# CARROLL COUNTY CIRCLE OF CARING HOMELESSNESS BOARD Continuum of Care Policy

Policy on: Continuum of Care Project Ranking and Selection

Approved by Executive (CoC) Board on: 11/26/25

**Purpose:** To document the Carroll County, MD- 506 FY 2025 Continuum of Care (Continuum of Care) Project Ranking and Selection Process

### **2025 HUD NOFA**

The U.S. Department of Housing and Urban Development (HUD) released the <u>FY 2025 Continuum of</u> Care Competition and YHDP Notice of Funding Opportunity (NOFO) on November 13, 2025.

This NOFO rescinds and supersedes any awards of FY 2025 funds in the FY 2024 and FY 2025 Continuum of Care Competition Grants published on July 31, 2024, and includes several changes. HUD will continue to require Collaborative Applicants to rank all projects, except Continuum of Care planning and UFA Costs, in two Tiers. Tier 1 is equal to 30 percent of the Continuum of Care's 2025 Annual Renewal Demand (ARD). Tier 2 is the sum of all projects requested less Tier 1 up to the CoC's ARD plus Bonus funding. Bonus funding is available for new projects or an expansion of existing projects as described in HUD's NOFO and a bonus project serving victims of domestic violence is being offered.

# FY2025 Continuum of Care Funding Carroll County (MD-506)

Category		2025 Annual Grant Funding
Total Renewal Projects (Annual Renewal Demand or ARD)		\$591,797
Tier I (30% of ARD)	\$177,539	
Tier 2 (70% of ARD + bonus project funds)	TBD	
CoC Bonus		\$118,359
DV Bonus		\$51,106
Total Potential Annual FY 2025 Funding		\$761,262

## **Carroll County NOFO**

On November 25, 2025, The Carroll County Homelessness Board will issue a NOFO for the FY 2025 Continuum of Care Competition. Eligible applicants will be invited via public notice to submit Letters of Intent by December 1, 2025, and applications by December 12, 2025, for the following project types:

- 1. **Renewal projects** current Continuum of Care projects eligible for FY 2025 fund renewal are required to submit Project applications to the Collaborative Applicant for review, approval and ranking.
- 2. **Reallocations** Project applicants with eligible renewals can propose new projects by shifting funds from one or more existing projects to new projects without decreasing or increasing the Continuum of Care's ARD. Through the reallocation process:

- a. New projects created through reallocation must meet project eligibility and project quality thresholds.
- b. To create a transition grant through the reallocation process, the CoC must wholly eliminate one or more projects created through reallocation.
- c. No more than 30% of a Continuum of Cares ARD under this NOFO will fund Permanent Housing projects, including PH-PSH, PH-RRH, and Joint TH and PH-RRH projects. PH project types receiving more than 30% of the CoC's ARD need to be reallocated.
- d. The Continuum of Care Board will review project performance and monitoring results to determine if any projects should be recommended for reallocation per the Board Reallocation Policy.
- 3. **Bonus Projects** The Bonus is available to any existing or new applicant.
  - a. New projects created through the CoC Bonus must meet project eligibility and project quality threshold requirements established in the CoC's Ranking and Rating Tool.
  - b. Applicants may create a new Supportive Services Only (SSO) including Street Outreach for homeless meeting the criteria in the NOFO.
  - c. Applicants may create a new Transitional Housing (TH) component for homeless as defined in the NOFO.
  - d. Bonus project funding may also be used to expand an existing project. Both reallocation and bonus project types are eligible as are costs associated with VAWA 2022 amendments to section 423(a) of McKinney-Vento Homeless Assistance Act.
  - e. An additional allocation of DV bonus funding is available to create a new SSO-Coordinated Entry, Rapid Rehousing (PH-RRH), and Transitional Housing (TH) projects to serve victims of domestic violence as defined in the NOFO.
- 4. **New Projects** Applicants may apply for the following types of CoC projects that advance HUD's goals and objectives and show the capacity to meet HUD's System Performance Measures through the CoC Bonus or CoC Reallocation processes:
  - a. Supportive Services Only (SSO) Projects <a href="https://www.ecfr.gov/current/title-24/subtitle-B/chapter-V/subchapter-C/part-578/subpart-D/section-578.53">https://www.ecfr.gov/current/title-24/subtitle-B/chapter-V/subchapter-C/part-578/subpart-D/section-578.53</a> for homeless as defined in the NOFO.
  - b. Transitional Housing (TH) Projects for homeless as defined in the NOFO.

