



# Tribal Consultation: Continuum of Care Program FY2022 Competition

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# Office of Community Planning and Development (CPD)



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CoC Program Homepage: [https://www.hud.gov/program\\_offices/comm\\_planning/coc](https://www.hud.gov/program_offices/comm_planning/coc)

Mailbox: [CoCTribalConsult@hud.gov](mailto:CoCTribalConsult@hud.gov)



# Objectives of this Session

- Provide an overview of anticipated changes to the FY 2022 Registration process related to the inclusion of Tribal Areas
- Highlight the process for the FY 2022 CoC Program Competition and application process
- Introduce the Youth Homelessness Demonstration Program (YHDP) and a potential funding opportunity to target Unsheltered Homelessness & Rural Homelessness
- Solicit feedback from Tribes regarding their current experiences participating in the CoC Program
- Gain insight and recommendations from Tribes regarding the registration and application process for the FY 2022 CoC Competition

# Recap of 2021 Tribal Consultation Sessions

Past consultation sessions were held on 3/24/21 and 5/25/21.

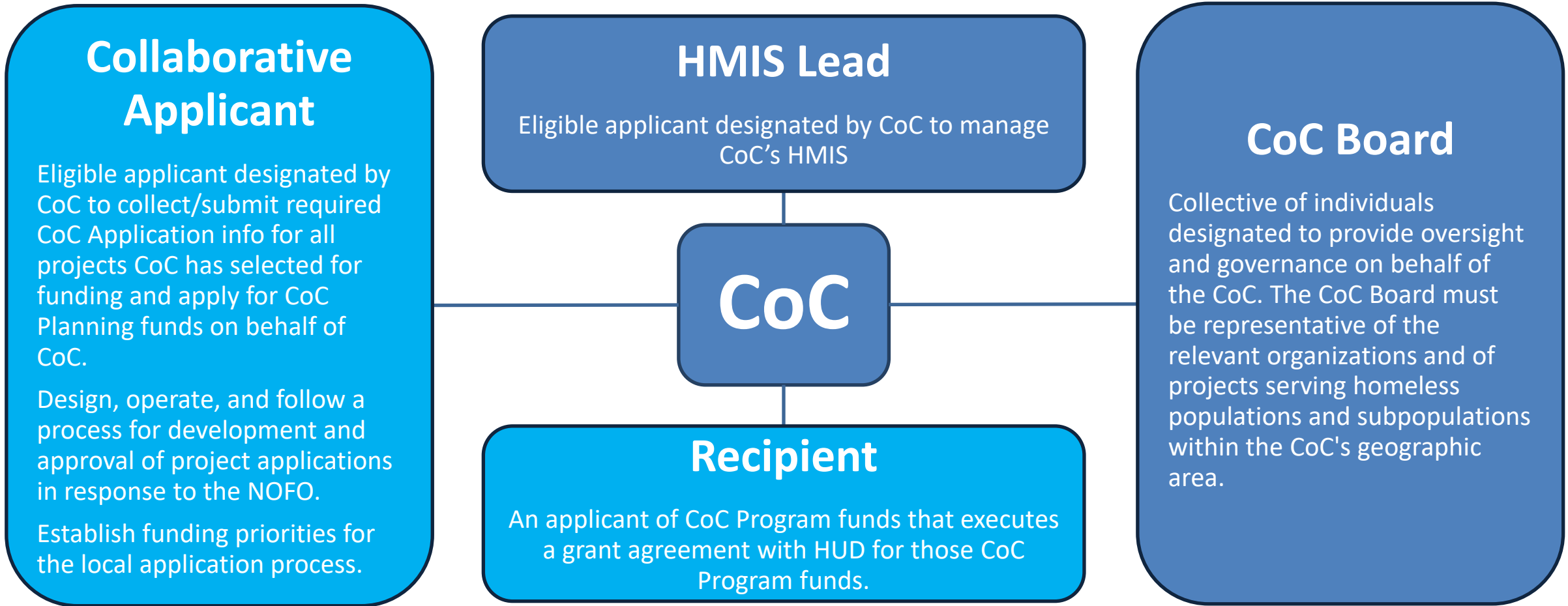
Valued feedback included:

