



## HHAP-5 FAQ

### Batch 1: Posted 11/27/23

#### Application and contracting timelines

**Q 1:** Will it be rolling awards during the 6-month HHAP-5 application period?

**A:** No, there will not be rolling awards made for HHAP-5. The application includes a Regionally Coordinated Homelessness Action Plan and a requirement for three stakeholder meetings. Cal ICH anticipates that applicants will likely need those full 6 months to complete these processes. While Cal ICH will be available to support grantees with questions during the application process, we will not be reviewing and approving applications on a rolling basis. There is no need to submit applications before the 5:00 p.m. March 27, 2024, deadline.

**Q 2:** Will applications submitted earlier in the application window be reviewed sooner and contract execution be sooner?

**A:** No. All the applications will be reviewed after the submission deadline of March 27, 2024.

**Q 3:** With the now longer 6-month application window and due date of March 27, 2024, does Cal ICH have an anticipated timeline for when contracts would be executed?

**A:** Cal ICH will have the same general 90-day review period from previous rounds of HHAP, so we are anticipating announcing awards and getting contract packages out to grantees in or around July of 2024.

**Q 4:** When can we anticipate receiving additional guidance on the requirements for the HHAP-5 remainder Disbursement (2nd 50% of the HHAP-5 base allocation)?

**A:** That process does not take place until 2026. Guidance will be provided by HCD in FY 2024-25.

**Q 5:** When will supporting documents for the HHAP-5 application be released?

**A:** The following resources are published on our website as of 10.20.23: HHAP-5 NOFA, HHAP-5 Application Portal, HHAP-5 Application Template, the HHAP-5 NOFA walkthrough presentation slides, and the HHAP-5 NOFA walkthrough recording. This FAQ is now available. The following resources will be published in the coming weeks: the HHAP rounds 1-5 side-by-side document and MOU guidance.

## **Region**

**Q 6:** How will "region" be defined for the Regionally Coordinated Homelessness Action Plan?

**A:** Pursuant to HSC section 50230, regions are defined in HHAP-5 based on counties and include any large cities and CoCs within the county. For example, in Los Angeles County, all large cities and CoCs within LA County are considered one region and will have to submit one Regionally Coordinated Homelessness Action Plan. For areas that have multiple counties within one CoC, each county could submit separate applications each in collaboration with the CoC; however, we strongly encourage those regions to submit one application and Regionally Coordinated Homelessness Action Plan.

**Q 7:** Who must apply together and how does that impact contracting?

**A:** All applicants within a region (as defined above) must apply together. Since the regions are defined by county geography, it is the County and any large cities and CoCs therein. While these entities must apply together (i.e., submit a single application with a single Regionally Coordinated Homelessness Action Plan), eligible applicants **do not** have to receive their funds together. All eligible applicants may elect to receive their allocation directly or designate another eligible applicant in the region as the Administrative Entity for their HHAP-5 allocation.

Questions **7A – 7H** below further illustrate HHAP-5 regions:

**Q7.A:** If our single county CoC does not include any of the 14 big cities, are the participating jurisdictions for our purposes just the County and the CoC?

**A:** Yes, that is correct.

**Q7.B:** If one County contains one CoC and one Large City, would all three of these entities apply under one application?

**A:** Yes.

**Q 7.C:** If counties are served by a multi-county CoC, does that mean they only need one plan amongst all the counties served by the multi-county CoC?

**A:** Cal ICH encourages counties served by the same CoC to apply together as a CoC region. However, per the statutory definition of “region”, counties are only required to apply with their overlapping CoC and large cities. In the instance where counties served by a single CoC elect to apply separately, the CoC would need to participate in each county’s application in order for the application to meet the statutory requirements.

**Q 7.D:** If counties in a multi-county CoC collaborate with the CoC and submit one application, can each county still contract individually with the State to receive and administer their allocation directly?

**A:** Yes.

**Q 7.E:** If eligible applicants within a region want to administer funds separately, do they need to submit separate applications?

**A:** Cal ICH will not accept separate applications. Cal ICH will only accept a single regional application and Regionally Coordinated Homelessness Action Plan from each region. In the first section of the application, each applicant will have an opportunity to indicate that they will enter into contract with the state to receive and administer their HHAP-5 allocation individually.

**Q 7.F:** Are eligible applicants required to receive funds separately?

**A:** No. The eligible applicants participating in an application will have the opportunity to indicate whether they plan to receive and administer their HHAP-5 allocation **or** designate an eligible applicant in their region to serve as their Administrative Entity.

**Q 7.G:** If there are three eligible applicants in a region receiving disbursements, can there be one joint Administrative Entity (AE), plus one individual entity (e.g. joint AE for County and CoC, plus a separate disbursement to a City)?

**A:** Yes.

**Q 7.H:** Is there a “lead applicant”?

**A:** No. All eligible applicants in the region are expected to participate fully and will be asked to certify to contents of the application and Regionally

Coordinated Homelessness Action Plan. Cal ICH created the [application template](#) so that applicants may work together on the application outside of the Cognito application portal. Applicants are responsible for inputting the information into the Cognito application portal and submitting before 5:00 pm on March 27, 2024.

**Q 8:** Are CoCs still eligible to apply for HHAP-5?

**A:** Yes, the eligible applicants for HHAP-5 are the same as for HHAP-4, but there is a new requirement for regional applications. All CoCs must apply in collaboration with the county or counties that it serves.

### **Eligible population/prevention**

**Q 9:** The NOFA says, "Requires prioritization of households with incomes at or below 30% of the area median income, who pay more than 50% of their income in housing costs, and who meet criteria for being at highest risk of homelessness through data-informed criteria." Does this mean HMIS data? Will there be further guidance on how to determine who falls into this category?

**A:** For previous rounds of HHAP, eligible populations were limited to individuals that met the federal definition of homeless, which includes people at "imminent risk of homelessness." One of the requirements to be considered at "imminent risk" is that the person will lose their housing within 14 days. HHAP-5 changes the eligible population to include people who may not have proof that they will lose their housing in 14 days but are otherwise determined to be at risk of homelessness. Grantees are being asked to prioritize prevention services to households that (1) are below 30% of the AMI; (2) pay more than 50% of their income in housing costs; and (3) meet criteria for being at highest risk of homelessness through a data-informed criteria. Cal ICH is welcoming local jurisdictions to provide their data-informed sources used to prioritize those at highest risk of falling into homelessness.

### **Eligible uses**

**Q 10:** Is the 1% HMIS allocation part of the regular allocation or in addition to it?

**A:** The 1% allocation for HMIS related expenses is part of the HHAP-5 base allocation, not in addition to it. The eligible use category is intended to provide some baseline level of support for HMIS agencies and ensure proper operation of the HMIS system. This is particularly important because of the additional requirements HMIS agencies are being asked to meet.

**Q 11:** The NOFA says that regional planning and work on the application process are eligible under the Systems Support eligible use category. Would those be considered "pre-award" costs, and does Cal ICH have any guidance about how grantees should track these expenses prior to award?

**A:** Generally, grantees may use prior rounds of HHAP funding to support the HHAP-5 application process. These costs would be categorized under Systems Support and would not be considered "pre-award costs". Additionally, 1 (one) percent (\$9.5 million) of the \$1 billion HHAP-5 allocation is set aside for planning allocations that may be used to support the regional application process. These funds are available to Eligible Applicants as a retroactive reimbursement upon approval of the Regionally Coordinated Homelessness Action Plan and HHAP-5 application. Allowable costs are reimbursable back to the date of NOFA publish (9/29/2023) OR as an advance for eligible applicants that do not have any available funds to cover the planning period. These funds would need to be tracked and monitored at the local level, no different than any other HHAP expenditures. If an applicant does not require funds for the application process, these planning funds will still be included in the grantee's HHAP-5 allocation for use on any other HHAP-5 eligible activity.

**Q 12:** What kind of costs would be eligible under the 1% allocation for regional planning?

**A:** Costs accrued in the process of working with regional partners to complete the HHAP-5 application and Regionally Coordinated Homelessness Action Plan would be allowable here.

**Q 13:** The NOFA says, "The restriction on interim housing solutions does not apply to the 10% youth set-aside" Does this mean that we can fund new interim housing programs for youth as long as we are within the 10% youth set aside without prior approval from Cal ICH?

