

## FY25 CoC Builds Local Competition Policies and Procedures

*Approved by OPH Executive Committee May 23, 2025*

Our Path Home (OPH), the Boise City/Ada County Continuum of Care (CoC) ID-500, is requesting project applications for up to \$6,000,000 for the development, acquisition, or rehabilitation of new PSH units as part of the CoC Builds Competition.

All information about the Local Competition can be found at:

<https://www.ourpathhome.org/fund/coc-builds/>

### Overview

On May 16, 2025, the Department of Housing and Urban Development (HUD) posted the [Continuum of Care Builds \(CoC Builds\) Notice of Funding Opportunity \(NOFO\)](#). The NOFO targets efforts within CoC geographic areas to address and reduce the number of individuals and families experiencing homelessness by adding new units of permanent supportive housing (PSH) through new construction, acquisition, or rehabilitation under the CoC Program.

Through this NOFO, HUD encourages CoCs to leverage funds provided for capital costs of new PSH units with other funding sources to maximize the amount of housing that can be created. PSH is permanent supportive housing that also provides supportive services to assist individuals and families experiencing homelessness, where at least one household member has a disability that substantially impedes their ability to live independently.

### HUD CoC Builds Materials:

- [CoC Builds Page](#)
- [FY25 CoC Builds NOFO](#)
- [FY25 CoC Builds FAQ](#)
- [e-snaps](#) (application submission platform from HUD)
- [Checklist to Get Started](#) (e-snaps guide from HUD)

Subscribe to [HUD exchange](#) and the [Our Path Home newsletter](#) for updates.

### Grant Terms

*Estimated Period of Performance: 10/01/2025 through 09/30/2025*

Terms may be two, three, four, or five years. Projects selected for conditional award must be able to:

- provide proof of site control (24 CFR 578.25) prior to execution of the grant agreement
- demonstrate, prior to grant agreement execution, that the project is financially feasible (24 CFR 578.21(c); see Section III.G of this NOFO for more information); and
- execute the grant agreement with HUD within the time frame permitted.

Additionally, projects selected for conditional award must:

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- have a completed environmental review before awarded funds can be drawn for project activities;
- complete a subsidy layering review (SLR) in accordance with 24 CFR 578.29 and Section III.G of this NOFO; and
- meet the timeliness standards outlined in 24 CFR 578.85 for new construction or rehabilitation activities.

Project applicants should select the grant term based on the type of capital costs project you are submitting and the realistic time frame for completion. Generally, rehabilitation and acquisition time frames are less than new construction. See 24 CFR 578.85 for timeliness requirements related to new construction and rehabilitation projects.

### Eligible Applicants

Under this CoC Builds NOFO, Collaborative Applicants must submit applications on behalf of Project Applicants through e-snaps. Project Applications may include multiple project sites and multiple subrecipients. However, only one application per CoC may be submitted via a CoC Priority Listing.

Eligible Project Applicants include:

- State governments
- County governments
- City or township governments
- Special district governments
- Native American tribal governments (Federally recognized)
- Public housing authorities/Indian housing authorities)
- Native American tribal organizations (other than Federally recognized tribal governments)
- Nonprofits having a 501(c)(3) status with the IRS, other than institutions of higher education
- Others: Faith-based organizations may apply on the same basis as any other organization. HUD does not engage in any unlawful and improper conduct, policies, or practices that target faith-based organizations. Individuals are ineligible applicants.

### Eligible Costs

The project application is available in e-snaps and includes the budget forms available under this NOFO. Project Applicants must complete the application budget forms for their proposed project. There is a section included to capture indirect cost rate if needed. Project Applicants will select the appropriate budget form(s) based on your requested activities.

1. **Project Applications will include the following budgets, and project applicants will select the applicable budget(s) for their funding request:**

- a. **Capital Costs -**

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- New Construction (24 CFR 578.47);
  - Acquisition (24 CFR 578.43); and
  - Rehabilitation (24 CFR 578.45).
- b. **Other Eligible CoC Program Costs** - No more than 20 percent of the total request, where project applicants will select the applicable budget(s) for their non-capital costs:
- Project-based rental assistance (24 CFR 578.51(e)) where the unit sizes and current FMRs are prepopulated;
  - Operating (24 CFR 578.55);
  - Supportive Services (24 CFR 578.53);
  - HMIS (24 CFR 578.57);
  - VAWA eligible costs (42 USC 11383(a)(13));
  - Rural eligible costs (42 USC 11383(a)(13)); and
  - Relocation costs (24 CFR 578.61)
- c. **Administrative costs (24 CFR 578.59)** - No more than 10 percent of the total request.
2. **VAWA Costs Information:** Section 605(a)(2) of VAWA 2022 amended section 423(a) of the McKinney-Vento Homeless Assistance Act to add the following eligible activity to the CoC program: “Facilitating and coordinating activities to ensure compliance with the emergency transfer plan requirement in [34 U.S.C. 12491(e)] and monitoring compliance with the confidentiality protections in [34 U.S.C. 12491(c)(4)].”

