



U.S. Department of Housing and Urban Development

Continuum of Care Tribal Consultation

January 11, 2022

Introducer: Welcome and thank you for joining today's Tribal Consultation: Continuum of Care FY 2022 Competition. Before we begin, please ensure that you have opened the WebEx chat panel by using the associated icon on the bottom right corner of your screen.

Please note all audio connections are muted until the comment portion of the call. You may submit written comments throughout the presentation, and these will be addressed during the comment period. To submit a written comment, select all panelists from the dropdown menu in the chat panel, enter your comment in the message box provided and send.

If you require technical assistance, please send the chat to the event producer. With that, I'll turn the conference over to Jemine Bryon, deputy assistant secretary for the office of special needs at HUD. Please go ahead.

Jemine Bryon: Thank you and good day everyone and thank you for being here today. I'm really honored to be joining you again for our tribal consultation. This is our third session. This one will be focused on participation of our tribes and tribally designated housing entities in the Continuum of Care Program, the CoC Program,

I think as everybody knows, the fiscal year 2021 Consolidated Appropriations Act expanded available resources in the CoC program to Indian tribes and TDHEs to address homelessness. We are committed to working with you to ensure access to these resources for your communities.

Joining me today from my office of Special Needs Assistance Programs known as SNAPS is Norm Suchar. He's a director of SNAPS and several of our staff, including Robert Waters, Nili Soni, Caroline Kraus, [inaudible 00:01:48], Marlisa Grogan.

Also joining us are our partners from the office of native American programs in PIH. We have Heidi Frechette, the DAS for ONAP, Jad Atallah, the director of the office of performance and planning within ONAP, and Miss Iris Friday, a native American program specialists. Thank you all for not only joining today, but your

continuing partnership and tremendous support for us. Thank you so much.
Next slide.

While our first due consultation sessions in March and May of 2021 provided an overview of the CoC program, more specific detail about the FY 2021 competition and application process. We are looking forward to hearing your feedback, comments, recommendations regarding the upcoming FY 2022 CoC program competition, including the registration process and also our youth homelessness demonstration program and we'll also talk about a potential funding opportunity to specifically target unsheltered homelessness and rural homelessness.

So again, these are goals for today, and we'll begin by providing a formal presentation on anticipated changes to the fiscal year 2022 registration process related to the inclusion of tribal areas. And an overview of the process of the FY 22 CoC program competition and application process. We'll then provide the introduction of YHDP. And we'll talk about the unsheltered homelessness and rural homelessness opportunity.

After each session, section, sorry, we will ask for your feedback and identify some specific topical questions that we would really appreciate be included in any of your comments. Before ending today, we'll also ask you for your feedback regarding your current experiences participating in the CoC program thus far. So we've got a lot on our agenda for the next two hours. Why don't we get started and let me turn it over to Norm Suchar?

Norm Suchar:

Thanks so much, Jemine. Let's move to the next slide please.

Great. So Jemine already kind of covered this, but we had some prior consultation in March and May of last year. We got some incredible feedback, including on the need for technical assistance. This is something we've been working on. The special concerns people had about meeting the very unique needs of tribes and TDHEs and to meet the distinct needs of the tribal members.

So, and also a lot of really great feedback about strategies for connecting Continuum of Care and the leadership of Continuum of Care with tribes TDHEs and the leaders of those tribes and TDHEs. And then we got a lot of feedback on specific program requirements. And so we just want to both say that we appreciate the comments we've gotten so far and also really encourage more of the same. The more feedback we get, the easier it's going to be for us to really sort of dive in and make this program work as well as can be.

So let's move to the next slide, please. I want to start by giving an overview of how the Continuum of Care work and the responsibilities of the Continuum of Care. So coming up on this next slide here, which hopefully will show up in a second here. Great. You can kind of see the response- Oh, not there. Let's go back one. Sorry, slide five. Sorry about that.

You can kind of see spelled out the responsibilities of a Continuum of Care, but I want to sort of go a little deeper into these. The primary responsibility of a Continuum of Care is to operate the homeless assistance, planning and coordination within that community.

So that includes having a governance system so that the Continuum of Care can make decisions. It means consulting with the various stakeholders and partners within the community. It means establishing performance targets, establishing policies and procedures for how assistance is going to be provided to make sure it's fair and equitable and as impactful as possible. And it means establishing what's called a coordinated entry system, which is a process by which people can access homeless assistance through a simplified method.

Some people use phones, some people use physical locations. Most communities use a combination of both, but what coordinated entry tries to avoid is the process by which people have to sort of call around to every program in order to get help. You want the help to be as integrated and as comprehensive as possible, but also as easy to access as possible.

Another responsibility of the Continuum of Care is to manage and operate a homeless management information system, so we use HMIS as the acronym, but that's the data system that is used in homeless assistance programs and HUD sets standards for how an HMIS has to operate and what data it has to collect, but communities actually procure their own HMIS generally through the private market and make sure it's up to HUD requirements and standards, and that's how data is reported to HUD, data on performance, but it's also how communities can really use data locally to identify how best to provide homeless assistance and to identify where their needs are.

The CoCs are also responsible for planning. That means things like identifying new funding sources, coordinating with other systems of care, like the healthcare system, like mainstream housing providers, et cetera, and see Continuums of Care are also responsible for developing a VAWA is the Violence Against Women Act. Under the Violence Against Women Act Continuums Of Care are required to create a process by which someone who is fleeing domestic violence can transfer from one program to another, to make sure that they can flee abuse as quickly, expeditiously and simply as possible.

So those are the major responsibilities of Continuum of Care. Of course, Continuums of Care are always looking for to do better homeless assistance and to identify opportunities to partner with different entities and organizations in order to make their homeless assistance work better.

So let's go to the next slide. And we have a nice chart here that will kind of show the different roles within a CoC. So there are entities that we're going to be talking about here, and we wanted to sort of describe what each of them are.

So a collaborative applicant that is the entity that does sort of the administrative work on behalf of a Continuum of Care. They're the ones who are responsible for submitting applications for funding to HUD. They're the ones that generally communicate with as a first step when communicating with a community about their homeless assistance and they are generally sort of responsible for making sure all the stuff within the Continuum of Care is sort of getting done.

The HMIS lead is the entity that is responsible for administering the Homeless Management Information System, that data system that I just talked about. The Continuum of Care board is a decision making entity and CoCs are required to create a board. They can delegate as much or as little authority to that board as they'd like, but the board should be representative of the various stakeholders, especially people who have experienced homelessness in the community, but also the various other stakeholders with an interest in preventing and ending homelessness in the community.

CoC boards typically have sort of local leadership, people from the faith community, people with experience of homelessness, providers, but it really should sort of be a mirror of the community and it should look like the community.

And then the recipient is the entity that actually receives funding from HUD through a grant. So they're the ones who are receiving funding, generally either operating a project or sub-granting to a different entity to operate a project.

So all these are different roles within the Continuum of Care. And one thing I should mention that as you get into this world of homeless assistance, the word Continuum of Care gets used in a lot of different contexts. So sometimes we talk about it as the geographic area that is covered by a Continuum of Care. Sometimes we refer to it as the program, the Continuum of Care Program, but generally what we mean is we mean the broad group of stakeholders with an interest in homelessness in the community. They're the ones who are getting together, going to meetings, getting together, planning, doing the work of trying to end homelessness in the community.

