

Navigating the HUD Continuum of Care NOFO

History, Context, and a Field Guide to the FY2026 CoC Program Competition

NOFO CPD-2600-DC-0025 | Applications due August 26, 2026, 8:00 PM ET - submit early (see Deadlines)

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Companion file: FY2026 CoC NOFO Navigator & Scoring Workbook (Excel)

Unofficial preparation aid. Where this guide and the NOFO differ, the NOFO controls.

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If You Read Nothing Else: The One-Page Survival Guide

New Collaborative Applicant or new CoC director? This page is the whole competition. Everything else in this guide explains how to do these eight things well. Terms are defined in plain language on the workbook's Beginner's Guide and Glossary tabs.

The whole competition in one line: GIW > publish local competition > score and rank projects > written notices (by Aug 11) > Priority Listing + CoC Application + project applications > submit in e-snaps (target Aug 24) > HUD awards (by Dec 1).

1. **Confirm your GIW.** The Grant Inventory Worksheet is HUD's list of your renewable grants. If it is wrong, you renew the wrong amounts. Reconcile it with your field office now.
2. **Know your ARD.** One year of all renewable grants = Annual Renewal Demand. Tier 1 (60% of ARD) is relatively protected; everything above it competes nationally. This number drives your strategy.
3. **Publish your local competition.** Post the timeline, how to apply, and the exact rating tool (points visible) on your website. Screenshot everything with the system date showing - HUD scores your transparency.
4. **Score and rank every project.** Non-conflicted panel, published tool, unique rank for every project, written justification for any move out of score order.
5. **Send written decisions by August 11.** Every applicant gets a letter - outside e-snaps - saying accepted-and-ranked, rejected, or reduced, with reasons.
6. **Build the CoC Application.** The 200-point narrative about your whole system. It is the biggest factor in whether your Tier 2 projects survive nationally.
7. **Build the Priority Listing and project applications.** The official ranked list (plus reallocation forms and HUD-2991), and every project's own e-snaps application - renewal names matching grant agreements exactly.
8. **Submit early - target August 24. Deadline: August 26, 8:00 PM ET.** HUD's materials printed three different times earlier in the cycle; as of late July, HUD's competition webpage and the NOFO cover agree on 8:00 PM ET (p. 96 still prints 11:59:59 PM). Treat 8:00 PM ET as final. Late = ineligible, no exceptions. e-snaps has frozen on CoCs at past deadlines; two days of buffer is the cheapest insurance in this competition.

Part 1. The CoC Program in Brief

The Continuum of Care (CoC) Program is HUD's largest competitive homeless assistance program. It funds permanent supportive housing, rapid re-housing, transitional housing, supportive services, HMIS, and planning through an annual national competition. Awards flow to nonprofits, states, local governments and their instrumentalities, Indian Tribes and tribally designated housing entities, and public housing agencies; for-profit entities cannot apply or subreceive.

Where it came from

The McKinney-Vento Homeless Assistance Act of 1987 created HUD's homeless assistance programs - originally separate grants (Supportive Housing Program, Shelter Plus Care, and SRO Moderate Rehabilitation). The HEARTH Act of 2009 consolidated those three into today's single CoC Program, wrote the local planning bodies called Continuums of Care into statute, and shifted the program toward measurable system performance. HUD implemented HEARTH through the CoC Program interim rule, 24 CFR part 578 (77 FR 45422, July 31, 2012) - still, fourteen years later, the governing rule.

How the annual competition works

- **Registration.** Each spring, the CoC's designated Collaborative Applicant registers the CoC (FY2026: Notice CPD-26-03; registration closed April 23, 2026). Applicants seeking Unified Funding Agency status apply at registration (CPD-26-04).
- **GIW review.** The CoC reviews its Grant Inventory Worksheet - the list of renewal-eligible grants that establishes Annual Renewal Demand (ARD).
- **NOFO publication.** HUD publishes the NOFO on Grants.gov (this year: June 1, 2026), opening an application window - 86 days this year.
- **Local competition.** The CoC invites, scores, and ranks project applications using its own published rating tool, then assigns each project a unique rank on the Priority Listing. This local process is itself scored by HUD.
- **Consolidated Application.** The Collaborative Applicant submits three things in e-snaps: the CoC Application (the scored narrative), the Priority Listing, and every project application.
- **HUD review and award.** Threshold review (pass/fail), merit review (200-point score), risk review, then tiered selection. Awards must be announced by December 1, 2026.

Two structural facts drive strategy. First, renewal funding is not guaranteed: only Tier 1 (60% of ARD this year) is conditionally protected, and everything else competes nationally. Second, every Tier 2 project's national score depends heavily on the CoC Application score - so the quality of the CoC-level application directly determines whether individual projects survive.

