

# COLUMBIA GREENE HOUSING COALITION (CGHC)

## FY2025 RANK & REVIEW RENEWAL APPLICATION PART 3: ADDITIONAL HUD PRIORITIES

Note: this section of the application is based on specific priorities that were outlined in the FY2025 Continuum of Care Competition and will be used to evaluate projects. This is a requirement of the FY25 Rank and Review Applicant submitted on behalf of all renewal applicants.

Organization Name: \_\_\_\_\_

Project Name: \_\_\_\_\_

Application Contact Person: \_\_\_\_\_

Project Type:  PSH       RRH       TH       TH/RRH       SSO

1. Does your project provide on-site services for either of the following Max 2 pts

- Mental Health Services
- Substance Abuse Services
- Provide 24-hour on-site services

2. Will your project require participation agreements with case management services as part of your programming? Please provide a sample copy of how this participation agreement will be documented Max 5 pts

- Yes- 5 pts
- No- 0pts

3. Does your agency cooperate with local law enforcement and first responders to advance public safety? Max 2 pts

- Yes- 2pts
- No- 0pts

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4. Do you partner with any of the following to help participants increase employment and employment based income? You will need to attach a copy of the agreement.

Max 3 pts

Workforce Development

Childcare

Local Employers

5. Has at least 20% of your participants exit to a positive housing destination that does not have a subsidy attached? Thi3s will be confirmed with your HMIS administrator.

Max 2.5 pts

Yes-2.5 pts

No-0 pts

6. Was your return to homelessness rate after 24 months less than 8%?

Max 2.5 pts

Yes-2.5 pts

No-0 pts

7. Did at least 20% of your program participants show an increase in employment-based income at annual assessment? This will be confirmed with your HMIS administrator.

Max 10 pts

Yes- 10 pts

No- 0 pts

8. Did at least 25% of your program leavers have an increase in employment-based income?

This will be confirmed with your HMIS administrator.

Max 10 pts

Yes- 10 pts

No- 0 pts

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**Instructions:**

All agencies applying for CoC funding must review and sign off on the below Project Eligibility Threshold, Project Quality Threshold (broken down by New Projects and Renewal Projects), and Post Award Requirements as part of the Rank & Review process. Please return to CARES with your Rank & Review applications.

**Project Eligibility Threshold (pg. 53-54 of the FY25 CoC NOFO)**

Applicants who fail to meet the following threshold eligibility requirements are ineligible to apply for funds during this competition. Please review the following requirements and sign off at the end of the document to verify your project eligibility.

- (1) Project applicants and potential subrecipients must meet the eligibility requirements of the CoC Program as described in the Act and the Rule and provide evidence of eligibility required in the application (e.g., nonprofit documentation).
- (2) Project applicants and subrecipients must demonstrate the financial and management capacity and experience to carry out the project as detailed in the project application and the capacity to administer federal funds. Demonstrating capacity may include a description of the applicant and subrecipient experience with similar projects and with successful administration of SHP, S+C, or CoC Program funds or other federal, state, local, or private resources.
- (3) Project applicants must submit the required certifications specified in this NOFO.
- (4) The population to be served must meet program eligibility requirements as described in the Act, the Rule, and section III.G.10 of this NOFO.
- (5) Project applicants, except Collaborative Applicants that only receive awards for CoC Planning costs and, if applicable, UFA Costs, must agree to participate in a local HMIS system. However, in accordance with Section 407 of the Act, any victim service provider that is a recipient or subrecipient must not disclose, for purposes of HMIS, any personally identifying information about any client. Victim service providers must use a comparable database that meets the needs of the local HMIS.
- (6) Project applicants must certify affirmatively to the following:
  - The project applicant will not engage in racial preferences or other forms of illegal discrimination.
  - The project applicant will not operate drug injection sites or “safe consumption sites,” knowingly distribute drug paraphernalia on or off of property under their control, permit the use or distribution of illicit drugs on property under their control, or conduct any of these activities under the pretext of “harm reduction.”

