

CoC Program Participation

Decision-Making Approach

Thank you for your interest in participating in the Continuum of Care (CoC) Program. For Tribal communities considering whether to pursue CoC Program funds, this resource is the starting point in the [CoC Program Series for Tribal Communities and Organizations New to the CoC Program](#).

Throughout the document there are links to resources that explore in more detail the ways Tribes, TDHEs, and other organizations can participate in the CoC Program; the activities that can be undertaken to address community needs; and the potential amount of funding available. These resources offer worksheets Tribal communities can use to assess whether the CoC Program is right for them. After you finish reviewing this document, please review:

- [CoC Program Recipient and CoC Roles](#)
- [Connecting Tribal Community Activities and CoC Program Activities](#)
- [Determining the Amount of Available CoC Program Funds](#)

While considering whether to participate in the program, Tribes and TDHEs can also keep in mind that if they decide to engage in the program, there are two paths to take that are described in this resource:

1 Join an existing CoC and apply for funds through its application process

or

2 Establish a new CoC and apply for funds through the new CoC

Following these four resources is a [CoC Program Participation Decision and Assessment resource](#) that poses a series of questions based on the information in this resource and the worksheets in the three resources listed above; the questions are designed to end with decisions about whether to participate or not in the CoC Program and to what extent Tribal communities want to participate, in other words, whether to join an existing CoC or establish a new CoC. The last resource in this series describes what to do next: [Continuing the CoC Program Paths](#).

This Resource has Two Goals:

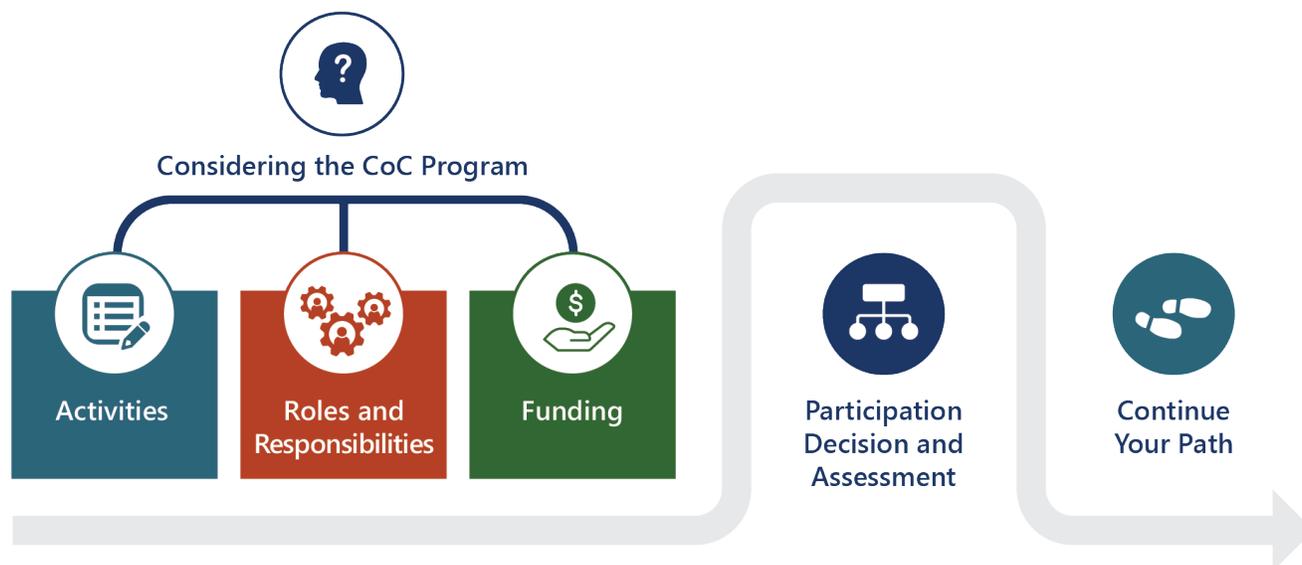


Introduce the CoC Program to Tribal communities



Describe a decision-making approach that considers roles, activities, and funding

Participation Decision-Making Pathway



This decision-making approach is just one way to organize questions and information so Tribal communities can compare their priorities with what the CoC Program offers. If Tribal communities choose to use these materials to assist in their consideration of the CoC Program, please note that the decisions made using these materials do not need to be considered final; rather, they reflect what you want to do in the present. The resources can also be used in the future if/when you are ready to reassess the needs of people experiencing homelessness and housing instability, community activities, and funding goals.

