



California Interagency Council on Homelessness

Gavin Newsom, Governor
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To: Members of the California Interagency Council on Homelessness
From: Julie Lo, Executive Officer – Cal ICH
Subject: Process for Approval of Local Homelessness Action Plans and Planned Reports to Council
Date: May 12, 2022

Purpose

This memo is intended to assist Council members as they prepare to provide input and take action on the proposed framework and application review process for the Homeless Housing, Assistance and Prevention (HHAP) Grant Program. This item will be presented at the quarterly Council meeting scheduled on May 31, 2022. Council members will vote to approve the framework, as outlined in this memo, by which Cal ICH staff will review and approve Local Homelessness Actions plans, a requirement of the HHAP Grant Application.

The following is included with this memo for Council member consideration:

- The **criteria** Cal ICH staff will apply to determine if a grantee's submitted Local Homeless Action Plan is sufficient and approved or if an amended Local Homeless Action Plan will be required;
- The specific **considerations and criteria** that will be applied when cities, counties, and CoCs with **overlapping jurisdictions** submit separate applications to ensure collaboration in the planning process;
- The **processes** that Cal ICH staff will implement to approve plans or request revised plans from applicants; and
- The **proposed progress updates that Cal ICH staff will report to Council members** and the public at future Council meetings.

Background

Pursuant to [AB 140 \(Health & Safety Code § 50218.6, et seq.\)](#) signed into law by Governor Gavin Newsom on July 19, 2021, staff at the California Interagency Council on Homelessness (Cal ICH) are responsible for administering Round 3 of the [Homeless Housing, Assistance and Prevention Grant Program](#) (HHAP-3). HHAP-3 provides flexible

state homelessness block-grant funding to California's Continuums of Care (CoCs)¹, large cities², and counties³ to expand local capacity to address immediate homelessness challenges and support regional coordination.

HHAP-3 grantees are required to submit **Local Homelessness Action Plans** as one component of the full grant program application. **The Local Homelessness Action Plans** detail grantees' planned approaches to providing a continuum of homelessness services that strengthen local system capacity. The full application package also requires grantees to describe their local needs and resources, establish measurable performance goals, and describe the strategies they will support with their collective resources, including HHAP-3 funding, in support of addressing their local needs and meeting their performance goals. It is the state's intention that these plans create mutual accountability between the state and its grantees to ensure the plans lead to demonstrable impacts in strategies, resources, and interventions towards addressing homelessness across our state. HHAP-3 also provides the state with an opportunity to review and approve these plans with an eye towards strengthening cross-jurisdictional and regional coordination.

Proposed Criteria

To determine the approval of HHAP-3 applications or to request revisions, Cal ICH staff have developed the following criteria. A full description of these criteria is detailed in *Attachment E* and below are summarized criteria for each component of the application:

Required Elements of the HHAP-3 Local Homelessness Action Plans	Summary of Assessment Criteria
<p>Part I: Landscape Analysis of Needs, Demographics, and Funding Provides an analysis of the number of people experiencing homelessness in the grantee's jurisdiction, existing funding and programs that serve those populations, data on those currently being served, and information on funds currently being used or planned to be used.</p>	<p>Data presented is:</p> <ul style="list-style-type: none"> • Responsive to statutory requirements • Comprehensive and clearly presented • Based upon reliable sources of data

¹ Continuums of Care (CoCs) are established and identified by the United States Department of Housing and Urban Development (HUD)

² Large cities are those with population of 300,000 or more as of January 1, 2020

³ Additionally, in HHAP Round 3, federally recognized tribal governments are eligible to apply for funding through a separate application process through which a set-aside of \$20,000,000 will be awarded. More information about tribal application processes will be provided to the Council at a later date.

