Building the Bridge: HPRP to ESG

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Webinar Format

- Webinar will last approximately 1.5 hours
- Recording will be posted on the HUD’s Homelessness Resource Exchange
- Materials will be posted within one week of today
- Audience members are “muted” due to the high number of participants
- Presenters will announce “next slide” due to time lag during live broadcast of webinar.

Audio Issues During the Webinar

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Submitting Questions

- During the webinar, use the “Questions” function in the “GoToWebinar” toolbar
- After the webinar, submit questions to HUD’s Virtual Help Desk
- Reference this presentation “Building the Bridge: HPRP to ESG” in your question

Objectives of the Webinar

Webinar participants will be able to:
- Prepare for successful implementation of ESG by:
  - Strategically targeting ESG for greatest impact
  - Building on HPRP experience and lessons learned
  - Integrating ESG planning and implementation with mainstream and other homeless programs
  - Understanding key requirements of ESG’s Rapid-Re-Housing (RRH) and Homelessness Prevention (HP) components
- Understand core requirements for ending and closing out HPRP

Outline

- HPRP to ESG: Purpose; Similarities and Differences; Applying Lessons Learned
- HPRP Closeout: Spending 100% of Funds; Other Wrap-Up Issues; Closeout Procedures
- Strategic Use of Funds: Identifying Need and Planning your ESG program
- Implementing Rapid Re-Housing and Homelessness Prevention Programs Under ESG
- Summary
HPRP to ESG:

- Purpose
- Similarities and Differences
- Applying Lessons Learned

**HPRP to ESG**

- **Purpose:**
  - The *Emergency Shelter Grants* program was originally designed for emergency shelter for already-homeless people and limited prevention services
  - The *Homelessness Prevention and Rapid Re-Housing Program (HPRP)* was a one-time program responding to an economic downturn
  - *Emergency Solutions Grants (ESG)* has expanded activities but a sharper focus on rapid re-housing and ending homelessness

**HPRP to ESG**

- **Targeting:**
  - Under the *Emergency Shelter Grants* program, targeting of homelessness prevention was accomplished through the limitations on the uses of funds in the statute
  - With HPRP, targeting was primarily accomplished through local priorities and grantee or subgrantee practices
  - For *Emergency Solutions Grants*:
    - A new definition of “at risk of homelessness” – below 30% AMI
    - New written standards required to codify targeting policies and procedures
    - ESG is aligned with the strategies/goals in *Opening Doors: Federal Strategic Plan*
Challenge with ESG

- Difference in size and scope:
  - HPRP: $1.5 billion ARRA allocation to serve Homeless and At Risk at/below 50% AMI
  - ESG: FY 2012 $286 million to serve Homeless and At Risk of Homelessness below 30% AMI
- More possible activities
- Change in targeting: serving population with greater needs (more RRH)
- Increased case management requirement
- HMIS and documentation/recordkeeping requirements

HPRP to ESG

- Key Similarities:
  - Both focus on immediate housing
  - Many of the same activities allowed
  - Emphasis on data collection and performance – use of HMIS is required
  - Documentation of eligibility is crucial
  - Coordination with CoCs
  - Both are a part of a community’s larger plan for ending homelessness (ConPlan)

HPRP to ESG

- Key Differences:
  - Number of jurisdictions receiving direct awards
  - Eligible activities (including up to 24 months of rental assistance)
  - Eligible program participants & target populations (including reassessment requirements)
  - Increased documentation requirements
  - Documentation of policies and procedures required to be formalized
  - Enhanced coordination and collaboration requirements
Eligibility for Rapid Re-Housing in ESG is Different from HPRP

- Persons defined as Homeless under the following categories are eligible for rapid re-housing assistance:
  - Category 1 – Literally Homeless
  - Category 4 – Fleeing/Attempting to Flee DV (where the individual or family also meets the criteria for Category 1)
- Initial assessment to document eligibility (but does not include income)
- Reassessment at 1 year:
  - Income (30% AMI)
  - Whether they lack sufficient resources and support networks necessary to retain the housing without assistance

