

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



Nuts & Bolts of HPRP



2009 REGIONAL HPRP TRAINING

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

Purpose

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- Provide grantees and subgrantees with details about:
 - Program Development
 - Program Participant Eligibility Requirements
 - Eligible Activities
 - Grantee Responsibilities

Program Development

Program Development: Community Vision

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- How do we allocate funding in our community?
- How do grantees and subgrantees consider who should receive HPRP assistance?
- How can grantees use funds most effectively and efficiently to serve as many households as possible?

Program Development: Needs, Resources, and Gaps

- Consider need in the community
 - Coordination with CoC
 - Citizen participation
 - Impact of economic crisis
- Identify gaps & all resources to fill the gaps
 - Consider mainstream resources, including ARRA programs
 - HPRP is one of many resources to serve people
- HPRP budget and allocation to program activities should reflect need and gaps

Program Development: Assistance Types

- Homelessness Prevention
 - Prevent individuals and families at risk of homelessness from becoming homeless
- Rapid Re-housing
 - Assist persons experiencing homelessness to be quickly re-housed and stabilized

Program Development: Service Area

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- Grantees may spend funds outside the jurisdiction to address regional need
 - Program participant may rent in another jurisdiction
 - Subgrantee can serve multiple jurisdictions
 - Can be within or outside of grantee's borders (e.g. Urban County serves people in Metropolitan City)
 - States can subgrant to all cities and counties

Program Development: Things to Consider

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- Need for hiring and staffing (jobs creation/retention)
- Service delivery
 - Centralized intake (211 or center)
 - "No wrong door" approach
 - Web-based housing locator, if linked to HMIS
- Outreach
 - To potential participants and landlords

Program Development: Things to Consider

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- Grantees determine subsidy levels, other eligibility requirements (e.g. more stringent)
- Grantees determine responsibility for inspections
- Subgrantee agreements should be specific

Community Perspectives: HPRP Development in Indiana

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Community Perspectives: State of Indiana

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- Program Design
 - Single point of entry into each CoC
 - Common assessment tool
 - Case management training
 - Services to link households to other stimulus programs and mainstream services

Community Perspectives: State of Indiana

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- Two primary goals of all services:
 - Housing Stability
 - Economic Self-Sufficiency
- IHCD and Continuum of Care will structure a network of mainstream services to link HPRP program participants to long-term community supports
- Full presentation at: www.in.gov/ihcda/3120/htm

Program Development: Subgranting

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- Selection of subgrantees:
 - Grantees may develop their own allocation process
 - Should be a fair and reasonable process
- Subgranting to another local jurisdiction is permissible (not a joint application)
- Grantee maintains responsibility for oversight

Program Development: Subgranting

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- Subgranting to Public Housing Agencies
 - Not eligible, unless the grantee requests and receives a waiver
 - Allowable without waiver, if, by state statute, PHAs have been designated as agencies of units of general local government (city or county)
 - Written request to CPD Director

Allocation Strategies

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- Formula
- Competition
- Hybrid approach
 - Combines a formula with a modified competition
 - Michigan, Arizona, and Wisconsin state grantees use hybrid allocation processes for ESG and current prevention programs

Allocation Strategies (cont'd)

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- For ESG, Michigan uses formula and CoC network to coordinate resources and decisions at local level
- In Arizona Prevention program, each County receives flat amount, plus additional funds based on population or rural status
- For ESG, Wisconsin formula uses housing data, population data, and unemployment data to allocate to counties. Then, competitive process within counties.

Participant Eligibility

Eligible Participants

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“Would this individual or family be homeless ***but for*** this assistance?”

- Intent is to assist households who are at the greatest risk 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

Eligible Participants

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- Program participants must be homeless or about to become homeless AND:
 - Initial consultation to determine appropriate assistance
 - Income of 50% or less Area Median Income (AMI): see www.huduser.org/DATASETS/il.html
 - No other housing options
 - No financial resources or support networks to obtain or remain in housing

Eligible Participants

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- For Rapid Re-housing, program participants must be homeless (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

Local Targeting

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- Identify local target population
- Prevention “Risk Factors” could include:
 - Eviction within 2 weeks
 - Discharge from institution within 2 weeks
 - Residency in condemned housing
 - Sudden loss of income or increase in utility costs
 - Mental health and substance abuse issues
 - Physical disabilities and chronic health issues
 - Extremely low income (\leq 30% AMI)

Eligibility vs. Targeting

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- Participant eligibility is:
 - Whether participants meet HUD’s minimum requirements
- Targeting is:
 - How the local grantee wants to use HPRP funds for people who are eligible
 - What additional requirements will you impose?
 - How much to spend on prevention and how much for rapid re-housing?

