

FFY2025

Philadelphia CoC Local Competition Guide



**Office of Homeless Services
&
Roadmap to Homes
HUD Alignment Committee**

May 2025

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OVERVIEW

The U.S. Department of Housing and Urban Development (HUD) releases the Notice of Funding Opportunity (NOFO) for the Continuum Care (CoC) Program annually. All Continuums of Care must participate nationally in the annual HUD CoC Competition to receive these funds.

The CoC program provides funding to communities to create a community wide approach to making homelessness brief, rare and non-recurring tailored to the country's various communities. Through this program, communities support the operation of homeless assistance projects, such as Permanent Supportive Housing (PSH) for persons with disabilities, Rapid Re-Housing, Transitional Housing, and Supportive Services only projects for Coordinated Entry, as well as supporting the Homeless Management Information System (HMIS) and CoC Planning activities.

[Last year, HUD released a 2-year application cycle.](#) This means renewal projects are not required to submit a full application, instead can use the score from last year to renew this year. The Philadelphia CoC anticipates renewing for the same amount received last year, with the only new funding potentially being from voluntary or involuntary reallocations. The CoC will solicit New and Expansion projects, but cannot guarantee these projects will be included in the project ranking. Note: The information in this guide is subject to change depending on guidance or changes made by the federal government. The CoC will be in contact should any changes be made.

In the 2024 NOFO Competition, HUD awarded \$47,319,980 in project funding to the Philadelphia CoC, including \$3,715,476 in new and expansion funding to support up to 77 new housing units.

These funds were distributed in Federal Fiscal Year (FFY) 2024 (October 1 – September 30) to CoC grant recipients whose current grants expire in Calendar Year 2025 (January 1 – December 31).

HUD CoC NOFO COMPONENTS

In the past, the HUD CoC Competition has been an annual national competition, for which all Continuums of Care are required to submit a Consolidated Application, Project Ranking, and all Project Applications in order to receive funding through the CoC program. Due to the 2-year application cycle, the only FFY25 HUD CoC Component will be the Priority Listing.

DEFINITIONS

Below is a table of all the important terms and their acronyms (if any). If a box is greyed out, the information is not applicable. Listed in alphabetical order.

Name	Acronym(s) (if any)	Definition
Allocation		the amount a project is given per year, can be decided by HUD or the CoC

Continuum of Care	CoC	a regional or local group that coordinates housing and services funding for homeless families and individuals.
Department of Housing and Urban Development	HUD	
eSNAPS		the online site through which HUD solicits information
Federal Fiscal Year:	FFY	indicates the year a CoC process is conducted, anticipating going into effect at least one year after the calendar year. This year the FFY2025 CoC Process will take place, meaning all projects will either end or begin in calendar year 2026.
Grant Inventory Worksheet	GIW	issued by HUD, indicates how much a renewal project can apply for in a given funding year
Homeless Management Information System:	HMIS	the system used to collect client-level data and data on the provision of housing and services to program participants. CoCs are required to have an HMIS and collect information. CoC recipients must submit an Annual Performance Report (APR).
HUD Alignment Committee		oversees the local CoC process, makes informed recommendations to the CoC Board surrounding that process
Joint Transitional Housing and Rapid Rehousing	Joint TH/RRH, Joint TH/PH RRH J	project type/component; combines the activities of a transitional housing project and a rapid rehousing project. These projects provide a safe place for people to stay—transitional housing—with financial assistance and wrap around supportive services determined by program participants to help them move to permanent housing as quickly as possible. (HUD Definition)
Notice of Funding Opportunity	NOFO	issued by HUD, a document that indicates what is required for this year of the funding cycle
Office of Homeless Services	OHS	a Department in the City of Philadelphia Municipal Government responsible for the administrative side of the CoC, makes sure the process is completed up to HUD's standards. Also known as the Collaborative Applicant
Permanent Supportive Housing	PSH, PH, PH PSH	project type/component; permanent housing in which housing assistance (e.g., long-term leasing or rental assistance) and supportive services are provided to assist households with at least one member (adult or child) with a disability in achieving housing stability. (HUD Definition)