- 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

# 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

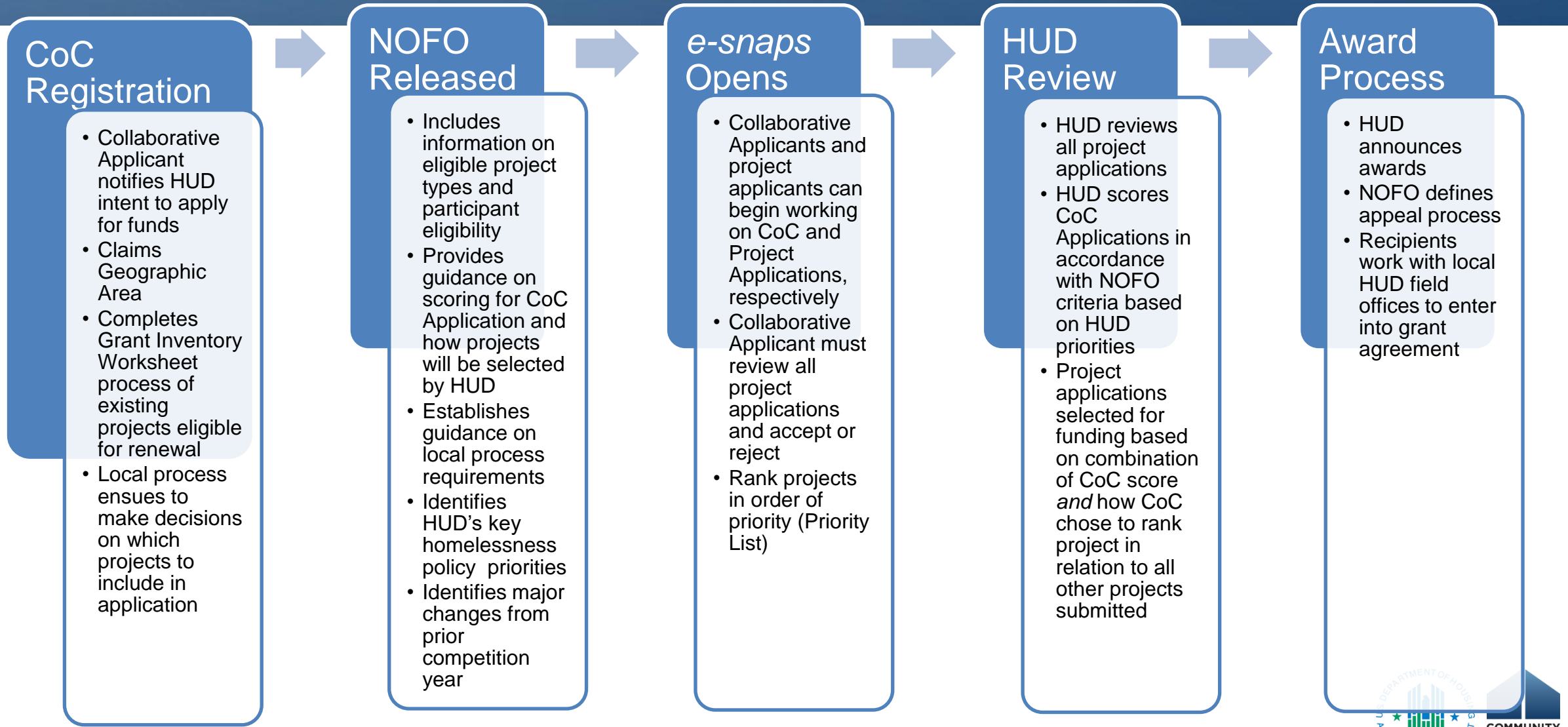
# CoC Program Roles



# Continuum of Care Program FY 2022 Competition Process & Timeline



# CoC Program Application and Award Timeline





# 2022 CoC Program Registration

- During registration, Collaborative Applicants review available geographies and confirm which are claimed as part of the CoC's geographic area.
- HUD will publish Geographic Codes with Preliminary Pro Rata Need (PPRN) amounts for all formula areas (including reservations or trust land) available to be assigned to CoCs during FY22 Registration process.
- A Tribal resolution is required to permit an existing CoC to claim reservation or trust land as part of the CoC's geography (not required for Tribes or TDHEs).
- [Continuum of Care Program Registration Notice](#) is posted on HUD.gov

