

**Permanent Local Housing Allocation Program Competitive NOFA**  
Notice of Funding Availability Date: June 7, 2021  
Questions and Answers (Q&A)  
Last Updated: July 8, 2021



## **2021 PLHA Competitive Q&A**

This Questions and Answers (Q&A) document represents key information and responses to questions asked by potential applicants for the PLHA Program Competitive NOFA. The questions and answers published below provide clarification and additional detail on the PLHA Program Guidelines, statutory requirements, and application process.

This is the second Q&A document published in preparation for the second year of Competitive funding. This document is posted on the HCD website and responses to the questions are indicated in blue.

For additional questions regarding the PLHA Program Competitive NOFA, please email the PLHA staff at [CPLHA@hcd.ca.gov](mailto:CPLHA@hcd.ca.gov). Answers to questions received in this inbox will be answered via email.

For questions regarding the PLHA Request for Funds Form, or PLHA Budget Revision Form, please email State Grants Management staff at [PLHASGM@hcd.ca.gov](mailto:PLHASGM@hcd.ca.gov). Both forms are available on our PLHA web page.

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## **Application**

1. “New” When we select a program-type activity, the only tabs that apply are Overview, Legislative Contact, and Annual Operating Budget. Is that correct, or are there other tabs we should also complete?  
Answer: It depends on which activity is selected. The appropriate tabs will display along the bottom of the application workbook, and all applicable tabs will need to be completed.
2. Can you clarify on the application for our current program that it’s asking for a *total annual operating budget* or *proposed operating budget* for the program we are applying to receive funding for?  
Answer: This portion of the application is looking for the proposed operating budget.
3. Is it okay to apply for the PLHA formula component and competitive round?  
Answer: Yes, eligible applicants may apply to both NOFA rounds. Eligibility is demonstrated in the appendices of the NOFAs.

## **Eligible Applicant**

1. “New” Are non-profits eligible to apply?  
Answer: No, although for applications that include the development of a Rental Housing Project, the Sponsor must be a co-Applicant with the Non-Entitlement Local Government. Non-profits may apply as co-Applicants in that case.
2. If a County is a Non-Entitlement whose jurisdiction is the unincorporated area, can the County develop a project in a city in the county or provide housing programs to homeless people in a city in the county?  
Answer: The PLHA Guidelines and the Competitive Component NOFA require that eligible activities under the NOFA must take place within the jurisdiction of the Applicant. So, no, the County could not apply for an activity to be carried out in a city within the county.
3. Can the County be the co-applicant for funding to be used in an incorporated City, if the incorporated City is also an eligible applicant and just doesn’t have the capacity to apply or administer the funds?  
Answer: If both the county and the city are eligible (non-entitlement) jurisdictions (see Appendix A of the NOFA), yes they can apply together for program activities only. They must submit a binding agreement setting forth their intention to work together on the application. For applications to develop a project, the developer is required to be a co-applicant with the local jurisdiction, and therefore, the county cannot also be a co-applicant.

4. If a local homeless service entity is requesting that the local government submit a competitive PLHA application for supportive and case management services, can the entity be a Sponsor or Co-Applicant, or would the local government need to apply and, if awarded, then conduct a public procurement process to award a services contract to a sub-recipient?

Answer: Yes, the homeless entity can be co-applicant, but the city has to go through a public process to choose the sub grantee, they should do that before applying. The only reason the homeless entity might be co-applicant is for experience points – we don't require it like we do in a development project, where the sponsor is required to be the co-applicant because they are the entity with the site control and with all of the readiness studies etc.

### **Eligible Activities**

1. “New” Are we able to provide services in multiple unincorporated areas, such as two unincorporated towns with the county?

Answer: Yes, as long as the activity takes place within the jurisdiction of the applicant.

2. “New” What activities are allowed with supportive services?

Answer: These services may include, street outreach, mental health services, emergency health services, employment assistance and job training, life skills training, and substance abuse treatment services.

3. For programs, such as subsistence payments, is there a time limit or other restrictions like with CDBG or ESG?

Answer: Subsistence payments are not an eligible use of CPLHA funds.

4. Can the CPLHA funds be released on an affordable housing project as land acquisition, as long as it is secured with a loan and covenant?

Answer: No, for development projects, CPLHA funds cannot be released until the Department authorizes construction loan closing. Please refer to guidelines section 405(d)(1).

5. Is PLHA competitive funding for rental assistance, specifically helping residents pay for back rent due, an eligible activity?

Answer: Back rent due is not an eligible use of CPLHA funds. Also, the NOFA is limited to either development of new multifamily rental housing or assistance to persons who are experiencing or at-risk of homelessness.

6. To clarify, choosing one “project,” is between rental assistance and case management, correct. Rental assistance or case management could be for multiple programs locally, is this correct?

Answer: If you apply for a program activity, you must choose ONE program activity. For example, you can only apply for EITHER rental assistance OR case management. Please see the application form, which makes this clear.

