Homeless Housing, Assistance and Prevention (HHAP) Grant Program Round 6

Frequently Asked Questions (FAQ)

As of July 15, 2025

Are you a HHAP Eligible Applicant with additional questions about the HHAP 6 Application? Email HPDHomelessnessGrants@hcd.ca.gov and we will respond to your question and add it to this document.

How to Navigate the FAQ: This FAQ document's sections match the HHAP 6 NOFA Sections, so Eligible Applicants can find questions that pertain to each section of the NOFA in the same section of the FAQ, respectively.

Important Links:

- HHAP 6 NOFA
- HHAP Round 6 Regional Application Template
- HHAP 6 Application Portal
- HHAP Fiscal Dashboard
- California Interagency Council on Homelessness (Cal ICH) Guidance on Addressing Encampments

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Section I. OVERVIEW

B. Purpose and Program Objectives

Q 1: Are people experiencing sheltered homelessness and those at risk of homelessness eligible to be served under HHAP 6?

A: Yes.

C. Application Timeline

Q 1: After receiving a HHAP 6 award, what is the date back to which grantees may begin reimbursing themselves?

A: After receiving an award from HCD, HHAP 6 awardees will be allowed to reimburse themselves back to the NOFA publication date, February 24, 2025.

Section II. ELIGIBILITY REQUIREMENTS

Section III. ELIGIBLE USES

Q 1: Is Street Outreach still an eligible activity under HHAP 6?

A: Yes, Street Outreach is eligible under HHAP 6 and detailed in Section III. of the NOFA, Statute Category #4 (Non-housing Solutions), p. 9-10.

Eligible Applicants are still required to budget and spend at least 50 percent of their HHAP 6 allocation on housing solutions.

Q 2: Does New Interim Housing mean new to HHAP or new in the community? Would existing interim housing funded by time-limited dollars be considered new?

A: For HHAP 6, New Interim Housing refers to all interim housing solutions that did not exist prior to being funded by HHAP 6. Eligible Applicants can find a list of New Interim Housing Eligible Uses in Section III of the NOFA, Statute Category #3, excluding Improvements to Existing Interim Housing.

Q 3: Is safe parking an eligible use of HHAP 6? If so, under what eligible use category?

A: Yes, safe parking is an eligible use of HHAP 6 and may be budgeted under Statute Category #4, Non-housing Solutions that can prevent or serve those experiencing unsheltered homelessness.

Q 4: Are there any other potential funding sources or eligible use categories that could support HMIS System Administration outside of Administrative Costs (up to 7% of allocation amount) and HMIS (up to 1% of allocation amount)?

A: Applicants are strongly encouraged to explore other state-administered funding sources for their potential to contribute to HMIS operations and overall infrastructure. For example, CalWORKs Housing Support Program (HSP), Behavioral Health Bridge Housing (BHBH) and Emergency Solutions Grant (ESG) may be used to support HMIS-related activities when those activities are necessary for tracking outcomes, enhancing service coordination, or fulfilling

reporting requirements. Applicants should use the regional plan requirement to engage with their local program administrators to determine how various funding streams can be aligned to support HMIS infrastructure. Leveraging multiple funding sources can strengthen regional data capacity and ensure continuity in systemwide performance tracking and evaluation.

If your community is experiencing challenges in aligning resources to support HMIS, we strongly encourage you to reach out for technical assistance by emailing both hdis@bcsh.ca.gov and HPDhomelessnessgrants@hcd.ca.gov. Our partners at Cal ICH can help identify opportunities, navigate funding restrictions, and facilitate conversations with regional partners to address challenges.

If other funding sources, coordination support, and technical assistance does not fully address your needs, HCD may, on a case-by-case basis, approve additional HMIS-related expenses under Statute Category #4: Non-Housing Solutions that serve or prevent homelessness among people experiencing unsheltered homelessness.

Q 5: Can HHAP funds be used to make loans to multifamily housing developments?

A. Yes, HHAP funds may be loaned by HHAP grantees to multifamily affordable housing projects when doing so aligns with local plans to address homelessness and meets all other HHAP requirements. This will allow HHAP funds to work harmoniously in low-income housing tax credit (LIHTC) funded projects. HCD anticipates that this would customarily be accomplished through a HHAP grantee making a subgrant of HHAP funds to an affordable housing sponsor, which in turn would loan those funds to a specific affordable housing project.

Q 6: Under what circumstances is lending to multifamily affordable housing projects allowable?

A. Grantees lending HHAP funds to multifamily housing projects may be appropriate in circumstances such as:

- **Housing Production or Preservation**: The loan is part of a financing stack to build or preserve units designated for people experiencing or at risk of homelessness.
- **Tax Credit Projects**: The project needs a soft loan from a public source (e.g., HHAP funds) to qualify for Low-Income Housing Tax Credits (LIHTC) or other affordable housing programs.

