

## Project Rating & Ranking Policies Amendment

Northern Colorado Continuum of Care - January 9, 2026

### Purpose

This amendment serves as a general update to the Northern Colorado Continuum of Care (CoC) Program NOFO Policies & Procedures. The updates outlined below reflect changes approved by the CoC Board in response to evolving federal guidance and are intended to clarify current parameters for the local application process. These updates apply unless and until superseded by additional guidance from HUD or further action by the CoC Board.

### Summary of Updates

The following updates are effective for the current local competition:

- The maximum allowable award request has been increased to 25% of the Annual Renewal Demand (ARD)
- Tier 1 is anticipated to be set at 90% of the overall Annual Renewal Demand (ARD) for planning purposes.
- Tier 1 is no longer limited solely to Permanent Housing projects and has been expanded to include additional eligible projects.
- HMIS and Coordinated Entry projects are included in Tier 1 as part of the local competition structure.
- The local application has been reopened to accept Rapid Re-Housing (RRH) renewal project applications, consistent with current CoC Board direction and applicable HUD guidance.
- A Rapid Re-Housing (RRH) renewal scoring framework is included at the end of this amendment and applies to RRH renewal applications submitted through the reopened local competition.

### Applicability

These updates are intended to operate as a blanket clarification to the existing Policies & Procedures and do not otherwise modify adopted funding priorities, scoring methodologies, or review standards unless explicitly stated. In the event of any inconsistency between this amendment and previously adopted Policies & Procedures, this amendment shall govern.

## Rapid Rehousing (RRH) Renewal Scoring Framework

Evaluation Domain	Points	Factor	Description (What is Being Evaluated)
<b>System Performance 50 Points (50%) PSH</b>	10	Housing Move-ins	Evaluates the project's anticipated total number of housing move-ins to determine cost effectiveness
	15	Returns to Homelessness	Evaluates the percentage of project exits to homelessness
	2	Rental Assistance	Assesses applicant approach toward leveraging rental assistance to help participants achieve self-sufficiency
	15	Supportive Services	Evaluates the availability of core supportive services for housing stability
	3	Connections to Supplemental Resources	Access to non-CoC resources, including public or private sources (e.g., mainstream, health, social, and employment programs)
	5	Participation Requirement	Evaluates the project's participant expectations and how those are implemented within the service model

<b>System Contribution</b> <b>35 Points (35%)</b> <b>PSH</b>	5	Treatment/Recovery Onsite or Strong Partnership	Evaluates whether the project provides or maintains partnerships to ensure access to, treatment or recovery services
	5	Participation and Responsiveness in CES	Evaluates the project's participation in Coordinated Entry processes, including responsiveness to referrals and coordination with system partners
	5	HMIS Participation and Responsiveness	Evaluates the project's engagement with HMIS, including complete data collection
	10	System Infrastructure Requirement	Evaluates whether the project fulfills essential functions that support the operation of the CoC's homeless response system
	10	CoC Prioritization	Evaluates the extent to which the project aligns with the CoC established prioritization criteria and contributes to system-wide housing goals
<b>Data Quality</b> <b>15 Points (15%)</b> <b>PSH</b>	5	HMIS Data Quality: PII Error Rate	Evaluates the accuracy of participants Personally Identifying Information (PII) entered into HMIS
	5	HMIS Data Quality: UDE Error Rate	Evaluates the accuracy of completeness of required Universal Data Elements (UDEs) in HMIS
	5	Timeliness of Data Entry	Evaluates whether project data is entered into HMIS within the expected timeframe to support accurate and up-to-date reporting

# Project Rating & Ranking Policies and Procedures

FY25 COC NOFO  
NORTHERN COLORADO CONTINUUM OF CARE  
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## FY 2025 Program Competition

### Applicant Summary

This summary provides applicants with a clear overview of the NoCO CoC's FY 2025 Local Competition, including eligibility, local priorities, scoring, ranking, and funding amounts. All applicants must still review the full Rating & Ranking Policies and Procedures.

#### FY25 Funding Snapshot — NoCO CoC (CO-505)

(from HUD's FY25 Estimated ARD Report)

- Estimated ARD: \$1,465,718
- Tier 1 Amount (30% of ARD): \$439,715
- Tier 2 Amount: \$1,026,003
- CoC Bonus: \$441,536
- DV Bonus: \$220,768
- CoC Planning: \$110,384

These figures determine how projects will be placed in Tier 1 and Tier 2 and help applicants calibrate budget requests appropriately.

#### 1. Who Can Apply

Eligible entities include:

- Private nonprofit organizations;
- Units of general local government;
- State and local government instrumentalities;
- Public Housing Agencies (PHAs);
- Federally recognized Indian tribes; and
- Tribally designated housing entities.

Applicants must demonstrate financial capacity, organizational stability, data quality, and the ability to meet HUD CoC Program requirements.

#### 2. FY25 Local Funding Priorities (Explicit for This Competition Year)

The NoCO CoC has set clear, one-year-only priorities for the FY25 competition to maintain housing stability and protect essential system infrastructure.

## **Tier 1 — Highest Priority**

All Permanent Supportive Housing (PSH) Renewal Projects

These will be placed in Tier 1 to ensure uninterrupted permanent housing capacity and system performance.

## **Tier 2 — Prioritized at the Top**

Essential Infrastructure Projects (HMIS and CE/SSO-CE)

These projects maintain system coordination, data quality, and HUD compliance.

## **Other Eligible Projects (Ranked in score order after infrastructure projects)**

- Eligible renewal projects
- CoC Bonus
- DV Bonus
- Reallocation-based new projects
- New Transitional Housing
- New SSO-Street Outreach
- New SSO-Standalone
- Transition Grants

## **Project Types NOT Accepted for FY25**

To comply with HUD caps and local system strategy, the CoC is not accepting:

- Expansion projects
- New PSH
- New or renewal RRH
- YHDP renewals or replacement
- Joint TH-RRH

Applicants must confirm eligibility before submitting.