Philadelphia CoC (or the CoC in certain contexts)		our local group that coordinates these activities, comprised of Service Providers, OHS, Committees, participants, and anyone else who affects and is affected by housing services.
Philadelphia CoC Board, or the CoC Board		the governing body for our local CoC, comprised of members of the CoC and our community in Philadelphia
Priority Listing:		required by HUD, a list of all projects—new and renewal—within a CoC in order of priority
Rapid Rehousing:	RRH, PH RRH	project type/component; permanent housing that provides short-term (up to three months) and medium-term (4-24 months) tenant-based rental assistance and supportive services to households experiencing homelessness. (HUD Definition)
Reallocation:		the process through which the amount allocated to a project is changed for various reasons.
Supportive Services Only:	SSO, PH SSO	project type/component; allow recipients to provide supportive services—such as conducting outreach to sheltered and unsheltered homeless persons and families and providing referrals to other housing or other necessary services—to families and individuals experiencing homelessness. The recipient may only assist program participants for whom the recipient or subrecipient of the funds is not providing housing assistance. (HUD Definition)
Transitional Housing:	TH	project type/component; temporary housing with supportive services to individuals and families experiencing homelessness with the goal of interim stability and support to successfully move to and maintain permanent housing. These projects can cover housing costs and accompanying supportive services for Program Participants for up to 24 months (HUD Definition). No longer supported in the Philadelphia CoC.
Youth Homelessness Demonstration Program:	YHDP	funding type; an initiative designed to reduce the number of youth experiencing homelessness

LOCAL PROCESS

As a requirement for the HUD CoC Competition, the Philadelphia CoC must implement a thorough review process of all new and renewed project applications submitted in the HUD CoC Process. This review will be based on the HUD Priorities in conjunction with our Guiding Principles. The results of this process are used to rank and prioritize projects for funding to ensure which projects the community will recommend

to HUD. All projects should serve the community’s most vulnerable and underserved populations. HUD makes final funding decisions for all CoCs. In FFY25, the Philadelphia CoC Local Process will include the following parts:

- Intent to Apply for Renewal Projects
- New Local Project Applications
- Priority Listing Submitted to HUD with all projects, renewal and new

In order to establish a “collaborative process for the development of applications and [to] approve the submission of applications in response to a NOFO published by HUD” 24 CFR 578.9(a)(1), the Office of Homeless Services solicited volunteers from the CoC Board and homeless assistance system to create the HUD Alignment Committee. This committee is the governing body responsible for upholding the process and integrity of the Local Competition. Final recommendations for the HUD national competition are submitted by the HUD Alignment Committee, which oversees the Local CoC Process, to the Philadelphia CoC Board for approval. OHS as the Collaborative Applicant is then responsible for the final submission to HUD.

GUIDING PRINCIPLES

The local CoC Board approved the FFY25 Local Competition guiding principles on 4/10/2025.

The guiding principles are:

Principles	Explanation
Center Best Practices	The Philadelphia CoC will continue to advance its policies, programs and operations informed by data and best practices. The CoC will: <ul style="list-style-type: none"> - Ensure tailored access to individuals’ specific needs and circumstances for all eligible participants and households. - Provide services based on the values of those with lived experience: being trauma-informed, person-centered, assessment-based, data-driven, flexible, efficient and transparent.
Advance Accessibility	Adhere to and advance local, state and federal fair housing laws and rules, the Americans with Disabilities Act (ADA), and the OHS Equal Access Policy. Increase accessible housing.
Build Capacity	Build and exercise shared power and decision making in collaboration with the CoC, providers, and participants in a fair and transparent way—with the role of providers being clearly defined to support and assist participants in achieving their goals. Center housing stability in programming driven by data and best practices. Maximize funding from HUD through data-driven allocation and creating new projects.

Rapidly House Individuals	Correctly, quickly and successfully connect individuals and families experiencing homelessness to long-term housing without preconditions and/or barriers to entry. Support participants searching for housing and maintaining that housing to minimize further trauma. Refer them to services as needed to achieve self-sufficiency.
Promote Positive Living	Promote, Create and Enhance positive living opportunities for participants to thrive while addressing everyday challenges and barriers to housing and supportive services. Develop and Implement Programs with solutions in serving the most vulnerable Philadelphians experiencing homelessness. Promote and support skill development, homeownership, job advancement, life skills, parenting, mental health therapy, etc. as participants express their life goals.

RENEWAL PROJECTS

Intent to Apply

ALL existing projects that were renewed by HUD in FFY24 or that expire in calendar year 2026 must submit an Intent to Apply to notify OHS of their intent for FFY25's competition. **All Intent to Apply forms are due by 5:00 pm EST on June 11th through Submittable.**

All applications from projects renewed in FFY24 will be prioritized in the FFY25 Priority Listing submitted to HUD once approved by the CoC Board. Renewal projects are not required to submit a full application and will keep the score and placement in the ranking they received last year. In lieu of a full application, renewal projects must submit an Intent to Apply in order to be considered for renewal in FFY25.

