



Tribal Consultation: Participation in the Continuum of Care Program FY2021 Competition

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Objectives of this Session

This webinar will provide information regarding how Indian Tribes and TDHEs:

- Work with their neighboring CoCs to partner and prepare for the FY 2021 CoC Program Competition.
- How project applications are submitted to a CoC and a general idea of how local CoCs process.
- The project application process and what to expect.
- Using NAHASDA funds towards CoC Program match requirement for eligible activities.

Recap of March 2021 Tribal Consultation

- Need for technical assistance tailored specifically for Tribes and TDHEs to ensure that they are competitive as project applicants
- Concerns about Tribes and TDHEs being able to meet the distinct needs of Tribal members
- Need for HUD to help facilitate connections between Tribes, TDHEs, and CoCs
- Concerns about certain CoC Program requirements such as the 25 percent match, HMIS participation, Coordinated Entry participation

Homelessness and Housing Needs in Tribal Lands

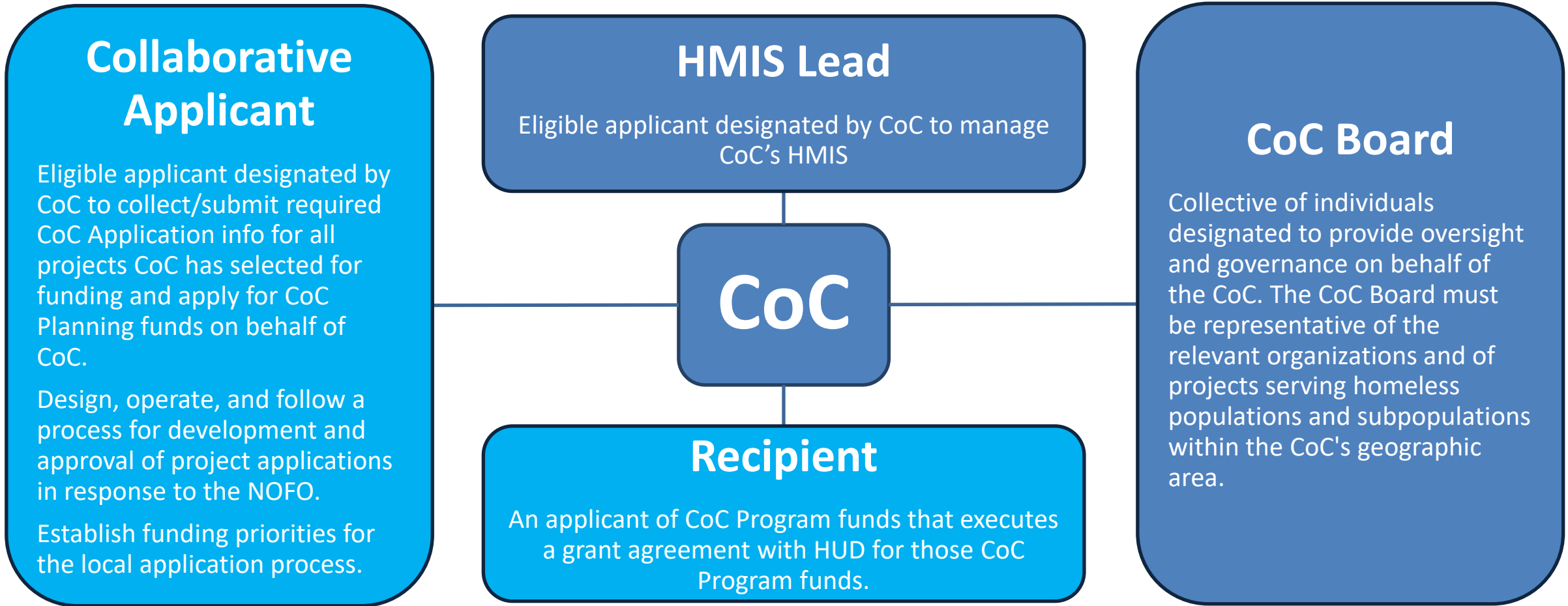
- American Indian and Alaska Native (AI/AN) households disproportionately affected by homelessness
 - Comprise 1.3 percent of U.S. population, make up to 10 percent of persons experiencing homelessness in some areas
- Extent of homelessness in tribal areas is less conspicuous—primarily takes form of persons living in doubled up situations
 - Point-in-Time counts have very limited coverage of tribal areas at this time, so we have much to learn about the extent of literal homelessness among the Native American population

