# CoC Program Participation Decision and Assessment

The Continuum of Care (CoC) Program Participation Decision and Assessment resource poses a series of questions to assist Tribes, Tribally Designated Housing Entities (TDHEs), and organizations new to the CoC Program in deciding whether the best path forward would be to join an existing CoC and apply for project funds or develop a new CoC for future CoC Program competitions.

This resource brings together the program considerations explored in the supporting resources: <u>Connecting Community</u> <u>Activities and CoC Program Activities</u>, <u>CoC Program Recipient</u> <u>and CoC Roles</u>, and <u>Determining the Amount of Available CoC</u> <u>Program Funds</u>.

Questions are organized into three sections:

- Participation Decision: Decide whether the CoC Program meets Tribal community needs
- Self-assessment 1: Join an Existing CoC and Apply for CoC Funding
- Self-assessment 2: Establish a New CoC and Apply for CoC Funding

The first section includes questions with answer choices "Yes" and "No," but it is likely that there are many Tribes and TDHEs that are still in the "Maybe" phase. While reviewing the decision tree, we encourage you to treat a "Maybe" as a "Yes" and continue through the questions. Each question has a supplemental section that explains the responses, provides context for the question, and offers other considerations. At the end of the first section, if you are still interested in exploring the program, self-assessments are offered next.

Self-assessments 1 and 2 build upon the decision you made and explore which CoC Program option is right for the Tribal community. Each self-assessment poses a set of questions with supplementary information that explains the responses and offers other considerations. The questions in the self-assessment are meant to facilitate community discussions about whether to pursue a path towards joining an existing CoC or a path towards establishing a new CoC. These discussions will lead to the best fit for each Tribal community. The <u>Continuing The CoC Program Paths</u> resource then offers specific steps to start moving down those paths.

# Decision and Assessment

<u>The CoC Program Participation</u> <u>Decision-Making Approach</u> centers around three aspects of the CoC Program–activities, roles, and funding.

## CoC Program Participation Decision: Decide Whether the CoC Program Meets Tribal Community Needs

The CoC Program Participation Decision questions are designed to help Tribal communities decide whether the CoC Program would address the needs within their community. The <u>Connecting</u> <u>Community Activities and CoC Program Activities</u> resource can assist with this series of questions.

### **CoC Program Participation Decision Tree**



#### Are there people who are homeless or housing insecure who need housing or services?

#### Answer:

- Yes: Continue to the next question.
- No: If your community does not have people with these types of needs, it is unlikely that you
  would be able to submit an application that would be awarded funds.
- Maybe: Treat as a Yes and continue to the next question.

**Context for this question**: The CoC Program is intended to help people who meet specific definitions of homelessness, which includes having no place to live or no stable place to live. Review the discussions you had during Worksheet 1: Determine Individual and Family Homeless Situations and Worksheet 2: Assess and Prioritize Homeless Situations in <u>Connecting Community Activities and CoC</u> <u>Program Activities</u>.

**Other considerations**: Understanding what homelessness and housing insecurity looks like under the CoC Program is beneficial to deciding if the CoC Program will be a good fit for Tribal communities. Review <u>CoC and ESG Homeless Eligibility - Overview.</u>

Would additional housing and services meet the needs?

#### Answer:

- Yes: Continue to the next question.
- No: If your community has sufficient housing and/or homeless services in place to meet people's needs, CoC Program funds and the accompanying requirements may not benefit your community.
- Maybe: Treat as a Yes and continue to the next question.

**Context for this question**: The CoC Program pays for several types of housing costs and services. In most cases, funds can be combined with funds from other sources to strengthen and expand housing and services. Review the discussions you had during Worksheet 3: Identify Activities that Need Funding in <u>Connecting Community Activities and CoC Program Activities</u>.

**Other considerations**: Even when communities have available housing units, provide rental assistance, and offer services to people who are homeless, they often do not have enough to meet everyone's needs. In those circumstances, CoC Program funds may be beneficial.

#### Does the CoC Program fund the type of housing and services that meet the needs?

#### Answer:

- Yes: Continue to Self-assessment 1 or 2.
- No: If your community wants to focus on activities that are not funded by the CoC Program, it is unlikely that you would be able to submit an application that would be awarded funds.
- Maybe: Treat as a Yes and continue to the next question.

**Context for this question**: The CoC Program allows the funds to be spent on specific activities (referred to as "eligible activities") and prohibits spending on other activities. Review the discussions you had during Worksheet 3: Identify Activities that Need Funding in <u>Connecting Community Activities</u> <u>and CoC Program Activities</u>.

