



**OAKLAND/BERKELEY/ALAMEDA COUNTY CONTINUUM OF CARE (CoC)
 2025 CoC Notice of Funding Opportunity (NOFO) LOCAL COMPETITION
 REVIEW AND RANKING POLICIES
 December 3, 2025**

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OVERVIEW

The federal Department of Housing and Urban Development (HUD) provides almost \$3 billion a year in funding for homeless housing and services nationwide. This funding is distributed through Continuums of Care (CoCs) -- regional organizations that meet regularly to develop and implement systems and programs to meet the needs of people experiencing homelessness.

Each year, HUD oversees a national funding competition in which applicant organizations may request funding to renew existing CoC grants and to create new projects. HUD requires each CoC to manage a fair and transparent process to evaluate and rank projects in order of their funding priority. Projects that are eligible for funding and that rank highest (known as Tier 1) will receive federal funding, while those at bottom of the list (Tier 2) may or may not receive funding, depending on how the CoC as a whole performs relative to other CoCs in the national competition and the project's placement on the list. Projects that are excluded from the list altogether will not receive federal funding.

Note on Timing and Uncertainties: HUD released the FY 2025 CoC NOFO on November 13, 2025, which is much later in the year than usual. Each CoC must submit their application to HUD by January 14, 2026; which provides 60 days to respond instead of the usual 90. In addition to the compressed timeline, HUD is introducing many new policy priorities and requirements which will require changes in the local competition process. As of the date these policies were finalized, HUD had not yet opened its E-SNAPS submission portal nor published detailed instructions for the application. **The CoC may amend this policy document as additional information is received from HUD.** Any amendments will be broadly announced and published on the EveryOne Home webpage.

A. ROLES AND RESPONSIBILITIES

1. Leadership Board

In the Oakland/Berkeley/Alameda County CoC, the Leadership Board functions as the Continuum of Care (CoC) Board required by the CoC Interim Rule to act on behalf of the membership to ensure CoC responsibilities are fulfilled, including preparing the application for Continuum of Care funds. Under its Roles and Responsibilities, the Leadership Board:

- Recommends guiding principles and strategic direction to the NOFO Committee based on HUD NOFO guidelines.
- Designs, operates and follows a collaborative process for submitting the CoC NOFO application to HUD.
- Delegates responsibilities to Committees and Workgroups as specified in the 2022 Alameda County Continuum of Care/EveryOne Home Governance Charter, including delegating to the NOFO Committee the role of evaluating projects' performance as an independent rating and ranking panel.

2. Strategy, Funding and Compliance Committee (SFC)

The SFC is responsible for supporting the CoC application process. The SFC drafts Strategic Direction for approval by the Leadership Board and also oversees the year-round monitoring process for CoC grantees.

3. NOFO Committee and NOFO Response Team (NRT)

The CoC Operations Support Provider (Homebase) will recruit NOFO Committee members and propose a

NOFO Committee Roster for the SFC and Leadership Board's approval. NOFO Committee members will be unbiased and non-conflicted and represent neutral organizations, stakeholders and individuals with lived experience. "Non-conflicted" and neutral organizations are those that are not currently applying for and/or receiving CoC funding distributed by the Alameda County CoC. They will sign a form verifying they do not have a conflict of interest.

The NOFO Committee conducts the annual HUD Competition's local rating and ranking process for projects seeking Continuum of Care funds, reviews applications submitted, and prepares ranked recommendations for funding.

Specifically, the NOFO Committee:

- Integrates funding priorities and strategic direction from the Leadership Board.
- Develops and adopts the policies governing the local competition process.
- Develops and adopts scoring criteria in compliance with the requirements of the annual NOFO.
- Develops local applications for existing and new projects.
- Reviews and scores proposals.
- Conducts the Rating and Ranking process and makes final recommendations of the Project Priority List which is approved by non- conflicted members of the Leadership Board to be included in the CoC Consolidated application package.

