

## **Housing and Disability Advocacy Program County Agency and Tribal Government Match Funding Requirements**

County agencies and Tribal Governments (Tribe) in receipt of ongoing Housing and Disability Advocacy Program (HDAP) funding are required to match the state HDAP funding on a dollar-for-dollar basis over the award period. The county or Tribe may meet their HDAP match requirement through an expenditure of county or Tribal funds and/or through a contribution of county/Tribal and/or third-party in-kind donations. *These match amounts must be spent on or contributed in direct support of the HDAP.*

For example, if a county or Tribe claims \$500,000 in HDAP state funds, the value of its entire HDAP outlays, including all expenditures and contributions made on the program's behalf, must be \$1,000,000. This document summarizes the county and Tribe match guidelines associated with HDAP, outlines the general match provisions, how in-kind funding may be used as a match, and defines the items prohibited from being used as a match.

In accordance with [Welfare and Institutions Code section 18999.1\(b\)\(3\)](#), county agencies and Tribal governments in receipt of funds provided for HDAP shall supplement and not supplant the level of county and Tribal funding spent on these purposes in Fiscal Year 2015-16. For additional match guidance and related claiming instructions for the HDAP, counties may refer to [County Fiscal Letter \(CFL\) No. 17/18-79](#) and [CFL No. 18/19-25](#).

### **Match Requirements**

Proper documentation should be kept on file at the county or Tribal that submits all HDAP match documentation and expenditure claims. This information must be available at the California Department of Social Services' request for review of compliance with statute and state guidance.

### **General Provisions**

County and Tribe's matching amounts must conform to the following general provisions:

- Verifiable from the County's or Tribe's records.
- Necessary and reasonable for accomplishment of HDAP objectives.
- Allowable under the cost principles outlined in [Subpart E of Title 2 Code of Federal Regulations Part 200](#) to the extent they consist of federal funds.
- Neither state funds nor any funds provided by the county/Tribe as a match to draw down state funds in another program.

### **Expenditure Matches (Cash Matches)**

A direct and exclusive expenditure of county/Tribal funds on the HDAP may be used to meet all or part of a county's/Tribe's match requirements for the HDAP.

The source of county or Tribe's funds used for these expenditures may be the county's or

Tribe's own public funds (including Local Revenue Funds [LRF]), cash donations from third parties (e.g., partner organizations), or independent grants. The use of cash donations and grants should adhere to the following guidelines:

- These funds should be transferred to and spent directly by the county agency or Tribal government exclusively on the HDAP to be considered a county or Tribal expenditure match. Funds spent by a third party on behalf of the HDAP are considered an in-kind donation and must follow the rules for in-kind contributions under this program.
- The third party may place a condition or restriction on the use of funds it donates to the county or Tribe requiring that they be used for the purpose of the HDAP.
- It is permissible for donated funds, if not completely expended by the county or Tribe, to revert to the donor, if this condition is part of the agreement between the donor and the county or Tribe.

It is important to note that an expenditure of funds by the county or Tribe on behalf of another program that is used as match for the HDAP is considered a county or Tribal in-kind match, not an expenditure match.

### **In-Kind Matches**

In-kind contributions/donations of goods, services, and other resources in support of the HDAP may be allowable to meet all or part of the HDAP county or Tribe match requirement. In order for in-kind donations to qualify as an allowable match, they must be substantiated with written documentation provided on the source entity's letterhead and signed and dated by an authorized representative of that entity. Documentation must include:

- Description and value of the donated goods or services.
- Specific date and fiscal year for which the goods or services will be contributed.
- The method used to determine the value of the donation.

### County and Tribe In-Kind Match

As explained above, state funds are not an eligible match source. County or Tribal funds that are used as a match to draw down state funds in another program also may not be used as a match. However, county and Tribal funds (including LRF) that **1) are not used as a match for state funds in another program and 2) are spent on other programs** may be used as an in-kind match, as long as those expenditures are in support of the HDAP. For the purposes of this guidance, "county in-kind match" refers to expenditures internal to the County Welfare Department; expenditures by other county departments in support of the HDAP would be considered a third-party in-kind match.

