



HUD FY26 CoC NOFO

Questions & Answers

Updated on June 26, 2026

Last day to submit questions to RFP@KCRHA.org: June 26, 2026

Where can I find the Information Session recordings?

The Information Session will be posted to [KCRHA's YouTube Channel](#) in 24-48 hours. To view the Slide Deck presented, [click here](#).

HUD FY26 CoC NOFO	1
Where can I find the Information Session recordings?.....	1
General Questions	1
Budgets and Match	5
HMIS.....	9
Renewals.....	10
Permanent Supportive Housing	16
Joint Component	17
Transition or YHDP Replacement.....	17
CoC Bonus (New Projects)	19
DV Questions	24
Transitional Housing Questions	27
Supportive Service Only	35



General Questions

Will there be any intention to retain permanent housing in the young adult space?

Final decisions regarding the Priority List and which projects will be renewed depend upon rating and ranking. Priorities include:

- Housing outcomes (permanent exits, low returns, stability)
- Economic self-sufficiency (income, employment, benefits)
- System gaps (serve high-need groups, fill capacity gaps, geographic dispersion)
- System balance for priority populations

What does CoC eligibility look like for those exiting incarceration?

This is dependent on the length of time they were incarcerated and the circumstances they went into prior to being incarcerated. If someone was experiencing homelessness and then was incarcerated for less than 90 days, then they would be considered literally homeless. If someone was experiencing homelessness and then were incarcerated for more than 90 days, then they are not considered literally homeless. If they spend 90 days or longer in an institution, including incarceration, then they are not considered to be legally homeless.

For programs serving disabled participants, older adults, or participants whose primary income pathway is SSDI rather than earned income, how would those participants be counted in regards to their income?

HUD is asking about earned income.

Is there any further guidance on the requirements currently blocked by the preliminary injunction? Do we know the funding ramifications if the case is ultimately decided against King County?

At this moment in time, there is King County v. Turner. This provides a preliminary injunction around specific grant terms. What is included in the FY26 NOFO that is covered by the preliminary injunction are noted in the RFP and the project application. From our stance, those elements are struck from the RFP and how it is written. That's how we are moving at this moment in time. If things change, we will update the RFP and share the news with the community.

When will this slide deck be posted?

Early next week and updated regularly.

Will you be sending out a registration link for the 6/18 renewal workshop?

This has been set out to all CoC recipients to walk through the process of renewals.



For the last CoC funding cycle, can we confirm if safe havens were a project tier 1 or tier 2?

The Priority List for FY24 can be reviewed [here](#).

Could you confirm who is on the application evaluation committee? Is it all KCRHA internal staff or CoC board members?

The rating panel will be 20-30 community members, including those with subject and lived/living experience experts in:

- Transitional Housing
- Rapid Rehousing
- Supportive Services Only
- Coordinated Entry
- Local Funding Processes

The ranking panel will be 5-10 people who will complete the development of the Priority List in line with HUD funding priorities and local system needs. This includes people with expertise and understanding of local funding, homelessness response system structure, and HUD priorities. It will also include members of the rater panel to ensure consistency with scoring process.

Is the KCRHA CoC Board planning on updating the five year plan based on HUD's new priorities?

At this time, there are no plans to change the KCRHA 5-Year Plan.

Can you describe the certification around operating a safe consumption site?

This is a requirement from HUD to determine project applicant eligibility. For more information about what HUD details, please see [page 60 of the NOFO that HUD published](#).

There are multiple questions and inconsistencies in the character limits and cutoff characters of the PDFs. What should I do?

KCRHA has [updated the applications online](#) and turned off the character limits in Adobe. Please still abide by the stated character limits.

If we apply for funds from the Fiscal Year 2025 Continuum of Care (CoC) transitional housing funds, would that preclude our organization from also receiving funds through the 2026 Seattle-King County CoC RFP?

There is no competition for FY25. HUD automatically renewed all of those contracts. If you have an FY25 award and want to renew for FY26, then you **must** apply for a renewal in the FY26 CoC competition. If you also want to apply for a new project for FY26, then you may apply for a new project with the FY26 CoC RFP.



Given the current focus on expanding housing and service capacity in Seattle and King County, are KCRHA or the Seattle Human Services Department planning to offer any matching funds to support CoC-funded projects?

Currently, there is no dedicated funding for matching new projects applying for CoC funds.

Are Supportive Housing programs (not PSH) considered Permanent housing?

Supportive Housing is not an eligible project type. The only projects consider permanent housing under this NOFO include Permanent Support Housing and Rapid Rehousing.

There is a crossed-out question, do we need to answer it?

We are not asking applicants to respond to any question or requirement under King County v. Turner.

PH that "serve families with children" need to only serve families with children?

PH that serves family with children must serve the amount of families with children indicated in the application submitted.

We have two RRH projects and were planning to submit two projects: one transition to TH and one new RRH for families (its only considered new because its no longer in consortium anymore). Is that okay?

Review the HUD funding priorities and determine what is best for your organization.

Could we confirm the due dates that providers need to be aware of? I am only aware of the July 3rd deadline for NOFO submission - were there any other major deadlines?

All applications are due July 3rd. Applicants will be informed about their application status the week of August 10th. The overall NOFO submission to HUD is August 26th.

Could we clarify what is meant by 'Supportive Service Agreements' in the Renewal Project Submission requested documents?

"Supportive Service Agreements" refers broadly to documentation that outlines the expectations, requirements, and roles of participants receiving services through the CoC project.

This can include a range of documents, such as:

- A lease agreement that includes requirements related to participation in case management or services
- A participant agreement form
- A supportive services agreement form
- Any similar documentation that describes participation expectations, responsibilities, or conditions for receiving services



In general, any document that helps define how participants engage with and receive supportive services within the project would meet this requirement.

Onsite Behavioral Health: In response to the question regarding onsite behavioral health supports, should we provide documentation for providers who offer onsite behavioral health services to our staff, or just those who provide onsite behavioral health services to project participants?

This is only in relation to the project participants.

With the overlapping timelines between the NOFOS, is there anything precluding programs from submitting an application for the same project to the YHDP RFP, the CoC Bonus RFP, or the DV Bonus RFP?

Applicants should review both and determine which one or both is best to apply for. Each funding opportunity has unique requirements, rating criteria, and application questions and will require separate applications. An organization can submit as many or as few applications as they like. Different project types cannot be combined into one application. Each project must be distinct. CoC Bonus, DV Bonus, and YHDP NOFO funds must be used separately.

Applicants may submit the same project to both the YHDP NOFO or CoC NOFO. Projects submitted to the CoC NOFO must apply for only CoC Bonus or DV Bonus funds, not both. As the YHDP process ends before the CoC NOFO, if a YHDP application is approved to be submitted in the YHDP NOFO application to HUD, the project will be removed from consideration for the CoC NOFO. KCRHA will alert an organization if this happens. Applicants that submit the same project to both the YHDP NOFO and CoC NOFO must mark on the Smartsheet form that the project has been submitted to both, and that if the project is submitted to HUD through the YHDP NOFO process, it will be removed from consideration for the CoC NOFO.

Budgets and Match

[HUD Match At-a-Glance](#)

[CoC: Effective Budget Management](#)

Do we need to show documentation for matching funds for this RFP to receive the points for matching funds?

Match funds must be detailed in the budget – final documentation is not required at this stage.

For Rapid Rehousing projects, is the Itemize-Rent budget worksheet in the budget template (organized by unit size, Fair Market Rent, and 12 months of rental assistance) intended primarily as a budgeting methodology, or does it reflect an expectation that



projects provide rental assistance generally at those levels? If an organization provides flexible, individualized rental assistance with varying durations and braided funding sources, does this model of rental assistance distribution fit with this RFP, and if so, how should it be reflected in the budget template?

The budget template is structured to align with how budgets are entered in e-snaps. KCRHA recognizes that the actual budgeting approach for Rapid Rehousing (RRH) projects may not precisely match the format or assumptions reflected in the template.

The itemized rent worksheet (organized by unit size, Fair Market Rent, and 12 months of assistance) is intended primarily as a standardized budgeting framework rather than a prescriptive expectation that all projects provide rental assistance at those specific levels or durations.