**Other considerations**: Tribal communities may be able to develop a new project centered around eligible CoC Program activities. If a new project is not feasible, then as an initial step to participating in the CoC Program, Tribal communities could consider how CoC Program funds could potentially expand an existing project funded through another funding source. Similarly, Tribal communities could leverage CoC Program funds to obtain and combine funding to address an unmet need. These options notwithstanding, not all activities that Tribal communities need to serve those experiencing homelessness are eligible under the CoC Program and pursuing other funds may be a more suitable option.

# Self-assessment 1: Join an Existing CoC and Apply for CoC Funding

Self-assessment 1 is designed to help Tribal communities decide whether joining an existing CoC would best meet the needs of their community. Joining an existing CoC comes with many responsibilities and commitment of time to submit a successful funding application. However, nearly every community across the country has a CoC—some cover a city or county while others cover a region or an entire state. Nearly every Tribal community will be likely to find a CoC to join if they choose to do so.

#### Can we meet the responsibilities of a CoC recipient?

There are a multitude of responsibilities that accompany the decision to join an existing CoC and apply for CoC funds. Review the discussions you had during Worksheet 1: Reflecting on Roles and Responsibilities in <u>CoC Program Recipient and CoC Roles</u>.

**Other considerations**: If your community is unable to meet all the responsibilities of a CoC Program recipient, you may want to consider which responsibilities you are unable to meet and discuss them with the local CoC. It takes time to acquire the experience, staff allocation, and funding that enable organizations to meet their CoC Program responsibilities. The local CoC could partner with you to take incremental steps.

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#### Are we prepared to pursue our prioritized project(s)?

The CoC Program pays for several types of housing costs and services. In most cases, funds can be combined with funds from other sources to strengthen and expand housing and services. Review the discussions you had during Worksheet 4: Identify a Funding Priority in <u>Connecting Community</u> <u>Activities and CoC Program Activities</u>. Insert your prioritized project activities from Worksheet 4C: Prioritize the Funding Need and then consider whether you want to pursue one or more of the projects at this time, and if so, whether to create a new project or expand an existing one.

#### **Response:**

Prioritized Project Activity (1)

Prioritized Project Activity (2)

Prioritized Project Activity (3)

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Is the potential CoC project funding sufficient for us to apply for CoC Program funds to provide housing and services?

CoC Program funding is highly competitive and local CoC priorities may or may not align with the Tribal communities' priorities. Review the discussions you had during Worksheet 1: Path 1: Assess Potential Funding Available for New Projects in an Existing CoC in <u>Determining the Amount of</u> <u>Available CoC Program Funds.</u>

**Other considerations**: While it is possible to calculate the potential amount available based on publicly available information, the actual amount available is likely to be considerably less. If you choose to participate in the CoC Program, connecting with the local CoC should be among the first actions to take.

#### Are we ready to apply for CoC Program project funding?

Readiness to apply for project funding does not necessarily mean that you are able to sit down at this moment and complete a CoC Program project application; instead, it refers to being able to undertake the steps that lead up to and take you through the application process.

The resources preceding this *CoC Program Participation Decision and Assessment* resource have briefly mentioned the CoC Program annual application process. The application process requires significant staff time from the project applicant, but there are numerous resources available that take project applicants step-by-step through the application process. They are published each year on the <u>CoC</u> <u>Program Competition | HUD.gov</u> page and the <u>*e-snaps Resources*</u> page on the HUD Exchange. In addition, HUD typically hosts webinars that discuss the competition application process.

**Other considerations**: If your community is not able at this time to apply for CoC Program funding, you may still want to consider participating in CoC activities with the local CoC or reassessing your interest in the CoC Program at a later time.

**Next steps**: If upon completion of this self-assessment you decide you are prepared to move forward with joining an existing CoC and applying for CoC Program funding, please review <u>Continuing the CoC</u> <u>Program Paths</u>.

# Self-assessment 2: Establish a New CoC and Apply for CoC Funding

Self-assessment 2 is designed to help Tribes and TDHEs decide whether establishing a new CoC and pursuing CoC Program funding would be beneficial in meeting their community needs. Establishing a new CoC is accompanied by a wide range of requirements that take substantial time to meet. Proceeding down the path to properly establish a CoC and meet HUD requirements will take a considerable amount of time—most likely years—to complete. If your Tribe or TDHE decides this path is the best one for your community, there will be resources available to further plan and implement your decision.

#### Can we meet the responsibilities of establishing and operating a new CoC?

Before deciding to dedicate the considerable time and work to establish a new CoC, Tribes and TDHEs may find it helpful to consider the responsibilities involved in operating a CoC. Review the discussions you had during Worksheet 1: Reflecting on Roles and Responsibilities in <u>CoC Program Recipient and</u> <u>CoC Roles</u>.

**Other Considerations**: Establishing and operating a new CoC is a long-term endeavor, and Tribes and TDHEs can take incremental steps following a timeline identified by the Tribal community to progress towards community goals.

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#### Is the available CoC Planning funding sufficient to establish a new CoC?