Part 2. A Short History of the Competition (FY2010-FY2026)

Sixteen years of NOFOs tell a consistent story: rising dollars, rising performance expectations, and steadily higher stakes for the CoC-level application. The table below is compiled from the original NOFO/NOFA documents (all included in the document repository accompanying this guide).

FY	Funds available	Docket	What defined it
FY2010	~\$1.68 billion	FR-5415-N-17	Pre-HEARTH: separate SHP, S+C, and SRO programs; General + Program NOFA sections.
FY2011	~\$1.63 billion	FR-5500-N-34	Last competition under the legacy programs (technical correction Sept 2011).
FY2012	~\$1.61 billion	FR-5600-N-41	First competition under the consolidated CoC Program and the new interim rule (24 CFR 578); introduced the two-tiered ranking approach.
FY2013-14	~\$1.7B + ~\$1.83B	FR-5700-N-31B / FR-5800-N-30	One combined two-year competition during sequestration-era budgets; reallocation pushed as a permanent tool.
FY2015	~\$1.89 billion	FR-5900-N-25	Revised NOFA (Sept 2015); performance era begins in earnest - emphasis on system performance measures and prioritizing chronic homelessness.
FY2016	~\$1.9 billion	FR-6000-N-25	Stronger push on Housing First adoption, coordinated entry, and reallocating underperformers.
FY2017	~\$2 billion	FR-6100-N-25	Crossed \$2B; continued system-performance scoring.
FY2018	~\$2.1 billion	FR-6200-N-25	DV Bonus introduced (up to \$50 million for domestic-violence-dedicated projects).
FY2019	~\$2.3 billion	FR-6300-N-25	Largest pre-COVID competition; expanded DV Bonus.
FY2020	No competition	N/A	COVID-19: HUD cancelled the competition and renewed expiring grants non-competitively (announced January 2021).
FY2021	~\$2.656 billion	FR-6500-N-25	Post-COVID restart; ~\$77M YHDP renewal funding folded in; emphasis on racial equity and lived experience.
FY2022	~\$2.794 billion	FR-6600-N-25	Plus the separate \$322M Special NOFO to Address Unsheltered and Rural Homelessness (FR-6500-N-25S) - the first supplemental of its kind.
FY2023	~\$3.134 billion	FR-6700-N-25	Record funding; ~\$147M for competitive YHDP renewal/replacement.
FY2024	~\$3.524 billion	FR-6800-N-25	A combined FY2024-FY2025 NOFO intended to cover two years, with FY2025 renewals to be

			processed without a new competition. HUD announced ~\$3.6B in awards (January and March 2025). CoC Builds (\$75M PSH capital, FR-6901/6902-N-25A) ran separately in 2025.
FY2025	\$3.9B announced; ~\$3.85B renewed	FR-6901-N-25	The disrupted year - see Part 3. Standalone NOFO published November 2025, withdrawn, reissued December 19, enjoined, and vacated by the court June 29, 2026; Congress had directed quarterly renewal awards in the meantime.
FY2026	~\$4.04 billion	CPD-2600-DC-0025	Current competition - published June 1, 2026; due August 26, 2026. Tier 1 at 60% of ARD; \$1.3B for new projects with TH/SSO priority. See Part 4.

Three eras are worth understanding:

- **Consolidation (FY2010-FY2015).** HEARTH took effect mid-stream: FY2012 was the first competition under the new consolidated program and introduced the two-tier ranking structure that still defines strategy today. Budgets were flat (~\$1.6-1.9B), making reallocation the only growth path for most CoCs.
- **Performance and Housing First (FY2015-FY2023).** Scoring increasingly rewarded system performance measures, coordinated entry, Housing First adoption, and equity initiatives. The DV Bonus arrived in FY2018; the FY2022 Special NOFO added a first-ever \$322M supplemental for unsheltered and rural homelessness; funding grew past \$3B.
- **Realignment (FY2025-present).** The FY2025 and FY2026 NOFOs changed the scored priorities substantially: Housing First adoption is no longer a scored factor, and the rubric now rewards self-sufficiency outcomes, treatment and recovery capacity, supportive-service participation requirements, transitional housing, and cooperation with public-safety efforts. CoCs that built their applications around the prior rubric should re-map their evidence to the new criteria.

Part 3. The FY2025 Disruption - and Why It Matters Now

FY2025 was the most chaotic cycle in the program's history. The sequence matters because the FY2026 NOFO carries most of its policy changes forward, and because the litigation it triggered is still alive.