## **Funding Request Limits**

Individual project applications may request no less than 3% of the ARD and no more than 20% of ARD in CoC Program funds. Applications falling below the minimum or exceeding the maximum will be adjusted to meet the allowable range or deemed ineligible for full consideration.

### **3. How Projects Will Be Reviewed**

#### Step 1: Threshold Review

- CoC staff review applications for:
- Administrative completeness
- Mandatory eligibility
- Compliance with HUD and CoC guidelines

Applications that fail mandatory criteria cannot proceed.

#### Step 2: Project Scoring

Projects are scored on:

- Performance outcomes
- System alignment
- Data quality
- Budget reasonableness

#### Special FY25 Scoring Rules

- HMIS & CE automatically receive full points in the System Infrastructure Value criterion.
- PSH renewal projects receive competitive scoring support to preserve permanent housing.

#### Step 3: Ranking

Scores are averaged and combined with FY25 local priorities and funding availability to determine placement in Tier 1 or Tier 2.

### **4. Budget Reasonableness & Funding Reductions**

If total requests exceed allowable funding or violate HUD's 30% Permanent Housing cap, reductions will be applied using one of three pre-published methods:

## Reduction Methods

- Priority Path (Default): Reduces lowest-ranked eligible projects first.
- Proportional Path: Applies equal percentage reductions across eligible projects.
- Weighted Path: Reduces lower-scoring projects more heavily.

The committee documents the selected method and rationale.

## **5. Notifications to Applicants**

Applicants will receive written notice at least 15 days before HUD's submission deadline, identifying whether their project was:

- Accepted
- Reduced
- Rejected

Rejection or reduction notices include the reasons.

## **6. Appeals**

Applicants may appeal only if:

- Their project was rejected or materially reduced, and
- They can show an error of fact or a deviation from procedures.

Appeals must be submitted within 2 business days of ranking notification.

## **7. Required Reading**

Applicants must review:

- The FY25 HUD CoC Program NOFO
- The full FY25 Rating & Ranking Policies and Procedures, including appendices
- NOFO Application Backgrounder

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## 0. Definitions

The following definitions apply to terms used within this Local Competition Policies & Procedures document:

**Administrative Completeness** – The presence of all required attachments, forms, and documents necessary for an application to be considered complete. Administrative completeness does not affect eligibility or scoring and may be corrected as described in Section 3.3 when permissible.

**Essential Infrastructure Projects** – Projects critical to the functioning of the CoC, including HMIS and CES, which are required system components per 24 CFR 578.7.

**Local Competition Timeline** – The annually published schedule that identifies deadlines for the Letter of Intent, application submission, threshold review, scoring, Governing Board approval, applicant notification, appeals, and Priority Listing posting.

**Mandatory Threshold Criteria** – Required eligibility conditions established by HUD and the NoCO CoC that must be met for a project to advance to scoring. Projects that fail any mandatory threshold criterion cannot be corrected after submission and will not proceed in the competition.

**Priority Listing** – The HUD-required list that ranks all new and renewal projects in Tier 1 and Tier 2 for submission with the Consolidated Application.

**Project Application Score** – The averaged score assigned to each project based on the scoring rubric finalized annually by the Project Rating and Ranking Committee.

**Substantive Threshold Requirements** – Mandatory eligibility requirements related to HUD or CoC rules that must be met for a project to proceed to scoring, including any criteria designated as “mandatory” in the rating tool.

**Threshold Review** – The pre-scoring review conducted by CoC staff to determine whether an application meets both administrative completeness and substantive eligibility requirements.

### 0.1 Applicant Eligibility

The following entities are eligible to apply for funding under the FY 2025 CoC Program Local Competition, consistent with HUD regulations at 24 CFR 578.15 and the requirements outlined in the annual CoC Program NOFO:

- Private nonprofit organizations;
- Units of general local government;

- State and local government instrumentalities;
- Public Housing Agencies (PHAs);
- Federally recognized Indian tribes; and
- Tribally designated housing entities.

Eligible applicants must demonstrate the organizational capacity, financial management systems, and programmatic experience necessary to meet HUD CoC Program requirements and all local CoC expectations described in this document. Eligibility to apply does not guarantee a project will meet threshold requirements, receive a qualifying score, or be included in the CoC Priority Listing.

## **1. Purpose**

This document outlines the procedures for rating and ranking new and renewal projects for the FY 2025 CoC Program NOFO, consistent with HUD requirements, NoCO CoC Governance Charter, and CoC priorities.

## **2. Overview of Rating & Ranking Process**

All new and renewal project applications will be reviewed, scored, and ranked by the Project Rating and Ranking Committee using approved rating tools, scoring methodology, and CoC priorities.

### **Local Competition Timeline**

The NoCO CoC will publish the Local Competition Timeline for the current competition year as *Appendix A* to this document. The timeline will include all required deadlines for the Letter of Intent (LOI), local application submissions, threshold review, scoring, Governing Board approval, applicant notifications, and public posting of the Priority Listing.

The timeline will be posted on the NoCO CoC website and distributed through standard communication channels. If HUD issues changes to deadlines or requirements, the CoC may amend the timeline and will notify all applicants promptly. Appendix A will be updated accordingly.

### **2.1 FY 2025 Local Funding Priorities**

If HUD issues new directives, priorities, or competition requirements either outside or during the local competition, the Governing Board will review the guidance and determine whether adjustments are required to maintain compliance with federal standards. Any changes will be communicated promptly and transparently to all applicants.

For the FY 2025 CoC Program Local Competition, the NoCO CoC adopts the following funding priorities in order to align with HUD requirements, local system needs, and strategic decisions made for this competition year:

## **Tier 1 Priorities**

### **1. All Permanent Supportive Housing (PSH) Renewal Projects**

PSH renewals will be placed in Tier 1 to preserve long-standing permanent housing capacity, ensure stability of units, and maintain high-performing permanent housing inventory.

## **Tier 2 Priorities**

### **1. Essential System Infrastructure Projects (CE/SSO-CE)**

These projects are prioritized at the top of Tier 2 due to their foundational importance to system operations, federal compliance, and HUD performance outcomes.