Projects that use flexible, individualized rental assistance - including varying subsidy amounts, durations, and braided funding sources - are still consistent with the intent of this RFP.

Regarding admin costs in the budget, should that be 5% of the award money or 5% of SSO+RENTAL(where applicable)?

The 5% administrative rate is automatically calculated based on the total of all requested budget line items, including Supportive Services, Rental Assistance, Leasing, Operations, and other eligible costs.

This means it is not limited to 5% of only SSO and Rental Assistance, but rather applies to the overall requested project budget as entered in the template.

Our business operates under our non-profit umbrella and part of the cost of providing mission services is covered by manufacturing revenue. I want to clarify that this earned revenue qualifies as an eligible Cash Match source under the CoC guidelines? And, is there anything specific we need to consider in using the business revenue as our match?

Please review the HUD rules on [Program Income](#).

Program income.(a) *Defined.* Program income is the income received by the recipient or subrecipient directly generated by a grant-supported activity.(b) *Use.* Program income earned during the grant term shall be retained by the recipient, and added to funds committed to the project by HUD and the recipient, used for eligible activities in accordance with the requirements of this part. Costs incident to the generation of program income may be deducted from gross income to calculate program income, provided that the costs have not been charged to grant funds.(c) *Rent and occupancy charges.* Rents and occupancy charges collected from program



participants are program income. In addition, rents and occupancy charges collected from residents of transitional housing may be reserved, in whole or in part, to assist the residents from whom they are collected to move to permanent housing.

Regarding braided funding, if the organization has verified external funding sources, but they are flexible and not specifically tied to housing stability or behavioral health services, is the organization able to receive credit?

The intent is for your organization is to look at the other funds that are supporting the application you're putting forward. If it's just funding that your organization gets rich writ large, that's different than the funding for this specific project. We really want to know about all the other fund sources connected to this specific project you are applying for CoC funding.

Is there an organizational cap that we can apply for in terms of \$?

Any renewal, all come out of the \$66million ARD. There is no cap on an organization, but per the NOFO no single project can be more than \$15million.

For the 25% match requirement on RRH projects - is the 25% applied to the full project budget or the budget less rental assistance?

25% match is required for the entire budget. Leasing dollars are the only type not for any project type.

Braided Funding:

Should documentation of other public funding only be provided for dollars committed for CY 2027, or would it still be helpful to provide documentation of other current public funding?

For example, we have a current contract which should be renewed through 2027 pending local budgets, etc. but our current award letter only documents the commitment in 2026 – we will not receive an award letter for 2027 until after local budget season this fall. Would it still be helpful to submit our current award documentation?

If we should provide documentation of current funding committed, can we provide award letters/commitments from KCRHA? For example, State CHG dollars sub-granted through the RHA?

If we have documentation of committed public funding that partially supports our project, should this be included to address the request for documentation of braided funding? For example, an OH investment for our entire housing campus, which would benefit our CoC-funded project but also supports other non-CoC projects on our campus.

Yes, we would like information about CY2027 funding, including both confirmed and pending sources. If 2027 awards are not yet finalized, it is still helpful to include documentation that



shows anticipated continuation (e.g., current award letters with explanation of expected renewal).

Funds specifically dedicated to the CoC project are preferred, as they most clearly demonstrate project-level support.

- Providing current funding documentation:
Yes, please include current award letters even if they only document 2026 funding, especially if they support an expected continuation into 2027.
- Including KCRHA-issued funding (e.g., CHG dollars):
Yes, award letters or commitments for other public funding administered through KCRHA may be included.
- Including partially supportive or broader funding (e.g., campus-level investments):
Yes, documentation of braided funding that partially supports the project can be included. However, to the extent possible, prioritize or clearly identify the portion that benefits the CoC-funded project.

Including both dedicated and contextual funding information provides a fuller picture of project sustainability.

Regarding Q14 - Braided Funding: It asks: "Has the project secured or committed external funding that leverages housing and/or behavioral health resources. if yes: Include and attach at least one of the following Award letter(s) from WSHFC, PHA, OH, or DCHS" Would they want letters/contracts verifying funding into Calendar Year 2027? -It lists WSHFC and not, say, WA Dept of Commerce; would CoC funding not be credible for some reason I'm missing?

Any braided funding from any local gov, and anything to indicate other funding is dedicated to it in 2027.

Can you speak to acceptable ways to document braided funding? Would a notice of award or similar commitment letter of current funds work?

Yes, that would work.

If a renewal project wants to reduce the budget, what do we need to do?

Renewals seeking to reduce their current budgets should submit an updated [CoC Budget Template](#) with the detailed information.

Just confirming that for renewal applications with the transition attestation ticked, a budget attachment is not required because a budget is only required for new projects.

An [updated budget](#) is required for a transition grant. If your renewal attests to transition and ends up needing to transition, then KCRHA will request an [updated budget](#).



If we are a renewal application requesting the same budget amount as the previous year, do we need to complete a CoC budget template?

A renewal does not need to submit a CoC Budget Template unless the project is electing to reduce the budget.

The link for the renewal budget sheet takes me to one labeled for "new projects" which is the same as the one for transition projects. The template does not work for RRH as it only has a rent tab with pre-filled formulas to pay full rent. It also is missing RA personnel details. Are you able to upload a template that can be used for RRH renewal/new projects?

For renewals, if there is no budget change, then you do not need to submit a budget. If you are reducing your budget, then the submission must follow the template, including the rental assistance calculation, as that is how we input to HUD.

I wanted to reach out for another quick question on the CoC Renewal for Mi Casa. If we are a renewal application requesting the same budget amount as the previous year, do we need to complete a CoC budget template? Just want to confirm!

A renewal that is not reducing their budget does not need to submit a CoC budget template.

The FY26 CoC Budget Template for New Projects automatically calculates Admin at 5%. Per 24 CFR 578.59, Admin can total 10% of the total CoC Program Costs. Why is the budget template set at 5% instead of 10%? Is it due to splitting the admin between the grantee and subrecipient? If so, how is the total project cost (inclusive of the other 5% for Admin) accounted for in the local application process?

The 5% cap is due to splitting the admin between the direct grantee and subrecipient. If you are intending to be the direct recipient, please reach out to KCRHA directly and we can provide a budget template without the 5% cap.

For federal fiscal year 2026 there are no local budget commitments made yet, and so how do we secure a 25% match commitment for the grant period?

Can we use current allocations on the assumption that they will be continued?

KCRHA is aware that funds for 2027 are not known to be dedicated. Applicants may use current funding commitments as a reasonable basis for demonstrating the required 25% match for the grant period. This approach assumes that these resources are likely to continue, although final funding decisions have not yet been made.

Applicants should identify and document any existing allocations or funding sources that could support the proposed project at this time, even if those commitments are not yet formally dedicated for the full grant period.



HMIS

Does my organization have to engage with HMIS?

If a project, no matter the project type, is funded in this process, engagement in HMIS and coordinated entry will be required.

Does an organization need to currently be using HMIS when the application is submitted?

No, you do not need to be using HMIS when the application is submitted. That will not preclude you from applying to this opportunity. By the time you are granted the award and starting the program, you would need to be utilizing HMIS.

Given that HMIS is required for this project and that there is a budget template provided for including HMIS costs, would you be able to direct me to where I could find the information on:

1. The HMIS participation fee, and
2. The cost and duration of HMIS trainings.

A list of eligible costs for the HMIS budget-line-item is available [here](#).

Currently, there is no required HMIS participation fee. An organization may have costs related to staff time to enter information into the database.

HMIS training is conducted by BitFocus, the HMIS vendor for Seattle-King County. There is no cost to attend those trainings. All trainings can be found [here](#).

Is direct HMIS access required for a subcontracted housing provider if the City is responsible for maintaining all HMIS records?

Yes, the subcontracted provider should have direct HMIS access as they would also be responsible for data entry and completion. The operator should be the party completing the data entry to ensure accuracy.

What is the period of performance for HMIS program outcomes?

April 1, 2025-March 31, 2026 for renewing and transition grants that have rating related to HMIS data and information.

Renewals

If we want to expand an existing project, should we apply via the renewal application? Or how would we do that?

