



Including Indian Tribes and TDHEs in Your Continuum of Care

September 28, 2021



Objectives of this Session

This webinar will provide information regarding how CoCs can:

- Identify neighboring Tribes and Tribally Designated Housing Entities (TDHEs)
- Work with their neighboring Tribes and TDHEs to partner and prepare for the FY 2021 CoC Program Competition.
- How Tribes and TDHEs may participate in the CoC Program

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.
- HUD conducted two Tribal Consultation sessions: March 24, 2021 and May 25, 2021. Access materials [here](#).

Recap of Tribal Consultation Sessions

- Issues raised included:
 - TA needs to increase capacity of Tribes and TDHEs
 - Tribes being able to meet needs of Tribal members
 - Making connections with CoCs
 - Meeting certain CoC Program requirements (e.g., match, coordinated entry participation)

Recap of Tribal Consultation Sessions

- During the consultation sessions, HUD provided Tribes information about:
 - CoC Program requirements, responsibilities, and major roles (Collaborative Applicant, Board, Recipients, HMIS Lead)
 - How to identify their local CoC
 - How project applications are submitted to a CoC and a general idea of local CoC processes
 - The project application process and what to expect

Homelessness and Housing Needs in Tribal Lands

- American Indian and Alaska Native (AI/AN) households disproportionately affected by homelessness
 - Comprise 1.3 percent of U.S. population, make up to 10 percent of persons experiencing homelessness in some areas
- Many people in tribal areas live in doubled up or overcrowded situations
 - Point-in-Time counts have very limited coverage of tribal areas at this time, so we have much to learn about the extent of homelessness among the Native American population

Tribal Participation

All CoC Program requirements apply to Tribes and TDHEs choosing to participate in the CoC Program

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

2021 CoC Program Application Timeline

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

- CoC Program Registration has been completed
- [NOFO](#) for project applications was published 8/16/2021
- Competition closes on 11/16/2021 at 8pm ET

FY21 NOFO provides that Tribes or TDHEs are eligible to:

- Apply for CoC Program funds as a project applicant or subrecipient
- If approved by the CoC, may be designated as a Collaborative Applicant

2021 CoC Program NOFO

FY21 NOFO permits a Collaborative Applicant (CA) to add to their formula area in order to apply for a project in a formula area that is not a non-entitlement area, metro city, or urban county.

- Tribal Resolution authorizing CA to claim geography is required;
- Include geography on Form HUD-2991
- Geography must be contiguous to or overlap the CoC's existing geography
- No changes to CoC's PPRN amount
- Change only affects this year's competition.
- Deadline to submit registration amendment is 10/22/2021.
- Submit amendments to: CoCNOFO@hud.gov

2021 CoC Program NOFO

What Does This Mean for Tribes and TDHEs?

- Creating a new CoC for FY 2021 Competition is not possible
- CoCs may have already made local decisions including about reallocation and potential bonus projects
- No additional or set-aside funding available specifically for tribes
- CoCs and Tribes need to connect to understand each others' processes and project priorities

Plans for FY 2022

- HUD plans to publish Preliminary Pro Rata Need (PPRN) amounts for all formula areas and make formula areas (including reservations or trust land) available to be assigned to CoCs during FY22 Registration process
- Tribal resolution required that permits CoC to claim reservation or trust land as part of the CoC's geography.
- Changes are applicable to FY 2022 CoC Competition

Partnering with Neighboring Tribes

- There are **691** Tribes and Tribal Organizations throughout the country where a portion of their area (including off-reservation trust land) may overlap with **132** CoCs
- HUD created a [map](#) showing the overlapping areas
- Information on Tribes—including contact information—can be located on HUD.gov [here](#).
- HUD encourages CoCs to reach out to neighboring Tribes.
- During the consultation sessions with Tribes, HUD advised interested Tribes and TDHEs to reach out to local CoCs to identify opportunities to partner.

Preparing for Tribal Participation

- **Determine which Tribe or TDHE to contact**
 - Which Tribe is adjacent to the CoC's geographic area?
 - Are there any Tribes represented within the CoC's geographic area that do not have associated land (e.g. reservation, trust land, etc.)?
 - Do any Tribal community housing and service organizations have an existing relationship with organizations in the CoC area?

Preparing Tribal Participation

- **Engage and partner with local Tribes or TDHEs**
 - Is the Tribe or TDHE interested in pursuing homeless assistance activities eligible under the CoC Program?
 - Are they interested in submitting a project application?
 - Consider reallocating funds this year to support new projects. If not this year, plan for FY22.
 - Are local application guidelines able to accommodate applicants that are still interested in applying at this point in the process?

Preparing for Tribal Participation

- **Does your rating and ranking process have barriers to Tribal participation? For example:**
 - Scoring on data that Tribes haven't collected to date?
 - Scoring on CoC attendance or participation requirements?
 - Scoring on outcome measures that Tribes haven't tracked to date?

Preparing for Tribal Participation

- **Building capacity and inclusivity:**
 - Providing training for staff on using HMIS and other core functions of the CoC
 - Providing enough HMIS funding for software and licenses for Tribe and TDHE recipients
 - Planning in partnership with Tribes for an expanded coordinated entry system to include potential clients from the Tribal community

Next Steps

- Submit CoC Competition questions to the CoCNOFO@hud.gov
- Tribes and TDHEs can continue to submit comments to:
coctribalconsult@hud.gov

Questions?

