



*Southwest Tribal  
Housing Alliance*



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# Addressing Homelessness in Indian Country

Evaluating the Mechanics and Practical Value of the Inclusion  
of Tribes in the Continuum of Care Program

Big Water Consulting  
SWTHA Monthly Meeting (April 2022)  
April 12, 2022

# Big Water Consulting

- Founded in 2011 to promote, design and facilitate Tribal data collection and analysis, program evaluation and strategic planning
- Managing Director served as lawyer for Tribes and TDHEs, Regional Manager for Quality Assurance for 2010 Census and technical expert for IHBG Formula Negotiated Rulemaking



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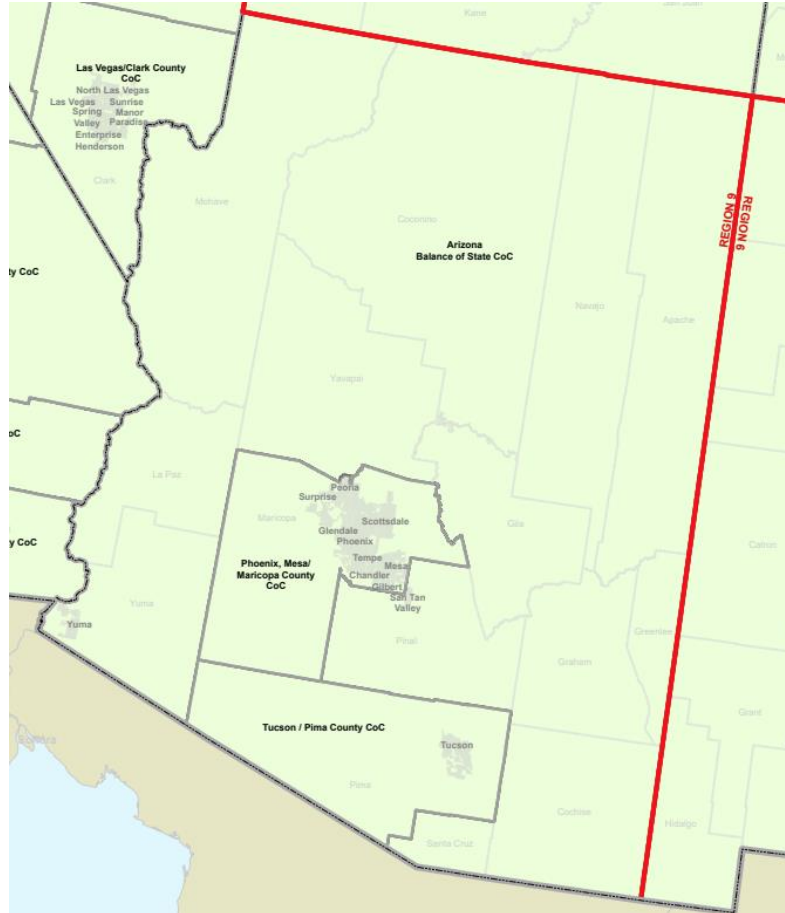
# Homelessness in Indian Country

- Commonly experienced as “doubling up” or “couch surfing” (people provided shelter by others but without a permanent residence of their own)
- HUD definitions of “sheltered” (staying in a designated shelter facility or space operated/paid for by a shelter provider) and “unsheltered” (living outdoors or in a place not meant for sleeping/human habitation, including those with incomplete facilities) homeless exclude those who are doubled up or couch surfing
- Tribes are beginning to operate more shelters serving a more varied population than before
- Unsheltered people do exist in Indian Country and need to be acknowledged and counted (e.g., most residents of reservations know of at least a handful of people who live in their cars, tents, sheds or abandoned homes that are open to the elements and/or don’t have heat or water)

# What is a Continuum of Care (CoC)?

- The Continuum of Care Program is a HUD Program that is designed to assist individuals and families experiencing homelessness in accessing stable housing and receiving the services that they need.
- Each year, HUD awards funding to state and local governments as well as non-profit organizations to re-house homeless individuals and families, promote access to services, and encourage self-sufficiency.
- After HUD awards funding to government and non-profit organizations (called “recipients”), the recipients may contract with direct service providers, such as shelter operators (called “subrecipients”)

# What is a Continuum of Care (CoC)?



- States are organized into distinct Continuums of Care, usually following county boundaries.
- Arizona has three CoCs:
  - Phoenix, Mesa/Maricopa County
  - Tucson, Pima County
  - Balance of State
- Many Tribal areas are located in the “Balance of State CoC”, representing most non-metro areas.

