Indian Tribes and TDHEs in CoCs Webinar

0:00:05.9 Cherita Claitt: Hello, and welcome to the webinar. My name is Cherita Claitt, and I'm a TA provider with TDA Consulting. I'll be introducing today's webinar. This session is being recorded and will last 60 minutes to include time to answer questions from the chat box. During this webinar, all participants will be muted by default. If you are having trouble with your audio, or want to ask a question, please do so in the chat box on the right-hand side of your screen. We will answer as many questions as possible during the Q&A portion of the webinar. After the webinar, please submit any outstanding questions to the HUD AAQ. Presentation slides and recordings will be available in the coming weeks. I will now turn the presentation over to Marlisa Grogan, with the SNAPS Office.

0:00:54.7 Marlisa Grogan: Hi, everyone, welcome to the webinar. I'm really happy to be here with you all. And I'm also joined by Latrice Crum, and the Director of the SNAPS Office Norm Suchar, who are helping as Resource Advisors, and overall support for the webinar. We are here today to talk about how CoCs, Continuums of Care, can include Indian tribes, and tribally designated housing entities in their continuum. The objectives for today are to talk through how to identify neighboring tribes, and tribally designated housing entities, TDHEs, how to work with your neighboring tribes, and TDHEs to partner and prepare for the fiscal year 2021 CoC Program competition, and how tribes and TDHEs may participate in the CoC Program. While the primary audience for this webinar is existing Continuums of Care, we're also hopeful that some tribes and TDHEs are tuning in. We are using this opportunity to communicate to CoCs just what stage of the process in rolling out tribal participation we're currently in, so that you're aware of the consultation sessions that have already happened, and just how you can take initial steps to start engaging with your tribal and TDHE partners.

0:02:30.6 MG: To start with, a little bit of background. We have a review of the legislation. To go back even further, just for those of you who don't know, the Native American Housing Assistance and Self-Determination Act of 1996, or NAHASDA, it went into effect to reorganize and simplify the way that HUD awards housing assistance to tribes, so instead of having assistance coming from multiple programs like CDBG, HOME, ESG, all of those sources were consolidated into one single block grant called the "Indian Housing Block Grant." And since that time, tribes have been taken out of recipient status for the Continuum of Care and ESG programs. That was through the HEARTH Act amendments to the McKinney-Vento Act, where tribes were taken out, just literally taken out of the legislation as eligible recipients. Since that time, an effort has been made to basically increase the availability of funding to support homeless assistance activities for tribes, and the Consolidated Appropriations Act of 2021 finally did that. It included the language allowing the participation of Indian tribes, and tribally designated housing entities in the Continuum of Care Program. So at this point, tribes are able to participate by either forming their own CoC, or joining an existing CoC as a recipient.

0:04:12.1 MG: This is a process that's in the work, that HUD is implementing in phases however, so you'll see as we go through the current state of this process that tribes are able to participate as recipients for the fiscal year 2021 competition, and we'll continue to integrate tribal participation through future CoC competitions. And the consultation sessions that I referred to before, they were conducted on March 24th, 2021, and May 25th, 2021. The materials can be accessed in this hyperlink, and I can quickly put that in the chat as well, so that you all have it available. This is where you can see both the presentations and the feedback that HUD received from tribes. We went into a lot of detail about what the Continuum of Care is, and the competition process, and I'll go into

a little bit more detail in a moment about that. Okay. As a result of the consultation sessions, it's really important for continuums to know that some of the issues and concerns raised by tribes included TA needs. We heard loud and clear that tribes have identified TA as a need to increase capacity. As with any new recipient, the CoC Program for many tribes and TDHEs, is a foreign concept. There's a lack of familiarity. And so, TA is definitely needed to be able to increase capacity.

