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

Managing and Monitoring HPRP Subgrantees

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

WEBINAR INFORMATION

PRESENTERS

– Susan Ziff, HUD

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PURPOSE

- Provide grantees and subgrantees with an overview of:
  - Managing Subgrantees
  - Monitoring Subgrantees
  - Areas for Review
  - Helpful Tips and Resources

FORMAT

- Call will last approximately 90 minutes
- Presenters will walk through the material and then answer questions posed by the moderator
- All callers are "muted" due to the high number of participants
- Call will be recorded for future use and made available for viewing/download

Submitting Questions During the Webinar…

- Audience members who would like to pose a question can do so via the "questions" function in the "Go to Webinar" toolbar
- Questions will be responded to directly by HPRP resource advisors standing by
- We will not have time to answer every question. If your question is not answered, please submit it to HUD's Virtual Help Desk at http://hudhre.info/HPRP

Materials and Evaluation

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

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

MANAGING SUBGRANTEES

HPRP Oversight

- HPRP is time-limited American Recovery and Reinvestment Act (ARRA) program
- The program is under scrutiny to:
  - Spend funds efficiently and effectively
  - Ensure compliance with HPRP requirements
  - Achieve results
  - Document all of the above

HPRP Oversight

- To ensure success:
  - HUD manages and monitors grantees
  - Grantees manage and monitor subgrantees
  - Subgrantees manage and monitor any
  - sub-subgrantees

Subgrantee Selection

- State HPRP grantees were required to subgrant funds for all activities except administration to a subgrantee
- Metropolitan City/Urban County grantees can directly carry out eligible activities
- All grantees may distribute all or part of their grant amounts to private non-profits
- Grantees could award funds to subgrantees outside of their jurisdiction

Written Subgrant Agreements

- Legally required
- Management tool for both parties
- Establish clear expectations
- Establish administrative requirements
- Agreement could include:
  - Reporting requirements (APR, QPR, FederalReporting.gov)
  - Other HPRP requirements, such as audit compliance, habitability standards, lead-based paint, HMIS

Subgrantee vs. Vendor

- Subgrantee:
  - Private non-profit org or local government
  - All terms of federal award transfer to subgrantees; they are responsible for ensuring that all HPRP activities comply with the Notice
- Vendor:
  - Agreement to provide specific goods/services to grantee/subgrantee required for conduct of HPRP
  - Vendors are subject to the terms of the procurement/contract, not necessarily the HPRP grant agreement

MONITORING SUBGRANTEES

Monitoring

- Subgrantee monitoring is critical:
  - Reinforces accountability
  - Provides for continuous improvement
  - Required by HPRP Notice
- Monitoring goals should:
  - Improve program performance
  - Improve financial performance
  - Ensure regulatory compliance in all areas

Monitoring: Effective Strategies

- Create your own process
- Build open communications & cooperative relationships (i.e. avoid "gotcha" environment)
- Conduct ongoing/recurrent reviews
- Highlight good performance issues as well as areas that need improvement

Monitoring: Developing a Process

- Establish a monitoring plan & schedule
  - Identify subgrantee, staff assigned, and date(s) of visit for each subgrantee
  - Document the plan in writing and ensure review by relevant grantee staff
  - Base plan on your "risk assessment"
- Use common set of tools (e.g., interview guides, file checklists, letter templates)
  - Develop boilerplate language for consistency among different monitors

Monitoring: Key Questions for Developing a Risk Assessment

- New to administering federal grants?
- New to prevention/re-housing activities?
- Key staff turnover?
- Previous compliance or performance concerns?
- Registered complaints by clients, other agencies and/or media?
- Problems with accuracy or timeliness of invoicing?
- Administering grants from multiple grantees?

Monitoring: Preparing for On-Site Visits

- Monitoring staff orientation and training:
  - Don’t send new staff by themselves
  - Don’t be too informal on site
- Review important documents:
  - Subgrantee agreements
  - QPRs and FederalReporting.gov reports
  - Financial reports
  - Any additional documents (e.g. policy and procedure documents)

On-site Monitoring: Five Recommended Steps

1. Written Notification
2. Entrance Conference
3. Documentation Review and Analysis
4. Exit Conference
5. Monitoring Letter

On-site Monitoring: Five Recommended Steps

1. Written Notification
   - Sent to the appropriate person (Agency or Program Director)
   - Defines staff conducting monitoring, subgrantee staff requested to participate
   - What program areas will be monitored
   - When and how long it will take
   - Office space needs, documents needed
   - Outline the process (i.e. the steps)