## Project Applications

Project Applicants must submit a project using [e-snaps](#), export a copy of the completed application as a PDF, and send it to [info@ourpathhome.org](mailto:info@ourpathhome.org) by June 13, 2025.

### E-snaps

Project applicants that have not used e-snaps before will need to create and complete the Project Applicant Profile information. See the [Checklist to Get Started](#) in e-snaps. Second, once you have created and completed your Project Applicant Profile, you will create the project application. HUD has developed detailed instructions to walk you through the process that will be posted on the [CoC Builds NOFO webpage of HUD.gov](#).

### Complete Application

The project application must be complete and include the following required attachments:

- SF-424: Application for Federal Assistance.
- HUD-424-B: Applicant and Recipient Assurances and Certifications.
- HUD-2880: Applicant/Recipient Disclosure/Update Report.
- Certification Regarding Lobbying
- SF-LLL: Disclosure of Lobbying Activities (if applicable)
- HUD-50070: Certification of a Drug Free Workspace

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- SF-424D: Assurances for Construction Programs
- HUD-2996: Certification for [Opportunity Zone](#) (OZ) Preferences Points (if at least 50% of project funds will benefit an OZ)

### Review and Selection Policy

The City of Boise serves as the OPH designated Collaborative Applicant and is responsible for submitting the final CoC Builds application, as selected by the OPH Executive Committee. OPH will review all project applications submitted in accordance with the local competition timeline and select the final project for submission to HUD.

#### Review Committee:

All applications will be reviewed by a team selected by the FUND Committee. The review team will not include a voting member that is an applicant for the local competition for CoC Builds funding. The review team will use the below scoring matrix HUD encourages CoCs to use for review in the NOFO.

Criteria	Points Possible	Description of Successful Application
Development Experience and Leveraging.	28 points	Experience with at least four other projects that have a similar scope and scale. <b>(up to 8 points)</b>
		Experience with up to three other projects that leverage substantially similar funds in proposed project (Low Income Housing Tax Credits, HOME, CDBG, Section 108, Section 202, and Section 811, etc.). <b>(up to 8 points)</b>
		Information about resources dedicated to the proposed project (LIHTC, PBV, other) including the dollar value of each commitment within context of overall cost of the project, including the estimated cost per unit. <b>(up to 8 points)</b>
		Describe how the proposed project will utilize non-federal sources of funding to support the continued operation of the project. <b>(up to 4 points)</b>
Managing Homeless Projects	12 points	Experience managing at least 4 properties including description of how they determine rent, address program participant complaints, work with other service organizations, and maintain the properties. <b>(Up to 8 points)</b>
		Experience that includes the type and frequency of supportive services that have been made available (24 CFR part 578.53 for the full list of CoC Program eligible supportive services). <b>(up to 3 points)</b>

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		Experience providing transportation for program participants. If public transportation is available at the proposed project, indicate the hours of operation and the distance from the units. <b>(1 point)</b>
Implementation Schedule	12 points	<p>Development schedule is complete and has all necessary elements. <b>(up to 4 points)</b></p> <ul style="list-style-type: none"> <li>• New Construction - date construction will begin and end, and date property will be available for move-in.</li> <li>• Acquisition - date property will be acquired.</li> <li>• Rehabilitation - dates rehabilitation of the property will begin and end.</li> </ul> <p>Also include the following elements:</p> <ul style="list-style-type: none"> <li>• site control, indicate if the property has already been identified;</li> <li>• environmental review completion;</li> <li>• execution of grant agreement;</li> <li>• start and completion dates;</li> <li>• anticipated date the jurisdiction will issue the occupancy certificate;</li> <li>• date property will be available for individuals and families experiencing homelessness to begin occupying units.</li> </ul>
		Feasibility that development milestones will be met. <b>(up to 4 points)</b>
		Likelihood that the project will be ready for occupancy within 36 months of award. <b>(up to 4 points)</b>
Property Maintenance	5 points	Plan for property maintenance annually including repairs, funding for maintenance, and replacement costs.
Unmet Housing Need	10 points	<p>Describe the population that will be served by the project and how that aligns with the level of unmet need for new units of PSH.</p> <p><i>OPH will provide an estimated gap between the number of units of PSH and the number of homeless individuals and families experiencing homelessness where at least one household member has a disability using PIT/HIC data for applicants to incorporate.</i></p>

