American Recovery and Reinvestment Act Homelessness Prevention and Rapid Re-housing Program



Determining and Documenting HPRP Participant Eligibility



Sponsored by: Office of Special Needs Assistance Programs (SNAPS) U.S. Department of Housing & Urban Development

Partners

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Purpose

Provide grantees and subgrantees with an overview of HUD requirements for determining and documenting participant eligibility, including:

– HPRP eligibility determination

- Income and housing status documentation standards
- HPRP Staff Certification of Eligibility for HPRP Assistance (previously referred to as the Staff Affidavit)

Webinar Format

- Call will last approximately an hour and a half.
- Presenters will walk through presentation material.
- Call audience members are "muted" due to the high number of participants.
- Call will be recorded.

Submitting questions in the webinar

- Audience members who would like to pose a question can do so through the "questions" function found in the "GoToWebinar" toolbar.
- Questions will be responded to directly by HPRP resource advisors standing by.
- We will only be able to answer some questions. If you have a question, please submit it to HUD's Virtual Help Desk at <u>http://hudhre.info/HPRP/</u>

Webinar Materials & Evaluation

Materials referenced during this webinar can be found on HUD's Homelessness Resource Exchange at <u>http://hudhre.info/HPRP/</u>

Evaluation questions to measure the effectiveness of this call will be emailed out following the call to all participants.

Program Assistance Types

Homelessness Prevention

 Prevent individuals and families at risk of homelessness from becoming homeless

Rapid Re-housing (Homeless Assistance)

- Assist persons experiencing homelessness to be quickly re-housed and stabilized
- Persons served under this category must meet the HUD homeless definition.

HUD Eligibility Requirements

Initial Consultation

Required to establish eligibility and appropriate type of assistance.

Income

Must be at or below 50 percent of AMI.

Housing Status

- Is homeless (for rapid re-housing assistance) OR at imminent risk of homelessness (for prevention assistance);
 AND:
- Lacks financial resources and support networks needed to obtain or remain in housing.
- Has no subsequent housing options.

Local Determinants

Grantee can add additional eligibility criteria

Must ensure criteria are applied consistently

HUD will look to see this criteria is documented in a grantee's "Policies and Procedures"

Eligibility vs. Targeting

- Participant eligibility is:
 - Whether participants meet HUD's minimum requirements
- Targeting is:

- Process of determining the target population to serve
- Targeting decisions impact program design and program design decisions impact targeting
- May focus on ...
 - Specific homeless or at-risk sub-populations
 - Households at more imminent risk of homelessness
 - Households served based on program design

Assessment & Eligibility Certification

- Required process for determining and documenting household income and housing status of applicants.
- Updated requirements available on HRE.
- Staff Certification of Eligibility for HPRP Assistance (formerly referred to as "Staff Affidavit") must be completed for each participant and placed in case file.

Eligibility Recertification

- Recertification required every three months.
- Evaluate and document eligibility for HPRP assistance at least every 3 months (Financial Assistance and/or Housing Relocation & Stabilization Services)
 - Eligibility criteria

- Appropriateness
- Evaluate the continuation of services

Participant Eligibility: Rapid Re-housing

- Homeless per HUD HPRP definition (must meet one of the following):
 - Sleeping in emergency shelter
 - Sleeping in place not meant for human habitation
 - Staying in hospital or institution for up to 180 days, but literally homeless immediately prior to entry
 - Graduating from/timing out of transitional housing
 - Victim of domestic violence

Participant Eligibility: Homelessness Prevention

- Household must be at imminent risk of literal homelessness.
 - "Would this individual or family be homeless <u>but for</u> this assistance?"
- Intent is to assist households who are at the <u>greatest risk</u> of becoming literally homeless and requiring emergency shelter.
- Many are recently affected by economic crisis; others have been "precariously housed" and/or homeless for longer.

Participant Eligibility: Homelessness Prevention (cont.)