So we're going to go to the next slide. I'm going to turn things over to Robert Waters, and he's going to dig into the process a little more and talk about the timeline. Robert, over to you.

Robert Waters:

Great. Thank you, Norm. Hello, everyone. I'm Robert Waters, Special Needs Assistance Program specialist in the SNAPS office. Today I'm going to briefly go over the 2022 competition process and the timeline, and I'm going to follow that up with a general overview of the upcoming 2022 registration process. Next slide.

All right. Here's a good illustration of the CoC program competition timeline. The CoC registration step is the first step in preparation for the CoC program competition. This step is where the CoCs notify HUD of their intentions to apply for CoC program funding and selects the geographic areas that make up the CoC service area.

Around this time, we also embark on the grant inventory worksheet, review an assessment process. We call it the GIW. This is where CoCs work with HUD to determine which expired projects are eligible to renew in the upcoming competition. CoCs use this inventory of eligible renewal grants to make decisions about which projects will renew or will be reallocated to create new projects during the upcoming competition.

Not long after the GIW process ends the corresponding fiscal year CoC program notice of funding opportunity is published. This is called the NOFO. This provides CoC stakeholders with a specific criteria for applying for Continuum of Care funding during a competition.

When the competition officially begins, HUD opens e-SNAPS, which is our electronic method for submitting applications and reviewing projects. So collaborative applicants again, which is the organization designated by the CoC to report to HUD and to submit the consolidated application and it's also open to project applicants to submit applications for funding.

During this process, collaborative applicants work on their own CoC applications and reviews project applications submitted by project applicants. The collaborative applicant must collect and combine all applicant information for the CoCs, I should say, consolidated application. This includes collecting the project applications, accepting and rejecting the projects, and ranking the applications that are received.

Then the collaborative applicant submits the entire package to HUD for review. During the HUD review process, HUD reviews the project applications and the CoC applications to ensure they meet threshold requirements and scores the applications accordingly. Project applications can be funded based on the combination of the CoC score in their application and how the CoC ranked the individual project.

During the award process, HUD conditionally awards projects that meet HUDs requirements later in the year, and recipients of these projects enter into grant agreement after all conditions such as environmental review are met. Next slide.

All right. As the start of the 22 competition timeline quickly approaches, the next couple slides I'd like to provide a little more information on the first step, and that's the 2022 registration. The Consolidated Appropriations Act of 2021 made changes to Title IV, section 435 of the McKinney-Vento Act to allow Indian

tribes and TDHEs to be collaborative applicants, eligible entities, or sub-recipients of the CoC program.

Additionally, these updates, these amendments, I should say, allow IHBG formula areas, including trust land, and reservations to be included in geographic areas claimed under the CoC program. The statutory change gives formula areas the same meaning as in the Indian Housing Block Grant Program and it gives the term Indian tribe the same meaning as in section four of the Native American Housing Assistance and Self Determination Act in 1996.

But in addition, these amendments required HUD to make revisions to the standing CoC program registration notice that provides collaborative applicants with the detailed information necessary to register for the CoC program in preparation for the competition, as I said earlier. The registration notice is currently published on HUD's website and it'll be available on the CoC program's competition page shortly. So it was just published on January 3rd. So all these revisions can be found on HUD's website, and I encourage you all to take a look at it to see what goes into the process of registering for the CoC program.

It's important to note that CoC's are not permitted to claim reservation or trust land as part of their CoC's geographic service area without travel resolution from the applicable Indian tribe, authorizing the CoC to claim that trust line or the reservation is part of the CoC. So tribes or TDHEs that are designated as collaborative applicants of the CoC, they're not required to show proof of a tribal resolution to claim their own land as their [inaudible 00:18:26] or the reservation for their own formula area in that CoC. So the tribal resolution process, again, want reiterate is only necessary if the tribal area will be included within an existing CoC. All right. Next slide.

So what does that mean for tribes and TDHEs? Tribes or TDHEs may serve as the collaborative applicant for an existing CoC, or they may register as collaborative applicants for newly formed CoC and claim the geographic areas in their formula area.

So an existing CoC can elect not to select previously claimed geographic areas that include portion of a tribe's formula area. So a tribe or TDHE may serve that geographic area under a newly form CoC. So HUD is also looking at have options for delineating the geographic areas that include portions of a tribe's formula area. So HUD and the collaborative applicants can quickly determine which of these areas can be claimed by the CoC, or which areas cannot be claimed by the CoC unless the collaborative applicant is a tribe, TDHE, or they receive a tribal resolution from the applicable Indian tribe that authorizes them to claim that area. Next slide.

Establishing the CoC takes time, so some tribes or TDHEs may elect to join existing CoCs and apply for funding as project applicants. Tribes or TDHEs that elect to join an existing CoC may also be selected by CoC stakeholders to serve

as the collaborative applicant for the entire CoC, including the reservation or trust land area.

It should also be noted that joining existing CoC does not preclude the tribe or TDHE from later splitting from the CoC to establish a new CoC in future funding years. And all of this information is available on our HUD.gov website, and we're always available to help everyone, help you along the way throughout these processes.

A tribal resolution may designate subdivisions of trust land or reservations to be split among more than one CoC, including an existing CoC or a new CoC formed by the tribe. HUD encourages existing CoCs to work with Indian tribes and TDHEs to ensure that any subdivision does not result in competing CoCs. The provisions at section 578.35D of the CoC program interim rule concerning competing CoC, that does apply in this situation and there's a process for ensuring that that doesn't happen. So we have, again, a lot of information published on how to avoid that circumstances, those circumstances.

Finally, I'd like to note that collaborative applicants that made changes to their CoCs claimed geographic areas to include formula areas during the 21 competition was carefully review the updated CoC program registration notice, and the geographic areas to be claimed by the CoC during the 2022 process.

Because the FY 21 selections do not carry over the FY 2022, the CoCs must make those selections again if they receive the tribal resolution to claim those areas. So I hope this information provided was very helpful, and I look forward to working with you all in the near future. So at this time, I think it's back to you, Norm.

Norm Suchar:

Thanks, Robert. I think we're turning things over to, well, to me next, so can we move to the next slide, please? We're going to talk about what kinds of things you can use CoC funding for. So what projects are eligible and what can the funding actually do? So let's move on to the next slide, please. And I want to start by talking about our expectations of applicants and the application process.

So the Continuum of Care funding process is actually kind of an interesting process because there is both a local competition and a national competition. So the first step in the funding process is that after HUD publishes the NOFO that Robert talked about, a Continuum of Care will set up a local process to rate and rank projects. We encourage communities to use performance-based criteria and objective criteria, but the types of criteria that a Continuum of Care uses to rank their projects is largely up to the members of the community, so we see a lot of different approaches for deciding how to rate and rank projects.

