# FAQ: 2025 CoCBuilds Grant – Match, Site Control, and Application Requirements

**PLEASE NOTE**: The best source of information remains the official CoCBuilds NOFO and HUD FAQ, which you can find here:

- 2025 CoCBuilds NOFO on HUD.gov
- HUD Exchange CoC FAQs

If anything in this FAQ below conflicts with HUD guidance, HUD's instructions take precedence.

### What can be used as in-kind match for a CoC Program or CoCBuilds project?

In-kind match refers to donated goods, services, land, buildings, or infrastructure that directly support eligible CoC Program activities and would be allowable if paid for with CoC funds. Contributions may come from the recipient, subrecipient, or a third party.

### Examples of eligible in-kind match:

- **Donated services** (e.g., case management, mental health counseling, job training) documented via signed Memorandum of Understanding (MOU).
- Donated goods, such as hygiene kits, furnishings, or medical supplies.
- Donated use of land or buildings for CoC-eligible activities.
- **Donated infrastructure/utilities**, such as internet installation, IT equipment, utility hookups, or security systems.

### Requirements:

- Must support eligible CoC Program activities under 24 CFR § 578.73(c).
- Must be documented in writing (signed and dated MOU or donation letter).
- Must be submitted before grant agreement execution.
- Must be valued according to 2 CFR Part 200 Subpart E: Cost Principles.
- May only be used once—cannot be reused across years or projects.

### Can leased land or existing infrastructure be used as in-kind match?

Yes—**if donated**. The donated use of land, buildings, or infrastructure (e.g., internet or utility services) can be counted as in-kind match if all documentation, valuation, and eligibility criteria are met.

# To qualify:

- Must be **donated**, not leased, or purchased at market rate.
- Must be used for eligible CoC activities.
- Must be documented via MOU or letter prior to grant execution.
- Must have a verified value (e.g., appraisal or market rate comparison).

• Must not be reused for other grants or future years.

### Required documentation:

- Signed donation letter or MOU.
- Description of donated item and how it supports the project.
- Timeframe of use.
- Valuation details.
- Statement of one-time use and CoC eligibility.

### Can land that is already owned or previously purchased count as in-kind match?

**No.** Property that is already owned or was previously purchased by the recipient or subrecipient does not qualify as in-kind match.

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- Property already owned or purchased, even if currently used for the project.
- Property paid for with federal or non-federal funds.
- Use of property without formal donation.
- · Match used in another project or year.

✓ **Only donated real property**—with verified value, documentation, and one-time use—qualifies as in-kind match per 24 CFR § 578.73(c).

# Can donated infrastructure like internet, utilities, or IT systems count as in-kind match?

Yes, as long as it directly supports eligible CoC activities and meets federal documentation and valuation standards.

### Examples:

- Donated internet installation or access.
- Donated utility hookups (e.g., water, gas).
- Donated IT hardware/software or security systems.

#### Required documentation:

- Signed letter or MOU.
- Description of donation and use in the project.
- Timeframe and valuation method.
- Confirmation of one-time use and eligibility.

### What is the site control requirement for 2025 CoCBuilds?

For this funding round, HUD requires proof of site control at the time of application (not later in the process as in prior years).

# Acceptable documentation includes:

• **Deed or lease agreement** (for remodeling or expansion).

 Purchase agreement (for acquiring new property), including location, price, and terms.

You may use HUD Form 9548 - Sales Contract as a template (not required) or have your real estate agent prepare a comparable agreement. A contingency clause stating the purchase is dependent on CoCBuilds funding is allowed.

**Reference:** 24 CFR § 578.25 – Site Control

### What is HUD Form 2991 and when is it required?

HUD Form 2991 – Certification of Consistency with the Consolidated Plan must be completed by all applicants as part of their application materials.

- Only the final selected applicant must submit the signed version to HUD.
- However, all applicants must prepare this form and submit it to WYCoC for internal review during the application process.

Is there a 10% limit on administrative costs—and does it include indirect costs? Yes, the 10% cap on administrative costs applies to this grant. There has been some confusion about whether both admin and indirect costs can be claimed together.

### Until HUD clarifies:

- Grantees should request either administrative costs or indirect costs—not both.
- If you have a Negotiated Indirect Cost Rate Agreement (NICRA), you may claim indirect costs instead of direct admin.

We recommend using caution and selecting one option unless further guidance is provided.

### **Key Regulations and References**

- 24 CFR § 578.73 Match Requirements
- 2 CFR Part 200 Cost Principles & Documentation
- 24 CFR § 578.25 Site Control
- HUD Form 2991 Certification of Consistency
- HUD Form 9548 Sales Contract Template