### **2. Other Eligible New or Renewal Projects**

Placement will follow scoring results, CoC priorities, and available funding.

## **Project Types Eligible for Consideration**

The following may be submitted for FY 2025:

- Eligible renewal projects
- CoC Bonus proposals
- DV Bonus proposals
- Reallocation-based new projects (consistent with HUD rules)
- New Transitional Housing
- New Supportive Services Only – Street Outreach
- New Supportive Services Only –Standalone
- Transition Grant proposal

## **Project Types Not Accepted for FY 2025**

In keeping with local strategic decisions and to remain within HUD's annual funding caps, the NoCO CoC is **not accepting**:

- Expansion projects
- New Permanent Supportive Housing (PSH) projects
- New or renewal Rapid Rehousing (RRH) projects

- YHDP renewal or replacement projects
- Joint TH-RRH component projects

### **Purpose of Local Priority Setting**

These FY25 priorities:

- Provide clear direction to applicants
- Reinforce system performance and compliance
- Ensure stability of essential infrastructure
- Align the CoC with HUD's evolving focus areas
- Protect high-performing PSH capacity
- Support the strategic choice not to accept RRH and new PSH this year

These priorities will be applied consistently throughout scoring, ranking, and final placement on the Priority Listing.

### **Funding Request Limits**

Individual project applications may request no less than 3% of the ARD and no more than 20% of ARD in CoC Program funds. Applications falling below the minimum or exceeding the maximum will be adjusted to meet the allowable range or deemed ineligible for full consideration.

## **2.2 Letters of Intent (LOIs)**

### **LOI Submission Requirement**

Letters of Intent (LOIs) must be submitted by the deadline specified in the published competition timeline. LOIs received after the stated deadline will not be accepted.

### **Changes to submitted LOIs**

Applicants who have already submitted an LOI may request to change the listed project type only before the full local application deadline. Requests must be made in writing to the CoC Lead and will be approved only if the revised project type is eligible under HUD priorities, fits within local competition guidelines, and does not disrupt planning or create an unfair advantage.

Changes that are substantial, late, or would move the project into a funding category the applicant was not originally eligible for will not be approved. All decisions will be documented for transparency.

### **3. Application & Rating Procedures**

Due to funding cap limits and local priority decisions, for the FY 2025 local competition, the NoCO CoC is not accepting expansion projects, new permanent supportive housing projects, new or renewal rapid rehousing projects, or YHPD Renewal/Replacement projects. Only eligible renewal projects, CoC Bonus, DV Bonus and reallocation-based new projects may be submitted.

If HUD issues new directives, priorities, or competition requirements either outside or during the local competition, the Governing Board will review the guidance and determine whether adjustments are required to maintain compliance with federal standards. Any changes will be communicated promptly and transparently to all applicants.

#### **3.1 Rating Applications**

New and renewal projects must complete a project rating application reviewed by the Project Rating and Ranking Committee. Rating applications include:

- Project eligibility threshold criteria
- Project quality threshold criteria
- Compliance with HUD and CoC guidelines, including 24 CFR 578 and the 2025 NOFO
- Assessment of system outcomes and advancement of CoC performance and priorities
- Alignment with NOFO goals of treatment, recovery, self-sufficiency, and public safety

Separate rating applications have been created for new and renewal projects based on project type. Renewal project rating applications include data pulled largely from the project's most recent Annual Performance Report (APR).

#### **3.2 Submission Requirements**

Ranking Applications must be submitted by the published local competition deadline. Late submissions will not be accepted under any circumstances.

The CoC may allow applicants to address minor administrative corrections after the deadline. This does not apply to applications missing required core components. Substantively incomplete applications will not move forward.

Administrative corrections may not alter scoring, eligibility, or substantive content per HUD threshold requirements.

Applicants are responsible for ensuring all calculations, client counts, and narrative responses are accurate at the time of submission. The CoC will not adjust scoring based on errors identified after the deadline.

### 3.3 Administrative & Threshold Review

CoC staff will conduct the initial threshold eligibility review for all new and renewal applications prior to scoring. The threshold review includes both an administrative completeness check and a substantive eligibility review according to HUD criteria and local CoC priorities.

During the administrative completeness check, applications that are missing administrative documents (e.g., required attachments) may be given a short deadline to provide the missing items only if the deficiency does not affect eligibility or the ability to assess threshold criteria.

Administrative corrections are permitted only when they do not alter the substance of the application and do not impact the published competition timeline.

During the substantive threshold review, applications that fail mandatory eligibility criteria – including any criteria designated as mandatory in the rating tool – will not be permitted to make modifications. Applications failing substantive threshold requirements will be forwarded to the Governing Board Executive Committee for a determination as to whether the project application may proceed in the competition or must be removed. The Governing Board Executive Committee may request additional documentation only to verify eligibility – not to allow application improvements.

Applications that meet threshold eligibility requirements will proceed to scoring.

### 3.4 Project Rating and Ranking Committee Composition & Conflict of Interest

The Project Rating and Ranking Committee consists of members of the NoCO CoC.

All members must sign a Conflict of Interest Agreement annually and notify CoC staff at any time during the year if updates are required. Per the NoCO CoC Governance Charter, a conflict of interest may occur when a committee member's personal, professional, or financial interests could compromise - or appear to compromise - their objectivity or ability to act in the best interest of the CoC, including when the member is affiliated with an agency submitting a project application.

The Project Rating and Ranking Committee operates year-round; however, members affiliated with any applying agency will recuse themselves from all scoring, discussions, and decision-making activities during the active NOFO competition to maintain objectivity and avoid conflicts of interest.

Recusals will be documented in the committee meeting minutes to ensure transparency and accountability.

### 3.5 Scoring Responsibilities

Each rating application receives a project application score evaluating how the project advances system outcomes and aligns with CoC priorities.