**A:** Yes, that is correct.

**Q 14:** How will the exemption on Interim Housing for youth be operationalized? Could a jurisdiction fund a new Interim Housing solution for youth within their 10% set aside and then use funds above the 10% towards prevention services for youth and not be subject to the financial and policy actions requirements?

**A:** Yes. Grantees can spend up to 10% of their total allocation on new interim housing for youth and they would not need prior approval from Cal ICH. Any additional dollars spent on new interim housing over the 10% youth set aside,

(either for youth or non-youth) would need to demonstrate sufficient resources towards permanent housing and receive prior approval from Cal ICH.

**Q 15:** If a jurisdiction intends to fund new Interim Housing solutions for youth above 10% of their total HHAP-5 dollars, can the jurisdiction demonstrate that they have met the sufficient resources requirement by demonstrating that they have enough long-term permanent housing solutions just for youth?

**A:** No. If a grantee spends any dollars on new interim housing outside of the 10% youth set aside, they must demonstrate that **their region** has spent sufficient resources towards permanent housing in their total homelessness services system.

**Q 16:** Funds going to affordable housing developers for permanent housing such as predevelopment, development, and operating subsidies, etc. -- can these be loans OR grants? Or are they required to be one or the other?

**A:** These are grants.

**Q 17:** Will the two new Operating Subsidy sub-categories for Permanent Housing and Interim Housing also be separated and broken out in the reporting?

**A:** Yes.

**Q 18:** Where the NOFA calls out that no new interim housing solutions can be funded unless certain requirements are met, can you confirm what “new” is considered? Is that newly HHAP funded, or newly opened/built in the community? For example, if it was funded under HEAP or HHAP Round 1 but operating subsidies are needed beginning in 2024-25.

**A:** Here, “new” means not yet in existence. This definition is not determined based on whether an interim housing site has previously received HHAP funding. The example above would not be considered new interim housing.

**Q 19:** Can Cal-ICH clarify that the Administrative Costs limitations are only applicable to the Administrative Entity (AE) that is managing the HHAP-5 funds for the county, city, and/or CoC, and the administrative costs cap does not extend to nonprofits that are contracted with to deliver housing or services?

**A:** That is correct.

### **Regionally Coordinated Homelessness Action Plan**

**Q 20:** Will there be a template for the Regionally Coordinated Homelessness Action Plan?

**A:** The Regionally Coordinated Homelessness Action Plan is embedded in the application; therefore, it is included in the [application template](#) posted on the Cal ICH website.

**Q 21:** Is the Regionally Coordinated Homelessness Action Plan due to Cal ICH to be approved prior to March 27, 2024? If so, what is the deadline?

**A:** No, the Regionally Coordinated Homelessness Action Plan should be submitted as part of the application which is due on March 27, 2024.

**Q 22:** What is the deadline for posting the Regionally Coordinated Homelessness Action Plan on our website?

**A:** The council and recipients shall both post final round 5 program applications to their respective internet websites within 30 days of disbursement to the applicant. Additionally, participating applicants are required to publish the proposed, approved, and amended versions of their Regionally Coordinated Homelessness Action Plan on their websites.

**Q 23:** The NOFA states “The Regionally Coordinated Homelessness Action Plan must describe key actions the region will take to ensure racial and gender equity...” Should this be referring to “ethnic equity” rather than “gender equity”? System Performance Measures asks only for racial/ethnic disparities, not gender.

**A:** These are referring to two distinct parts of the application. For each system performance measure, applicants are asked to identify racial or ethnic disparities and corresponding actions to improve these measures. Applicants may include other overrepresented/underserved populations here as well. The application also includes an equity improvement plan where applicants are asked to identify key actions the region will take to ensure both racial and gender equity in service delivery, housing placements, and housing retention.

**Q 24:** For the Regionally Coordinated Homelessness Action Plan requirement, would an update to the HHAP-3 Local Homeless Action Plan meet the requirement? Are there additional details that can be provided about what will be required to be included in the plan if a new plan is needed?

**A:** While there are similarities, statute is very prescriptive about what is required in this application. The system performance measures are the same from previous rounds, and the actions listed previously to improve those metrics could be the same. Additionally, the section that asks for the total amount of available funding in the region is similar to what was asked for in previous rounds. While we want to keep as consistent as possible to prior rounds, there are statutory



requirements that lead to distinct differences. The [application template](#) provides additional guidance (including minimum requirements) for each section of the Regionally Coordinated Homelessness Action Plan.

**Q 25:** Is there any documentation that must be submitted to show proof of the three required public meetings?

**A:** The application requires applicants to provide the dates the meetings were held, to describe how stakeholders were invited and encouraged to participate, and to certify that this process was followed. We recommend grantees retain documentation of those meetings in alignment with Cal ICH's record retention policy (See Section VIII.E.3 of the NOFA).

**Q 26:** What is the timeframe for the Regionally Coordinated Homelessness Action Plan? If we have one already developed covering 2023-2026 is this acceptable?

**A:** The Regionally Coordinated Homelessness Action Plan must follow specific statutory requirements. We recommend looking at what you have and looking at what is required as described in the NOFA. It's possible that all or most of the information you need for this application is already embedded in your existing action plan. In that case, Cal ICH encourages applicants to use and build upon prior work to complete the HHAP-5 application. However, applicants may not submit a separate document in place of this HHAP-5 application. Applicants must complete and submit the application in the Cognito portal in the form and manner provided by Cal ICH.

## **MOU**

**Q 27:** Will there be a template for the MOU?

**A:** Cal ICH recognizes that there are often specific local processes, requirements, or relationships that may affect the terms of an MOU. Cal ICH will provide guidance on what is required in the MOU but will not be providing a template with outlined terms.

**Q 28:** Can you provide guidance around what it means for the Regionally Coordinated Homelessness Action Plan to be reflected in the MOU? Is it "in its entirety" or specific highlights?

**A:** The MOU must be signed by each participating applicant in the region. The MOU shall commit all signatories to participate in and comply with the actions, roles, and responsibilities described in Regionally Coordinated Homelessness



Action Plan. Cal ICH recommends summarizing these roles, responsibilities, and actions in the MOU. Applicants may also choose to attach the complete Regionally Coordinated Action Plan as an addendum to the MOU.

**Q 29:** Since our CoC is not a legal entity, who would sign the jurisdictional MOU on behalf of the CoC that is required for HHAP 5?

**A:** Cal ICH recommends that applicants refer to their CoC charter for guidance on the appropriate party to sign on behalf of the CoC.

### **Budgets/PIT Count**

**Q 30:** Which PIT count will be referenced and used to determine the HHAP-5 allocations? 2022 or 2023?

**A:** Statute requires that we use the most recently available PIT count to determine allocations. HHAP-5 applications aren't due until the end of March 2024, and we expect the final 2023 PIT count to be released in December 2023; therefore, we will be using the 2023 PIT count to determine allocations.

**Q 31:** Since the 2023 PIT numbers aren't published yet, should we anticipate submitting an application with percentages in the budget again instead of actual dollar amounts?

**A:** We expect the final 2023 PIT numbers to be published by HUD by the end of 2023, and we anticipate releasing the final HHAP-5 base allocation amounts no later than the end of January 2024. Since applications aren't due until the end of March, applicants will have two months to complete their proposed budgets based on their final allocation amounts prior to submitting their final application. In the meantime, for planning purposes, we encourage applicants to either use percentages or their HHAP-4 allocations as an estimate of their HHAP-5 allocation.

**Q 32:** We had a reduction in homelessness in our 2023 PIT Count. Does that mean our HHAP-5 allocation will decrease as well?

**A:** Fluctuations in PIT numbers would not necessarily tell you how it will impact your HHAP allocation because the allocation is based on how your PIT compares to every other jurisdiction's PIT across the state. We recommend using your HHAP-4 allocation as the best estimate available until we publish the final HHAP-5 allocations once the final 2023 PIT counts have been released.

**Q 33:** Can you address how the calculation will be made for CoC's that did not conduct a 2023 unsheltered PIT? Will 2022 be used?

**A:** The most recent PIT will be used.

**Q34:** If County, City and CoC applicants are receiving funds separately, do needs have to be prioritized together? Or can each applicant prioritize the needs that will be funded?