Likewise, any federal share of expenditures for county or Tribe, state, or federal programs also may be used as an in-kind match, as long as they support the HDAP. Any federal funds used as a match must be expended in a manner consistent with federal regulations and the federal award's terms and conditions.

Potential **federal** funds/grants/awards that may serve as a match for HDAP include, but are not limited to, the following sources:

- Emergency Solutions Grant
- Community Services Block Grant
- Community Development Block Grant
- Whole Person Care
- Continuum of Care
- Housing Choice Voucher
- Family Unification Program
- The Title XIX portions of Adult Protective Services (APS) program expenditures
- The Coronavirus Aid, Relief, and Economic Security (CARES) Act

### *County and Tribe In-Kind Match Examples*

Assuming all other match requirements are met, examples of county and Tribe in-kind contributions that may be eligible as a match for the HDAP include, but are not limited to:

- County/Tribal-funded salaries and administrative costs of General Assistance/General Relief programs, such as caseworker or other staff time, provided to HDAP participants. Note: Other staff time, including the time of staff not solely dedicated to HDAP, such as time spent coordinating with local housing services, or other HDAP-related functions may also be used as match in an amount commensurate with the time spent for HDAP specific clients and activities.
- County or Tribal and federal funds expended under other programs on housing assistance for HDAP participants.

For example:

1. The county or Tribe establishes specific positions dedicated to providing HDAP case management for HDAP participants. The case worker time is funded by the county/Tribe. The value of the time can be used as match.
2. A county or Tribal social worker spends time coordinating with the local housing authority on program participants' case plans and providing information to support housing plan development. Both the LRF (2011 Realignment) and any federal portions of the costs associated with that time can be used as match.
3. An alternative county or Tribal program uses county or Tribal or federal funds on emergency or interim housing (e.g., shelter beds, motel vouchers) for clients served by the HDAP. The value of the housing can be used as a match.

### Third Party In-Kind Match

If the source of the in-kind contribution is a third party, a memorandum of understanding

(MOU), or similar kind of agreement, between the county or Tribe and the third party must be in place prior to the provision of the goods and/or services. The MOU must contain the following elements:

- A commitment to provide the goods/service(s).
- A description of the specific goods/service(s) to be provided.
- The profession of any persons providing service(s) and fair market value of the goods/service(s).
- The timeframe in which the goods/service(s) will be provided.
- The review process or system that will be used to evaluate and document the nature and value of the goods/service(s) as actually provided.

Under an agreement with the county or Tribe, a third party may make an in-kind donation contingent upon the receipt of partial reimbursement for that donation from the county or Tribe. The county or Tribe may consider reimbursement of that amount to the donor as an expenditure under the HDAP, which the county or Tribe may use to draw down state HDAP funds. For example, if a third party were to request reimbursement of half the value of its donation, one half of the total value (the reimbursement) would count as a county/Tribal expenditure eligible to draw down state funds and the other half would count as the match for that expenditure.

#### *Third Party In-Kind Match Examples*

Assuming all other match requirements are met, examples of third-party in-kind contributions that may be eligible as a match for the HDAP include, but are not limited to:

- Use of third-party partner case worker (or other staff) time such as caseworker or other staff time, provided to HDAP participants. Note: Other staff time, including the time of staff not solely dedicated to HDAP, such as time spent coordinating with local housing services, or other HDAP related functions may also be used as match in an amount commensurate with the time spent for HDAP specific clients and activities.
- Third party funds expended on housing assistance for HDAP participants.

For example:

1. The county or Tribe works with a third party to establish specific positions dedicated to providing HDAP case management for HDAP participants. In this example, the case worker time is funded directly by the third party. The value of the time can be used as match.
2. A county or Tribe partners with a third party, and a staff person with the third party spends time coordinating with local housing partners on program participants' case plans and providing information to support housing plan development. The third party's time spent on HDAP participants for the specific purposes of HDAP can be used as match.

3. The county or Tribe secures (or plans to secure) third party in-kind funds for emergency or interim housing (i.e., shelter beds, motel vouchers) for clients served by the HDAP. The value of the housing can be used as a match.