- The Project Rating and Ranking Committee members independently review and score all narrative, qualitative, and performance-related sections of each project application.
- CoC staff will complete the scoring of the system contribution components (HMIS and CAHPS engagement) to ensure accuracy and consistency. These staff-entered scores will be provided to the Project Rating and Ranking Committee for review and validation. Any committee member may request clarification or documentation supporting staff-entered scores.
- The committee retains full authority over the final project application score.

Committee members will participate in an annual scoring orientation conducted by CoC Staff to ensure consistent application of the scoring criteria and to promote fair and objective review.

Individual committee member scores, notes, and deliberations are confidential within the committee and will not be shared publicly or with applicants. Only final averaged scores will be shared upon request; individual reviewer scores will not be shared. Ranking outcomes for Priority Listing will be published.

### 3.6 Finalizing Rating & Scoring Methodology

The Project Rating and Ranking Committee reviews the rating process and scoring methodology annually. CoC staff finalize the application and scoring methodology based on committee input. Project applications and scoring rubrics are then distributed for independent scoring.

After scoring is completed, scores are averaged, and the committee meets to finalize ranking recommendations for submission to the Governing Board for approval.

### 3.7 Publication of Application Materials & Scoring Methodology

The CoC will publish the final project rating application and scoring methodology on the NoCO CoC website and through standard CoC communication channels prior to applicants submitting ranking applications. Publication ensures transparency, provides applicants adequate time to review materials, and aligns with HUD expectations for an open and fair competition. Should HUD release any clarifications or changes, or if local modifications become necessary, the CoC will update the published materials accordingly and notify all applicants promptly.

HUD-derived performance measures and system indicators used for scoring must meet established data quality thresholds, defined annually by the HMIS Lead and published as part of the competition materials.

### 3.8 Scoring Tool Transparency and Priority-Setting

The NoCO CoC is committed to ensuring a fair, objective, and transparent scoring process. The scoring tool is intentionally designed to reflect CoC system priorities, HUD expectations, and local operational needs, including the preservation of high-performing permanent supportive housing (PSH) projects—sites that largely serve people with disabling conditions—and the stability of essential system infrastructure such as HMIS and Coordinated Entry (CE/SSO-CE).

The NoCO CoC will ensure that the scoring tool reflects HUD’s annual policy priorities as outlined in the NOFO. These federal priorities will be incorporated into the scoring tool through performance measures, system-alignment criteria, and narrative components. Each year, the Rating & Ranking Committee will update the scoring tool to ensure alignment with local priorities, HUD’s stated priorities and the requirements of the current NOFO.

To support transparency and trust in the local competition, the scoring tool will clearly identify:

- The total points available;
- The distribution of points across narrative, performance measures, and system-alignment categories;
- Any weighting that reflects the critical role certain project types play in system operations or in reducing homelessness within the region.

#### **Priority Treatment of Essential System Infrastructure**

The CoC recognizes that HMIS and CES projects are foundational to compliance, coordinated system function, and the performance outcomes evaluated annually by HUD. To reflect this essential role, the scoring tool includes a defined System Infrastructure Value criterion.

This approach ensures that HMIS and CE projects remain competitively positioned within the ranking process—particularly within Tier 2—while maintaining objective scoring across all other criteria and providing clear, public justification for this prioritization.

#### **Priority Treatment of High-Performing PSH Renewals**

The scoring tool also incorporates weighting or point distribution that supports the competitive positioning of PSH renewal projects. This reflects HUD’s continued emphasis on permanent

housing and the CoC's commitment to preserving high-performing units that directly reduce homelessness.

### **Transparency and Public Disclosure**

Point allocations, weighting decisions, and the System Infrastructure Value criterion will be:

- Published in advance of the local competition,
- Included in materials provided to applicants, and
- Presented alongside the scoring tool used in the rating and ranking process.

This ensures all applicants understand how scores are determined, how CoC priorities are incorporated, and how infrastructure and permanent housing projects are elevated in a fair and consistent manner.

### **Annual Review**

The Rating & Ranking Committee will review the scoring tool-including weighting, prioritization factors, and the System Infrastructure Value criterion-on an annual basis during the NOFO application cycle to ensure alignment with HUD requirements, performance trends, and evolving CoC system needs.

## **3.9 Reallocation**

The NoCO CoC may use reallocation as a strategy to improve system performance, strengthen compliance, and ensure alignment with HUD and CoC priorities. Each year, renewal projects will be evaluated for reallocation consideration during the rating and ranking process. Reallocation decisions are made as part of the annual NOFO Rating & Ranking process and finalized through the Priority Listing submitted to HUD. Reallocation consideration is triggered when one or more of the following conditions are identified related to a renewal project:

Reallocation may occur when a renewal project:

- Scores significantly below other renewal projects or below minimum performance expectations established in the annual scoring rubric;
- Demonstrates persistent performance concerns related to housing outcomes, utilization, project management, or client safety;
- Exhibits repeated data quality or compliance issues that have not been resolved despite technical assistance;
- Has significant unspent funds or is unable to reasonably expend its full grant amount;
- Voluntarily relinquishes or reduces funding or indicates an inability to continue operating under CoC Program requirements; or

- No longer aligns with HUD or CoC priorities, including project types that the CoC elects not to support in a given competition year.

The Project Rating and Ranking Committee will review all projects meeting any of these conditions and may recommend full or partial reallocation. Final reallocation recommendations will be formally documented and require approval by the Governing Board.

Placement below the funding line is not reallocation.

Reallocated funds may be used to create new projects through the CoC Bonus, DV Bonus, or reallocation-based new projects, consistent with HUD requirements. Applicants will be notified of reallocation decisions at least 15 days prior to the CoC Program application submission deadline.

## **4. Ranking Procedures**

### **4.1 HUD Tier Structure and Requirements**

HUD requires CoCs to rank projects in two tiers:

#### **HUD Tier 1 Requirements**

Tier 1 is equal to 30 percent of the CoC's Annual Renewal Demand (ARD). HUD will conditionally select project applications in Tier 1 from the highest scoring CoC application to the lowest scoring CoC application and according to the rank assigned by the CoC on the CoC Priority listing, provided the project applications pass both project eligibility and project quality threshold review, and if applicable, project renewal threshold.