For OHS Direct applicants, the subrecipient (the organization contracting with the City of Philadelphia) must submit the Intent to Apply with the understanding that the City reserves the right to voluntarily reallocate. Any renewal project that fails to complete the FFY25 Local CoC Intent to Apply by the deadline automatically forfeits the opportunity to be included in this year's Project Ranking and would be considered an Involuntary Reallocation.

Reallocations and Appeals

Renewal applications may be subject to voluntary or involuntary reallocation. During the Intent to Apply process, Service Providers may indicate they wish to voluntarily reallocate project funds, in whole or in part. After the Intent to Apply process, OHS shall conduct the Reallocation process as outlined in the Reallocation Policy and Procedures in the Appendices. Projects determined to be underperforming (that is, underspending for the past 3 grant years) may be subject to involuntary reallocation.

The CoC will notify Providers of reductions to their project funding request and conduct appeals. Providers may submit an appeal of their reduction or with evidence of unfairness in the CoC Process. The HUD Alignment Committee will then review these appeals and make their final decision. Providers may

also schedule a meeting over Zoom with the HUD Alignment Committee to argue their case to reduce or rescind their reallocation.

New Projects

To close the gaps in the system and address community demand, providers and new projects are encouraged to apply for funding. **Please be on the lookout for an RFP in the near future.** Any programs that lost funding in a prior competition (including FFY24) are eligible to apply for New Projects in FFY25.

Any new organization that fails to complete a FFY25 Local CoC New Application by the deadline will forfeit the opportunity to be included in the FFY25 Priority Listing.

The Request for Proposal (RFP) for new CoC projects will be posted on the City of Philadelphia's website. The Office of Homeless Services will be responsible for collecting applications and the HUD Alignment Committee will be responsible for reviewing the applications received.

New Project Application Evaluation Tool

The following criteria is what new projects will be scored on with the sections, section points, questions, source in eSNAPS, the point breakdown, and what the metric shall be.

Categories	Points	Questions	Source	Breakdown	Scoring Metric
Applicant Info	Not Scored	Name	1B-8a		
		EIN	1B-8b		
		UEI	1B-8c		
		Address	1B-8d		
		Contact Info	1B-8f		
Project Info	Not Scored	Project Name	1D-15		
		Start Date	1D-17a		
		End Date	1D-17b		
		Declaration	1F		
		Amount Requested	1G-4		
Certification	Not Scored	Certification	1G		
		HUD 2880	1G		
		Drug Free Workplace	1H		
		Lobbying	1H - 1J		
		Non-Construction	1K		
		Environmental Review	HUD		
		Appendix B-2/C/D/E	City		
Org Experience	40	Effectively utilizing federal funds and performing activities proposed in the application	2B-1	10	Demonstration of experience in serving individuals who are or at risk of homelessness; people in poverty, providing services and similar activities.

		Leveraging Federal funds	2B-2	10	Plan to leverage funds and demonstration of financial capacity
		Financial Management Structure	2B-3	15	Describe financial management of organization. This includes: separation of duties, experience of staff, accounting system used, etc.
		HUD Monitoring	2B-4	5	
Project Detail	20	Project Type	3A-5a		
		DV project	3A-6		
		Scope	3B-1	20	Demonstration of need, Partnerships
					Plan to effectively house, Addressing severe barriers
					Show system performance measures: how do you plan to use these funds to achieve your organizations goals
		Specific Populations	3B-3		
		Housing First - Enrollment	3B-5b		
		Housing First - Termination	3B-5c		
		Expansion	3C		
Supportive Services	40	Assistance to participants	4A-1	20	Plan for program participants to be assisted to obtain and remain in permanent housing
		Plan to integrate social services	4A-2	20	Plan to coordinate and integrate with outside partners
					Services provided
		Provider / Frequency	4A-3		
Housing Type and Location	Not Scored	Housing Type	4B-1		
		Units and Beds	4B-2		
		Project Address	4B-3		
		Households	5A		
		Subpopulation	5B		
Funding Request	Not Scored	Funding Type	6A-2		
		BLIs	6A-5		
		VAWA	6A-5		
		Match	6I		
		Summary Budget	6j		
Attachments		Match Letters	7A		

	Not Scored	IRS Exemption Letter	7A		
100			100		

Funding for FFY2025 New Projects

Due to the unique situation of the FFY24 2-year NOFO that includes FFY25, OHS cannot guarantee funding for New Projects will be available. Projects will be notified in the event no funding is available prior to final submission to HUD. The new projects or expansion projects will be assessed, ranked, and reviewed based upon the criteria in the New Project Application Evaluation Tool. These criteria reflect the local CoC Values approved by the CoC Board. The goal of adding new projects or expanding existing projects is to address community needs and close any holes or gaps in Philadelphia's homeless assistance system.