Roles: Ways to Participate in the CoC Program

There are two primary ways to participate in the CoC Program—as a recipient and as a CoC.

The Role of a Recipient

“Recipient” is the term used for an organization that applies for and is awarded CoC Program funds and executes a grant agreement with HUD for those CoC Program funds.

Recipients have two primary roles:

- **Operating housing and homeless services programs.**

A recipient receives CoC Program funds to operate a housing program and provide services that support the people who meet the definitions of persons experiencing homelessness or housing instability.

Typically, recipients use other sources of funding for project expenses first and then request reimbursement with CoC Program funds. The request needs to include documentation that shows the funds were spent on costs allowed by the [CoC Program Interim Rule](#). Advances in funds may be permitted in specific cases, but in practice, the program follows a reimbursement method.

Other sources of funding can include Tribal funds or private funds. CoC Program funds cannot be used to pay for a cost paid for by duplicative federal, State, or local program, such as a rental subsidy like the Housing Choice Voucher Program.

- **Participating in CoC-related activities.** As a recipient in the CoC Program, an organization has responsibilities beyond operating its housing program and providing services. The recipient is part of a CoC and participates in CoC-related activities, such as participating in data collection efforts to identify people experiencing homelessness and/or housing insecurity and coordinating with other organizations to match people who need assistance with organizations that can help them.

The Role of a CoC

A CoC is a term that refers to a group of organizations that work together to address the needs of people experiencing homelessness and/or housing insecurity in a community. A CoC must meet numerous [CoC Program requirements](#) to receive funding, including the following:

- **Establishing a CoC Board.** The CoC establishes a CoC Board that represents the relevant organizations in the community, and the CoC needs to hold full membership meetings at least twice annually.
- **Selecting a Collaborative Applicant.** To meet its many responsibilities, the CoC selects one organization to lead the activities and be responsible for applying for CoC Program funds on behalf of the entire CoC. When an organization takes on this role, it is called a Collaborative Applicant.
- **Developing a CoC governance charter.** The CoC develops, follows, and updates annually a governance charter, which includes the procedures and policies needed to comply with CoC Program regulatory requirements.

The [CoC Program Recipient and CoC Roles](#) resource has more detailed information about the roles and responsibilities of recipients and CoCs.

Recipients

The following sections describe recipient activities and funding.



Activities: What housing and services activities can be funded by the CoC Program?

As a recipient, an organization can spend CoC Program funds on several activities, including the following:

- Housing subsidies
- Supportive services (like case management) for those enrolled in housing program(s)
- Buying, developing, and/or rehabilitating housing
- Housing operating costs (like maintenance on the building, insurance, security, etc.)
- Completing data entry and reporting requirements
- Administrative costs (costs associated with project implementation, like invoicing)

The [Connecting Tribal Community Activities and CoC Program Activities](#) resource includes a series of worksheets and questions that a Tribal community can review to identify its activities and priorities and assess whether the CoC Program pays for the activities a Tribal community wants to implement.



Funding: What amount of funding is *potentially* available for an individual project?

Determining the funding amount that might be available for a new project is challenging because CoCs are limited in the total funding amount they can request, and they are limited by the ways they can designate part of that funding for new projects.

Every CoC has a limit on the amount of funding for which it can apply. The total amount of funding requested for all project applications that the CoC submits to HUD cannot exceed the limit on the total dollar amount available for the CoC.

Furthermore, most existing CoCs have an inventory of projects, and they tend to prioritize renewing their eligible projects.

If a CoC considers submitting a project application for a new project, it has two ways to do so:

- A CoC can take funding away from an existing project and put that money towards an application for a new project. (This process is called “reallocation.”) In this case, the project’s budget amount would need to fit under the CoC’s total funding limit.
- A CoC can submit an application for a new project through “bonus funds.” There is also a limit on the bonus funds, but it is a separate category of funds dedicated to particular types of projects.

CoCs typically publicly post the amount of funding available for new projects as part of their announcement for the local competition that precedes HUD’s annual competition. Prospective applicants can attend CoC meetings, sign up for listservs and email groups, and contact the Collaborative Applicant to make sure the CoC knows they want up-to-date information about applying for funds.

