



SAN MATEO COUNTY (SMC) CONTINUUM OF CARE (COC)

2025 ANNUAL COC NOTICE OF FUNDING OPPORTUNITY (NOFO) LOCAL COMPETITION

FREQUENTLY ASKED QUESTIONS

Please note: The following questions and answers were compiled based on the FY 2025 CoC NOFO that was released by HUD on November 13, 2025 and withdrawn by HUD on December 8, 2025. HUD has stated they intend to release a new NOFO. In the meantime, the withdrawn NOFO is what we have available for information. San Mateo County (SMC) will share updated information once a new NOFO is released.

1. Is it only necessary to submit in e-snaps if the project is selected to be included in CoC application to HUD?

Yes. Only applicants selected on the CoC Priority Listing will be required to submit an application in e-snaps. Projects that are not selected are not required to submit in e-snaps. Please refer to the local competition materials and the [SMC NOFO website](#) for local deadlines.

2. Will subrecipients be required to sign the certifications¹?

At this time, HUD has not provided clear direction on whether subrecipients must sign the referenced certifications. The current understanding is that regardless of the entity that signs

¹ The [2025 Annual CoC NOFO Competition Rank and Review Policy](#) States:

All funding applicants must commit to the following agreements if awarded upon execution of the grant with HUD. Submission of an application in the local competition is considered agreement to comply with these commitments:

- The project will not conduct activities that subsidize or facilitate racial preferences or other forms of illegal discrimination or conduct activities that rely on or otherwise use a definition of sex other than as binary in humans.
- The project will not operate drug injection sites or "safe consumption sites," knowingly distributes drug paraphernalia on or off property under their control, permits the use or distribution of illicit drugs on property under their control, or conducts any of these activities under the pretext of "harm reduction."

the certifications, the project as a whole must comply with all requirements referenced in the CoC NOFO, which includes compliance with any listed certifications.

3. Do we have an example of a supportive service agreement or do agencies have autonomy to create their own?

Currently, HUD has not provided an example or template of supportive services agreements and the 2025 CoC NOFO does not specify required content for supportive services agreements. Historically, agencies have been permitted to develop program-specific documents without a required template. Based on currently available information, applicants may create a program-specific supportive services agreement, unless HUD provides future guidance.

4. Do transition grants need to be submitted following the same timeframe?

Pending additional HUD guidance on how transition grants will be entered in e-snaps, applicants should assume the same operational timeline for the new transition grant as the renewal grant it is replacing.

5. How should we provide written documentation of in-house behavioral health services?

We are awaiting additional HUD guidance. For now, applicants should assume they will need to submit a commitment letter that identifies:

- The amount and source of funding being committed, and
- The services that the funding will support, even if provided by the same organization.

6. Would a Transitional Housing (TH) project previously funded by CoC but not since 2018 be considered an existing project renewal, new project application, or both?

This would be considered a new project application. To be considered a renewal application, a project must be currently receiving CoC funding and have a grant expiration date in 2026.

7. Does the program agreement need to be included with the local application or e-snaps only?

It is likely that program agreements will be required as part of the applicant's e-snaps application (at this time HUD has not released the e-snaps application). Applicants are not required to submit a program agreement during the local competition phase.



8. If an agency is applying for a new TH grant with a site-based TH model, at what point in the process would they need to have site control?

Under § 578.28 and § 578.21, programs are required to show proof of site control within 12 months of the grant award announcement. In the 2025 CoC NOFO, HUD stated that they anticipate award announcements in May 2026.

9. At what point in the application process would an applicant agency need to finalize the model (scattered site, site-based, master lease)? And are there options to submit an application listing one model and then change the model later in the process?

From what we have gathered, the safest approach is for an applicant to finalize their program model before submitting their application in the local CoC competition, and no later than the application's submission in e-snaps.

We have included our reasoning/ interpretation below:

1. The Review and Ranking panel will be reviewing applications on several criteria, including the proposed project design. As part of the project design, an applicant would need to provide a description of their proposed program model that will be assessed alongside other applications. It would be very helpful for an applicant to have a clear understanding of the model they will be using for a Transitional Housing project at the point of application in the local competition so that the Review and Ranking Panel can assess and score projects fairly.
2. When the CoC submits the consolidated application in e-snaps, they are putting forward projects for consideration of funding to HUD. Making any amendments to a project application while HUD is reviewing the CoC consolidated application is not advised.
3. After HUD awards funding and a grant agreement is signed, any change to the project design (possibly including switching models, especially if site-control becomes a factor) would require formal approval. These post-award changes must be approved by both the CoC and HUD before implementation. In this process, there is a risk that HUD would not approve any changes.

10. I understand that there would need to be a written agreement about services participation attached to a program agreement. Are there required consequences for people who participate in less than 40 hours of services per



week. If an individual participated in, say, 30 hours of programming in a given week, would the program be obligated to discharge them right away?

The 2025 CoC NOFO does not provide explicit direction on this issue. We were also unable to find regulatory language that clearly establishes how a 40-hour weekly service participation requirement must be enforced. It is reasonable to think that HUD will expect some level of enforcement. Historically, when HUD does not provide a definition, they will at least hold programs to what they committed to. If the program has a policy that indicates they will have a gradual or staggered escalation policy, then they would likely be held to whether or not they are doing that.

At this stage, it is possible that more details will become available through the grant agreement process for awarded projects and/or through e-snaps when project applications open. Historically, HUD has not outlined program policies with that level of specificity, but this NOFO introduces new expectations, so we will need to see how HUD translates this into practice.

