# FY 2026

# IN-503 - Indianapolis CoC

# Continuum of Care

# 3A-DP. CoC Policy or Statement to Advance Recovery

**Documents include the following:**

- Indianapolis CoC Supportive Service Policy

# Indianapolis Continuum of Care (CoC)

# Policy on Prohibition of Illicit Drug Enablement and Advancement of Recovery

## I. Purpose

The purpose of this policy is to establish clear standards for all projects funded through or submitted by the Indianapolis Continuum of Care (CoC) to ensure compliance with federal requirements, promote safe and lawful housing environments, and support pathways to recovery for individuals experiencing homelessness.

## II. Definition of the Continuum of Care

The Indianapolis Continuum of Care (CoC) is a community-wide planning body responsible for coordinating housing and services funding for individuals and families experiencing homelessness across Indianapolis. The CoC promotes a comprehensive and strategic approach to ending homelessness through system coordination, resource alignment, data-driven decision-making, and adherence to federal regulations established by the U.S. Department of Housing and Urban Development (HUD).

The CoC includes nonprofit organizations, local governments, housing providers, healthcare partners, and other stakeholders who collaborate to design, fund, and implement programs that address homelessness, improve health outcomes, and support long-term housing stability.

## III. Policy Statement

The Indianapolis CoC affirms its commitment to operating all CoC-funded housing programs in compliance with federal law, including but not limited to 2 CFR 200.300(a), 21 U.S.C. §§ 856 and 863, and 24 CFR 578.

All project applicants must certify that:

- They will not engage in illegal racial discrimination.

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- They will not operate drug injection sites or "safe consumption sites" in violation of federal law (21 U.S.C. 856(a)(1)).
- They will not knowingly permit the use or distribution of illicit drugs on property under their control in violation of 21 U.S.C. 856(a)(2).
- They will not knowingly distribute drug paraphernalia in violation of 21 U.S.C. 863.

The CoC further affirms that these prohibitions **do not require**:

- Program participants to be sober to receive assistance;
- Participation in substance use treatment as a condition of assistance; or
- Eviction or program exit for a first-time violation of a drug-related policy or lease provision.

This approach is consistent regulations under 24 CFR 578.

# IV. Prohibition on Illicit Drug Enablement

In accordance with federal law and CoC policy, all CoC-funded housing projects are strictly prohibited from engaging in activities that enable the unlawful use of controlled substances.

## A. Prohibited Activities

CoC-funded housing projects shall not:

1. Operate drug injection sites or "safe consumption sites";
2. Knowingly permit the use or distribution of illicit drugs on property under their ownership, lease, or control;
3. Conduct, permit, encourage, or allow any such activities under the pretext of "harm reduction"; or
4. Knowingly distribute drug paraphernalia, either on-site or off-site, in violation of federal law.

## B. Definition of Drug Paraphernalia

For purposes of this policy, **"drug paraphernalia"** is defined in accordance with 21 U.S.C. § 863 as:

Any equipment, product, or material of any kind that is primarily intended or designed for use in manufacturing, compounding, converting, concealing, producing, processing, preparing, injecting, ingesting, inhaling, or otherwise introducing a controlled substance into the human body in violation of federal law.

This includes, but is not limited to, items such as pipes, water pipes, bongs, carburetion devices, smoking masks, roach clips, miniature spoons, and similar items primarily intended for drug use.

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Determinations of whether an item constitutes drug paraphernalia shall be based on its intended or designed use, including relevant contextual factors such as how the item is marketed, distributed, or used in practice.

### C. Clarifying Statement

Nothing in this section is intended to:

- Require program participants to maintain sobriety as a condition of assistance;
- Require participation in substance use treatment as a condition of assistance; or
- Require eviction or termination of assistance for a first-time violation of a drug-related program rule or lease provision.

Projects may establish their own program requirements, including recovery-based models, in accordance with 24 CFR 578.

