September 13, 2021

CALIFORNIA DEPARTMENT OF SOCIAL SERVICES

EXECUTIVE SUMMARY

The purpose of this letter is to notify All County Welfare Directors and Federally Recognized Tribal Governments in California of funds available for counties and tribes to establish, continue, and expand housing and homelessness assistance through the Housing and Disability Advocacy Program (HDAP). The Budget Act of 2021 (Senate Bill <u>129, Chapter 69, Statutes of 2021</u>) appropriated a total of \$175.0 million for HDAP in Fiscal Year (FY) 2021-22. This letter announces a Noncompetitive Allocation for all fiftyeight (58) counties and two continuing tribes, a set aside for tribal governments, and funds available to support targeted strategic investments.







September 13, 2021

LETTER TO ALL COUNTY WELFARE DIRECTORS AND FEDERALLY RECOGNIZED TRIBAL GOVERNMENTS IN CALIFORNIA

- TO: ALL COUNTY WELFARE DIRECTORS ALL FEDERALLY RECOGINIZED TRIBAL GOVERNMENTS IN CALIFORNIA
- FROM: CORRIN BUCHANAN, ASSISTANT DIRECTOR OF HOUSING AND HOMELESSNESS
- SUBJECT: NOTICE OF FUNDING FOR THE HOUSING AND DISABILITY ADVOCACY PROGRAM
- REFERENCE: <u>SENATE BILL 129, SB 80; ASSEMBLY BILL 135; WELFARE AND</u> INSTITUTIONS CODE (WIC) SECTIONS 8255, 8256 18999, 18999.1, 18999.2, 18999.4, 18999.6; ALL COUNTY LETTER (ACL) 19-104; ACL 19-114; ALL COUNTY WELFARE DIRECTOR LETTER (ACWDL) DATED AUGUST 10, 2020, ACWDL DATED NOVEMBER 1, 2018, ACWDL DATED JANUARY 14, 2021, ACWDL DATED JULY 29, 2021; COUNTY FISCAL LETTER (CFL) NO. 17/18-79, CFL NO. 18/19-25

The purpose of this letter is to notify All County Welfare Directors and Federally Recognized Tribal Governments in California of funds available for counties and tribes to establish, continue, and expand housing and homelessness assistance through the Housing and Disability Advocacy Program (HDAP). This letter also summarizes recent statutory changes enacted through <u>Assembly Bill (AB) 135 (Chapter 85, Statutes of 2021)</u>, outlines continuing HDAP requirements and guidance, and provides new guidance as a result of expanded funding and changes to program statute.

The Budget Act of 2021 (Senate Bill 129, Chapter 69, Statutes of 2021) appropriated a total of \$175.0 million for HDAP for Fiscal Year (FY) 2021-22 with \$25 million to be expended through June 30, 2022 and the remainder to be expended through June 30, 2024. This letter announces Noncompetitive Allocations for all fifty-eight (58) counties and two continuing tribes and an opportunity for counties and tribes to submit

applications for additional funds to support targeted strategic investments. Information on the Tribal Government Set-Aside, as well as further program guidance, will be issued under separate cover.

PROGRAM BACKGROUND

HDAP provides housing supports and disability benefit application assistance and advocacy to people likely eligible for disability benefits and experiencing homelessness or at risk of homelessness. HDAP was created in 2016 with an initial \$43.5 million appropriated in one-time General Fund available over three years, beginning July 1, 2017 through June 30, 2020 and subsequently extended through June 30, 2021, (<u>CFL No. 19/20-77</u>). The Budget Act of 2019 appropriated an additional \$25.0 million for HDAP to continue programming on an ongoing basis. <u>SB 80 (Chapter 27, Statutes of 2019)</u> amended statute relative to HDAP, and CDSS updated program requirements and recommended promising practices accordingly, which are outlined in <u>ACL 19-104</u>. Beginning July 1, 2019, tribes were eligible to receive HDAP funds.

Attachment One provides additional information regarding HDAP requirements and core components. Counties and tribes interested in establishing a new program are encouraged to review this letter, the related ACLs available on the <u>CDSS website</u>, and the references linked at the beginning of this letter to understand the full program scope.

FY 2021-22 BUDGET UPDATES AND USE OF FUNDS

The Budget Act of 2021 (SB 129) appropriated the ongoing, annual HDAP appropriation of \$25.0 million plus \$150.0 million in additional one-time funding for a total of \$175.0 million for HDAP in FY 2021-22.

CDSS will utilize 5 percent of the funds to administer and implement the program to ensure that participating counties and tribes are provided technical assistance and support. The remaining \$166.3 million in total funding is available as outlined in the table and described below:

Funding Use	Funding Amount FY 2021-22	Match Requirement	Expenditure Period	Application
Noncompetitive Allocation	\$133,750,000	Exempt	7/1/21 – 6/30/24	Attachments Four and Five
Tribal Noncompetitive Set-Aside	\$7,500,000	Exempt	7/1/21 – 6/30/24	Forthcoming letter
Targeted Strategic Investments	\$25,000,000	1:1 match up to a total of \$25 million then exempt	\$25.0 million: 7/1/21 – 6/30/22; any additional funds: 7/1/21-6/30/24	Attachment Seven

I. Noncompetitive Allocation

This letter announces the statewide Noncompetitive Allocation of \$133.75 million, out of the \$150.0M in one-time funding, for all fifty-eight (58) counties and two continuing tribes based on a local need methodology established by CDSS. Refer to Attachment Four for the allocation table. These Noncompetitive Allocations are exempt from the dollar-for-dollar match requirements.

Instructions for Accepting Funds

Grantees wishing to accept the Noncompetitive Allocation amount listed in Attachment Four shall review, sign, and return the Director's Certification in Attachment Five. Groups of counties and/or tribes wishing to propose a regional HDAP should consult the guidelines in Attachment Six. Completed certifications should be sent to housing@dss.ca.gov.

CDSS encourages review and acceptance of funds as soon as possible. Grantees that submit a Director's Certification by Friday, October 22, 2021 will receive an allocation letter confirming the award within ten business days of certification receipt. All grantees must submit a Director's Certification by Friday, December 3, 2021 to receive funds. If a county or currently participating tribe is declining an allocation, a Director's Certification should still be submitted indicating that funds are being declined.

Funds that are not accepted by way of a completed Director's Certification on or before Friday, December 3, 2021, including funds declined by a county or currently participating tribe, will be made available to grantees seeking Targeted Strategic Investments, as described in the below section.

Noncompetitive Allocation Methodology

The Noncompetitive Allocation is distributed based on need. The methodology includes the following, in order of weighted importance:

- the percent of the statewide total of individuals experiencing homelessness living in the county (2020 Homelessness Point in Time Count);
- the percent of the statewide population of individuals 65 years or older (American Census Survey 2019); and
- the percent of the statewide total of households with severe cost burden living in the county (i.e., household income less than 50 percent area median income andpaying more than 50 percent of income toward rent or mortgage).

A funding floor equal to \$250,000 or the FY 2020-21 allocation, whichever was greater, was applied to the Noncompetitive Allocations for all 58 counties and two participating tribal grantees.

Noncompetitive Allocation Claiming and Fiscal Information

A statewide County Fiscal Letter (CFL) for noncompetitive awards will be released shortly after close of applications. Claiming instructions for noncompetitive awards are included in Attachment Three.

Note: The match requirements for the Noncompetitive Allocation have been waived; therefore, match instructions relating to Noncompetitive Allocation funds through the current claiming process will be revised. Additional information will be provided under separate cover. Counties participating in the HDAP program as of June 30, 2021 should continue to operate existing programs and will be allowed to claim services back to July 1, 2021 to avoid any break in services.

Proposals for Regional Programs

Groups of counties and/or tribes may request to form a regional HDAP. Regional programs rely on a shared administrative structure or program functions, which can create efficiency in many communities. Counties and tribes in rural communities, communities with a regional Continuum of Care (CoC), grantees with regional Homeless Housing, Assistance and Prevention (HHAP) awards, or neighboring tribal communities may particularly benefit from a regional HDAP.

Considerations and instructions are outlined in Attachment Six. A consultation meeting with CDSS is required before a regional agreement is formalized. Regional allocations are, at maximum, the sum of the Noncompetitive Allocation amounts for participating counties and tribes, plus an additional \$150,000 to incentivize regional collaboration.

II. Tribal Noncompetitive Set-Aside

CDSS will make \$7.5 million available to Federally Recognized Tribal Governments in California interested in establishing an HDAP. These funds are exempt from match requirements. CDSS will release instructions under separate cover for Tribal Governments that are interested in establishing an HDAP.

Note: Tribal Governments with an existing HDAP are included in the Noncompetitive Allocation methodology as described above and listed in Attachment Four.

III. Targeted Strategic Investments

An initial amount of \$25.0 million, with a dollar-for-dollar match requirement, is available to support targeted strategic investments through the application in Attachment Seven. Applications will be awarded on a **first come**, **first served basis and must be submitted by the Director's Certification deadline of Friday, December 3, 2021.** Grantees must submit a Director's Certification before or with the HDAP Targeted Strategic Investment application to be considered. These funds must be used consistent with Welfare and Institutions Code (WIC) sections 18999-18999.6. Refer to Attachment Seven for more information on the purpose and use of Targeted Strategic Investment Funds, applications, match requirements, and claiming information.

If counties and tribes decline Noncompetitive Allocation funding, those funds will be made available for the HDAP Targeted Strategic Investment Funds or through a subsequent allocation. These additional funds, above and beyond the initial \$25.0 million described above, will be exempt from the dollar-for-dollar match requirement. If needed, CDSS will develop a waitlist of eligible proposals. Proposals will be accepted from the waitlist as additional funding from the Noncompetitive Allocation becomes available. If all Targeted Strategic Investment Funds available are not requested by **Friday, December 3, 2021,** CDSS will notify counties and tribes of any additional funds via a subsequent letter.