So the community sets that up first, and then individual applicants will develop applications for specific projects, like you might create a housing project or a

supported services project, and they fill out applications to essentially apply for those projects. The applications are pretty straightforward. They just ask for what's the budget going to look like? What kinds of things are you spending it on? How will the project operate, et cetera? And obviously ask about information about the app-

Norm Suchar:

And obviously ask about information about the applicant. Then the individual project applicant submits that to the Continuum of Care, and the Continuum of Care can set up a ranking committee or sometimes, they'll just have a checklist that they'll use or there are a lot of different approaches but, the CoC will actually look at all the applications and rank those applications. Then the CoC is going to submit to HUD, all those applications ranked in the order that the CoC wants to see them funded. If the CoC is going to apply for 10 projects, then they'll rank them one to 10.

In addition to that as Robert mentioned there will be, an overall application for the entire community that describes not just the individual projects but what's the community's overall strategy and overall performance for around homelessness. So we call that larger community application, we call that the CoC application and the individual project applications we call project applications. And then, so once all that is submitted to HUD, HUD goes through an extensive review process to review all of the Continuum of Care applications, all of the project applications, to score them all and then to decide how much funding each community is going to get and how much funding each project is going to get.

So that's sort of a broad overview of the process. So let's go to the next slide please and I want to talk about the types of projects that are eligible for funding. So I'm going to talk right now about what was eligible for funding in the 2021 Continuum of care [inaudible 00:26:52]. These sometimes change from year to year, occasionally Congress gives HUD funding for new types of projects, but this has been a pretty consistent list of projects that communities can apply for.

And I'll just go over these very, very briefly, but we have a lot of materials on our website that describe these in much more detail. So Permanent Supportive Housing is one that is, a type of project that provides rental assistance or some other housing assistance plus wraparound support of services, it's designed to serve people with significant disabilities that need a lot of help to live in permanent housing.

Rapid Re-housing is a shorter term intervention, it's for up to two years, it provides again both, housing assistance, generally in the form of rental assistance, and some supportive services including help with locating housing to move into and negotiating with [inaudible 00:27:52].

Transitional Housing, there are a lot of different types of Transitional Housing but it tends to be facility based housing, people can stay for up to two years, they receive supportive services, and then they move out.

Joint Transitional Housing and Rapid Re-housing project as the name implies, that just combines the Rapid Re-housing program model and the Transitional Housing program model. This is something we've been very excited about it's fairly new, but the point of these is to provide both a place that somebody can safely stay, but also to help them move out and move into their own housing as quickly as possible. So the goal of that joint component project is to provide both the safety and security of a location where someone could stay for as long as they need, but typically for a short period of time and also to help them move to their own housing with support and supportive services.

We have a project type that we call supportive services, all our projects provide Supportive Services, but the Supportive Services only projects, do not have a housing component. Generally we fund these for a Coordinated Entry, like the Coordinated Entry I mentioned before, to help people access assistance.

And then we also have grants to help support the data system, the HMIS. So moving on to the next slide please. Again here's a little more detail, I'm not going to walk through this slide, but it does provide a little more detail about each of those different types of housing projects. I mentioned some of this, just now but this gives you a little more detail about how each of the projects works and some of the additional requirements in those projects.

One thing I should say about Permanent Supportive Housing, is we have really targeted it to people who have long term experiences in homelessness, at least one year of homelessness either in one consecutive spell or broken up into four spells over the past three years. And again, people have to have a disability and they typically have multiple disabilities.

So let's go to the next slide please and I'm going to talk about the eligible populations who can be served by these projects. So, anybody who's served by a project funded by the Continuum of Care must meet certain eligibility requirements. For the vast majority of people that means they have to meet the definition of homelessness, and there may be additional eligibility criteria in a particular [inaudible 00:30:50] or for a particular type of project. So for example I mentioned that people served by Permanent Supportive Housing have to have a disability. So the definition of homelessness in our HUDs homelessness programs includes several different categories. It includes people who are staying in an unsheltered location, which might be a vehicle, an abandoned building, outside, in a tent, situations like that.

It includes people who are staying in an emergency shelter or Transitional Housing program. It includes people who are losing their housing in the next 14 days and have no other place to go. It includes people fleeing domestic violence, and under certain circumstances it can include people who are couch surfing.

There's a lot of detail involved in that one so I won't go into that here, but if you have any questions about it please, feel free to reach out to us. We have some information both in the [inaudible 00:31:52] and on our website about, all these eligibility categories but that gives you a sense of who can be served by these homeless assistance programs.

One thing I should mention is that the Continuum of Care programs, the fair housing laws apply to Continuum of Care programs. So, recipient of the funds is not allowed to limit or exclude based on protective classes. However, I should mention that there is legislation that has been proposed in Congress, specifically in the Senate appropriations bill for HUD, there was a change proposed that would allow tribes to carry out, act their project, either on or off reservation or trust lands, but they could prioritize tribal members for assistance. So that has not been enacted yet so, we'll have to wait and see but, if that law passes then, obviously that changes how tribes and [inaudible 00:33:00] designated housing entities can target people.

Another sort of unique feature of the Continuum of Care program is that the projects funded by the Continuum of Care have to take referrals from the Coordinated Entry System. So, unlike other programs where the organization that runs the program really gets to decide who gets served and how they get served, the Continuum of Care program is much more collaborative and, the whole community decides on how the Coordinated Entry System is going to operate and who's going to be prioritized, for different kinds of assistance and the projects that are receiving Continuum of Care funding have to follow those standards. So with that, I think I'm turning it over to Caroline Krause, and she's going to talk about the Youth Homelessness Demonstration Program, which is another program we're very excited about. So Caroline, over to you.

Caroline Krause:

Thanks Norm, next slide please. So as Norm mentioned, I'm going to discuss the Youth Homelessness Demonstration Program, which we always abbreviate to YHDP because it's a mouthful. So, that's what I'll be using to refer to it from now on. So the YHDP is a demonstration program, that was created in the FY 2016 appropriations, to look at how a comprehensive approach to serving homeless youth could dramatically reduce youth homelessness. When we say youth, we mean youth, we mean people under the age of 25. Either unaccompanied youth, meaning that they are by themselves or, pregnant or parenting youth, meaning that they are youth who may have children but the head of the household is under 25.

We've awarded a total of five rounds of funding to date. The most recent announcement that we made was in September of 2021, of 143 million dollars to 33 communities. We do have funding coming up, there is funding from the FY 2021 appropriations language for 72 million dollars, to be distributed to up to 25 communities. The communities generally fall within a singular CoC, but it can be part of a CoC, it does not have to be the entire CoC. Next slide please.

So YHDP has two major components that it requires, the first is to create a coordinated community plan that addresses how the community will address youth homelessness. So parts of that plan include doing a needs assessment, so really looking to identify the number of youth experiencing or at risk of homelessness in the community, as well as the needs for those including educational needs, housing needs, and other needs as well.

There needs to be an identification and a partnership across a diverse group of stakeholders, including education, tribes, healthcare, justice, and number of other stakeholders. And then it needs to incorporate core principles around youth homelessness including housing first, positive youth development and trauma informed care. After the community comes together and does the extensive planning process required for the coordinated community plan and that takes about eight months, then communities come together to determine what projects they will apply for, or how they will take their award and divide that up into projects. The project types are similar to the ones that norm has just been discussing, but essentially the group looks at how best they can shape a number of different projects so that they can have a comprehensive approach to the youth homelessness in the area. Next slide please.