# 2022 CoC Program Registration

## What does this mean for Tribes and TDHEs?

- Tribes or TDHEs may serve as Collaborative Applicants for an existing CoC.
- Tribes or TDHEs may register as Collaborative Applicants and claim geographic areas in their IHBG formula areas
- An existing CoC can elect not to select previously-claimed geographic areas that includes a portion of a Tribe's IHBG formula area so a Tribe or TDHE may serve that geography under a newly-formed CoC;

# 2022 CoC Program Registration

- Existing CoCs may claim geographic areas in IHGB formula areas (with Tribal resolution) in areas where a Tribe, TDHE, or other eligible entity intends to apply for projects through an existing CoC.
- A Tribe or TDHE may approve the subdivision of trust land or reservation among more than one CoC (including an existing CoC or CoC newly formed by the Tribe) through a Tribal resolution

**NOTE:** Changes made to CoCs' geographic areas to include formula areas during the FY 2021 Competition do not carry over for FY 2022

# Eligible Projects & Funding



# Continuum of Care Applicant Expectations

- The Continuum of Care establishes a local competition to rate and rank projects.
- Applicants submit a project application to their CoC and the CoC either rejects it or accepts and ranks it based on the rating and ranking process.
- The CoC submits a CoC application and all project applications to HUD for review.
- HUD reviews project applications to ensure they meet threshold requirements and scores the CoC applications.
- Project applications can be funded based on a combination of CoC score and how the CoC ranked the project.

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

# 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. Legislation is being proposed that would permit Tribes to carry out activities on or off reservations or trust lands without the Fair Housing requirements being applicable.
- Must serve only participants referred through CoC's CES based on CoCs prioritization written standards



# What is YHDP?

Demonstration program to show how a comprehensive approach to serving homeless youth, age 24 and under can dramatically reduce youth homelessness

## Awarded:

- Round 1: \$33 million to ten communities, four of which are rural
- Round 2: \$43 million to eleven communities, five of which are rural
- Round 3: \$75 million to 23 communities, eight of which are rural
- Round 4/5: \$143 million to 33 communities, 10 of which are rural

Upcoming funding: \$72 million for up to 25 communities with a priority for up to 8 communities with a substantial rural population