Possible living situations:

Rented by Applicant

- Doubled up with family or friends
- Hospital or other institution
- Hotels or Motels not paid for by Federal, State or local government or charitable programs

Participant Eligibility: Income

- At or below 50% Area Median Income (AMI)
- AMI: based on state and community and udpated annually: <u>http://www.huduser.org/DATASETS/il.html</u>.
- Income Definition: any money that goes to, or on behalf of, the head of household or spouse (even if temporarily absent) or to any other household member.
 - Includes current gross income of all adult household members and unearned income attributable to a minor (e.g., child support, TANF payments, SSI payment, and other benefits paid on behalf of a minor

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Current Income: income that the household is currently receiving at the time of application for HPRP assistance.

- Income recently terminated should not be included.
- Current income at the three month eligibility recertification also based on the total income the household is receiving at the time of recertification

- HPRP definition contains income "inclusions" (types of income to be counted) and "exclusions" (types of income that are not considered) for all adult members of a household.
- Assets generally not counted except interest and dividend income
 - Assets should be taken into account when determining whether a household has other financial resources sufficient to obtain or maintain housing.

Income Inclusions:

– Earned Income

- Self Employment/Business Income
- Interest & Dividend Income
- Pension/Retirement Income
- Unemployment & Disability Income
- TANF/Public Assistance
- Alimony, Child Support and Foster Care Income
- Armed Forces Income

Income Exclusions:

- Income of Children

- Inheritance and Insurance Income
- Medical Expense Reimbursements
- Income of Live-in Aides
- Disabled Persons
- Student Financial Aid
- Armed Forces Hostile Fire Pay
- Self-Sufficiency Program Income
- Other Income (i.e., temporary, non-recurring or sporadic income)
- Reparations
- Income from full-time students
- Adoption Assistance Payments
- Deferred and Lump Sum Social Security & SSI payments
- Income Tax and Property Tax refunds
- Home Care Assistance
- Other Federal Exclusions

Calculating income

- Annualize based on documented current gross income for household
- Example: \$525 gross wages for most recent two week period x 26 pay periods
 = \$13,650 annual income
- Documentation of calculated income relative to AMI must be kept in participant file

Treatment of Assets

- Cash or material items that can be converted to cash quickly
- HUD has not established requirements related to assets & eligibility, level of assistance
- HUD requires grantees to determine whether an applicant household must spend down its assets and, if so, by how much

Documentation Standards

- Verify and document eligibility prior to providing HPRP assistance
- Maintain documentation in participant case file
- Minimum acceptable types, in order of preference:
 - Written third party
 - Oral third party

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Applicant self-declaration

Determining Acceptable Level of Documentation

- Grantees/subgrantees must make effort to achieve highest standard that is reasonable
 - Dependent on program resources and type of assistance
 - Example: not reasonable to delay assistance for written third party documentation if delay results in literal homelessness occurring
 - Example: reasonable to obtain written third party documentation if assistance ongoing
- Must document when lower standard used

Self-Declaration of Housing Status

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 Self-declaration of housing status for participants who are at-risk of losing housing is acceptable ONLY in very limited circumstances

Must clearly document in case file, including all attempts to obtain third party verification of housing status

Timeliness of Income Documentation

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Documentation should be within 30 days prior to application

Exception: public assistance benefits

- Benefits statement received within past 12 months and reflecting current benefits
- Copy of recent bank statement showing direct deposit also acceptable

HOMELESS

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Emergency shelter

- HMIS record, OR
- Homeless Certification, OR
- Shelter provider letter
- Places not meant for human habitation
 - Homeless Certification, OR
 - Street outreach provider letter, OR
 - Self-declaration of homelessness

HOMELESS

- Hospital or other institution
 - Letter from hospital/other institution, AND
 - HMIS record if previously in shelter, OR
 - Homeless Certification, OR
 - Shelter/outreach provider letter, OR
 - Self-declaration of homelessness
- Transitional Housing
 - Homeless Certification, OR
 - Transitional housing provider letter
- Domestic violence
 - Self-declaration of homelessness