If a currently funded CoC project seeks to expand, you must submit both a renewal and a new project application. You can indicate in the project name that it is an expansion of an existing project.



If we want to retain our rapid rehousing program and change the target audience to families, should that be a renewal or a transition grant?

This can be completed as a renewal application.

Can we complete multiple applications (a renewal AND a transition grant) for the same project?

There is a Transition Grant Attestation in the renewal application that would indicate your project would seek to transition if the renewal falls into Tier 1, this is to decrease the need to submit both application types.

Can you confirm whether any of our programs have been monitored by HUD since 1/1/2022?

A renewal will likely know if they have been monitored by HUD. If not, please reach out and KCRHA will respond directly to you.

Can you explain what "nearing goal" means on the points available for exits to permanent housing? What is the percentage threshold that would give a program 5 points rather than 0 points?

51%-84% for rapid rehousing. Please see the rating metric table for the high and low targets for each project type.

Can you confirm that KCRHA will be using HMIS data from 4/1/25-3/31/26 for scoring purposes?

Yes, that is the date range.

Confirming – regarding renewal for RRH, they will be deprioritized but rental assistance is allowable for RRH.

Correct.

For renewals projects where doing a reallocation, there is an additional requirement of submitting an updated budget

Yes, and if wanting to reduced budget, we will ask for an updated budget. For a renewals, that budget can come after the updated.

Would a renewal that decreases their budget be more competitive?

That is not a part of the rating & ranking consideration

Q 4 under “monitoring and agency audit” – “has this program been monitored by HUD since 1/1/22” – should we only answer this about direct HUD monitoring, or also about KCRHA monitoring?

HUD monitoring only. If unsure, please reach out to KCRHA



Regarding Q14 - Braided Funding: It asks: "Has the project secured or committed external funding that leverages housing and/or behavioral health resources. if yes: Include and attach at least one of the following Award letter(s) from WSHFC, PHA, OH, or DCHS" Would they want letters/contracts verifying funding into Calendar Year 2027? -It lists WSHFC and not, say, WA Dept of Commerce; would CoC funding not be credible for some reason I'm missing?

Any braided funding from any local gov, and anything to indicate other funding is dedicated to it in 2027.

Can you speak to acceptable ways to document braided funding? Would a notice of award or similar commitment letter of current funds work?

Yes, that would work.

If an agency is applying for a renewal + expansion AND a new project - if the renewal does not make Tier 1, can we transition it to the new project?

No, that would not be a transition grant.

It was stated that the PDF character limits in the application form had been removed but that we should still adhere to the character limits listed in the application.

Character limits were not listed in the renewal application. Please use your discretion to keep responses clear and succinct.

We are currently funded through the CoC as part of a Consortium but don't see any mention of Consortiums in the FY26 NOFO – will HUD continue to fund Consortium models under the FY26 NOFO?

This is a consolidated grant, simply meaning there are multiple subrecipients working to meet the requirements of the grant. Projects may still have multiple subrecipients working together to meet the goals of a project.

If the Consortium model will continue and an organization from our Consortium transitions to a new model, would this org leave the Consortium?

Because the Consortium is structured as a single consolidated grant, organizations do not formally "leave" the Consortium if they transition to a different model.

If a subrecipient chooses to transition their project, the portion of funding associated with that project will be removed from the original Consortium award. The rest of the Consortium grant and participating organizations remain unchanged.



KCRHA will track all transitions and renewals to ensure that the total funding across all awards does not exceed the FY25 award amounts available for renewal.

If one or more organization(s) leaves the Consortium, does the Consortium model end? If so, how and by whom would we be notified?

No, the model does not automatically end if one or more organizations transition out of it. Because the Consortium is a single consolidated grant, individual organizations are not considered to “leave” in a way that dissolves the overall structure.

If a subrecipient transitions their project, the funding tied to that specific project will be removed from the consolidated award, but the remaining project and its other partners may continue. KCRHA will track all transitions and renewals to ensure that total funding does not exceed the FY25 award amounts available for renewal. If there are any broader structural changes that would affect the consolidated grant itself, KCRHA would communicate those changes directly to impacted partners through formal channels.

If you have questions about how a potential transition may affect your organization or the consolidated, and/or if you wish to coordinate with other partners, please reach out to your partners and KCRHA for discussion and alignment.

Attestations: Are we required to say “Yes” in response to either or both attestations regarding budget reduction and transition grants in order to submit a renewal application?

No, neither attestation is required.

In looking at renewal and transition applications, would KCRHA like us to list our “amount requested” as the award amount that will expire in calendar year 2027? For example, we have one award that runs on the calendar year. Our current award (1.1.26-12.31.26) is for \$128,298, however, our Notice of Award for next year (1.1.27-12.31.27) is for \$135,698. I am wondering if we should list the CY26 or CY27 figure for amount requested.

Please use the FY25 award amount. If you are not sure what this is, please reach out to KCRHA.

For the 'MOUs, Contracts, and Letters of Commitment' in the Renewal Project Submission requested documents - is this specific to the CoC project or can something agency wide be submitted?

This is specific to the CoC project.

If the Consortium model ends, would the remaining Consortium members then need to apply as new individual projects, or would they still apply as renewals?



At this time, the Consortium model is not automatically dissolved when organizations transition out. Because it is a single consolidated grant, the remaining structure continues unless KCRHA makes a broader programmatic change.

If the Consortium model were to end in the future, KCRHA would provide formal guidance on next steps. This would include clear instructions on whether remaining organizations should apply as individual renewal projects or as new projects. Until such direction is issued, projects should proceed under the assumption that the Consortium structure remains in place and renewals continue accordingly.

If the Consortium remains even after one or more of the organization(s) exit(s), would all Consortium members still be rated/ranked based on past performance of all Consortium members?

Because the Consortium operates as a single consolidated grant, performance is generally considered at the grant level rather than solely at the individual subrecipient level. This means that rating and ranking are likely to reflect the overall performance of the Consortium as a whole. However, KCRHA will continue to monitor both Consortium-wide outcomes and individual project transitions (e.g., changes in funding tied to specific subrecipients) to ensure compliance with renewal and funding requirements.

If we will be rated/ranked based on the entire Consortium's performance, can KCRHA share information on project spenddown and performance within the Consortium over the past two years?

Information on spenddown and performance may be shared through standard reporting, monitoring, or communication channels, consistent with data-sharing practices and requirements. If you need specific data or analysis related to past performance within the Consortium, you are encouraged to reach out directly to KCRHA.

You may also wish to coordinate with your Consortium partners to better understand collective performance and align on any potential transitions or renewal strategies.

If a grant was originally awarded as a partnership with another agency and later amended to remove the partnership aspect. In these circumstances, would we be able to file a renewal that is a standalone application? In other words, will a renewal revert to include a defunct partnership?

A grant with multiple subrecipients may apply as a standalone application – if all subrecipient apply to renew then the grant will be submitted as a continued consolidation. The request



cannot exceed the FY25 amount for a standalone project. Please reach out to grant partners if you wish to coordinate.

If a renewal project wants to reduce the budget, what do we need to do?

Renewals seeking to reduce their current budgets should submit an updated [CoC Budget Template](#) with the detailed information.

Just confirming that for renewal applications with the transition attestation ticked, a budget attachment is not required because a budget is only required for new projects.

An [updated budget](#) is required for a transition grant. If your renewal attests to transition and ends up needing to transition, then KCRHA will request an [updated budget](#).

Regarding this question “Are there any open HUD or KCRHA monitoring findings or recommendations related to this CoC Program project or other HUD or KCRHA funded projects within your Agency?” Can you explain what you mean by “open”?

An open finding or recommendation means your agency is still working to close or remedy the finding or recommendation from monitoring.

If we are a renewal application requesting the same budget amount as the previous year, do we need to complete a CoC budget template?

A renewal does not need to submit a CoC Budget Template unless the project is electing to reduce the budget.

The link for the renewal budget sheet takes me to one labeled for "new projects" which is the same as the one for transition projects. The template does not work for RRH as it only has a rent tab with pre-filled formulas to pay full rent. It also is missing RA personnel details. Are you able to upload a template that can be used for RRH renewal/new projects?