1. FY2024's combined NOFO (FR-6800-N-25) had promised FY2025 renewals without a new competition.
2. **November 13-14, 2025:** HUD instead published a standalone FY2025 NOFO with sweeping changes - a 30% cap on permanent housing as a share of ARD, Tier 1 cut to 30%, new TH/SSO priorities, and scoring built around service participation and public-safety cooperation. HUD announced \$3.9 billion.
3. **December 8, 2025:** HUD withdrew the NOFO amid immediate legal challenge.
4. **December 19, 2025:** HUD reissued a modified FY2025 NOFO (FR-6901-N-25) - but a preliminary injunction in NAEH v. HUD (D.R.I.) barred implementation.
5. **February 3, 2026:** The Consolidated Appropriations Act, 2026 (P.L. 119-75) resolved the impasse by directing HUD to renew expiring CoC projects.
6. **March-May 2026:** HUD made renewal awards quarterly: \$349.2M for 622 projects (March 31), \$1.095B for 1,826 projects (April 27), and \$2.403B for 4,241 projects (May 21) - about \$3.85B in total.
7. **June 29, 2026:** The district court in NAEH v. HUD ruled the FY2025 NOFO's new award criteria and one-week application window unlawful and vacated them. HUD can appeal. The ruling addresses the FY2025 notice, not this one - the FY2026 competition and its deadline stand - but it raises the litigation risk around provisions carried forward.
8. **July 2, 2026:** The Alliance and co-plaintiffs filed a new complaint challenging components of the FY2026 NOFO itself and HUD's late obligation of FY2025 awards. They asked for expedited briefing (arguments from both sides by July 31) and a summary-judgment decision by about August 10, with a preliminary injunction requested in parallel. A ruling could land mid-competition.
9. **July 16, 2026:** HUD posted notice of intent to modify the FY2026 NOFO to add a direct-to-HUD application process for geographic areas where HUD finds the CoC does not meet program requirements under 24 CFR 578.13 (so far one CoC: CA-600). A preview of the modified NOFO and its Appendix III is posted on HUD's competition page.
10. **July 21, 2026:** Project applications, the Priority Listing, and their detailed instructions went live in e-snaps, seven weeks after the NOFO published. The CoC Application and its detailed instructions were still pending as of July 29; watch HUD's competition page.

What it means for FY2026:

- The appropriations act also shaped this year's NOFO: Congress required Tier 1 at no less than 60% of ARD, NOFO publication by June, and awards by December 1, 2026. That is why FY2026 looks like a moderated version of the FY2025 design.
- Policy provisions carried forward from the FY2025 NOFO are already contested: the June 29 ruling vacated their FY2025 versions, only some FY2026 provisions (Tier 1 at 60%, elderly and disabled preferences) have explicit cover in the appropriations act, and the July 2 lawsuit puts the FY2026 versions directly at issue. Prepare under the NOFO

as written, but watch for rulings and HUD modifications, and preserve flexibility in local decisions.

- Two cycles of awards (FY2025 renewals and FY2026 competition) are landing within roughly twelve months of each other - budget and grants-management staff should plan for overlapping grant terms.

Part 4. The FY2026 NOFO (CPD-2600-DC-0025)

Quick facts

Item	FY2026 fact
Funding opportunity	CPD-2600-DC-0025, published June 1, 2026 (Grants.gov #361999)
Deadline	August 26, 2026, 8:00 PM ET, in e-snaps (late = ineligible). HUD's materials conflicted on the time earlier in the cycle; as of July 29 the NOFO cover (pp. 3, 5, 59, 115) and HUD's competition webpage both say 8:00 PM ET, while p. 96 still prints 11:59:59 PM. Treat 8:00 PM ET as final and submit by August 24.
Total available	Approximately \$4.04 billion total through this NOFO (HUD's figure, p. 6): ~\$4.010B from the FY2026 appropriation (P.L. 119-75) plus ~\$52M in FY2025 funds for DV Bonus; ~7,000 awards expected (pp. 6-7)
New projects	\$1.3 billion, priority for Transitional Housing and Supportive Services Only projects (pp. 34-35)
Tier 1 / Tier 2	Tier 1 = 60% of Annual Renewal Demand; remaining 40% competes nationally in Tier 2 (pp. 30, 90)
Tier 2 project score	100 pts: up to 50 from the CoC Application score (proportional), up to 40 from local rank position, 10 for service-participation requirements (SSO/HMIS automatic) (p. 90). Note: the NOFO does not state whether bonus/preference points count toward the proportional score - verify with HUD
CoC Application score	200 base points + 6 (Merger/UFA) + 14 (preference) = 220 maximum (pp. 69-70, 84-85)
Selection floors	At least \$104M to DV Bonus projects and \$430M to permanent housing serving families with children (pp. 88-89)
Match	25% cash or in-kind for all costs except leasing (24 CFR 578.73) (p. 26)
Key caps	CoC Bonus up to 15% of FPRN; DV Bonus up to 20% of PPRN (max \$5M); Planning 5% of FPRN up to \$1.5M; UFA lesser of 3%/\$1.25M; project admin 10% (pp. 11-12, 22, 25)
15-day rule	Written notification to every project applicant - acceptance/rejection/reduction with reasons, outside e-snaps - by August 11, 2026 (pp. 71, 96)
Awards	Announced no later than December 1, 2026 (required by the FY26 appropriations act) (pp. 4, 37)