**A:** The purpose of HHAP-5 is to organize and deploy the full array of homelessness programs and resources comprehensively and effectively, and sustain existing federal, state, and local investments towards long-term sustainability of housing and supportive services. To accomplish these goals, HHAP-5 requires applicants to create and implement a Regionally Coordinated Homelessness Action Plan. To this end, HHAP- 5 budgets should (1) reflect the state's priorities for funding, (2) reflect the roles, responsibilities and actions outlined in the Regionally Coordinated Homelessness Action Plan to best support the needs of the region. Applicants will have opportunities to explain these connections and their proposed use of HHAP-5 funds in the budget template.

### **Set asides/supplemental/bonus funds**

**Q 35:** Are previous round's bonus funding being reallocated to HHAP-5?

**A:** Yes. \$180 million was set aside from both HHAP-3 and HHAP-4 as bonus funding; this \$360 million has been reallocated as HHAP-5 supplemental funding. \$100 million of this money was made available through the HHAP-5 NOFA and the remaining \$260 million will be made available through a separate application to be released in 2024.

**Q 36:** When will the HHAP-5 application be released for the supplemental funding?

**A:** The first \$100 million of the supplemental funding will be disbursed along with the initial HHAP-5 disbursement. The application for the remaining \$260 million in supplemental funding will be released no later than November 1, 2024. Per statute, to be eligible for this funding a city, county or CoC must have an approved Regionally Coordinated Homelessness Action Plan and a city or county must also demonstrate that it has a compliant housing element.

**Q 37:** I have a question specific to the Supplemental Homekey set-aside in HHAP-5. It's my understanding that the set-aside is for existing Project Homekey sites, and thus the county/CoC breakdown of allocations wouldn't be relevant.

Is there no estimate or guidance specifically for the Project Homekey set-aside in HHAP 5?

**A:** There will be \$161.5 million set aside for HHAP-5-eligible City and County applicants for Supplemental Homekey funding in Fiscal Year (FY) 24-25. These funds will be made available through a separate NOFA, to be released no later than July 1, 2024.

**Q 38:** Is the \$360 million from HHAP-3 and 4 part of the one billion HHAP-5 allocation or is this in addition to?

**A:** The \$360 million from HHAP-3 and 4 is an addition to the one billion HHAP-5 allocation and is being awarded as HHAP-5 supplemental payments. See questions 35 and 36 above.

**Q 39:** So HMIS is an eligible use of HHAP funds, but it still isn't being made mandatory by Cal ICH that each applicant fund the HMIS administrator?

**A:** Correct. The 1% for HMIS is not mandatory; however, it is strongly recommended. CoC's HMIS funding situation are different across the state. Some HMIS administrative entities do require payment when they are adding programs and projects to their system and others do not. We encourage you to communicate with your HMIS lead directly and see if they're struggling with capacity to add more projects. Ultimately, HMIS is critical to remaining in compliance with a number of grants, so additional funding support to ensure a functioning local HMIS is highly encouraged and will benefit the entire region.

**Q 40:** Will the Remaining Supplemental Funding Allocation be a competitive NOFA process? Or will an allocation be available to all those who are eligible and apply?

**A:** The \$260 million remaining supplemental funding allocation will be available to all eligible HHAP-5 applicants. Per HSC section 50238, we will use the same allocation methodology for the supplemental payments as is used to calculate the HHAP-5 base allocations. The application for this funding will be released by November 1, 2024. The contents of the application will be determined after Cal ICH's transition to HCD. (Please note, the Homekey supplemental allocation is from a different pot of money. Homekey supplemental allocation will be a competitive application and will entail different requirements, to be released in the Notice of Funding Availability by July 1, 2024.)

**Q 41.** Could the 1% planning allocation be used to hire someone to complete the application and Regionally Coordinated Homelessness Action Plan on our

behalf? Or could this money be used by the city, county, and CoC to bill staff time who will need to be dedicated to this application.

**A:** Yes, the planning allocation can be used to pay for internal staff time who are working on this application or to hire a contractor to support these efforts.

**Q 42:** Are regions supposed to use the same planning allocation appropriated this year to update their Regionally Coordinated Action Plans for the second disbursement in 2026?

**A:** The planning allocation is meant to support the initial creation of the Regionally Coordinated Homelessness Action Plan. Any funds not used will be considered part of the HHAP-5 base allocation. If needed, system support dollars from any round of HHAP can be used to help support your efforts in updating the Regionally Coordinated Homelessness Action Plan, but additional funds were not allocated at this time for the revision of this Plan.

### **Technical Assistance**

**Q 43:** Will there be guidance or technical assistance on preparing our Regionally Coordinated Homelessness Action Plan for HHAP-5?

**A:** Cal ICH will provide detailed requirements, explanations, and guidance in the NOFA and will follow up with additional resources to support your efforts (check out the [HHAP Grant Program page](#) on our website for all available resources). We also have technical assistance providers who may be able to help in certain areas when questions come in. Applicants can also use their planning allocation or system support dollars to help support their efforts in completing the Regionally Coordinated Homelessness Action Plan.

### **Baseline Data**

**Q 44:** When do you anticipate releasing the HHAP-5 baseline data?

**A:** Cal ICH emailed updated CoC baseline data to all eligible applicants for use in their HHAP-5 application on November 3, 2023.

**Q 45:** Is the baseline data based on fiscal year or calendar year?

**A:** Calendar year.

### **HCD transition**

**Q 46:** With the HHAP 5 application process being longer than previous rounds and HHAP transitioning to HCD, do you have an estimate for when we would receive contracts for signature once applications are submitted in March 2023?

**A:** Cal ICH/HCD will have the same general 90-day review period from previous rounds of HHAP, so we are anticipating announcing awards and getting contract packages out to grantees in or around July of 2024.

**Q 47:** Will Cal ICH manage the HHAP-5 application submittal or is that anticipated to be transferred to HCD over the next few months?

**A:** Cal ICH will lead the HHAP-5 application review process in partnership with HCD.

**Q 48:** Will a Board resolution be required for HHAP-5 if it is moving to HCD?

**A:** There is currently not a board resolution required for the HHAP application process. Local policies may vary.

**Q 49:** Will the transition of HHAP grant administration from Cal ICH to HCD impact the application process or reporting schedule?

**A:** For the application process, here is what applicants can expect:

- Cal ICH will provide support and guidance to applicants in collaboration with HCD throughout the application window.
- Per statute, the council shall review submitted Regionally Coordinated Homelessness Action Plans in coordination with the Department of Housing and Community Development, the State Department of Health Care Services, and the State Department of Social Services.
- During the 90-day review period, Cal ICH will either notify the applicant that their application was approved or will notify the applicant that amendments are required. If necessary, Cal ICH will request additional amendments beyond the 90-day period prior to approving the application.

For the reporting schedule: We do not anticipate any changes to reporting at this time. Many of the reporting timeframes and requirements are detailed in HHAP statute and won't be subject to change. As with any transition, there may be changes identified down the road. Should this need arise, Cal ICH and HCD will communicate proactively with grantees.

## **Others**

**Q 50:** For racial equity, how is the application reviewed and approved if one entity meets the requirements, but others do not?

**A:** Based on how the application is set up – with all applicants in the region applying together - the application will generally be reviewed holistically and be approved or receive amendment requests jointly. The one exception is the HHAP-5 Funding Plan, which will be reviewed and approved per administrative entity. For example, the system performance measures section of the application is set up to reflect CoC baseline data with actions **the region intends to take to improve each system performance measure** listed underneath each measure. The assumption is that all of the applicants in the region are fulfilling their described roles and responsibilities and working together to improve those measures.

**Q 51:** Who will be responsible for submitting HHAP-5 reports?

**A:** Reporting is determined per contract; therefore, each Administrative Entity that enters into contract with Cal ICH/HCD is responsible for submitting HHAP-5 reports for the allocation(s) they are administering. For example, if each applicant in the region receives and administers their allocation separately then each will have to report separately for their funds.

**Q 52:** What is the definition of sufficient resources for purposes of determining whether we can spend funding for interim housing?

**A:** Cal ICH has provided the guidance regarding “sufficient resources” in the NOFA and application template. The application has specific questions about funding dollars for permanent housing and several policy questions. Cal ICH will be providing additional guidance about how we will be evaluating and scoring the answers to those questions.