For renewals, if there is no budget change, then you do not need to submit a budget. If you are reducing your budget, then the submission must follow the template, including the rental assistance calculation, as that is how we input to HUD.

I wanted to reach out for another quick question on the CoC Renewal for Mi Casa. If we are a renewal application requesting the same budget amount as the previous year, do we need to complete a CoC budget template? Just want to confirm!

A renewal that is not reducing their budget does not need to submit a CoC budget template.

Permanent Supportive Housing

A question on the priority for Permanent Supportive Housing projects serving families with children: If a project serves both families with children and single young adults,



would it be prioritized as a project serving families with children?

It is up to the applicant around how you want to submit that application regarding the populations that you are working with.

Is Tier One going to contain all our community's Permanent Supportive Housing Projects that want to renew?

Yes, a community goal is to ensure we are preserving funding for permanent housing projects within our tier one that are high ranking and high performing.

I have a question regarding Section 1 question 3. **"3. Required: Does the project affirm to only serve populations meeting the definition of "homeless" in 24 CFR 578.3, including the definition of "homeless" under section 103(b) of the McKinney- Vento Homeless Assistance Act".** Our renewal projects are dedicated to serve "chronically homeless" persons. That definition includes people residing in Safe Havens. The definition of "homeless" does not include people residing in Safe Havens. I am concerned that this affirmation will exclude those individuals - should we select 'no' to meet the definition of "chronically homeless"?

[24 CFR 578.3 "Chronically homeless" under 1.ii states](#), "Lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and." Therefore those in a safe haven would be included in the cited definitions.

[On page 42 of the NOFO](#) it states, "Participants eligible to be served by projects funded under this NOFO, are as follows: a. PH-PSH projects awarded CoC funds must serve one of the following: (1) persons who qualify as homeless under paragraphs (1), (2), or (4) of 24 CFR 578.3 **or** Section 103(b) of the McKinney-Vento Homeless Assistance Act where the head of household also has a qualifying disability as defined section 401(9) of the McKinney-Vento Homeless Assistance Act;" emphasis added. This "or" indicates that both definitions may be used. Since the 24 CFR 578.3 includes those in a safe haven, your project should not be prohibited from serving those in a safe haven.

Joint Component

For joint programs: would they apply solely as joint programs? Or could they apply as Transitional Housing and Rapid Rehousing separately? What about renewals?

HUD is not seeking new applications for Joint Component Projects. Those are projects combining Transitional Housing and Rapid Rehousing into one. If an organization is interested in providing both of those types of services, they would need to be separate projects and separate applications. Both would have to participate in coordinated entry and receive referrals through coordinated entry. Unlike a joint component, you cannot move people between the two, so they would have to be separate projects operating independent of one another.



If a Joint Component program applies as Joint Component, is there a back-up option to be considered as a transition grant to TH if not prioritized in Tier 1?

In the renewal application there is a transition grant attestation to affirm that a project applying as a renewal would consent to being a transition grant should it fall into Tier 2. Should this occur, the project will be contacted about next steps. Renewals may be handled in a different way. All applicants who are renewing to review HUD's funding priorities and how your project may or may not align with HUD's funding priorities as outlined in the NOFO.

What about *existing* Joint Component programs? Do they also need to apply as two different projects?

All renewals are encouraged to closely review the HUD funding priorities to determine how to best address a current project.

Transition or YHDP Replacement

For transition/replacement projects: In the scoring criteria it references HMIS outcomes. Does this mean the performance of the prior project type impacts the score of the new project type?

Yes. This does impact the Transition Grant. It's used to determine how the project and organization has been performing.

If RRH applies as renewal, could their back-up be to transition to TH (master lease, most likely) if not in Tier 1?

In the renewal application there is a transition grant attestation to affirm that a project applying as a renewal would consent to being a transition grant should it fall into Tier 2. Should this occur, the project will be contacted about next steps.

If a project is a transition, would these be considered new projects or renewals?

A transition grant is considered a new project.

I see on the renewal application that there is a caveat that would allow KCRHA to submit the project as a transition grant if it is ranked too low to be a renewal grant. If we agree to this, can we control the type of project we transition to? (SSO vs. transitional housing, etc.)

Yes, if the occurs, KCRHA will connect with the project to coordinate.

We have an existing project with a joint component, but we're dropping the joint component. Can we keep the total budget the same and reallocate the dollars that were used for the joint component in prior years?



Please carefully review your budget and spending over the two prior grant years to determine the budget. Projects with more than 10% underspend are encouraged to consider a budget reduction to ensure effective use of funds.

In the transition application, the last question is a table that asks when specific milestones will occur. Does this refer to when we transition to the new model?

The milestones are related to the new project type milestones – hiring of staff, fully leasing up, etc. Please use that timeline for the milestone dates.

Is a reallocation different than a transition project?

A reallocation is when we take existing funding and move it to another project - They can be for a transition grant, or new project. A transition involves changing project type from one to another with reallocated funds.

If a transition grant is considered a new project, would this type of reallocation be considered within the same prioritization as a new project?

Transition grants are considered new projects by HUD and will be reviewed with the same thresholds by HUD.

If a current DV Joint Component project decides to apply as renewal with an attestation to transition grant, can their attestation be to apply to two different projects: new TH and new RRH?

The transition is limited to TH or SSO.

For scoring purposes on transition projects - will the program component priority be based on the current project or the project type we are transitioning to?

That is based on the project type you transition to.

I have a question about the attestation of "Regarding Potential Transition Grant". If an applicant chooses 'no' for this, can you confirm that the application will still be considered part of the local application and ranked but removed/replaced from the application to HUD?

If an application chooses 'no' in relation to the transition grant attestation, then it will not be considered for a transition. If the renewal falls into Tier 2 it may still be put forward if it passes all threshold requirements. A project that does not meet threshold requirements may be removed.

CoC Bonus (New Projects)

We offer legal services that can feed into other programs, though it's not part of a larger project. Is that considered an allowable cost?



Carefully review the RFP and the sought after program types in line with HUD priorities and how a project, no matter what service or services they are aiming to provide, may or may not meet the focused HUD priorities that are inclusive of enhancing self-sufficiency, (i.e. connections to employment, connections to behavioral health supports, etc.). That will help you determine how any individual project or projects meets the requirements of the HUD priorities and funding priorities.

When would be the best time for us to check to have the most comprehensive picture of what we're signing up for before July 3?

If you submit a question around the type of project, we can put together in the Q&A a list of what required documentation and what required reporting. We'll aim to get that on in the Q&A with it by likely by the end of this week.

Is an organization with a master service agreement with KCRHA is pre-qualified?

No, that does not necessarily pre-qualify an organization for a new project. You will still have to go through the due diligence review and financial review.

Help me understand more about what the reporting requirements are. Do you have a sense of what are we signing up for in terms of the reporting requirements?

Section D in the NOFO starting on page 110 outlines some of the reporting that may be required. Key reports for subrecipients to think about are the annual performance report. This describes to HUD how the program is operating and performing, based upon HUD HMIS data and information. We will link to the APR information in the Q&A. There may also be some financial reporting that needs to be done. This largely may be done through KCRHA, where we will request a sample of invoices and a snapshot of invoices and financial management. We will put some of those things together for a kind of clearer idea of what that may look like so that you have a fuller picture.

- [HUD FY 2026 CoC NOFO](#)
- [HMIS APR Reporting Program Specifications](#)
- [CoC Program HMIS Manual](#)

How can I determine if my organization should apply for a new youth project under this NOFO or the newly released YHDP?

Review both and determine which one or both is best for you to apply for.

Is the award of the expansion dependent on the award of the renewal?

If a renewal is not put forward in the priority list, an expansion likely would not be put forward. When HUD reviews the application, they would not likely fund and expand a project they are not renewing.



How is the 50% metric defined? Is it 50% of all enrolled participants or 50% of participants that exit?

That metric is regarding 50% of those who exit the project.

Our organization provides “Emergency Rent Assistance” of \$400 for an individual or \$600 for a family that is at least one month behind in rent. We have helped many families avoid homelessness after an unexpected expense or job loss. The CoC Bonus Grant appears to be focused exclusively on helping people who are homeless. Would our Emergency Rent Assistance program qualify for this grant?