*I Certify that my project is eligible to apply for HUD CoC funding under the above criteria:*

Signature of applicant: \_\_\_\_\_

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### **NEW Projects: Project Quality Threshold (pg. 54-55 of the NOFO):**

***Please note: New Project Applications need to meet additional criteria to be eligible. Please see pg. 99-08 of the [FY69 CoC NOFO](#).***

HUD will review all new project applications to determine if they meet the following project quality threshold requirements HUD will not award funds to a new project unless the project was created through reallocation, or the CoC has demonstrated to HUD's satisfaction that projects are evaluated and ranked based on the degree to which they improve the CoC's system performance.

(1) HUD will consider any project requesting renewal funding, including renewing YHDP and renewing Special NOFO projects, as having met project quality threshold requirements through its previously approved grant application unless HUD receives information to the contrary or if the renewal project has compliance issues which results in the project not operating in accordance with the Rule.

(2) HUD will consider YHDP Replacement project applications including applications for new YHDP projects created through YHDP reallocation as having met project quality threshold requirements if the project application activities and costs are eligible under this NOFO. If a YHDP Replacement (including YHDP Reallocation) project application is not for activities and costs that are eligible under this NOFO, HUD will not reject the project under this project quality threshold, but HUD will require the project applicant to correct or revise information submitted after the final CoC Program award announcement but before executing the grant agreement.

(3) HUD will review the UFA Costs submitted by the UFA designated Collaborative Applicant to ensure appropriate match and eligibility of costs requested.

(4) HUD will assess all new project applications for the following minimum project eligibility, capacity, timeliness, and performance standards.

(a) project applicants must have satisfactory capacity, drawdowns, and performance for existing grant(s) funded under the CoC Program, as evidenced by timely reimbursement of subrecipients, regular drawdowns, and timely resolution of any monitoring findings; however, this does not apply to project applicants who have never received a CoC Program funded project;

(b) for expansion project applications, project applicants must describe the part of the project that is being expanded and demonstrate the project is not replacing other funding sources; and

(c) project applicants must demonstrate their ability to meet all timeliness standards per 24 CFR 578.85. HUD reserves the right to deny a funding request for a new project, if the request is made by an existing recipient that HUD finds to have significant issues related to capacity, performance, unresolved audit, or monitoring findings related to one or more existing grants; or does not routinely draw down funds from eLOCCS at least once per quarter. HUD also reserves the right to withdraw funds if no APR is submitted on the prior grant.

(5) HUD reserves the right to verify past performance and evaluate the eligibility of a project application submitted during the CoC Program Competition for the following reasons:

(a) evidence that the project has previously or currently conducts activities that subsidize or facilitate racial preferences or other forms of illegal discrimination or conduct activities that rely on or otherwise use a definition of sex other than as binary in humans.

(b) evidence that the project operates drug injection sites or "safe consumption sites," knowingly distributes drug paraphernalia on or off of property under their control, permits the use or

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distribution of illicit drugs on property under their control, or conducts any of these activities under the pretext of “harm reduction.”

(6) Additionally, for HUD to consider new projects as meeting project quality threshold, each new project must meet the following criteria as applicable. If awarded, a recipient must meet all the criteria listed in the criteria column for its component.

*I Certify that my NEW project will pass quality threshold review to apply for HUD CoC funding under the above criteria:*

Signature of applicant: \_\_\_\_\_

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### **RENEWAL Projects: Project Renewal Threshold (pg. 64-65):**

CoCs must consider the need to continue funding for projects expiring in CY 2026 (January 1, 2026 to December 31, 2026) when applying for FY 2025 CoC and YHDP funding. Renewal projects must meet the minimum project eligibility, capacity, timeliness, and performance standards identified in this NOFO or they will be rejected from consideration for funding:

(1) When considering renewal projects for award; HUD will review information in eLOCCS, APRs, and information provided from the local HUD CPD field office; including monitoring reports and audit reports as applicable, and performance standards on prior grants, and will assess projects using the following criteria on a pass/fail basis:

- (a) whether the project applicant's performance met the plans and goals established in the initial application, or grant as amended;
- (b) whether the project applicant demonstrated all timeliness standards for grants being renewed have been met, including those standards for the expenditure of grant funds;
- (c) the project applicant's performance in assisting program participants to achieve and maintain self-sufficiency and independent living and records of success, except dedicated HMIS projects are not required to meet this standard; and
- (d) evidence of unwillingness of project applicants to accept technical assistance, a history of inadequate financial accounting practices, indications of project mismanagement, a drastic reduction in the population served, program changes have been made without prior HUD approval, or the loss of project site control.