How the money flows

Every CoC may apply for: ARD + CoC Bonus + DV Bonus + CoC Planning (+ UFA costs if applicable). HUD then selects projects nationally in sequence: planning and UFA costs first; then all Tier 1 projects that pass thresholds; then Tier 2 by project score - ensuring at least \$104M in DV Bonus projects, at least \$430M in permanent housing for families with children, and selecting new Transitional Housing and SSO projects first within the \$1.3B new-project pool (NOFO pp. 88-89).

The Tier 2 project score (100 points) is the engine of the competition: up to 50 points proportional to your CoC Application score, up to 40 points from the project's position in your ranking (HUD's formula rewards placing projects higher and smaller), and 10 points for supportive-service participation requirements - automatic for SSO and HMIS projects (p. 90). One ambiguity to flag: the NOFO does not state whether the 20 bonus/preference points count toward the proportional CoC score, and its illustrative example cites a stale '65 out of 130.' The companion workbook models HUD's published formula and lets you compute both bases; verify HUD's treatment in the Detailed Instructions or via CoCNOFO@hud.gov before relying on a modeled score. (Checked July 1, 2026: HUD's June FAQ does not address this question; it remains open.)

How the CoC Application is scored

Merit review category	Max points	What it covers (NOFO pp. 69-86)
a. Project Capacity, Review, and Ranking	14	Your local rating tool (objective criteria, SPM weight, housing-project factors), ranking transparency and 15-day notifications, reallocation practice (or 20% cumulative since FY2021).
b. System Performance	64	PIT reductions (20 pts across six comparisons, incl. vs. 2018/2019), encampment reduction (8), SPM outcomes - exits, returns, employment income (12) - and data quality/timeliness.
c. CoC Coordination and Engagement	122	Structure and planning (16): board composition incl. six named sectors, transparency, gap strategy. Community coordination (72): treatment and recovery services (20), service-participation requirements (8), supportive-services investment (8), public safety cooperation (14), workforce, outreach, PHA, reunification. Subpopulations (34): youth, families, veterans, DV survivors, re-entry, high utilizers, elderly, chronic PSH.
Base total	200	
CoC Merger / UFA bonus	+6	Automatic maximum for UFAs and for CoCs merged after the FY2024 registration deadline (p. 84).
Policy initiative preference	+14	Opportunity Zones (up to 4, form HUD-2996); CoC-wide policy under HUD's 'Advancing Recovery by Prohibiting Illicit Drug Enablement' criterion - no safe-consumption sites, paraphernalia distribution, or knowingly permitted illicit drug use in funded projects (up to 10) (p. 85). HUD's June FAQ confirms this is a legal-compliance certification, not a sobriety mandate: no required participant sobriety or

		treatment, no required exit for a first-time violation.
Maximum possible	220	

What is already fixed - and what you can still win

All 64 System Performance points rest on data positions largely fixed before the NOFO published - PIT counts already conducted, SPM data already submitted, HMIS data quality already in place. Self-assess those honestly, claim every partial-credit path, then put your effort where points are still winnable:

Point pool	Points	Can you still move it?
System Performance (PIT, SPM, LSA, HMIS quality)	64	MOSTLY FIXED. But claim all six PIT comparison paths (some reach back to 2018/2019), verify your HIC and bed-coverage numbers, and write the encampment-reduction evidence well (8 of these points accept narrative + local data).
Community coordination: treatment and recovery (20), public safety (14), service participation (8), services investment (8), workforce, outreach, ESG, data sharing, reunification, PHA (22)	72	WINNABLE NOW. This is the largest controllable pool in the NOFO. If your CoC is weak on treatment and recovery partnerships, start building them immediately - MOUs, sober housing identification, drug-court and CCBHC partnerships are documentation work, not performance history.
Subpopulation partnerships (youth, families, veterans, DV, re-entry, healthcare, elderly, chronic PSH)	34	WINNABLE. Most criteria need one documented partnership each, worth 4-6 points apiece. A focused letter-and-MOU campaign covers this.
Local process and ranking (rating tool, transparency, notifications, reallocation)	14	FULLY CONTROLLABLE. Pure process and attachments - the FY2024 debrief shows almost half of CoCs left some of these points on the table.
Board structure, transparency, gap strategy	16	WINNABLE IN WEEKS. Recruiting the six named board sectors is worth 4 points by itself.
Bonus and preference points (merger/UFA, Opportunity Zones, recovery policy)	20	GOVERNANCE ACTIONS. A board-adopted policy (up to 10) and form HUD-2996 (up to 4) require decisions, not data.

Read it this way: 156 of the 220 maximum points (everything except System Performance) respond to work you can still do between now and August 26. The workbook's Point Recovery Plan tab computes your personal version of this table from your Scoring Calculator entries.

Deadlines

Date	What	NOFO pp.
Passed - verify	LSA in HDX 2.0 (1/16/26); FY2024 SPM (3/4/26); 2026 PIT/HIC conducted last 10 days of January, submitted	73-74

	4/30/26 - all scored under criterion b.(8)	
Dec 10, 2025 - Aug 26, 2026	Required date range for all application attachments, including form HUD-2991	46, 98
Aug 11, 2026	Last day for written 15-day applicant notifications (outside e-snaps)	71, 96
Aug 26, 2026, 8:00 PM ET (submit by Aug 24)	Consolidated Application due in e-snaps	3, 5, 96
7 calendar days from notice	Cure window for technical application errors	102
Dec 1, 2026	HUD award announcement deadline	5, 37
Award + 30 / 45 days	Solo-applicant appeals (30); denied/decreased funding appeals (45)	117-118

Twelve things not to miss in this NOFO

1. **Tier 1 is 60% of ARD** - roughly 4x the renewal exposure CoCs carried before FY2025. Rank defensively (pp. 30, 90).
2. **\$1.3 billion for new projects, TH and SSO first** - the first time in years HUD has thrown the door open to new transitional housing and supportive-services projects, selected ahead of other new projects (pp. 34-35, 88).
3. **Service participation requirements are scored three times** - in the merit rubric (8 pts), in every Tier 2 project score (10 pts), and as a required local rating factor. Draft one model occupancy-agreement addendum CoC-wide and quote it verbatim (pp. 71, 79, 90). HUD's June FAQ confirms the agreement can live in a contract, occupancy agreement, lease, or equivalent - its own example is a monthly case-manager meeting.
4. **Treatment and recovery services carry 20 points** - the largest controllable point pool in the NOFO, including unit-level math (one treatment-participation unit per two persons with chronic substance use in your PIT = 6 of the 20) and credit for sober housing and CCBHC/drug-court partnerships. If your CoC is weak here, start building these partnerships this week (pp. 77-78).
5. **Public safety cooperation carries 14 points** - HUD asks for evidence the CoC cooperates with (and does not impede) encampment clearing, public drug-use enforcement, involuntary-commitment standards, and SORNA information sharing (pp. 80-81).
6. **Unsheltered PIT reductions dominate system performance** - 20 of 64 points across six comparisons, including against your 2018/2019 baseline; encampment reduction adds 8 more (pp. 72-73).
7. **Every project signs new certifications** - no drug-injection sites, no paraphernalia distribution, no knowingly permitted illicit drug use, no illegal discrimination (threshold, p. 60); a CoC-wide enablement-prohibition policy adds up to 10 preference points (p. 85).
8. **Board composition is now prescriptive** - lived experience (1 pt), three elected officials (3 pts), and all six named sectors: business, law enforcement, recovery housing, health, workforce, courts (4 pts) (pp. 75-76).
9. **DV Bonus now includes Transitional Housing** - alongside PH-RRH and SSO-CE; a \$104M national floor protects DV projects in selection (pp. 12, 35, 88, 91).

10. **YHDP runs through the Tier process this year** - YHDP renewal and replacement projects are selected through the FY2026 Tier 1/Tier 2 selection process, alongside DV Bonus projects (pp. 14, 35, 90).
11. **New-project quality thresholds have teeth** - new TH must be designed for roughly 20 hours/week of service engagement and score 6 of 8; new SSO street outreach must document law-enforcement cooperation (pp. 62-69). HUD's June FAQ confirms the 20 hours are flexible - case management, counseling, treatment, volunteering, work therapy, education, job training, and community-building all count - and no new reporting is required.
12. **Renewals are re-evaluated every year** - against returns, employment income, and service participation; expect continued audit emphasis (2 CFR 200.501 for grantees over \$1M) (pp. 61, 71).