0:06:01.1 MG: Tribes also said that they have a concern about meeting the needs of tribal members, so in being participants in the Continuum of Care Program, how can they ensure that, first and foremost, they're able to meet the needs of their tribal members? Another concern raised was making connections with Continuums of Care, who to reach out to, how to make sure that that outreach is well-received, how to know who is the right person within the Continuum of Care to reach out to, what to do if you... If they reach any obstacles in communication. And I think that a number of CoCs that we've heard from have similar questions, and we will also get to, in this presentation, the questions that CoCs... We know CoCs are asking, and basically, how to take the next step in getting answers and making progress towards establishing partnerships. Tribes also raised a concern about being able to meet certain CoC Program requirements, like match, coordinated entry participation, HMIS data entry requirements. I think a lot of these are really valid concerns, and I'm sure you would agree. We can talk a little bit more about what those particular concerns are and how CoCs can assist in alleviating those and thinking creatively about how to accomplish those requirements at the local level.

0:07:41.7 MG: To get into a little bit more detail about what we went over during the consultation sessions, we went over the CoC Program requirements in a really broad sense, we discussed CoC responsibilities, the major roles of a Collaborative Applicant, the CoC Board applicants, and then CoC recipients, as well as the HMIS lead, we talked through how to identify their local Continuum of Care, so they know who to reach out to as potential partners, how project applications are submitted, so the application process, and then we gave them a broad overview of local Continuum of Care processes, so that they begin to become more familiar and tried to take out some of the guesswork about how CoCs function at the local level as part of the Continuum of Care competitions. And then we went over the project application process and what to expect, this day, we're planning on submitting this year. Okay. To get back to what in large part precipitated the legislation that is now authorizing tribes and TDHEs to participate in the CoC Program. There's a definite need out there to address homelessness and housing needs in tribal areas.

0:09:16.8 MG: We know that there's definitely a disproportionate impact of homelessness among American-Indian and Alaska Native households. They comprise only 1.3% of the population, but in certain states they can make up to 10% of people experiencing homelessness, so that's a huge disparity. And what we do know is that many people in tribal areas are living up in doubled-up, or overcrowded situations. At the same time though, point-in-time counts have very limited coverage in tribal areas, we still have a lot that we don't know about the extent of homelessness among Native American populations, and the extent of literal homelessness, we have a lot to learn and a lot of data is still missing. Okay. When it comes to tribal participation, and we communicated this as well during the consultation sessions, that all CoC Program requirements apply to tribes and TDHEs who choose to participate. That goes for coordinated entry, referrals still needs to go through the coordinated entry process designated by the Continuum of Care. HMIS data entry requirements are still required for all persons assisted with CoC's Program funds. And all recipients, including tribes and TDHEs must comply with CoC's written standards for providing CoC Program assistance.

0:10:57.8 MG: Having said that, there's still a lot of flexibility here, and we've heard the concerns provided through tribal consultations, "What is that gonna look like for my tribe when it comes to coordinated entry?" And we know just the many different variations of how tribal lands are dispersed through some areas, how there's the checkerboard impact, and a lot of these areas are just not contiguous. How would that work? And also, a real concern about providing just open access to data without any restrictions or being able to keep things confidential. So, in general, there are a lot of ways and flexibilities in the way that you approach data sharing contracts, for example, how you develop your coordinated entry process. And we are really encouraging CoCs and tribes alike to come together through consultation with one another and think through ways that you can make these systems work in a mutually beneficial way. We've had some examples that we've become more familiar with, such as the Tribal Collaborative in Minnesota, where they are participating in HMIS, but they're also able to maintain data integrity, and are comfortable with the way that the process in place for disclosing data. We're starting to learn more about how tribes and CoCs can make these types of processes work.