At its regular meeting on November 20, 2025 the Leadership Board created and seated a small NOFO Response Team (NRT) tasked with developing and implementing a strategic response to the FY 2025 NOFO in coordination with the NOFO committee. This smaller group was deemed necessary due to the very short NOFO timeline and new requirements established by HUD. The NRT consists of 2 members of Alameda County H&H (the Collaborative Applicant), 2 city representatives, 1 provider representative and 1 community member or provider representative who is also a person with lived experience of homelessness. The NRT will lead the process of developing funding priorities, scoring criteria and application process, in consultation with the NOFO committee. Both the NRT and NOFO committee may be involved in scoring applications and determining the final Project Priority list.

4. Appeals Panel

If an applicant contests their rating or ranking, they may appeal. The Appeals Panel, comprised of non-conflicted members seated for each NOFO round, reviews any appeals made by CoC Project Applicants to the local competition's Project Priority list, as governed by the Alameda County HUD CoC Appeals Process established in 2017 and revised in 2022 (detailed in Section C of this process document). The NRT will be responsible for initial review of appeals to determine if they have stated a legitimate grounds for appeal as per Section C. Appeals that raise a legitimate issue will be heard by the Appeals Panel. Their decisions are final.

5. Collaborative Applicant

As reflected in the Alameda County Continuum of Care/EveryOne Home Governance Charter, adopted in February 2022, Alameda County Housing and Homelessness Services (H&H) (a division of Alameda County Health) serves as the Collaborative Applicant for the Continuum of Care pursuant to 24 CFR 578.3. As the Collaborative Applicant, H&H will review the budgets and narratives of all Project Applications and facilitate the submission of all Project Applications after they have been rated, ranked and approved by the NOFO

Committee. H&H will work with the CoC's consultants to complete and submit the Continuum of Care's Consolidated Application.

6. Continuum of Care Operations Support Provider and NOFO Consultant

H&H has designated Homebase to serve as the CoC Operations Support Provider and Kate Bristol Consulting (KBC) to serve as the NOFO Consultant. With a portion of the federal CoC planning grant, KBC and Homebase conduct activities related to the annual Local HUD Continuum of Care Program Competition (NOFO), including providing analysis, scoring feedback, and other guidance on HUD priorities; supporting the development of the SFC and Leadership Board strategic direction to the NOFO Committee; scoring objective elements of the application; and convening and providing support to the NOFO Committee and Appeals Panel, among other duties.

All decisions regarding the Local HUD Continuum of Care Program Competition are subject to review and approval by the Leadership Board and NOFO Committee. In addition, Homebase and KBC value community input and discussion and will create opportunities for grantees to provide feedback on changes to process and tools to the maximum extent possible given the very compressed timeline for the 2025 NOFO.

B. 2025 COC LOCAL COMPETITION PROCESS

1. Application Process

- The Local HUD Continuum of Care Program Competition (NOFO) application process will be launched after HUD releases the Notice of Funding Opportunity and a timeline will be developed by KBC the NRT to adhere to mandated deadlines.
- KBC and the Collaborative Applicant will review and analyze the HUD NOFO and make recommendations to the Leadership Board and NOFO Committee regarding the local competition process.
- The Leadership Board will develop and approve strategic direction to provide to the NRT and NOFO committee for the implementation of the local competition. For FY 2025, the Leadership Board approved the following Strategic Direction at its regular meeting on November 20, 2025:
 1. *Develop funding priorities/criteria to preserve as much CoC funding as possible, while supporting the County's strategic use of available local funding to potentially preserve lost CoC dollars.*
 2. *Create a streamlined local application and ranking process to implement the identified priorities.*
 3. *Rank renewal projects based on objective funding priorities/factors (e.g. project type, performance measures).*
 4. *Strategically solicit and evaluate new projects to fill system gaps.*
- The NRT, in consultation with the NOFO committee, will develop and approve the local competition policies, scoring factors and application questions.
- KBC and the Collaborative Applicant will conduct Project Performance Evaluation using APRs, HMIS and other comparable data sources, and relevant documentation to score objective criteria. Providers will be notified of the date that APRs will be pulled so that projects can clean-up data in advance. Data will be collected from the same time period for all projects.
- Applicants that are victim services organizations and therefore do not participate in HMIS must provide an APR from their HUD-mandated compatible database by the published local deadline.