FY 2021-22 PROGRAM BUDGET AND TRAILER BILL LANGUAGE

The changes summarized below are a result of <u>AB 135 (Chapter 85, Statutes of 2021)</u>, which makes modifications to the HDAP WIC Sections 18999-18999.6. The corresponding attachments outline additional information, including guidance and recommended practices on implementing these programmatic changes. Additional guidance on best practices will be provided in the coming months, aProgrs well as additional support, training, and technical assistance to scale the program and implement changes in eligibility.

I. Changes to Funding Requirements

Section 18999.1(b): Match exemption for one-time funds

Counties and tribes are exempt from the dollar-for-dollar match requirements for the \$133.75 million in one-time funds awarded to grantees between July 1, 2021 and through June 30, 2024 through the Noncompetitive Allocations. The \$7.5 million Tribal Government Set-Aside is also match exempt. The annual, ongoing \$25.0 million HDAP appropriation requires a dollar-for-dollar match and will be used to support targeted strategic investment. Refer to Attachment Seven for more information on Targeted Strategic Investments, including funding availability and match requirements.

Section 18999.4: IAR reimbursement requirement waived

The interim assistance reimbursement (IAR) requirement is waived through June 30, 2024. Grantees may continue collecting IAR, as determined by the local program. However, grantees are reminded that client participation in IAR collection processes must not be a condition of permanent housing tenancy, consistent with Housing First.

II. Expansion of Target Population

Section 18999.2: Serving people at risk of homelessness

Changes to statute clarified that program eligibility includes those at risk of homelessness who have not yet received an eviction notice. In prior grant cycles, HDAP grantees primarily served individuals experiencing chronic homelessness given program funding availability. With the additional program expansion funds, grantees may now have the resources to expand HDAP services (outreach, case management, housing supports and disability benefits advocacy) to include people who are recently homeless or at risk of homelessness, including youth, families, and individuals exiting institutions. See Attachment Two for additional information.

Attachment Two also contains additional guidance related to expanding HDAP services to those at risk of homelessness, as well as broadening the target population for HDAP to include youth, families, and individuals exiting institutions. These expansions may result in significant changes to the program design of local HDAPs and grantees should review this information thoroughly. The attachment also includes expectations for leveraging federal and state rent relief programs (including the California COVID-19 Rent Relief program and the Emergency Rental Assistance Program).

III. Other Changes to HDAP

Section 18999.6: Data reporting requirements

Data reporting requirements were altered to better reflect the disability benefits approval process and align with the client's enrollment timeline in HDAP. Grantees are encouraged to review the statutory changes outlined in WIC 18999.6 to become familiar with the changes to data elements defined in statute. Any applicable changes to grantee data reporting workbooks will be released in subsequent guidance.

Section 18999.1(b): Deadline for regulations

CDSS must adopt HDAP regulations by July 1, 2024. Until regulations are adopted, allcounty letters and similar instruction will have the same force and effect of regulations. CDSS looks forward to working with grantees and stakeholders to develop and adopt program regulations.

Section 10618.8: Use of funds for contracts

CDSS may use program expansion funds for formal evaluation, data collection, and technical assistance contracts. These activities will be contracted and conducted at the state level and in coordination with the legislature, stakeholders, and client advocates. CDSS must report on these contracts and efforts annually to the legislature.

IV. Other Relevant Budget Updates

The FY 2021-22 State Budget also includes investments in programs across the state that may assist HDAP clients, including emergency shelter under Project Roomkey, capital funding under Homekey, the Community Care Expansion program, and several other investments to support people experiencing or at risk of homelessness. Refer to Attachment One for additional information and resources that should be considered as grantees expand and adapt local HDAPs.

Contact the CDSS Housing and Homelessness Branch at 916-651-5155 or housing@dss.ca.gov with questions regarding this letter or HDAP.

Attachments:

- Attachment One: Overview of HDAP and Core Service Components
- Attachment Two: Guidelines on Expansion of Target Population and Prevention Services
- Attachment Three: Fiscal and Budget Considerations
- Attachment Four: FY 2021-22 Noncompetitive Allocation Amounts
- Attachment Five: Director's Certification and Instructions and Funding Conditions
- Attachment Six: Information on Establishing Regional Programs
- Attachment Seven: Instructions and Application for FY 2021-22 HDAP Targeted Strategic Investment Funds.

This attachment provides an overview of HDAP and the core service components of the program. Counties and tribes interested in establishing a new program are encouraged to review this information, related ACLs, and guidance linked throughout this attachment to understand the full scope of the program.

With the exception of items outlined in the FY 2021-22 Program Budget and Trailer Bill Language' section in the main body of this ACWDL, the guidance outlined in this attachment is consistent with previously issued guidance in <u>ACL 19-104</u>. Program requirements are outlined in <u>WIC Sections 18999-18999.6</u> and additional information, including a summary of statutory changes made in 2019 and recommended promising practices, is also outlined in <u>ACL 19-104</u>. Attachment Two provides information specific to the expansion of services to individuals, youth and families at risk of homelessness. CDSS will continue to provide more extensive guidance on program best practices and implementation in the coming months. Contact <u>housing@dss.ca.gov</u> with any questions or to request technical assistance.

I. PROGRAM OVERVIEW

HDAP is a locally administered program, operated by counties, tribes, or groups of counties and tribes, that provides housing supports and disability benefits application assistance and advocacy to people likely eligible for disability benefits.

Program Eligibility

Individuals, youth, and families are eligible for HDAP if they are likely eligible for disability benefits and are:

- A) Chronically homeless;
- B) Homeless; or
- C) At risk of homelessness.

Consistent with homeless assistance best practice, programs should evaluate funding and program capacity to prioritize serving people with the highest needs and vulnerabilities, which should include individuals who are experiencing chronic homelessness or with severe health conditions. Every effort should be made to serve the full population of homeless and chronically homeless individuals who are eligible for HDAP given expanded program funds. An individual does not need to receive General Assistance/General Relief (GA/GR) to qualify and grantees are expected to conduct outreach to people beyond the GA/GR population for this program, as outlined in <u>ACL 19-104</u>.

As described in the 'FY 2021-22 Program Budget and Trailer Bill Language' section in the main body of this ACWDL, CDSS encourages programs to begin serving individuals, youth, and families who are at risk of homelessness or who are recently homeless. This may include youth and families with adults or children who may be eligible for disability benefits. For more information on expanding HDAP to incorporate these target populations and prevention services, see Attachment Two.

Program Design

As required and outlined in <u>ACL 19-104</u>, HDAP is intended to support participants in meeting two important program goals: securing disability benefits and stabilizing in permanent housing. Grantees and their contracted service providers must offer all four of these core components of HDAP concurrently:

- 1. Outreach: Activities geared at identifying need, targeting resources, and/or connecting likely eligible individuals to HDAP services, including screening and assessment activities. These can be conducted by HDAP staff or provided in collaboration with community-based organizations (CBOs), including Homeless Outreach Teams (HOTs). Best practices include face-to-face interaction with, and through trusted messengers of, people experiencing homelessness who are living on streets, in encampments, or temporary shelters; being discharged from jails or prisons, hospitals, rehabilitation facilities; and wherever else people may be located.
- 2. Case management: These activities include the provision of care coordination intended to help clients navigate and address barriers to housing and disability benefits, including connections to Medi-Cal, CalFresh, behavioral health agencies, legal aid, etc. Best practices include regular check-ins and communication, linkages to appropriate supportive services, the tracking of clients' cases, including housing status, disability status, status of other benefits, and any case conferencing notes. Case management should begin at entry to the program and continue throughout until a person is stably housed, helping to coordinate each step of the disability advocacy and housing process. Case management ratios should be between 1:10 and 1:25, depending on local considerations. Note: participation in case management is voluntary and clients should not be penalized, sanctioned, or disenrolled from HDAP due to failure to attend appointments or their inability to meet with a case manager.
- 3. Disability benefits advocacy: Activities shall include seeking any and all disability benefits the client may be eligible to receive as appropriate, including Supplemental Security Income (SSI), Social Security Disability Insurance (SSDI), Social Security Retirement or Survivors Benefits, Veterans' Disability Compensation benefits, and the Cash Assistance Program for Immigrants (CAPI). It may also include filing complete and timely applications and appeals, obtaining and submitting medical evidence, filing appeals and requests for hearings including appeals to the Social Security Appeals Counsel, representing individuals at administrative hearings, establishing good working relationships with the Social Security Administration (SSA) and Disability Determination Services (DDS) and contracting with legal services providers as needed to ensure adequate representation. HDAP services should not be interrupted pending an administrative hearing decision.

It is critical that grantees understand that SSI and SSDI benefits advocacy services must adhere to the Social Security Administration guidelines, <u>20</u> <u>CFR §§ 404.1740</u>, <u>20 CFR §§ 416.1540</u> - <u>Rules of Conduct and standards of</u> <u>responsibility for representatives</u>. As such, it is strongly recommended that HDAP administrators develop relationships with legal aid organizations to assist with initial applications and appeals, as well as ensure representation by attorneys in appeals hearings. Counties and tribes are strongly encouraged to consider the requirements of disability benefits advocacy *before* they begin hiring new advocates and are reminded that CDSS encourages grantees to partner with reputable benefit advocacy partners in the community.

Note: CDSS, in coordination with the technical assistance organization Population Change Institute, will be providing a required training for all current and future HDAP grantees on the importance of understanding the role of a benefits advocate.