Compliance with HHAP Goals: As with all HHAP 6 funding, the activity must help the jurisdiction meet local and state goals around reducing or ending homelessness. Note: Affordable housing production or preservation most directly furthers CA SPM 3: Number of people exiting homelessness into permanent housing, and a stronger permanent housing pipeline can also have indirect benefits for other system performance measures.

Q 7. Where should costs previously eligible under Systems Support be categorized within our HHAP 6 budgets?

A: Activities budgeted under the Systems Support eligible use category under previous rounds of HHAP covered costs that support homelessness services system infrastructure, regional coordination, and/or improve accessibility and outcomes generally, as opposed to specific client(s). Depending on the activity, those costs may be budgeted under Administrative Costs or Non-housing Solutions. Grantees may also utilize other sources of funding in the Regionally

Coordinated Homelessness Action Plan to sustain and enhance activities previously funded by Systems Support.

Section IV. APPLICATION SUBMISSION, REVIEW, AND AWARD PROCESS

A: Application Required Components

2. Required Components - Documentation of Stakeholder Engagement

Q 1: We have not identified a federally recognized tribal government in our region. How should we meet the requirement to engage with federally recognized tribal governments in our public stakeholder process?

A: All Eligible Applicants within the region should coordinate to ensure that federally recognized tribes from within the region are invited to the (at least) three public meetings. If there are no federally recognized tribes within the region, it is recommended to include tribes in neighboring regions as members of tribes from neighboring counties may live within the region. Regions are also encouraged to reach out to unrecognized tribes or tribal stakeholder groups as well.

If you need any technical assistance in connecting to tribes or tribal stakeholder groups, please email ciap@hcd.ca.gov.

Q 2: Does each eligible applicant need to hold three public meetings to satisfy the stakeholder Engagement Requirement? For example, could a large city attend the same stakeholder engagements with the county and be counted for both entities? For multi-county CoCs, can they hold the required three public stakeholder meetings as sub-regional meetings instead of one large regional meeting?

A: There is local flexibility. Per NOFA Section IV.A.2. the requirement is that the **region** must engage in a public stakeholder process that includes at least three public meetings allowing for extensive input from various groups and individuals. The organization of these meetings is likely to look different in different regions depending on their needs, geography, partners, etc. Regional partners should collaborate to establish an application development plan that collectively includes at least three public meetings, through which **all** participating applicants invite and encourage all of the outlined groups to engage in developing the HHAP 6 Regionally Coordinated Homelessness Action Plan.

Q 3: We have monthly county-wide meetings on homelessness where we discuss HHAP among other topics, does this count as a stakeholder engagement meeting?

A: Yes, existing meetings can count if they occur within the specified timeframe (after Feb 24, 2025) and specifically address the development of the HHAP 6 Regionally Coordinated Homelessness Action Plan as part of their agenda. HHAP 6 doesn't need to be the sole topic, but HHAP 6 must be a clearly documented topic within those meetings.

Q 4: Does stakeholder input documented need to be specific for each stakeholder group or can it be summarized across groups? We have community meetings with more than one stakeholder represented and it may be hard to identify which stakeholder the input is coming from.

A: Whenever possible identify the stakeholder group that provided the feedback. If you are unable to identify the specific group, then you may include that feedback in the open "other input" box below the stakeholder engagement and feedback table.

3. Required Components - Regionally Coordinated Homelessness Action Plan

a. Sub-Component: Regional Partner's Roles and Responsibilities:

Q 5: The first four Roles and Responsibilities are similar to the HHAP 5 NOFA, can we reuse what we submitted from HHAP 5?

A: Yes, you can absolutely reuse content from your approved HHAP 5 plan where the HHAP 6 application is asking for the same information about your region's coordinated homelessness action plan, or you can start from that content and update it based on changes within your region since your HHAP 5 plan approval.

Q 6: How do Eligible Applicants check compliance with the housing law violations and surplus land requirements?

A: All Large City and county Eligible Applicants should first inquire with their respective housing departments to determine the responses to the Housing Law Violation (Section 3.a.9) and Surplus Lands (Section 3.a.10) sections of the application.

To check compliance with the housing law violations requirement, please submit a request to compliancereview@hcd.ca.gov.

To check compliance with the surplus land requirement, refer to APR Table H in the Housing Element Annual Progress Report (APR) Data portal.

Q 7: May the Regional Partner Roles and Responsibilities section of the Regionally Coordinated Homelessness Action Plan, including Housing Element Compliance and Prohousing Designation, include roles and responsibilities for small cities and tribal governments located within (or next to) the region but do not receive a dedicated HHAP allocation?

A: Cities that do not receive a direct allocation of HHAP and tribal governments are encouraged to be considered and included in the Regionally Coordinate Homelessness Action Plan as detailed in NOFA Section IV.A.3.a., but their participation in the plan is optional.

They should also be consulted and invited to engage in public meetings held to gather input and develop the Regionally Coordinated Homelessness Action Plan, as required in NOFA Section IV.A.2.