AT-RISK OF HOMELESSNESS

- Rented by Applicant: Non-payment of rent and/or other lease violation
 - Eviction notice or court order
 - Lease or other written occupancy agreement
- Rented by Applicant: Utility non-payment
 - Utility shut-off notice
 - Lease or other written occupancy agreement (must indicate tenant responsibility for utility)

Housing Status Documentation Standards

(listed in order of preference)

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AT-RISK OF HOMELESSNESS

- Rented by Applicant OR Other Housing Occupied by Applicant (i.e. family/friends): Foreclosure on rental property
 - Notice indicating building being foreclosed on
 - Lease or other written occupancy agreement
- Other Housing Occupied by Applicant (family/friends): Eviction by host family/friend
 - Eviction letter
 - Lease or other written occupancy agreement (indicating host family/friend as legal tenant)
 - OR self-declaration *if unable to obtain third party*

Housing Status Documentation Standards

_(listed in order of preference)

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AT-RISK OF HOMELESSNESS

- Rented by Applicant OR Other Housing Occupied by Applicant (i.e. family/friends): Uninhabitable conditions
 - Notice from landlord/property manager, public health, code enforcement, fire marshal, child welfare or other government entity that housing is condemned
 - Lease or other written occupancy agreement
- Owned by Applicant: Foreclosure
 - Foreclosure notice

AT-RISK OF HOMELESSNESS

- Hospital or Other Institution: Institutional discharge
 - Statement from hospital/institution
- Hotel/Motels (not paid for by Fed/State/Local Government or Charities): Non-payment of hotel/motel
 - Self-declaration

Polling Question

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Is an eviction notice alone enough to qualify someone to receive HPRP assistance?

Housing Status Documentation Standards

REQUIRED FOR ALL HPRP APPLICANTS

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Other Subsequent Housing Options

 Assessment form or other documentation (e.g. case notes) of housing options by HPRP case manager or other authorized HPRP staff

Financial Resources and Support Networks

- Assessment of financial resources and support networks by HPRP case manager or other authorized HPRP staff.
- Must include review of current account balances in checking and savings accounts held by applicant household.

Housing Status in HPRP

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When assisted with HPRP, participants maintain the housing status (homeless or at-risk) they had immediately prior to receiving assistance

 If homeless prior to HPRP, still considered homeless while in HPRP

If NOT homeless prior to HPRP (e.g. prevention) then not considered homeless while in HPRP

Income Documentation Standards

36 *(listed in order of preference)*

- Written verification
 - Pay stubs (wages, salary, armed forces income)
 - Statement or benefit notice
 - Court order (alimony, child support)
 - Federal or state tax return
 - Dividend interest statement
 - Other written Verification of Income
 - Name of income source, and applicant name
 - Income amount and frequency
 - Contact information for authorized income source representative
 - Signed and dated by authorized income source representative

Income Documentation Standards (*listed in order of preference*)

- Oral verification
 - Name of income source, and applicant name
 - Income amount and frequency
 - Contact information for authorized income source representative
 - Signed and dated by HPRP staff who obtained oral verification

Self-declaration (only if written/oral verification cannot be obtained)

Polling Question

Is 3rd party documentation acceptable when no written verification available and assistance is needed now to prevent homelessness?

Polling Question

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What website is the best source of information about HPRP?

HPRP Resources on the HRE

HPRP page on HUD HRE: www.hudhre.info/hprp

- HUD-Issued Guidance
- Data Collection and Reporting
- Tools and Templates
- FAQs and Help Desk
- Sign up for HPRP listserv on the HRE.

Save the Date

HUD Conference on Homelessness

September 14-17 - Denver September 27-30 - Atlanta

> Covering topics on: HPRP HEARTH HMIS

Questions? HUDHRE Helpdesk www.HUDHRE.info

Additional Trainings

HPRP 101 (repeated): – Thursday, March 18th at 11am ET HPRP Eligibility Determination and **Documentation:** – Monday, March 15th at 2pm ET – Thursday, March 25th at 11am ET HPRP Reporting: – Tuesday, March 23rd at 2pm ET - Wednesday, March 31st at 11am ET