## **Batch 2: Posted 12/15/23**

### **Application**

**Q 53:** For Section 2.4 "System Performance Measures and Improvement Plan", can you confirm that we do not need to provide numerical measurements. For example, we do not need to provide a concrete decreased/increased number goal (i.e. Will decrease people accessing services to 100). Do we need to provide a percentage or is it okay as long as we have a way to measure our goal?

**A:** Yes, that is correct - numerical goals are not required for HHAP 5; however, grantees do need to identify how they will measure or quantify the success of their key actions to improve each measure.

**Q 54:** Please clarify what descriptions are being asked for in Section 2.3 "Participating Jurisdictions Roles and Responsibilities" under Outreach and Site Coordination and Coordination of and Connection to Service Delivery.

**A:** Outreach and site coordination seeks to understand how the various parties are coordinating in terms of outreach to people experiencing unsheltered homelessness or living in encampments and how they are jointly coordinating to serve these locations. This may also include shelter sites and other services that are location based. For example, one applicant may lead outreach efforts and collaborate with another applicant to connect these individuals to needed services.

Coordination of and Connection to Service Delivery seeks to understand the role of each applicant and how the various parties are coordinating to provide the full array of services, shelter, and housing to people experiencing homelessness across the region. This could include connection to interim and permanent housing, as well as supportive services and connections to other available benefits, such as CalWORKs or Medi-Cal.

**Q 55:** In the NOFA on page 17, bullet one under the last paragraph "submit contracting information" with the application. Does this mean we need to complete the procurement process before we apply or general contracting information?

**A:** No. Here, contracting information means the information required for Cal ICH to populate and disburse HHAP-5 contracts to HHAP-5 awardees and does not encompass subrecipient contracts.



**Q 56:** What is an example of “Siting and use of available land”?

**A:** Siting and use of available land means identifying and using available and appropriate land to provide relevant services, interim housing, and permanent housing. This often includes identifying appropriate sites and excess land.

**Q 57:** When statute says applicants must post the application, does this mean our HHAP-5 application or our HHAP-5 standard agreement?

**A:** Your HHAP-5 application.

**Q 58:** Could Cal ICH please provide some guidance on how compliance with the housing element might impact HHAP funding for the City? Does compliance need to be met when the funds are issued, at the application time, or when the agreement is signed? Thank you in advance for your time and consideration.

**A:** The HHAP-5 planning allocation, the HHAP-5 base allocation, and the first \$100 million of the HHAP-5 supplemental funding is not connected to Housing Element compliance. Applicants that are proposing to spend HHAP-5 dollars on new interim housing interventions must report the compliance status of their Housing Element and their responses will be reviewed as part of Cal ICH’s assessment of whether the jurisdiction has spent sufficient resources towards permanent housing solutions.

Cities and counties must have a compliant Housing Element in order to be eligible for the remaining \$260 million in HHAP-5 supplemental funding. The application for this funding will be made available by 11/1/24.

Additionally, cities and counties must have a compliant Housing Element in order to be eligible for the supplemental Homekey program described in HSC section 50237. The application for this funding will be made available by 7/1/24.

**Q 59:** The key action section does not allow for multiple funding types, is the expectation to describe the key action for each funding source? For example, the city plans to use federal and state funds for prevention programs, we are working with our federal counterparts to align the plans, should we only report on what we are doing with State dollars?

**Ans.** At a minimum, regions must have at least one key action for each system performance measure, and applicants are required to report all funding sources (Federal, State, Local Govt., etc.) the region intends to use to achieve the key action. In this case, it sounds like the region intends to use more than one funding source to achieve a single key action and needs to identify multiple

funding types. To report this accurately, please use the fill-in option in the funding type dropdown to identify more than one funding type. Please be sure to list funding sources and types in a corresponding order as shown below.

### **Planning Allocation**

**Q 60:** We are currently hosting community meetings to receive feedback on HHAP-5 planning from the public and would like to provide water and small snacks to the people that attend and provide their feedback. Would the costs of water and small snacks be an eligible costs under HHAP-5 planning funds?

**A:** Yes

**Q 61:** Regarding the public meetings that need to be held as part of the HHAP-5 application development process: does the Region hold three joint public hearings, or can each local jurisdiction hold its own separate meeting, and include the CoC?

**A:** Each region must hold at least three public meetings. It is up to the regional partners to determine how to hold these meetings to get community input.

### **Action Plan**

**Q 62:** On page 5 of the NOFA, it indicates that applicants must be “signatory to a Regionally Coordinated Homelessness Action Plan to be approved by the Council.” Does this mean there is a specific approval process on who can sign on behalf of the applicant or is our already approved authorized representative signatory acceptable?

**A:** Here, “Council” refers to Cal ICH. Cal ICH will review and approve or deny each regions’ HHAP-5 application which includes the Regionally Coordinated Homelessness Action Plan. You may follow your local requirements for determining who is authorized to sign on your jurisdiction’s behalf.

**Q 63:** On page 27 of the NOFA it says, “recipients of HHAP-5 shall post final round 5 program application to their website within 30 days”. Is the calendar or business days?

**A:** Calendar.

**Q 64:** Regarding prioritization, it seems like we could simply explain that we will not do place-based prioritization because we are required to strictly do needs-

based prioritization under the federal CES requirements, and that should satisfy the statutory requirement.

**A:** The NOFA requires that the Action Plan describes how the CoC collaborates with cities and counties to address how people served through place-based encampment resolution projects have or will be included in prioritization for permanent housing within coordinated entry systems, but it does not dictate that the CoC offers place-based prioritization. An appropriate response to this section of the NOFA would be to state that CES prioritization is based on need and that being a person experiencing unsheltered homelessness in an encampment would be a factor in assessing their need and vulnerability.

### **Technical Assistance**

**Q 65:** Will there be TA available specifically for the HHAP 5 application process.

**A:** Cal ICH staff is available for support. Additionally, the 1% planning allocation may be used to hire additional support.

### **MOU**

**Q 66:** Our CoC includes multiple counties - if all of the counties redirect funding to the CoC and do not apply on their own do we need any MOUs? The Administrative Entity for the CoC will be making a single application including all counties.

**A:** One MOU is required per regional application that must be signed by each participating applicant in the region. The MOU shall commit all signatories to participate in and comply with the actions, roles and responsibilities described in Regionally Coordinated Homelessness Action Plan. Even if an eligible applicant is not electing to administer their own HHAP funds directly, they still play a role in the homelessness response system, are required to participate in the Regionally Coordinated Homelessness Action Plan and sign the MOU, or they will forfeit their portion of the HHAP-5 dollars. Alternately, because HHAP-5 defines a region based on County limits, in multi-county regions, the CoC could enter into a separate MOU with each county.

**Q 67:** Would it be helpful for our CoC/County to also include our existing countywide MOU since there is an option to upload additional supporting documentation.

**A:** While not required, you are welcome to provide this additional documentation with your HHAP-5 application.

**Q 68:** The NOFA provides: “Memorandum of understanding” has the same meaning as defined in subdivision (f) of Section 50233. But that code section does not define the term; rather, it says: (f) The regionally coordinated homelessness action plan shall be reflected in a memorandum of understanding committing each signatory to participation in, and to comply with, the regionally coordinated homelessness action plan. I have been told that the County views MOUs as legally binding agreements, but the CoC is not incorporated so I don’t know how the County can enter into an MOU with the CoC. Perhaps Cal ICH should amend the NOFA to strike the line that says the term MOU is defined in the statute since it is not? This seems to be a problem with the author of the statute not thinking through the issue of CoCs that cannot enter into legally binding agreements. Since the County is the only entity locally that can be legally responsible for anything, it seems like the MOU should be waived. The County is agreeing to do all of the things in the plan when we agree to the standard agreement.

**A:** The definition of MOU in the NOFA is not defining what an MOU is, rather it is defining what is required to be included in the HHAP-5 MOU. Please see the MOU guidance for HHAP-5 [here](#). If a CoC is authorized to accept money, whether they are incorporated or not, they can also sign an agreement to comply in the activities they have agreed to in the HHAP-5 Action Plan.

**Q 69:** Considering how long the MOU may take to be ratified by our Board of Directors, is there a process that allows us to submit a signed MOU by the County and CoC, and later submit the Board of supervisor approved version later when done?

**A:** An MOU is a legal document and therefore must be signed by someone who has signing authority on behalf of the eligible applicant entity. While Cal ICH does not require a particular body to approve the MOU, each eligible applicant entity must abide by their internal approval processes.