[HUD Map of Tribal/CoC Intersection](#)

# History of CoC and PIT

- The majority of tribes have not participated in the annual PIT Count (as demonstrated by the numbers representing counties in which tribal lands are present and by the statements made by state and local count coordinators)
- In many cases, states do not require local count coordinators to include Tribes and tribal lands, and a cursory outreach effort (e.g., a Dear Tribal Leader letter) is made to get permission to conduct the count on tribal lands or partner with a tribal program that will conduct the count as part of the larger count
- Tribes have not been incentivized to participate in the count because they were not eligible to receive Continuum of Care funding (so their numbers could/would be used to fund another organization that may or may not serve their homeless members)

# Recent Legislative Changes and HUD Consultations

- The Consolidated Appropriations Act was passed in 2020 that enabled Tribes to participate in the Continuum of Care program
- HUD has held 3 consultations with Tribes and with Continuum of Care organizations and non-Native homelessness service providers to discuss implementation of the Act's provisions (links)
  - [March 1, 2021](#)
  - [May 13, 2021](#)
  - [December 17, 2021](#)

# Timeline of Activities following Legislative and Administrative Changes

- In the first year (2021), Tribes were eligible to submit plans to existing Continuum of Care providers to provide homelessness services in their areas
- In subsequent years (2022-), Tribes are fully eligible to participate in the CoC program
  - Tribes can claim their own lands and create a dedicated CoC,
  - Authorize (via Tribal resolution) an existing non-Tribal CoC to serve, and receive funding to provide services, within their lands, **OR**
  - Apply alongside an existing CoC as a Collaborative Applicant
- The deadline to submit for CoC Program Registration for FY 2022 was April 7, 2022, but Tribes/TDHEs are eligible to request funds through existing CoCs as subrecipients (as in 2021).



# Opportunities and Challenges for Collaboration between Existing CoCs and Tribes

- Funding for the Continuum of Care program has always been insufficient to meet the needs of the populations served by existing CoCs (thus, the addition of a potentially large new population will inevitably stretch those dollars even further)
- Apartments/multi-family housing are a significant tool in getting people experiencing homelessness permanently housed and very few apartments (or even long-term shelters) exist on reservations
- Properly counting the number of people experiencing homelessness on reservations will require a different form of official measurement/counting that takes into account the predominant manifestation of homelessness in Indian Country (multiple families living in a single housing unit due to a lack of affordable housing within tribal lands)
- Permanent programs providing rental assistance to families without a permanent residence of their own may serve as a catalyst for new housing development in Indian Country (e.g., rental assistance funding provided through Tribal HUD-VASH has been used as a basis for successful tribal LIHTC applications to construct new housing to serve tribal veterans)

# Outreach by AZ Balance of State Continuum of Care

- Unique opportunity to directly facilitate Tribal cooperation in PIT Count and discuss practical mechanics of Tribal participation in Continuum of Care program
- Important in part because many Tribes expressed concern about how to engage with existing CoCs (that had not traditionally wanted to work with them)
- Workshops/roundtable discussions could flesh out and begin to resolve hurdles to effective Tribal participation in CoC program and provision of vital services to residents experiencing homelessness (i.e., identify workable near-term local solutions, long-term strategies for building capacity and opportunities to collaborate within the network of providers to better serve tribal members wherever they are located)
- Opportunity to accurately quantify (for the first time) the level of homelessness throughout the state within and outside of tribal lands for purposes of determining the level of services and amount of housing required and to advocate for an increase in overall CoC funding to meet the true level of need in AZ and other states throughout the country

# Thank You!



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