Any competitively ranked project may be placed in Tier 1 according to the CoC's local rating and ranking process and based on local needs and priorities.

#### **HUD Tier 2 Requirements**

Tier 2 is the difference between Tier 1 and the sum of each CoC's ARD, CoC Bonus, and DV Bonus. HUD will evaluate project applications placed in Tier 2 for project eligibility and project quality threshold requirements and project renewal threshold requirements, if applicable; and HUD will determine funding using the CoC Application score as well as the CoC project ranking.

#### **HUD Tier 2 Scoring (100-Point System)**

HUD will award a point value to each ranked new and renewal project application that is in Tier 2 using a 100-point scale, and conditionally select applications in Tier 2 using this point value from the highest scoring project application to the lowest:

1. CoC Score. Up to 50 points in direct proportion to the score received on the CoC Application, e.g., if a CoC received 65 out of 130 points on the CoC Application, the project application would receive 25 out of 50 points for this criterion.
2. CoC Project Ranking. Up to 40 points for the CoC's ranking of the project application(s). To consider the CoCs ranking of projects, HUD will assign point values directly related to the CoCs' ranking of project applications. The calculation of point values will be 40 times the quantity  $(1-x)$  where  $x$  is the ratio of the cumulative funding requests for all projects or portions of projects ranked higher by the CoC in Tier 2 plus one half of the funding of the project of interest to the total amount of funding available in Tier 2 for the CoC.
3. Service Participation. Up to 10 points for projects that have or will incorporate supportive service participation requirements in their program design, based on individual need and evidenced in an occupancy agreement or equivalent document.

All new and renewal projects, except CoC Planning, must be ranked.

## 4.2 HUD Permanent Housing Cap

HUD requires each CoC to cap at 30% the amount of its Annual Renewal Demand (ARD) allocated to permanent housing. This includes Permanent Supportive Housing (PSH), Rapid Rehousing (RRH), and Joint Transitional Housing-Rapid Rehousing component projects (TH-RRH).

## 4.3 Ranking Methodology

Projects will be ranked based on the percentage of points earned out of 100 points, accounting for CoC and HUD priorities.

If the combined requests of renewal and new projects exceed the NoCO CoC's annual funding allocation, the CoC will rank projects in accordance with their final score and CoC priorities until the available funding is exhausted. Projects that fall below the funding line will not be ranked or included in the CoC's Priority Listing. These projects are not selected for submission and will receive written notification with the reason for non-selection, consistent with HUD regulations.

Placement below the funding line is not considered reallocation and does not generate funds for other projects.

## **Budget Reasonableness and Funding Amount Determination**

The Rating & Ranking Committee will evaluate the reasonableness of each project's budget request in relation to program design, historical expenditures, cost-effectiveness, and alignment with CoC priorities. Projects requesting funding amounts that are disproportionate, unsupported, or operationally infeasible may:

- fail mandatory threshold review,
- receive reduced points under the scoring rubric, resulting in a reduced recommended award amount, or
- receive partial funding based on ranking order and the availability of funds above the funding line.

The committee may recommend partial funding, full funding, or reallocation in accordance with HUD requirements and local priorities.

## **Project Award Funding**

The CoC will not recommend funding amounts less than 3% of the ARD and no more than 20% of ARD in CoC Program funds. Applications falling below the minimum or exceeding the maximum will be adjusted to meet the allowable range or deemed ineligible for full consideration.

## **Reduction Determination Method (procedures in Appendix B)**

When funding reductions are required due to the Permanent Housing cap or ARD limit, the Rating & Ranking Committee will apply one of the following three reduction methods. The methods will be considered in order, and the Committee will select the first method that results in a fair, HUD-compliant, and performance-aligned funding distribution.

### **1. Priority Path (Default Method)**

Reductions are applied first to the lowest-ranked, lowest-scoring, or least system-aligned projects until the required amount is achieved.

### **2. Proportional Path**

If the Priority Path would result in material inequity or jeopardize high-performing or essential projects, the Committee will apply an equal percentage reduction across all eligible projects.

### **3. Weighted Path**

If a proportional reduction would allow lower-scoring projects to retain disproportionately high funding compared to higher-scoring projects, the Committee will apply a weighted reduction formula that reduces lower-scoring projects more heavily.

The Committee will document which method was used and why, ensuring transparency, fairness, and adherence to HUD requirements.

## 4.4 Bonus Funds

For the 2025 CoC Program Annual Competition, CoC Bonus and DV Bonus funds are available. CoC Bonus project(s) will be ranked above any projects applying for DV Bonus funds.

## 4.5 Projects Essential to CoC Infrastructure

Essential infrastructure projects - such as HMIS and CE/SSO-CE - will be positioned at the top of Tier 2 to ensure strong consideration during the local ranking and review process. These projects remain critical to system operations and coordination across the CoC and will receive priority placement within Tier 2 accordingly.

Essential infrastructure projects must still meet all performance expectations, data quality standards, and scoring requirements applicable to all applicants.

## 4.6 CoC Planning Grant

The CoC Planning Grant is not scored or ranked but will be included in the Consolidated Application if it meets eligibility and quality threshold criteria.

## 4.7 Tie-Breaker Rules

If two or more projects receive identical final averaged scores, the following tie-breakers will be applied in order:

1. Essential Infrastructure Priority  
Projects critical to CoC operations (HMIS, CES) receive priority.
2. Higher System Performance Impact  
Projects with higher performance on system-impact measures (e.g., exits to permanent housing, reduced length of time homeless).
3. Better Data Quality  
Higher HMIS data completeness and accuracy scores.
4. Cost Effectiveness  
Lower cost per permanent housing placement or per household served.

5. If all tie-breakers fail:

A final determination will be made by the Project Rating and Ranking Committee in a documented vote, ensuring recusal rules are followed.

## **5. Governing Board Review & Notifications**

### **5.1 Priority Listing Submission**

The Project Rating and Ranking Committee will compile the completed ranking, with Tiers 1 and 2 clearly identified into a Priority Listing. The Priority Listing will be forwarded to the NoCO CoC Governing Board for review and approval.