Prohousing Designation:

Q 8: In Section 3.a.8. of the application, "Prohousing Designation," there is no drop-down option for "Not planning on applying for Prohousing Designation." Is planning to apply for the Pro-housing Designation, at a minimum, required to receive an award for HHAP 6?

A: The main cause of homelessness is lack of affordable homes. It is critical that HHAP 6 regional partners are taking actions to accelerate housing production and preservation strategies to prevent further homelessness upstream. Obtaining or applying for the Prohousing Designation from HCD means the regional partner is taking actions beyond their

local mandate to accelerate housing production, increase development capacity and variety, streamline the housing process, bring planning into consistency with state priorities, promote equitable outcomes, and collaborate to align policies and programs. HCD strongly encourages all Large City and county HHAP 6 regional partners to adopt Prohousing policies and apply for Prohousing Designation.

If a Large City or county Eligible Applicant 1) is not, 2) has not applied to be, or 3) does not plan to apply to be Prohousing Designated, the jurisdiction does have the option to not select any option from the "Current Prohousing Designation Status" dropdown, but the jurisdiction must list the Prohousing Policies (as described in the Prohousing application) that they have adopted or plan to adopt in the future.

Policies for Addressing Encampments

Q 9: For the purpose of identifying encampments or encampment zones in Section 3.a.5, "Policies for Addressing Encampments," how is HCD defining "encampment"?

A. HCD is providing the below framework for HHAP 6 Eligible Applicants to identify and document a specific plan to address encampments or encampment zones based on impact, while allowing local jurisdictions the flexibility to apply it in ways that reflect local context and needs.

Encampment generally refers to any location where multiple individuals experiencing unsheltered homelessness have established a place of residence, and where the ongoing presence and conditions of the site result in sustained or significant impacts to health, safety, public access, or infrastructure.

Encampments or encampment zones may exist on public or private land and are typically characterized by the presence of personal belongings, makeshift or semi-permanent structures, and repeated or prolonged habitation.

The defining criteria of an encampment are not based on the number of occupants, but on the degree of impact on:

- **The individuals residing in the encampment**, including exposure to environmental hazards, violence, or lack of access to services and housing;
- **The surrounding community**, including limitations to public access, increased health and safety risks, or strain on public systems;
- **Critical infrastructure and natural resource**s, including blocked rights of way, degraded environmental conditions, or damage to public property.

This definition is intended to support regions in developing data-informed, equitable, and humane responses to encampments by prioritizing interventions based on *impact and vulnerability* rather than solely on size or visibility.

Q 10: Do CoCs, Large Cities, and counties each need to have their own encampment policies?

A: NOFA Section IV.A.3.a. includes the requirement that "each Eligible Applicant in the region has a current and formal policy to address encampments." However, all HHAP 6 regional

partners may include a joint policy commitment in the Regionally Coordinated Homelessness Action Plan to satisfy this requirement. See the sample policy below.

Q 11: If an Eligible Applicant does not have a current formal policy for addressing encampments, by when must the Eligible Applicant adopt a formal policy that complies with the Cal ICH Guidance on Addressing Encampments?

A: If there is no current formal policy for addressing encampments, prior to award, applicants need to describe existing efforts with regard to encampments and commit to follow the Cal ICH Guidance on Addressing Encampments, including either by adopting a compliant policy and including that with the application, or including a commitment to follow the Cal ICH Guidance on Addressing Encampments with the application that can serve as a compliant policy.

Q 12: Could an ERF grantee's successful application be used as its encampment policy?

A: No, an ERF application does not suffice as an encampment policy. An encampment policy must include a commitment to follow the practices described within the Cal ICH Guidance on Addressing Encampments.

Q 13: If we opt to provide an Excel spreadsheet for our encampment data, can each entity within our region submit their encampment data in separate excel attachments, or must we submit one attachment?

A: The upload field in the Cognito application portal allows for multiple uploads.

Large City and County Regional Roles and Responsibilities

Housing Element Compliance

Q 14: Must smaller jurisdictions that do not receive a direct allocation of HHAP 6 have a compliant housing element in order for Eligible Applicants to be eligible for their remainder disbursement?

A. No. Only Large City and county Eligible Applicants within the region must have an adopted housing element that HCD has found substantially compliant to be eligible to receive the remainder HHAP 6 disbursement. Meeting HHAP 6 remainder disbursement eligibility is not dependent on non-Eligible Applicants, or smaller jurisdictions, adopting compliance housing elements.

Per NOFA Section V.B. "In order to be eligible to receive the remaining 50 percent of the HHAP 6 award, **Eligible Applicants** must: [d]emonstrate that it has a compliant housing element as defined in HSC section 65589.9 of the Government Code (Applies to Large City and county Grantees only). **Each Large City and county Grantee within each region** must have a compliant housing element as defined in HSC section 65589.9 of the Government Code before they may receive their HHAP 6 remainder disbursement. The housing element requirement does not apply to CoCs."

Q 15: If a Large City or county Applicant does not have a compliant housing element by the time they submit the application, what is the required date for achieving compliance?