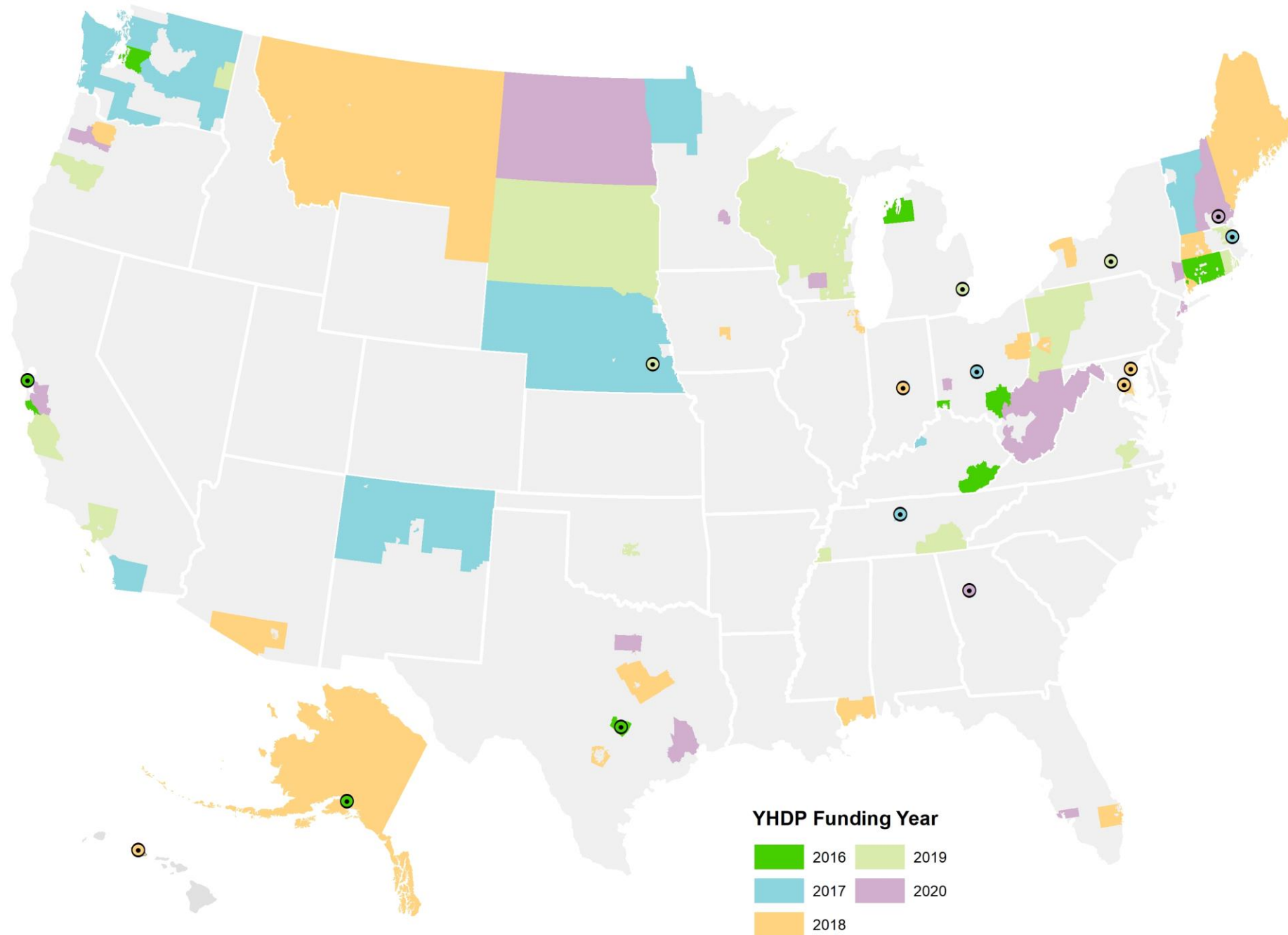


# What YHDP Requires

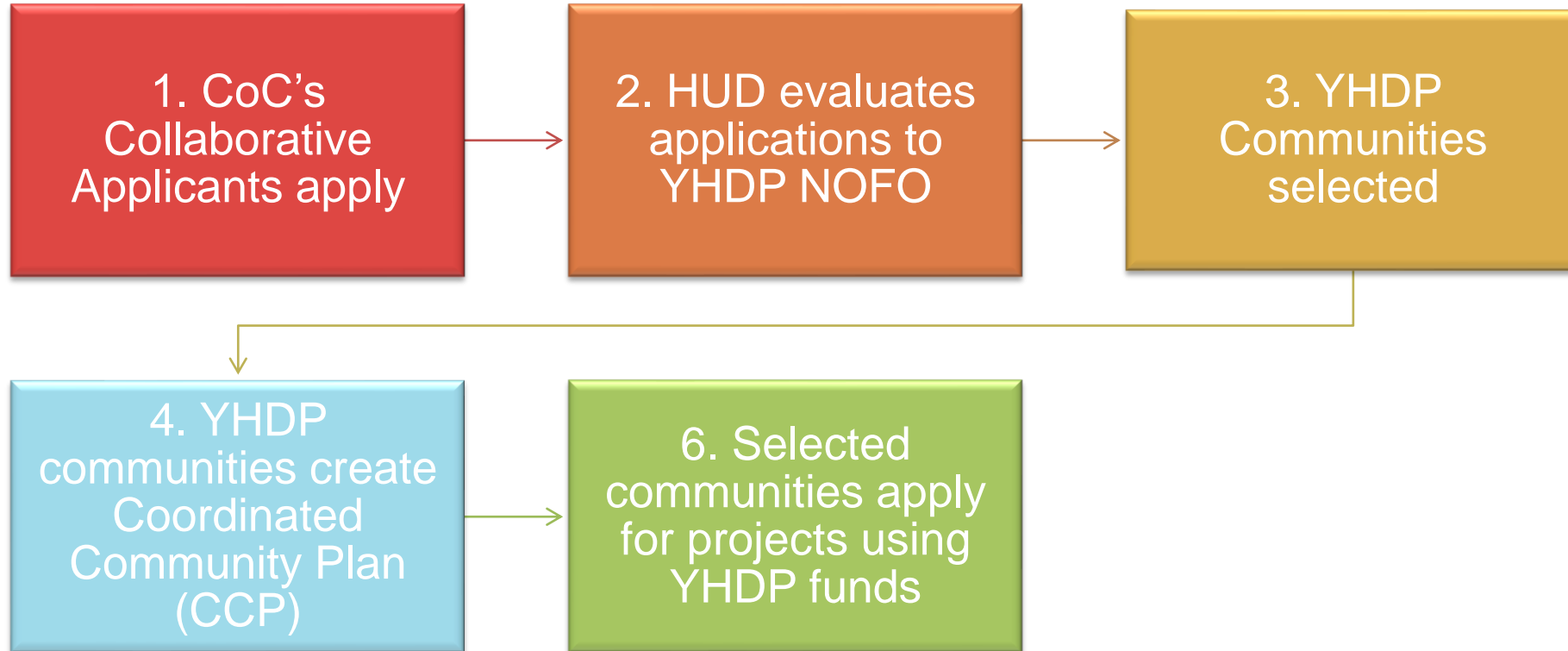
Creating a comprehensive plan to address youth homelessness in the community