Part 5. Preparing: Lessons from CoCs That Score Well

The eight-phase plan (June 9 - August 26)

1. **Pre-flight (by June 19).** SAM.gov active and matching e-snaps exactly; UEIs verified; Applicant Profiles re-marked complete; HDX submission confirmations gathered; criterion owners assigned.
2. **Publish the local competition (by June 26).** Timeline, rating tool (with points), ranking policies, and an RFP that genuinely invites new and faith-based applicants. Screenshot everything with system-generated dates.
3. **Score renewals (by July 3).** Published methodology, announced data-pull date, same APR period for all projects. The best CoCs (LAHSA, Vermont BoS) score renewals before or immediately after the NOFO drops.
4. **Local applications due (by July 10).** Six weeks of buffer is the KCRHA standard. Run partner outreach for treatment, recovery, workforce, and medical-respite providers - the FY2026 rubric pays for those partnerships.
5. **Evidence sprint (by July 24).** Leveraging letters (housing and healthcare - the two most-failed point pools in FY2024), service-agreement excerpts from every housing project, public-safety MOUs and encampment-resolution data, board roster gaps filled.
6. **Rank and notify (by August 11 - hard deadline).** Non-conflicted panel, signed COI attestations, published appeal grounds with a short window, written justification for any out-of-score-order move - then written notifications to every applicant, outside e-snaps, with reasons.
7. **QA week (August 17-21).** Every narrative answers every element of every question, in numbered format, in the right tense; no response refers reviewers elsewhere; every attachment dated December 10, 2025 - August 26, 2026; public posting of the full Consolidated Application.
8. **Submit early (by August 24).** The e-snaps Priority Listing has frozen at past deadlines; HUD's published remedy is an URGENT email - do not need it. Late applications fail threshold review. Full stop.

What FY2024 scoring data says

HUD's own debrief of the last completed competition shows exactly where CoCs bleed points - mostly on controllable process, not performance:

FY2024 pattern (HUD's own debrief)	The number	The lesson
Ranking-process attachments (1E-2, 18 pts)	Only 53% earned full points	Upload the scoring tool WITH points visible plus one actually-scored renewal form; every public-posting screenshot needs a system-generated date.
Housing leveraging letters (3A-1, 7 pts)	60% of CoCs scored zero	The single largest point pool left on the table - letters missing or non-conforming. HUD published a model letter.
Healthcare leveraging letters	42% scored zero	Same failure mode; chase conforming

(3A-2)		letters early.
RRH beds in the HIC (1D-5)	32% scored zero	A pure data-entry failure - verify your HIC inventory.
Bed coverage (2A-5)	Only 59% earned full points	Compute coverage before the application; the FY2026 bar is 85%.
Street outreach narrative (1D-3)	Only 37% earned full points	Systemic weakness - and FY2026 raises the stakes (outreach, encampments, public safety together exceed 25 points).
LSA submission (2A-6)	16% lost a point	Fully process-controllable; calendar the HDX deadlines.

HUD also named the three habits of below-average applications: failing to answer every element of multipart questions, writing long but convoluted answers, and answering 'what will you do' questions with 'what we are doing' (or vice versa). The fix is mechanical: number each response element to mirror the question, and match the verb tense.

Top 20 ways CoCs lose points

Compiled from HUD's FY2024 debrief, HUD's published e-snaps troubleshooting guidance, and the FY2026 NOFO's own rules. Print this; review it at your final QA session.

1. **Missing or non-conforming housing leveraging letters** - 60% of CoCs scored zero in FY2024.
2. **Missing healthcare leveraging letters** - 42% scored zero.
3. **Not answering every element of a multipart question** - HUD's #1 stated cause of low scores.
4. **Verb-tense mismatch** - describing plans where HUD asked what you are doing now, or vice versa.
5. **Referring reviewers to attachments or websites** instead of answering in the response box - reviewers score only what is in the box.
6. **Uploading the rating tool without point values visible.**
7. **No actually-scored sample renewal rating form attached.**
8. **Public-posting screenshots without a system-generated date.**
9. **Missing or late 15-day written notifications** (due August 11, outside e-snaps, with reasons).
10. **Ranked listing missing scores, funding amounts, or reallocation detail.**
11. **RRH beds missing from the HIC** - 32% of CoCs scored zero on this in FY2024.
12. **Bed coverage below 85% or never computed** before the application.
13. **Late or unusable LSA submission** - 16% of CoCs lost this fully controllable point.
14. **Unknown exit destinations above 10%** in HMIS housing projects.
15. **Unit utilization below 85%** - or no advance data-cleanup window announced to providers.