A: All Large City and county Eligible Applicants that do not have a housing element that HCD has found to be substantially compliant at the time of application must provide a timeline with all

relevant milestones to achieve compliance. Milestones include, but are not limited to, submitting revised drafts that address all outstanding findings for HCD's review, submitting required rezones for HCD's review, adopting the housing element, and final review and approval by HCD. You may also reference Application Section 3.a.6., "Housing Element Compliance," for an example timeline and milestones for the appropriate level of detail. The timeline and milestones must meet the satisfaction of HCD's Housing and Homelessness Accountability Results and Partnership (HHARP) Unit. If HCD approves the Large City or county Eligible Applicant's timeline to become housing element compliant, the Eligible Applicant will be eligible to receive the initial disbursement.

Subsequently, in order to be eligible for the second disbursement, Large City and county grantees within the region must have a compliant housing element. HCD will withhold the remaining 50 percent of funds from each grantee out of compliance until the grantee's housing element is found to be compliant by HCD. HCD is available to provide technical assistance to support the regions' efforts to become housing element compliant. Failure to meet all second disbursement requirements by December 31, 2028 will result in the second disbursement being reallocated to other grantees, as detailed in Section VI.C.2. of the NOFA.

Housing Element Implementation

Q 16: If a Large City or county Applicant has not implemented all programs in their adopted housing element and timelines, is there a required date for achieving implementation?

A: The Large City or county Eligible Applicant should make every effort to implement all programs in their adopted housing element on the timelines identified in their housing element before submitting the Regionally Coordinated Homelessness Action Plan. If that is not feasible, the Large City or county Eligible Applicant must submit a specific timeline to implement all housing element programs, as required in Section 3.a.7 of the application ("Housing Element Implementation"), to the satisfaction of HCD's Housing Accountability Unit. If HCD approves the Large City or county Eligible Applicant's timeline to implement all housing element programs, the Eligible Applicant will be eligible to receive the initial disbursement.

Subsequently, in order to be eligible to receive the second disbursement, the Eligible Applicant must describe the progress made or report all housing element programs have been implemented in the update to the Regionally Coordinated Homelessness Action Plan (see Section V.B. of the NOFA), due by January 31, 2027. If HCD concludes that insufficient progress has been made to implement the jurisdiction's housing element programs, the Department may require the region's participating jurisdictions to provide a corrective action plan to the update to the Regionally Coordinated Homelessness Action Plan. HCD may withhold the remaining 50 percent of funds from the grantee until the Department has found the update or the corrective action plan satisfactory. HCD is available to provide technical assistance to support the regions' efforts to comply with the requirements. Failure to meet the second disbursement requirements by December 31, 2028 will result in the second disbursement being reallocated to other Grantees, as detailed in Section VI.C.2. of the NOFA.

Housing Law Violations

Q 17: If a Large City or county Applicant has identified a potential or actual housing law violation, is there a required date by which the applicant must resolve the violation?

A: If Large City or county Eligible Applicant has received a technical assistance or enforcement letter from HCD's Housing Accountability Unit or the California Office of the Attorney General's Housing Justice Team, or is the subject of a legal challenge regarding a potential or actual housing law violation, it should make every effort to resolve the Housing Law Violation before submitting the Regionally Coordinated Homelessness Action Plan. If that is not feasible, the Large City or county Eligible Applicant must submit a specific timeline to resolve the issue, as required in Section 3.a.9 ("Housing Law Violations") of the application, to the satisfaction of HCD's Housing Accountability Unit. If HCD approves the Large City or county Eligible Applicant's timeline to resolve the issue, the Eligible Applicant will be eligible to receive the initial disbursement.

Subsequently, in order to be eligible to receive the second disbursement, the Eligible Applicant must describe the progress made or report that the issue was resolved in the update to the update to the Regionally Coordinated Homelessness Action Plan (see Section V.B. of the NOFA), due by January 31, 2027. If HCD concludes that insufficient progress has been made to resolve the housing law violation, it may require the region's participating jurisdictions to provide a corrective action plan to the update to the Regionally Coordinated Homelessness Action Plan. HCD may withhold the remaining 50 percent of funds from the grantee until the Department has found the update or the corrective action plan satisfactory. HCD is available to provide technical assistance to support the regions' efforts to comply with the requirements. Failure to meet the second disbursement requirements by December 31, 2028 will result in the second disbursement being reallocated to other Grantees, as detailed in Section VI.C.2. of the NOFA.

Surplus Land

Q 18: If a Large City or county Applicant has not created a central inventory of surplus land, is there a required date by which the applicant must create the inventory?

A: State law requires that every county and city create a central inventory of all surplus land and all lands in excess of its foreseeable needs located in urbanized areas and urban clusters by December 31 of each year and must report this information to HCD by April 1 of each year as part of its annual progress report. (See Government Code section 54230.) As such, the Large City or county Eligible Applicant should make every effort to create this central inventory before submitting the Regionally Coordinated Homelessness Action Plan. If that is not feasible, the Large City or county Eligible Applicant must submit a specific timeline to create such an inventory, as required in Section 3.a.10 of the application ("Surplus Land"), to the satisfaction of HCD's Housing Accountability Unit. If HCD approves the Large City or county Eligible Applicant's timeline to create the inventory, the Eligible Applicant will be eligible to receive the initial disbursement.