- Needs assessment, including housing, education and employment, and social and emotional well being
- Partnerships across a diverse group of stakeholders
- Addressing core principles, including Housing First, Positive Youth Development, and Trauma-Informed Care

Developing innovative projects to address youth homelessness



# Overview of YHDP Process



# Discussion Session

Please share your:

- Name
- Title
- Tribe that you represent

# YHDP Questions

- What organizations are focusing on youth homelessness in Tribal areas?
- What partners are critical to effectively address youth homelessness in Tribal areas? In non-Tribal areas?
- A critical component of YHDP is the Youth Action Board (YAB), which ensures that youth with lived experience lead the work. How can HUD facilitate the membership of Indigenous youth on the YAB?

# Unsheltered Homelessness and Highly Vulnerable Populations in Rural Areas

- Unsheltered homelessness continues to rise in many areas of the country and a recent analysis of homelessness data shows that people experiencing unsheltered homelessness report significantly greater health challenges than their sheltered peers.
- In rural areas, though, homelessness can present differently than it does in urban and suburban areas and unique strategies are often necessary to resolve homelessness for highly vulnerable populations.

# Unsheltered Homelessness and Highly Vulnerable Populations in Rural Areas

- HUD is considering funding opportunities that will help communities address both unsheltered homelessness and homelessness in rural areas.
- Any funding will likely be released competitively, generally following the CoC Program requirements. Tribes will be eligible to apply following the rules of the CoC Program.



# Unsheltered Homelessness and Highly Vulnerable Populations in Rural Areas

- When considering the creation of potential funding opportunities, HUD is particularly interested in Tribal feedback on:
  - What resources are needed to reduce homelessness in Tribal areas?
  - What interventions are most effective at reducing homelessness amongst those experiencing unsheltered homelessness in Tribal areas? For those who are not unsheltered, but remain highly vulnerable?
  - Is there anything HUD could include in a NOFO that would be helpful (or not helpful) for Tribes in addressing homelessness in Tribal areas (e.g., limiting or expanding eligibility requirements; allowing certain types of interventions to be funded)?

# Developing Partnerships



# Partnering with a Neighboring CoC

- Information on CoCs—including maps of coverage area and contact information—can be located at: [Grantee Contact Information - HUD Exchange](#)
- There are **691** Tribes and Tribal Organizations throughout the country where a portion of their area (non-reservation or trust land) that may overlap with **132** CoCs
- HUD created a map showing the overlapping areas
- HUD has encouraged CoCs to reach out to neighboring Tribes.

# Preparing for FY2022 CoC Program NOFOs

- **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?

# Preparing for FY2022 CoC Program Competition

- **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?
  - Is the CoC willing to partner with the Tribe in adjusting coordinated entry processes and written standards?

# Discussion Session

- For those Tribes that participated in the FY 2021 CoC Program competition, what was your experience?
- What are Tribes' greatest technical assistance needs currently?
- What are your recommendations about what HUD can do to better facilitate partnerships between Tribes and existing CoCs?
- We welcome any comments or recommendations related to the:
  - CoC FY 2022 Registration and Competition
  - Youth Homelessness Demonstration Program
  - A potential funding opportunity for Unsheltered Homelessness & Rural Homelessness

# Thank you

Please submit comments regarding the:

- FY 2022 CoC Program Competition
- Youth Homelessness Demonstration Program (YHDP), and
- Unsheltered Homelessness and Rural Homelessness NOFO

within 30 days ([CoCTribalConsult@hud.gov](mailto: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.