So here's a map of all previously funded YHDP sites. You can see that it is across the country including Alaska and Hawaii, and the sites can be very large, such as Alaska Balance of State did receive a grant for the entire Balance of State CoC, as well as just an individual metro area, such as San Francisco or Oakland Alameda county. Next slide please.

So this is going through the overview of the YHDP process. So similar to how the CoC process goes. The first step is that the CoC collaborative applicant has to apply to be designated as a YHDP community. Once those applications come through, that will evaluate those applications and determine, and make an announcement of which communities were selected to be YHDP communities. At that point the total amount of the award is announced so it would be that this community will have this much funding. However, before the community has access to the majority of those funds, they do have to go through the extensive planning process that I discussed a couple slides ago, the coordinated community plan.

After the community has created and submitted their coordinated community plan to HUD, then they're allowed to create projects that are developed through that planning process, and then use those funds to fulfill that project. Next slide please.

So I'm going to turn this over to Jamin Bryan, for the discussion section of some of the things we would like to know more about, in terms of how the YHDP program could be improved to integrate tribes.

Jamin Bryan:

Thank you. Thank you Norm, Robert, Caroline, for the great presentation this far. It's been a lot of information shared so far, but focusing on the YHDP, which

is a new, we've not presented that before. We really want to delve into a few sort of topical questions, and as you either come off mute and provide your comments, or if you put it in the chat, please identify yourself by providing your name, your title, and the tribe that you represent. Next slide.

Okay. So we invite you to really consider some of the questions here, or again we don't have to restrict [inaudible 00:39:49] your comments to, what we have here. But these particular areas that we're interested in hearing about from you. So I'll just read off some of the questions, I'll read off straight what the questions are, but then open it up for any, comments or feedback you'd like to give.

So we wanted to get some information on what organizations are focusing on youth homelessness in tribal areas now, really interested in hearing what partners are critical, what do you think? Who do you think are critical partners to effectively address youth homelessness in tribal areas? So in non-tribal areas as well. And as you heard Caroline mention a critical component of a YHDP is the Youth Action Board. It ensures that the youth with lived experience lead the work. Our question to you is how can HUD facilitate the membership of Indigenous youth on the Youth Action Board? So again, those are a couple of the questions that we have, but we open it up for any input that you'd like to provide us. I think we're also monitoring the chat for any questions that we'll get that route. Team I'm going to need you guys help in reading off any questions that you see in the chat.

Norm Suchar:

So Jamin we do have a question about; I think this came before the YHDP section but about how you determine people's needs if they are experiencing homelessness and have no technology available to them. So, that's definitely something with great feedback and, something a lot of our communities deal with and something we have developed some technical assistance around and probably need to develop some more recommendations and technical assistance around. We also had a question, again not quite on the youth side but, a question about whether multiple Tribes could form a CoC together, and whether it would have to be contiguous and whether it would all have to be in one state.

So we'd love to hear more comments about sort of the configuration that makes the most sense for a CoC. Currently you could do CoC with multiple Tribes and it does not all have to be located in one state, and it does not have to be contiguous although, has to be sort of somewhat close together. So, there is a lot of flexibility there but would love to hear some more suggestions there. Also it looks like we have a verbal comment, and so maybe we can take that here.

Speaker 1:

Sure.

Cheryl Andrews-...:

Hey there, [crosstalk 00:43:02] happy new year to everybody. This is chairwoman [inaudible 00:43:07], and it's a nice bombing 16 degrees up here in Massachusetts. Anyway, this subject matter couldn't be more important

especially considering the climate and the temperatures and everything else that are going through. I did want to ask one question with regard to, I know that we are looking to have the legislation change to be able to, have Tribes exempted from certain requirements so that we can focus in on our tribal communities. And I was wondering if there was any latitude afforded the secretary for interim final rules or anything else that might be able to afford some sort of temporal relief to tribe so that we can focus in on our tribal communities, was my question.

But also with regard to the questions that you have, the comment that was made about, a lot of times the people that are homeless or in most need, do not have any access to any sort of communication, internet or anything else. So sometimes it's hard to reach out to them and or to get that feedback. However, oftentimes the tribal administrations or the Tribes have youth programs, and I think by reaching out to each of the Tribes through our youth programs we can get that sense. However, my concern and my fear is that we still don't get to those most in need because of their instability in a place for them to call home and therefore, are probably out of range to be able to have good connectivity with the tribe tribal administration so, we're basically multiple degrees out up by trying to communicate with these young people through family members that might be able to have more communication.

So I don't know whether or not it would make sense to have outside of tribal shelters or other, I guess delivery systems have maybe as part of the intake, whether or not these people that are asking for shelter are members of federal recognized Tribes, similar to how we have with the Iqua and how we have to ask that question up front.

That might be one way of being able to cast that net very broadly, that we may be able to reach some people that are parts of our communities that have just been beyond our reach. But again, this is a wonderful program that looks like it could have great potential, but most of us are at least in this day and age, we are also very limited with our staffing. So for us to have to have it that wide or that broad of acceptance, puts a lot of us small Tribes out of competition on it. And we'd really much prefer to see carve outs that the Tribes are not competitive with other municipalities or other nonprofits, as well as trying to get away from competitive grants altogether, because it doesn't work for Indian country. But thank you for the work you're doing, and y'all stay warm and keep up the great work.

Jamin Bryan:

Thank you. And thank you so much for that feedback, and those areas that we really need to focus on, try to help address. And you too stay warm. Do we have any other speakers, anyone else that would like to speak? And I did not see any additional questions come in or did we? Oh yes, we did.

Speaker 1:

You'd like, I can give off the instructions for how to leave a verbal comment. [inaudible 00:47:00] So, as we move to the comment portion of today's call, you may enter the comment queue by using the WebEx raise hand icon, that's

located just above the chat. You will hear a beep tone when you are unmuted, at that time you can state your name and comment. We currently have no verbal comments, oh, we do have one coming in here. Let me go ahead and unmute that individual.

Jody Perez:

Hello. My name is Jodi Perez, I'm the executive director for Salish and Kootenai Housing Authority, in the Flathead Indian reservation in Montana. I'm home with COVID right now so, I'm sorry if you can't hear me very well, I'll try to enunciate. But, for our reservation, we do not have a homeless shelter, the Housing Authority has a transitional living center with 19 units, and it's always full, and it's only for our Tribal members. We are looking into having a warming center, specifically for our tribal members. And we had looked into having a homeless shelter on our reservation, and we were advised from the Poverello Center in Missoula that if we opened it, it needed to be for tribal members only, or people would start shipping their homeless to us and we would be worse off than we started. And so we heeded their advice and put it on pause but the need is still there.

And it's just compounding with the current weather and with COVID and so, we need to do something. There are small organizations and churches that are creating shelters, but they're specifically for their reasons. And so like Narcotics Anonymous for people in recovery and the churches, there's I think two churches that have a couple rooms that are being used for homeless shelters, and there's a domestic violence shelter, that's all we have on the reservation.

And so, this Continuum of Care funding, when we heard that it was going to be available we were really excited about it. But then we heard we had to partner with a CoC, and the whole state of Montana, this is my understanding, and I had never even heard about this funding before. But my understanding is the Montana Homeless Coalition, is in charge of the CoC that's the only one for the entire state of Montana. And we would have to partner with them and so, just figuring out the system is a...