0:12:49.3 MG: And so, just in a very broad sense, encouraging folks to think outside the box and then come to us if there are any questions about whether you're meeting HUD requirements or not, but it's better to think through options and come to us and make sure that you're meeting requirements and you're being compliant, rather than just limiting yourself from the get-go. As I'm sure many, if not most of you were aware, the fiscal year 2021 competition is already underway, registration has been completed, the NOFO is out, and the formal competition is open. The competition is gonna close November 16th at 8:00 PM Eastern Time. And we've made it clear in the NOFO that, to apply for CoC Program funds, tribes or TDHEs can do that as a project applicant, or a sub-recipient. If they're approved by a CoC, and if an existing CoC is transitioning a Collaborative Applicant, at this time tribes and TDHEs are also eligible to step into that role. But we will get to the reality of this situation, which is that we recognize that many of you, many continuums are already well underway in making their funding decisions, so there are real implications of that for tribes, and we'll get to that in a moment.

0:14:32.1 MG: To dig into the NOFO a little bit deeper, we have facilitated a way for Collaborative Applicants to add to their formula area, and that is a necessary step in order for a project in a formula area, that's a non-entitlement area, metro city, urban county, to apply. So in other words, if a tribe or a TDHE is to apply for a project, their area, their geographic area would need to be covered by an existing Continuum of Care, and the Collaborative Applicant can do that, can add to their formula area by following the steps outlined in the NOFO, which are also listed here. There has to be a tribal resolution authorizing the Collaborative Applicant to claim the geography, there has to be mutual consent and willingness for this formula area to be part of the existing continuum, and that's done through the tribal resolution. The CoC has to include that geography on their HUD form 2991, which is Certification of Consistency with the Consolidated Plan. The geography itself has to be contiguous or needs to overlap with the CoC's existing geography, and this is not gonna make any change to the CoC's PPRN amount.

0:16:11.2 MG: Usually, a geocode or a geography that is claimed by a continuum has a dollar amount associated with it that totals to its Preliminary Pro Rata Need amount, but because of this late stage in the process, as well as the fact that we have not completed the formula yet that would assign a dollar amount to these additional geographic areas, there's no change this year to the PPRN. The change would only impact this year's competition, so it does not have a lasting effect.

And then, there's a separate process for fiscal year 2022, that we'll get to momentarily. And then the deadline to submit this registration amendment is October 22nd, 2021. Collaborative Applicants that are interested in submitting this amendment would do that at the cocnofo@hud.gov email address. And then just another note, the tribes don't have to include a tribal resolution to claim their own reservation or trust lands, but the resolution is required for an existing Collaborative Applicant to claim a geography associated with a tribe or TDHE. The reality is, is that the timing is really tough. Because we were already well into the registration process when the Consolidated Appropriations Act authorized tribal participation, creating a new CoC for fiscal year 2021 is not possible.

0:18:01.0 MG: And registration already having been underway, CoC local processes and funding decisions being also under consideration, CoCs are very likely to have made their local decisions about reallocation and potential bonus projects. We also made that really clear during the tribal consultation sessions, just by virtue of the timing of the NOFO and where we are in the competition. No additional set-aside funding is available specifically for tribes, and CoCs and tribes need to connect.

0:18:43.0 MG: This is the major step that needs to happen to be able to understand tribal priorities, the Continuum of Care's priorities, and also get a better sense of the local processes at the community level. Because we are so far into this Fiscal Year 2021 process, this may very well be a step, or that you can still take in reaching out to tribes and tribes reaching out to CoCs for Fiscal Year 2022, depending on where the CoC is at a local process level. For Fiscal Year 2022, we are going to be including the Preliminary Pro Rata Need amounts for all formula areas, that will include reservations or trust lands, and those will, again, be available to be assigned to Continuums of Care during the Fiscal Year 2022 registration process. And at that point, a dollar amount will be associated with those geographies. A tribal resolution, again, will be required, that permits the CoC to claim a reservation or trust land as part of the CoC geography, so it very much has to be a mutual action where the tribe or the TDHE wants to be a part of an existing CoC, and the CoC gets the tribe's authority and permission via a tribal resolution to do so. And those changes are gonna be applicable to the Fiscal Year 2022 CoC competition. But just to reiterate, any amendments made for the 2021 competition will have no impact on the Fiscal Year 2022 competition, and that process for 2022 will all happen during the registration process.