No, emergency rent assistance is not an allowed cost or project type **under** this NOFO.

If this is the case/programs decide to apply to KCRAH/HUD CoC as exclusively serving families with children, can they use *other* fund sources to support households without children in the same program?

The new project application asks only about the proposed services and population to be served with CoC funds.

In the [RFP for new projects](#), I am seeing the following language: “The total amount of funds available for the Fiscal Year (FY) 2026 CoC Bonus RFP is up to \$5,000,000 annually. The final amount available for this RFP will be determined by HUD’s final award amount to the Seattle-King County CoC for FY26.”

- Does the \$5 million annual cap apply per proposed project?
- Can you please clarify whether or not this \$5 million cap applies to new SSO projects?

The \$5M is the total amount of new funds that may be applied for, for the entire Seattle-King County CoC. KCRHA intends to fund multiple projects from the \$5M of new funding.

For our new projects we are applying for, we lack the demographic information requested in supplemental questions 8 and 9. Should we estimate those numbers or put N/A?

Please include your best estimate.

I'm wondering if I'm missing a part of the application where we describe the meat of what we're proposing. Is there a place I'm missing where we describe the programs we're proposing?

Question 1 asks “Describe the proposed project and how it will address an identified geographic or system gap (accessing services, strengthening crisis response, and improving housing stability) as documented in the FY26 CoC System & Geographic Gaps for New Project Priorities.” Please include details in your response to question 1.



If we are applying to expand a direct grant with HUD - will the whole thing remain a direct grant or will it move under KCRHA?

KCRHA will coordinate with you to ensure you remain the direct grantee.

We are reviewing the KCRHA NOFO and have a question regarding applicant eligibility. Based on the minimum eligibility requirements outlined in the NOFO, it appears that eligibility is limited to the specified entity types mentioned below. However, HUD Continuum of Care (CoC) program rules often allow local governments to serve as applicants under certain circumstances. Could you please clarify whether the City of SeaTac, as a local government entity, is eligible to apply directly under this funding opportunity? If the City is not eligible to apply as the primary applicant, would KCRHA allow a partnership structure in which the City serves as the lead partner and pass the grant fund to the service provider?

Yes, a city government is eligible to be an applicant and a direct applicant. All applicants must still apply in the RFP process for the Local Competition per HUD rules. If the project is accepted through rating and ranking, then KCRHA as the Collaborative Applicant, will work with you on completing the official project application in HUD's portal – e-snaps.

In reviewing the smartsheet form for "New Project Applications" we noted that there is a request for the following under "requested application documents":

"Data on program outcomes

- Returns to Homelessness
- Exits to Permanent Housing
- Exists with Earned Income"

Could we receive clarification what kind of attachment/documentation KCRHA is requesting we submit to fulfil this requirement?

KCRHA would like HMIS data – either from an Annual Performance Report or HMIS Program Outcomes. If you do not have HMIS access, then data or a report from another agency system is acceptable. If you do not have a report that can be generated, please cite how you were able to calculate the requested outcomes.

The FY26 CoC Budget Template for New Projects automatically calculates Admin at 5%. Per 24 CFR 578.59, Admin can total 10% of the total CoC Program Costs. Why is the budget template set at 5% instead of 10%? Is it due to splitting the admin between the grantee and subrecipient? If so, how is the total project cost (inclusive of the other 5% for Admin) accounted for in the local application process?



The 5% cap is due to splitting the admin between the direct grantee and subrecipient. If you are intending to be the direct recipient, please reach out to KCRHA directly and we can provide a budget template without the 5% cap.

In response to question #8 under Mainstream Benefits Supports, can you share a bit more about what is meant by the “partners listed in question 7”? Does this mean you only want to see formal agreements directly with SOAR, SSI/SSDI, SNAPs, and Medicaid/Medicare? Or do you also want to see agreements that demonstrate partnerships with DSHS, who administers programs like SNAP and Medicare, or with providers who offer assistance with benefits navigation?

Partnerships with organizations that administer these programs, as well as those with demonstrated expertise in helping individuals apply for or navigate benefits associated with the listed programs, are all acceptable. This can include formal or informal agreements with agencies such as DSHS, as well as providers that specialize in benefits navigation or application support.

Can you please clarify if spaces count toward the application character limit?

No, spaces do not need to be counted in the character limits.

Can you please provide guidance for how local governments can fulfill the requirement to submit current fiscal year's financial statements? Given the complexity of our financial statements, is there any streamlined information that is allowable for governments?

Due to the complexity and scale of local government financial statements, local governments may submit the URL to the Washington State Auditor's Office Audit Reports website. The information is public and the size reports is expected to be larger than what can be submitted via Smartsheet.

Is this CoC Bonus funding for entirely new projects, or should we be applying to this as a renewal for our existing contract?

The CoC Bonus is only for new projects.

The COC application asks for a LOT of attachments and the smart sheet appears to be capped at 10 attachments. Can that be increased? I'm in the middle of the form and hoping I don't have to start over.

Unfortunately, KCRHA cannot change the cap - you can zip files or do a second submission with the additional attachments. Sorry we cannot change that!

We have a project that has been running at a financial deficit for many years and is at risk of closing.



It meets all of the criteria as noted below and is the only one of it's kind in the state of Washington at this time.

The program supports 15 families, women who are coming out of SUD inpatient rehabilitation and being re-united with their children.

The program is designed to do the following.

- Promote self-sufficiency, employment, recovery
- Results based approach to reducing homelessness
- Transitional housing / supportive services only
- BH care and wrap around services
- Partner with workforce, employers, childcare providers
- Collaborating with community partners
- Promote trauma informed & person-centered care especially for survivors of violence
- Sub-population gaps – families
- Integrated BH and SUD
- Provide life skills training.

It is not a renewal as it does not receive any funding of this kind at this time but has been operating for a number of years.

I have two questions -

Q #1 – I have started the application but the first question on the smartsheet is “Please select which CofC funding opportunity you are applying for” and the only choices are “CofC Bonus” and “DV Bonus”. This would (I think) be referred to as a “new project” and does not fit either category.

If you are serving 100% DV population, then select DV Bonus. If this program is not serving 100% DV population, then select CoC Bonus.

Q #2 – We have completed the budget work. On the itemized HMIS worksheet the “Cash Match” is being pulled from the other worksheets and is reflected but “In Kind” is duplicating the “Cash Match” cell and doubling the “match”. Is this correct?

Thank you for noting this error, the formula has been updated and should properly calculate.

Please use the updated link here: https://kcrha.org/wp-content/uploads/2026/06/FY26-CoC-Budget-Template-for-New-Projects-UPDATED_062626.xlsx

DV Questions

Will RRH programs that serve both DV and families be prioritized?

Per the HUD FY26 CoC NOFO, there is funding set-aside for DV projects and permanent housing projects for families with children. The final Priority List may reflect the HUD funding priorities in line with local system needs.



Will DV RRH Programs be prioritized in Tier 1 above other RRH programs?

Tiering will be based on the final score from data and the local applications. Rankers may move projects based on the following priorities:

- Housing outcomes (permanent exits, low returns, stability)
- Economic self-sufficiency (income, employment, benefits)
- System gaps (serve high-need groups, fill capacity gaps, geographic dispersion)
- System balance for priority populations

Within DV Bonus Funds: Is there a prioritization order for DV Coordinated Entry, THP, SSO, RRH, New Projects, Expansion projects, Renewing projects?

There is no set prioritization within available DV Bonus funds.

Regarding DV SSO, in the past, DV CE has been the only one, are new DV SSO programs eligible in this NOFO?

This is not an eligible component in the local competition. Eligible new projects for the DV Bonus include transitional housing and rapid rehousing for families.

HUD designated \$104M for DV Bonus (across entire HUD NOFO). Is there an expected increase in DV Bonus funds locally? If so, is there an estimate?

As of June 11, 2026, HUD has not released the available DV Bonus amounts. Based on prior years, this amount may be around \$3.5 million.

Are programs that are serving those who are fleeing or attempting to flee DV only eligible for the DV Bonus?