16. **Reallocating first-year renewals, or cutting a renewal budget with no corresponding new project** - that ARD is lost permanently.
17. **Wrong or expired UEI, or SAM.gov/e-snaps name mismatch** - severe award delays.
18. **HUD-2880 answered per project instead of organization-wide** - blocks later application submissions.
19. **Attachments dated outside December 10, 2025 - August 26, 2026** (including HUD-2991).
20. **Submitting at the deadline** - the e-snaps Priority Listing has frozen on CoCs before; late equals ineligible.

Part 6. The Evidence Library

The hardest practical question in this competition is: what evidence do we actually need to gather? This table answers it for the highest-value criteria. The workbook's Evidence Tracker tab turns each item into an assignable task with owner, due date, and status.

Area (max points)	NOFO ref	Evidence to gather
Treatment and recovery (20)	c.(5)	CCBHC/CMHC/PATH/GBHI partnership MOU; inventory of on-site SUD treatment across TH/RRH/PSH (30%+ target); count of units requiring treatment participation with the PIT chronic-SUD math; 24/7 detox access documentation; a named sober housing project; drug court/AOT/civil commitment partnerships; written warm hand-off protocol.
Public safety (14)	c.(14)	Law-enforcement/co-response MOUs; encampment resolution counts and written process; danger-to-self/others standards documentation; SORNA information-sharing description; local-law inventory with mitigation plan.
Service participation (8 + 10 per Tier 2 project)	c.(7), V.D	One model occupancy/service-agreement addendum adopted CoC-wide; signed excerpts (direct language) from every housing project; VAWA-compliance check.
Leveraging - housing and healthcare	Application	Commitment letters with value, dates, signature, and a specific commitment (HUD's model format); hospital/clinic/managed-care letters; medical respite agreements. The two most-failed point pools in FY2024.
Board and governance (12)	c.(1)-(3)	Roster showing lived experience, 3+ elected officials, and all six named sectors (business, law enforcement, recovery housing, health, workforce, courts); records of annual open-membership invitations and proposals from never-funded organizations.
Subpopulations (34)	c.(16)-(23)	One documented partnership per criterion: LEA/McKinney-Vento liaisons and early-childhood agreements; family project + TANF leveraging; VA partnership; victim services partnership; re-entry partnership; high-utilizer healthcare program; elderly services partnership; chronic-PSH level-of-care and moving-on policies.
Local process (14)	a.(1)-(3)	Rating tool with visible points; one scored renewal form; dated posting screenshots; 15-day notification copies; complete ranked listing; panel conflict-of-interest attestations; reallocation documentation.
Data quality (8)	b.(8)-(11)	HDX submission confirmations (LSA 1/16, SPM 3/4, PIT/HIC 4/30); HIC accuracy check with special attention to RRH beds; bed coverage and utilization calculations; unknown-destination report.
Preference points (14)	V.B.2	Board-adopted CoC-wide policy under HUD's 'Prohibiting

		Illicit Drug Enablement' criterion with remedies for violations; form HUD-2996 plus Opportunity Zone maps if 50%+ of the award is in OZs.
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Part 7. The Companion Workbook

This guide ships with an Excel workbook - FY2026 CoC NOFO Navigator & Scoring Workbook v1.5 - built from the same verified NOFO extraction. Every point value and page citation in the workbook was checked against CPD-2600-DC-0025, and every formula was machine-tested (a full-marks fill computes exactly 200 base + 20 bonus points; the Tier 2 ranking formula was verified against hand-computed examples).

Workbook tab	What it does
Start Here	Orientation, color key, disclaimer, version history.
Beginner's Guide	The survival guide in spreadsheet form: the competition in one line, the eight must-do steps, and ten key terms in plain language.
Quick Facts	Twenty key FY2026 facts with NOFO page citations.
NOFO Roadmap	Section-by-section guide to all 128 pages with the action each section requires; status tracking.
Timeline	Nineteen milestones, backwards-planned from August 26, with dependencies, owners, and status - hard HUD deadlines flagged in red.
Scoring Calculator	All 52 scored criteria (200 base + 20 bonus points) with HUD's exact criteria, data sources, and page numbers; enter estimated points and watch category subtotals and your projected score build.
Point Recovery Plan	Auto-computes your gap in every category from the Scoring Calculator, labels each pool by how winnable it is, and provides a 12-row action plan with owners, due dates, and status.
Tier 2 Calculator	Models the national 100-point Tier 2 project score (50 CoC score + 40 rank position + 10 service participation) for up to 15 projects using HUD's published formula. Because the NOFO does not specify whether bonus points count toward the proportional CoC score, the calculator offers both bases (base/200 and base+bonus/220) - verify with HUD (still unanswered in HUD's June FAQ as of July 1, 2026).
Evidence Tracker	Roughly 50 evidence items (letters, MOUs, screenshots, data pulls) organized by criterion with points at stake, owner, due date, and a status pipeline ending at 'Uploaded to e-snaps'.
Checklist	33 pre-flight, data, attachment, and submission checks - each tied to its failure mode and source.
Tips & Lessons	25 attributed, real-world tips from HUD's FY2024 debrief, high-performing CoCs, and TA providers.
Glossary	25 program terms in plain English.