0:20:50.7 MG: So now to get to more of the nuts and bolts of how you know which tribe to reach out to, or which CoC to reach out to. There are 691 tribes and tribal organizations nationwide, where a portion of the area, and that includes off-reservation trust land, may overlap with 132 Continuums of Care. That's actually a pretty good expansive grouping there. I have a link to a map that HUD created that shows the overlapping areas, and I can put that in the chat right now. You can zoom into your area and actually see the tribes, or vice versa the CoCs where you live, and that will give you a sense of, if there's an overlap between multiple tribes, multiple CoCs, or just a one-to-one relationship. There are many permutations, but it's really helpful just to take a look at a map to start with. And then we have a directory of tribes that continuums can access, to get a better sense of the tribes who are eligible to participate as recipients. And we, HUD, really encourage continuums to reach out to neighboring tribes. We also advised interested tribes and TDHEs to reach out to their local continuums to identify opportunities to partner. We provided tribes during the consultation sessions with the HUD Exchange website where CoC points of contact can be identified.

0:22:53.5 MG: So, another reason why it's really important if you have any changes to the HUD Exchange that you can submit an AAQ or let us know, that we can update that. And so, at least the information is there. But we also have plans to be able to provide technical assistance to help facilitate those conversations at the local level, either through the HUD field office, through the regional ONAP offices, and the US Interagency Council on Homelessness have also been very helpful and has offered to use their local contact regionally to help facilitate this partnership. Just a couple of initial questions that may help you determine which tribe or TDHE to contact, which one is adjacent or overlapping with your CoC's geographic area? Is there one tribe, one TDHE? Are there multiple ones? Are you familiar with any of them? Have you had any conversations in the past? Are there any tribes that are represented within the CoC's geographic area that don't have associated land? That would also be good to know. And then, do any tribal community housing and service organizations have existing relationships with organizations in the CoC area, that you can already leverage any contacts or partnerships that exist already that you can leverage to try to get closer to those who you're intending to partner with?

0:24:49.2 MG: Okay, some additional questions: Is the tribe or the TDHE interested in pursuing homeless assistance activities eligible under the CoC Program? We are hoping that the outreach that we're doing to tribes and TDHEs is effective and expansive, but it could very well be that the local tribe or TDHE in your area is not aware of this opportunity to partner, and the additional availability of homeless assistance funding. In reaching out to them, are they aware of this opportunity? Are they interested in pursuing an activity that's eligible under CoC? Are they interested in submitting a project application? More likely for next year, but depending on the stage of your internal process, would even now be realistic, or you could start considering re-allocating funds next year to support new projects based on the needs in your area? And then, are the local application guidelines that you have put in place as a continuum, are they able to accommodate applicants that are interested in applying at this point in the process this year? And then, if not, next year? And then, in particular, in anticipation of next year, taking a close look at your rating and ranking process, do you identify any potential barriers that tribal participation is really important, so that you're not... Because of the current process that you have in place, crossing really great potential partners out of consideration.

0:26:36.0 MG: And some ways that we've started to think and hear about this is poring on data that tribes haven't been able to collect to date or haven't known to collect, or maybe they don't have a history of specific homeless assistance programs to be able to collect related data. How are you scoring on CoC attendance or participation requirements? And I think we're aware that a lot of you have CoC attendance requirements that, maybe nine out of 10 CoC general meetings that you have a year, in order to be a candidate for... Or a competitive candidate for the competition, for your local competition, you have to be, have a 90% attendance rate. Would that render a tribe or a TDHE ineligible just from the get-go because they haven't been able to participate up to this point? Poring on outcome measures that tribes haven't tracked to date, or other data-related requirements that may just be at a standard that's untenable at this point because of the lack of history tribes have had in participating. So, those are things that I think HUD is also... We're also thinking about, how can we make the CoC Program more open to participation for tribes? So, any barriers that we have at the federal and local level are really important to consider.