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Management of Rental Housing	10 points	<p>Experience with rental housing projects that project applicants have managed, including plans to do the following in the proposed project:</p> <ul style="list-style-type: none"> <li>• If you have or will partner with other organization(s) within the CoC to manage a property(s), provide the organization's information, type of program participants assisted, and experience.</li> <li>• Include the number of grants for affordable housing awarded over the last three years, total amount of awards, and the type of subsidy funding or financing provided for housing.</li> <li>• Specify the number of assisted and non-assisted units in each property you list.</li> </ul> <p>Maximum points will be available for adequately describing management of at least 4 times the number of properties and units proposed in this application.</p>
Coordinated Entry	4 points	Demonstrate how the project will use the CoC's Coordinated Entry (CE) to refer and place individuals and families experiencing homelessness in the new PSH units.
Coordination with Housing Providers, Healthcare Organizations, and Social Service Providers	10 points	<p>Letters of commitment, contracts, or other formal written documents demonstrating the project meets HUD leveraging thresholds. <b>(up to 5 points)</b></p> <p>The proposed project must demonstrate:</p> <ul style="list-style-type: none"> <li>• non-CoC funded housing resources through coordination for new construction, acquisition, and rehabilitation provide at least 50 percent of the amount being requested in the application, <i>or</i></li> <li>• non-CoC funded housing resources provide subsidies for at least 25 percent of the units that are proposed in the application.</li> </ul> <p>Demonstrate through written commitment(s) from organizations to provide access to health and supportive services (e.g., supportive services, home-based and long-term services and supports, primary and medical care, behavioral health, substance use disorder treatment and recovery, and other services) as part of the proposed project.</p> <p>Outline the total value and timeframe of commitments that shows the value of assistance being provided is equivalent to at least \$7,500 per unit included in the proposed project. <b>(up to 5 points)</b></p>

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Community Integration for Persons with Disabilities	7 points	<p>Demonstrate how PSH will enable program participants to make meaningful choices about housing, health care, and long-term services.</p> <p>Address non-segregation of individuals and families experiencing, indicate whether the proposed project PSH units will be part of mixed-use development.</p>
Section 3 Requirement	2 points	<p>Outline actions that will be taken by project applicants to comply with Section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) (Section 3) and HUD's implementing rules at 24 CFR part 75 to provide employment and training opportunities for low- and very low-income persons, as well as contracting and other economic opportunities for business that provide economic opportunities to low- and very low-income persons.</p>
<b>Total</b>	<b>100 points</b>	

**Recommendation & Selection:**

The review team will use review matrix scores to inform a recommendation they will make to Our Path Home's Executive Committee for selection. Scores should ground the recommendation, and review team deliberation if more than one application is submitted for review. However, the review team may make a recommendation that strays from the scoring at their discretion based upon their review of applications and informed sense of which project will have the most local impact for the CoC.

Our Path Home's Executive Committee will consider the recommendation and then vote to select a single application that will be submitted by the designated applicant via the CoC Priority Listing.

## Local Competition Timeline

- **May 16:** HUD opened [Continuum of Care Builds \(CoC Builds\) Notice of Funding Opportunity \(NOFO\)](#). Our Path Home encourages applicants to read the NOFO in its entirety.
- **May 23:** OPH announce Local CoC Builds Competition via email and publicly post how our CoC will review and select an application on OPH's CoC Builds webpage.
- **June 13:** Project applications are due by 5:00 PM MST via email to [info@ourpathhome.org](mailto:info@ourpathhome.org).
- **June 20:** No later than June 20, the FUND Committee will review all project applications and make an application recommendation to the OPH Executive Committee.
- **June 23:** No later than June 23, the OPH Executive Committee will vote on the application for the City of Boise to submit in response to the CoC Builds NOFO.
- **June 24:** Target date by which the City of Boise will submit complete CoC Builds Application to HUD based on their recommendation to submit your application at least 48 hours before the deadline.
- **June 26:** CoC Builds NOFO closes at 8:00 PM EDT.

## Grievance and Appeals Process

The OPH Executive Committee will consider any grievances.

Grievances must be submitted in writing to the CoC Lead Agency (the City of Boise) by emailing [info@ourpathhome.org](mailto:info@ourpathhome.org) within 24 hours of the project applicants' formal notification of the funding recommendation.

The grievance must include the nature of the grievance, including an explanation of how the organization perceived it was unfairly treated. The grievance should also include a reasonable and fair proposed solution to address the grievance.

The OPH Executive Committee must provide a written response to the appeal within two business days, beginning on the first business day after the grievance was submitted.

Project applicants whose project was rejected may appeal the local CoC competition decision to HUD if the project applicant believes it was denied the opportunity to participate in the local CoC planning process in a reasonable manner by submitting a Solo Applicant project application directly to HUD prior to the application deadline. The CoC's notification of rejection of the project in the local competition must be attached to the Solo Application. Additionally, for HUD to consider its solo application, a solo applicant must also meet all the requirements outlined in the NOFO.