No, your organization does not have to only apply for the DV Bonus. It's up to the program to decide which opportunity to apply for. The DV Bonus is only available for a program serving 100% of your population fleeing DV, sexual assault, stalking, or sex trafficking. Projects funded under this opportunity must serve those who meet HUD's definition of homeless under category one, literal homeless, or category four, fleeing or attempting to flee DV.

Is the DV Bonus only for Transitional Housing or Rapid Rehousing?

The DV Bonus is only for Transitional Housing and Rapid Rehousing for families with children. This is in line with the priority that HUD has set for permanent housing for families with children. At this moment in time, there is no set prioritization of a new project versus a renewal project. Ranking will be based upon their rating and performance outcomes, as well as how that project details how they will meet specific system performance measures.

Would programs that serve an overlapping population of DV survivors and families be prioritized over programs that serve one of those populations?



At this moment, the questions we are asking around population is around 100% of that population. It's up to the program how you want to present that in your application.

If a project that was not funded by the DV Bonus in the past, would it be considered a new project if applying to DV Bonus?

If a project currently has CoC funding and wants to apply for new DV funding, the entire project would need to be serving DV populations. The CoC funds and DV Bonus cannot be combined. If a project that has never received CoC funding is applying for CoC funding, that's a different scenario.

If a DV program (eligible for DV Bonus) applies to the main CoC funds (not DV Bonus) could they be placed in Tier 1?

Fund type does not impact what Tier a project may fall into.

If a program does this and is not placed in Tier 1, would this program be considered for DV Bonus equally? Or would programs who applied directly to DV Bonus be considered first, followed by programs who did not? I.e. Is there a downside for a DV program to apply directly to CoC (not DV Bonus)? Would projects that apply to DV Bonus be considered in the main CoC (i.e. if all DV Bonus is allocated)?

Fund type does not determine Tier placement. A project that applies under CoC Bonus and commits to serving 100% DV survivors may be funded with DV Bonus funds if CoC Bonus funding is insufficient and the project scores highly. Likewise, a DV Bonus project that scores well may receive CoC Bonus funding if DV Bonus funds are limited and CoC Bonus funds remain available.

Previously DV-CE was funded with DV Bonus funds, but in the presentation today, the only project types were TH and RRH. Will DV CE be funded using DV Bonus, or will it be in the same renewal project under regular CoC?

Expansion of the CE-DV grant is not permitted under the RFP for DV Bonus for this year based on system needs. This project will be a renewal, not a new project and would not apply as a DV Bonus new project.

What types of projects are eligible to apply for the CoC DV New Projects? Transitional Housing, Rapid Rehousing only?

New Transitional Housing and Rapid Housing for families with children are eligible project types under the DV Bonus RFP.

Is it possible to submit an application for a new DV project that is Supportive Services only?

No, that is not an eligible project type under the DV Bonus NOFO.



The FAQ states TH and RRH must be separate projects and separate applications. Does the FY26 DV Bonus competition permit an organization to submit both a Transitional Housing application and a Rapid Rehousing application?

An organization can submit as many or as few applications as they like. Different project types cannot be combined into one application. Each project must be distinct.

If a program applies for DV Bonus, but all the DV Bonus funds are allocated, would this program be considered for general CoC funds?

If there are available funds, a project may be moved to another funding bucket if it is highly rated.

Regarding, "Is the DV Bonus only for Transitional Housing or Rapid Rehousing? The DV Bonus is only for Transitional Housing and Rapid Rehousing for families with children. This is in line with the priority that HUD has set for permanent housing for families with children."

To clarify, are you saying that ALL RRH, including RRH for DV survivors, must exclusively serve families with children?

HUD funding priority is for permanent housing for families with children. There is not specification beyond this.

Is the only PH eligible to apply PH for families with children? Or is this specific to DV Bonus funds?

The RFPs for both CoC Bonus and DV Bonus specific prioritized projects and populations. HUD's funding priority related to permanent housing is permanent for families with children.

Can we serve single survivors without children with these funds?

Projects may elect to serve any eligible population; HUD is prioritizing funding for permanent housing projects for families with children.

Can DV programs be renewed using DV Bonus funds?

DV bonus funds are for new projects only. CoC Bonus and DV Bonus must be used separately.

Are the DV bonus funds (likely \$3.5-\$5M) on top of the \$66M ARD?

DV bonus funds are separate, and are for new projects only.

Transitional Housing Questions

[Leasing At A Glance](#)

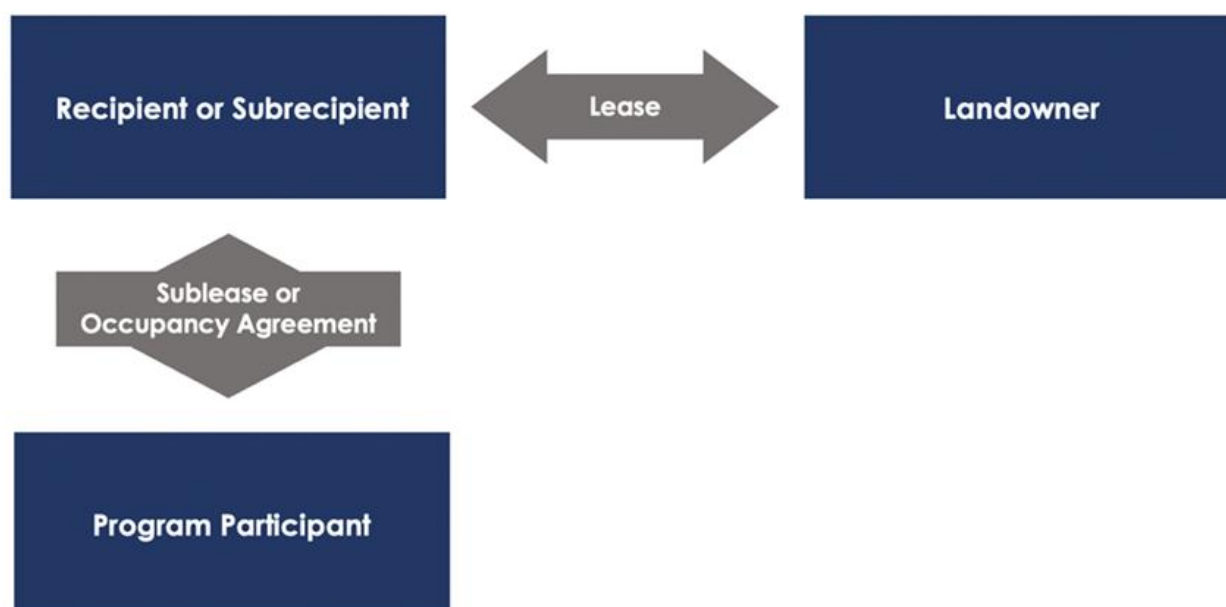
If the transitional housing program uses leasing funds, who is the lease holder?



In a project that supports housing costs with leasing, the lease is between the CoC recipient or subrecipient and the landowner. Once a program participant is identified for the unit, the recipient or subrecipient then executes a sublease or an occupancy agreement with participant ([§ 578.77\(a\)](#)).

- In Transitional Housing projects the sublease or occupancy agreement must be for a term of at least one month and be automatically renewable upon expiration (for a maximum term of 24 months).

[Image](#): Relationship between a landowner, recipient/subrecipient and the program participant.



[Lease overview](#) and [lease and sublease overview](#).

Can leasing funds for a transitional housing project be used to master-lease a hotel/motel?

Yes, leasing funds can be used to master-lease hotel/motel units as long as the terms align with the occupancy agreement/sublease agreement for transitional housing:

Participants in a TH project must have a signed lease, sublease, or occupancy agreement with the [following requirements](#):

- An initial term of at least one month
- Automatically renewable upon expiration, except by prior notice by either party
- A maximum term of 24 months



I am a recipient of funds for transitional housing under the CoC Program. What effect does the language in the Consolidated Appropriations Act of 2014 that authorizes nonprofit organizations to administer rental assistance in permanent housing have on my project?