**Q 70:** We are in final draft of our regional MOU and want to ensure that our language correctly references and addresses the action plan requirements. Our updated action plan is still in progress. However, our MOU is much closer to being completed. To this end, we have included the following language to ensure inclusion of the requirement but recognize that it is not detailed or explicit regarding the action plan. “Homeless, Housing Assistance, and Prevention Program. The CoC and County are to participate in, and comply

with, the regionally coordinated homelessness action plan and will commit resources to achieving the goals identified in the plan.”

Will the above insertion meet the required components of the MOU as stated in Section D of the NOFA? Or do the specific actions required of the plan need to be called out in the MOU?

**A:** The MOU must commit each signatory to uphold, participate in, and comply with the specific actions, roles, and responsibilities of each eligible applicant in the region as described in the HHAP-5 Regionally Coordinated Homelessness Action Plan.

**Q 71:** Our authorized representative/signatory for the County and CoC is the same person. The MOU must be signed by signatory of all applicants and in our case, this would be the same person. Would this be acceptable for the MOU or should we have another representative from the Merced CoC/Merced County board sign in addition?

**A:** Provided the person signing on behalf of each eligible applicant has the authority to commit the respective entities to the actions, roles, and responsibilities of each eligible applicant in the region as described in the HHAP-5 Regionally Coordinated Homelessness Action Plan, this would be allowable. To ensure it is clear each eligible applicant entity is committing to their respective roles, the person could list both titles in their signature block.

### **Eligible uses**

**Q 72:** The HHAP-5 NOFA provides the following guidance. “Rapid rehousing: Eligible Uses should be categorized here when the costs support operating a rapid rehousing type housing service. This means a tenant-based, time limited, permanent housing program, inclusive of wrap-around services.” In the HMIS data standards manual, in order to be a rapid rehousing project, HUD says the projects may provide short or medium term rental assistance, implying long term is not allowed in RRH projects. The difference between medium and long term rental assistance is defined in the CoC Interim Rule as 24 months. What is the limit under HHAP for RRH? If we set a limit higher than 24 months, we cannot categorize those projects as RRH in HMIS, so we would have to call them RRH for HHAP purposes and PSH or “other permanent housing” in HMIS.

**A:** Long-term rental assistance is an eligible use of HHAP funds and should be categorized under the delivery of permanent housing. It is included as an example because Cal ICH recognizes that the intervention types do not perfectly align with the HHAP eligible use categories, and the HHAP eligible use categories are not always mutually exclusive. Because projects must be entered into HMIS, you should categorize projects in alignment with HMIS whenever possible.

**Q 73:** Under CES Systems Support, there is HMIS funding noted. Can you clarify what this entails? Does this mean funding license costs for subrecipients to purchase licenses to enter data into HMIS (AB-977)?

**A:** Eligible Uses should be categorized under Systems Support when the costs support homelessness services system infrastructure, regional coordination, and/or improves accessibility and outcomes generally, as opposed to specific client(s). In the case of HMIS, this includes the costs of operating the HMIS, ensuring access to and proper use of the HMIS, and supporting compliance with AB-977 and other grant-specific HMIS statutory requirements.

**Q 74:** It has been our understanding that the youth set aside funds were intended to support unaccompanied youth not in the custody of a parent or guardian (12-24), pregnant youth or parenting youth. Health and Safety Code, Section 50216(k) defines "Homeless youth" as an unaccompanied youth between 12 and 24 years of age, inclusive, who is experiencing homelessness, as defined in subsection (2) of Section 725 of the federal McKinney-Vento Homeless Assistance Act (42 U.S.C. Sec. 11434a(2)). "Homeless youth" includes unaccompanied youth who are pregnant or parenting. Section 725 of the federal McKinney-Vento Homeless Assistance Act (42 U.S.C. Sec. 11434a(2)): 2) The term homeless children and youths' — (A) means individuals who lack a fixed, regular, and adequate nighttime residence (within the meaning of section 103(a)(1)); and (B) includes — (i) children and youths who are sharing the housing of other persons due to loss of housing, economic hardship, or a similar reason; are living in motels, hotels, trailer parks, or camping grounds due to the lack of alternative adequate accommodations; are living in emergency or transitional shelters; are abandoned in hospitals; or are awaiting foster care placement; (ii) children and youths who have a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings (within the meaning of section 103(a)(2)(C)); (iii) children and youths who are living in cars, parks, public spaces, abandoned buildings, substandard housing, bus or train stations, or similar settings; and (iv) migratory children (as such term is defined in section 1309 of the Elementary and Secondary Education Act of 1965) who qualify as

homeless for the purposes of this subtitle because the children are living in circumstances described in clauses (i) through (iii).)

A question was raised around using youth set a side funding, specifically prevention and rental assistance for families with children (households with adults over 25 and children 24 and below). Can the State clarify whether the “homeless definition” is aligning with the McKinney-Vento Act definition of “unaccompanied youth” not in the custody of a parent or guardian? Also, can you clarify the notation of “sharing housing of other persons” noted below. Does that mean sharing housing with immediate family (parents), friends, or any persons willing to share housing? If parents, does that negate them being unaccompanied?

Section 725 of the federal McKinney-Vento Homeless Assistance Act (42 U.S.C. Sec. 11434a(2)): 2) The term homeless children and youths' — (A) means individuals who lack a fixed, regular, and adequate nighttime residence (within the meaning of section 103(a)(1)); and (B) includes — (i) children and youths who are sharing the housing of other persons due to loss of housing,

**A:** Yes, the homeless definition for HHAP is in alignment with the McKinney-Vento Act. While shared housing could include living with friends or relatives, if they are living with their parents, they would not meet the definition of an unaccompanied homeless youth.

**Q 75:** Page 9 of NOFA says “Eligible Uses should be categorized here when the costs support operating a rapid rehousing type housing service. This means a tenant-based, time limited, permanent housing program, inclusive of wrap-around services.” Some RRH projects in our community operate a project-based RRH model. These are master leased properties where clients are placed and provided RRH services and rental subsidies. Are these projects eligible for funding under this NOFA? Would a RRH project be eligible for HHAP 5 funds if they offer a project-based unit as an option? The client could choose between the project-based unit or decide to take the normal RRH services and rent in the private rental market?

**A:** Yes, a project-based unit/program is eligible to be funded with HHAP dollars. Depending on the program design it could be categorized as “Delivery of permanent housing” or “operating subsidies-permanent housing.” We do recommend prioritizing client choice and all programs funded with HHAP dollars must comply with Housing First.

**Q 76:** Could a RRH project adopt a Transitional Housing/RRH model described [here?](#)



**A:** Yes, this would be allowable under HHAP, however, the funds spent on the interim/transitional housing should not be categorized under permanent housing solutions.

**Q 77:** For the purpose of identifying funding prioritized for permanent housing solutions in the HHAP-5 application, does the funding need to be for uses that exclusively benefit the homeless population? For example, HOME funds support the development of affordable permanent housing, housing rehabilitation, and homebuyer assistance which would potentially benefit people experiencing homelessness, but not exclusively so. Should funds for these purposes be included in the amount prioritized for permanent housing solutions?

**A:** Yes, all funding used to increase the supply of affordable permanent housing solutions should be included here.

### **Batch 3: Posted 12/22/23**

#### **Eligible Use Categories**

**Q 78:** Can HHAP grantees (Cities, Counties, and CoCs) subcontract HHAP dollars with tribal partners from tribes that are not federally recognized?

**A:** Yes. While only Federally Recognized Tribes are eligible to apply directly to Cal ICH for Tribal HHAP, this limitation does not apply to subcontracting/ procurement for HHAP dollars carried out by Cities, Counties and/or CoCs. HHAP funding can be used to support your work with local partners, including funding federally recognized and unrecognized tribes through your local procurement processes.

**Q 79:** Where should the long-term rental assistance programs that provide services be categorized? There's a category for time limited rental assistance programs but it kind of looks like long term rental assistance is not one of the eligible uses in the crosswalk. I'm also confused that rapid rehousing is in its own category while also being listed as an example of homelessness prevention. Rapid rehousing projects are distinct from prevention in HMIS because they serve clients who are literally homeless or category 4 while prevention projects serve people who are at risk of becoming literally homeless.