Governing Board review and approval must occur early enough to allow the 15-day applicant notification requirement as outlined in the FY2025 NOFO.

### **5.2 Notification to Applicants**

Project applicants will be informed whether their project was accepted, reduced, or rejected at least 15 days prior to the NOFO submission deadline.

Applicants receiving a rejection or reduction will receive written notice including the reason(s) for the decision.

### **5.3 Public Posting of Priority Listing**

The final Priority Listing will be publicly posted on the NoCO CoC website in the format required by HUD by the required deadline.

### **5.4 General Inquiries and Non-Appealable Issues**

Applicants may submit general inquiries or clarification questions regarding scoring or threshold results to CoC staff. These inquiries will be handled administratively and are not considered formal appeals. Only issues meeting the criteria in Section 6 are eligible for a formal appeal.

## **6. Appeals Procedure**

### **6.1 Grounds for Appeal**

An applicant may appeal to the Governing Board Executive Committee only if:

- The project was rejected or placed at significant risk of funding reduction; and
- The applicant demonstrates that the rating/ranking process either:
  - Did not follow NoCO CoC procedures, or
  - Included errors of fact rather than judgment by the committee.

### **6.2 Appeal Submission Requirements**

Appeals must be submitted within 2 business days of being notified of their rank on the Priority Listing.

Appeals must be sent to [contact@nocococ.org](mailto:contact@nocococ.org) by the end of business on the 2<sup>nd</sup> day and/must:

- Be in writing
- Identify the error(s)
- Provide supporting evidence
- State the remedy requested

### **6.3 Appeal Review Timeline**

Valid appeals will be reviewed by the CoC Governing Board Executive Committee, and a final decision will be made within 2 business days of appeal submission. Governing Board Executive Committee decisions are final and cannot be further appealed within the CoC.

## 7. Appendices

### Appendix A – FY25 Local Competition Timeline

The Timeline will be updated and published separately once HUD releases the FY 2025 CoC Program NOFO and all local deadlines are finalized. Applicants will be notified of any timeline changes in writing, and the most current version will be posted on the NoCO CoC website.

Because of this year's significant changes and the compressed timeline, here are the key dates to know:

- 11/13/25 – NOFO Released
- 12/01/25 – Letters of Intent Due
- 12/04/25 – Local Competition Applicant Training (Zoom at 3pm)
- 12/11/25 – Narrative Assistance Session (Zoom at 1pm)
- 12/15/25 – Local Ranking Applications Due
- 12/30/25 – Agencies Notified of Ranking / Priority Listing
- 01/02/26 – Appeals Due
- 01/06/26 – Appeal Decisions Made; Consolidated Application posted for public review
- 01/07/26 - Project Applications Due in e-snaps
- 01/12/26 – Revisions due in e-snaps
- 01/13/26 – Consolidated Application Submitted to HUD

## Appendix B – Reduction Procedures

### Funding Reduction Procedures

This section outlines the procedures the NoCO CoC will use to determine funding reductions when total requested amounts exceed the Annual Renewal Demand (ARD) or when Permanent Housing (PH) requests exceed HUD's 30% PH cap. Reductions are applied only after all projects have been scored and ranked according to the published scoring tool.

#### 1. Identify Funding Gaps

##### 1.1 Calculate the ARD Gap.

If the total amount requested for all Tier 1 and Tier 2 projects exceeds the CoC's ARD, determine the shortfall.

##### 1.2 Calculate the Permanent Housing (PH) Gap.

If the total amount requested for all PH projects (PSH, RRH, Joint TH/RRH) exceeds 30% of the ARD, determine the amount required to bring PH within the HUD cap.

##### 1.3 If no gaps exist, full funding is recommended for all projects consistent with their ranking.

#### 2. Determine Eligible Projects for Reduction

##### 2.1 Tier 1 PSH Projects:

Eligible for reduction only to achieve compliance with the PH cap.

##### 2.2 HMIS and CES Projects:

Classified as essential infrastructure and not eligible for reduction unless required by HUD rule.

##### 2.3 Other Tier 2 Projects (TH, SO, SSO, etc.):

Eligible for reduction to resolve the ARD Gap.

##### 2.4 DV Bonus Projects:

Evaluated separately and do not affect ARD or PH calculations.

#### 3. Establish the Reduction Amounts

### 3.1 Reduction Required for PH Cap:

PH Gap = Total PH Request – PH Limit (30% of ARD)

### 3.2 Reduction Required for ARD Limit:

ARD Gap = Total Request – ARD

3.3 The total required reduction is the amount needed to eliminate either or both gaps.

## 4. Reduction Method Selection Framework

The Rating & Ranking Committee will consider the three reduction methods in the order listed below and will select the first method that results in a fair, HUD-compliant, and performance-aligned funding distribution.

### 5. Method 1 — Priority Path (Default Method)

5.1 Apply reductions to the lowest-ranked, lowest-scoring, or least system-aligned eligible projects first.

5.2 Continue reductions until the PH Gap and/or ARD Gap is resolved.

5.3 If applying reductions to the lowest-ranked projects would:

- create material inequity,
- jeopardize essential or high-performing projects, or
- leave the system noncompliant with HUD caps,
- then proceed to Method 2.

### 6. Method 2 — Proportional Path

6.1 Apply an equal percentage reduction across all eligible projects.

6.2 The proportional reduction percentage is calculated as:

Reduction % = Required Reduction ÷ Sum of Requested Budgets of Eligible Projects

6.3 The new recommended award for each project is:

Adjusted Award = Original Request × (1 – Reduction %)

6.4 If a proportional reduction would result in lower-scoring projects retaining disproportionately high funding compared to higher-scoring projects, proceed to Method 3.