Eligibility Requirements

Threshold Requirements are eligibility and quality requirements that must be met for an application to be reviewed, rated, and ranked. Because of the 2-year NOFO, Renewal applications are automatically considered to have met the eligibility requirements for FFY25. The following eligibility requirements shall be applied to new projects. These requirements will be assessed and reviewed by the Philadelphia CoC (PA-500) designated Collaborative Applicant, The City of Philadelphia's Office of Homeless Services (OHS).

THRESHOLD ELIGIBILITY In accordance with HUD regulations, the sub-recipient must be a private nonprofit organization, defined in 24 CFR §578.3 as meeting the following criteria:

- No part of the net earnings of which inure to the benefit of any member, founder, contributor, or individual;
- Has a voluntary board;
- Has a functioning accounting system that is operated in accordance with generally accepted accounting principles, or has designated a fiscal agent that will maintain a functioning accounting system for the organization in accordance with generally accepted accounting principles; and
- Practices nondiscrimination in the provision of assistance;

Private non-profit organizations that meet these criteria, with documented tax-exempt status under Section 501(c)(3) of the 1986 IRS Code as amended, may apply for this opportunity. A private non-profit organization does not include organizations created by government, such as public housing agencies.

PROJECT QUALITY THRESHOLD. OHS will review all new project applications to determine if they meet the following project quality threshold requirements. New projects must show the following documents to be considered for threshold:

- Most recent financial audit (2024 preferable)
- Commitment of at least 25% of match funding—this funding does not necessarily need to be secured but there must be a commitment in the form of a letter signed by an authorized individual.

Contracting with the City of Philadelphia

Consistent with our values, the City requires that all contractors and subcontractors comply with all applicable laws, regulations, and policies. Please closely review the

City's contract attachments including the standard terms and conditions found in the General Provisions under Appendix A of the FY25 Local Competition. Any contract resulting from the FFY25 Local Competition will be incorporated and be governed by these attachments:

- Appendix B – Subcontracting and Antidiscrimination Policy
- Appendix C - City of Philadelphia Tax and Regulatory Status and Clearance Statement
- Appendix D – Local Business Entity or Local Impact Certification
- Appendix E – LGBTQ Applicant Opportunity Data
- Nonprofit Tax-Exempt Status Documentation

In addition to these appendices, the following documents will be requested should your application be selected for inclusion in the Priority Listing:

- HUD Form 50070: Certification for a Drug-Free Workplace
- HUD Form SF-LLL: DISCLOSURE OF LOBBYING ACTIVITIES
- HUD Form 2880: Applicant/Recipient Disclosure/Update Report
- Annual Fiscal Review from FFY24 or prior

By submitting an application, first time applicants agree to become a contractor with the City of Philadelphia. Applicants who have received CoC funding before may potentially contract as HUD Direct by establishing a Memorandum of Understanding (MOU). Please reach out to OHS staff should this apply to your organization.

EXPANSION PROJECTS

In addition to new projects, expansion projects may also be submitted under the same form. An Expansion Project is one that combines an existing eligible renewal project with a new project requesting funding to expand the existing project.

Eligible and ineligible projects and activities

The expansion project (i.e., the existing renewal project and the new expanded portion of the project) must meet the conditions below:

- The grant period for the existing renewal project must expire in Calendar Year (CY) 2026 (between January 1, 2026 and December 31, 2026).
- The renewal project and the new expanded portion of the project must both have the same component type.
 - Eligible project components: PH-PSH, PH-RRH or Joint TH/PH-RRH
 - Ineligible projects: Transitional Housing, Safe Haven
- The new expanded portion of the project may be funded through reallocation. The new project funding must not be replacing other funding sources.

- The expansion grant is limited to either a 1-year grant term or 18-month grant term, regardless of the project type.
- For each expansion project, the applicant is limited to one (1) New Project Application to expand a specific renewal.
- Ineligible costs: capital costs (i.e., new construction, rehabilitation, or acquisition)

Review the [FFY24 CoC Program NOFO](#) for more information about eligibility and criteria.