**A:** You should categorize projects in alignment with HMIS whenever possible. Cal ICH recognizes that the intervention types do not perfectly align with the HHAP eligible use categories, and the HHAP eligible use categories are not always mutually exclusive. We will update our examples under prevention to state "rental assistance" rather than rapid rehousing.

**Q 80:** Regarding the guidance in the HHAP-5 NOFA: "Up to 1% of all monies received may be budgeted for costs related to the Homeless Management Information System (HMIS). Related costs include HMIS licenses, training, system operating costs, and costs associated with carrying out related activities." We have increasingly been spending more than this with our Systems Support funds in Rounds 3 & 4. The increased demand on our HMIS is not only due to HHAP-specific reporting requirements, but also a result of expanded programs and agencies as a result of State homeless funding, as well as increased vendor costs. Can you advise if we are still able to budget additional HMIS funds under Systems Support, beyond the 1% admin allowance?

**A:** Yes, HHAP-5's Systems Support eligible use category still supports budgeting HHAP funds towards HMIS funding.

## **PIT count**

**Q 81:** Our tri-county rural CoC has one county that does not have people experiencing homeless during the winter months, but a large number in summer months. Regarding funding, will Cal-ICH be able to take into account the summer PIT that is conducted specifically for this county? They always get low amounts for HHAP because the winter PIT shows 0 homeless, but our summer PIT has a large number of homeless. Would we need to get an exception from HUD for this specific county then? They just recently completed a summer PIT count because a winter count is near impossible due to the difficult terrain.

**A:** We do understand that the winter PIT is not indicative of the year-round homeless count in many counties; however, Cal ICH is directed by statute to use the most recent PIT count data, verified and published by HUD, as it appears in the Annual Homeless Assessment Report. If your jurisdiction would like to complete their PIT count at a different time of year, you would need to reach out to HUD directly and see if that is a possibility.

## **System Performance Measures**

**Q 82:** We are unclear as to what is required as racial equity measures needed for section 2.2 – System Performance Measures and Improvement Plans. Is the direction for this section, to identify at least one racial and/or ethnic disparities related to the measure? Or are we supposed to populate the table with the racial or ethnic group, and the data points as provided by the Cal ICH for this section.

**A:** For the purposes of completing this application section, you will need to refer to the most recent (2022) system performance measure and conduct a disproportionality analysis.

How to find the data: You'll find the subpopulation data in the sheet titled "Detail - 2022", which contains a table for Measure 7 breakout data for specific population groups.

Additional Analysis: The numbers provided therein should ultimately be used to conduct an analysis to identify disproportionality for the identified group in relation to the SPM.

To complete the HHAP-5 Application: Applicants must enter the value from the 2022 SPM spreadsheet into the "measure" field provided within the application. The Key Action(s) and associated information provided in the table below that measure should be informed by your analysis and capture how the region intends to improve the measure.

**801 Capitol Mall, Suite 601 | Sacramento, CA 95814 | (916) 651-2820**  
<https://www.bcsb.ca.gov/calich>

**Q 83:** Are there any resources you can provide that we can reference to understand how the CA SPMs were calculated?

**A:** There are a few resources on our [HHAP webpage](#) that offer some insight into the SPM methodology, which you can find here [California System Performance Measure Guide](#) and here [Crosswalk of California and U.S. Department of Housing and Urban Development System Performance Measures](#). You can also reach out to [HDIS@bcsh.ca.gov](mailto:HDIS@bcsh.ca.gov) with any CA SPM questions.

#### **Batch 4: Posted 1/8/24**

**Q 84:** Can you clarify the definition of the "Amount Prioritized for Permanent Housing Solutions" on the HHAP-5 Plan to Utilize Local, State, and Federal Funds to End Homelessness, Section 2.5? Does this only include funds used directly for housing subsidies and/or permanent housing units, or would it also include housing-focused services such as outreach or housing navigation/location services within outreach, diversion, prevention or interim shelter programs? Also, should it include administrative funds that support permanent housing solutions?

**A:** The "amount of funding prioritized for permanent housing solutions" refers to the portion of your total amount of available funding across the funding programs listed in Section 2.5 (HHAP included) that will be used across all HHAP-5 eligible use categories to support permanent housing solutions, including but not limited to property owner outreach, engagement and incentives, master leasing, subsidies, capital costs. It should not include administrative costs to support these functions.

**Q 85:** For funding permanent housing acquisition/improvement/renovation does Cal ICH have any requirements for regulatory agreements and how long the units must remain permanent housing?

**A:** At a minimum, permanent units acquired and or supported with HHAP 5 should remain permanent housing units and attached to the program until June 30, 2028, when HHAP 5 concludes; however, jurisdictions are encouraged to negotiate these terms for as long as possible, especially if other funding is used to support the units. If other funding is used to support the units, grantees should carefully review the requirements of each separate funding streams. For example, if units are intended to operate as affordable housing units using HCD funds, HCD does require an affordability covenant/regulatory agreement that units will remain affordable housing for 55 years for multifamily projects.

**Q 86:** Several of our homeless service providers have inquired about the allowed percentage of funding to be used for indirect costs. In previous HHAP grants we have deferred to CFR 200 guidance of 10%, but it would be good to get an answer directly from Cal ICH on how to approach this question.

**A:** Cal ICH does not have any specific requirements for the indirect cost percentage of subcontractors/ service providers. We recommend following local policies and procedures and retention of appropriate documentation in case of an audit.

**Q 87:** For Part II: Regionally Coordinated Homelessness Action Plan of the HHAP-5 application, should the information we provide encompass HHAP-5 projects, all HHAP projects, or all funded projects in the homeless response system?

**A:** Part II of the HHAP-5 application (Regionally Coordinated Homelessness Action Plan) applicants should provide information about all funded projects in the homelessness response system.

**Q 88:** For Part III: Funding Plan(s) of the HHAP-5 application, should the information we provide encompass HHAP-5 projects, all HHAP projects, or all funded projects in the homeless response system?

**A:** Part III of the HHAP-5 Application (Funding Plan(s)), applicants should provide information about only HHAP-5 funding.

**Q 89:** We have a local HUD funded permanent supportive housing project that has an operations gap in funding. Based on the Eligible Use Categories table provided in the NOFA, I believe this would be eligible under Delivery of Permanent housing and Innovative Housing Solutions; is that correct?

**A:** Yes, that's correct.

**Q 90:** Is the Operating Subsidies – Permanent Housing category only for housing developments (and not permanent supportive housing programs, such as the project above). Can this funding category be utilized for a scattered site model?

**A:** The Operating Subsidies - Permanent Housing category may support operations of permanent housing. This includes but is not limited to permanent supportive housing programs and scattered site models.

**Q 91:** Are landlord incentives under the Rapid Rehousing category only for short term rentals? Are landlord incentives for permanent supportive housing, EHV/MVP, or HUD VASH eligible as well?

**A:** Rapid Rehousing is a tenant-based, time limited, permanent housing program, inclusive of wrap-around services. Landlord incentives that support this kind of program should be categorized under Rapid Rehousing. Landlord incentives for permanent housing that is not tenant-based and/or time limited can be categorized under Delivery of Permanent housing and Innovative Housing Solutions.

**Q 92:** The Rapid Rehousing category lists move-in expenses as an eligible expense; does that include ongoing utility assistance? If not, is that eligible under a different category?

**A:** Utility assistance for the eligible population is an eligible use of HHAP funding. This expense should be categorized with the program/housing providing this assistance. E.g., if it is a service provided as part of a Rapid Rehousing program, the cost should be categorized under Rapid Rehousing.

**Q 93:** On Page 27 of the NOFA it states “the Council and recipients of HHAP-5 shall post final round 5 program applications to their respective internet websites within 30 days of disbursement to the applicant.” Does this mean that we have to publish our application within 30 calendar days of the disbursement of funds?

**A:** Yes that's correct.

**Q 94:** On Page 18 of the NOFA it states, “Cal ICH will publish on their website a template for regional applicants to use when drafting the Action Plan components”. Has this document been released? Is the HHAP 5 Application Template supposed to serve as this template? Please advise.

**A:** Yes. The [HHAP-5 application template](#) includes all required components of the Regionally Coordinated Homelessness Action Plan.

