Program NOFO Competition

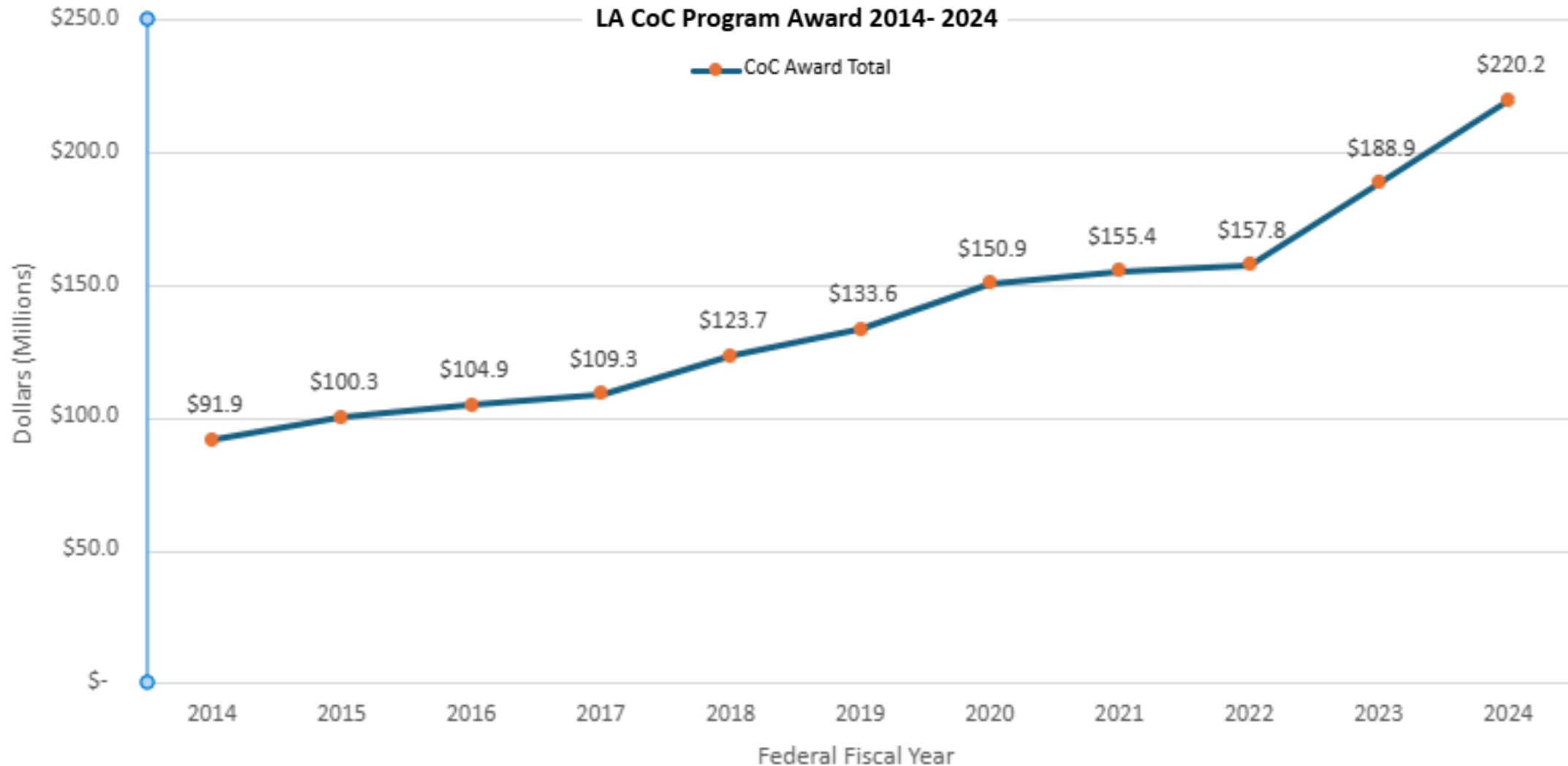
Nathaniel VerGow, Deputy Chief Programs Officer