Eligibility for Homelessness Prevention in ESG is Different from HPRP

- Persons defined as Homeless under the following categories are eligible for prevention assistance:
  - Category 2 – Imminent Risk of Homeless
  - Category 3 – Homeless Under Other Federal Statutes
  - Category 4 – Fleeing/Attempting to Flee DV
- Persons under Categories 1, 2, and 3 of the At Risk of Homeless Definition
- Initial assessment to document eligibility
  - ALL persons assisted with homelessness prevention funds must also have an income BELOW 30% AMI
- Reassessment required every 3 months

Building on Existing Practices

- Assessment & intake processes
- Targeting and re-housing/stabilizing strategies
  - Experience with identifying those who would be homeless without this assistance
  - Experience with housing locator services, including effective marketing and negotiation with landlords
- Recordkeeping, HMIS/data entry, and monitoring processes
- Experience of service providers
- Relationships with landlords
- New and stronger collaborations across systems
In reviewing the policies and practices for HPRP in your jurisdiction, ask these questions as you plan for ESG:

• What worked?
• What do you keep?
• What could have worked better?
• What do you modify?
• What didn’t work and is no longer meeting the need?

It’s not too late!

Focus transition efforts:
• Invest in Rapid Re-Housing
• Target program efforts carefully
• Focus on results
• Collect quality data in HMIS
• Collaborate with CoCs

See HUD Secretary Donovan’s message to ESG recipients, subrecipients and CoCs on [HUDHRE.info](http://www.youtube.com/embed/xAi5PMiEDsw)
Why invest in Rapid Re-Housing?
- Rapid Re-Housing
  - Transitions people out of homelessness quickly
  - Directly decreases overall number of homeless persons in shelters and on streets
- Homelessness Prevention
  - Difficult to strategically target (many people assisted would not have become homeless)
  - More difficult to measure effect on reducing literal homelessness

Planning for the End of HPRP
- Spending 100% of Funds
- Other Wrap-Up Issues
- Closeout Procedures

100% Expenditure Requirement

HUD expects every grantee to expend **100 percent** of the HPRP grant within 3 years, as required by Congress.
100% Expenditure Requirement

Options for Spending Remaining Funds

- Re-allocate funds to subgrantees still providing HPRP services or assistance
- Re-open the program to serve a limited number of additional participants
- Work with HUD to identify barriers and plans for overcoming them

*Note*: Make sure you commit 100% of funds in IDIS! Even 98.5% committed = tens or hundreds of thousands of dollars left on the table

Requesting TA

Please let your Field Office and HPRP Desk Officer know if you would like Technical Assistance to spend 100% of your grant

TA may be delivered by any combination of:

- HUD Field Office Staff
- HUD Headquarters Staff
- HUD’s Technical Assistance Providers

Jobs Calculation

- Confusion about what “Jobs Created and Retained” means
- Total labor paid (in terms of FTE) by HPRP funds for the quarter reported
  - Reasonable estimates for fee-for-service billing
- Maintain supporting documentation for quarterly calculation
Planning for the End of HPRP

What to do about HPRP participants who are not stable at the end of the grant?

• Develop a schedule/process for notifying potential & current participants, working with service partners, and working with landlords before services and/or rental assistance ends
• Develop a plan for each participant who is not stably housed at the time the program ends
• Consider how you will assess who gets any continued assistance under ESG

Planning for the End of HPRP

You can use ESG to serve people coming out of HPRP, but:

• You need to re-assess eligibility for ESG
• Length of assistance “clock” starts over for program participants who transition from HPRP to ESG
• Housing status from HPRP doesn’t transfer: if participants are in housing, their status would be homelessness prevention assistance
• Re-assessment required every 3 months
• Remember – there is a 100% match required for ESG recipients (can be cash or in-kind)

Planning for the End of HPRP: HMIS

• Exit all HPRP participants upon program completion
• Do not delete them from the system
• Add the date of exit and the destination
• Properly reflect circumstances (e.g., stably or unstably housed)
• If an exited participant will be served under another program (ESG or CoC) they need to be added under that program to be counted properly
Planning for the End of HPRP

What if you are a community that got HPRP but does not get ESG?