Initial Client Assessment

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- Verify and document each client's eligibility for the program (homeless or at-risk)
- Evaluating appropriateness of HPRP for household
 - Persons without barriers are not appropriate for HPRP
 - Persons with many barriers need more than what HPRP can offer
 - Consider household's economic circumstances

Income Determination

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- HPRP requires that all program participants be at or below 50% Area Median Income
- Use the guidance available for the Housing Choice Voucher program (formerly Section 8) for HPRP
- It is prospective
- Assets only counted for determining AMI eligibility, not for determining tenant rent

Ongoing Eligibility Assessment

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- Evaluate and document eligibility for financial assistance at least every 3 months
 - Eligibility criteria
 - Appropriateness
- Evaluate the continuation of services

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

Eligible Activities

Eligible Activity Categories

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- Financial Assistance
- Housing Relocation and Stabilization Services
- Data Collection and Evaluation
- Administrative costs

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Eligible Activities: Rental and Utility Assistance

- Total period of assistance cannot exceed 18 months for rental assistance and 18 months for utilities
- Arrears (up to 6 months) but counts toward 18-month service period
- Rental assistance must comply with HUD's "rent reasonableness" standard:
www.hud.gov/offices/cpd/affordablehousing/library/forms/rentreasonablechecklist.doc

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Eligible Activities: Other Financial Assistance

- Security Deposits
- Utility Deposits
- Moving costs
- Storage (up to 3 months)
- Hotel/motel vouchers (up to 30 days)
- Staff costs to issue financial assistance should be included
- Cost of inspections for habitability standards

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INELIGIBLE Activities: Financial Assistance

- Duplicating payments
 - using HPRP funds and another source for exact same cost type for same time period
- Mortgage assistance/costs
- Operations costs for housing programs
- Assistance longer than 18 months
- Direct payments to program participants
- Payment of credit arrears (credit cards, loans, etc.)

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Eligible Activities: Housing Relocation & Stabilization Services

- Services to assist homeless persons that need temporary assistance to obtain housing
- Services to assist persons at risk of homelessness to maintain housing
- Eligible services:
 - Case management; outreach and engagement; housing search and placement; legal services; credit repair

INELIGIBLE Activities: Housing Relocation & Stabilization Services

- Non-housing services, such as:
 - Child care
 - Employment training
 - Education (i.e. books, fees, tuition, etc.)
 - Transportation (i.e. gas, bus tokens, cabs, etc.)
 - Food, household items, clothing
 - Furniture and appliances
- Discharge planning at institutions

Transitional Housing Policy

- Not eligible:
 - Providing HPRP assistance to help someone move into a TH program
 - Providing assistance while someone is living in a TH program
- Eligible:
 - Providing assistance to someone timing out of a TH program who is going to be homeless

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Eligible Activities: Data Collection and Evaluation

- Reasonable costs for collecting and reporting data through HMIS
- Software and hardware costs
- Connectivity costs
- HMIS training (users and system admin.)
- Data warehousing/aggregation from multiple CoCs with different HMIS software solutions implemented
- Participation fees for providers using the HMIS

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INELIGIBLE Activities: Data Collection and Evaluation

- Planning or developing new HMIS
- Implementing a comparable database when CoC has an HMIS
- Contracting for program evaluation

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Eligible Activities: Administrative Costs

- Cannot exceed 5% of grant total
- Eligible costs:
 - Pre-award administrative costs
 - Accounting for the use of grant funds
 - Preparing reports for submission to HUD
 - Obtaining program audits
 - Grantee or subgrantee staff salaries associated with eligible administrative costs
 - HPRP training for staff

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INELIGIBLE Activities: Administrative Costs

- Staff costs for issuing financial assistance or providing services
- General training (e.g. for a case manager to gain credentials)