Subsequently, in order to be eligible to receive the second disbursement, the Eligible Applicant must describe the progress made or report that the inventory has been created in the update to the update to the Regionally Coordinated Homelessness Action Plan (see Section V.B. of the NOFA), due by January 31, 2027. If HCD concludes that insufficient progress has been made to create the inventory, it may require the region's participating jurisdictions to provide a corrective action plan to the update to the Regionally Coordinated Homelessness Action Plan. HCD may withhold the remaining 50 percent of funds from the grantee until the Department has found the update or the corrective action plan satisfactory. HCD is available to provide technical

assistance to support the regions' efforts to comply with the requirements. Failure to meet the second disbursement requirements by December 31, 2028 will result in the second disbursement being reallocated to other Grantees, as detailed in Section VI.C.2. of the NOFA.

Q 19: What if an applicant does not have a central inventory of surplus land or land in excess of foreseeable need because there are no properties which have been declared as surplus. The properties are being used or expected to be used for county purposes. How should the applicant address this in their application?

A: In this case, the applicant may respond "No" and explain the reason for not having a surplus land inventory under the timeline section of the table in their application

b. Sub-Component: System Performance Measures Improvement Plan

Q 20: The application template notes that all items currently being funded through HHAP rounds 1 through 5, as well as all activities proposed to be funded through HHAP 6, must be included as Key Actions in the System Performance Measures Improvement Plan. Do we need to include all completed activities from previous funding rounds as key actions in the improvement plan?

A: Only activities currently being funded by HHAP rounds 2 through 5 need to be included as Key Actions in the System Performance Measures Improvement Plan. Activities funded by HHAP from rounds 2 through 5 that are 1) complete, and 2) fully expended do not need to be included as Key Actions.

Q 21: Is it possible to consolidate the key actions from HHAP 5 to streamline the Regionally Coordinated Homelessness Action Plan for HHAP 6?

A: Yes. In HHAP Round 5 Regionally Coordinated Homelessness Action Plan applicants often had to list key actions multiple times if they impacted more than 1 SPM. In the HHAP 6 Regionally Coordinated Homelessness Action Plan, the Key Actions now dictate the organization of the System Performance Measures Improvement Plan. HCD anticipates consolidation and streamlining of key actions compared to the HHAP 5 regional plan.

4. Required Components - HHAP 6 Funding Plan(s)

Q 1: Do the requirements to Document the Sustainability of the Region's Interim Housing Portfolio and to Document the Sustainability of the Region's Permanent Housing Portfolio include the interim and permanent housing portfolio for just the Eligible Applicants, or for every small jurisdiction in the region?

A: As detailed in Sections IV.4.b. and IV.4.c of the HHAP 6 NOFA, all Eligible Applicants participating within the regional application must Document the Sustainability of the Region's Interim Housing Portfolio. Only regions where one or more participating Eligible Applicant plans to use HHAP 6 to fund New Interim Housing Solutions (aside from those designated for the Youth Set Aside) and/or Non-housing solutions (beyond Administrative Costs and HMIS) are required to Document the Sustainability of the Region's Permanent Housing Portfolio.

For these sections, the housing portfolios should include all interim and, if required, permanent affordable housing within the geographic region. This includes interim housing and permanent affordable housing within smaller jurisdictions in the region. The Regionally Coordinated

Homelessness Action Plan is not just the application to receive HHAP 6 funding - it is intended to capture a complete portfolio of housing resources and help regions analyze their portfolios to achieve housing sustainability.

a. HHAP 6 Proposed Funding Activities

Q 2: Does HHAP 6 have a 50% threshold requirement for funds budgeted towards permanent housing and sustaining existing interim housing solutions as HHAP 5 did, or will this threshold change for HHAP 6?

A: Generally, Eligible Applicants are expected to budget all HHAP 6 funding towards Housing Solutions. If an Eligible Applicant demonstrates they can sustain their existing and proposed Interim Housing and Permanent Housing portfolios within the region, they may be permitted to use up to 50% of HHAP 6 funds on New Interim Housing (beyond New Interim Housing for youth) and/or Non-Housing Solutions. **Note:** Spending on **Administrative Costs** (up to 7% of a grantee's total HHAP 6 allocation) and on **HMIS** (up to 1% of the allocation) **does not count** toward Non-Housing Solutions in determining compliance with the 50% threshold. These costs are treated separately for budgeting purposes and do **not** reduce the amount available for housing-focused activities.

b. Funding Priority Considerations – Document Sustainability of the Region's Interim Housing Portfolio

Q 3: As regions are documenting the sustainability of Interim Housing portfolio through 2029, should they factor in future HHAP or other future state homelessness funding?