## 7. Method 3 — Weighted Path

7.1 Apply a performance-weighted reduction so that lower-ranked projects receive deeper cuts.

7.2 The weight for each project is calculated as:

Weight = (Maximum Score – Project Score)

7.3 Each project's reduction amount is:

Project Reduction = (Project Weight ÷ Total Weight of Eligible Projects) × Required Reduction

7.4 Subtract the reduction amount from each project's request to determine the adjusted award.

## 8. Documentation and Decision Reporting

8.1 The Committee must document:

- The method selected (Priority, Proportional, or Weighted)
- The rationale for selecting that method
- The amounts reduced from each project
- The final recommended award amounts
- Confirmation of compliance with the ARD limit and PH cap

8.2 The Committee's recommendations will be presented to the Governing Board for review and approval.

8.3 The CoC will notify applicants of their final award recommendations and provide the appeals process consistent with Section 6 of this policy.

## Appendix C – Project Rating Factors and Scoring Framework

### Renewal Project Rating Factors – Permanent Supportive Housing

#### Permanent Supportive Housing (PSH)

Evaluation Domain	Points	Factor	Description (What is Being Evaluated)
<b>System Performance 50 Points (50%) PSH</b>	15	Returns to Homelessness	Evaluates the percentage of project exits to homelessness
	15	Supportive Services Type/Frequency (Matrix)	Evaluates the availability of core supportive services for housing stability
	10	Inventory Number of Beds/Units	Evaluates scale and cost-effectiveness of the project by unit cost
	3	Connections to Supplemental Resources	Assess to non-CoC resources, including public or private sources (e.g., mainstream, health, social, and employment programs)
	5	Participation Requirement	Evaluates the project's participant expectations and how those are implemented within the service model
	2	Serving Specific Population	Evaluates alignment between project design and target population
<b>System Contribution 35 Points (35%) PSH</b>	5	Treatment/Recovery Onsite or Strong Partnership	Evaluates whether the project provides, or maintains partnerships to ensure access to, treatment or recovery services
	5	Participation and Responsiveness in CES	Evaluates the project's participation in Coordinated Entry processes, including responsiveness to referrals and coordination with system partners
	5	HMIS Participation and Responsiveness	Evaluates the project's engagement with HMIS, including complete data collection
	10	System Infrastructure Requirement	Evaluates whether the project fulfills essential functions that support the operation of the CoC's homeless response system
	10	CoC Prioritization	Evaluates the extent to which the project aligns with the CoC established prioritization criteria and contributes to system-wide housing goals
<b>Data Quality 15 Points (15%) PSH</b>	5	HMIS Data Quality: PII Error Rate	Evaluates the accuracy of participants Personally Identifying Information (PII) entered into HMIS
	5	HMIS Data Quality: UDE Error Rate	Evaluates the accuracy of completeness of required Universal Data Elements (UDEs) in HMIS
	5	Timeliness of Data Entry	Evaluates whether project data is entered into HMIS within the expected

			timeframe to support accurate and up-to-date reporting
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## Renewal Project Rating Factors – Homeless Management Information System

### Homeless Management Information System (HMIS)

Evaluation Domain	Points	Factor	Description (What is Being Evaluated)
<b>System Performance</b> <b>50 points (50%)</b> <b>HMIS</b>	15	Proactive Case Management Tool that promotes Treatment and Recovery	Evaluates whether HMIS includes or supports tools that enhance case management functions, support treatment and recovery workflows and improve participants outcomes
	10	Tracks Returns to Homelessness	Evaluates whether HMIS Lead provides functionality that enables the CoC to monitor returns to homelessness
	10	Collects UIDs Data Standards	Evaluates the system's ability to collect and store all required unique identifiers and data standards consistent with HUD HMIS requirements
	15	Produces all HUD required reports and provides data needed for HUD reporting	Evaluates whether the HMIS Lead consistently produces all HUD required reports and supplies accurate, timely data needed for federal and local reporting
<b>System Contribution</b> <b>35 Points (35%)</b>	5	Treatment/Recovery Onsite or Strong Partnership	Evaluates whether the project provides, or maintains partnerships to ensure access to, treatment or recovery services
	5	Participation and Responsiveness in CES	Evaluates the project's participation in Coordinated Entry processes, including responsiveness to referrals and coordination with system partners
	5	HMIS Participation and Responsiveness	Evaluates the project's engagement with HMIS, including complete data collection
	10	System Infrastructure Requirement	Evaluates whether the project fulfills essential functions that support the operation of the CoC's homeless response system
	10	CoC Prioritization	Evaluates the extent to which the project aligns with the CoC established prioritization criteria and contributes to system-wide housing goals
<b>Data Quality</b> <b>15 Points</b> <b>HMIS</b>	15	Data Quality Procedures	Evaluates whether the project has established and follows clear data quality procedures that support

			accurate, consistent, and reliable information within HMIS
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## Renewal Project Rating Factors – Supportive Services Only – Coordinated Entry Services

### Supportive Services Only - Coordinated Entry System (SSO-CES)

Evaluation Domain	Points	Factor	Description (What is Being Evaluated)
<b>System Performance</b> 50 points (50%) <b>SSO – CES</b>	15	Coordinated Entry System is easily accessible	Evaluates the extent to which the CES project ensures that access points and processes are available, reachable, and usable for all people experiencing homelessness seeking assistance
	15	Designed to reach households experiencing homelessness with the highest needs	Evaluates whether the CES process prioritizes and effectively engages individuals and families with the most sever needs
	10	Standardized Assessment Process	Evaluates whether the project implements consistent and standardized assessment procedures across access points in alignment with CES policies
	10	Referral and Matching	Evaluates the effectiveness and consistency of referral and matching processes to ensure participants are connected to housing and services appropriate to their needs
<b>System Contribution</b> 35 Points (35%) <b>SSO - CES</b>	5	Treatment/Recovery Onsite or Strong Partnership	Evaluates whether the project provides, or maintains partnerships to ensure access to, treatment or recovery services
	5	Participation and Responsiveness in CES	Evaluates the project's participation in Coordinated Entry processes, including responsiveness to referrals and coordination with system partners
	5	HMIS Participation and Responsiveness	Evaluates the project's engagement with HMIS, including complete data collection
	10	System Infrastructure Requirement	Evaluates whether the project fulfills essential functions that support the operation of the CoC's homeless response system
	10	CoC Prioritization	Evaluates the extent to which the project aligns with the CoC established prioritization criteria and contributes to system-wide housing goals
<b>Data Quality</b> <b>15 Points (15%)</b>	15	Data Quality Procedures	Evaluates whether the project has established and follows clear data quality