Jody Perez:

So just figuring out the system is a huge, maybe, speed bump in moving forward. I want to help our tribe create a homeless shelter for our tribal members, and I think the long-term operations is probably the largest hurdle. So if CoC could help, that would make a big difference on our reservation. As far as for the youth homeless problem, the schools are starting to try to figure out ways to deal with the homeless in our area. I know one school has allowed students to stay in one of their rooms overnight if it was necessary, and so maybe we could collaborate with the schools to have a more accurate count.

We will be doing a homeless survey soon. We're doing a housing needs assessment first, and then we'll be doing the homeless survey, and then we'll have a better idea of what our problem is. We know it's here, but we don't know how big it is. OPI did do a self-reported homeless student count, but their definition does not align with HUD's. That's one of the problems too, is that all of the definitions are different for every organization. So, maybe some

consistency would be helpful. But anyway, if there was a way to have money that the tribes could access, that we know how to access, and that would support our programs, that would be the most useful for us. Thank you very much for all of your efforts, and for taking the time to ask the tribes what we need, and to work with us.

Jamin Bryan: Thank you so much for the valuable feedback and information, and really wish you a speedy recovery. We heard you quite clear, so no worries there. Thank you so much. Any other speaker comments?

Norm Suchar: Jemine, we had one more question, and I'm actually going to direct this to Caroline. It was a question about, for the Youth Homelessness Demonstration Program, whether tribes would be required to use a screening tool that the YHDP program developed. So I wonder, Caroline, if you could just address that really quickly.

Caroline Crouse: Sure. So, the YHDP doesn't have a specific screening tool it uses. So the purpose of YHDP is to facilitate youth-specific strategies that meet the needs in the community, and to that end, that's what the planning process is for that eight-month-long planning process. Where I should say you'll have communities get significant technical assistance to support making sure that they can identify the needs and how to meet those needs through the YHDP. So communities with YHDP projects will need to accept referrals from a coordinated entry system, and part of that is a standardized assessment tool, but HUD it doesn't mandate what the specific tool is. So it certainly can be one that, if it needs to be changed or if you need to build one that's specific to your community, that is definitely allowable.

Jamin Bryan: I just want to emphasize that the YHDP, it's a demonstration program, and it's really intended to provide communities with the flexibility to really meet its specific needs. Right? Even in the face of certain regulatory requirements, if there's an opportunity to do something differently because there's a true benefit that would be realized by that community, the YHDP program does allow for that kind of flexibility. So I think as you become more aware of what is authorized and what you can do under that program, I think it would be very, very, very attractive and will really help meet some of the needs that you have in your community. It's a very exciting program for me personally. It really has been quite effective for those first few rounds that have had it for a few years. So, strong encouragement.

So we do have a bit more to go in the presentation, and really excited to also present another potential funding opportunity that would be available to CLCs, and then of course the tribal partners as well. So I do want us to get to that, and we'll have a couple of more opportunities for additional feedback and input. So, let me turn over to ... And who am I going? To Brett. Brett Esders. Hi, Brett.

Brett Esders: Hi. Thanks, Jemine. We want to go to the next slide. So as Jemine mentioned, we have some potential new funding opportunities coming up, and they're

based on what we've been hearing from communities, not including tribes up to this point, and what we're seeing in the data. And they're related and unrelated, but unsheltered homelessness is continuing to rise in many areas of the country, and we're seeing that people who are experiencing unsheltered homelessness are experiencing greater health challenges than their shelter peers. A lot of them are suffering from physical, mental health, and substance abuse issues, and their outcomes are much worse when you compare them to their sheltered peers. And then also we are seeing that in rural areas, homelessness doesn't always look the same as it does in urban areas and in suburban areas. And there's a need for unique strategies to resolve homelessness for highly vulnerable populations that are experiencing different characteristics or in different living situations than they might be in urban areas. So, we're thinking about potential funding opportunities to address these two situations. If you want to go to the next slide, please.

Related to that, any funding that we would be able to provide for these types of projects or opportunities would currently go under or the CoC program, so it would follow all CoC program requirements. As we discussed the beginning of the webinar, that would be including going through the CoC. It will be competitive, because that's how the CoC program runs. And it would allow the same types of projects that Norm discussed earlier, and follow the same type of process that Robert went through earlier, and tribes would be eligible to apply under the new rules for the CoC program. Next slide, please.

Great. So there's not a lot out there, because we haven't done a particular funding opportunity yet related to this. It's something that we're thinking about. There is not a lot of background information to give you all, but there are a lot of questions that we have for you. I think I'm going to turn it back to you, Jemine, to walk us through the questions and talk about what will be useful for tribes and their partners in solving unsheltered homelessness and also rural homelessness.

Jamin Bryan:

Thank you, Brett. Thank you so much. Yes. Again, I would like to invite you to provide feedback regarding this funding opportunity that Brett spoke to, to address unsheltered homelessness and rural homelessness. Please remember, share your name, title, and the tribe you represent when providing your comments. So again, some of the topics that we invite you to speak to, or anything more than this as well.

So when considering the creation of potential funding opportunities, we're really interested in what resources are needed to reduce homelessness in tribal areas. What are some interventions that are most effective in reducing homelessness amongst those experiencing unsheltered homelessness in tribal areas? For those who are not unsheltered but remain highly vulnerable, again, what are some interventions? Is there anything HUD could include in a NOFO that would be helpful, of course, or not helpful for tribes in addressing homelessness in tribal areas? For example, limiting or expanding eligibility requirements, allowing certain types of interventions to be funded. Again,

would like to just open up the floor for any thoughts, feedback, and input you could provide in this or other areas. I saw in the chat that Justin Krupa had his hand up, and we didn't get a chance. So Justin, I invite you to also speak at this point too.

Event Producer: Okay. We have a couple of folks in the chat. Again, Justin, if you'd like, please feel free to raise your hand now as well. We'll go to the first person we have here. I'll go ahead and go to Justin.

Justin Krupa: Hi. I'm Justin Krupa from the Samish Indian Nation in Skagit County, Washington, and a few things that I've seen. Well, I originally had chimed in about the YHDP program and the screening tool because there's been a screening tool that was adopted in Washington state that caused a little bit of upheaval. Not that it was good, bad, or indifferent, but just being able to utilize that tool in a manner that's going to be effective has created a little bit of drama here and there outside of Indian Nation. And inside our programs, we're trying to really reach out to find how we can better serve the youth community of 13 through 24. My background is in youth services or running youth shelters, but outside of our Nation.

So what we're trying to do is find some of these tools that can work, and one thing that is probably going across all spectrums of everybody on here and across the Nation is that the ability to utilize dollars effectively to create and sustain affordable housing is the greatest impact that we're trying to address. In our service footprint, we cover 10 counties. And we don't have a res, so we're trying to cover as much using scattered-site housing that we can with both TBRA dollars and HUD dollar ... Or I mean, and Rapid Re-Housing dollars, and tApp was there. But still, we can't ever catch up. And no program out here that I know of, tribal or not, can really catch up to the escalating cost of housing.