## Overview - Continuum of Care Project Selection Criteria

The Continuum of Care's projects will be evaluated by the Department of Housing and Urban Development's (HUD's) Goals and Objectives listed in the FY 2025 NOFO including but not limited to:

- 1. Ending the Crisis of Homelessness on Our Streets
- 2. Prioritizing Treatment and Recovery
- 3. Advancing Public Safety
- 4. Promoting Self-Sufficiency
- 5. Improving Outcomes
- 6. Minimizing Trauma

### **Tiers and Ranking:**

1. Tier 1 is 30% of the Continuum of Care's ARD. Tier 2 is the amount between the Continuum of Care's Tier 1 and the Continuum of Care's Final Annual Renewal Demand (ARD) plus any bonus funding.

- 2. The Continuum of Care must assign a unique rank to each project that it intends to submit to HUD for FY 2025 funding. Projects scoring highest, contributing to the HUD Policy Priorities will be placed into Tier 1 until all Tier 1 funds are allocated. The remaining projects selected for funding will be ranked and placed into Tier 2 until all Tier 2 funds are allocated. HUD strongly advises Continuum of Cares to rank higher those project applications that the Continuum of Care determines are high priority, high performing, and meet the needs and gaps as identified in the Continuum of Care.
- 3. Projects ranked in Tier 1 are considered relatively safe, while projects in Tier 2 are at risk.

### **Ranking and Selection**

- 1. All renewal and new applications will be reviewed and ranked using the CoC's Rating and Ranking Tool. The CoC's version of the ranking tool is attached to this policy.
- 2. The CoC's Executive Board may adjust individual projects up or down in the ranking or reallocate to fulfill HUD priorities, prevent potential losses of funding, and maximize the overall CoC application score.
- 3. Projects must meet Threshold Requirements including but not limited to:
  - a. HUD Threshold Requirements
    - i. Active SAM Registration
    - ii. Valid Unique Entity Identifier (UEI)
    - iii. Program Eligibility Requirements
    - iv. Financial Management Capacity
    - v. Resolution of Civil Rights Matters
    - vi. Required Certifications
    - vii. Eligible Population Served
    - viii. Homeless Management Information System (HMIS) Participation
    - ix. Applicant Certifications
    - x. No Outstanding Delinquent Federal Debts
    - xi. No Debarments or Suspensions
    - xii. Sufficiency of Financial Management System
    - xiii. Mandatory Disclosure Requirement
    - xiv. Prohibition Against Lobbying Activities
    - xv. Equal Participation of Faith-Based Organizations
  - b. Project Threshold Requirements
    - i. Compliance with the Rule
    - ii. Documentation of Match and Eligibility of Costs
    - iii. Historical Performance
    - iv. Non-Supplanting
    - v. Data Quality at 90% for Universal Data Elements
    - vi. Reasonable Costs
    - vii. Financial Feasibility
    - viii. Project Organizational Chart
    - ix. Project Termination, Non-Discrimination, and Grievance Policies
    - x. Projects Program Policies/Rules and Participant Rights and Responsibilities
    - xi. Proof of Ownership or Lease Agreement if Housing will be Provided at a Site-Based Location
  - c. CoC Threshold Requirements
    - i. Coordinated Entry Participation