- Homebase will release an announcement of available funding and competition kick-off meeting for both new and renewal grantees. Funding announcements will be broadly distributed via email to the provider community and posted on the EveryOne Home website.
- Applicants, both renewing and prospective, will be invited to attend a NOFO Competition Kick Off Meeting, receive application materials, and have adequate time to complete and submit their Local Application within HUD's deadlines.
- Homebase and KBC will offer a Frequently Asked Questions (FAQ) period and will post responses to all questions in writing on a regular basis. Agency specific questions will be responded to directly. Questions and answers that would be relevant to all applicants will be responded to directly and will be posted in published FAQs on the EveryOne Home webpage. Questions that KBC and Homebase do not have information to answer will be forwarded to HUD's FAQ email.

2. Eligible Applications

In 2025, the CoC will accept the following types of applications:

- Renewals:** Current grant recipients may apply for renewal of their Permanent Supportive Housing (PSH), Rapid Rehousing (RRH), Joint Transitional Housing and Rapid Re-housing (TH-RRH), Transitional Housing (TH), Support Services Only (SS) (including SSO-CE), and Homeless Management Information System (HMIS grants).
- New Projects:** Interested organizations may submit applications for:
 - New Transitional Housing (TH)
 - New Supportive Services Only (SSO) grants, including SSO-outreach, SSO-standalone services, and SSO-Coordinated Entry (CE) grants.
 - New Homeless Management Information System (HMIS) grants.
 - New permanent housing grants (permanent supportive housing or rapid rehousing) will not be considered for funding. New joint component grants (TH-RRH) are not permitted under the NOFO.
- Transition Projects:** Any current grant recipient may apply to transition their existing grant to a different component (e.g. from TH-RRH to TH), except for DV bonus grant recipients. YHDP grant recipients may transition to a different component using the YHDP replacement process.
- Consolidation:** Current grant recipients may request to consolidate two or more grants of the same grant component into a single grant (e.g. two RRH projects can become one merged RRH project).

3. Ranking Policy

- All submitted projects will be reviewed by the NOFO Consultant and Collaborative Applicant to determine if they meet threshold requirements. Applications that do not pass threshold will not be scored. A determination that a project does not meet threshold requirements cannot be appealed (see section on Appeals, below).
- All projects that pass threshold review will be scored and ranked in accordance with the criteria and process approved by the NRT and NOFO Committee, published on the EveryOne Home website, and explained at the NOFO Competition Kick Off meeting.
- Renewal project scoring factors will include performance measures calculated using HMIS data.
- In the FY 2025 NOFO, HUD has established a Tier 1 cut off that is equivalent to 30% of the CoC's annual renewal demand (ARD) and also established a cap on Permanent Housing (PH) equal to 30% of the CoC's ARD. In Alameda County, this translates to a Tier 1 of \$18 million and an \$18 million cap on permanent housing (including PSH, RRH and TH-RRH).

- The adopted scoring factors will align to the following funding priorities:
 - First priority: renewing PSH and RRH (up to the 30% PH cap)
 - Second priority: renewing TH (including renewals transitioning to TH).
 - Third priority: renewing Supportive Services Only (SSO)
 - Fourth priority: new applications.
- PSH and RRH projects will receive higher points than other project types and will be placed into Tier 1. However, there will be \$29 million in PSH and RRH that does not fit within the 30% PH cap. Any project falling below the cap will be re-allocated and that funding will be available for new projects. *PSH and RRH grant recipients are strongly encouraged to identify alternative funding sources for their projects.*
- Any PH project (PSH, RRH or TH-RRH) may choose to transition their grant to the Transitional Housing (TH) component. Grantees should carefully review the NOFO to understand the transition process. TH-RRH projects are strongly encouraged to transition since they will not be prioritized into Tier 1 and will not fit within the 30% PH cap. YHDP TH-RRH must use the YHDP replacement process to transition. HUD’s NOFO has not made clear whether DV bonus TH-RRH may use the transition process.
- Renewing HMIS and Coordinated Entry (CE) Projects will not receive scores. As critical infrastructure for the CoC, HMIS and CE projects will be placed automatically at the top of Tier 2.
- Projects renewing for the first time that do not have one year of performance data will be scored on the basis of partial data or by taking the average score for projects of a similar type, whichever is higher.
- Applicants proposing to consolidate two or more grants must submit each grant as a separate local application for scoring and ranking, as per HUD requirements.
- Grants that were previously consolidated and for which one or more of the constituent grants does not have a year of performance data (due to being new) will be evaluated based only on the performance of the grant that has data.