0:28:29.0 MG: So, in an effort to build capacity and inclusivity, can you provide training for staff on using HMIS and other core functions of the CoC? What kind of training can the CoC do to increase tribal familiarity with the CoC Program? Can you provide HMIS funding for software and

licenses for tribes and TDHE recipients? And then planning in partnership with tribes for expanded coordinated entry, to make sure that you're including potential clients for the tribal community, thinking of creative ways to think through data partnerships. And I think that, the most important thing is just to have an open conversation and take this opportunity of partnering in a really inclusive way, so that you're not closing off yourself to opportunities prematurely, but really thinking in a creative way for how to make these things work. And as the next step, we at the federal level are thinking through ways that we can also facilitate those partnerships. So, are there TA opportunities that we can... Written materials that will describe how tribes can participate in the Continuum of Care Program, lifting up really promising practices for data sharing agreements or approaches to coordinated entry, best practices or highlights for how tribes and CoCs are starting to facilitate partnership-building at the local level?

0:30:23.1 MG: And if you are an example that we could share, we'd love to hear from you to be able to just basically share what works, what's working across the country. At the same time, if you have questions about how to reach a tribe, or if you're a tribe how to reach a Continuum of Care, or if you have ideas for how to approach coordinated entry or HMIS requirements or anything else, if you're a tribe or a TDHE you can continue to submit comments to coctribalconsult@hud.gov, and you can also submit questions to the HUD Exchange AAQ portal. If you have a CoC competition question, I've also put the cocnofo@hud.gov email address where you can submit your questions on competition-related issues. The other thing I just wanted to mention is the availability of direct TA. Of course we're in the midst of an open competition, and so direct TA can't be provided at this time, but we are definitely growing our bench of TA providers who have worked with tribes before, who are experienced in both the Continuum of Care Program, as well as Office of Native American Program funding those programs, and also have a history of working in tribal areas.

0:32:05.5 MG: Those opportunities will also be available for on-call TA once the competition concludes, and you can submit a TA request on the HUD Exchange, and I will post that link here. And I think that, those direct TA engagements, we've already had a few to date, and they can really be helpful both for us at the federal level to understand what works and what the challenges are, but then it can certainly help at the local level for you, or partners, CoCs and tribes to figure out how they can work together, and end homelessness as partners. With that, I am going to shift over to our Q&A session. Norm Suchar, the Director of HUD's Office of Special Needs Assistance Programs here who is going to help facilitate our Q&A.

0:33:19.9 Norm Suchar: Great. Thank you so much, Marlisa, great presentation. We'll dive into the questions here. The first one is for you, Marlisa, we have a question about what it means to be a tribal organisation or TDHE, are we talking only federally-recognized? Or what's included in this definition?

0:33:43.0 MG: So, tribes, this is the same definition used in NAHASDA, the same IHBG, ICDBG, recipients would also be included there. Most prominently federally-recognized tribes, but I believe that there are... There may be, I think, up to four state-recognized tribes in that mix, but predominantly federally-recognized tribes.

0:34:15.9 NS: Great, thank you. And there are several questions that follow along the same theme that I'd like to address. Let me read out three of these and then I can talk about the response to those. One question and comment is that, "I'm hoping that adequate funding will be dedicated to tribal projects and added to CoC Pro Rata amounts to cover new tribal projects, otherwise small-

world CoCs do not have enough bonus funding." Another question was, "If there are no dollars allocated for tribes, and if the tribe wanted to participate in the CoC competition we would be taking dollars away from another agency." And a separate question said, "We have reached out to tribes and anticipate at least one new project application in this round. Is there any chance HUD will incentivize these efforts by providing bonus funding next year?" I wanted to take a step back and talk about how we're thinking about the tribal participation in the CoC Program and funding over the long-term. As Marlisa mentioned, we just got this authority in last December, and tribal participation in the Continuum of Care Program has a lot of nuances and a lot of facets. And also, we have a lot to learn about this.