• Apply to the State ESG program
• Consider other resources in the community that can be used in a similar way
• Consider using ESG with the following resources, as some communities did with HPRP:
  • HUD-VASH: May use ESG for security deposits and arrears for rent and/or utilities to help rapidly re-house homeless veterans
  • HOME TBRA funding for HPRP-like activities: If a HOME TBRA recipient also meets eligibility requirements for HPRP, ESG funding could provide supportive services

HPRP Grant Closeout Procedures

COMING SOON!

Closeout Overview

• The Closeout Procedures are under review and should be published soon
• A Grant Closeout Tool will be posted on the HUDHRE to assist grantees and Field Offices
• For HUD to close out a grant, the following actions must have occurred:
  ✓ All eligible activities completed and all data entered into HMIS
  ✓ All grant funds expended and used to pay eligible costs
Closeout Overview

- All required reporting completed in FederalReporting.gov (FR.gov) and e-snaps, grant marked as complete in FR.gov
- All funds drawn from IDIS, and all projects/activities marked as complete in IDIS
- All special conditions met
- All monitoring completed and Findings closed
- All audit Findings resolved
- All allowable cost adjustments and repayments made

Criteria for Initiating Closeout

A grant is ready for closeout when:

1. Three years have passed since the date HUD signed the grant agreement; or
2. The grantee has completed its program, which is when:
   a. The grantee and subgrantees have finished providing HPRP-funded eligible activities and all data entry in the Homeless Management Information System (HMIS) is complete;
   b. The grantee has expended 100% of HPRP grant funds; and
   c. The grantee has resolved all monitoring and audit findings.

NOTES:
- The grantee has 90 days after the deadline to draw down funds for eligible expenditures incurred during the grant period and prior to the deadline.
- No costs may be incurred after the 3-year expenditure deadline.
- After the 90-day period, no further funds may be drawn down.
Grant Closeout

After the grant has been closed out, the grantee must continue to comply with:

• The further repayment obligations under 24 CFR 85.51 and 85.52;
• The audit requirements under 24 CFR 85.26;
• The equipment requirements under 24 CFR 85.32; and
• The record retention and access requirements under 24 CFR 85.42.

Recapture and Adjustments

• HUD will recapture all HPRP funds not expended for eligible activities by the 3-year deadline.
• HUD will review the grantee’s final reports and make cost/cash adjustments upward or downward, if necessary, and the remaining grant balance will be returned to the U.S. Treasury.

HPRP Reporting Requirements

• Grantees must submit all required final reports no later than 90 days after the 3-year expenditure deadline or 60 days after the end of the federal Fiscal Year (November 30, 2012), as applicable.
• FR.gov and Q13 reports due no later than October 10, 2012.
• The Year 3 APR will be due by the earlier of:
  o 90 days after the 3-year expenditure deadline or date of termination (as applicable); OR
  o 60 days after the end of the federal Fiscal Year (November 30, 2012).
• HPRP grantees are not required to submit the Federal Financial Report (SF-425) required by 24CFR 85.41. For HPRP, IDIS fulfills this requirement.
HPRP Year 3 APR

Announcement!

- HPRP Year 3 APR is now open in e-snaps!!!
- Due by November 30, 2012 OR within 90 days of grant end (starting now), whichever is sooner
- Almost all grantees have to do a Year 3 APR, because HUD needs complete data for all grants.
- Send questions to the Virtual Help Desk at www.hudhre.info.