December 3, 2025

LA CoC Program Award Over Time

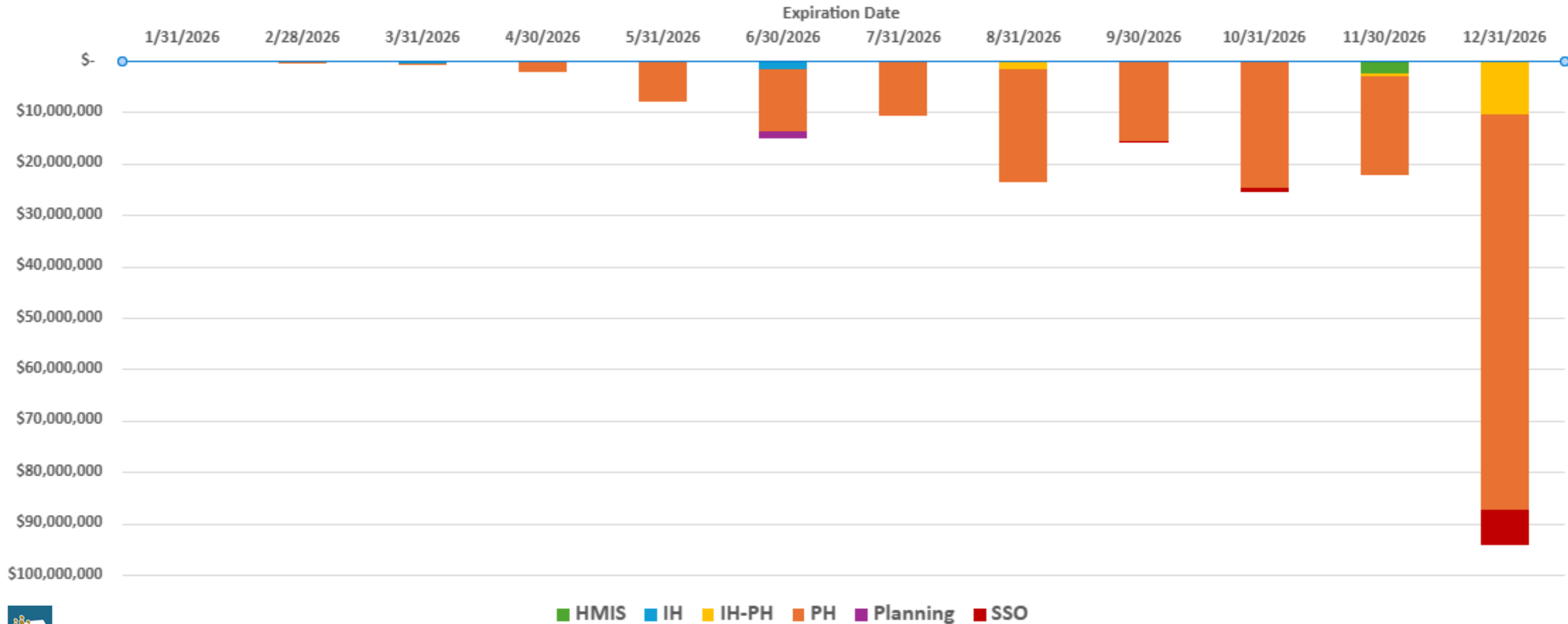
Source: HUD CoC Award Summary Reports

LAHSA (CoC Lead) has led the LA CoC Program portfolio through significant growth (more than 2x in 10 years)



When Does Current CoC Funding Expire?

LA CoC Program Funding Expiring in 2026



FY 2025 Funding & Major Shifts

HUD released the CoC NOFO with major, sharply contrasting changes, discontinuing the 2-year NOFO. Below is the LA CoC's eligible funding.

Funding Type	Eligible Amount
Renewal Funding	\$217.2 Million
New Funding: CoC Bonus	\$43.4 Million
New Funding: DV Bonus	\$5.0 Million
CoC Planning	\$1.5 Million
TOTAL	\$267.1 Million

FY 2025 CoC City Funding for Rental Assistance

LAHSA’s analysis of its own portfolio to detail projects located inside the City vs. outside the City is ongoing, but it is safe to say the City currently receives more than half of the total Rental Assistance funding.

Funding Type	Eligible Amount
HACLA Share of CoC Rental Assistance Funding	43%
LAHS Share of CoC Rental Assistance Funding*	25%

**LAHSA projects are locate both inside and outside the City.*

Major Change: PH Cap & Tier 1 Risk

New 30% Cap on Permanent Housing

A new cap applies to *all* Permanent Housing (PH) projects, new and renewal. The LA CoC's cap is approximately \$65.2M. This forces a shift from existing PH projects to new, high-service models.

Tier 1 Reduced to 30%

“Protected” Tier 1 is drastically reduced from 90% to 30%.
Critical Impact: LA must place 70% of its renewal projects in Tier 2, creating significant new and unprecedented funding risk.

Major Change: New Project Requirements



New PSH

Must serve elderly individuals or those with a physical disability, and **require** participation in supportive services.



New Transitional Housing

Must provide **40 hours** of customized supportive services per program participant.



New Street Outreach (SSO)

Must partner with law enforcement and cooperate with the enforcement of local laws (e.g., public camping, drug use).

Major Change: New HUD Policy Priorities



“Prioritizing Treatment & Recovery”: replaces “Housing First.” Mandates service participation requirements.