4. Reallocation Policy

- About \$29 million in grants for permanent housing will fall outside the PH cap imposed by HUD and cannot be submitted for renewal funding. Recipients of PH grants are strongly encouraged to consider voluntary re-allocation. Grantees that are able to identify alternative funding sources for their project have the option to re-allocate their grant in full and make those funds available for new project applications.
- Any projects that have underspending of their grant funds are encouraged to voluntarily offer to reduce their grant award to support other projects in our Continuum of Care.

5. Review and Scoring of Applications

- Project applicants must submit the local application and required attachments by the published deadline.
- KBC and the Collaborative Applicant will review applications for completeness and will offer applicants an opportunity to cure technical deficiencies by submitting missing items. Applicants may not submit any additional information after the published deadline unless specifically requested to cure a technical deficiency or by the NRT or NOFO committee as part of its application review and scoring process. The NRT and/or NOFO committee shall have discretion as to whether to consider

any materials submitted by the applicant after the local competition deadline.

- KBC and the Collaborative Applicant will determine which submitted projects meet threshold requirements. Projects that do not pass threshold review will not be scored.
- KBC and the Collaborative Applicant will provide training to the NRT and/or NOFO Committee on how to review and score applications according to the approved scoring criteria and process. Objective factors (such as project performance drawn from HMIS data) will be calculated by KBC and the Collaborative Applicant and provided to the NRT and/or NOFO committee for review and to ask questions. The NRT and/or NOFO Committee will review and score any supplemental narratives for specific criteria. The NRT and/or NOFO Committee members will finalize individual scores for each project prior to the Rating and Ranking session.
- Grantees must also complete a HUD Project Application in *E-SNAPS* by the date determined by the local process.
- At the Rating and Ranking session, scores will be tabulated, and Project Applications will be ranked and placed in either Tier 1 or Tier 2. The NRT and/or NOFO Committee will place projects in score order. The NRT and/or NOFO Committee may reorder projects within the parameters set by the Leadership Board's Strategic Direction and also has discretion to change project placement in order to maximize the overall competitiveness of the application and maximize the CoC's chances to secure funding.
- The NRT and/or NOFO Committee has the authority to decide on all straddling situations.
- If there are not enough new applications submitted by the local competition deadline to request the maximum amount of funding allocated by HUD, the NRT and/or NOFO committee has the discretion to work with KBC to solicit additional projects. Any additional project submitted after the local deadline will automatically be placed at the bottom of Tier 2.
- The NRT and/or NOFO committee may request that new projects adjust their budgets (either increasing or decreasing) to align to available funding for new projects.
- At the conclusion of the Rating and Ranking session, the NRT and/or NOFO Committee will finalize the Project Priority List for approval by the Leadership Board. If the Committee is recommending that any renewal projects are moved outside of their scored order, they will include a written explanation to the Leadership Board as to the reasoning for the recommendation.
- KBC and the Collaborative Applicant will bring the final CoC Rating and Ranking List to the non-conflicted members of the Leadership Board for review and approval.
- The Leadership Board will also approve the submission of the Consolidated Application to HUD by the Collaborative Applicant (H&H).