SSO - CES			procedures that support accurate, consistent, and reliable information within HMIS
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## New Project Rating Factors – Transitional Housing

### Transitional Housing (TH)

Evaluation Domain	Points	Factor	Description (What is Being Evaluated)
<b>System Performance</b> <b>50 Points (50%)</b> <b>TH</b>	15	Returns to Homelessness	Evaluates the percentage of project exits to homelessness
	10	Exits to Permanent Housing	Evaluates the rate at which participants transition from the project to permanent housing without needed continued support
	10	Length of Stay	Evaluates whether the project supports timely transitions to housing, consistent with goals for efficient program flow and participant progress
	10	Supportive Services Type/Frequency (Matrix)	Evaluates the availability of core supportive services for housing stability and efforts to ensure self-sufficiency
	5	Participation Requirement	Evaluates the project's participant expectations and how those are implemented within the service model
<b>System Contribution</b> <b>35 Points (35%)</b> <b>TH</b>	5	Treatment/Recovery Onsite or Strong Partnership	Evaluates whether the project provides, or maintains partnerships to ensure access to, treatment or recovery services
	5	Participation and Responsiveness in CES	Evaluates the project's participation in Coordinated Entry processes, including responsiveness to referrals and coordination with system partners
	5	Inventory Number of Beds/Units	Evaluates scale and cost-effectiveness of the project by unit cost
	10	System Infrastructure Requirement	Evaluates whether the project fulfills essential functions that support the operation of the CoC's homeless response system
	10	CoC Prioritization	Evaluates the extent to which the project aligns with the CoC established prioritization criteria and contributes to system-wide housing goals
<b>Data Quality</b> <b>15 Points (15%)</b> <b>TH</b>	15	HMIS Readiness	Evaluates the project's readiness and capacity to fully participate in HMIS or an HMIS comparable database (for DV projects).

## New Project Rating Factors – Supportive Services Only – Street Outreach

### Supportive Services Only – Street Outreach (SSO-SO)

Evaluation Domain	Points	Factor	Description (What is Being Evaluated)
<b>System Performance</b> <b>50 Points (50%)</b> <b>SSO-SO</b>	15	Unsheltered Engagement Rate	Evaluates the project's effectiveness in identifying, engaging, and consistently working with individuals experiencing unsheltered homelessness
	10	Connections to Emergency Shelter	Evaluates how effectively the project connects unsheltered individuals to emergency shelter, including timeliness of connections and strategies used to support access.
	15	Supportive Services Type/Frequency (Matrix)	Evaluates the availability of core supportive services for housing stability and efforts to ensure self-sufficiency
	5	Participation Required	Evaluates the project's participant expectations and how those are implemented within the service model
	5	Strategy for reducing Encampments	Evaluates whether the project has an active strategy to address and reduce encampment related homelessness in coordination with system partners
<b>System Contribution</b> <b>35 Points (35%)</b> <b>SSO-SO</b>	5	Diversion/Housing Problem Solving	Evaluates whether the project has an established workflow for supporting diversion or housing problem-solving at first contact including identification of safe alternatives and problem-solving practices
	5	Participation and Responsiveness in CES	Evaluates the project's participation in Coordinated Entry processes, including responsiveness to referrals and coordination with system partners
	5	Partnerships with First Responders & Crisis Systems	Evaluates the project's collaboration with first responders, mobile crisis teams, and related partners to support safety, engagement, and crisis response.
	10	System Infrastructure Requirement	Evaluates whether the project fulfills essential functions that support the operation of the CoC's homeless response system
	10	CoC Prioritization	Evaluates the extent to which the project aligns with the CoC established prioritization criteria and contributes to system-wide housing goals
<b>Data Quality</b> <b>15 Points (15%)</b> <b>SSO-SO</b>	15	HMIS Readiness	Evaluates the project's readiness and capacity to fully participate in HMIS or an HMIS comparable database (for DV projects).

## New Project Rating Factors – Supportive Services Only - Standalone

### Supportive Services Only (SSO) - Standalone

Evaluation Domain	Points	Factor	Description (What is Being Evaluated)
<b>System Performance</b> <b>50 Points (50%)</b> <b>SSO-Standalone</b>	25	Service Engagement Frequency/ Matrix	Evaluates the availability of core supportive services for housing stability and efforts to ensure self-sufficiency
	15	Unsheltered Engagement Rate	Evaluates the project's effectiveness in identifying, engaging, and consistently working with individuals experiencing unsheltered homelessness
	5	Participation Required	Evaluates the project's participant expectations and how those are implemented within the service model
	5	Annual Assessment of Service needs	Evaluates the project's participant expectations and how those are implemented within the service model
<b>System Contribution</b> <b>35 Points (35%)</b> <b>SSO-Standalone</b>	5	Diversion/Housing Problem Solving	Evaluates whether the project has an established workflow for supporting diversion or housing problem-solving at first contact including identification of safe alternatives and problem-solving practices
	5	Participation and Responsiveness in CES	Evaluates the project's participation in Coordinated Entry processes, including responsiveness to referrals and coordination with system partners
	5	Partnerships with First Responders & Crisis Systems	Evaluates the project's collaboration with first responders, mobile crisis teams, and related partners to support safety, engagement, and crisis response.
	10	System Infrastructure Requirement	Evaluates whether the project fulfills essential functions that support the operation of the CoC's homeless response system
	10	CoC Prioritization	Evaluates the extent to which the project aligns with the CoC established prioritization criteria and contributes to system-wide housing goals
<b>Data Quality</b> <b>15 Points (15%)</b> <b>SSO-Standalone</b>	15	HMIS Readiness	Evaluates the project's readiness and capacity to fully participate in HMIS or an HMIS comparable database (for DV projects).