## Homeless Housing, Assistance, and Prevention Program (HHAP)

## Frequently Asked Questions, Part 2

This is a supplemental resource to the <u>HHAP Program Guidance</u> and the previous <u>HHAP FAQs document</u>. Please refer to the <u>HCFC website</u> for more details about the HHAP grant program or <u>contact us</u> for specific questions not answered here.

## **Eligible Uses**

- 1. Do the programs I administer using HHAP funds need to comply with California's Housing First policy?
  - Yes. HCFC requires that any state program paid for with HHAP funds shall align and comply with the core components of Housing First as defined in Welfare and Institutions Code Section 8255(b). State programs are defined, per Welfare and Institutions Code Section 8255(e), as "any programs a California state agency or department funds, implements, or administers for the purpose of providing housing or housing-based services to people experiencing homelessness or at risk of homelessness, with the exception of federally funded programs with requirements inconsistent with this chapter or programs that fund emergency shelters."
- 2. How do I know if a project I am proposing meets the eligible use criteria?

  The parameters of the program are intentionally flexible so as to meet each jurisdiction's specific needs but also align with best practice. HCFC provided examples of eligible projects in the <a href="Promising and Evidence-Based Practices">Promising and Evidence-Based Practices</a>
  document, but please note that is not an exhaustive list. Applicants are encouraged to review the eligible uses under Health and Safety Code § 50219(c)-(d) and the <a href="Promising and Evidence-Based Practices">Practices</a> document to ensure that programs meet specific needs that have been identified in their communities. Within the application narrative, applicants must explain in detail, plans to use the full amount of HHAP funds and identify the eligible use category or categories that a proposed project fits into and how it was determined to be an eligible use. In addition, projects should be focused on ways to move individuals and families experiencing homelessness into permanent housing.
- 3. Are building projects, including new or renovation construction, paid for with HHAP funds subject to state prevailing wage?
  - HCFC considers HHAP funds to be "public funds" as that term is used in <u>Labor Code § 1720</u>. Nevertheless, there are a variety of factors that may affect whether a project will be required to pay state prevailing wage. It is recommended that applicants consult with an attorney and/or the Department of Industrial Relations to determine whether a planned building project will be required to pay state prevailing wage.

4. Please clarify the administrative costs allowed with HHAP funds.

The administrative entity (AE) is eligible to use up to 7% of its HHAP allocation for the purposes of administering the grant. Administrative costs include tasks such as running the local collaborative process, monitoring, reporting, technical assistance to subgrantees, and overhead costs. For the purposes of this program, staff and other costs directly related to implementing activities funded by the HHAP allocation are considered activity-delivery costs and not subject to the cap on administrative costs.

5. What costs related to "access to jobs programs" are eligible uses of HHAP funding?

To maximize HHAP funding, HCFC strongly encourages applicants to coordinate with local workforce investment boards and social services agencies to determine if clients are eligible for existing employment programs. For clients that are ineligible for existing programs, examples of eligible uses for HHAP funding to provide access to job programs include but are not limited to:

- Transportation Costs
- Quality child care
- Cost of equipment necessary for job/education programs
- Subsidizing costs to attend job/education related programs

HCFC encourages grantees to exercise judgement on the reasonableness of the costs associated with accessing job programs, and to have policies in place to that effect.

- 6. Can HHAP funds be used to operate facilities that provide outreach services?

  Yes, per Health and Safety Code Section 50219(c)(4), HHAP funds can be used to provide outreach, case management, access to the Coordinated Entry Systems, and connecting clients to other types of assistance.
- 7. Can grantees spend 5 percent of their program allocations each on 1) infrastructure to support coordinated entry, 2) infrastructure development to support HMIS, and 3) development of a strategic homelessness plan, for a total of up to 15 percent of the program allocation?
  No, per Health and Safety Code Section 50219(d), grantees are limited to spending 5 percent of their total program allocations on the three categories above combined, not 5 percent for each of the categories.
- 8. HHAP requires that applicants obligate at least eight percent of their allocations towards services for homeless youth populations. Can this eight percent be used on programs that serve adults and youth, so long as at least eight percent of the population served by the total HHAP allocation are homeless youth? Yes, however, HCFC strongly encourages that youth-specific services be provided, per <a href="Promising and Evidence-Based Practices">Promising and Evidence-Based Practices</a>, as successful interventions can be different for youth populations. HCFC strongly encourages

applicants to collaborate with youths directly and with those who work with homeless youth populations, such as schools and educators, youth program providers, after school programs, and community centers, to determine the best use of funds.

9. When can HHAP funds be used to replace existing funding?

Recipients may not use HHAP funds to supplant existing local funds for homeless housing, assistance, or prevention. HHAP funds cannot replace local funds that are committed to an existing or developing homeless assistance program. However, if funds previously supporting a service or project end or are reduced for reasons beyond the control of the grantee and services or housing capacity will be lost as a result of these funds ending, HHAP funds may be used to maintain the service or program. Examples include, but are not limited to, a time-limited city and/or county tax or one-time block grant, such as HEAP.

10. Although the HHAP funding period is 5 years, can we expend the full program allocation in less than 5 years.

Yes, grantees may expend the full program allocation in less than 5 years. Counties must obligate their full program allocations by May 31, 2023. Continuums of care and large cities must obligate at least 50 percent of their program allocations by May 31, 2023 and must expend their full program allocations by June 30, 2025.

- 11. Can HHAP funds be used for tenant-based rental assistance programs?

  Yes, per the Health and Safety Code Section 50219(c)(1), (2), (3), and (7), HHAP funds may be used to develop tenant-based rental assistance programs. HCFC encourages grantees to support programs that utilize a progressive engagement approach. This means programs help households end their homelessness as rapidly as possible, despite barriers, with minimal financial and support resources. More supports are offered to those households who struggle to stabilize and cannot maintain their housing without deeper assistance.
- 12. Can HHAP funds be used for one-time costs related to supportive, rapid rehousing housing programs, including utility deposits and the purchase furnishings; or move in stipends that support food, household supplies, and hygiene products?

Yes, these costs are permissible per the <u>Health and Safety Code Section</u> 50219(c)(1), (2), (3) and (7).

## **Applications**

Where can county and city applicants get access to data on the demographics of the homeless population in the region that is required for the application narrative?

CoCs are expected to share the Longitudinal Systems Analysis (LSA) from October 1, 2017 to September 30, 2018, which contains the demographic data on the homeless populations in the jurisdiction, with applicants in the overlapping

jurisdictions (i.e. the applicable county/counties and large city/cities). Acknowledging that there may be differences in demographics and characteristics within a region, large city, and county, applicants may also include additional information and data that is specific to the jurisdiction they represent. CoC's are also required to share the LSA data with the other HHAP applicants within their jurisdiction. Large cities and counties are not required to submit the LSA data with their application but can do so if they see fit.

- 2. Where can applicants review the required HMIS Data Sharing Agreement?

  The HMIS Data Sharing Agreement will be included for review as an exhibit in the grantee's Standard Agreement that must be signed prior to receiving funding. This will come during the award process.
- 3. If a jurisdiction is redirecting their allocation to the local CoC, does the jurisdiction seeking to redirect funds need to submit an application for HHAP funding?

No, jurisdictions wishing to redirect their allocations do not need to submit an application. The jurisdiction receiving the redirected funds will apply on behalf of the jurisdiction wishing to redirect funds and must submit a binding resolution or agreement signed by both jurisdictions that confirms and accepts the redirection of funding. The jurisdiction receiving the redirected funds must specify in their application how they will spend all funds, including those that were redirected.