“Advancing Public Safety”: (New Priority). Requires cooperation with law enforcement; cites *Grants Pass* decision.



“Ending... Crisis on Our Streets” replaces “Ending... for All.” Focuses on reducing encampments and public camping.



New Prohibitions: Targets CoCs that previously used harm reduction, DEI, or affirmed LGBTQ+ populations.

Key Competition Deadlines



Dec 15, 2025

Project Applications due in e-snaps.



Dec 31, 2025

CoC must send written notification
to all applicants.



Jan 14, 2026

Final Consolidated Application
due to HUD (5:00 PM PST).

Questions / Discussion

**Attachment: *LAHSA Memo dated 11-14-2025
to CoC Board Re: 2025 CoC NOFO Overview***



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MEMO

To: Board of Commissioners, LAHSA
Los Angeles Continuum of Care Board

From: Jessica Reed, Associate Director, CoC Planning, LAHSA

Date: November 14, 2025

CC: Gita O'Neill, Interim Chief Executive Officer, LAHSA

Re: Summary of FY 2025 CoC Program Competition Notice of Funding Opportunity

Background and Funding Availability

The U.S. Department of Housing and Urban Development (HUD) released the Fiscal Year (FY) FY 2025 HUD Continuum of Care (CoC) Program Competition Notice of Funding Opportunity (NOFO) on November 13, 2025, with approximately \$3.9 billion in funding available. The NOFO also includes approximately \$52 million for another round of Domestic Violence (DV) Bonus projects, approximately \$228 million for competitive renewal and replacement for expiring YHDP grants, \$129 million for the renewal of projects awarded by the special unsheltered NOFO (or, SUNOFO), and a non-specified total allocation for CoC Bonus funding. **The LA CoC is eligible for approximately \$217.2 million in renewal funding, up to \$5 million in DV Bonus funding, approximately \$43.4 million in CoC Bonus funding, and \$1.5 million in CoC Planning funding.**

HUD clarified that this NOFO rescinds and supersedes any mention of FY 2025 CoC award funding in the FY 2024 CoC NOFO competition and discontinues the two-year NOFO that CoCs successfully advocated for under the previous federal administration. HUD is implementing major changes to the NOFO in FY 2025 that sharply contrast with previous competitions. Below is a summary of the most significant changes contained in the NOFO (and referencing both official HUD materials and analyses by the National Alliance to End Homelessness).

Table 1: Funding Available for CA-600 Los Angeles City & County CoC¹

Preliminary Pro Rata Need	Estimated Annual Renewal Demand	Tier 1 (30% of ARD)	CoC Bonus	DV Bonus	CoC Planning
\$143,558,553	\$217,211,382	\$65,163,415	\$43,442,276	\$5,000,000	\$1,500,000

¹ Source: FY 2025 Continuum of Care Competition and Youth Homelessness Demonstration Program Grants NOFO and Estimated Annual Renewal Demand Report
<https://www.hud.gov/sites/dfiles/CPD/documents/CoC/FY25-CoC-Estimated-Annual-Renewal-Demand-Amount-Report.pdf>

Renewal and New Projects

HUD is introducing a cap on all permanent housing (PH) projects a CoC submits for funding consideration, regardless of renewal and new project status. **The PH cap is equivalent to 30 percent of a CoC's Annual Renewal Demand (ARD), which in the LA CoC amounts to approximately \$65.2 million.** CoCs must shift funding from existing PH projects that exceed this cap toward new projects that are aligned with the administration's priorities, particularly transitional housing with high service requirements.

Renewal Projects

HUD is allowing the following project types to seek renewal funding (with PH projects subject to the overall PH cap): Permanent supportive housing (PSH), rapid rehousing (RRH), joint component rapid rehousing/transitional housing (RRH-TH), transitional housing (TH), safe haven (SH), supportive services only (SSO; coordinated entry and non-coordinated entry), and dedicated Homeless Management Information System (HMIS) projects.

New Projects

HUD is making the following project types eligible for new funding (with PH projects subject to the overall PH cap): Permanent supportive housing (PSH), rapid rehousing (RRH), transitional housing (TH), supportive services only (SSO; inclusive of coordinated entry and non-coordinated entry focused projects such as street outreach), dedicated Homeless Management Information System (HMIS), and CoC planning projects.

New PSH projects must be designed to serve elderly individuals and/ or individuals with a physical disability/impairment (not including substance use disorder) and require participation in supportive services. New TH projects will be required to provide 40 hours of customized services per program participant (except for participants over 62 or with a physical disability/impairment). New SSO projects for street outreach will be required to demonstrate that the project applicant has a history of partnering with first responders and law enforcement and will cooperate with the enforcement of local laws such as public camping and public drug use.