On-site Monitoring: Five Recommended Steps

2. The Entrance Conference
   - Involve key staff
   - Describe what will occur, your process, and answer questions
   - Understand subgrantee staff roles, program activities, and how program is implemented
   - Make it clear that this is not a “gotcha” opportunity but that this is a HUD requirement

On-site Monitoring: Five Recommended Steps

3. Documentation Review
   - Only serving eligible participants?
   - Operating according to established policies and procedures?
   - Staffing and program capacity (this can include interviews with staff)?
   - Tips for Documentation Review:
     - Use checklists and write notes
     - Choose a randomized sample of:
       - case files (contain client information)
       - financial information

On-site Monitoring: Five Recommended Steps

4. Exit Conference
   – Invite key subgrantee staff
   – Alert subgrantee to issues found
   – Provide opportunity for immediate corrections
   – Obtain additional information
   – Listen to what they may already be doing to correct problems

On-site Monitoring: Five Recommended Steps

5. Monitoring Letter
   - Officially address the conclusions from the review including the severity of the conclusions
   - Cite the standard (the regulation or provision in the agreement)
   - Describe the corrective action(s) expected with established deadlines
   - Include feedback from staff interviews
   - Point out positive observations
   - Note needed areas for technical assistance
   - Maintain in the subgrantee's file

AREAS FOR REVIEW

Areas for Review:

- Participant Eligibility
- Eligible Activities
- Unit Requirements
- Financial Management
- Data Collection and Reporting
- Other Federal Requirements

Areas for Review: Participant Eligibility

- Are they serving eligible participants?
  - Household must receive initial consultation
  - Household must be at or below 50% of AMI
  - Household must be either homeless or at imminent risk of homelessness and meet both of the following conditions:
    - (a) no appropriate subsequent housing options have been identified;
    - (b) the household lacks the financial resources; AND
    - (c) support networks needed to obtain/remain in its existing housing.

Areas for Review: Participant Eligibility

- Initial Consultation
  - HPRP assistance should be "needs-based."
  - Appropriate type and level of assistance cannot be determined without the consultation.
  - Look for:
    - Case file notes describing client's situation, barriers, needs.
    - Housing stabilization plan.

Areas for Review: Participant Eligibility

- Income Requirement
  - Is income being calculated correctly?
  - Does grantee have appropriate documentation?
    - Written Third Party (employer, SSA, etc.)
    - Oral Third Party (by phone or in person)
    - Self-declaration (affidavit reported by household)
  - When a "lower" documentation standard is used, does the grantee have notes indicating why?

Areas for Review: Participant Eligibility

- Housing Status Requirement:
  - Literally Homeless, per HUD definition (for Rapid Re-housing)
  - At Imminent Risk (for Homelessness Prevention)
- Documentation:
  - Varies based on situation of client
  - Refer to HPRP Eligibility Determination and Documentation Guidance
  - Eviction notice and lease required

Areas for Review: Participant Eligibility

- "But For" Rule
  - Does case file demonstrate that the case manager has reviewed with client housing options, support networks, and other financial resources?
- Intent behind this rule is to ensure resources are used effectively and efficiently
  - NOT to create barriers to people in need of emergency assistance.

Areas for Review: Participant Eligibility

- Staff Certification of Eligibility for HPRP Assistance Form
  - Required from 11/01/09 and beyond
- Ongoing eligibility assessment every 3 months
  - Required for clients receiving Financial Assistance and/or Housing Relocation & Stabilization Services
  - Assess continued eligibility and need

Areas for Review: Eligible Activities

- Financial Assistance
  - Rental Assistance/Arrears
  - Utility Assistance/Arrears
  - Security Deposits
  - Utility Deposits
  - Moving Cost Assistance
  - Hotel/Motel Vouchers (limited use)

Areas for Review: Eligible Activities

- Housing Relocation and Stabilization Services
  - Case Management
  - Outreach and Engagement
  - Housing Search and Placement
  - Legal Services related to housing
  - Credit Repair

Areas for Review: Unit Requirements

- Rent Reasonableness
  - Different than FMR
  - Grantee must establish policy for determining/documenting rent reasonableness
  - Assistance cannot be provided for units that do not meet rent reasonableness standard
- Lease Requirement
  - Written lease or occupancy agreement required
  - Must identify applicant as tenant, landlord as payee, property location, rent amount, term.
  - Must be signed and dated by both parties.