0:35:43.6 NS: We are very much trying to do this right, and doing this over time, to make sure we put in the the right amount of effort and also to do enough tribal consultation, so we do really understand the needs of tribes. This year where we put in a provision that tribes and TDHE is gonna apply for funds as a project applicant, but this is really just the first step in what we see as a long-term project to really fully, as much as we can, integrate tribes and TDHEs in the CoC process. So what is true of this year, I think we plan to build on this in future years. Now, I don't know exactly what funding will be available in future years. Our funding is largely determined by Congress and we don't always know what's going to happen in the future, but we're definitely very interested in promoting funding for tribal organizations, either, I don't know if we'll get a special allocation or we'll do it through incentives or whatever, but we are definitely interested in the future in promoting and incentivizing tribal participation. Unfortunately, I don't know exactly what that's going to look like quite yet. Again, we have a lot to learn, and so we are trying to be both patient and take in all the information we need to make this work well.

0:37:18.0 NS: The other part of this is that, we know that tribal participation in the Continuum of Care process at the local level is really going to be a long-term process. We wanted to get it started this year and to have those conversations start, but we know that a true partnership is going to take time and it's going to happen over the course of several years. So we plan to very much promote that partnership in as many ways as we can think of over the coming years, and to make tribes more fully integrated into the legal structure of the CoC Program in the coming years. All that is to say that what you're seeing in this year's NOFO is really step one in the process, and we plan to build on that. The other thing I'll say in response to this is, if you have suggestions for us, we'd love to hear them. You can type into the chat window here, you can email Marlisa or I or anyone you happen to know at the SNAPS Office, and we are eager for suggestions, recommendations, just any information that you think would be helpful to us. So thank you. Marlisa, slightly different question here, I wanna turn this over to you. The question is about, "Can tribes limit project participants to tribal members only?"

0:38:52.0 MG: This is a really good question. And there are so many permutations of the situation. Part of it has to do with whether you're using just CoC funding, whether you're using CoC funding in conjunction with other NAHASDA funding. It also depends on whether you're carrying out the activity in tribal areas, or whether you're carrying it out in non-tribal areas. So, there are a lot of different scenarios where this could play out. And although we have tried our best to come up with a streamlined answer for tribal preference, we... Our [0:39:40.7] _____, they're sticking to that "It depends" answer. This would be a situation where, if you're thinking of a particular scenario, it would be really good to get... To submit an AAQ to the HUD Exchange, so that we could parse through the geography, the different funding sources, and so we're very much expecting to take these questions on a case-by-case basis. And then I think down the line, be able to come up with

more general guidance and a framework to provide CoCs and tribes with information about what the preference will be under what circumstances.

0:40:33.0 NS: Great, thank you. We have another question here that I wanted to run by you. The question is, "It would be great if tribes could... " Or it's kind of a suggestion, but I wonder if you could talk about this. "It would be great if tribes could apply for CoC project in areas that are not geographically contiguous to reservation land," and they give an example from Minnesota about tribal members living in urban areas. We talked about the issue of claiming geography and how the geography claim had to be contiguous, but can you talk about, can a tribe that's not geographically contiguous to, say, a city, I don't know, Minneapolis maybe in this example, could they apply for a project in the Minneapolis CoC, and would that be allowed?

0:41:36.0 MG: Yes. Tribes definitely have the ability to carry out activities off of reservation or tribal land. As you were alluding to, Norm, it's only in situations where a CoC would be claiming a geography that's associated with the tribe, so trust land or off-reservation trust land. When the geography is being claimed, that geography has to be either contiguous or overlapping with the CoC's geographic area, but that limitation does not apply to where tribes could actually carry out activities. I think that, being able to support culturally competent relevant services in urban areas is a really great way that the tribes can participate in the Continuum of Care Program, so that's absolutely allowed and encouraged.