Ranking and Selection Process

Beyond the standard tiering process, HUD is introducing considerable discretion into how it will make funding decisions and includes new ranking and selection criteria that features new prohibitions which can disqualify projects and create significant new compliance risks. Some of these new prohibitions target CoCs that previously used racial preferences (or proxies), engaged in harm reduction programming, and supported diversity, equity, and inclusion efforts, and/or affirmed LGBTQ+ populations.

Tier 1 and 2

HUD is requiring CoCs to rank all projects, including YHDP projects (previously renewed non-competitively), into two tiers to indicate to HUD which projects are prioritized for funding.

Different from prior competitions, **Tier 1 is equal to 30 percent of the CoC's Annual Renewal Demand (ARD) for all projects eligible for renewal** (compared to 90% in FY 2024). Project applications in Tier 1 will be conditionally selected from the highest scoring CoC application to the lowest scoring CoC application and according to the rank assigned by the CoC on the CoC Priority Listing, provided the project applications pass project eligibility and quality threshold review. This change in the Tier 1 formula is significant because it means that the LA CoC will have to place *70 percent* of renewal projects in Tier 2, which carries with it greater risk of not being awarded funding.

Tier 2 is the difference between T

ier 1 and the maximum amount of renewal, reallocation, CoC and DV Bonus funds that a CoC can apply for (excluding CoC Planning). Project applications placed in Tier 2 will be assessed for eligibility and quality threshold requirements, and funding will be determined using the following scoring factors on a 100-point scale:

- **CoC Application Score (i.e., “Merit Review Score”)** = up to 50 points;
- **CoC Project Ranking** = up to 40 points; and
- **Service Participation (NEW; previously Housing First)** = up to 10 points for projects that have or will incorporate supportive service participation requirements in their program design, based on individual need and evidenced in an occupancy agreement or equivalent document.

HUD will fund Tier 2 projects based upon their respective individual scores, rather than by CoC, until it has allocated all available competition funds.

Table 2: Changes in FY 2025 CoC Application Scoring - Overview

Section	Title	2024 Points	2025 Points
1	CoC Coordination and Engagement	84	81
2	Project Capacity, Review, and Ranking	28	9
3	Homeless Management Information System	9	N/A
4	Point-in-Time Count	5	N/A
5	System Performance	60	40
6	Coordination with Housing and Healthcare	14	N/A
Subtotal		200	130
7	<i>Bonus Points: CoC Merger Bonus</i>	25	15
8	<i>Bonus Points: Policy Initiative Preference</i>	N/A	4
Total		225	149

Table 3: Changes in HUD’s Homeless Policy Priorities for FY 2025

FY 2025 Priority	Detail (partial)	Key Changes from FY 2024
1. <i>Ending the Crisis of Homelessness on Our Streets</i>	Prioritizes CoCs that ‘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.’	Replaces and combines <i>Ending Homelessness for All Persons</i> and <i>Reducing Unsheltered Homelessness</i>
2. <i>Prioritizing Treatment and Recovery</i>	Prioritizes CoCs 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.’	Replaces <i>Use a Housing First Approach</i>
3. <i>Advancing Public Safety</i>	Prioritizes CoCs that ‘cooperate with law enforcement to advance public safety for	New priority

FY 2025 Priority	Detail (partial)	Key Changes from FY 2024
	the entire community impacted by homelessness.’ [HUD cited the Supreme Court decision in <i>Grants Pass v. Johnson</i> as upholding the authority of local governments to prohibit public camping.]	
4. <i>Promoting Self-Sufficiency</i>	Prioritizes CoCs that partner with workforce development centers (etc.) to increase employment and earned income for program participants.	New priority
5. <i>Improving Outcomes</i>	Prioritizes CoCs that reduce homelessness by ‘promoting self-sufficiency, increasing employment income over government assistance, and promoting treatment and recovery.’	Replaces <i>Improving Systems Performance</i>
6. <i>Minimizing Trauma</i>	Prioritizes CoCs that encourage trauma informed care and safety (esp. for youth and survivors), including use of ‘safe, single-sex spaces’ for women experiencing homelessness.	New priority

Key Deadlines and Next Steps

HUD requires CoCs to meet the following competition deadlines. As the LA CoC’s Collaborative Applicant, LAHSA will coordinate all aspects of the CoC’s Consolidated Application to HUD, including new and renewal project solicitation, with final approval by the LAHSA Commission.

- **Project Application deadline** (*in e-snaps*): **Monday, December 15, 2025** (30 days before submission deadline; to be confirmed by HUD)
- **CoC Written Notification to Applicants** (Projects Accepted/Reduced): **Wednesday, December 31, 2025** (15 days before application deadline; to be confirmed by HUD)
- **Deadline for submission to HUD**: **5:00 PM PST/8:00 PM EST on Wednesday, January 14, 2026**