Continuum of Care Program: Competition Overview

Continuum of Care Program - Overview

- Promotes a communitywide commitment to the goal of ending homelessness;
- Provides funding for efforts by nonprofit providers, State and local governments, tribal governments and TDHEs to quickly rehouse individuals and families experiencing homelessness while minimizing the trauma and dislocation caused to homeless individuals, families, and communities by homelessness
- Promotes access to and effective utilization of mainstream programs by homeless individuals; and,
- Optimizes self-sufficiency among individuals and families experiencing homelessness

CoC Program Roles



Responsibilities of Continuum of Care

- CoC Program interim rule establishes the responsibilities of a CoC including:
 - Operating the CoC: Governance, local consultation, establishing performance targets, establish and follow written standards for providing CoC assistance, and establishing and operating a Coordinated Entry system;
 - HMIS: Must designate and operate a Homeless Management Information System (HMIS) and designating a single HMIS Lead to manage it and to ensure that it is administered in compliance with HUD requirements;
 - CoC Planning: Development of a comprehensive housing and service system, and planning for and conducting point-in-time counts; and,
 - Developing a VAWA emergency transfer plan

Responsibilities of CoC Program Recipient

A CoC Program recipient:

- Must participate in coordinated entry system (CES) and may only take referrals through the CoCs designated CES process
- Must enter participant data in Homeless Management Information System (HMIS) on all persons assisted with CoC Program funds
- Must comply with CoC's written standards for providing CoC Program assistance including determining eligibility, prioritization, and rent standards

Continuum of Care Process & Timeline

Collaborative Applicant and Recipients Relationship

The Collaborative Applicant guides application response system for entire CoC.

Collaborative Applicants Must:

- ✓ Collect information on entire geographic area
- ✓ Ensure all projects are part of the coordinated entry system to serve anyone presenting for help
- ✓ Ensure all recipients are entering data in HMIS for reporting

Collaborative Applicants Support Recipients by:

- ✓ Sharing information with all recipients about needs and housing availability
- ✓ CES enables recipients to coordinate with other organizations and find the right placement for the people they serve
- ✓ HMIS enables recipients to keep track of the people they serve and see progress