4. Housing assistance: HDAP can assist participants in finding and securing interim and permanent housing, maintaining current housing, and stabilizing in new housing. Activities include, but are not limited to, direct financial assistance such as rental subsides, rental arrearages, interim housing, landlord mediation, landlord incentives, landlord outreach, and housing identification and search activities. Refer to <u>ACL19-104</u> for a comprehensive description of housing assistance and allowable costs for HDAP clients.

Housing First

HDAP must operate in accordance with Housing First. <u>WIC Section 8256</u> requires that all state-funded housing programs operate in accordance with the core components of Housing First as enumerated in <u>WIC Section 8255</u> and further outlined in <u>ACL 19-114</u>.

Housing First means that individuals should be connected to housing or housing supports immediately without preconditions, services shall be voluntary, client choice shall be respected, and applicants shall not be rejected on the basis of income, past evictions, substance use, or any other behaviors that may indicate a lack of "housing readiness."

CDSS has developed and previously requested that grantees complete a Housing First Self-Assessment to support grantees in assessing their adherence to and adoption of Housing First, and identify areas for development. CDSS reserves the right to request that grantees complete a Housing First Self-Assessment throughout.the technical assistance process. For example, this may be requested from granteesestablishing new programs or when a Housing First practice requires improvement or refinement. This Housing First Self-Assessment is an important tool for HDAP grantees to use through their continuous quality improvement practices and can be found under Attachment Three of <u>ACWDL dated August 10, 2020</u> and was developed using:

- The Housing First core components in <u>WIC Section 8255;</u>
- <u>The United States Interagency Council on Homelessness (USICH) Housing</u> <u>First checklist</u>
- <u>The Department of Housing and Urban Development (HUD) Housing First</u> <u>Assessment Tool</u>
- <u>The Corporation for Supportive Housing (CSH) checklist</u>

Collaboration and Integration with the Local Health, Behavioral Health and Homeless Response System

CDSS requires HDAP grantees to consult with local public benefit advocacy agencies and their broader homelessness response systems as they develop and implement their HDAP. This includes establishing or continuing to support meaningful partnerships with the local homeless Continuum of Care (CoC), tribal housing authorities, health and behavioral health systems, and other local housing service providers, as appropriate. Grantees are strongly encouraged to partner with CoCs or other regional efforts to create and participate in the homeless and/or homeless youth coordinated entry system(s) (CES).

Grantees are also strongly encouraged to collaborate with other entities, such as child welfare systems, criminal justice systems, medical institutions, emergency response systems, public benefit agencies, legal aid organizations, reentry organizations, family resource centers, local First 5's, advocates for clients, and other systems in order to make the best use of available funding and link clients to necessary services. Information on these collaborations will be requested within program updates. Grantees may use HDAP funds to establish specific positions within the local HDAP to support coordination of these systems.

Racial Equity

CDSS requires grantees to commit to addressing racial disproportionality for people experiencing homelessness and ensuring equitable provision of services for Black and Indigenous individuals and other people of color who are disproportionately impacted by homelessness. Black and Indigenous people experience homelessness at significantly higher rates than whites, largely due to long-standing historical and structural racism. In California, Black people account for 7 percent of the general population, but represent more than 31 percent of people experiencing homelessness. The disproportionality in homelessness is a by-product of systemic inequity – the racism continues to perpetuate disparities in critical areas that impact rates of homelessness, including poverty, segregation/rental housing discrimination, incarceration, and access to health care.

Counties and tribes are encouraged to review the following reports and resources related to racial equity:

Reports

- Racial Inequalities in Homelessness, by the Numbers
- Supporting Partnerships for Anti-Racist Communities (SPARC) Phase One Study Findings
- <u>A Brief Timeline of Race and Homelessness in America</u>
- Report and Recommendations of the Ad Hoc Committee on Black People <u>Experiencing Homelessness</u>

Resources

- Equity-Based Decision-Making Framework
- Framework for an Equitable COVID-19 Homelessness Response
- Advancing Racial Equity through Assessments and Prioritization (HUD)

II. PROGRAM ACCOUNTABILITY

Technical Assistance

Training and technical assistance (TA) will continue to be offered by CDSS to help grantees establish, develop, and improve their programs and to facilitate information-sharing across the HDAP. TA and training opportunities include one-onone calls, training as part of regional or topic-specific cohorts, state-wide learning sessions, in person or virtual learning forums, strategy meetings, process mapping, case conferencing, etc. CDSS may designate specific TA or training as mandatory, including for specific staff, such as program leads.

TA and training topics may include strategies for strengthening outreach, case management, advocacy, housing navigation, prevention services, as well as local workforce development, streamlining administrative efficiencies, advancing equity on a systems level, and improving collaboration with the local homelessness network. CDSS will work with grantees and stakeholders to identify the most critical topics to facilitate program expansion. TA and training may be conducted by CDSS or a technical assistance contractor. Programs may utilize HDAP funds to provide program-specific training in areas identified by the grantee or CDSS to support continuous quality improvement.

Based on feedback from current grantees, CDSS plans to establish cross-program opportunities for TA engagement. For example, CDSS will host joint office hours to address questions across the suite of CDSS funded programs, rather than exclusively program specific meetings. Grantees are welcome and encouraged to provide feedback to CDSS on how we can structure meetings that address the needs of grantees and service providers operating the programs. Please send feedback to housing@dss.ca.gov.

Data Reporting and Integration

Data collection, progress monitoring, and outcome reporting are essential and mandatory elements of the HDAP. Data needs should be considered when deciding on staffing, training, and program design. Successful data integration goes beyond completing program data reports and requires building relationships with HMIS administrators, service providers, and other entities that are part of the data integration process.

Grantees are required to report individual level and aggregate data on a quarterly basis via the HDAP PII report which is to be submitted via the <u>Secure Automated</u> <u>File Exchange (SAFE) website</u>. Additional instructions for the HDAP PII will be released under separate cover. As of July 1, 2021, the HDAP 18 report is no longer required. Grantees may be required to complete and submit additional data as specified by CDSS, and any additional data requirements established by CDSS will be done after consultation with the County Welfare Directors Association of California, tribes, and advocates for clients. Applicants may request additional information about HDAP data reporting requirements by emailing housing@dss.ca.gov.

Effective July 1, 2020, all grantees operating an HDAP are required to ensure participants served by HDAP are entered into their local HMIS. CDSS requires this practice to ensure HDAP is aligned with the broader homelessness field and to build for future data collection efficiencies in HDAP.

If HMIS and program systems are not able to currently support this requirement, please contact CDSS for additional support including a longer-term strategy for HMIS integration. Further, data sharing agreements with HMIS administrators may be required for efforts such as a formal evaluation.

CDSS recommends that counties and tribes collect both the Universal Data Elements (UDEs, items 3.01-3.917) and the Common Data Elements (CDEs, items 4.02-4.20 and W5) in their HMIS for all new HDAP clients that are enrolled. When collecting CDEs, please follow guidance provided by <u>HUD's HMIS Data Standards</u> <u>Manual (Section Four)</u>. HDAP grantees should follow U.S. Housing and Urban Development (HUD) guidance on HMIS project set-up and collect the CDEs that are appropriate for the HDAP project. As a reminder, grantees may use HDAP funds tomodify their local HMIS in order to capture all of the required HDAP data elements.

Grantees must also participate in activities related to any formal HDAP evaluation, such as submitting data, conducting data reviews and cleaning, or participating in interviews and focus groups. Grantees are reminded that they may use HDAP funds to support these requirements related to and in support of a formal evaluation.

Program Planning and Update Requirements

As described in the main body of this ACWDL, CDSS is providing counties and tribes the opportunity to accept Noncompetitive Allocations. Therefore, as a condition of receiving these funds, grantees will be required to provide regular program updates to demonstrate use of program funds consistent with program guidance and requirements. CDSS will request a program update using a state-provided template to be distributed six months after the FY 2021-22 funds are accepted and annually thereafter.

Program Performance and Evaluation

Grantees are expected to regularly measure, monitor, and communicate program impact and performance. Establishing clear targets and collecting data to measure progress is part of this process. For HDAP, programs should consistently track progress on metrics such as:

- Number of participants enrolled
- Number of disability applications submitted
- Percent of HDAP participants with a final disability benefit determination that receive an approval
- Number of individuals housed at program exit
- Number of individuals housed one year after program exit

There are other indicators that may be helpful in evaluating program performance and impact, such as length of time between referral and enrollment, between enrollment and placement in interim housing, or number of participants housed and unhoused at program enrollment. Client stories and other qualitative information can also communicate impact, though should be shared with client consent, dignity, and privacy in highest priority. CDSS will provide further guidance, including through technical assistance, on how to set and monitor program performance indicators.

CDSS will conduct ongoing monitoring of program performance using the data, claiming information, and program updates submitted by grantees. Consistent with evidence-based programming, CDSS aims to utilize outcomes data to inform future funding. Therefore, grantees are encouraged to use data to conduct their own program management, oversight, and continuous quality improvement.

Program Compliance

Should CDSS become aware that a grantee is not operating the HDAP consistent with statutory requirements or formal guidance issued by CDSS, the Department will notify the grantee that they shall amend their program within a specified timeline in order to come into compliance. CDSS will provide technical assistance to support grantees and to ensure that programs are operated consistent with evidence-based

practices and may request more regular program updates to reflect program compliance. CDSS, in consultation with CWDA, reserves the right to reallocate funds if a grantee is unable to comply with program requirements within a reasonable amount of time.

Examples of non-compliance may include, but are not limited to, failing to offer housing support and assistance as described in <u>WIC Section 18999.4</u> and <u>ACL 19-104</u>, or violating housing first requirements as described in <u>WIC Section 8255</u> and <u>8256</u> and further outlined in <u>ACL 19-114</u>.