TRANSITION PROJECTS

Should an organization wish to transition from one eligible project type to another, they may submit a Transition Grant application under the New Project form. The original renewal project must indicate a voluntary full reallocation on their Intent to Apply and submit a New Project application for the transitioned project as the new component type. From then on, the project may renew in subsequent years as the new project type with eligible activities. Organizations will have one year to complete the full transition. **If your organization wishes to utilize a Transition Grant, please reach out to OHS to discuss how the process will work for you.**

CONSOLIDATED PROJECTS

For consolidated projects, please complete the Intent to Apply and follow all instructions. Your organization will indicate what projects are being consolidated and which project will be the Parent Project (the project all the others will fold into).

Eligibility for Consolidating Projects

To be eligible for consolidation, renewal projects must meet all four of the conditions below:

- The grant period must expire in Calendar Year (CY) 2026, as confirmed on the FFY25 Final GIW on the *GIW Reports page*.
- The projects must be consolidated under the same recipient.
- The projects must have both the same component and project type (i.e., PH-PSH, PH-RRH, Joint TH/PH-RRH, TH, SSO, SSO-CE or HMIS)

Ineligible Consolidations

There are some restrictions regarding consolidations:

- A TH project cannot consolidate with a PH:RRH project to create a Joint TH and PH:RRH project.
- YHDP Replacement projects cannot consolidate with another project.
- Transition projects cannot consolidate with another project.
- While YHDP Renewal projects can consolidate with each other, a YHDP Renewal project cannot consolidate with a non-YHDP renewal.

YOUTH HOMELESSNESS DEMONSTRATION PROGRAM (YHDP)

According to HUD “The goal of YHDP is to support selected communities...across the United States, in the development and implementation of a coordinated community approach to preventing and ending youth homelessness.” FFY23 concluded Round 6 of YHDP Funding. In FFY25, all renewal YHDP projects must complete an Intent to Apply to be included in the Priority Listing submitted to HUD.

New or expansion projects looking to receive YHDP funds may do so through the new application process as YHDP Replacement projects. This process will be under the condition that the Philadelphia CoC will be able to reallocate enough YHDP funds for Replacement projects. Note that only YHDP funds can go towards YHDP projects and vice versa.

APPLICATION EVALUATION AND SCORING

All submissions for the FFY2025 competition will be collected through the Submittable grant portal. From there, the HUD Alignment Committee along with OHS support team will be responsible for reviewing and scoring New and Expansion applications, then developing a Priority Listing with all projects. The HUD Alignment Committee will then present their proposed priority listing to the CoC Board, who will vote to then make the final recommendation to HUD.

What is the HUD Alignment Committee?

The committee is part of the Philadelphia CoC Board structure which designs and adapts local strategy to ensure that policies, procedures, and general direction of Philadelphia's homeless assistance system align with federal requirements and HUD priorities.

PROJECT REVIEWERS

New and Expansion project proposals are first reviewed by City of Philadelphia Office of Homeless Services staff to establish whether they pass threshold requirements. Once projects meet threshold, the applications with all materials will be submitted to the HUD Alignment committee. The committee members then review each project. Each project will be reviewed by 5 individuals, at least 3 being committee members of the HUD Alignment Committee. Once review of all applications is complete, any new projects will be included in the project ranking of the local competition with the renewal projects.

CONFLICT OF INTEREST

Every effort is made to avoid conflict, or the appearance thereof, when assigning proposals to reviewers. Before reviewers score proposals, reviewers sign a conflict of interest for, which identifies whether a conflict of interest exists with any application that has been assigned to them. A conflict of interest includes, but is not limited to, a situation in which the reviewer or a member of the reviewer's immediate family have a financial or other interest with an applicant responding to the RFP, such as, but not limited to cases in which they:

- Are employed or have a formal association with an agency that applied;
- Have recently served as a consultant for an applicant agency;

- Are named as a potential consultant or subcontractor in the application; or
- Have extensive knowledge about the application or proposed project and is unable to objectively review the application.

If the reviewer or a member of the reviewer's immediate family has such a relationship with any applicant who submitted a proposal in response to the RFP, the reviewer must recuse themselves from reviewing and evaluating any proposals submitted by said applicant.

All reviewers agreed to base their review and evaluation only on factors and information that the Office of Homeless Services and the City have determined are relevant to the proposal review process, as described in the RFP.