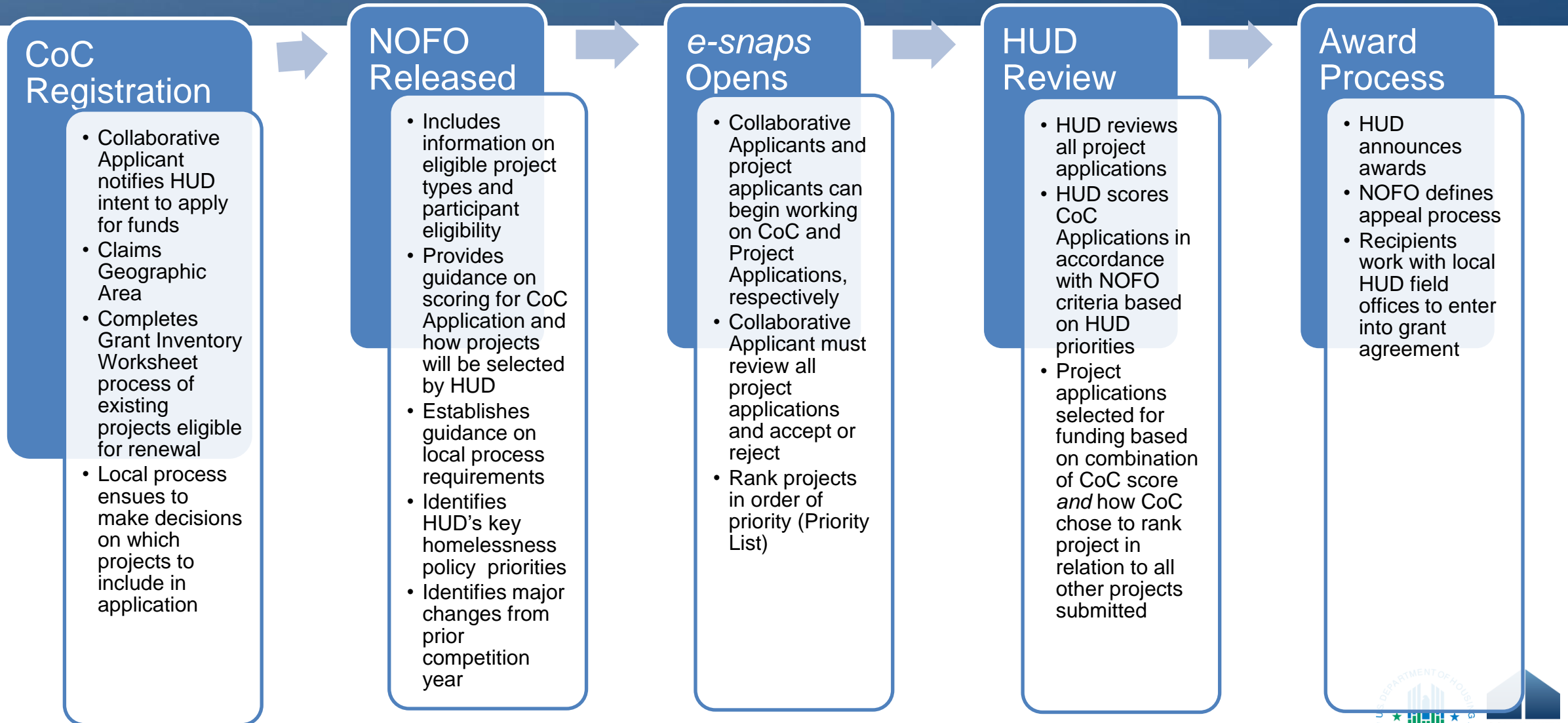
CoC Local Processes

The Collaborative Applicant is responsible for all project applications in the CoC.

Collaborative Applicants Develop Local Processes to:

- ✓ Develop local rating and ranking process
- ✓ Solicit applications
 - Advertise, publish notification that CoC is soliciting project applications
- ✓ Assess existing projects.
 - Use HMIS data; determine performance using system performance measures
- ✓ Identify projects where the CoC will reallocate funds to apply for new projects
- ✓ Review all applications via *e-snaps* and accept or reject applications;
rank each accepted project
- ✓ Submit entire CoC Consolidated Application.

CoC Program Application and Award Timeline



2021 CoC Program Application Timeline

Where are we in the cycle for the 2021 CoC Competition?

- CoC Program Registration has been completed
- NOFO for project applications has not been released

What Does This Mean for Tribes and TDHEs?

- Creating a new CoC for FY2021 Competition is not possible
- CoCs may have already made local decisions including about reallocation and potential bonus projects
- No additional or set-aside funding available specifically for tribes
- Need to connect with CoC to understand their local processes and project priorities

Partnering with Neighboring CoC

- There are 387 CoCs throughout the country
 - Local (comprised of single city/county area)
 - Regional (comprised of more than one geographically contiguous city/county area)
 - Balance of State (comprised of many counties within a state; not geographically contiguous)
 - Statewide CoC (comprised of all counties within a state)
- Information on CoCs—including maps of coverage area and contact information—can be located at: [Grantee Contact Information - HUD Exchange](#)

Preparing for FY2021 CoC Program Competition

What Does This Mean for Tribes and TDHEs interested in applying in 2021?

- **Determine which CoC to contact**

How many CoCs are adjacent to the Tribal geographic area?

If more than one, which one has more funding?

Do any existing Tribal community housing and service organizations have a relationship with organizations in the CoC area?

- **Engage and partner with the CoC**

What is their local process for identifying and assessing projects?

Where are they in the process?

Are they accepting new applications? Is the CoC planning to reallocate funds this year and support new projects?

- **Discuss options**

Does the CoC have enough HMIS funding for software and licenses for Tribe/TDHE grantees?

Will they train staff on using HMIS?

Would the CoC be able to expand its coordinated entry system to include potential clients from the Tribal community?