CDSS acknowledges that program goals and targets including budgeting may be subject to change given the dynamic nature of homeless assistance and benefits advocacy. If a grantee is not able to meet the target of individuals to serve or is not maximizing direct financial assistance, CDSS would offer additional technical assistance to the grantee to help achieve best or promising practices in these areas.

Grantees must notify CDSS in writing at least thirty days in advance of any temporary or permanent interruption or end to HDAP services and operations for any reason, including fully spending their allocation.

III. ADDITIONAL STATE RESOURCES TO SUPPORT HDAP CLIENTS

The <u>FY 2021-22 California State Budget</u> also includes investments in programs across the state that may assist HDAP clients. For more information on funding sources to leverage in support of HDAP, please visit the <u>Homeless Coordination and Financing</u> <u>Council website</u> and reference the <u>Guide to Strategic Use of Key State and Federal</u> <u>Funds</u> document. Grantees are also encouraged to leverage expanded funding, services, and staff made available to other programs within the local Department of Social Services, such as the CalWORKs Housing Support Program, Bringing Families Home, and Home Safe. Additional resources made available within the FY 2021-21 budget that may support HDAP clients are listed below, for reference.

Health and Disability Benefits Resources

- **SSP/CAPI Grant Increases** \$291.3 million General Fund in FY 2021-22 and ongoing to increase grants for <u>State Supplementary Payment</u> (SSP), Cash Assistance Program for Immigrants, and California Veterans Cash Benefits. Future SSP grant increases will be subject to an appropriation. HDAP grantees should monitor these upcoming changes to benefit amounts and plan with participants accordingly, including potential impacts to their monthly budget or ability to afford housing and other needs.
- Behavioral Health Continuum Infrastructure Program The Budget includes \$755.7 million in FY 2021-22, \$1.4 billion in FY 2022-23, and \$220 million in FY 2023-24 for competitive grants to qualified entities to construct, acquire, and rehabilitate real estate assets or to invest in mobile crisis infrastructure to expand the community continuum of behavioral health treatment resources. Grantees should collaborate with the local behavioral health continuum to understand locally available resources for HDAP participants.

CDSS Housing Resources

- **Project Roomkey and Rehousing Strategy** \$142.5 million in one-time General Fund for FY 2021-22 was allocated through <u>ACWDL dated July 29, 2021</u> for continued operation of non-congregate shelter and support of re-housing activities for Project Roomkey participants. Grantees should continue to coordinate closely with Project Roomkey programs to assess potential eligibility for HDAP and assist in re-housing efforts.
- Community Care Expansion (CCE) Program The Budget includes \$805.0 million in FY 2021-22 for the construction, acquisition and/or rehabilitation of projects to preserve or expand adult and senior care facilities to serve people experiencing homelessness or who are at risk of becoming homeless. CDSS will be managing the establishment of this program over the course of the next year and will provide more information on how HDAP participants may be able to access CCE.

Housing Resources from Other State Agencies

- Homekey \$2.75 billion for <u>Homekey</u> will further expand the portfolio of housing by supporting the acquisition and conversion of properties into affordable and supportive housing or interim housing. Grantees should collaborate with their CoC to identify local Homekey operators and identify potential areas of collaboration, such as unit set asides for HDAP participants.
- Homeless Housing, Assistance, and Prevention program (HHAP) The Budget includes \$2.0 billion one-time General Fund to the <u>Homeless</u> <u>Coordinating and Financing Council</u> (HCFC) to assist counties, Continuums of Care, and large cities with addressing homelessness in their communities.
- Supportive Services for Formerly Homeless Veterans \$25.0 million one- time General Fund for the <u>California Department of Veterans Affairs</u> to administera competitive grant program to support aging veterans and veterans with disabilities who have experienced chronic homelessness. This program will provide a higher level of on-site supportive services, such as inhome support to help with habitability, peer specialists to encourage veterans to engage in mentalhealth care, and geriatric social workers to identify behavioral issues related to early onset dementia or similar cognitive issues. This program will support residents in permanent supportive housing projects throughout California, primarily projects supported by <u>Housing and Urban</u> <u>Development–Veterans Administration Supportive Housing</u> (HUD VASH)
- Foster Youth Housing Navigators The Budget includes \$5.0 million General Fund, annually for the support of <u>housing navigators</u> to help young adults aged 18 to 21 secure and maintain housing, with priority given to young adults in the foster care system. Funding is allocated as grants to counties based on each county's percentage of the total statewide number of young adults aged 18 through 21-year-old in foster care.

• Homeless Youth Emergency Services and Housing Programs - The Budget includes \$50.0 million one-time General Fund to support the <u>Homeless Youth</u> <u>Emergency Services and Housing Program</u>, which expands access to housing options and provides crisis intervention and stabilization services to homeless youth.

HDAP eligibility is broadly defined as people likely eligible for disability benefits who are chronically homeless, homeless, or at risk of homelessness. Priority is given to people experiencing chronic homelessness and those relying heavily on government services.

Due to funding availability in prior grant cycles, most HDAP programs primarily served individuals experiencing chronic homelessness. With the additional program expansion funds, grantees may now have the resources to expand HDAP services in two directions. First, grantees may offer homelessness prevention services to those at risk of homelessness, as well as serve people who recently became homeless. Program expectations, definitions, and requirements for homelessness prevention services are outlined throughout this attachment.

Second, grantees are also encouraged to expand services to the below groups, provided that funding does not displace or supplant existing resources:

- Youth, including former foster youth, who may be eligible to receive benefits due to their own eligibility or eligibility of a parent based on a qualifying disability or benefits entitled to them from a parent.
 - Note: Youth who are receiving benefits advocacy through County Child Welfare Agencies may be linked to HDAP housing assistance, as applicable.
- Families that include an individual (including a child) who may be eligible for disability benefits; and
- Individuals who may be eligible for disability benefits and are exiting jails, prisons, correctional facilities, hospitals, or other institutions. This may go beyond the HUD definition of homelessness to include individuals that have resided in an institution for more than 60 or 90 days upon release.
 - Note: This may include assistance with re-instating benefits that were suspended upon incarceration.

Outreach, case management, disability advocacy, and housing supports must still be offered to all HDAP participants, regardless of whether they are homeless or at risk of homelessness. Consistent with homeless assistance best practice, programs should evaluate funding and program capacity during their intake process to give priority to people with the highest needs and vulnerabilities, which should include individuals who are experiencing chronic homelessness or with severe health conditions. More information on prioritization is included in 'Section Three' of this attachment. Further, CDSS recognizes that training and technical assistance to expand to new areas of disability advocacy – such as the benefits advocacy practices for individuals under 18 – may be required to accommodate this shift.

I. <u>SECTION ONE: PLANNING TO INCORPORATE HOMELESSNESS</u> <u>PREVENTION</u>

CDSS encourages programs to expand to serve highly vulnerable individuals, youth, and families who are at risk of homelessness or who are recently homeless. This expansion may significantly impact how grantees design and contract the program. CDSS will be providing additional program guidance, including recommended practices in homelessness prevention, in subsequent letters. Resources on eviction and homelessness prevention are also included in Section Four and Six of this attachment.

Grantees should begin strategizing how to expand HDAP to offer homelessness prevention services; however, if grantees are not familiar with homelessness prevention practices, they are encouraged to review the resources provided within this letter.

Grantees should begin implementing these program changes once they are familiar with homelessness prevention practices, which may also be <u>after</u> the release of subsequent homelessness prevention guidance from CDSS.

To ensure that funding remains prioritized for those with the highest vulnerabilities, CDSS expects that grantees will use the vast majority of funds to support people experiencing homelessness. As a best practice and in an effort to maximize all funding sources, grantees are encouraged to limit overall spending on clients at risk of homelessness to not more than 30 percent of the FY 2021-22 Noncompetitive Allocation. Definitions of homeless and at risk of homelessness are included in Section Three of this attachment.

Note: Individuals or families that will imminently lose housing within 14 days, as defined in <u>ACL 19-104</u>, meet the definition of <u>homeless</u>, as outlined in Section Three of this attachment. Further, grantees should utilize the California COVID-19 Rent Relief Program to support individuals in need of rental assistance to avoid eviction, as described in Section Five.

II. <u>SECTION TWO: TYPES AND TARGETING OF HOMELESSNESS</u> <u>PREVENTION SERVICES</u>

Individuals and families at greater risk of homelessness are more likely to have a previous incidence of homelessness, recent exits from institutional settings, children under two years of age, doubled-up households¹ or not being a leaseholder, recent emergency room use, lack of health insurance, and previous or current involvement in the criminal justice and foster care systems. Households with income below 30 percent or 50 percent of <u>Area Median Income</u> that also face a crisis, such as domestic violence, health problems, or loss of housing, may also be at increased risk of homelessness.²

¹ Doubled-up households are defined as having one or more adults in addition to the head of household and spouse orpartner, such as an adult child living at home, two related or unrelated families residing together, or a parent living withan adult child.

² "Homelessness Prevention: A Review of the Literature." Center for Evidence-based Solutions to Homelessness. January 2019. <u>http://www.evidenceonhomelessness.com/wp-</u>

content/uploads/2019/02/Homelessness_Prevention_Literature_Synthesis.pdf

[&]quot;Preventing Homelessness: Evidence-Based Methods to Screen Adults and Families at Risk of Homelessness in Los Angeles." California Policy Lab. July 2021. <u>https://www.capolicylab.org/wp-content/uploads/2021/07/Evidence-Based-Methods-to-Screen-Adults-and-Families-at-Risk-of-Homelessness-in-Los-Angeles.pdf</u>

Preventative services and assistance are varied and can include any preventative measure that will save a tenancy, help individuals and families regain stability in their current housing, or move and achieve stability in a new housing location. This may include rental or utility arrears, late fee payments, first month's rent and/or security deposits, landlord mediation, repairs, habitability/accessibility improvements, and housing navigation.

