



Tribal Consultation: Participation in the Continuum of Care Program

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Office of Community Planning and Development (CPD)



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Purpose

- The Consolidated Appropriations Act, 2021 included language allowing the participation of Indian Tribes and Tribally Designated Housing Entities in the Continuum of Care Program.
- HUD is working to implement Tribal participation in the CoC Program in phases from now through the FY 2022 CoC Competition.
 - Requirements for forming a CoC: 24 CFR 578.5
 - Required responsibilities of a CoC: 24 CFR 578.9
- Your feedback and comments will help HUD design procedures for Tribes to participate in the Continuum of Care Program.

Continuum of Care Program - Overview

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

Program Laws/Regulations

- McKinney Vento Homelessness Assistance Act as amended by the Hearth Act
- CoC Program Interim Rule (24 CFR 578)
- Defining “Homeless” Final Rule
- Continuum of Care Competition NOFO

What is a Continuum of Care?

- Approximately 400 in US and its territories
- Geographic size variation (City, County, Balance of State)
- Collection of entities and stakeholders:
 - Homelessness Assistance Providers
 - Local governments
 - Other non-profits
 - Other community organizations

CoC Program Roles

Collaborative Applicant

Eligible applicant designated by CoC to collect/submit required CoC Application info for all projects CoC has selected for funding and apply for CoC Planning funds on behalf of CoC.

Design, operate, and follow a process for development and approval of project applications in response to the NOFO.

Establish funding priorities for the local application process.

HMIS Lead

Eligible applicant designated by CoC to manage CoC's HMIS

CoC

Recipient

An applicant of CoC Program funds that executes a grant agreement with HUD for those CoC Program funds.

CoC Board

Collective of individuals designated to provide oversight and governance on behalf of the CoC. The CoC Board must be representative of the relevant organizations and of projects serving homeless populations and subpopulations within the CoC's geographic area.

Continuum of Care Program – Roles (continued)

Unified Funding Agencies (UFA)

- Collaborative Applicants can apply for UFA designation during the registration process.
- If awarded, UFAs are the only applicant, including for all project applications, for the entire CoC.
- Currently, 11 Collaborative Applicants have UFA designation

Continuum of Care Program – Roles (continued)

High Performing Communities (HPC) Designation

- HPC designation is requested during registration (early January).
- Bar is set high, based on HMIS data showing extremely low number of homeless individuals and families (sheltered and unsheltered) in the CoC's geographic area
- No CoCs have applied for this designation as of yet due to the high standard that must be met.

Continuum of Care Program - Components

Established by the CoC Program regulations:

- Permanent Housing (Permanent Supportive Housing and Rapid Re-housing)
- Transitional Housing
- Supportive Services Only
- Homeless Management Information Systems (HMIS)
- Homelessness Prevention (for High-Performing Communities only)

Established by NOFO:

- Joint Transitional Housing-Permanent Housing: Rapid Re-housing



Program Components and Eligible Costs

Permanent Housing

Permanent
Supportive
Housing

- No time limit for assistance
- Member of household has a disability
- Supportive services must be available
- Leasing or rental assistance

Rapid
Rehousing

- Short (3 months) or medium term (4-24 months)
- Tenant-based rental assistance

Eligible Budget Line Items



Subpart D – Eligible Costs

The CoC regulations establish 12 categories of eligible costs:

| | |
|--|---|
| Leasing (24 CFR 578.49) | Operating Costs (24 CFR 578.55) |
| Rental Assistance (24 CFR 578.51) | HMIS (24 CFR 578.57) |
| Capital Costs*: <ul style="list-style-type: none">• Acquisition (24 CFR 578.43)• Rehabilitation (24 CFR 578.45)• New Construction (24 CFR 578.47) *Capital Costs have a 15-year use requirement | Project Administration (24 CFR 578.59) |
| | CoC Planning Activities (24 CFR 578.39) |
| | UFA Costs (24 CFR 578.41) |
| | Relocation Costs (24 CFR 578.61) |
| | Supportive Services (578.53) |

Eligibility

Recipients

- Non-profit (501(c)3)
- PHAs
- State or unit of general purpose local government
- Now Tribes and TDHEs included

Participants – Must be *homeless* as defined by HEARTH Homeless definition:

- lacks a fixed, regular, and adequate nighttime residence, or
- will imminently lose their primary nighttime residence, or
- unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless, but would qualify under other definitions, or
- fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions.



Youth Homelessness Demonstration Program (YHDP)

Purpose: Funding for communities to develop a plan and operate projects to reduce youth homelessness

Eligibility: Youth aged 24 and under. Inclusive of all youth: pregnant and parenting, LGBTQ, youth under 18, etc.

Past Funding:

- FY 2016 – 10 communities – 4 rural - \$33 million
- FY 2017 – 11 communities – 5 rural - \$43 million
- FY 2018 – 23 communities – 8 rural - \$75 million

Phasing in Tribal Participation

2020

A Tribe or TDHE could assume the role of recipient or Collaborative Applicant (CA) for any existing recipient or CA choosing to relinquish that role

2021

CoCs can write in a geography corresponding to a tribal area or reservation as part of their CoC coverage, enabling Tribes and TDHEs to apply for projects as part of that CoC

2022

Formula establishing the Preliminary Pro Rata Need for each CoC will be recalculated to include tribal areas and reservations.

Discussion Session

Please share your:

- Name
- Title
- Tribe that you represent

Discussion Session

- What recommendations do you have for HUD to facilitate Tribal participation in the upcoming FY 2021 CoC Program Competition process?
- What needs exist within tribal areas for people experiencing homelessness? In what ways can CoC Program funds be used to address homelessness in tribal areas?
- What challenges exist related to addressing homelessness?
- What challenges have you experienced or do you anticipate in partnering with Continuums of Care? Recommendations for ways to overcome these challenges?
- Based on the statutory and regulatory requirements and restrictions, what obstacles are anticipated and recommendations to assist Indian Tribes and Tribally Designated Housing Entities (TDHEs) towards addressing, reducing, and ending homelessness?

Thank you

Please send comments to: CoCTribalConsult@hud.gov

