

The 2022 Continuum of Care (CoC) Supplemental Notice of Funding Opportunity (NOFO) to Address Unsheltered and Rural Homelessness (FR-6500-N-25S) was released on June 22, 2022. This NOFO makes \$322 million available to assist communities in addressing unsheltered and rural homelessness.

The U.S. Department of Housing & Urban Development (HUD) prioritizes equity in this Special NOFO. CoCs are incentivized to assess their homelessness programs and systems for racial disparities in services and outcomes, identify barriers to underserved groups, and to develop action plans, if inequities are found. The NOFO also emphasizes the inclusion of people with lived experience in the CoC process, particularly groups that are disproportionately impacted by homelessness. Regardless of whether a CoC intends to apply for the funds to address unsheltered homelessness, rural homelessness, or both, centering equity will be fundamental to crafting a competitive application.

Why Equity Matters

Most minority groups are overrepresented in the homelessness system and generally experience homelessness at higher rates than White people. African Americans are the most glaringly disproportionate group, representing about 40 percent of people experiencing homelessness but are only 13 percent of the general population of the United States.

Understanding the causes of racial/ethnic disproportionality in homelessness requires an analysis of centuries of systemic racial discrimination. Government sponsored and sanctioned discriminatory policies and practices like Jim Crow laws, redlining, and exclusionary zoning laws, to name a few, have all had racialized consequences that continue to drive inequities today, including in homelessness. Overrepresentation also threads through various communities such as the LGBTQ+, also rooted in discrimination.

Structural factors and feeder systems such as criminal justice account largely for the disproportionality in homelessness, however, homelessness programs and systems may also create disparities in services and the outcomes. Homelessness systems and programs have a direct responsibility to ensure that they are not adding to the problem by having a disparate impact on people based on race or ethnicity. The special NOFO places an emphasis on strategies that address the needs of overrepresented or underserved groups.

Addressing Equity

As you begin to review Section VII - Application Review Information, think about how your CoC can center equity in the work to address unsheltered and rural homelessness. There are points to be gained from this type of assessment.

The special NOFO awards points for activities like inclusion, the diversity of stakeholders, the engagement of organizations that serve culturally specific communities experiencing homelessness. More examples include points for outreach strategies that are culturally appropriate and that involve people with lived experience as paid staff. CoCs can get up to **5 points** for including people with lived experience in the CoC process (p. 52) and up to **8 points** for supporting underserved populations (p.53).

Tribal Lands

Although the population of Indigenous people experiencing homelessness is comparatively smaller than others, their rates of homelessness demonstrate a shocking overrepresentation compared to the U.S. population. American Indian, Alaska Native, Pacific Islander and Native Hawaiian people account for one percent of the U.S. population, but five percent of the homeless population and seven percent of the unsheltered population.

For these reasons, the special NOFO prioritizes Tribal lands. The NOFO provides additional incentives for creating projects that are located on Trust Lands and Reservations that have high levels of homelessness, particularly in areas where CoC services have not been available. CoCs can for example receive up to **10 points** for serving structurally disadvantaged areas.

Conclusion

Any effort to end homelessness must involve the active disruption of patterns of inequalities. CoCs must lead with a deep analysis of how race/ethnicity intersects with homelessness and develop solutions to address disparities. This is not the first time HUD has addressed racial disparities and inclusion in a NOFO. This is another reminder of the importance of centering equity in this work - underserved communities are counting on it.