- ii. Circle of Caring Participation
- iii. Complete Application
- iv. Bed/Unit Utilization
- v. Organizational Audit/Financial Review
- vi. Articles of Incorporation/Bylaws
- vii. Certificate of Good Standing
- viii. List of Board of Directors
- 4. Renewal/Expansion Projects will be scored on the following rating criteria:
  - a. Length of Stay
  - b. Exits to Permanent Housing
  - c. Returns to Homelessness
  - d. New or Increased Income
  - e. Supportive Service Requirements
  - f. Substance Use Treatment Availability
  - g. Leveraging Healthcare and Housing Resources
  - h. Priority Populations Served (Elderly Individuals and Individuals with a physical or developmental disability)
  - i. Workforce Development Services
  - j. Project Efficiency
  - k. Reasonable Costs
  - I. Coordinated Entry Referrals
  - m. Project Monitoring
  - n. PIT/HIC Participation
  - o. HUD Policy Priorities
- 5. New Projects will be scored on the following rating criteria for all projects:
  - a. Experience with Target Population and Project Type
  - b. Appropriate Accreditation and Licensures
  - c. Experience with Federal Funds
  - d. Project Meets the Needs of Clients to be Served
  - e. Project Supports HUD Policy Priorities
  - f. Plan for Workforce Development Services
  - g. Reasonable Cost per Household
  - h. Organizational Audit
- 6. New Projects will be scored on additional criteria based on the project type.
  - a. Transitional Housing Projects will be scored on the following criteria:
    - i. Supportive Services Provided
    - ii. Experience with Project Type/Population
    - iii. Performance of Similar Projects
    - iv. Access to Mainstream Resources
    - v. Supportive Services Requirement
    - vi. Amount of Supportive Services Provided
    - vii. Leveraging Housing and Healthcare Resources
    - viii. Substance Use Disorder Treatment Availability
    - ix. Coordinated Entry Participation
  - b. Supportive Services Only (Standalone) will be scored on the following criteria:
    - i. Annual Assessment of Service Needs of Program Participants
    - ii. Supportive Services Provided
    - iii. Documentation of Match

- iv. Supportive Services Required
- v. Substance Use Disorder Treatment Availability
- c. Supportive Services Only Street Outreach will be scored on the following criteria:
  - i. Documentation of Match
  - ii. Supportive Services Provided
  - iii. Partnership with Law Enforcement
  - iv. Experience with Project Type
- d. Permanent Supportive Housing will be scored on the following criteria:
  - i. Housing Meets the Needs of Program Participants
  - ii. Supportive Services Provided
  - iii. Target Populations: Elderly Individuals and Individuals with Physical and Developmental Disabilities
  - iv. Supportive Services Required
  - v. Documentation of Match
  - vi. Coordinated Entry Participation
- e. Rapid Rehousing will be scored on the following criteria:
  - i. Assistance Helps Participants Achieve Self-Sufficiency
  - ii. Supportive Services Provided
  - iii. Experience with Increasing Income of Target Population
  - iv. Supportive Services Required
  - v. Project Supplemented with Other Resources
  - vi. Documentation of Match
  - vii. Coordinated Entry Participation
- 7. New projects created through reallocation will be ranked based on the performance of the renewal application which is being reallocated and in accordance with NOFA guidance.
- 8. Expansion projects submitted by current applicants will be ranked based on the performance of the existing project to be expanded.
- 9. Bonus projects submitted by new and existing applicants will be ranked based on the performance of similar homeless serving projects.
- 10. All Permanent Supportive Housing Projects will be certified to have demonstrated a need in the Continuum's geographic area.
- 11. The Committee's final rankings will be submitted to the Circle of Caring Homelessness Board for a formal vote on or before December 30, 2025.
- 12. All project applicants will be notified in writing by December 30, 2025, of their project acceptance, rejection or reduction and the project's rank in Tier 1 or Tier 2.

### **Appeals Process:**

Project applicants whose project was rejected may appeal the local Continuum of Care competition decision to HUD if the project applicant believes it was denied the opportunity to participate in the local Continuum of Care planning process in a reasonable manner by submitting a Solo Application in e-snaps directly to HUD prior to the application deadline of 7:59:59 p.m. eastern time on January 14, 2026. The Continuum of Care's notification of rejection of the project in the local competition must be attached to the Solo Application. If the Continuum of Care fails to provide written notification outside of e- snaps, the Solo Applicant must attach evidence that it attempted to participate in the local Continuum of Care planning process and submitted a project application that met the local deadlines, along with a statement that the Continuum of Care did not provide the Solo Applicant written notification of the Continuum of Care rejecting the project in the local Continuum of Care competition. The appeal must be because a decision made by the Carroll County Circle of Caring Homelessness Board regarding the

ranking, rejection, or funding of their project was prejudicial, unsubstantiated by project performance, or in violation of the FY 2025 Continuum of Care Guidelines. A copy of the appeal to HUD should also be submitted to the Circle of Caring Homelessness Board via email: csteckel@carrollcountymd.gov prior to the application deadline of 7:59:59 p.m. eastern time on January 14, 2026.