All organizations applying for funds submit their applications to their designated CoC for review prior to the CoC submitting a package of applications to HUD.

To ensure that every organization has an opportunity to apply for funds, every CoC is required to have a documented process for reviewing applications and making decisions that is transparent to everyone in the community and applied equally to all organizations that want to apply for funding.

CoC Contact Information

The [Grantee Contact Information – HUD Exchange](#) page has contact information for all CoCs.

The [Determining the Amount of Available CoC Program Funds](#) resource has more information on funding amounts and includes sample calculations.

The following sections describe CoC activities and funding.



Activities: What CoC activities can be funded by a CoC Planning grant?

Collaborative Applicants can apply for a grant called a CoC Planning grant. Rather than funding a feasibility study or the development of an operations plan, a CoC Planning grant specifically helps pay for an organization's staffing and other costs related to operating a CoC. The CoC Planning grant can be used for the following activities:

- Coordinating with organizations across the CoC that serve homeless individuals and families
- Developing a CoC housing and service system
- Evaluating the outcomes of project with CoC Program funds (i.e., evaluate performance)
- Monitoring recipients and enforcing compliance with program requirements
- Preparing and submitting all applications to HUD on behalf of the CoC membership
- Locating and counting the number of people experiencing homelessness and/or housing insecurity

Typically, the CoC Planning grant does not have enough funding to cover all costs, so the Collaborative Applicant will need other supplementary funding.



Funding: What amount of funding is *potentially* available for a CoC Planning grant?

The CoC Planning grant is often the primary source of funding for the Collaborative Applicant to pay for staff and expenses related to the CoC's activities outlined in the [CoC Program Interim Rule](#). The amount is calculated as a percentage of a dollar amount referred to as the Final Pro Rata Need (FPRN), which is discussed in detail in the [Determining the Amount of Available CoC Program Funds](#) resource.

The CoC Planning grant amount is not the same for each Collaborative Applicant in all CoCs. Because the CoC Planning grant is calculated as a percentage, the amount of available funds varies across CoCs. The amount is higher in larger CoCs with many projects and lower in smaller CoCs which have few to no projects.

Each year, HUD publishes the maximum CoC Planning grant amount that each CoC can apply for during the annual competition.

Examples of maximum CoC Planning grant amounts

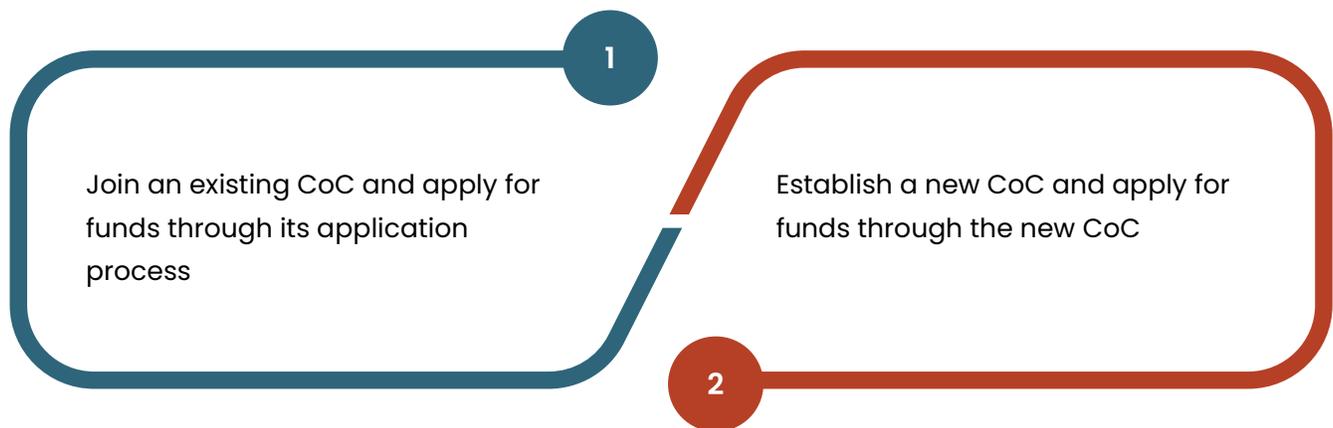
- Alpine, Inyo, Mono Counties CoC – \$3,775
- Boise/Ada County CoC – \$45,297
- St. Petersburg, Clearwater, Largo/Pinellas County CoC – \$159,799
- New Orleans/Jefferson Parish CoC – \$767,817
- Los Angeles City and County CoC – \$1,250,000.