**Q 95:** The HHAP-4 NOFA required us to agendize the application at a regular governing body meeting but we're not seeing the same requirements in the HHAP-5 NOFA or FAQs. Can you confirm whether the agendizing requirement exists for HHAP-5? We want to ensure we're not missing this step.

**A:** There is no requirement in HHAP 5 to agendize the application. The applicant is required to apply as part of a region and be signatory to a Regionally Coordinated Homelessness Action Plan and MOU. In addition, each region is required to hold three public meetings during the development of the Regionally Coordinated Homelessness Action Plan. Please refer to section 2.8 of the [HHAP-5 Application Template](#) for more information.



## **Batch 5: Posted 1/30/24**

### **Sufficient Resources Towards Permanent Housing**

**Q 96:** HHAP-5 statute and the NOFA state that before proposing to use any HHAP-5 dollars to fund new interim housing solutions, the region must demonstrate that they have dedicated sufficient resources from other sources to long-term permanent housing solutions, including capital and operating costs. How is Cal ICH defining “sufficient resources towards permanent housing solutions” for purposes of HHAP-5?

**Answer:** If a region meets either of the following criterion, they will be determined to have dedicated sufficient resources towards permanent housing solutions:

- 1) No less than fifty (50) percent of the region's other (non-HHAP) state and federal dollars must be invested in permanent housing.

OR

- 2) The percentage of local general fund or other local funding invested in permanent housing must be equal to or greater than the percentage of their region's homeless population, respective to the state's homeless population. For example, a county that has 5% of the state's homeless population based on the 2023 Point-In-Time count, would need to have a total of 5% of their overall general fund or local funding invested in permanent housing to meet this criterion.

Please note, in the Demonstration of Dedicated, Sufficient Resources for Permanent Housing section of the HHAP-5 application, we ask for all funding in the region and the percentage of that funding that is dedicated towards permanent and interim housing solutions. Cal ICH will use the information from this section and the Regionally Coordinated Homelessness Action Plan to conduct a separate analysis to determine if applicants meet the above criterion.

**Q 97:** How will the status of policy actions, as asked in the HHAP-5 application, be assessed towards the demonstration of sufficient resources towards permanent housing?

**Answer:** Cal ICH will assess the answers provided for compliance with or adequate plans to come into compliance with the five policy actions listed.

## System Performance Measures

**Q 98:** We are in the process of using the provided CA SPMs and associated data for our HHAP-5 Regionally Coordinated Action Plan. However, we are a two county Continuum of Care and all of these numbers are for the bi-county region. The challenge with this is that our two counties have varied demographics and ethnicity. How do we get county specific numbers to inform our key actions?

**Answer:** The California SPMs can only be generated at the CoC level, and it is not possible to generate them for a geography smaller than a CoC (in this case separating by County). Applicants are allowed to use additional local data sources for their demographic analysis that can be disaggregated by county (e.g. county specific PIT counts and their HMIS data) to identify racial/ethnic disparities that are county specific, and then set key actions that will improve the CA SPMs. See additional guidance on how to fill out the application in this scenario below.

- For general population SPMS and Subpopulation disparities measures (SPMs 7.1-7.6), input the provided CA SPM (CoC level data) when filling out the HHAP-5 application. (See example below)

*SPM 7.3: Racial and ethnic disparities in the number of people exiting homelessness into permanent housing.*

Racial or Ethnic Group	Measure

- When determining the Key Actions to be taken, applicants may use other, additional, or disaggregated data sources to help inform their analysis and identified actions. indicating these sources and/or analysis under “Method(s) of Measuring success of the Action”. (See example below)

*Key Action(s) for Improving SPM 7.3*

Key Action(s)	Funding Source(s) the region intends to use to achieve the action	Funding Type (Federal/State/Local gov/Other)	Lead Entity	Collaborating Entity/ies	Timeframe for Action	Method(s) of Measuring success of the Action

## MOU

**Q 99:** I have a question regarding the MOU that is required for the HHAP-5 application. Would a Memorandum of Agreement (MOA) be an acceptable document so long as it includes the standards set forth in the guidelines or are MOUs the only document that you will be accepting?

**Answer:** An MOA would be acceptable provided it follows the [HHAP-5 MOU Guidance](#).

**Q 100:** In our region, we work very closely together on all parts of our HHAP action plans. We have always submitted identical applications and are therefore happy to enter into an MOU committing continued collaboration. Currently, our MOU is broad and states the required items listed in the guidance provided by Cal ICH. Will a broad MoU fulfill HHAP-5 requirements?

**Answer:** MOUs will be accepted if applicants follow the [HHAP-5 MOU Guidance](#) by including a summary of the roles, responsibilities, and actions of each eligible applicant within the region, as described in their HHAP-5 application.

**Q 101:** In a multi-county CoC, what happens if one of the counties refuses to sign the MOU as part of the Regionally Coordinated Homelessness Action Plan? Would the entire region be ineligible for HHAP-5 funds?

**Answer:** In order to be eligible for a HHAP-5 allocation, a jurisdiction must be signatory to the Regionally Coordinated Action plan and an MOU committing each signatory to the roles and responsibilities described in their action plan. In this case, only the jurisdiction that refuses to sign would be ineligible for HHAP-5; the remaining jurisdictions in the region who did sign the MOU would still be eligible to receive their HHAP-5 awards.

**Q 102:** What happens if a jurisdiction is unable to sign the MOU before March 27th?

**Answer:** All HHAP-5 applications must be submitted no later than 5:00 pm on March 27, 2024. If an application is submitted without a signed MOU, Cal ICH will work with the applicant during the application review period to get a final MOU executed and submitted. The HHAP-5 application would not be approved, and funds would not be disbursed until all aspects of the application, including the MOU, are complete and approved by Cal ICH.

**Q 103:** Regarding the HHAP 5 MOU requirement, is there an effective term date range that is required?

**Answer:** The MOU must cover the HHAP-5 grant term and the period of the Regionally Coordinated Homelessness Action Plan.

### **Batch 6: Posted 3/8/24**

### **New Interim Housing Solutions**

**Q 104:** In reviewing the HHAP-5 NOFA, I understand that we need written permission to utilize our allocation for new interim housing solutions. I was curious to understand how new is defined and the decision-making process for approval.

**Answer:** Any interim housing solution that is not already operating and serving clients would be considered new for purposes of HHAP-5. Cal ICH will review requests to spend funds on new interim housing interventions and will make the determination if the region has dedicated sufficient resources to permanent housing interventions (as described in FAQ 96) as part of the application review process. Cal ICH will inform grantees whether they have met the criteria to spend HHAP-5 on new interim housing solutions.

**Q 105:** In reviewing the NOFA, we understand that our CoC must receive approval for the state to fund new Interim housing. Does this rule apply to existing shelters for expansion or improvements?

**Answer:** Improvements to existing shelters would not be considered a new intervention, but expansions that increase the number of beds/units would be considered funding new interim housing interventions.

**Q 106:** I am contacting you to seek clarification on how to determine whether a project is "existing" for the purposes of HHAP-5 funding eligibility. We are in collaboration with a non-profit organization which has been talking about/working on a low barrier shelter project for over a year now, even prior to the announcement of HHAP-5 funding. We believe that this project falls under interim shelter for HHAP 5, but we are not sure what information is required by Cal-ICH to show that this project exists. Additionally, we would like to know how we can obtain approval to use HHAP-5 funds to support this project.

**Answer:** Cal ICH has clarified that "already in existence" means the units are already part of the homelessness services system and already serving clients. In this case, plans for a new shelter does not meet the threshold of already in existence. To obtain approval to use HHAP-5 funds to support this project, the applicant will need to complete the "Demonstration of Dedicated, Sufficient Resources Towards Permanent Housing" section of the application. Please see FAQ 96 for more information on how Cal ICH will assess dedicated, sufficient resources.

**Q 107:** Please advise what steps are necessary to request a New Interim Housing Certification prior to submitting our HHAP-5 application, if any. It appears that a certification is not required prior to submission, but due to the language in the HSC, we would like clarification.

**Answer:** We will assess the dedicated sufficient resources towards permanent housing as part of the HHAP-5 application review process.

### **Sufficient Resources Toward Permanent Housing**

**Q 108:** In the application there is the question "How much funding is prioritized for permanent housing solutions?" Would this include Rapid Rehousing funds or only Permanent housing projects?