6. Communicating the Results of the Local Competition

- Final scoring results will be delivered to applicants via email, along with next steps and information on the Appeals Process.
- All applicants that are eligible for an appeal will have 2 business days to submit the Appeal. Appeals must follow the written format established by the NRT and/or NOFO Committee and must state an eligible grounds for appeal (see section below). The NRT will determine if Appeals state an eligible grounds and only those deemed to do so will be heard by the Appeals Panel.
- Appeals will be reviewed by non-conflicted members of the Appeals Panel, seated by the Leadership Board.
- Applicants who submit an appeal will be invited to an interview with the Appeals Panel as part of the

Appeals process.

- KBC and the Collaborative Applicant will generate the final Project Priority List as approved by the non-conflicted members of the of the Leadership Board, to be posted on the EveryOne Home website and announced on the EveryOne Home mailing list and social media accounts.
- The Project Priority List will be submitted to HUD along with the County-wide Consolidated Application by HUD's NOFO deadline.
- All project applicants will be invited to attend a NOFO debrief.

C. APPEALS PROCESS

The NOFO Committee developed a formal appeals process for the HUD CoC NOFA local competition in 2017, which was amended and approved by the HUD CoC Committee on 7/16/2019. Clarifying updates to the policy were made in 2022. The Appeals Panel, which is seated by the CoC Standards, Compliance and Funding Committee, consists of three non-conflicted individuals.

1. Grounds for Appeal

The Applicant may appeal if they believe that one or more of the following has taken place:

- a. An application was not evaluated according to the published local NOFO process.
- b. There was a scoring error in the evaluation of the project
- c. An application was evaluated in a way that violates federal regulations.

The following are NOT eligible grounds for appeal:

- a. Errors or omissions by project Applicants.
- b. Determination that a new project does not pass threshold review.
- c. Dissatisfaction with Project's scores.
- d. Dissatisfaction with Project placement on the Priority List
- e. Placement in Tier 2
- f. Need for funds.

Appeals submitted after the appeal deadline will not be accepted.

2. Appeals Process

- a. The NRT and/or NOFO Committee will release the first Project Priority List, including dollar amounts and point scores. Each applicant will receive a breakdown of the scores for each of their applications.
- b. In the unlikely event of a mathematical error, Applicants must report the issue to KBC and the Collaborative Applicant within 24 hours of release of the Project Priority List for the error to be corrected. The Project Priority List and scores will be reissued with the appropriate corrections at the time of the release of the final List.
- c. Applicant projects have 2 business days to register any appeals via email. Appeals and any supporting documentation should be emailed to alameda@homebaseccc.org.
- d. All appeal requests will be confirmed via email within one (1) business day of submission. All Applicant projects who wish to submit appeals will be subject to this deadline. There will not be a

second round of appeals.

- e. Agencies will need to provide, in writing and with supporting examples/backup documentation, specific sections of the Application on which the appeal is based, and/or sections or examples where local guidelines or regulations were violated.
- f. The appeal request must specify facts and evidence sufficient for the Appeals Panel to determine the validity of the appeal.
- g. Appealing projects will be limited to the grounds they raise when registering the appeal, and appeal grounds may only be on items/attachments that were included in the initial project Application.
- h. The NRT will review all appeals to determine if they have identified an allowable grounds for appeal. Appeals that do not identify any issues that are allowable grounds for appeals will not be heard by the Appeals Panel.
- i. Applicants will be notified of the date and time of the Appeal Panel meeting and will be invited to attend a portion of the discussion.
- j. The Panel will review all submitted appeals and back up documentation and will meet to discuss, make final recommendations, and provide responses to each appellant. The Panel will allocate up to 30 minutes for the discussion with the applicant.
- k. The Leadership Board will complete its recommendations on the final Rating and Ranking List, including results of any appeal.
- l. If the result of any appeals requires a re-ordering of the Project Priority List, the NRT and/or NOFO Committee will approve the revised list.
- m. A final Project Priority List reflective of any changes generated by appealing projects will be issued by Homebase and published on the EveryOne Home website.
- n. The Leadership Board will approve the Consolidated Application prior submittal to HUD.