While homelessness prevention refers to a broad category of services, research shows that homelessness prevention is more effective when targeted to the people who are most likely to fall into homelessness in the absence of preventative assistance. Among prevention clients, grantees should therefore aim to first serve those at greatest risk of homelessness. Best practices for targeting and prioritization among prevention clients is outlined in greater detail below. CDSS also plans to release additional guidance over the coming months to provide promising practices related to homelessness prevention. Additional resources related to homelessness prevention are also provided in Section Six of this attachment.

III. <u>SECTION THREE: ELIGIBILITY AND PRIORITIZATION FOR</u> <u>HOMELESSNESS PREVENTION</u>

Definition of At Risk of Homelessness

For the purposes of HDAP, a person is defined as "at risk of homelessness" when they:

- are experiencing housing instability that places them at risk of homelessness or unnecessary institutionalization in the absence of HDAP assistance;
- have no subsequent permanent residence secured; and
- lack resources or support networks needed to stabilize their unique housing situation and secure subsequent permanent housing.

This definition of "at risk of homelessness" is inclusive of, but not limited to, the U.S. Department of Housing and Urban Development (HUD) definition of "at risk of homelessness" under <u>24 Code of Federal Regulations section 91.5</u>. This means clients who meet the HUD definition of "at risk of homelessness" shall be deemed "at risk of homelessness" under the definition set out in this section.

Clients shall be allowed to self-attest that they meet the definition of "at risk of homelessness" set out in this section. Grantees shall accept both written and verbal client self-attestations. No additional verification or documentation demonstrating that an individual meets the definition of "at risk of homelessness" is needed; grantees shallnot require further evidence for the purposes of HDAP enrollment. This self- determination is based on the assumption that people who are likely eligible for disability benefits and seeking housing assistance are likely already more vulnerable tohomelessness than the general population.

In some cases, an HDAP outreach or intake worker may have a conversation with an individual or family that expresses concern about their housing stability. These conversations may serve as verbal attestation of being at risk of homelessness. For example, they may be living with someone that pays their rent, but express that this situation is unsustainable and that they do not know where else they can live, and do not have the means to secure alternative housing.

Once a client has met the "at risk of homelessness" definition set out in this section, grantees may assess the client for other criteria indicative of vulnerability related to risk of homelessness for further prioritization purposes.

Examples of housing status descriptions and corresponding definitions are outlined below:

Housing Status	Client example	Definition	Homeless Assistance vs. Prevention Assistance
Homeless	Example 1: Individual living in an encampment Example 2:Individual residing in Project Roomkey	As outlined in <u>ACL 19- 104</u> , HDAP follows the HUD definition of homelessness in <u>24 CFRsection 91.5.</u>	Homeless assistance Participants that fall under this definition of homelessness <u>do not</u> contribute toward spending on prevention

Housing	Client	Definition	Homeless Assistance vs.
Status	example		Prevention Assistance
Imminent risk of homelessness	Individual is staying with a family member but has been asked to leave within two weeks and they do not have the resources or support network to find other housing.	Participants at imminent risk of homelessness are considered homeless , as per HUD's definition of homelessness (24 CFR section 91.5.) and copied below: (2) An individual or family who will imminently lose their primary nighttime residence, provided that: (i) The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance; (ii) No subsequent residence has been identified; and (iii) The individual or family lacks the resources or support networks, e.g., family, friends, faith-based or other social networks needed to obtain other permanent housing;	Homeless assistance Participants that fall under this definition of homelessness <u>do not</u> contribute toward spending on prevention

Housing	Client	Definition	Homeless Assistance vs.
Status	example		Prevention Assistance
At Risk of Homelessness	Example 1: Family has been couch surfing for various months, but identifies concern about the stability of this situation since they will likely need to leave within the next monthand do not have other housing options or resources. Example 2: Individual is exiting a prison where they have been incarcerated for six months. The individual shares with a social worker that they do not have permanent housing identified uponrelease.	A client is "at risk of homelessness" when they: are experiencing housing instability that places them atrisk of homelessness or unnecessary institutionalization in the absence of HDAP assistance; • have no subsequent permanent residence secured;and • lack resources or support networks needed to stabilizetheir unique housing situation and secure subsequent permanent housing. Clients shall be allowed to self-attest, either verbally or written, that they meet this definition. This definition of "at risk of homelessness" is inclusive of, but not limited to, the HUD definition of "at risk of homelessness" under <u>24</u> <u>CFR section 91.5</u> . This means clients who meet the HUD definition of "at risk of homelessness" under <u>24</u> <u>CFR section 91.5</u> . This means clients who meet the HUD definition of "at risk of homelessness" under <u>24</u> cere section <u>91.5</u> . This means clients who meet the HUD definition of "at risk of homelessness" under <u>24</u> cere section <u>91.5</u> . This means clients who meet the HUD definition of "at risk of homelessness" under <u>14</u> deemed "at riskof homelessness" under the definition set out in this section.	Prevention assistance Participants that meet the definition of at risk of homelessness are counted towards spending on prevention

Prioritizing Clients At Risk of Homelessness

If a grantee is unable to serve every client that self-determines they are at risk of homelessness or unnecessary institutionalization, thegrantee is expected to prioritize clients for assistance.

CDSS recommends that priority is given to those who have previously been homeless, those with the greatest medical severity and need, current or previous involvement in the criminal justice or foster care systems, and households with children under two years of age. Grantees are strongly encouraged to use these prioritization factors, or other evidence-based factors that are effective in prioritizing those most at risk of homelessness in their community. Regardless of prioritization factors used, the assessment must be consistent across the scope of the program for populations served. For example, the same prioritization criteria the grantee determines appropriate for youth must be used for all youth served through HDAP. Similarly, the same prioritization criteria that the grantee determines appropriate for older adults must be used for all older adults served through HDAP. Grantees are strongly encouraged to use a simple framework and may not allow individual case managers to determine prioritization on a case by case basis. It is critical that prioritization criteria across each population served (youth, families, and adults without minors) are consistent and not subject to the bias of an individual case manager or staff.

Grantees should include their prioritization framework in written program rules to facilitate consistent application across their program and to assist CDSS in understanding best practices across the state.

Eviction Prevention

Eviction prevention³ is distinct from homelessness prevention in that is it not narrowly targeted to only those households who are at risk of homelessness due to a potential eviction. Some households in receipt of an eviction notice may not be at risk of becoming homeless because they are able to find and secure subsequent permanent housing. Homelessness prevention efforts often include eviction prevention strategies such as short term or one-time financial assistance payments, including payment of back rent, but may also offer more substantial case management or other supportive services.

Eviction prevention strategies for CDSS programs, including HDAP, during COVID-19 are outlined in <u>ACWDL dated January 14, 2021</u>, and information on requirements for HDAP to leverage federal and state rent relief resources is outlined in the next section.

³ Eviction prevention programs often provide financial assistance in the form of rent arrears, court fees and late payment fees. Eviction prevention programs can also provide supportive services such as legalservices, landlord mediation, or other services to help prevent an eviction.

IV. <u>SECTION FOUR: EMERGENCY RENTAL ASSISTANCE</u> <u>PROGRAM/CALIFORNIA COVID-19 RENTAL RELIEF FUNDS</u>

Over \$4.6 billion in funding has been made available to California under the US Department of the Treasury's Emergency Rental Assistance Program (ERAP). The ERAP funds, which were made available to states, local governments, and tribes, can assist households that are unable to pay rent or utilities. ERAP funds administered by the State of California are referred to as the CA COVID-19 Rent Relief Program. For HDAP participants who are behind on rent, grantees should assist participants with accessing ERAP funds before using HDAP funds to pay back rent. Note: this requirement is not intended to impact *eligibility* for HDAP, but is rather a requirement to utilize ERAP funds for rental assistance before HDAP funds are used, when available, and help clients in accessing these funds.

Rent relief under ERAP covers up to 100 percent of unpaid back rent as well as future rent and expenses that a tenant is unable to pay due to COVID-19 impacts. This might include loss of job or reduction in hours, loss of transportation to and from jobs, loss of childcare preventing regular work, increased healthcare or other costs, and other impacts to daily life that result in reduced or no income or increased costs. Rental relief applications can be submitted by landlords, renters, or both. However, a renter must participate for relief funds to be received.

HDAP participants may also benefit from more in-depth application assistance offered through the Local Partner Network (LPN). These partners can meet with participants at their home or another site to walk them through the process, assist with documentation and uploads, and add designees to their account to enable a third-party to help them complete the application. **To access an LPN appointment call 833-687-0967.**

Reference the following resources to learn more and begin an application:

- Visit the <u>COVID-19 Rental Relief Program website</u> for more information on the program or to begin an application.
- Call 833-430-2122 for questions about the program and eligibility
- **Call 833-687-0967** for assistance in a language besides English, or to receive more in-depth assistance in the application process through an LPN.
- For informational brochures on the COVID-19 Rental Relief Program, please visit the <u>CA COVID-19 Rent Relief Toolkit dropbox</u>.

V. SECTION FIVE: REPORTING REQUIREMENTS FOR PREVENTION

Effective prevention programs for individuals at risk of homelessness may require a different set of interventions, outreach efforts, processes, contractors, data collection, and community partners than those established for homeless assistance interventions. Therefore, grantees should think through how the program may need to be adapted to incorporate this new intervention type. Further, grantees should develop internal monitoring systems to track overall spending on prevention.

In the required program updates, grantees will be asked to report on homelessness prevention services, including how those services are being delivered according to best practices. Grantees will also be asked to report on their use of funds for prevention.