CONFIDENTIALITY

Adherence to confidentiality is critical to the integrity of the review process and the protection of reviewers evaluating proposals. All reviewers agreed to abide by the following confidentiality requirements before, during, and after the review process:

- All information related to the proposals (including the proposals themselves and any related materials supporting the selection process) should be kept in strict confidence and may not be disclosed to any person or entity without the express authorization of the appropriate department personnel.
- Reviewers may not release, transmit or otherwise disclose any information contained in any proposal, any information about the RFP evaluation process beyond the description within the RFP, and/or any other information about the review process or selection of an applicant.
- Impressions or judgments concerning the proposals are not to be discussed or shared with anyone prior to, during, or after the review panel's deliberations (exceptions: discussions with other review panel members during panel deliberations and staff discussions during HUD Alignment Committee and CoC Board meetings).
- Reviewers may not use information obtained in the review process for any financial benefit to themselves, their immediate families or any business with which they or their immediate families are associated. The proposals, as well as the ideas, concepts, methods, or techniques included in the proposals are to be considered proprietary, and all rights thereby implied are to be respected.

SCORING PROJECT APPLICATIONS

The HUD Alignment Committee approved a local review scoring instrument to review all new project applications. Each new application is independently reviewed using the local review instrument by the HUD Alignment Committee. Renewal Projects will be automatically renewed for the score received in the FFY24 Competition per HUD's policy for the FFY24 NOFO 2-year competition.

TIMELINE

December

- Solicit informal feedback on prior FFY24 competition (Housing Division, HUD Alignment, etc.)
- Create timeline for FFY25 Local Competition (Mandatory Debriefing, Release date, etc.)
- Reserve any rooms/locations needed for the application process
- Gather performance data (Data Standards, HIC/PIT and HUD SysPM)
- Compile list of elements collected by other CoCs in their local competitions

January

- Onboarding to HUD Alignment Committee new members and refresher of committee tasks
- Review current policies with HUD Alignment Committee
- Review last year's application scores for strengths and weaknesses
- Review feedback surveys on how to improve Submittable

March

- Hold FFY25 Debrief (March 14th)
- Hold Spring 2025 Community Meeting (March 27th)
- Prepare New Project RFP from eSNAPS criteria

April

- Hold meeting with Service Provider Commission and HUD Alignment (April 3rd)
- Hold initial eSNAPS and Submittable training (April 4th)
- Hold Office Hours for eSNAPS and Submittable (April 8th)
- Revise local competition Expectations & Values for board approval (April 10th)
- Revise and Finalize FFY25 Local Competition Guide
- Get Board Approval of new guiding principles and Local Competition Guide via e-vote
- Review and Finalize New Project RFP

May

- Release FFY25 Competition Intent to Apply (May 21st)
- Projects notified of reallocations and reductions (May 30th)

June

- Hold Brief for Intent to Apply Renewal Projects (June 2nd)
- Intent to Apply: Renewal Projects Due (June 11th)
- Review ITAs
- Appeals period (June 9th-June 16th)
- Renewal Appeals Meetings:
 - Wednesday, June 11th, 10-11am
 - Monday, June 16th, 2-2:30 pm
- New projects notified of awards

July

- Priority Listing Approved by Board
- Final Priority Listing posted to website

August

- Submit Priority Listing to HUD (August 25th)
- Update feedback survey for providers on the application and its process
- Release Feedback Surveys (TBD)
- Summarize provider feedback surveys
- Present feedback from surveys to HUD Alignment Committee (TBD)

Timeline subject to change due to HUD NOFO Release.

FFY25 Local CoC SUBMITTABLE APPLICATION EVALUATION TOOL

The Submittable portal auto generates the scores based on the specific responses, which is populated in the application submission. Upon submission of the application, the application will move to the review stage to the assigned reviewers, in order to complete the scoring for the narrative response sections. The values are identified for each question through the FFY25 Local Competition Score Values.

Things to consider when submitting application:

- 1) Please read all directions carefully.
- 2) Only 1 form can be completed and submitted at a time.
- 3) Once a form has been submitted, you will receive an email from Submittable. Save this email for your records.
- 4) Reminder: There is a "Save Draft" button at the bottom of each application. Please remember to save your work as you go through the application.
- 5) Instructions/guidelines for narrative responses and tables are located below each field to be completed.
- 6) Applications will be reviewed blindly. To ensure a fair review process, do not include **ANY** identifying information about your organization, staff, or programs.
- 7) If any required questions that do not apply to your organization, please write "N/A."