**Ans:** Yes, it would include rapid rehousing. Please refer to Q 84 of FAQ.

**Q 109:** How is Cal ICH determining a county's percentage of the state's homeless population? Or please explain how we can determine this figure.

**Answer:** As noted in FAQ 96 Cal ICH will use the 2023 PIT count for each region and compare it to the state's total homeless population, per the 2023 PIT.

**Q 110:** Please clarify what is meant by "... overall general fund or local funding invested in permanent housing..." Are their specific definitions for each of these funding sources that we can reference?

**Answer:** This means the percent of all local funds (i.e., any funds which are not provided by the state or federal government, including general funds, local bonds, etc.) invested in permanent housing. Cal ICH will use the information provided in section 2.5 of application to identify local funds dedicated towards permanent housing and will reach out to applicants as needed to obtain their "total local funding" amount in order to perform the second analysis.

## **MOU**

**Q 111:** Does the MOU have to get approval from the Board of Supervisors?

**Ans:** The MOU does not have to be approved by a Board of Supervisors; however, it is a legal document and therefore must be signed by someone who has signing authority on behalf of the eligible applicant. While Cal ICH does not require a particular body to approve the MOU, each eligible applicant entity must abide by their internal approval processes.

**Q 112:** The Funding Plan, which is the proposed uses of HHAP-5 dollars, is not required nor expected to be included in the MOU, correct?

**Answer:** Correct, the Funding Plan is not required to be included in the MOU.

## **Eligible Uses**

**Q 113:** We are considering funding acquisition of a motel to be converted to a rehab facility using HHAP-5 funds. We believe this to be an innovative housing solution, however it will be a type of temporary housing. Would a project like this be considered interim housing? Or could this instead be under the innovative housing solution category? This is a major need in our region and a facility like this could help people succeed when they finally move into permanent housing instead of falling back into homelessness.

**Answer:** All programs funded with HHAP dollars must comply with the core components of Housing First. Provided this facility is Housing First compliant, this would be an eligible use under Interim Housing. As a reminder, jurisdictions proposing to spend any HHAP-5 dollars on new interim housing interventions, must first demonstrate they have spent sufficient resources towards permanent housing solutions and receive written approval from Cal ICH.

**Q 114:** Does transitional housing for youth qualify under Interim sheltering? We have an agency who was awarded Homekey funding, however, they have operational gaps and were inquiring if transitional housing is eligible under Interim sheltering. They serve literally homeless youth 12-24 and are housing first compliant.

**Answer:** Yes, supporting transitional housing for youth qualifies as an eligible expense under HHAP and should be categorized under "Operating Subsidies – Interim Housing" and/or "Interim Housing" depending on the activities being funded and program design. Provided these dollars do not exceed the 10 percent youth set aside, you would not need to demonstrate sufficient resources towards permanent housing interventions prior to investing in this intervention.

**Q 115:** Can Cal ICH provide further clarification of hygiene services eligible under the Eligible Use Category "Street Outreach"?

**Answer:** HHAP funds may be used for sanitation services that promote safety, health, and wellness for people experiencing homelessness. This may include but is not limited to non-intrusive, curb-side waste removal, provision of hygiene kits, and access to clean and available bathrooms. HHAP funds may not be used for site restoration or encampment clearances.

**Q 116:** Are Housing Navigation Services only eligible under the Eligible Use Category "Street Outreach"? That is the only location I see them listed for HHAP-5.

**Ans:** Housing Navigation is an eligible use of HHAP funds and may be categorized under a number of different Eligible Use Categories depending on how the service/project is set up locally. It is a best practice to categorize the costs of services provided as part of a specific project with the associated project (e.g., if the housing navigation services are provided as part of a rapid rehousing project, Cal ICH would recommend categorizing the costs under the Eligible Use category "Rapid Rehousing"). Given this guidance, a grantee may elect to categorize housing navigation under a number of different Eligible Use Categories including: "Delivery of Permanent Housing", "Rapid Rehousing", "Shelter Diversion", "Interim Housing", or "Street Outreach". Alternatively, if the housing navigation service is provided separately or across multiple projects, Cal ICH recommends categorizing the service under Eligible Use Category "Services Coordination".

**Q 117:** For HHAP -5 allocations, is the “Planning Allocation” a maximum amount or required amount?

**Answer:** It is the maximum amount. Any unused planning allocation funding shall be expended consistent with the purposes of the HHAP-5 base allocation.

**Q 118:** The NOFA states, “This funding shall be transferred directly to the HMIS lead entity and is intended to support the functioning, maintenance, and operation of the local HMIS.” If our jurisdiction chooses to allocate the 1% for HMIS, will we be in charge of transferring that directly to our HMIS lead once we receive our check, or will those funds be deducted from our initial allocation and redirected to our HMIS lead by you?

**Answer:** The Council may authorize applicants to allocate an additional one percent of funds to cover expenses associated with HMIS. Related costs include HMIS licenses, training, system operating costs, and costs associated with carrying out related activities. The funds should be transferred to the HMIS lead entity by the grantee for related costs as per the agreement.

**Q 119:** Can HHAP-5 funds be spent on operating subsidies for the operational costs of a supportive housing facility such as an existing emergency overnight shelter facility servicing exclusively homelessness?

**Answer:** Yes. These funds should be reported under the HHAP-5 ‘Operating Subsidies – Interim Shelter’ Eligible Use category. As a reminder, HHAP-5 splits the ‘Operating Subsidies’ Eligible Use category into two categories -- Operating Subsidies in support of Permanent Housing, and Operating Subsidies in support of Interim Housing. HHAP-5 also defines “Interim Housing” as the full range of shorter-term, crisis options for temporary accommodations which may currently be referred to by a variety of terms: congregate or non-congregate emergency shelter; navigation centers; bridge housing; transitional housing; or other models or terms which do not require occupants to sign leases or occupancy agreements.

## **Application Questions**

**Q 120:** On section 2.5 Plan to Utilize Local, State, and Federal Funds to End Homelessness-- We have a Homekey project in our area that was funded in 2022. The funds were fully spent then on the project, and now the project runs off referrals from Coordinated Entry. I’m assuming because the purchase funds were spent 2 years ago that this funding source does not appear on this chart, correct? Would this be the same for No Place Like Home projects from 2-3 years ago, as well?

**Answer:** For section 2.5 we are looking to capture available funds within the HHAP-5 grant term (FY 23-24 through FY 27-28).



**Q 121:** For application section SPM 1b: Number of people experiencing unsheltered homelessness on a single night (unsheltered PIT count), we wanted to confirm whether we should use the data we have from 2022 to match other SPM data or if the most updated data from 2023 should be reflected in this section.

**Answer:** You may use either the 2022 or 2023 data.

**Q 122:** For the application section "Status of Policy Actions", housing element, pro-housing designation, etc., we plan on responding on one line as the collective eligible applicant. Please let us know if there is another way we should complete this.

**Answer:** If the answer is the same across the city, county, and CoC, you would enter all eligible applicants in the provided text box. If the answer differs across the city, county, and/or CoC for any of the policy actions, please separate the responses and indicate which eligible applicant(s) the response applies to.

**Q 123:** We do not have sufficient data to assess racial or ethnic disparities for SPM 7.6. How would you like us to handle this section of the application?

**Answer:** Because CA SPM data was suppressed and therefore not provided, we recommend using other available data sources to complete this portion of the application. Applicants are allowed to use additional local data sources for their demographic analysis (e.g., PIT counts and their HGIS data) to identify racial/ethnic disparities, and then set key actions that will improve the CA SPMs.

Example scenario below:

- For general population SPMs and Subpopulation disparities measures (SPMs 7.1-7.6), input the provided CA SPM (CoC level data) when filling out the HHAP-5 application (screenshot below).

SPM 7.3: Racial and ethnic disparities in the number of people exiting homelessness into permanent housing.

Racial or Ethnic Group	Measure

- When determining the Key Actions to be taken, applicants may use other, additional, or disaggregated data sources to help inform their analysis and identified actions. indicating these sources and/or analysis under "Method(s) of Measuring success of the Action" (screenshot below).

Key Action(s) for Improving SPM 7.3

Key Action(s)	Funding Source(s) the region intends to use to achieve the action	Funding Type (Federal/ State/ Local gov/Other)	Lead Entity	Collaborating Entity/ies	Timeframe for Action	Method(s) of Measuring success of the Action