CoC Program funding is highly competitive and starting a new CoC requires an investment of staff time and resources. Review the discussions you had during Worksheet 2: Path 2: Assess Potential Funding Available for a New CoC in <u>Determining the Amount of Available CoC Program Funds</u> to determine whether it is feasible and cost effective for the Tribal community to dedicate the required time, staffing, and investment for the amount of CoC funding that is potentially available.

**Other considerations**: While it is possible to calculate the potential amount available based on publicly available information, the actual amount available is determined by a HUD formula and may be less than the calculated estimate. Additionally, it is common for newly-formed CoCs to have only one CoC Planning grant in their portfolio for a few years while building their capacity, expanding their activities, and gathering performance data that can help improve their CoC application scoring.

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#### Are we prepared to pursue our prioritized project(s)?

The CoC Program pays for several types of housing costs and services. In most cases, funds can be combined with funds from other sources to strengthen and expand housing and services. Review the discussions you had during Worksheet 4: Identify a Funding Priority in <u>Connecting Community</u> <u>Activities and CoC Program Activities</u>. Insert your prioritized project activities from Worksheet 4C: Prioritize the Funding Need and then consider whether you want to pursue one or more of the projects at this time, and if so, whether to create a new project or expand an existing one.

- Prioritized Project Activity
- Prioritized Project Activity (2)
- Prioritized Project Activity (3)

Is the potential CoC project funding sufficient for us to apply for CoC Program funds to provide housing and services?

Newly-established CoCs can submit project applications through CoC Bonus and DV Bonus funding. Review the discussions you had during Worksheet 2: Path 2: Assess Potential Funding Available for a New CoC in <u>Determining the Amount of Available CoC Program Funds.</u>

**Other considerations**: While it is possible to calculate the potential amount available based on publicly available information, the actual amount available is likely to be considerably less.

#### Are we ready to establish a new CoC and apply for CoC Program funding?

Readiness to apply for CoC Program funding does not necessarily mean that you are able to sit down at this moment and complete the CoC Program's CoC Planning application and/or project application(s); instead, it refers to being able to undertake the steps that lead up to and take you through the application process. Whether the application is submitted in the upcoming competition cycle, or the next one, or the one after that, is decided upon by the Tribal community.

The resources preceding this *CoC Program Participation Decision and Assessment* resource have briefly mentioned the CoC Program annual registration and application process. The CoC is responsible for submitting the consolidated application to HUD, which consists of a CoC Application with information about the CoC and a CoC Priority Listing with rankings for the CoC's project applications. The registration and application process requires significant staff time from CoC staff, but there are numerous resources available that take CoCs (and project applicants) step-by-step through the application process. They are published each year on the <u>CoC Program Competition | HUD.gov</u> page and the <u>e-snaps Resources</u> page on the HUD Exchange. In addition, HUD typically hosts webinars that discuss the registration and competition application process.

When ready to start the process, Tribes and TDHEs can find registration information in the <u>CoC</u> <u>Program Registration Notice (Notice CPD-22-02)</u>. HUD publishes separately the annual Notice of Funding Opportunity (NOFO) on <u>Grants.gov</u>; the most recent NOFO is available for review on the <u>CoC</u> <u>Program Competition | HUD.gov</u> page.

**Other considerations**: Although establishing a new CoC Program is time-consuming and laborintensive, Tribal communities can choose their own pace for undertaking CoC-level activities and apply for funding in stages if they would like, such as applying first for a CoC Planning grant and then applying later for project funding.

If starting a new CoC is not the right option at this time, you may still want to consider joining an existing CoC and applying for project funding. Self-assessment 1 in this document may help you in making that decision.

**Next steps**: If upon completion of this self-assessment you decide you are prepared to move forward with establishing a new CoC, please review <u>Continuing the CoC Program Paths</u>.

## **Next Steps**

Now that you have come to the end of the *CoC Program Participation Decision and Assessment* resource, we hope you have decided to participate in the CoC Program. If you have decided not to participate, we thank you for considering the CoC Program and welcome you to review these resources again in the future if you are interested.

Many of the questions in this resource are more easily answered if you have a good understanding of the CoC Program activities, the responsibilities of the various roles (recipient and CoC), the way funding is distributed in the CoC Program, and how to calculate the amount potentially available for your Tribal community. If you would like to review any of the resources that support this resource, they are located at <u>CoC Program Resources for Tribes and TDHEs</u> on the HUD Exchange.

If you are still interested in the CoC Program, the <u>Continuing the CoC Program Paths</u> resource identifies the action steps to continue the two paths—joining an existing CoC or establishing a new CoC.



### **Participation Decision-Making Pathway**

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If you would like to connect with HUD staff, contact information is here: <u>HUD's 10 Field Offices</u> and <u>HUD's 6 ONAP Area Offices</u>

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