Grantee Responsibilities

Substantial Amendment

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- Grantees that have not submitted their Substantial Amendment must request a waiver
- Obtain DUNS number and complete/renew CCR registration: www.dnb.com
- HUD will notify grantees within 45 days of receipt of application
- HUD will sign/execute grant agreement; grantee must sign and return agreement within 15 days

Grantee Responsibilities: Leveraging Other Resources

- Grantees are strongly encouraged to maximize all Recovery Act resources
- Recovery Act funding for serving homeless and at-risk persons also provided to other federal agencies (e.g. Education, HHS, Labor, Homeland Security, etc.)
- Chart of Recovery Act resources and opportunities for collaboration posted on HPRP page at www.hudhre.info

Grantee Responsibilities: Other Federal Requirements

- Habitability Standards
- Lead-Based Paint Requirements
- Conflicts of Interest
- Nondiscrimination and Equal Opportunity Requirements
- Fair Housing and Civil Rights laws
- Environmental Requirements do not apply

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Grantee Responsibilities: Other Federal Requirements

- Uniform Administrative Requirements
- Equal Participation of Religious Organizations
- Lobbying and Disclosure Requirements
- Drug Free Workplace Requirements
- Procurement of Recovered Materials

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Habitability Standards Requirements

- The standards are listed in the Notice – different from Housing Quality Standards (HQS)
- Inspection required any time a participant moves into housing with HPRP
- Inspections are not required where clients are staying in their housing
- Must be re-inspected at least annually

Lead-Based Paint Requirements

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- Rental assistance and security deposits for families with a child under the age of six in pre-1978 housing triggers the Lead-Based Paint Requirements
 - Initial “Visual Assessment” required upon occupancy, and periodic inspections, and anytime occupancy changes
 - See regulations for exceptions
- 24 CFR Part 35 Subparts A, B, M and R

Financial Requirements

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- HUD will establish grantee's line of credit and grantee draws funds through IDIS
- Grantees must draw down funds from IDIS at least quarterly
- Reimbursement is the preferred method of payment
- All expenditures must be incurred within 3 years, but there will be a close-out period

Other Requirements

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- HPRP funds must be issued to a third party (e.g., landlord or utility company), NOT directly to program participants
- An assisted property may not be owned by the grantee, subgrantee or the parent, subsidiary or affiliated organization of the subgrantee,
 - HUD may waive for good cause
- Grantees who use funds for ineligible activities must reimburse HUD

Pre-Award Costs

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- Eligible pre-award costs – administrative costs only
- Include costs directly related to preparing Substantial Amendment:
 - Staff costs or hiring a consultant to prepare the Substantial Amendment
 - Costs related to public comment process
- Attending HUD-sponsored HPRP meetings and trainings
- Publication of Notice through grant execution

Monitoring Requirements

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- HUD will monitor grants on-site and remotely
- Grantees must monitor subgrantees for compliance
 - HUD will provide tools for grantees and subgrantees to assess compliance

Reporting

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- All Recovery Act programs have stringent and transparent accountability reporting
- Federal departments must post reports on recovery.gov

Report Type	Reporting Period
Initial Quarterly Performance Report Due 10/10/09	Date of Grant Agreement execution through 9/30/09
Quarterly Performance Reports Due 10 days after end of each quarter	October 1 to December 31 January 1 to March 31 April 1 to June 30 July 1 to September 30
Annual Performance Report Due 60 days after end of Federal fiscal year	October 1 to September 30

Changes to the HPRP Notice

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- HUD will review all substantial amendments within 45 days of receipt
- Grantees may request waivers of HPRP Notice requirements, must establish good cause
- Limit of 18 months per program participant to receive Housing Relocation and Stabilization Services
- Establishes 90-day grant closeout period
- Pre-award costs may be incurred through date of grant agreement (no change in eligible pre-award costs)
- DC is a Metropolitan City under HPRP

Resources

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- HPRP page on HUD HRE: www.hudhre.info
 - Virtual Help Desk
 - Q&A document and searchable FAQ database
 - Community documents
 - Resource library
 - Some materials already developed
 - Additional materials being developed
 - Coming Soon: request TA on-line!
- HUD webcast archive: www.hud.gov