The [Determining the Amount of Available CoC Program Funds](#) resource has more information on funding amounts and includes sample calculations.

Options for Submitting Funding Applications for Individual Projects

Up until now, this resource has described a way you can consider whether to participate in the CoC Program—using a decision-making approach that focuses on roles, activities, and funding. If the CoC Program seems like a program you would like to continue exploring, this section describes the choices you have for applying for funds.

When an organization has not applied for CoC Program funds before, there are two ways to submit an application:



When deciding whether to join an existing CoC or form a new CoC, one aspect to consider is that each CoC Program must have a defined geographic area.

CoC Geographies

Each CoC is responsible for a specific geographic area, and all the projects that receive CoC Program funds operate within that area.

Much of the United States is divided into thousands of location-based jurisdictions called geographic areas; each geographic area has a geographic code. Each code can be assigned only to one CoC, which means that each CoC is unique and cannot share responsibility for another CoC's geographic area. Most geographic codes are already a part of an existing CoC; some are not.

Some Tribal communities have expressed concerns about geographic boundaries limiting who can be served because Tribal citizens may live in wide-ranging locations. While this critical issue is not part of the decision-making approach, it will be addressed later in the series.

Tribal communities can identify their location in relation to existing CoCs using the following resources:

- The [Tribal CoC Intersection](#) map identifies where there is overlap between Tribal lands and Continuum of Care areas.
- The [FY2021 National CoC Boundaries Poster Map](#) depicts each CoC and its boundaries at the county level, as well as areas that are not part of any CoC, although it does not specifically identify Tribal land.
- Each CoC has a contact information page on the HUD Exchange, which includes a “jurisdiction map.” A Tribal community can review the list of CoCs in a state or metropolitan area and review the CoC’s boundaries. Review [Grantee Contact Information - HUD Exchange](#).

Join and Apply for Funding Through an Existing CoC or Form a New CoC

The table on the next page identifies differences between applying for funding through an existing CoC and a new CoC. The comparison draws on the information provided earlier in this resource.

One additional item to consider is HUD’s application scoring process. When a CoC submits an application package to HUD, HUD reviews and scores it. While the scoring criteria may change from year to year, in general, HUD reviews project performance and the effect the CoC’s efforts have had on addressing homelessness in the CoC. New CoCs with limited historical data are unlikely to score high enough to be awarded funds for all the applications and may receive no funding for new projects.

Whichever decision the Tribe/TDHE makes, it is important to note that the process may be developed over the course of several years. Additionally, if a Tribe/TDHE wishes to seek technical assistance to develop partnerships between Tribes and CoCs, as well as developing permanent supportive housing specifically for American Indians and Alaskan Natives (AI/ANs) experiencing homelessness, they can request technical assistance through the [Request Program Assistance - HUD Exchange](#) page.

Existing CoC	New CoC
<p>A CoC Board has developed the necessary policies and procedures that enable it to fulfill its role and meet the CoC Program’s regulatory requirements.</p>	<p>A new CoC needs to establish a CoC Board and develop the governance documents to guide the CoC structure and activities.</p>
<p>A Collaborative Applicant is ready to implement the application submission tasks assigned by the CoC.</p>	<p>A new CoC needs to identify a Collaborative Applicant, which needs to learn how to implement the CoC’s responsibilities for submitting applications.</p>
<p>There is an application solicitation (e.g., RFP), review, and ranking process ready to process the applications for all organizations that intend to apply for funding.</p>	<p>An application process needs to be developed that would include identifying CoC needs, developing priorities, identifying potential applicants, advertising the competition, and developing criteria to select and rank applications.</p>
<p>An existing CoC has information and data to complete the CoC Application.</p>	<p>A new CoC needs time to get the CoC operating with members, committees, etc.; gather data about people in need and available housing and services; monitor projects and assess performance; and more.</p>
<p>Nearly all existing CoCs have an inventory of projects from which there is potential to reallocate funds for a new project.</p>	<p>The total amount of funding a new CoC can apply for is capped by the Preliminary Pro Rata Need ((PPRN), a formula amount), which is the total amount assigned to the new CoC’s geographic area and not likely to be sufficient to support a new project. The Determining the Amount of Available CoC Program Funds resource has more about how HUD distributes PPRN amounts to geographic areas.</p>
<p>For the Collaborative Applicant, the CoC Planning grant amount is likely to be higher than the one for a new CoC because it has either more geographic areas than the new CoC (higher PPRN) or it has an inventory of projects (higher Annual Renewal Demand (ARD)).</p> <p>Note: ARD is the total budget amount for all projects within a CoC that are eligible to submit a project application to renew the project in the upcoming CoC Program competition.</p>	<p>In a new CoC, the Collaborative Applicant’s CoC Planning grant amount is capped at 3% of the PPRN because the CoC does not have an ARD due to the lack of projects.</p>