A: As regions determine the sustainability of their existing Interim Housing portfolio, they should consider all currently available local, state, and federal funds, including, but not limited to the sources identified in NOFA Section IV.A.3.b.ii, as a means to sustain existing interim housing funding needs within their region. If a gap remains, the region must identify other sources to address the gap. These other sources may include, but are not limited to, proposing new local or regional dedicated funding, directing Behavioral Health Services Act, Permanent Local Housing Allocation (ongoing source), or any other local, state, or federal funding sources that have not yet been dedicated to sustaining the existing portfolio. Regional applicants may also signal intention to apply for appropriated funds that have not yet been made available. Additionally, the Fiscal Year 2025-2026 State Budget is expected to be signed by the Governor by June 30, 2025, and if additional funds are identified there, they may be part of the region's considerations.

Q 4: Does the interim housing portfolio include non-publicly funded interim housing, and/or non-housing first compliant interim housing? Does it include seasonal beds? If there is current interim housing the region does not plan to sustain, do we have to include it in Documenting Sustainability of the Region's Interim Housing Portfolio?

A: "Interim Housing" means any facility whose primary purpose is to provide a temporary shelter for people experiencing homelessness and which does not require occupants to sign leases or occupancy agreements. The interim housing portfolio should include beds within these facilities – both year-round and seasonal, as appropriate. It does not include voucher capacity. Applicants should work with their local CoC to attain and analyze this information. Then the

region should conduct analysis and local decision making when it comes to providing the estimated total capital and operating costs to support the interim housing portfolio. This may include adding capacity, stepping capacity down, or otherwise shifting capacity. The purpose of this section is to support the regions in analyzing their interim housing portfolio to achieve sustainability. The region is not committing to support the exact count or current mix of interim housing identified under "Number of existing interim beds (beds) withing the region" but instead needs to determine and document how they will achieve sustainability of the regions interim housing portfolio.

Q 5: Does the Interim Housing Portfolio need to include all anticipated expenses and revenue through the HHAP 6 grant term?

A: Yes. Per NOFA Section IV.A.4.b.3, the region must provide the total estimated capital and operating costs for the beds (existing and proposed) through FY28/29, and expected funding to support those costs.

c. Funding Priority Considerations – Document Sustainability of the Region's Permanent Housing Portfolio (as applicable)

Q 6: Are we required to Document the Sustainability of the Region's Interim Housing Portfolio and Document the Sustainability of the Region's Permanent Housing Portfolio sections if we are ***not*** proposing to fund any New Interim Housing Solutions (aside from those designated for the Youth Set Aside) or Non-housing Solutions?

A: As detailed in Sections IV.4.b. and IV.4.c of the HHAP 6 NOFA, all Eligible Applicants participating within the regional application must demonstrate that they have dedicated sufficient resources to sustain their region's existing and proposed portfolio of interim housing within the grant term (FY24/25-FY28/29); however, only regions where one or more participating Eligible Applicant plans to use HHAP 6 to fund New Interim Housing Solutions (aside from those designated for the Youth Set Aside) and/or Non-housing solutions (beyond Administrative Costs and HMIS) are required to document the sustainability of the region's permanent housing portfolio.

Q 7: As regions are documenting the sustainability of their Permanent Housing portfolio through 2029, should they factor in future HHAP or other future state homelessness funding?

A: If regions determine they can sustain their existing Interim Housing with available resources at least through 2029, and they wish to create an additional interim housing shelter or spend HHAP 6 funds on non-housing solutions, they must also demonstrate that those funds are not first needed to close gaps in their Permanent Housing Portfolio. As regions determine the sustainability of their Permanent Housing portfolio, they should consider all currently available local, state, and federal funds, including, but not limited to the sources identified in NOFA Section IV.A.3.b.ii, as a means to address the Permanent housing funding needs within their region. If a gap remains, the region must identify other sources to address the gap. These other sources may include, but are not limited to, proposing new local or regional dedicated funding, directing Behavioral Health Services Act, Permanent Local Housing Allocation (ongoing source), or any other local, state, or federal funding sources that have not yet been dedicated to addressing the region's Permanent Housing needs. Regional applicants may also signal intention to apply for appropriated funds that have not yet been made available. Additionally, the Fiscal Year 2025-2026 State Budget is expected to be signed by the Governor by June 30,

2025, and if additional funds are identified there, they may be part of the region's considerations.

Note: Spending on **Administrative Costs** (up to 7% of a grantee's total HHAP 6 allocation) and on **HMIS** (up to 1% of the allocation) **does not count** toward Non-Housing Solutions in determining compliance with the 50% threshold. These costs are treated separately for budgeting purposes and do **not** reduce the amount available for housing-focused activities.

Q 8: Does budgeting HHAP 6 dollars under Administrative Costs and/or HMIS trigger the Sustainability of the Region's Permanent Housing Portfolio?