The [Consolidated Appropriations Act of 2014](#) (Public Law 113-76, approved January 17, 2014) authorized nonprofit organizations to administer rental assistance only for permanent housing under the CoC Program. This means, as a recipient of funds for transitional housing, you may only use a State, local government, or Public Housing Authority (PHA) to administer rental assistance under your transitional housing project. This is because [24 CFR 578.51\(b\)](#) requires rental assistance under both permanent and transitional housing to be administered by a State, unit of general local government, or PHA. The Consolidated Appropriations Act of 2014 only addressed rental assistance administration in permanent housing.

In transitional programs, could we designate just a portion of units so we can still accept women who don't qualify under category one or four?

If you want to put forward an application that has 25 units, you are allowed to seek funding for 10 of those 25 units. You do not have to put forward funding for the entire project; it can be for subset of units.

Can funds used to purchase a property for a Transitional Housing site count toward the required match?

No, funds to purchase or acquire property are not eligible for match as costs for acquisition are ineligible.

For Transitional Housing, what level of documentation is expected for the 20 hours of required work/engagement, especially since the RFP says the project description does not create a reporting or documentation requirement?

At this moment in time, we do not have further guidance from HUD around what the documentation level is expected to be. If and when we get that information, KCRHA will distribute that information. At this moment in time, we would look at whether or not your program is able to provide those services, likely documented through various forms such as case notes, attestations, or other kinds of documentation that you may have. However, there is not a requirement at this moment.

If a participant graduates from a Transitional Housing Program and applies for and moves into the same organization's Permanent Housing program, would that be counted as an exit?

Yes, this would be considered as an exit to Permanent Housing.



If transitional participants pay a program fee, is that an issue?

An occupancy fee may be charged. It must be based on income. There are specific rules that HUD has around occupancy fees:

- [Occupancy charges](#) collected from residents of transitional housing may be reserved to assist the residents move into permanent housing ([§ 578.97\(c\)](#)).
- [HUD details on charging rent](#):
 - Projects that provide Rental Assistance to program participants must charge rent that is the highest of these three figures. In these cases, the program participant's contribution is paid straight to the landlord and the recipient pays the landlord the difference of the program participant's contribution and the contract rent.
 - Please note that a transitional housing program operated by a non-profit cannot use rental assistance.
 - Projects that support housing with leasing funds do not have to charge an occupancy charge (which is similar to rent), but if they do, they are not permitted to charge any amount higher than the highest of these three figures. In these instances, the recipient pays the landlord 100 percent of the rent and collects the occupancy charge from the program participant.

Is it possible for a 25 bed facility to complete a replacement application for Transitional Housing for 15 beds and a DV bonus application for 10 bed, for example?

This is a risk for double-dipping as the costs for operations, staffing, etc would need to be clearly separated and tracked to ensure costs do not overlap. It is not likely that HUD would fund the same program with two different grants in this manner.

Can a city or local government be the applicant for a Transitional Housing project under this NOFO?

Yes, a local government is an eligible applicant under the NOFO.

Can we include in our CoC funds budget a line item for rental assistance? Not for ongoing rental subsidies, but for clients move-in costs such as security deposit and first month's rent.

No, that is not allowed for a Transitional Housing program.

I wanted to get clarity around the 20 hours weekly of required services participation for Transitional housing program residents. We are drafting a supportive services agreement for participants to sign that lists the eligible activities for the 20 hour a week requirement. I saw examples of the activities in the NOFO but didn't see a clear list of all eligible activities or a definition. Is there a resource you could point me to that lists the activities for the 20 hour a requirement?



There is no official guidance beyond the stated required of 20 hours of supportive services per week. To review what HUD includes as eligible activities for supportive services, please see the [Supportive Services At a Glance](#).

Can CoC funds be used to pay for a hotel, motel or other short-term lodging (SRO, hostel, air bnb) for a participant?

(Partial) A: CoC Program leasing funds

CoC Program Leasing funds may be used to pay for motel rooms, *so long as the following requirements are met:*

1. *The recipient signs a yearlong lease with the hotel.*
2. Each household being assisted with CoC Program leasing assistance must have their own separate sub-lease to be considered a separate household for the purposes of CoC Program eligibility. In projects with Leasing, the recipient or subrecipient is the direct lease holder with the landlord and must enter into subleases with program participants.
3. All housing assisted with leasing or rental assistance funds under the CoC Program must meet minimum Housing Quality Standards (HQS) as set forth in section [578.75\(b\)](#) of the CoC Program interim rule.
4. All housing for which leasing or rental assistance payments are made must meet FMR and rent reasonableness standards. Rent reasonableness should be determined by considering the reasonableness of the rent in relation to rents being charged for comparable unassisted units, taking into account the location, quality, size, type, and age of unit, as well as any amenities, housing services, maintenance, and utilities provided by the owner.
5. In Leasing, the FMR used is the FMR for the full unit size being leased by the recipient or subrecipient. For example, a two-bedroom unit would use the published FMR for a two-bedroom unit.
6. In projects using Leasing, CoC Program funds may not cover costs exceeding FMR, even if the unit's Rent Reasonableness amount is above FMR. In situations where a unit is found to be Rent Reasonable but the rent is above FMR, the recipient must use other funds, such as leverage (not Match), to cover those costs. You also cannot use program income to cover costs above FMR, even if reasonable.

Please also note, if grant funds or program income are not used to pay for these costs and instead the recipient uses funds other than grant funds, they could count the money spent on those costs as match, so long as the costs meet the requirements set forth in section 578.73 of the CoC Program interim rule. Match is actual cash or in-kind resources contributed and expended on eligible CoC Program costs. If the cost would otherwise be eligible, then non-CoC Program funds could be counted as match. If the cost is not eligible, it can not count as match.



Is it permissible to co-locate transitional housing projects in the same building as non CoC projects serving another purpose?

Co-location is fine. You just need to make sure that the CoC funds you are receiving are only being used to operate the program it's being used to operate.

Can you please say more about the 20 hour per week engagement and services requirement for transitional housing? Does employment count and if so, to what extent?

There is little guidance from HUD about this specific perimeter. However, work engagement does work towards the 20 hours a week requirement. We don't have clear information about how that is tracked and documented. For more information, please [see page 63 and 64 of the FY26 CoC NOFO](#).

Can we make arrangements for several locations to operate one Transitional Housing program or do they have to be in the same location? So, if a provider has two locations and another has three, would that work?

There is nothing precluding partnerships within an application. Just ensure that there is a clear budget and define what those partnerships look like: if you are applying together or if you will have them be a subrecipient. Anyone who has a sub recipient is responsible for ensuring that the person you are subcontracting with is abiding by and meeting all of the compliance and programmatic rules. Think about that for any partnerships, whether you wanted to have a collective application to do something together and have your own separate buckets of money, or if you would apply and then subcontract with someone else. There are different kinds of contracting and monitoring responsibilities that come along with each of those choices. There's nothing precluding a collective or consolidated application between two separate providers to offer like services.

Do we need site control to apply for funding for transitional housing?

This will be required during the post-award period if HUD funds the project. It is not required at this stage.

Would a Transitional Housing Tiny House Village be eligible under this RFP? If so, would we need a waiver to use shared kitchen and hygiene facilities rather than unit-specific facilities?

The following Codes and Standards are required for units funding with CoC leasing dollars:

What are Housing Quality Standards (HQS)? ([§ 578.75\(b\)](#))

All units paid for with CoC leasing or rental assistance funds must meet certain basic Housing Quality Standards (HQS) prior to expending CoC funds on that unit. All units must additionally meet state and local codes.



- The recipient or subrecipient must physically inspect all units prior to expending CoC funds and must continue to do so annually throughout the grant period. The annual review can take place during lease renewal.
- Inspectors do not need to be certified.
- The owner of the unit has 30 days to address and correct any deficiencies in the unit.
- The recipient or subrecipient must maintain documentation of compliance with HQS, including inspection reports.

Are there requirements around Lead-Based Paint? ([24 CFR Part 35](#))

CoC recipients and subrecipients are expected to screen for, disclose the existence of and take reasonable precautions regarding the presence of lead-based paint in leased or assisted units constructed prior to 1978. To learn how to identify lead-based paint, the types of deterioration and how to repair the problem, please complete HUD's [Lead Based Paint Visual Assessment Training Course](#).

