



## 4.05 Tribes & CoCs: Working Together?

July 26, 2022



# Objectives

1. Summarize Steps for Rollout of Tribal Participation in the CoC Program
2. Review the Changes and Improvements HUD is Working on Implementing
3. Next Steps for HUD, Tribes and TDHEs, and Existing CoCs

# Background

- The Consolidated Appropriations Act, 2021 included language allowing the participation of Indian Tribes and Tribally Designated Housing Entities in the Continuum of Care Program
- Tribes are able to participate by forming their own CoC or joining an existing CoC as a recipient
- HUD is working to implement Tribal participation in the CoC Program in phases from now through future CoC competitions.

# Rollout Steps for Tribal Participation to Date

- Past consultation sessions were held in March 2021, May 2021, and January 2022. Access materials [here](#).
- FY2021 CoC Program Competition: Tribes & TDHEs eligible to apply for CoC funds by partnering with an existing CoC
- Including Indian Tribes and TDHEs in Your CoC Webinar
- FY 2021 YHDP NOFO Webinar for American Indian and Alaska Native Tribes

# Rollout Steps for Tribal Participation to Date

- FY2022 CoC Program Competition
  - Tribes & TDHEs Eligibility:
    - To apply for CoC funds by partnering with an existing CoC
    - To form their own CoC
  - FY 2022 CoC Program Registration Webinar – March 23, 2022 – 2:00 PM EDT
- Direct technical assistance is available for Tribes, Tribal Organizations, TDHEs interested in participating in the CoC Program. Request TA [here](#).

# Looking Forward: Changes & Improvements

- Continue consultation, expanding outreach to a broader audience of Tribal organizations, Tribal members with lived experience, advocates to inform:
  - changes to the process,
  - the ways to overcome current barriers to Tribal participation,
  - the support HUD provides to Tribes interested in participating in the CoC program.
- Develop planning tools Tribes can use to:
  - estimate potential funding available
  - determine level of interest in participating in the CoC Program
  - identify how CoC Program funds could be used to make the biggest impact

# Looking Forward: Changes & Improvements

- Develop more accessible technical assistance products to:
  - Better explain steps in the registration & application processes,
  - Build capacity as CoC recipients,
  - Begin establishing framework to establish an independent CoC
- Review and amend existing language in regulations, notices, and technical assistance products that are culturally insensitive given their historical context or that create barriers to Tribal participation.
- Explore ways that HUD can provide opportunities for Tribes to impact homelessness in tribal areas, such as:
  - CoC formula
  - Incentives
  - Tribal Preferences
  - Honoring Tribal sovereignty and respecting Tribes' autonomy

# Next Steps – FY 2022 Competition

- Consultation Session being scheduled for the Youth Homelessness Demonstration Program (YHDP). Announcement will go out on [www.hud.gov/Codetalk](http://www.hud.gov/Codetalk)
- FY 2022 CoC Competition (plus Unsheltered & Rural NOFO and YHDP)
  - Registration is complete
  - NOFO for the CoC Program Competition hasn't been released yet
  - Unsheltered and Rural NOFO released (\$332 million) – applications due to HUD October 20, 2022. CoCs will conduct local rating and ranking processes.
  - YHDP NOFO released (\$72 million) – Collaborative Applicants required to submit applications for their particular geography (due to HUD 6/28/22); next step is for project applications (due 7/1/2023) to be carried out within selected geographies. Upcoming Tribal consultation being scheduled.



# Next Steps – FY 2023

- Tribes can begin weighing benefits of forming their own CoC against applying for a project through an existing CoC.
- Partnering with an existing CoC
  - SNAPS, HUD Field Offices, and TA are available to help facilitate conversations and outreach between Tribes and CoCs.
  - Recommended planning steps (TA is also available for this):
    - ❑ Assess the desired geographic area that a Tribe or TDHE is interested in covering
    - ❑ Analyze available data and funding to determine which projects Tribe is interested in applying for (Permanent Housing, Transitional Housing) and which populations served
  - Helpful to begin prep work now for a Tribal resolution

# Next Steps – FY 2023

## Forming a new CoC – the longer-term option

- Look closely at 24 CFR 578.7 to become familiar with the CoC responsibilities
- Extremely challenging and time consuming for new CoCs to get underway.
- Smoother process, and the approach to get started sooner is to first partner with an existing CoC.
  - Build up an Annual Renewal Demand (ARD)
  - Gain familiarity and capacity with the structure and process
  - Then make the decision about potentially forming an independent CoC.
- SNAPS is available to work on exploring structures where an CoC does administrative work (and continues taking on the more burdensome requirements) while giving Tribes the autonomy to make their own decisions about governance (also coordinated entry, data collection and data sharing, etc.)

# FY 2023 Budget Proposal

- Would allow Tribes to implement a Tribal preference and limit assistance to American Indians or Tribal members.
- Alternative requirements for the Certification of Consistency with the Consolidated Plan:
  - No certification required if the CoC consists of reservation and tribal land only
  - Tribes or TDHEs applying for projects on reservations or tribal land need a certification of consistency with the local Indian Housing Plan (not the Consolidated Plan, which would otherwise be the requirement)
  - Recipients of awards being carried out on reservations or tribal land can certify they will follow the Indian Housing Plan (not the Consolidated Plan, which would otherwise be the requirement).

# Planning for Technical Assistance Resources

- Tool for Tribes and TDHEs to use to estimate the funding potentially available as either an independent CoC or by partnering with an existing CoC
- HUD strongly encourages the use of direct TA resources
- Communities of Practice to bring Tribes together for peer learning on specific topic areas (e.g., coordinated entry, data collection, other topics of interest as requested)
- Ask A Question on the HUD Exchange