A: No, Eligible Applicants can dedicate up to 7% of their budget to Administrative Costs and up to 1% of their budget to HMIS without being required to complete the Sustainability of the Region's Permanent Housing Portfolio section of the application.

Q 9: Does documenting the Sustainability of the Region's Permanent Housing Portfolio include sustainability of Rapid Rehousing programs?

A: No. Regions can fund Rapid Rehousing with HHAP funds without documenting the sustainability of those programs through the grant term. NOFA Section IV.A.4.c. outlines the requirements to Document Sustainability of the Region's Permanent Housing Portfolio (if applicable), which include:

1. The total permanent affordable housing developments and units in the region.
2. The total developments at risk of expiring affordability restrictions during the grant term (FY 24/25-28/29) in the region.
3. The total developments proposed, such as those currently seeking permanent housing funding or operations support in the region, which still have a financing or supportive services and operations funding gap.
4. For 2 and 3, identify and describe the funding sources (and amounts) that will realize the estimated capital and operating costs to address the funding gaps or preserve the at-risk developments in the region.

If the region is seeking to use funds for non-housing solutions and/or to open new interim housing, then this information will need be submitted for the region as a whole in Section 4, "HHAP Funding Plan," of the application.

Q 10: NOFA Section IV.A.4.c., "Document Sustainability of the Region's Permanent Housing Portfolio" says that the following can be provided by HCD upon request. How do we applicants request this information?

- The total permanent affordable housing developments and units in the region.
- The total developments at risk of expiring affordability restrictions during the grant term (FY 24/25-28/29) in the region.

A: The majority of the existing permanent multifamily affordable housing development portfolio with funding from HUD, USDA, LIHTC, HCD, and CalHFA is available for viewing through California Housing Partnership's Affordable Housing Map and Benefits Calculator. For information on properties at risk of expiring within the grant term please contact California

Housing Partnership's Danielle Mazzella at dmazzella@chpc.net to request this data, and cc Uvette.Vernon@hcd.ca.gov.

d. Funding Priority Considerations – Document Youth Set Aside Requirement has been met

Q 11: What percentage of our HHAP 6 allocations must be dedicated to the Youth Set Aside in order to meet the minimum Youth Set Aside requirement?

A: Per section IV.A.4.d. of the HHAP 6 NOFA, at least 10 percent of each HHAP 6 allocation must be spent on services for homeless youth, however there are no prohibitions on spending a greater percentage on the Youth Set Aside.

Q 12: If an Eligible Applicant proposes to budget part of its HHAP 6 Funding Plan on New Interim Housing or Non-housing Solutions for youth, would the Eligible Applicant be required to complete the Sustainability of the Region's Permanent Housing Portfolio requirement?

A: No. New Interim Housing or Non-housing Solutions that meet the Youth Set Aside requirement do not require the Eligible Applicant to complete the Sustainability of the Region's Permanent Housing Portfolio requirement. As a reminder, all funding activities that meet the Youth Set Aside requirement must be listed as separate activities in the Budget Plan to clearly denote which activities are intended to support youth.

5. Required Components – Regional Memorandum of Understanding

Q 1: Can regions revise and submit their HHAP 5 MOUs in place of a completely new MOU?

A: Yes, regions may revise and submit their HHAP 5 MOUs provided that the MOUs are updated to reflect the HHAP 6 Regionally Coordinated Homelessness Action Plans. If the region anticipates adjusting the MOU throughout their application development and review, they can submit the draft MOU with their application unsigned, as long as they submit a signed final copy prior to award.

Section V. FUNDS DISBURSEMENT

Q 1: What PIT Count Year was used for HHAP 6 allocations?

A: The 2024 PIT count published by HUD in December 2024.

A. Initial Disbursement

Q 1: If an Eligible Applicant has not met all Initial Disbursement requirements outlined in NOFA Section V.A., can they still receive a HHAP 6 award?

A: If the region meets the criteria necessary for their regional award, they can receive their regional award, but any regional partners that have not met the conditions for initial disbursement will not receive an initial disbursement until:

- They have contractually obligated 100 percent of HHAP rounds 1 through 3.
- They have expended 100 percent of HHAP Round 1 or returned any funds remaining after the 6/30/2025 expenditure deadline.

- They have expended at least 50 percent of their funding and contractually obligated at least 75 percent of their funding from the first disbursement of HHAP Round 4.
- They must be in good standing on reporting for HHAP rounds 1 through 5, including fiscal reporting and reporting into HMIS.

Grantees can check their fiscal progress on the HHAP Fiscal Dashboard and their HMIS compliance on the HHAP website.

Q 2: The HHAP 6 NOFA states that "the Administrative Entity must be in good standing on reporting for HHAP rounds 1 through 5, including fiscal reporting and reporting into HMIS" in order to receive the initial disbursement of HHAP 6 (p. 23-24). What is the definition of "in good standing"?