0:42:42.0 NS: And so I wanna talk about a little more about the geographic area issue and what exactly that means, and when it applies, 'cause there's another question here that asks about, if a recipient or sub-recipient is operating a project in a tribal area, do they need a letter from the tribe that supports their project? The issue of geographic area is the strange nuance of the CoC Program, where if you want to... If a CoC or a non-profit or a government organization wants to operate a project, they have to do it in the CoC's geographic area, and the CoC has to designate its geographic area, they have to register for their geographic area. Now, until we got this legislation, tribal areas were not eligible to be included in the CoC's geographic area, so there was no... CoCs just don't claim tribal areas and trust lands and reservations I should say, in their geographic area, but the legislation allows us to do that. What the issue of claiming geography means is that if you want to operate a project on a trust land or reservation, or another area that's not claimed by a CoC already, the first step is that the CoC has to add that area, that geographic area to their CoC registration.

0:44:24.4 NS: And so that's the process that Marlisa talked about. And that would require a letter from the relevant tribe to make sure that CoCs aren't just... Not that they would do this, but that they're not just claiming geographic area without really consulting and having the approval of the relevant tribe or tribal organization. So, that's the part about claiming geographic area. Now, that's different, as Marlisa mentioned, than having a project and where that project operates. A tribe could apply for and receive funding for a project that operates on trust lands or reservations in a tribal area, or another area where they maybe have a tribal population that they wanna serve. But in all cases where those projects are located on trust lands or reservations, they would have to have approval of, again, the relevant tribe or tribal organization. And if the project sponsor is that tribe or tribal organization, they obviously don't need that letter.

0:45:37.8 NS: I think it's a little stickier if the tribal organization is a sub-recipient, I think they would likely still need the recipient, the applicant would likely need to have a letter of support from the tribal or tribal organization, so we would still recommend doing that. Great question, thank you.

And the CoC process can be a little complicated and we're happy to walk through these things as we come across them. So, let's look at some of the other questions we have here. We have a question about, Marlisa, "Are all tribes eligible to partner with CoCs?" I know you talked about the issues with federally-recognized tribes and organizations. Are there other tribes or tribal organizations that are not federally-recognized that would also be eligible under this language? Or is this really just the organizations covered under NAHASDA?

0:47:00.2 MG: Yes, we use the same definition as NAHASDA, so it would be the same universe of eligible tribes.

0:47:13.2 NS: Great. And we have a separate question about technical assistance resources. And the question is, "Will HUD's formula for allocating technical assistance time and resources change with this initiative? Currently, technical assistance is most available to large city, or large metro Continuums of Care with only nominal assistance to other CoCs." We'll just comment that I think that's true in some cases, but not entirely. But can you talk about what our plans for technical assistance are to support tribal participation?

0:47:49.5 MG: Yeah. We've had our first experience with providing TA directly to tribes through a set-aside that was earmarked for developing partnerships between tribes and CoCs, as well as developing permanent supportive housing specifically for American-Indian and Alaska Natives experiencing homelessness. That started around 2016, 2017. And so, we've gained greater familiarity with technical assistance providers who have existing relationships with a number of tribes who are really familiar with some of the obstacles that tribes face when it comes to using different federal resources together, the complicated nature of that, as well as juggling different regulations, and just knowing the true nature of housing challenges of homelessness in tribal areas. Through that, we've increased our TA capacity to be able to provide assistance directly to tribes. We've intentionally, since the Consolidated Appropriations Act, sought out additional TA providers who have both expertise in working with tribes, as well as in the Continuum of Care Program.