So, we're really trying to look at how we can work with our CoC in order to create more housing. We have a 0% vacancy rate in our county. There's a 0% vacancy rate in the county above us. And the cost of housing is so astronomical that even if we can find somebody and they have income, the difference in that TBRA dollar is so much that it whittles away our ability to effectively serve more people. Right? Because the payment that's going out is so extremely high. So I think one of the greatest things that we can address is, at least in our area, is the creation of and the ability to think differently of what housing looks like, and how we can create housing that will be culturally reflective and be able to include the traditions that are being lost. Include the learning models, the pedagogy that we've used for our youth building up, and how to implement that in a safe environment.

Really, without creating more housing, from our stance in this part of the country, it's kind of a zero-sum game because there's never enough housing and there's never enough affordable housing. So a way for us to address some of these issues is to think differently, and try to work with our CoC to ... If we want to reduce homelessness in tribal areas, we need more housing. I know it seems

really too easy, if you will. Not that the actual application's easy, but just the statement in and of itself, but that's the truth of the matter. There's no place, and that's what we're running into over and over and over. We have elders that are getting priced out of their apartments when the rents are jumping \$400. This is all day long, and creating programs where youth are not falling into chronic homelessness.

That's one of the transitional points that we're trying to address, is how could maybe we utilize YHDP or these other programs that are coming down the pike to create housing that's safe and has programming built into it? Because I think, to go back a few steps to some of the things that were brought up earlier on, it's one thing to find housing with somebody for someone. But if the services around the person are not there and easily accessible, then the propensity to enter into recidivism of homelessness is exponential. Right? We need to be able to create these centers, and using the term center loosely, but the idea of this wraparound care that I know is kind of a hot topic for so long, and then it faded away into whatever new euphemism is for all that.

But the reality is such that to have the flexibility with these dollars to create housing, is really what we need to do for our youth and for everyone up ... We're trying to cover as many people as we can and help as many people as we can, and the housing is just ... The way the system is designed up until this point is detrimental to the people we're trying to serve, because it's this illusion of hope a lot of the time. This hope that we're going to get somewhere, when there's actually nowhere to be. We have a wait list for TBRA that, as to my knowledge, this is one of the first times we've had it. And for some people, that wait list, it's starting to feel very Section 8-ish, where it's going to be a long, long time before we're going to be able to serve you.

So one of the ways to address this and what we're working on right now is to try to reach out to not only our CoC, but all the different programs, youth-serving programs, elder-serving programs, housing programs, vocational development programs, and really try to make sure that up and down our corridor here of 10 counties, that if someone comes to the Samish Indian Nation from any federally-recognized tribe, we have something to say. So when they leave there, even if we don't have housing, they have a lead on the next endeavor. You have a person to call, a phone number to have, an email to do. So, there's something that's tangible.

Truth be told, a lot of those times it just doesn't shake out, and the person we're referring them or the agency is full as well. But at least having something and having some sort of connection. I think that's one of those resources that we all need to do, is just to really try to focus our attention on knowing what the next agency does, knowing what the next tribal community is doing, knowing what the next ... So as you branch out, you start to make these holistic relationships. So it makes the process for the people we're trying to serve maybe just a smidge easier, but when you add it all up, a couple of smidge-easiers is a whole lot better making it a smidge harder. And that was-

Norm Suchar: Okay. Thank you so much.

Justin Krupa: Yeah, that's what I have. Thank you.

Norm Suchar: So sorry. [crosstalk 01:08:02] Thank you so much. Great comments. Do we have other people queued up for questions?

Event Producer: We do. We can move to the next.

Norm Suchar: Great. Thank you.

Cheryl Andrews-...: Chairwoman Cheryl Andrews-Maltais, Wampanoag Tribe of Gay Head Aquinnah. I just, I guess, want to echo the sentiment of the previous speaker. I guess what we're looking at is really embracing the concept of the Executive Order 13175 when it comes to Section 3 and policymaking criteria, and really embracing the concept of self-governance, and allowing tribes the ability to determine what is best and how best to design their programs.

Where I'm at, on an island, most of the general programs do not fit our criteria. As a previous caller said, our people are being priced right out of our neighborhood, right out of our homelands, because we're at a vacation, high-end resort destination now. And to be able to have of the funding coming in that's sustainable, so that if we cannot complete projects in one particular year because it's simply not enough funding, and we know there isn't enough funding to really adequately meet the needs of Indian country. But by being able to have the funding come through more or less on a self-governance model, that once it's allocated to the tribes, the tribes can start to plan. Because in that way, it creates sustainable funding. And then if it takes us two, three, five years to collect enough money to be able to build what we need to be able to build, we have that ability to do it. And that creates the sustainability for the maintenance.

Part of our challenges now is that all of these things that are ongoing support systems and mechanisms that tribes are performing on behalf of the United States, they don't go away one year after the next. So therefore, it's hard to even get a foothold and continue with anything that's going to be manageable or meaningful if it's always drips and drabs. And then if you have to report on it, or if you have to sit there and expend it in a specific spending window, which most of these grant-driven funding mechanisms are, it's counterproductive for us. Again, not only the sustainability and the flexibility, but when the average cost of a house or a home where you live is a million dollars, good luck with that. So we have to be able to become very, very creative and very, very resourceful.

The other aspect is looking at it from what we do. As tribes, we are not siloed into one department or the other. We provide wraparound services in every aspect that the United States offers to all of their citizens in the individual silos that they have. But we have to do it all, and we have to look at these things as a

wraparound service without those firewalls, all those silos, for us to be able to really do a better job. Because one thing does link to the other, and we look at things in a cyclical relationship. Part of the problem with our children's education is if they don't have stability in their household or a stable home, if they don't have access to one thing, if there's a problem with employment and money's short. It all just continues to circle around the success of the families.

So if we can really look at things or try to create programs, or at least have the agency embrace the concept of self-governance, and to really follow and look at the policymaking criteria under Section 3 of the executive order, that would seriously help alleviate a lot of the issues and challenges, and help the tribes get a better foothold in being able to deal with what we need to with regard to housing in this day and age away from the antiquated reservation model. Thank you.

Jamin Bryan: Thank you, Chairwoman. We have one more hand up, Moriah McGill. Is that right?

Moriah McGill: Hi. Good afternoon. My name is Moriah McGill, and I work with Northern Circle Indian Housing Authority. We are a tribally-designated housing entity that works on behalf of seven federally-recognized tribes here in Northern California. My comment, question today is around tribal involvement with the CoC. So many of the speakers today had mentioned a lot of the funding, you have to be connected with the local jurisdiction CoC. One thing that we're finding in Northern California and the two counties that we serve, there's not a lot of communication back and forth, and it is so new for the local CoC to work with tribes and vice versa. Even utilizing the HMIS system locally here in Mendocino County, when completing that data, inserting that data, there's a dropdown box for Native American, but that's it. It stops there.

One of the things that we had discussed with our local CoC is, how do we incorporate the 109 federally-recognized tribes in California and provide a subcategory so that those individuals can be directed and referred to the tribe themselves? Because Madame Chairperson just mentioned that we as tribes offer these full-body services. We provide housing, food, childcare. So rather than it stopping at the county level, how can we empower the CoC to reach out directly to the tribes themselves?