Suggested use: the CoC director or Collaborative Applicant lead owns the Timeline and Roadmap tabs; the data lead owns the Scoring Calculator's Section b rows; the planning lead owns Sections a and c; the ranking committee uses the Tier 2 Calculator in its August session; and everyone works the Checklist in the final two weeks.

Part 8. Key Resources

- FY2026 NOFO listing (Grants.gov) - <https://www.grants.gov/search-results-detail/361999>
- HUD CoC Program page (instructions, navigational guides, updates) - <https://www.hud.gov/hud-partners/community-coc>
- e-snaps resources on HUD Exchange (navigational guides, common issues) - <https://www.hudexchange.info/programs/e-snaps/>
- CoC Program interim rule, 24 CFR part 578 - <https://www.ecfr.gov/current/title-24/subtitle-B/chapter-V/subchapter-C/part-578>
- National Alliance to End Homelessness - NOFO analyses - <https://endhomelessness.org/>
- HDX 2.0 (PIT, HIC, SPM, LSA submissions) - <https://hdx.hud.gov/>

Questions on the record: policy questions to CoCNOFO@hud.gov; e-snaps system questions through the HUD Exchange Ask-A-Question portal. Written answers create a defensible record.

About this guide

Version 1.5, July 29, 2026. History: v1.0 (June 9) initial release; v1.1 (June 10) clarified the funding-total composition, flagged the NOFO's internal deadline-time conflict and the Tier 2 proportional-score ambiguity, corrected the YHDP description; v1.2 (June 10) added the one-page survival guide, the fixed-vs-winnable points analysis, the top-20 failure list, and the Evidence Library, with three matching workbook tabs; v1.3 (July 1) added the June 29 NAEH v. HUD ruling, revised the deadline-time guidance after HUD's webpage posted 5:00 PM ET, and folded in HUD's June FAQ clarifications (20-hour engagement, participation agreements, drug-certification scope); v1.4 (July 1) full accuracy audit: every scored criterion, point value, and page citation was re-checked against the NOFO PDF (all 52 criteria and the Tier 2 ranking formula verified), two page citations were corrected (the overview date block is p. 5, not p. 4), and the Tier 2 basis note was reworded; v1.5 (July 29) updated the deadline time to 8:00 PM ET after HUD's webpage changed, added the July 2 FY2026 lawsuit and its expedited schedule, HUD's July 16 notice of intent to modify the NOFO (direct-to-HUD process, CA-600), and the July 21 e-snaps materials release, and added a feedback channel on the download page. Compiled from NOFO CPD-2600-DC-0025 (published June 1, 2026), the FY2010-FY2024 NOFO/NOFA documents, HUD's FY2024 Competition Debrief, HUD's FY2026 CoC NOFO FAQ (June 2026), HUD and Grants.gov program pages, NAEH analyses, CRS report IN12626, and published local competition materials from LAHSA, KCRHA, Alameda County (EveryOne Home), Vermont Balance of State, and others. Page citations refer to the FY2026 NOFO PDF.

Corrections and suggestions are welcome and make the next version better. Use the 'Flag an issue' button on the download page (gaitherdyn.com/blog/fy2026-coc-nofo-prep-package) or email gaither.stephens@gaitherdyn.com.

Prepared by Gaither Stephens, CEO of Gaither Dynamic. Research, drafting, formula construction, and verification were performed with Claude Cowork (Claude Fable 5, Anthropic), working from the primary source documents listed above.

This is an unofficial preparation aid created to help CoCs organize their work. It is not HUD guidance and not legal advice. Where this guide and the NOFO differ, the NOFO controls. Verify every requirement against the NOFO and HUD's Detailed Instructions before relying on it. Provisions carried forward from the FY2025 NOFO remain subject to active litigation - their

FY2025 versions were vacated on June 29, 2026, and appeals may follow; monitor HUD announcements for changes.