7. What is the definition for navigation centers?  
Answer: A navigation center provides temporary room and board for persons experiencing homelessness, and case managers who work to connect homeless individuals and families to income, public benefits, health services, permanent housing, or other shelter.
8. Are there navigation centers that do not have shelter/housing on-site?  
Answer: Some navigation centers may not provide as many supportive services on site. Instead, case managers might come to the navigation center to work with their clients out of an office that is available for shared usage. But a navigation center must at least function as an emergency shelter, due to the PLHA statute and guidelines.
9. If rapid rehousing or rental assistance is applied for, is there a cap on the amount that can be spent per household?  
Answer: No, there is no cap.

### **Evaluation Criteria & Points**

1. For Evaluation Criteria points: Can experience be combined between Applicant and Co-Applicant?  
Answer: No, one or the other will have to have the experience required to receive points.
2. What precise data source is required for the Community Need scoring factor?  
Answer: The PLHA Guidelines require use of “Severe Housing Problems” data. The “Severe Housing Problems Overview” data can easily be found for cities in the Query Tool of the CHAS data page, or at the [\*PLHA Competitive Community Need Data/Scoring\*](#) document available on our PLHA web page. While it’s easy to get city level data in this query tool, it is not easy to get county data, so we posted an excel spreadsheet listing the rate of each city’s and each county’s severe housing need and the points resulting from that rate, as a resource on our website.
3. Are the number of households listed in the CHAS data page as “Cost burden not available, no other problems” subtracted from the total number of households, before calculating the rate?  
Answer: Yes, the number of households identified as “Cost burden not available, no other problems” are subtracted from the total number of households before calculating the rate of households experiencing the most severe housing need. So, for example, if you were looking at Farmersville, the total HHs is 2650 and the total for whom cost burden is not available is 85, so the total is  $2650 - 85 = 2565$ . There are 785 HHs with at least one of four severe housing problems, so  $785/2565 = 30.6\%$ .

4. We are planning to work with a non-profit that has sheltering and services experience, at the same time, but not at a single location (services are located a short distance away from the shelter). Since a navigation center has both emergency shelter and services at a single location, would we not be able to get experience points for developing and operating a navigation center?

Answer: Due to the fact that navigation centers are a new concept for serving people experiencing homelessness, the Department will count experience in development and operation of emergency shelters as well as development and operation of navigation centers in the “Demonstrated Capacity” experience point factor.

### **Threshold**

1. “New” What happens if a jurisdiction applies before their housing element deadline, but later falls out of compliance after their HE deadline. Do they only have to be in compliance at the time of application submittal?

Answer: An applicant’s Housing Element compliance is a threshold item. We are currently working with our compliance unit to determine if there will be a grace period.

2. “New” Do rehab projects need to complete the appraisal, market study, title report, asbestos and mold reports?

Answer: Rehab projects will need to demonstrate readiness and demonstrate fiscal integrity by providing all required documentation, except for a Phase I report. The NOFA section Threshold (5)(c) lists the required documentation.

3. Can we submit a draft resolution with the application since our Board of Supervisors will meet after the application deadline, and then submit the final executed version as soon as we have it at hand?

Answer: Yes, a draft resolution may be submitted with the application by the deadline. A draft resolution meaning - only missing the signatures from the Board of Supervisors, and attestation.

### **Readiness Requirements:**

4. Can you elaborate on the requirement to have a commitment of other funding sources?

Answer: The Department requires enforceable funding commitments from the bond lender and all other soft funding sources, but we will count 4% tax credits as committed, even if the sponsor hasn’t yet applied for the allocation. We will only count the 9% tax credits as committed if they were already allocated by TCAC.

5. Do new affordable multi-family projects need to be fully entitled to apply for funding?

Answer: The PLHA Guidelines and the PLHA Competitive NOFA require a “Demonstration of readiness, including site control, land use entitlements, environmental review and commitments of other funding.” This means that project applications must show that the project is significantly ready, but not that it is “shovel ready.” The project sponsor MUST have site control. The application must include the “Local Approvals and Environmental Review Verification” form completed by the local government, showing which approvals and clearances were already granted or were not required. The Department will evaluate whether the project is sufficiently ready based on local approvals status—if, for example, a zoning change is still needed, the project wouldn’t be considered “ready.”

6. If we are applying only for operational funding for a navigation center, such as case management, are we still required to send in the site control documents, environment reports, market studies, etc.?

Answer: No, those documents are only required for the development or rehabilitation of a navigation center.

## **Other**

1. Would operational funds need to be spent within city limits of a city applicant, or can they be used outside of the city as long as it is spent on residents?

Answer: Funds must be spent within the limits of the city.

2. What is the expenditure deadline for the competitive grant?

Answer: For round 1 applicants with standard agreements, the expenditure deadline is March 31, 2024.

3. Although the NOFA lists local governments that are not part of an urban county agreement, where can you find an official list (either by HUD or HCD) that lists all local governments in an urban county agreement?

Answer: Currently, there isn’t an official list, you would have to personally reach out to each county regarding this information.