VI. SECTION SIX: HOMELESSNESS PREVENTION RESOURCES

For more information on implementing equitable homelessness prevention activities, see:

- Framework for Homelessness Prevention HUD
 - Overview of types of prevention programs and strategies, target population, and considerations for COVID-19.
- Homeless System Response: Prevention to Promote Equity HUD
 - Guide to ensuring equitable access and culturally responsive prevention strategies and monitoring outcomes.
- <u>Homeless System Response: Effective and Efficient Prevention Programs</u> HUD
 - Summary of strategies utilized in innovative homelessness prevention programs and interventions in multiple states
- <u>Homeless System Response: How to Design, Scale, and Fund a</u> <u>Homelessness Prevention Program During COVID-19</u> – HUD
 - Recommended operational steps for planning, developing, implementing, and administering effective homelessness prevention strategies
- <u>Prevent Homelessness</u> United States Interagency Council on Homelessness
 - Overview of crisis intervention and mitigation strategies aimed at reducing the risk of homelessness
- <u>A New Direction: A Framework for Homelessness Prevention</u> Canadian Observatory on Homelessness
 - Overview of where prevention fits into broader housing and homelessness assistance, including how the Canadian housing and homelessness system is designed.
- <u>Homelessness Prevention: A Review of the Literature</u> Center for Evidence-based Solutions to Homelessness
 - Overview of research on what types of interventions are most effective in preventing homelessness, key factors in predicting homelessness, and overview of existing screening models.
- <u>Preventing Homelessness: Evidence-Based Methods to Screen Adults and</u> <u>Families at Risk of Homelessness in Los Angeles</u> – California Policy Lab
 - Recommendations from the California Policy Lab on prevention targeting tools, including risk factors that may indicate risk of homelessness, modifications to make tools more user-friendly, and modifications that could be made for adults and families.

ATTACHMENT THREE: FISCAL AND BUDGET CONSIDERATIONS

I. Budget Guidelines

HDAP grantees are expected to provide outreach, case management, benefits advocacy, and housing assistance to all HDAP clients. Grantees must minimize administrative costs while maximizing direct services and housing related financial assistance. Grantees must budget the program appropriately in order ensure every client has access to adequate benefits advocacy and housing assistance.

The budget categories are defined as follows:

- Administrative costs may include, but are not limited to, program administrative staff (including program supervision and data tracking staff), general administration and costs necessary for the proper administration of the program, data tracking including HMIS licenses, overhead, and program development activities.
- **Direct program service costs** includes case management staff, benefits advocacy staff (including staff that are qualified in building a medical case and legal aid providers to represent clients through the appeals process), housing navigation staff, and other program staff or operational costs not included within administrative costs.
- **Direct financial assistance to support housing** represents all housing related costs paid out on behalf of the participant. This includes costs associated with rental assistance, application fees, security deposits, first and last months' rent, housing rehabilitation and modification costs, interim shelter assistance, move-in costs, landlord incentives, etc.

Grantees will be asked to provide updates on spending for administrative costs, direct program service costs, and direct financial assistance during required program updates. If grantees are not maximizing direct financial assistance or minimizing administrative costs, grantees will be asked to provide an explanation within their program update template, including plans to increase spending on direct financial assistance. CDSS will offer additional technical assistance to the grantee to help achieve best or promising practices in these areas.

II. Flexible Contracting and Administrative Efficiencies

Given that multiple rounds of funding may occur within a fiscal year or the grant period, CDSS strongly encourages grantees to make contracts and Memorandums of Understanding (MOUs) with implementing partners as flexible and easy to amend as possible. Contracts and MOUs may need to be altered to update award amounts, spending timeframes, and eligible activities (such as incorporating prevention services). Prioritizing flexibility will facilitate continued program operations while awaiting staggered funding, especially when transitioning to a new fiscal year and awaiting the finalization of the statewide program budget.

ATTACHMENT THREE: FISCAL AND BUDGET CONSIDERATIONS

Grantees are strongly encouraged to consider strategic contracting with community partners, such as contracting with one implementing partner to deliver housing navigation across several programs with similar housing navigation needs. For example, grantees may utilize a portion of their HDAP allocation in coordination with a portion of their CalWORKs Housing Support Program (HSP), Bringing Families Home, Project Roomkey, Home Safe, or other local, state, or federally funded program awards to provide housing navigation for multiple programs across the community.

Similarly, grantees should strongly consider developing a flexible housing subsidy pool, in which dedicated funds from various housing programs are centralized for planning purposes into a single source to meet a common administrative purpose amongst the programs. On a client services level, costs would be attributable to the specific client and program of which they are a participant and would be claimed accordingly. Flexible subsidy pools allow for greater economies of scale while reducing cross program competition for housing within a community.

For more information on flexible housing subsidy pools, reference:

- <u>Flexible Subsidy Housing Pools Fundamentals</u> U.S. Department of Housing and Urban Development
- History and Takeaways from Los Angeles County's Flexible Housing Subsidy
 Pools The Hilton Foundation

III. Claiming and Match Instructions

Administrative costs for the Noncompetitive Allocation, as described in this ACWDL, should continue to be claimed through the County Expense Claim to Program Code 0956 (HDAP – Administration). Expenditures exceeding the GF allocation will be shifted to county-only funding via State Use Only (SUO) Code 0957 (SUO – HDAP – Admin Overmatch). For additional claiming instructions, please refer to <u>CFL No. 17/18-79</u> and <u>CFL No. 18/19-25</u>.

Note: Claiming instructions will be updated to align with the exemption of match requirements. These instructions will be released under separate cover. Claiming and reimbursement instructions related to the Tribal Set-Aside will be provided under separate cover. Claiming and reimbursement instructions for HDAP Targeted Strategic Investments are included in Attachment Seven.

ATTACHMENT FOUR: FY 2021-22 NONCOMPETITIVE ALLOCATION AMOUNTS

The below table contains the Noncompetitive Allocation amounts for all 58 counties, as well as the two Tribal Governments with an existing HDAP. More information on the allocation methodology is contained in the "FY 2021-22 Budget Updates and Use of Funds" section of the main letter of this ACWDL. To accept the allocations, counties and currently participating tribes must sign and return the Director's Certification in Attachment Five **by Friday, December 3, 2021**. The funding process for Tribal Governments interested in establishing a new HDAP will be provided under separate cover.

County or Participating Tribe	Total Noncompetitive Allocation
Alameda County	\$6,070,869
Alpine County	\$250,000
Amador County	\$250,000
Butte County	\$992,922
Calaveras County	\$250,000
Colusa County	\$250,000
Contra Costa County	\$2,649,735
Del Norte County	\$250,000
El Dorado County	\$625,238
Fresno County	\$2,676,598
Glenn County	\$250,000
Humboldt County	\$1,047,703
Imperial County	\$947,684
Inyo County	\$250,000
Kern County	\$1,691,199
Kings County	\$288,204
Lake County	\$296,671
Lassen County	\$250,000
Los Angeles County	\$46,504,194
Madera County	\$447,942
Marin County	\$981,273
Mariposa County	\$250,000
Mendocino County	\$525,331
Merced County	\$595,539
Modoc County	\$250,000
Mono County	\$250,000
Monterey County	\$1,665,696
Napa County	\$435,866
Nevada County	\$393,011
Orange County	\$7,659,238

ATTACHMENT FOUR: FY 2021-22 NONCOMPETITIVE ALLOCATION AMOUNTS

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	042
	000
Northern Circle Indian Housing Authority \$291,	763
	750,000

County Welfare Directors and Tribal Administrators wishing to accept the funds made available to their county or tribe as listed in Attachment Four shall complete and return this Director's Certification to <u>housing@dss.ca.gov</u> by **Friday**, **December 3**, **2021**. Counties and tribes interested in establishing regional programs should refer to Attachment Six for additional information.

By accepting these funds and signing the certification below, the County Welfare Director or Tribal Administrator agrees to the funding terms and conditions outlined within this letter.

- I. <u>Section One: Contact Information (All grantees complete section a through c below):</u>
- a) Name of County/Tribe: _____
- b) Name of contact person and title:
- c) Contact information (phone and email):_____

II. <u>Section Two: Funding Amount and Program Targets (All grantees complete</u> <u>section a through e below)</u>

Noncompetitive Allocation: A county or tribe may accept the full amount identified within Attachment Four or a portion of these funds. *Select <u>one</u> of the following:*

The county and/or tribe hereby:

- Accepts the <u>total</u> allocation amount as listed in Attachment Four (insert amount below to confirm)
- Accepts <u>only a portion</u> of the allocation amount as listed in Attachment Four, as specified below.

Noncompetitive Allocation Amount accepted:

[Amount county/tribe is accepting]

Targeted Strategic Investments: A county or tribe may request Targeted Strategic Investments (as described in Attachment Seven) at the time they submit the Director's Certification or at a later date, but no later than **Friday, December 3, 2021**. The information submitted below will be used for CDSS planning purposes; Targeted Strategic Investment requests will be reviewed and responses provided by CDSS under separate cover.

Select one of the following:

- County or tribe is requesting HDAP Targeted Strategic Investments alongside this Director's Certification submission.
- County or tribe intends to apply for HDAP Targeted Strategic Investments, but the request is not included in this Director's Certification submission. The county or tribe understands that the Targeted Strategic Investment requests will be reviewed and awarded on a first come first served basis and applications must be submitted no later than Friday, December 3, 2021.
- County or tribe is undecided or does not intend to submit a Targeted Strategic Investments request. The county or tribe understands they may submit a request at a later date, no later than Friday, December 3, 2021.

Expected Clients to Serve: Grantees should assess community need, program capacity, and available resources to estimate the total number of new and continuing HDAP participants expected to be served between July 1, 2021 and June 30, 2024 with the funds accepted through the Noncompetitive Allocation above These targets should not include any additional clients that may be served as a result of HDAP Targeted Strategic Investments. Grantees should estimate the expected number of clients served to the best of their ability. However, these projections are for the purposes of initial program scoping and CDSS expects that grantees will refine these numbers at a later date.