Areas for Review: Unit Requirements

- Housing Habitability Determination
  - Required any time a participant is receiving financial assistance and moving into a new unit.
- Lead-Based Paint Requirements
  - More stringent that habitability requirements.
  - Required for all pre-1978 units when a child under the age of six is or will be living in the unit (includes pregnant women).
- Case file should provide evidence of compliance with these rules; subgrantees can use habitability checklist and lead screening worksheet on HRE.

Areas for Review: Financial Management

- Standards for Financial Management Systems
  - Financial Reporting
  - Accounting Records
  - Internal Controls
  - Written Financial Procedures
  - Tracking of Expenditures by activity
  - Timely submission of invoices
  - All payments must be made to 3rd parties!

Areas for Review: Financial Management

- Adequate Source Documentation
  - Eligibility (proof from case file/HMIS, etc.)
  - Amount (lease, bill, etc.)
  - Recommendation/Approval of Assistance from staff
- Eligible and Allowable Costs
- Salaries/Wages
  - Actual time worked/Not estimated or percentage
- Payments made to 3rd Party

Areas for Review: Financial Management

- Audits
- Procurement
- Equipment
- Volunteer Donated Services

Areas for Review: Data Collection and Reporting

- HMIS or Comparable Database
  - – Comparable database is rare
  - – Must be consistent with HMIS Data Standards
- Confidentiality of Records
- Timely Submission of Data for QPRs and APRs

Areas for Review: Data Collection and Reporting

- Grantees must be familiar with:
  - the HMIS
  - the data quality protocol
  - how end users are trained

Areas for Review: Other Federal Requirements

- Nondiscrimination and Equal Opportunity Requirements
- Code of Conduct
- Fair Housing
- Drug-free Workplace
- Equal Participation of Religious Organizations
- Lobbying and Disclosure Requirements

HELPFUL TIPS AND RESOURCES

Why Things Go Wrong

- Issue: Subgrantee does not understand expectations or Notice requirements
- What to do:
  - Ensure subgrantee has written program policies and procedures in place and is following them
  - Continuously communicate expectations staff to ensure awareness through regular meetings or conference calls
  - Establish clear timelines
  - Emphasize reporting deadlines
  - Conduct frequent targeted reviews

Why Things Go Wrong

- Issue: Subgrantee lacks the capacity or tools to meet requirements
- What to do:
  – Provide on-going technical assistance (request guidance from HUD field office)
  – Identify other subgrantees as a peer support
  – If necessary, identify a new subgrantee to carry out program activities (Notify HUD field office of any program changes needed)

Training

- Targeted or general
- Provide on-going training
  - Make it relevant and useful, identify and address areas of confusion
  - Respond to requests quickly
  - Be accurate: prepare!
  - Be realistic: consider subgrantee limitations

Technical Assistance

- Reacts to a specific area of concern, goal is to solve the problem
- One-on-one targeted training
- Provided by Grantee, HUD staff, or National TA Provider

Take-Aways

- Regularly reference the HRE & FAQs and join the HPRP Listserv (will help to understand the HPRP Notice)
- Documentation is the Key (i.e., written subgrantee agreements, written standard program procedures, determining eligibility, 3rd party payments, etc.)
- Encourage the Subgrantee to establish Quality Assurance Practices to internally review files
- Contact your local HUD field office when needing guidance regarding serious matters

Resources

- Submit program questions and technical assistance requests to the HUD HRE Virtual Help Desk: http://www.hudhre.info/helpdesk/index.cfm?do=viewHelpdesk
- Join the HPRP listserv: http://www.hudhre.info/index.cfm?do=viewJoin
- Review relevant ARRA webpage: http://www.hud.gov/recovery
- Revised CPD Monitoring Handbook on HUDClips: http://www.hud.gov/offices/adm/hudclips/handbooks/cpdh/6509.2/index.cfm

Future Webinars

- Managing and Monitoring HPRP Subgrantees (repeat): May 12th, 11am EST
- Complying with Inspection Requirements: May 20th, 2pm EST
- HPRP and Financial Management: June TBD
- HPRP for HMIS Administrators: June TBD

Save the Date

HUD Conference on Homelessness

September 14-17 - Denver

September 27-30 - Atlanta

Covering topics on:

HPRP HEARTH HMIS

QUESTIONS AND ANSWERS

REMEMBER TO SUBMIT QUESTIONS TO:

www.hudhre.info – Virtual Help Desk