(2) HUD reserves the right to reduce or reject a project application submitted during the CoC Program Competition for the following reasons:

- (a) outstanding obligation to HUD that is in arrears or for which a payment schedule has not been agreed upon;
- (b) audit finding(s) for which a response is overdue or unsatisfactory;
- (c) history of inadequate financial management accounting practices;
- (d) evidence of untimely expenditures on prior award;
- (e) history of other major capacity issues that have significantly affected the operation of the project and its performance;
- (f) history of not reimbursing subrecipients for eligible costs in a timely manner, or at least quarterly; and
- (g) history of serving ineligible program participants, expending funds on ineligible costs, or failing to expend funds within statutorily established timeframes.
- (h) evidence that the project has previously or currently conducts activities that subsidize or facilitate racial preferences or other forms of illegal discrimination or conduct activities that rely on or otherwise use a definition of sex other than as binary in humans.
- (i) evidence that the project operates drug injection sites or "safe consumption sites," knowingly distributes drug paraphernalia on or off of property under their control, permits the use or distribution of illicit drugs on property under their control, or conducts any of these activities under the pretext of "harm reduction."

*I Certify that my RENEWAL project will pass quality threshold review to apply for HUD CoC funding under the above criteria:*

Signature of applicant: \_\_\_\_\_

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### **Post Award Requirements and Administration (pg. 107-109)**

If your project is chosen for funding in this round of the competition you must agree to follow the applicable provisions in the Administrative, National & Departmental Policy Requirements and Terms for HUD Financial Assistance-2025. You must comply with these applicable provisions:

1. The Fair Housing Act ([42 USC 3601-3619](#)) and Civil Rights laws which encompass the Fair Housing Act and related authorities (24 CFR 5.105(a))
2. Affirmatively Furthering Fair Housing (AFFH) requirements, ([42 USC § 3608\(e\)\(5\)](#)) and implementing regulations at [24 CFR 5.150 et seq.](#) as amended by 90 FR 11020.
3. Economic Opportunities for Low-and Very Low-income Persons ([12 USC 1701u](#)) requirements, including those listed at [24 CFR part 75](#)
4. Compliance with Immigration Requirements (8 U.S.C. 1601-1646; [Executive Order 14218](#))
5. Accessible Technology requirements, ([29 USC § 794d](#), 29 USC 794, 42 USC 12131-12165) and implementing regulations at 36 CFR part 1194 (Section 508 regulations), [24 CFR § 8.6](#) (Section 504 effective communication regulations), 28 CFR part 35, subpart H (DOJ Web Access Rule), and [28 CFR part 35, subpart E](#) (DOJ's Title II communications regulations)
6. Ensuring, when possible, small businesses, minority businesses, women's business enterprises, veteran-owned businesses, and labor surplus area firms receive consideration consistent with [2 CFR 200.321](#)
7. Equal Participation of Faith-based Organizations in HUD Programs and Activities consistent with 42 U.S.C. 2000bb et seq.; 42 U.S.C. 2000d et seq.; 24 CFR 5.109; and Executive Orders 14202, *Eradicating Anti-Christian Bias* and EO 14205, *Establishment of the White House Faith Office*.
8. Uniform Relocation Assistance and Real Property Acquisition Policies Act ([42 USC § 4601 et seq.](#)) (URA) requirements, [49 CFR part 24](#), and applicable program regulations
9. Participation in HUD-Sponsored Program Evaluation (12 USC 1701z-1; 12 USC 1702z-2; 24 CFR part 60; and FR-6278-N-01)
10. OMB Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards ([2 CFR part 200](#))
11. Drug-Free Workplace requirements ([2 CFR part 2429](#))
12. HUD requirements related to safeguarding resident/client files (e.g., [2 CFR 200.303\(e\)](#))
13. The Federal Funding Accountability and Transparency Act of 2006 ([2 CFR part 170](#)) (FFATA), as amended
15. Accessibility for Persons with Disabilities requirements ([29 USC § 794](#)) and implementing regulations at [24 CFR parts 8](#) and [100](#); [28 CFR part 35](#)
16. Applicable Violence Against Women Act requirements in the Housing Chapter of VAWA ([34 USC § 12491-12496](#)) [24 CFR part 5, subpart L](#), and program-specific regulations.
17. Conducting Business in Accordance with Ethical Standards/Code of Conduct, including [2 CFR 200.317](#), [2 CFR 200.318\(c\)](#) and other applicable conflicts of interest requirements
18. [Build America, Buy America \(BABA\) Act](#) procurement purchase requirements
20. Environmental requirements that apply in accordance with [24 CFR part 50](#) or [part 58](#)
22. Unless prohibited by law and to the extent permitted under the Freedom of Information Act (FOIA), your application and post-award content may be released to the public in response to FOIA requests, except to the extent that certain information may be withheld under a FOIA exemption ([5 USC § 552\(b\)](#); [24 CFR 15.107\(b\)](#)). HUD may also share your information within HUD or with other Federal agencies if HUD determines that sharing is relevant to the respective program's objectives.
23. Waste, Fraud, Abuse, and Whistleblower Protections. [41 USC § 4712](#), which includes informing your employees in writing of their rights and remedies, in the predominant native language of the workforce.