Here's the solution. The tribes need to come together and create their own CoC. I would love to see us break away from the local jurisdiction, because it's too much catching up. There's too much gap. There's not enough time to really, really get to that point and ensure that tribal members are actually receiving fair and equitable services. So, I think this call is making it very apparent that tribes are ready. We're ready to take on these actions of CoCs ourselves. One of the things that we're proposing in California is, we split us up in three sections. Three regions here in California. Let's do a Southern, a Central, and a Northern. Let's create our own CoC, expend our own dollars, gather our own data, and do so on behalf of the tribes. So, if there's any way that we can-

Moriah McGill: ... and do so on behalf of the tribes. So if there's any way that we can get help in seeing this through in California, in Massachusetts and Nevada, all throughout the nation, any assistance that we can get would be excellent. Thank you.

Jamin Bryan: Thank you for that really valuable input. Really appreciate it and I think I want to move us on to the next section of a presentation, because it really is on some ideas on partnering and some steps to get prepared. So with that, let me turn it over to Norm.

Norm Suchar: Thank you so much. I apologize if my video isn't working here, but in HUD building our bandwidth is a little sketchy, so I want to talk about developing partnerships so we'll go to the next slide here about Developing Partnerships and I specifically want to talk about partnering with a neighboring CoC. So one thing, and we'll try to put this in the chat window so you can have an active link to this, but it sounds like many of you have been working with your CoCs so you're familiar with who those CoCs are. If you haven't had a chance to contact your CoC and you want some contact information, we do have a link there to contact your local Continuum of Care.

So we've done some analysis of the sort of general overlap between Tribes and Tribal Organizations and CoCs, as you can see from that second bullet there, there are about, well there are 691 Tribes and Tribal Organizations that have a portion of their area that may overlap with about 132 Continuums of Care and we did create a map showing some of those overlapping areas and again, we want to communicate with CoCs and with Tribes to let them know who they should be working with to try and develop a strong partnership going forward. So moving on to the next slide please.

So I want to talk specifically about the 2022 Continuum of Care NOFO. Obviously the work of partnership building is a long term project and it's a big project and it's going to require a lot of work over a lot of time, but we did want to talk about the very next steps in the Continuum of Care process so one step is to figure out who, which CoCs should you reach out to if you are ready and want to reach out to a CoC, identifying which ones are adjacent to your Tribal geographic area, that's one great way. Maybe if you have multiple CoCs, which ones are easier to partner with, maybe the ones that have more funding available and are there already Tribal communities, housing organizations, service organizations that have relationships with the Continuum of Care in their area. We know of a lot of Tribes and Tribal Organizations that run CoC programs, run CoC projects that just do amazing outstanding work so we know that there are a lot of great examples out there.

So trying to find out from the CoC what is the local process for identifying and assessing project? Where are they in their process? I think one of the... Earlier, when I was talking about the funding process and you know what is that local competitive process, learning about that and how you can participate that is really important to engage in this next round of CoC funding. There's a question here, are they accepting new applications? Really every CoC should be accepting

new applications, it's just a matter of timing and it's also helpful to know, Robert talked a little bit about reallocation, it's helpful to know if the CoC is planning to reallocate funds this year, and what kinds of new project opportunities are going to be available.

A few other things to discuss on this next slide here, just wait for this to transition over, thank you. Does the CoC have funding for HMIS, for software and licenses that Tribal organizations can participate in HMIS. What is their training process to train new staff on using that data system? Again, CoCs that are working well should be able to do both of these things to provide funding for licenses and also to be able to do training. How would the CoC be able to expand its coordinated entry system to include people from the Tribal community, and how is the CoC ready to partner with Tribe to adjust the coordinated entry process?

I think we had a couple great comments earlier suggesting different ways that a community would have to really sort of change their coordinated entry process to make it work well. Couple other things I wanted to mention, we obviously put up slides here about ways that you can engage with Continuums of Care. We are also working with Continuums of Care to have them reach out to the Tribes and Tribal organizations in their community so hopefully you have heard or will be hearing from your CoC and hopefully they're reaching out to engage with you and to bring you into this partnership. We are strongly encouraging them to do that and we'll keep ramping up the pressure to be able to do that. So with that, I think I'm going to turn things back to Jemine and she's going to walk us through a little more of our discussion questions.

Jamin Bryan:

Thank you. Thank you so much Norm. We've concluded our presentation of the formal content, but again, we still encourage you to provide us with feedback and recommendations concerning the topics today and why don't we go to the next slide? I'm sort of recapped on some of what we've presented today, but also want to open it up for any feedback you can provide on these particular questions we have here.

The first one, I want to isolate that question a bit and ask if there were any Tribes that participated in the 2021 CoC program competition? I really invite you to give us a little bit of feedback on what was your experience. I'll just give a few seconds if anybody who actually applied for the 21 competition would like to share your experience.

Okay. I'm hearing (silence) Event Producer, did you open any lines?

Event Producer:

We do have Mariah in the queue again, I'm not sure if it pertains to that discussion point. Did you want me to go ahead and open the line?

Jamin Bryan:

Yes.

Moriah McGill: Hi, thank you so much. So we did not apply in the 2021 funding but I kind of go back for a moment and comment on what Norm was saying in regards to encouraging Tribes to engage with the local CoC and how HUD is encouraging the CoC to reach out to the local Tribes. So my question for you all is why do we have to participate with the local jurisdiction's CoC? Why can't Tribes create their own? Thank you.

Jamin Bryan: Wait, I'll just say this much and then really refer you, invite Norm for any comments he has, but again 2021 was the first year that authorized the CoC program to be made available to the Tribes in TDHs. And it was a huge learning experience. I mean it is a massive program that is a lot of learning and I think [inaudible 01:23:56] you even talked about just the amounts of different requirements and the learning experience that Tribes would have to undergo.

But I think as this program continues, we are now entering into year two, the opportunities for Tribes to form their own CoCs, it is not prohibited, right? Not at all. It is really about having the information, the structure in place, the tools in place to really form your own CoC and to operate it and what I want to really clear [inaudible 01:24:38] is HUD shares your interest in doing that and HUD is committed to providing the resource to ensure that that can be a successful forming of a CoC by our Tribal partners so we are not against it, we support it and we stand ready to help. So Norm, did you want to add anything on that particular point?

Norm Suchar: I think you said that very well. Thank you.

Jamin Bryan: Okay. So let me move on today. A few other discussion questions. We have a little bit of time that again, I want to really open it up for any other feedback and input that you can provide so just to quickly get through these, our questions, what are Tribe's greatest technical assistance needs currently? What are your recommendations about what HUD can do to better facilitate partnerships between Tribes and existing CoCs? And again, we welcome any additional comments or recommendations relating to the upcoming 22 registration and competition, our exciting Youth Homelessness Demonstration Programs, and the funding opportunity that we may see to target unsheltered homelessness and rural homelessness. So again, I want to open it up for questions in the chat or verbal comments.

Event Producer: Just as a reminder, you can use the raise hand icon located above the chat if you have a verbal comment. If you wish to leave your comment in the chat, please do so, just make sure to send to all panelists.

Norm Suchar: We have a written comment from Mariah about, I think, following up on Mariah's other comments saying that there are multiple Tribes in California that are extremely interested in forming their own CoC. How can we work together to create a pilot CoC? So great comment. I don't think we can, we necessarily just need to create a pilot CoC, I think we just create a CoC of working together so if you're interested in technical assistance about creating a CoC and to work

with us on that, we'd be delighted to do that. You can honestly reach out to any of us here in the SNAPs office.