A: HCD will use the latest HDIS compliance report available to determine whether the Administrative Entity is in good standing to be eligible to receive the initial disbursement of HHAP 6. That means the Administrative Entity as listed in Column D, "Grantee Name (City, County, or CoC)," of the "Compliance Report" tab must have at least one project in HDIS with a correct Grant ID AND Other Funder code, meaning at least one project for the Grant ID is Participating. As of the latest HDIS compliance report available through December 31, 2024, only 43% of HHAP grantees are Participating, or considered in good standing.

If the Administrative Entity's Grant ID does not reflect at least one project as Participating, the Administrative Entity is not in good standing for the purpose of being eligible for the initial disbursement of HHAP 6. Note that there are other requirements HHAP 6 grantees must meet. For a full list of those requirements, see Section V.A. Funds Disbursement, Initial Disbursement (p. 23-24) in the NOFA.

B. Remainder Disbursement

Q 1: Which CA SPMs will be evaluated to determine sufficient progress in order for Eligible Applicants to receive remainder disbursements?

A: In order to be eligible to receive the second disbursement of HHAP 6, grantees must meet all requirements listed in Section V.B. of the NOFA.

One of the requirements is that grantees demonstrate progress on key actions and adequately improved on at least one-half of the region's CA SPMs, based on the most recent CA SPM data available. If those criteria are not met, HCD can require a corrective action plan, as described in Section V.B. of the NOFA, before releasing the remainder disbursement.

The NOFA lists all current CA SPMs in Section IV.A.3.b.i. They are:

1a: Number of people accessing services who are experiencing homelessness.

1b: Number of people experiencing unsheltered homelessness on a single night (unsheltered PIT count).

2: Number of people experiencing homelessness who are accessing services for the first time in the past two years.

3: Number of people exiting homelessness into Permanent Housing.

4: Average length of time that people experienced homelessness while accessing services.

5: Percentage of people who return to homelessness within six months of exiting the homelessness response system to Permanent Housing.

6: Number of people with successful placements from street outreach projects.

The regional CA SPM data is currently updated quarterly by Cal ICH and made available through the CA Open Data Portal. Upon each release HCD creates a summary document with the information showing areas of progress for each region, compared to the relevant baseline. See below for update schedule.

HHAP 4 Baseline	**SPM Data for Comparison Point**	**Expected Release Month (subject to change)**
CY 22	CY24 (January 2024-December 2024)	Available Now
CY 22	April 2024-March 2025	October 2025
CY 22	FY24-25 (July 2024-June 2025)	January 2026
CY 22	October 2024-Sept 2025	Spring 2026
CY 22	CY25 (January 2025-December 2025)	Summer 2026
CY 22	April 2025-March 2026	Fall 2026

HHAP 5 Baseline	**SPM Data for Comparison Point**	**Expected Release Month (subject to change)**
CY 23	CY24 (January 2024-December 2024)	Available Now
CY 23	April 2024-March 2025	October 2025
CY 23	FY24-25 (July 2024-June 2025)	January 2026
CY 23	October 2024-Sept 2025	Spring 2026
CY 23	CY25 (January 2025-December 2025)	Summer 2026
CY 23	April 2025-March 2026	Fall 2026

HHAP 6 Baseline	**SPM Data for Comparison Point**	**Expected Release Month (subject to change)**
CY 24	April 2024-March 2025	October 2025
CY 24	FY24-25 (July 2024-June 2025)	January 2026
CY 24	October 2024-Sept 2025	Spring 2026
CY 24	CY25 (January 2025-December 2025)	Summer 2026
CY 24	April 2025-March 2026	Fall 2026

Q 2: Will HCD approve a remainder disbursement for:

1. Certain regional partners who have compliant housing elements and meet the other requirements outlined in NOFA Section V.B., but who are regional partners with a county or Large City that does not have a compliant housing element?
2. OR will HCD hold the remainder disbursement for the entire region until all grantees within the region are housing element compliant?

A: 1. HCD will disburse the second half of each regional partner's award once they become housing element compliant and meet the other requirements outlined in NOFA Section V.B. As a reminder, the housing element requirement applies only to Large City and county grantees, not to CoC grantees.

The county or Large City regional partner should make every effort to come into housing element compliance following the timeline they provided in Section 3.a.6. of the application. If the county Large City does not come into compliance, then HCD will hold that county or Large City's remainder disbursement. Failure to meet the second disbursement requirements by December 31, 2028 will result in the second disbursement being reallocated to other grantees.

Section VI. MONITORING DOCUMENTATION, AND REPORTING

A. Fiscal Deadlines

Q 1: Since the application was released after January 31 and the application period extended, will the expenditure and obligation deadlines be adjusted to be later?

A: No, all HHAP 6 obligation and expenditure deadlines set in statute and detailed in the NOFA remain the same.

Q 2: When does the HHAP 6 grant term conclude?

A: The HHAP 6 grant term runs through the final expenditure deadline, June 30, 2029, as defined in HHAP 6 statute (HSC 50242(m)).

Q 3: Do the statutory expenditure deadlines apply to interest earned?

A: No, they do not apply to interest earned.