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Under [41 U.S.C. § 4712](#), employees of a contractor, subcontractor, grantee, subgrantee, and personal services contractor may not be discharged, demoted, or otherwise discriminated against as a reprisal for disclosing information that the employee reasonably believes is evidence of gross mismanagement of a Federal contract or grant, a gross waste of Federal funds, an abuse of authority relating to a Federal contract or grant, a substantial and specific danger to public health or safety, or a violation of law, rule, or regulation related to a Federal contract (including the competition for or negotiation of a contract) or grant. (See [Federal Contractor or Grantee Protections | Office of Inspector General, Department of Housing and Urban Development \(hudoig.gov\)](#))

24. Implementing Presidential Executive Actions affecting federal financial assistance programs, as advised by the Department, unless otherwise restricted by law: Executive Order (EO) [14219](#) (Ensuring Lawful Governance and Implementing the President’s “Department of Government Efficiency” Deregulatory Initiative); [14218](#) (Ending Taxpayer Subsidization of Open Borders); guidance resulting from the White House Task Force established by [14202](#) (Eradicating Anti-Christian Bias) and the Senior Advisor to the White House Faith Office assigned by [14205](#) (Establishment of the White House Faith Office); [14182](#) (Enforcing the Hyde Amendment); [14173](#) (Ending Illegal Discrimination and Restoring Merit-Based Opportunity); [14168](#) (Defending Women From Gender Ideology Extremism and Restoring Biological Truth to the Federal Government); [14151](#) (Ending Radical and Wasteful Government DEI Programs and Preferencing); and [14148](#) ([Initial Rescissions of Harmful Executive Orders and Actions](#))

In addition:

1. Awards made under this NOFO will not be used to conduct activities that subsidize or facilitate racial preferences or other forms of illegal discrimination, including activities where race or intentional proxies for race will be used as a selection criterion for employment or program participation; or conduct activities that rely on or otherwise use a definition of sex as other than binary in humans [14332](#) (Improving Oversight of Federal Grantmaking).
2. Awards made under this NOFO will not be used to fund, promote, encourage, subsidize or facilitate the use of illicit drugs.
3. Awards made under this NOFO will not be used to fund any project, service provider, or organization that operates drug injection sites or “safe consumption sites,” knowingly distributes drug paraphernalia on or off of property under their control, permits the use or distribution of illicit drugs on property under their control, or conducts any of these activities under the pretext of “harm reduction.” [14321](#) (Ending Crime and Disorder on America’s Streets).
4. All agreements or contracts made with subrecipients under this NOFO must contain the identical terms and conditions as those in the grant agreement issued by HUD.

Any additional or conflicting terms and conditions must be approved by HUD.

*I certify that if my project is awarded funding in the FY25 CoC NOFO Competition, I will comply with all of the above per the CoC Application requirements:*

Signature of applicant: \_\_\_\_\_