## V. Remedies for Non-Compliance

The CoC will take appropriate and proportionate action if a funded project is found to be in violation of this policy. Potential remedies include:

- **Corrective Action Plans (CAPs):** Required remediation steps with defined timelines;
- **Increased Monitoring:** Enhanced program oversight, including site visits and documentation review;
- **Technical Assistance:** Targeted support to achieve compliance;
- **Conditional Funding Status:** Restrictions placed on current or future funding eligibility;
- **Reallocation or Non-Renewal:** Removal or redistribution of CoC funds for continued or serious violations;

All enforcement actions will follow established CoC governance and monitoring procedures and ensure due process.

## VI. Encouragement of Treatment and Recovery Supports

The Indianapolis CoC strongly encourages all funded projects to:

- Connect participants to **evidence-based substance use disorder (SUD) treatment**, including medication-assisted treatment (MAT);
- Partner with providers offering **behavioral health, recovery support services, and peer support**;

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- Facilitate access to **recovery housing options** both within and outside of the CoC network;
- Integrate trauma-informed, culturally responsive approaches that support long-term recovery and stability.

The CoC recognizes that recovery is individualized and supports a range of pathways aligned with participant choice and clinical need.

# VII. Project Design Flexibility

Nothing in this policy restricts or prohibits CoC-funded housing projects from:

- Requiring program participants to maintain sobriety; or
- Requiring participation in substance use treatment as a condition of assistance,

**provided such requirements are implemented in accordance with 24 CFR 578 and other applicable laws.**

This policy preserves a diverse range of program models, including Housing First and recovery-focused housing, while maintaining compliance with federal law.

# VIII. Implementation and Certification

All project applicants must affirm compliance with this policy through required certification language in the CoC application process. The CoC will review submissions to ensure alignment with this policy prior to ranking and submission to HUD.

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# Advancing Recovery by Prohibiting Illicit Drug Enablement – Indianapolis CoC Narrative

The Indianapolis Continuum of Care (CoC) maintains a formal policy applicable to all CoC-funded and CoC-submitted housing projects that ensures compliance with federal law while promoting pathways to recovery and housing stability.

**Policy Prohibition (Requirement 1):**
All CoC-funded housing projects are explicitly prohibited from operating drug injection sites or "safe consumption sites," knowingly distributing drug paraphernalia on or off property under their control, or knowingly permitting the use or distribution of illicit drugs on property they own, lease, or manage. The policy further prohibits any project from conducting, permitting, encouraging, or allowing these activities under the pretext of "harm reduction." This prohibition aligns with 21 U.S.C. §§ 856 and 863 and is reinforced through required applicant certifications pursuant to 2 CFR 200.300(a).

**Remedies and Enforcement (Requirement 2):**
The CoC has established a graduated enforcement framework to ensure compliance. Projects found in violation of this policy may be subject to corrective action plans with defined timelines, increased monitoring and oversight (including site visits and documentation review), and targeted technical assistance. Continued or serious non-compliance may result in conditional funding status, non-renewal of project funding, or reallocation to other providers, consistent with CoC governance and monitoring procedures. These remedies ensure accountability while providing a pathway to regain compliance.

**Encouragement of Treatment and Recovery (Requirement 3):**
While prohibiting illicit drug enablement, the Indianapolis CoC strongly encourages all projects to actively connect participants to evidence-based substance use disorder treatment, including medication-assisted treatment (MAT), behavioral health services, peer recovery supports, and recovery housing options within and outside the CoC. The CoC promotes trauma-informed, culturally responsive approaches and recognizes multiple pathways to recovery, emphasizing voluntary engagement and participant-centered care.

**Project Design Flexibility (Requirement 4):**
This policy does not impose sobriety or treatment participation requirements as a condition of assistance. Consistent with 24 CFR 578, projects may utilize a variety of program models, including those that require sobriety or treatment participation. Additionally, this policy does not require eviction or program exit for a first-time violation of a drug-related lease or program policy, allowing providers to respond proportionately and maintain housing stability whenever possible.

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**Certification Alignment:**
All project applicants are required to formally certify adherence to these standards as part of the CoC application process, including affirmations that they will not engage in illegal racial discrimination and will comply with all applicable federal statutes related to illicit drug activity. Applications are reviewed for consistency with this policy prior to ranking and submission to HUD.

Through this clear, enforceable policy framework, the Indianapolis CoC ensures legal compliance, strengthens program accountability, and advances recovery-oriented, housing-focused solutions to homelessness.

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