REALLOCATION POLICY AND PROCEDURE

Philadelphia Continuum of Care (PA-500) 2025 Local Competition

Reallocation Policy

Under the Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH), the Department of Housing and Urban Development's (HUD) reallocation process allows Continuums of Care (CoC) to fund new projects by transferring all or part of funds from any existing CoC grant to create a new project.

The Philadelphia CoC, operating as the City of Philadelphia Office of Homeless Services (OHS), intends to use this process as needed to improve system performance and actively encourage provider organizations (both new and existing) to apply for new projects funded through both reallocation and bonus dollars. The reallocation process will be communicated to our CoC Partners via email and posted on the OHS website individually as well as a part of our Local Competition Guide. This policy will be revisited annually and approved by the HUD Alignment Committee and our CoC Board.

Process

Reallocation may be voluntarily initiated by renewal applicants or initiated by OHS and the HUD Alignment Committee. Decisions related to involuntary reallocation will be conducted in accordance with this policy in a transparent, equitable, and data-driven capacity with an emphasis on local needs. Organizations will be given the ability to appeal these decisions prior to the final ranking of projects submitted to HUD.

Reallocation amounts may comprise whole or in-part of projects. These amounts are to be sufficient to fund entire projects, either as a part of or in addition to CoC Bonus funding allocated by HUD. In the event no CoC Bonus funds are allocated, small amounts of reallocation will not be considered.

Reallocated funds will stay within their funding categories as outlined by HUD (i.e. funds reallocated from a DV Bonus project shall be used for any new DV Bonus projects, and not for 100% Dedicated or any other funding category. Vice versa for YDHP and others.)

Voluntary Reallocation

Provider organizations may choose to voluntarily reallocate as a part of the Intent to Apply (ITA) stage of the Local Competition Process. This stage is meant for renewal projects to indicate what they intend to do for the upcoming year as well as gather organizational information prior to the project application stage. To voluntarily reallocate, a representative of the provider will complete the ITA indicating they wish to reallocate whole or partial project funds to the CoC. This choice may be made for all projects a provider organization has or individual.

OHS will follow-up with the provider organization about the process to wind down the project as funded by the CoC.

These reallocated funds may be used in any new projects. No preference will be given to organizations who voluntarily reallocated and plan to apply for new projects.

Involuntary Reallocation

The CoC reserves the right to reallocate renewal funding to new projects to maximize services, ensure competitiveness, and/or to address underperforming projects. The CoC may choose reallocation from any CoC project to meet its responsibility to ensure the CoC Consolidated Application best aligns with HUD priorities and contributes to a competitive consolidated application. All reallocation decisions must be approved by the CoC through a vote. Prior to this vote, appeals may be submitted and argued to the HUD Alignment Committee to potentially reduce reallocation.

Reallocations are determined at the end of the review period in which OHS judges a project's performance based on the below measure(s) and decides reallocation is in the best interest of the CoC. Once this decision is made, the organization will communicate with the provider organization whose project has proposed reallocations. The provider organization may then submit an appeal as outlined in the Appeal Policy and Procedures within the allotted appeal period to potentially reduce or annul the reallocation.

It is the responsibility of the CoC to strategically determine how to best use the resources available to enact the Guiding Principles and Priorities as outlined by the CoC Board. The CoC may reallocate funds from projects that are seen as underperforming. Underperforming projects in the FY2025 Competition are defined as those that meet the following criteria:

- Underspending: Project falls below an average of 80% of funds drawn down (meaning drawn down for HUD Direct or invoiced for OHS Direct) over the past 3 grant years (i.e. grant years ending in 2022, 2023, and 2024)

Projects that demonstrate a consistent trend of spending below 80% over the most recent 3 grant years shall be considered for reallocation. The data to determine underspending shall be pulled from Sage, [HUD's HMIS Reporting Repository](#). Data from Sage will be pulled in early May 2025.

To determine the reallocation amount, the following calculation will be performed:

- The draw-down percentages of the past 3 grant years will be averaged, and the resulting percentage will be the amount of the total grant funds to be applied for, with the remainder being reallocated
 - E.g. If the percentages drawn down were 2022: 78% 2023: 78% and 2024: 75%, the resulting percentage is 77%. For a \$100,000 grant, this means 23% (\$23,000) will be reallocated, and the renewal application will be submitted for \$77,000
- If the most recent year's draw-down percentage is greater than the 3-year average draw down percentage, it will be used in place of the 3-year average, to ensure the project is not penalized for improvements made in spending
 - E.g. If the percentages drawn down were 2022: 75% 2023: 75% 2024: 79%, the resulting average is 76.33%. However, because the most recent year shows 79% of the grant spent, 21% of the grant will be reallocated, rather than 23.66%
- If the project experienced a reduction or reallocation in the FY24 Competition, it will be exempt from any further reallocation in this year's Competition.