What is Environmental Review? ([§ 578.31](#))

An environmental review is the process of reviewing a project and its potential environmental impacts to determine whether it meets federal, state, and local environmental standards. Certain grant types are required to perform an environmental review to ensure that the project site is free from any hazardous materials that could adversely affect the health and safety of the occupants. See the [CoC and ESG Environmental Review Virtual Binder](#) for more information.

Additionally, on [pages 36-37 of the NOFO](#), HUD provided updated guidance on housing with a shared kitchen and bathroom

Housing with shared kitchen and bathroom facilities.

Under the CoC Interim Rule at 24 CFR 578.75, housing leased with Continuum of Care program funds, or for which rental assistance payments are made with Continuum of Care program funds, must meet the applicable standards at 24 CFR 982.401 (HQS), and starting on October 1, 2026, 24 CFR 5.703 (NSPIRE). Both HQS and NSPIRE require a bathroom and a kitchen in the unit. HUD will consider requests to waive this regulatory requirement for good cause to facilitate projects proposing a housing model that does not meet this standard, such as Single Rooms Occupancy units (SROs).

We currently operate a transitional housing property with existing tenants, but it is underfunded for services, operations, and security. We are not currently receiving CoC funds for this property. Would it be eligible to apply for New Project Transitional Housing funds under this RFP, or would it need to go through a renewal/expansion process instead?



As a project not receiving CoC funding, it would be considered a new project. Please complete the new project application and how funding would be used to expand current services or operations.

Is leasing assistance an eligible cost under a transitional housing program (transitioning from RRH to TH) or is the only transitional housing model allowed the master lease model?

Leasing dollars have to be used to lease a property or pay lease fees. The organization must hold the lease and be the responsible leasee.

Please clarify - new TH can only be operating or leasing. Not rental assistance.

Correct. No rental assistance for TH projects. Only allowed via government or housing authority administer the rental assistance.

Can rental income from Transitional Housing programs can be used as part of the 25% match.

Yes, this is permitted, see the below information from HUD:

Program Income: Program income is funding received by the recipient/ subrecipient from a grant-supported activity. Resident occupancy charges paid directly to the recipient/subrecipient in a leasing project are program income, whereas rent paid to a landlord is not. The Consolidated Appropriations Act of 2018 permits FY 2015, FY 2016, FY 2017 and FY 2018 grant recipients to use program income as match. Check the annual CoC Program NOFA or other official HUD correspondence for updates.

For more information on match requirements, see the [HUD Match At a Glance](#).

Please clarify if the Tiny House Village model as Transitional Housing is eligible for CoC funding?

As long as the model meets the [HUD requirements of Transitional Housing](#):

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.

Participants in a TH project must have a signed lease, sublease, or occupancy agreement with the following requirements:

- An initial term of at least one month
- Automatically renewable upon expiration, except by prior notice by either party
- A maximum term of 24 months



Further details on Transitional Housing requirements are detailed [here](#).

Supportive Service Only

What are the requirements to use CoC Supportive Service Funds to provide mental health or outpatient services?

Mental Health Services

Under Section [578.53\(e\)\(11\)](#) of the [CoC Program interim rule](#), mental health services are considered an eligible supportive services cost. Eligible costs are the direct outpatient treatment of mental health conditions that are **provided by licensed professionals**. Component services are crisis interventions; counseling; individual, family, or group therapy sessions; the prescription of psychotropic medications or explanations about the use and management of medications; and combinations of therapeutic approaches to address multiple problems.

As with any other supportive service cost under the CoC Program, the mental health services costs must be necessary to assist the program participant to obtain and maintain housing (see section [578.53\(a\)\(1\)](#) for more information). While paying for mental health care is not an obligation of the project, if paying for the mental health care helps stabilize a family or individual and fosters continued housing stability, projects are encouraged to consider assisting participants with this supportive service. The recipient must ensure that the cost of the assistance provided is reasonable and appropriate, in accordance with the Omni Circular ([2 CFR 200](#)).

A recipient's policies and procedures should include guidelines on providing this type of supportive service. One item to consider is including whether this supportive service cost would be a one-time, limited, or ongoing expenditure. If ongoing support is necessary, recipients could consider whether it is appropriate and/or sustainable for the project to pay for it and consider connecting the participant with other mainstream resources. Recipients should check with the CoC to determine if the CoC has written standards and policies and procedures in place already.

Eligible Cost Recordkeeping and Documentation Requirements

[2 CFR 200](#) requires that all costs paid for with Federal funds must be allowable, reasonable, and allocable. In addition, the recipient or subrecipient must maintain documentation that all requirements are documented and maintained in the organization's records for the timeframe specified in the CoC Program interim rule, section [24 CFR 578.103](#).

Restrictions on Combining Funds

Where additional funds are provided through a non-CoC Program source, the recipient must ensure the funds are used to cover costs not already assisted by any other duplicative federal, State, or local housing program as determined by HUD.



Example

Copays for mental health services are an eligible cost if they are not covered by any other source of funds. In other words, CoC Program funds should not be used to pay the costs of medications when a client is eligible to have these costs paid for by Medicare, Medicaid, or another government program.

Outpatient Health Services

Supportive services funds may be used to pay reasonable medical care costs to assist the program participant. Under Section [24 CFR 578.53\(e\)\(12\)](#) *Outpatient health services*, indicates that "Eligible costs are the direct outpatient treatment of medical conditions when provided by licensed medical professionals" including:

- (i) Providing an analysis or assessment of an individual's health problems and the development of a treatment plan.
- (ii) Assisting individuals to understand their health needs.
- (iii) Providing directly or assisting individuals to obtain and utilize appropriate medical treatment.
- (iv) Preventive medical care and health maintenance services, including in-home health services and emergency medical services.
- (v) Provision of appropriate medication.
- (vi) Providing follow-up services.
- and (vii) Preventive and non-cosmetic dental care.

As with any other supportive service cost under the CoC Program, the medical care costs must be necessary to assist the program participant to obtain and maintain housing (see section [24 CFR 578.53\(a\)\(1\)](#) for more information). While paying for medical care is not an obligation of the project, if paying for the medical care helps stabilize a family or individual and fosters continued housing stability, projects are encouraged to consider assisting participants with this supportive service. The recipient must ensure that the cost of the assistance provided is reasonable and appropriate, in accordance with the Omni Circular ([2 CFR 200](#)).

A recipient's policies and procedures should include guidelines on providing this type of supportive service. One item to consider is including whether this supportive service cost would be a one-time, limited, or ongoing expenditure. If ongoing support is necessary, recipients could consider whether it is appropriate and/or sustainable for the project to pay for it and consider connecting the participant with other mainstream resources. Recipients should check with the CoC to determine if the CoC has written standards and policies and procedures in place already.

When determining the frequency and duration of this cost, case managers should assess whether the expense is best treated as a one-time support while assisting the participant in securing longer-term health coverage (e.g., Medicaid or other mainstream health benefits).



Can you speak more to the definitions of Supportive Services?

There are two definitions of Supportive Services:

- 1) The Supportive Services Project Type: [More information here.](#)
- 2) Supportive Services Budget Line Item: [More information here.](#)

For services support only questions, it looks like that one can't ask for rental assistance dollars if one's proposing a housing navigation type program. One might need rental assistance dollars, but it looks like that's excluded. Those funds would have to be non-CoC, right?

Correct. If you want a Supportive Services only project, offer that type of service outside of CoC funds. Those funds cannot be calculated toward your 25% match as it's not an eligible cost for a Support Services only project. When thinking about your budget, ensure that any match you are considering is an eligible cost for that project.

How can I provide supportive services that are connected to a permanent housing project?

Supportive services only may serve folks in permanent housing only for the first six months they are in permanent housing. It has to be very, very clear that the funding is only funding the staff time for those certain residents only for their first six months in housing. You must ensure that you are tracking staff time, how you are allocating and paying for that staff time, and what resident they moved in their first six months only. The support service only funds are only supporting those in that housing for the first six months upon move-in.

Do Supportive Services Only projects require a match?

Yes.

Am I correct in understanding that all new SSO projects should use [this application?](#)

Yes, that is the correct application for any new SSO projects.