We also have a portal on the HUD exchange. We'll try to put that website in the chat window, but we have a portal on the HUD exchange where you can request technical assistance on topics like this, or any other topic around the Continuum of Care program but you can also just reach out to HUD and through any sort of channel if you get the information to us, we're eager to work with you.

Jamin Bryan: Thank you.

Norm Suchar: We have a question about the written comment deadline.

Jamin Bryan: Okay. So-

Norm Suchar: I don't believe there's... Yeah, go ahead, Jemine.

Jamin Bryan: Yeah. So we, at any time, I really appreciate any comments on Tribal participation in the CoC program, we'll take those on an ongoing basis, but we are asking at least for the topics that we presented today, most, especially YHDP and any unsheltered homelessness, rural homelessness funding opportunities. We really encourage you to submit those comments in the next 30 days to really ensure that we have time to review your recommendations and to really try to incorporate them into any of the potential NOFOs, so again, we encourage it in the next 30 days, but we'll accept comments on [inaudible 01:29:01] basis as well.

Norm Suchar: So we have another comment from Brian McCoy saying our Reservation Leech Lake band of Ojibwe in Minnesota overlaps three separate CoCs, it just seems it would be more efficient for the band to operate their own CoC instead of interacting with three separate agencies. Great comment. I do want to sort of talk about the sort of trade offs between operating your own CoC and working with an existing CoC and to talk about what some of the options are, because I don't want to imply that it's sort of an all or nothing proposition where you are either completely following a CoC's sort of policies and procedures, or you're going completely on your own.

We have really been working on developing materials on working on program models where a community, a CoC can both have a lot of autonomy for the communities within the CoC's geographic area, but also allow the Continuum of Care and the collaborative applicants to take care of a lot of the administrative responsibilities that are often a big burden for smaller communities. For example, operating the Homeless Management Information System, which is definitely a huge challenge and can often be very, very expensive and difficult to implement.

So we definitely encourage partnerships as an option, and we would be delighted to work with Tribes and Continuums of Care to find solutions where there is both the autonomy that the Tribes need to run homeless assistance well, but also relieve some of the burden that comes with operating a Continuum of Care so we definitely want to offer that as an option. I will say that Continuum of Care geography can also change over time. If you find that you are currently in a Continuum of Care or want to be in a Continuum of Care for a period of time, and then at a later time separate and create a separate Continuum of Care, that is an option as is if you are operating a separate Continuum of Care and you would like to merge with a neighboring Continuum of Care, that is an option as well.

So there are a lot of different options and structures that we can work with you on. And we would love to hear about what kinds of partnerships like that would be optimal from your perspective and what would work for your Tribes. The more information you can give us about that, the more it helps us really design assistance and program rules that work going forward. So thank you Jemine for letting me throw that in there.

Jamin Bryan: Thank you Norm. I think we have two more hands up.

Norm Suchar: We'll go to the first.

Moriah McGill: Thank you so much so to touch on how we can empower the existing CoCs to engage with Tribes, I think it would be important to look at the CoC's jurisdiction and what, how many Tribes are within that jurisdiction and perhaps offer an equitable number of seats on their board. One of the things that we're having a hard time with right now is fighting for one Tribal seat here in Mendocino County so I think perhaps if there's five Tribes in a CoC's jurisdiction, why not offer at least two seats to ensure that they're offering equitable outreach to Tribes themselves?

Another thing I think would be important for the local CoCs to really start engaging in is meaningful consultation so having something written out that has a structure of, if A then B, right? If you can't get any contact at B, who do you contact now? Having a procedure for consultation to Tribes or outreach to Tribes. Oftentimes in our area, a box gets checked, we sent one email to the Tribal administrator. There was no response. We did our due diligence. I think it's important that we beef up due diligence and ensure that they are really reaching out to Tribes themselves and yeah. Sorry.

Jamin Bryan: No, thank you. Thank you. Very good feedback. [inaudible 01:34:23] your hand is up.

Speaker 2: Yes. Norm's comment was very interesting about how to work with the CoCs and I was just wondering whether or not there's any sort of legislative prohibition for Tribes to be able to contract those CoCs? It creates a whole

different type of relationship and the CoCs would be able to, or the Tribes would be able to pick and choose almost all the [inaudible 01:34:48] what it is that they need of the CoCs to administer on their behalf. Small Tribes like Mayon don't necessarily have that kind of broadband. I shouldn't say use broadband, that kind of broad human resources or capabilities, but if it's something that the Tribes would be able to contract with the CoCs that might alleviate the need to have to work underneath and basically undermine our Tribal sovereignty, also allows the Tribes to design what it is that they need to design, how it is that they need to design it and also alleviates the need to have to figure out how many seats on a board and/or that consultation.

Like I said, it's a different type of relationship and it allows and supports and reinforces the Tribe's sovereignty and the Tribe's ability and responsibility to create a program design around what that individual Tribe's needs are. It's just a thought.

Norm Suchar: So that's a great comment. Yes. Thank you Jemine. That's a great comment. And I think that's a great idea. Contracting is allowed for most of the functions of the CoC, it's not everything that you're allowed to contract out, but a lot of the things that you were talking about you would be able to contract out. That's a great comment and I think one of the things we should probably think about is developing some examples of how you would be able to do that. So thank you so much.

Jamin Bryan: Thank you and thank you, Chairwoman. I'm not seeing any more hands raised, but I'm not necessarily looking at the chat. Event host, do you see any other verbal comments?

Event Producer: It doesn't look like we have any more verbal comments at this time.

Jamin Bryan: And team. I'm hard for me to monitor the chat, any questions that, or comments we were not able to address?

Norm Suchar: It looks like we've been able to get most of the questions, although we've had a couple that have come in very, very recently so let me take a quick look at those. We have had in the chat some comments from someone who works for the administration on children and families at HHS, one of our great partners on youth homelessness with some resources. I think Mariah was following up with some additional examples of steps that CoCs could take regarding meaningful consultation including Tribal seats, meaningful consultation and outreach, cultural competency, and sensitivity training. And HMIS dropped down to include federally recognized Tribes. Great suggestions.

Jamin Bryan: Thank you. Well, thank you. Before concluding today's consultation again, I'd like you to submit comments within the next 30 days regarding the topics we covered today. Can we go to the next slide? It'll show the email. So the email address is identified on this slide, and again, strongly encourage in the next 30

days, but want to also emphasize that we'll continue accepting any general comments about Tribal participation in the CoC Program on an ongoing basis.

You can also access information on prior NOFAs on the HUD exchange at the website identified here, but also that is a incredible resource of all information about the CoC Program, about the YHD program, some of the data or findings that we're seeing in the unsheltered area that Brett talked about. There's some information available on the HUD exchange as well. So really invites you to spend a little bit of time of seeing what's there to help inform your plans.

And most importantly, I want to really express my appreciation for this opportunity to engage in government to government consultation, your time today, the valuable feedback that you provided again is very, very important to us. So thank you for that. You are valued partners and we look forward to our continuing work together and at this point I will close out this session with, again, a huge thank you everyone. Have a great day. Bye-bye.

Event Producer: That concludes our conference. Thank you for using event services. You may now disconnect.