At that appeal hearing, no new documents may be submitted for consideration. Appeals will only be based on the information submitted with the filed appeal.

After review of an appeal hearing, agencies will receive the decision made. The letter detailing the decision by the HUD Alignment Committee must be signed by the HUD Alignment Committee and a representative from the Office of Homeless Services.

NOTICE OF APPEAL

Philadelphia Continuum of Care (PA-500) 2025 Local Competition

Appeals Policy and Procedures

In the interest of transparency and fairness, any projects may submit an appeal should they find the scoring process unfair or were found underperforming and been reduced in accordance with the Reallocation Policy are eligible to appeal this decision.

Appeals cannot be used to adjust a project's performance. If a provider would like to discuss their project's performance in the 2025 Local Competition, they may email OHSGrants@phila.gov.

Appeal Form

The Notice of Appeal form is included as a part of the Local Competition Guide and posted on the [OHS website](#). Questions about the form or the required attachments may be sent to OHSGrants@phila.gov.

Procedure for Filing an Appeal

Forms must be submitted to OHSGrants@phila.gov by **June 16, 2025**.

The appeal must include:

1. A written statement, specifying in detail each of the grounds asserted for the appeal.
2. The appeal must be signed by an individual authorized to represent the sponsor agency (i.e., Executive Director).

Appeals will not be considered for incomplete applications, applications that did not provide all necessary documents for appropriate consideration or submitted after the due date of June 10, 2025.

Appeal Review Procedure

All appeals will be read, reviewed and evaluated by the HUD Alignment Committee.

Agencies submitting an appeal may also be given an opportunity to make a brief presentation via Zoom to the HUD Alignment Committee. If so, appealing agencies may send up to two staff members to the presentation. These presentations will be limited to 10 minutes with 5 minutes for questions from members of the HUD Alignment Committee.

The HUD Alignment Committee will be reviewing appeals on the following days, providers may schedule a 15-minute block via the following form to give their presentation and argue their case. The following dates and times will be available for appeals:

- Wednesday, June 11th, 10-11am
- Monday, June 16th, 2-2:30 pm

At that appeal hearing, no new documents may be submitted for consideration. Appeals will only be based on the information submitted with the filed appeal.

After review of an appeal hearing, agencies will receive the decision made. The letter detailing the decision by the HUD Alignment Committee must be signed by the HUD Alignment Committee and a representative from the Office of Homeless Services.

APPEAL FORM

Philadelphia Continuum of Care (PA-500) 2025 Local Competition

Notice of Appeal

Instructions

- One appeal form must be submitted for each project evaluation report appealed.
- Fill out this form with the required attachments and make a copy of the completed form for your records.
- Scan and email the completed form to OHSGrants@phila.gov.
- If you have any questions regarding completing the notice of appeal, email OHSGrants@phila.gov.

1. Appellant Information (Party filing appeal):

a. Name of Authorized Official:

b. Name of Agency:

c. Grant Award Number:

d. Contact Information:

i. Address of Administrative Office:

ii. Mailing Address (if different):

iii. Contact Person (if different than signatory):

iv. Phone:

v. Contact email:

2. Please select reason for appeal.

- ☐ Project is not funded or received less funding than amount in application.
- ☐ Unfair process / score does not reflect information provided in application.

In addition to this form, please submit a written statement (single-spaced, 12-point font, 1 page maximum) indicating the reason(s) for the appeal. Please include any evidence for the HUD Alignment Committee to evaluate and make their final decision. This evidence may include up to three (3) attachments outside of your written statement. The written statement must be signed by an individual authorized to represent the agency.

If you would like to schedule a meeting to discuss your organization's appeal with the HUD Alignment Committee over Zoom, please schedule one (1) 15 minute time slot during the following meetings. Please arrive 5 minutes early.

The following dates and times will be available for appeals:

- Wednesday, June 11th, 10-11am
- Monday, June 16th, 2-2:30 pm

Please select which one you are able to attend and you will receive an invite to the Zoom meeting on submission of this form.

Authorized Signature

Signature or Authorized Official

Date