Next Steps

This resource has described an approach for deciding whether to participate in the CoC Program that considers three aspects—roles, activities, and funding. It has also outlined two options that Tribes and TDHEs might wish to reflect on during the decision-making process—pursuing project funding through an existing CoC or establishing a new CoC. [Attachment: CoC Program At a Glance](#) highlights information covered in this resource and introduces new aspects of the program that are explored in other resources.

When continuing with the other resources in this series, we recommend starting with CoC Program activities to assess whether the CoC Program funds the activities prioritized by Tribes and TDHEs and then moving to the CoC Program roles and potential funding.



Tribes and TDHEs can compare their prioritized activities with what the CoC Program will fund.



Tribes and TDHEs can review the responsibilities of organizations that apply for CoC Program funding as part of any CoC and the responsibilities of a CoC.



Tribes and TDHEs can identify the potential amount of funding available for projects and CoC Planning grants.

Once the resources on CoC Program activities, recipient and CoC roles, and potential CoC Program funding are reviewed, the next resource in the series is the [CoC Program Participation Decision and Assessment](#) resource, which includes questions that lead to decisions about participating in the CoC Program. If a decision is made to participate in the CoC Program, the [Continuing the CoC Program Paths](#) resource identifies the action steps to continue one of two paths—joining an existing CoC or establishing a new CoC.



If you would like to ask a question, please submit your question through the above portal.



If you would like more in-depth assistance about the CoC Program, please request technical assistance through the above portal.



If you would like to connect with HUD staff, contact information is here: [HUD's 10 Field Offices](#) and [HUD's 6 ONAP Area Offices](#)

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Continuum of Care (CoC) Program At a Glance



ELIGIBLE HOMELESS POPULATIONS

HUD defines homelessness as living in a place not meant for human beings to live; going to lose their housing within 14 days; fleeing a domestic or sexual violence situation or are a victim of human trafficking.



ELIGIBLE ACTIVITIES

Providing and operating housing units; program participant rent subsidies; case management, legal support, mental health treatment, life skills training, or similar support services.



REIMBURSEMENT BASED AND MATCH REQUIREMENT

The CoC Program typically uses the reimbursement method to fund eligible costs and requires a 25% match for most projects.



PARTICIPATION OPTIONS

To participate, you can join an existing CoC or establish a new CoC. The [Tribal CoC Intersection](#) map identifies where there is overlap between Tribal lands and CoC areas.



POTENTIAL EXISTING CoC FUNDING

New projects are limited to bonus and reallocation funds. See [Determining Potential Funding](#), as well as the most recent [Fiscal Year CoC Estimated Annual Renewal Demand Report](#).



POTENTIAL TRIBAL FUNDING

Funding amounts may be not adequate to meet the needs of your community. See [Determining Potential Funding](#), as well as the most recent [Fiscal Year CoC Geographic Code Report](#).



LONG-TERM COMMITMENT TO SUBMIT A COMPETITIVE APPLICATION

HUD reviews previous project performance and the effect those efforts have had on addressing homelessness. In addition, new projects are limited to seeking bonus and reallocated funds.



LONG-TERM COMMITMENT TO FORM A CoC

Requires the development of a Continuum of Care system (e.g., Collaborative Applicant, HMIS, and Coordinated Entry System). Assess existing Tribal administrative resources, programs, and services to build upon.



TECHNICAL ASSISTANCE

If you would like in-depth assistance for the CoC Program, please reach out through the [Request Program Assistance - HUD Exchange](#) page.