Required Elements of the HHAP-3 Local Homelessness Action Plans	Summary of Assessment Criteria
<p>Part II: Outcome Goals and Strategies for Achieving those Goals Identifies and describes outcome goals and strategies for achieving those goals across six performance measures.</p>	<p>Data on outcome goals are:</p> <ul style="list-style-type: none"> • Responsive to statutory requirements • Logically aligned across goals • Focused on driving progress on elements of current performance areas needing improvement • Suitably ambitious for local conditions • Complemented by appropriate, trackable equity-related goals that apply to underserved populations and populations disproportionately impacted by homelessness <p>Strategies for achieving those goals are:</p> <ul style="list-style-type: none"> • Responsive to statutory requirements • Comprehensive and clearly presented • Aligned with best practices and Housing First principles • Reflective of strategies that extend beyond HHAP resources
<p>Part III: Application Narrative Responses Provides additional information on regional coordination, capacity building, and equity related efforts in alignment with local action plan goals and strategies.</p>	<p>Application's narrative responses are:</p> <ul style="list-style-type: none"> • Responsive to statutory requirements and instructions provided • Comprehensive and clearly presented • Aligned with best practices and Housing First principles • Reflective of activities that extend beyond HHAP resources
<p>Part IV: HHAP-3 Funding Plan Provides information and budget documents describing the specific allowable activities to be supported with HHAP-3 funds.</p>	<p>Planned investments of HHAP-3 funding are:</p> <ul style="list-style-type: none"> • Clearly presented • Aligned with best practices and Housing First principles • Reflective of investments that are complementary to investments from other funding sources reflected in landscape analysis of funding • Likely to support progress toward achievement of jurisdiction's outcome goals and associated equity-related goals

In some cases, grantees with overlapping jurisdictions (for example, a CoC and a city within that CoC) will apply separately for HHAP-3 funds. The state conducted outreach and engagement to encourage grantees to apply jointly as one entity to increase shared decision-making and accountability across systems. In the absence of joint applications, Cal ICH will apply additional criteria to the broader criteria applied; applications submitted by entities from overlapping jurisdictions will be assessed as follows:

- **Landscape analyses** are the same or are clearly aligned, reflect shared approaches to analyzing data, and identify funding sources administered by each applicant.
- **Outcome Goals** are shared goals set for the CoC's full geographic area.
- **Equity-related goals** are either the same across or distinct but complementary.
- **Strategies for achieving goals** are the same across the jurisdictions' applications or are clearly complementary and reflective of appropriate areas of focus, priority, and accountability for each jurisdiction.
- **Roles and Responsibilities** among each respective grantee in an overlapping jurisdiction are clear, and consistently depicted in separate applications.
- **Narrative responses** reflect shared information and aligned perspectives on the issues addressed.
- **HHAP-3 Funding Plans** are all complementary and likely to support progress toward achievement of shared outcome goals and associated equity-related goals.

A list of these jurisdictions is provided in *Attachment C*.

Proposed Reporting to be Provided to the Council

Cal ICH staff will provide the Council with progress reports regarding the review and approval of jurisdictions' HHAP-3 applications, including:

- Status reports on applications submitted, notice of awards issued, requests for amended applications issued and resolved, and any deadline extensions provided for extenuating circumstances.
- Summary and analysis of common reasons for requests for amended applications being issued.
- Summary and analysis of the outcome goals established within approved applications.
- Analysis of strategies for achieving outcome goals that could be bolstered through State strategies and activities.
- Summary and analysis of types of programmatic investments included within HHAP-3 funding plans.

- Summary and analysis of quarterly progress reporting that will be generated through the State's Homeless Data Integration System.
- Summary of relevant details pertaining to plan approvals, denials, and anticipated amendments.
- Implementation progress of ancillary activities undertaken by Council staff to report publicly, either through planned Council presentations or published progress updates in narrative form and via data snapshots.

Next Steps

Upon approval of this memo, Cal ICH staff will take the following steps to implement this process:

- Apply criteria as the review process begins for reviewing HHAP-3 applications in alignment with the criteria and processes described.
- Begin preparing tools and documents necessary for the reporting to be provided to Council, as described above, with the first reporting to be provided at the Council meeting on September 1, 2022.
- Plan a discussion with Council members on lessons learned from HHAP grant process and gather their input in planning for HHAP-4.

Attachments

The following attachments provide more details on the information in this memo.

- **Attachment A: HHAP Background and Requirements**, provides a description of the HHAP grant program and its history, eligible applicants, and the application timeline.
- **Attachment B: HHAP-3 Base Allocations**, lists the initial distribution amount to be made to each applicant.
- **Attachment C: List of HHAP-3 Jurisdictions Applying Jointly and Separately**, lists the applicants that are applying jointly within overlapping jurisdictions and the jurisdictions applying separately.
- **Attachment D: Proposed Review Process and Timeframes**, provides details on the process Cal ICH staff will take to review HHAP-3 applications, the additional steps added for applications with overlapping jurisdictions, and timeframes in which staff will complete this work.
- **Attachment E: Detailed Criteria for Assessing and Approving HHAP-3 Applications**, describes the criteria Cal ICH staff will use when reviewing applications to ensure they are comprehensive and effective.