Eligible Projects & Funding



Types of Projects Eligible for Funding in the CoC Program

- **Permanent Supportive Housing**
- **Rapid Re-housing**
- **Transitional Housing**
- **Joint Transitional Housing-Permanent Housing: Rapid Re-housing**
- **Supportive Services Only – Coordinated Entry**
- **Homeless Management Information Systems (HMIS)**

Project Types Overview: Housing Projects

Project Type	
Permanent Supportive Housing	<ul style="list-style-type: none"> • Household must include a disabled household member, most typically adult head of household • Lease is required and must be for a term of at least one year, renewable • May be single site, scattered sites or clustered, and can be integrated with affordable or market-rate units • Services must be offered, type may vary depending on the needs of the residents • Dedicated and DedicatedPLUS PSH include additional requirements related to length of time homeless and where participants need to have resided
Rapid Re-housing	<ul style="list-style-type: none"> • Funds may be used to provide supportive services and short- or medium-term tenant-based rental assistance. • Projects may provide a maximum of 24 months of rental assistance. • Lease is required for all PH: RRH and must be for a term of at least one year.
Transitional Housing	<ul style="list-style-type: none"> • All program participants must sign a lease, sublease or occupancy agreement for a period of at least one month. • Leases/occupancy agreements must be automatically renewable upon expiration, except on prior notice by either party, with a maximum term of 24 months. • Must provide access to supportive services the entire time participants reside in TH • Services may also be provided to former TH residents for up to six months after leaving TH.
Joint Transitional Housing-Permanent Housing: Rapid Re-housing	<ul style="list-style-type: none"> • Must offer both transitional housing and rapid rehousing. Not everyone needs to be enrolled in both • TH portion has the same requirements as project with only TH. • RRH portion has the same requirements as project with only RRH.

Who Can be Served in CoC Program Projects?

- All individuals and families that receive assistance under the CoC Program must meet the eligibility requirements for the project in which they will be receiving assistance.
 - Must meet Definition of Homeless + additional eligibility criteria set forth in the FY NOFA under which project is awarded
- Must comply with Fair Housing laws and may not limit or exclude based on protected classes
- Must serve only participants referred through CoC's CES based on CoCs prioritization written standards

Project Applications



Types of Project Applications

- Renewal Project Application
 - Application from an existing project
 - Budget based on prior year's
- New Project Application
 - New application for a project that is new or existing but previously had no CoC Program funds
 - Reallocations
 - Bonus funds (sometimes DV)
 - Most relevant: Housing and services activities: RRH, PSH, Joint TH-PH: RRH

e-snaps

How are applications submitted? *e-snaps*

- Grant application system for CoC Program
- CoC Collaborative Applicants and Project Applicants both use *e-snaps* to submit applications
- Project applications submitted go to the Collaborative Applicant
- Collaborative Applicant submits all applications to HUD
- Resources available:

https://www.hud.gov/program_offices/comm_planning/coc/competition

General Components of the Project Application

- SF-424
- Project Detail
- Project Description
- Budget Screens

Using NAHASDA Funding as Match

Match:

- Must be spent on eligible costs
 - Would you be able to use CoC Program funds to pay for it?
- Must be contributed to the grant
 - Does the activity benefit the specific project and who is served?

Resources

- Guide to grant requirements:
<https://files.hudexchange.info/resources/documents/CoCProgramGrantsAdministrationUserGuide.pdf>
- Online training of grant requirements:
<https://www.hudexchange.info/trainings/courses/coc-program-grant-administration/>

Next Steps

- FY 2021 CoC Competition
 - The FY 2021 NOFO will include Tribes and TDHEs as eligible recipients
- Upcoming technical assistance opportunities
- HUD continues to welcome your comments and recommendations submitted to: CoCTribalConsult@hud.gov

Discussion Session

Please share your:

- Name
- Title
- Tribe that you represent

Discussion Session

- What do you anticipate are Tribes' and TDHEs' greatest technical assistance needs as CoC Program project applicants?
- In what ways can HUD help facilitate partnerships between Tribes, TDHEs, and Continuums of Care?
- How can HUD best represent Indian areas and the needs of Tribal members in the new formula being developed to include Tribes?
- What policies should CoCs consider to ensure that coordinated entry processes are adapted to meet the unique needs of Tribal members?

Thank you

Please submit comments regarding the FY 2021 CoC competition within 30 days (CoCTribalConsult@hud.gov). Information on prior NOFAs can be accessed on the HUD Exchange here:

<https://www.hudexchange.info/programs/coc/>

SNAPS will continue accepting your comments on an ongoing basis.