Strategic Use of Funds: Identifying Need and Planning Your ESG Program

Identifying Resources to Meet Needs

- What resources exist in the community (including HPRP)?
- Where are the gaps now?
- Where could gaps exist after HPRP funding ends?
- How will you use ESG to fill gaps?
- What services will you prioritize for your community?
Evaluating Need

- Did your analysis and your substantial amendment/Action Plan clearly identify:
  - Who needs RRH assistance?
  - Who needs HP assistance?
  - What kind of assistance do they need?
    - Financial? Intensity? Duration?
    - Relocation and Stabilization Services? Intensity? Duration?
  - What is impact of closing out HPRP in community? How does that affect need?

Evaluating Available Funds

- Did your analysis and substantial amendment/Action Plan identify other funding options?
- Did you assess whether/how funds can be combined?
- Does your list of other funding options include:
  - TANF Block Grants
  - Federal HOME grants
  - Philanthropic organizations
  - SHP, S+C
  - Churches & other community-based organizations
  - Section 8
  - New CoC programs

Evaluating Performance Standards

- Did you consult with CoC to establish performance standards and a process for evaluating program effectiveness?
- Did you review HMIS data to identify trends associated with successful outcomes?
- Do the performance standards:
  - Create measures to evaluate each service provider’s effectiveness?
  - Complement/contribute to the CoC program performance measures?
- Did you establish mechanisms to re-evaluate these standards over time?
Implementing Rapid Re-Housing and Homelessness Prevention Programs Under ESG

Partners/Subrecipients

- Select partnerships with experienced RRH/HP providers
  - Which did a good job under HPRP
  - With the experience you want to build on (for example, existing landlord relationships)
- Be clear about your expectations
- Monitor and follow up on concerns as re-evaluation
- Select subrecipients prior to obligation deadlines

**NOTE:** Only a PHA that is a unit of general purpose local government may receive ESG funds. A PHA is not an eligible subrecipient. **HUD cannot waive this.**

KEY REQUIREMENTS YOU NEED TO KNOW TO IMPLEMENT ESG!!!

- Required under ESG:
  - a housing stability plan
  - monthly meetings with the case manager
  - referrals to mainstream and other resources

- **NOTE:** Service providers who also receive VAWA and/or FVPSA funds cannot require victims of domestic violence to participate in services as a condition of continued participation in the ESG program
KEY REQUIREMENTS YOU NEED TO KNOW TO IMPLEMENT ESG!!!

- On-going rental assistance: up to 24 months

- Rental arrears:
  - One-time payment, up to 6 months

- Just as with HPRP’s “cost type rule”:
  ESG financial assistance cannot be provided to a program participant receiving the same type of assistance for the same period of time from another public program

KEY REQUIREMENTS YOU NEED TO KNOW TO IMPLEMENT ESG!!!

- A legally binding, written lease between tenant and landlord is required to receive ongoing rental assistance

- A rental assistance agreement between recipient/subrecipient and landlord for back rent

- ESG requires housing units to meet BOTH Rent Reasonableness standards and criteria established under HUD’s published FMRs
  Remember: FMR ≠ Rent Reasonableness

KEY REQUIREMENTS YOU NEED TO KNOW TO IMPLEMENT ESG!!!

- Lead-Based Paint standards apply
  - Visual assessments are required for ALL units receiving financial assistance if constructed before 1978, and child under 6 or pregnant woman will live there
  - If remediation is needed, follow 24 CFR part 576.403

- Habitability Standards apply
  - Under HPRP, applicable only to participants receiving financial assistance and moving into new units.
  - Under ESG, applicable to all financial assistance, including assistance that is limited to rental arrears in current housing unit
You should now be able to:
- Prepare for successful implementation of ESG by:
  - Strategically targeting ESG for greatest impact
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  - Understanding key requirements of ESG’s Rapid-Re-Housing (RRH) and Homelessness Prevention (HP) components
- Understand core requirements for ending and closing out HPRP
- Please complete the on-line survey to rate how well this webinar met its objectives