Complete <u>all</u> of the following:

- i. Estimated number of individuals **experiencing homelessness** to receive HDAP services:
- ii. Estimated number of individuals **at risk of homelessness** to receive HDAP homelessness prevention services: _____
- iii. Estimated TOTAL number of individuals to serve in HDAP:
- III. <u>Section Three: Collaboration and Director's Certification of Funding Terms</u> (All grantees complete section a and b below)

Collaboration: HDAP grantees must inform the local housing, homelessness, health, benefit advocacy, and social service networks of the following information:

- Allocation made available to the grantee
- Final award amount accepted by grantee
- HDAP program benefits and eligibility (e.g., Attachment One)
- HDAP program requirements as it relates to collaboration with the CoC, CES, and HMIS (e.g., Attachment One)

Relevant agencies and organizations may include the Continuum of Care (CoC), housing agencies of incorporated cities, health services, behavioral health agencies, public housing authorities, tribal agencies, advocates for clients, emergency response, legal aid, family resource networks, local First 5's, and any other local partners that will be key to local collaboration.

□ A copy of the letter(s) sent to relevant partner agencies within the community and list of recipients is attached. The county or tribe understands that this is a requirement to accept the Noncompetitive Allocation.

Conditions of Funding

I, County Welfare Director or Tribal Agency Director of certify that I will:

[insert name of county/tribe]

- 1) Operate an HDAP consistent with relevant laws, regulations, program guidance, and evidence-based practices, including but not limited to:
 - a) <u>Welfare and Institutions Code (WIC) Sections 18999-18999.6</u>
 - b) All County Letters or similar instruction, including <u>ACL 19-104</u> and <u>ACWDL dated August 10, 2020</u>
 - c) Housing First requirements as enumerated in <u>WIC Section 8255</u> and further outlined in <u>ACL 19-114</u>
 - d) Evidence-based practices in homeless assistance and homeless prevention
 - e) Benefits advocacy guidelines issued by HDAP program guidance and the duties of Authorized Representatives issued by the Social Security Administration, including <u>Rules of Conduct and standards of responsibility</u> <u>for representatives, section 404.1740</u> and <u>section 416.1540</u>
- 2) Actively collaborate with local, state, and federal housing, homelessness and health systems in order to make best use of available funding and link clients to necessary services. I understand that information on these collaborations will be requested within program updates. These collaborating entities may include but are not limited to:
 - a) Continuums of Care and Coordinated Entry Systems
 - b) Behavioral health systems
 - c) Medical institutions and emergency response systems
 - d) Housing authorities
 - e) Public benefit agencies
 - f) Legal aid and benefit advocacy providers

- 3) Collect, track, report and measure relevant program outcomes and engage in continuous data quality improvement, such as:
 - a) Enter clients into HMIS.
 - b) Submit HDAP related program reports, including but not limited to the HDAP PII, as specified by CDSS through an ACL or similar instruction.
 - c) Participate in formal evaluation efforts which may include executing data sharing agreements with the HMIS administrator.
 - d) Set program targets and milestones and report to CDSS on progress at least annually or upon request from CDSS.
- 4) Engage in training, technical assistance, and continuous quality improvement, including but not limited to:
 - a) Program leads attend meetings and trainings required by CDSS.
 - b) Respond to requests for program amendments in order to comply consistent with applicable laws and guidance, as determined by CDSS.
 - c) Actively engage with technical assistance providers, including those contracted by CDSS, to support program growth, expansion, and improvement by attending meetings and trainings and contributing to technical assistance efforts, such as process mapping, program design, and case conferencing exercises.
- 5) Respond to requests for program progress reports, updates, expenditure information, including amount spent on prevention services, administrative costs, direct services and financial assistance, or program assessments as requested by CDSS, including but not limited to:
 - a) For new grantees, implementation updates related to program ramp up at least every six months and then annually, after program implementation and until awarded amount is fully spent.
 - b) For existing grantees, annual implementation updates in accordance with a schedule as determined by CDSS.
 - c) For new and existing grantees, submit more frequent program updates if determined necessary by CDSS due to program performance.
- 6) Maximize spending on direct financial assistance and minimize administrative costs in order to ensure that all HDAP participants are provided housing assistance and benefits advocacy.
- 7) Utilize Emergency Rental Assistance Program/California COVID-19 Rent Relief before HDAP to pay for rental backpay, when applicable.
- 8) Notify CDSS in writing at least 30 days in advance of any temporary or permanent interruption or end to HDAP services and operations for any reason, including fully spending the given allocation.

9) CDSS reserves the right to reallocate HDAP funds should a grantee be out of compliance with applicable laws or guidance issued by CDSS and if CDSS determines it is appropriate or necessary to maximize program impact throughout the state.

certify that _

will administer the

[insert Directors name]

L

[insert County or Tribal name]

HDAP pursuant to the terms outlined above and understand this is a condition of receiving HDAP funds. The information completed within the form and attached are true and correct.

County Welfare Director Signature/ Tribal Administrator Signature Date

IV. <u>Section Four: Declining Funds</u> (Only counties and tribes wishing to decline noncompetitive funds are asked to complete this section.)

Declining Funds – Only complete if the county or tribe DOES NOT wish to accept the Noncompetitive Allocation outlined in Attachment Four.

Counties and tribes that do not wish to accept the Noncompetitive Allocation outlined in Attachment Four are asked to notify CDSS by completing and signing the section immediately below and returning it to <u>housing@dss.ca.gov</u> as soon as possible but no later than **Friday**, **December 3**, **2021**. CDSS will consider the funds declined if no response is provided to CDSS by the county or tribe by **Friday**, **December 3**, **2021**. *Note: counties and tribes accepting funds should not complete this section*.

<u>To decline the funds, check the box below and complete the name and signature of the</u> <u>County Welfare Director/Tribal Administrator.</u>

Decline the entire amount of HDAP Noncompetitive Allocation available to county/tribe.

County Welfare Director Signature/ Tribal Administrator Signature Date

ATTACHMENT SIX: INFORMATION ON ESTABLISHING REGIONAL PROGRAMS

Grantees have the option to establish a regional HDAP program. Counties and tribes in rural communities, communities with a regional CoC, grantees with regional HHAP awards, or neighboring tribal communities may benefit from a regional HDAP. CDSS especially encourages partnerships between counties and tribes, or neighboring tribal grantees.

Regional programs rely on a shared administrative structure or program functions which can create more staffing and resource efficiency in communities with smaller caseloads that may not warrant a full-time program case manager, or in areas where hiring is challenging. Similarly, regions with few benefits advocacy organizations or that are already served by a regional legal aid provider could benefit from a coordinated approach to partnering with these organizations to serve clients across a geographic region.

I. Regional Funding Availability

The amount available for regional programs is equal to the sum of the allocation of each participating county or tribe (as specified in Attachment Four). In addition to the Noncompetitive Allocation and/or proposed Tribal HDAP allocation, CDSS will provide an additional \$150,000 to support and encourage regional programming.

II. Regional Program Agreement, Acceptance of Funds and Regional Director's Certification

Groups of counties and/or tribes interested in forming a <u>regional</u> HDAP should contact CDSS at <u>housing@dss.ca.gov</u> as soon as possible. CDSS will set up an initial conversation to discuss and work through potential program design models and ensure that the participating counties/tribes are in agreement with the requirements of HDAP and the regional partnership. Once an agreement has been made, CDSS will provide the participating counties and/or tribes a Regional Director's Certification, in which participating counties and tribes can certify acknowledgement of program funding terms and requirements. Regional Director's Certifications, signed by all participating counties and tribes, **must be submitted by Friday, December 3, 2021.**

III. Considerations

When discussing a potential regional structure, counties and tribes should consider the following questions:

- What is the combined estimate of HDAP-eligible individual and families in these communities? How many will require preventative services and homelessness assistance?
- How might housing or disability benefits advocacy needs differ in each of the participating communities?

ATTACHMENT SIX: INFORMATION ON ESTABLISHING REGIONAL PROGRAMS

- Will the regional HDAP have a lead grantee?
- What functions, services and assistance will be centralized across the program? Which functions, if any, will remain within each grantee? (ex: programs have one housing navigator but retain independent outreach mechanisms)
- How will regional programs ensure that participants from each community have equal access to HDAP services?
- What methods of communication will be established to ensure that coordination across grantees is streamlined, and that no participants fall through the cracks?
- How can a regional program leverage collaborative partnerships for critical services provided by other county departments or community-based providers, especially for roles with specific professional expertise? Examples include health care, behavioral health care or disability benefits advocacy, or legal representation for disability appeals.

IV. Postponed Regional Program Formation

If counties and tribes are unable to come to agreement prior to the deadline to accept the Noncompetitive Allocation but still wish to establish an HDAP (with a possibility of a future regional program) they <u>must</u> submit the Director's Certification (Attachment Five) no later than **Friday**, **December 3**, **2021**. If a regional structure is desired later after the Director's Certification deadline, CDSS will work with counties and tribes to explore possible options. However, if the county or tribe does not submit the Director's Certification by **Friday**, **December 3**, **2021** to accept the Noncompetitive Allocation, CDSS cannot guarantee funding will be available during FY 2021-22.

ATTACHMENT SEVEN: INSTRUCTIONS AND APPLICATION FOR FY 2021-22 HDAP TARGETED STRATEGIC INVESTMENTS

I. BACKGROUND AND INSTRUCTIONS

Overview of HDAP Targeted Strategic Investments

CDSS recognizes that the additional one-time funds create the opportunity to enhance HDAP program design and service delivery. In the interest of making funds available as soon as possible, an initial \$25.0 million, with a dollar-for-dollar match requirement, has been made available to support Targeted Strategic investments. Additional match-waived funds may be made available at a later date.