0:49:27.2 MG: We've got some great technical assistance providers who have started working on materials for us, and who are poised to start working directly with both tribes and CoCs in partnership, to grow these relationships, and start getting through some of the weedier issues that are gonna be challenging but really interesting to get through together. That's gonna be available if you submit a TA request, either on the CoC side, or if you are a tribe interested in direct TA you can submit the TA request through the HUD Exchange, and then we can work on assigning that. Definitely in consideration with the resources that we have, but this is definitely something that is important to us, and capacity that we wanna build. Those TA resources are there for your use.

0:50:30.4 NS: Great. Thank you. There's another question, or more a comment that I was hoping you could talk about, because I think it'll help clear up a few things here. The question is about whether it's more effective for tribes to be communicating with the CoC, as opposed to the specific providers who are providing homeless assistance. Because a lot of tribes have relationships with specific non-profit providers. And so, can you talk about how specific providers should be involved in these conversations?

0:51:16.5 MG: Yeah, I think that, and I may have been taking that question in the wrong direction but, I guess in general I would say that, for tribes to be directly communicating with the Continuum of Care, or the Collaborative Applicant who is in charge of running the local competition, that's

really important to get a sense of available funding, their priorities, get some more insight into how they're rating and ranking projects, and their overall strategy for addressing homelessness in their continuum's geographic area. Those types of questions or conversations are really important to have, but then also, for tribes to be having conversations with local providers. And I'm not sure if that's a question about providers who have experienced serving tribal members and American-Indian, Alaska Native populations, or other local Continuum of Care providers. I'm not totally sure.

0:52:35.1 NS: Yeah. So, probably, 'cause I didn't read the whole question to you, where they... I think one of the... There's one nuance I wanna add to your really good comment there, which is that, we talk about the CoC, and there are actually two different concepts here. The Continuum of Care is... When we talk about the Continuum of Care, we typically talk about the large body of stakeholders who work together in a community to end homelessness. That includes providers, it includes a whole host of advocates, people with lived experience, government organizations, a whole host of researchers, a whole host of stakeholders, but then there's a separate entity called the "Collaborative Applicant" who is responsible for carrying out the administrative duties of a CoC. In this particular question, I think the questioner was saying, "Well, should we really be talking to our Collaborative Applicant or the providers?" And I think in this context, you definitely wanna be talking to both, and as much as possible be talking to both at the same time.

0:53:49.9 NS: So these are the kinds of things that you can talk about in regular Continuum of Care meetings, whether your Continuum of Care meets monthly or quarterly, some may meet annually, but those are really good questions to have in those kinds of open forums, both because it's helpful for the other stakeholders to see, to learn about the nuances and uniqueness of tribal issues, but also because there's a lot of coordination that's gonna be needed between the tribes, between the Collaborative Applicant, and between the specific providers. I think our suggestion is, there's no way to over-coordinate right now, at the beginning, so we'd encourage you to talk to your Collaborative Applicants, your providers, all of the above. And again, we are more than happy to provide technical assistance to help you work through how to do that. I think those are our big questions here. We will make the slides available, I don't know if we mentioned that, the recording of this webinar available, we'll post it, and so you'll be able to see the slides and the recording of the webinar. But I think that's it for questions.

0:55:18.9 MG: Okay, great. Thanks, Norm. So with that, I'm just going to reinforce what Norm just said about, you can't over-coordinate at this stage, and that also goes with your communication to HUD, so please use... I'll put this back on the screen, please use the CoC Tribal Consult's email address to... If you're a tribe or TDHE to give your comments, give your recommendations, your concerns, make sure we hear them and we will respond to you. That's really important. And then, you can't over-communicate when it comes to that. And then also submitting TA requests, if you're a Continuum of Care, submitting an AAQ. Any TA needs, any product ideas that you have for what would be helpful in helping you all facilitate these partnerships, we are open ears, and you can do that by just communicating with us through one of those venues or through an existing TA provider that you may be working with. We wanna do everything that we can to make this work. We're extremely excited that this is finally a reality and that we can hit the ground running and welcoming our new partners, tribes and TDHEs into the Continuum of Care Program. And we really look forward to seeing all of the great work that you all...