Counties and tribes can apply for HDAP Targeted Strategic Investments through the attached application template. Applications will be accepted through **Friday, December 3, 2021** and requests will be funded on a first come, first served basis. To apply for HDAP Targeted Strategic Investments, complete the attached application and submit to housing@dss.ca.gov. A signed FY 2021-22 HDAP Director's Certification must be submitted for an application to be considered complete. Applications will only be considered if a Director's Certification has been signed. Refer to the 'Application Instructions' section below for more information.

Eligibility Criteria

An eligible project must meet the following criteria:

- The proposed initiative is consistent with use of HDAP funds as outlined in <u>WIC</u> <u>Section 18999-18999.6</u> and targets a program area the grantee plans to improve, expand, enhance, or pilot given the availability of additional one-time funds.
- 2. The use of funds for the intended purpose is the most strategic use based on an assessment of local, state or federal funds available in the community. By submitting this request, CDSS expects that the grantee has done due diligence in consulting other funding sources and has determined that HDAP is the most strategic use of funding for this initiative.
- 3. The proposed initiative is evidence-based or consistent with best or promising practices and advances an important goal, such as making a significant impact on ending or preventing homelessness in the community; improving the quality and outcomes of benefits advocacy for people experiencing or at risk of homelessness; improving coordination between housing, homelessness, health, and social services systems; advancing the opportunities of belonging, dignity, justice and joy for all program participants; innovations and systems improvements for more efficient and effective service delivery, etc.

ATTACHMENT SEVEN: INSTRUCTIONS AND APPLICATION FOR FY 2021-22 HDAP TARGETED STRATEGIC INVESTMENTS

Funding Availability

An initial amount of \$25.0 million, with a dollar-for-dollar match requirement, will be made available to support targeted strategic investments. If counties and tribes decline funding from the Noncompetitive Allocation, those funds will also be made available to support targeted strategic investments. These additional funds, above and beyond the initial \$25.0 million described above, will be exempt from the dollar-for-dollar match requirement.

Counties and tribes may request an exemption from the dollar-for-dollar match requirements as part of the below application. Once the \$25.0 million of matched funds become available, CDSS will prioritize requests for match exemptions for counties and tribes who intend to use Targeted Strategic Investments to advance racial equity followed by requests received from tribes or rural communities with lower amounts of state, federal, or local funds available to support people experiencing homelessness.

Submission Instructions

Send completed applications to <u>housing@dss.ca.gov</u> by **Friday**, **December 3**, **2021**. A complete HDAP Targeted Strategic Investment application must include:

- □ A copy of the attached HDAP Targeted Strategic Investments application with all questions in Section One and Section Two completed.
- A proposal narrative attached to the submission, as described in Section Three of the application.
- A completed Director's Certification, either submitted before or alongside the HDAP Targeted Strategic Investments application (Attachment Five)

Applications will be date and time stamped as received upon submission of the proposal. Applications that are received without a Director's Certification will not be accepted.

CDSS Review and Selection Process

Applications will be awarded on a first-come, first-served basis provided that the proposals meet the eligibility criteria described above. If needed, CDSS will request additional information to confirm the proposed project meets the eligibility criteria. CDSS will develop a waitlist of eligible proposals should the Department receive a request for HDAP Targeted Strategic Investments that exceeds the funding available for this purpose. CDSS will award proposals from the waitlist as additional funding becomes available. If additional funding is available after all request for funds are received by Friday, December 3, 2021, CDSS will notify counties and tribes under separate cover.

Award and Reimbursement Process

ATTACHMENT SEVEN: INSTRUCTIONS AND APPLICATION FOR FY 2021-22 HDAP TARGETED STRATEGIC INVESTMENTS

Funds will be awarded to counties and tribes via an HDAP Targeted Strategic Investments award letter beginning in September 2021. Reimbursement of funds will likely be provided through an invoicing process with an invoice template provided by the Department. Counties and tribes have the option of requesting an advance of funds using the invoicing template. Funds that require match will be reported on the invoice template when grantees are requesting reimbursements for eligible costs and must be encumbered no later than June 30, 2022 and liquidated no later than June 30, 2024. Additional information, including the invoicing template, will be provided in the HDAP Targeted Strategic Investments award letter.

APPLICATION FOR FY 2021-22 HDAP TARGETED STRATEGIC INVESTMENTS

I SECTION ONE: FUNDING REQUEST SUMMARY

Complete the questions below summarizing the funding request:

1.	Name of County/Tribe:		
2.	Name of contact person and title:		
3.	Contact information (phone and email):		
4.	Total amount of HDAP Targeted Strategic I	nvestme	nts requested:
5.	Director's Certification Attached:	□Yes	□No
	If no, enter date submitted to CDSS:		

II SECTION TWO: USE OF TARGETED STRATEGIC INVESTMENTS

Complete the chart below indicating the use of funds from the categories below or propose a different use that is consistent with <u>WIC Sections 18999-18999.6</u> and the goals of HDAP outlined in this ACWDL. If requesting a match exemption, write "Exempt" in the 'Match Source and Amount' column. Review the 'Funding Availability' section in the corresponding application instructions for expectations on match funding.

Funding Use	<u>Amount</u>	Match Source and Amount
Develop Program Assessment Tools to Advance Equity		
Examples include funding to assess or evaluate equity in existing assessment tools or initiatives to create new evidence-based assessment tools. CDSS will prioritize match exemptions for this purpose once the statewide match requirement of \$25 million has been met.		
Racial Equity Officer Funds to hire a Racial Equity Officer, staff member, and/or peer navigators who will oversee the planning, implementation, and evaluation of initiatives to embed equity into HDAP programming. CDSS will prioritize match exemptions for this purpose once the statewide match requirement of \$25 million has been met.		

Racial Equity Analysis	
Funding to conduct, enhance, or expand an analysis of racial equity within HDAP programming or local housing and homelessness landscape. Examples include conducting needs and gaps analyses or investing in data supports and training for community-based organizations partnering in the analysis. CDSS will prioritize match exemptions for this purpose once the statewide match requirement of \$25 million has been met.	
Workforce Development and Capacity Building	
Examples include pilot initiatives or innovative ideas to improve staff care and reduce burnout of frontline HDAP staff, efforts to incorporate and fairly compensate people with lived experience of homelessness into decision- making and staffing, or staff training and development to support program expansion.	
Enhanced Legal Aid for Tenants Rights Examples include initiatives to enhance the provision of legal aid support to clients, especially in response to needs such as eviction prevention.	
Disaster Assistance	
Support in responding to or preparing for housing needs of HDAP participants following a disaster, such as wildfire recovery support or health and safety supports during extreme weather events or the COVID-19 pandemic.	

Capitol Operating Subsidy Reserves (COSR)	
Capital reserve fund to be used in housing projects to fund operating costs over a fixed period. A COSR may be provided to the housing developer/owner and may function as a rental subsidy to pay the difference between the cost of operating a unit and the projected rental income. Operating a COSR requires a CDSS invoicing process for reimbursement of funds.	
Local Program Evaluation	
Examine outcomes and impact of the localHDAP program or analyze areas for improvement.	
Data System Development or Enhancement	
Support in data-related training, software, planning, etc. to better support the collection and use of HDAP program data, and especially improved processes to incorporate data into decision-making.	

Support Program Coordination, Enhancements or Improvement	
Strategic efforts, including hiring a specific program coordinator role, to support program	
growth and expansion, administrative	
efficiencies, flexible contracting, continuous quality improvement, engagement with public	
housing authorities, linking to higher-level care placements, integration with CalAIM,	
integration with the behavioral health	
continuum, etc.	
Support for Flexible Housing Subsidy Pools	
Cover staff time, administrative costs, data	
and program management infrastructure, and other efforts to coordinate, implement, or	
operate a flexible housing subsidy pool.	
Support for Formalizing Partnerships	
Initiatives to develop, strengthen, and	
formalize partnerships between the HDAP grantee and other key partners,	
formalize partnerships between the HDAP grantee and other key partners, such as nearby counties, incorporated	
formalize partnerships between the HDAP grantee and other key partners, such as nearby counties, incorporated cities, CoCs, benefit advocacy programs and/or other regional service providers	
formalize partnerships between the HDAP grantee and other key partners, such as nearby counties, incorporated cities, CoCs, benefit advocacy programs	
formalize partnerships between the HDAP grantee and other key partners, such as nearby counties, incorporated cities, CoCs, benefit advocacy programs and/or other regional service providers	
formalize partnerships between the HDAP grantee and other key partners, such as nearby counties, incorporated cities, CoCs, benefit advocacy programs and/or other regional service providers	
formalize partnerships between the HDAP grantee and other key partners, such as nearby counties, incorporated cities, CoCs, benefit advocacy programs and/or other regional service providers such as First 5, etc	
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III SECTION THREE: PROPOSAL NARRATIVE

Attach a narrative document to the submission of this application containing all of the following information:

a) Brief Description of Use Including Timeline and Budget (recommended limit of 1-2 pages)

Explain how the county or tribe intends to use the HDAP Targeted Strategic Investments, including a proposed budget and expected timeline of contract execution (if applicable) and anticipated funding encumbrance and liquidation dates.

b) Expected Outcomes of Use of Funds (recommended limit of 1-2 paragraphs)

Describe the anticipated outcome of the use of these funds. For example, how the HDAP program will be improved or enhanced and how HDAP clients will benefit from this initiative.

c) Other (optional)

Applicants may submit supplemental materials that are related to their request for funds, limited to an additional 10 pages. This is not a requirement and is only provided as an option.