



# American Recovery and Reinvestment Act of 2009

## Homelessness Prevention and Rapid Re-housing Program

Office of Special Needs Assistance Programs  
Office of Community Planning & Development  
**U.S. Department of Housing and Urban Development**



# Welcome and Introductions

2

## Presenters:

- Mark Johnston, Deputy Assistant Secretary for Special Needs
- Ann Oliva, Director, Office of Special Needs Assistance Programs (SNAPS)
- Susan Ziff, SNAPS Specialist
- Nakia McMorris, SNAPS Specialist

# Agenda

3

1. HPRP Overview:
  - a. Legislation and Implementation
  - b. Funding Allocations and Eligible Grantees
  - c. Key Expenditure Dates and Reallocation
  - d. Program Intent
2. Eligible and Prohibited Activities
3. Eligible Participants and Targeting

# Agenda (cont.)

4

4. Substantial Amendment Requirements and Post-Award Activities
5. Grantee Responsibilities
6. HMIS and Performance Reporting Requirements
7. Technical Assistance and Resources
8. Review of FAQs

# Legislation and Implementation

5

- The American Recovery & Reinvestment Act of 2009
  - Provided \$1.492 billion for grants
  - Established formula, eligible activities, and expenditure and reporting requirements
- HPRP Notice, published March 19, 2009
  - Renamed Homelessness Prevention and Rapid Re-Housing Program (HPRP)
  - Established requirements, applicable regulations

# Program Intent

6

- Focus of HPRP is housing stabilization
- Provides temporary financial assistance and/or services to help persons gain housing stability
- Intent is to serve persons who:
  - Are homeless or would be homeless but for this assistance
  - Can remain stably housed after this temporary assistance ends

# HPRP is NOT....

7

- A mortgage assistance program
- Intended to serve persons who need long-term and/or intensive supports
- ESG Program
  - Different eligibility requirements
  - Different eligible activities
- Rapid Re-housing (RRH) Demonstration
  - Different requirements and activities

# Key Differences between HPRP & RRH Demonstration

8

Item	RRH Demo	HPRP
Eligibility	Families with children	Individuals or Families (with or without children)
Rental Assistance Period	3-6 months OR 12-15 months	Any # of mos. up to 18 mos.
Centralized Intake Process	Required	Recommended

# Funding Allocations

9

- Funding allocations based on 2009 ESG formula
  - \$500,000 grant minimum set by HUD Secretary
  - 540 grantees
- Eligible grantees are States, metropolitan cities, urban counties, and territories
- All eligible grantees are listed online at: [www.hud.gov/recovery/homelesspreventrecov.xls](http://www.hud.gov/recovery/homelesspreventrecov.xls)

# Eligible Grantees: States & Commonwealth of Puerto Rico

- State grantees must:
  - Award funds to local units of government (including those receiving direct HPRP allocations) and/or private non-profit organizations
  - Share a reasonable amount of administrative funds with subgrantees
- State grantees may not subgrant to state agencies

# Eligible Grantees: Metro Cities, Urban Counties & Territories

- Metropolitan cities, urban counties, and U.S. territories must:
  - Share a reasonable amount of administrative funds with subgrantees
- Metropolitan cities, urban counties, and U.S. territories may:
  - Carry out eligible activities themselves
  - Subgrant to private non-profit organizations
  - Subgrant to another local government (new for HPRP)

# Key Expenditure Dates

12

- 60% of allocation must be spent within 2 years of grant execution
- 100% of allocation must be spent within 3 years of grant execution
- Clock begins when HUD signs the Grant Agreement

# Reallocation

13

HUD will reallocate funds when:

1. Grantees request less than allocated amount or refuse allocation
2. Grantees do not expend 60% of funds within 2 years of grant execution
  - Funds will be reallocated by a process to be specified later

# Eligible Activity Categories

14

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

# Eligible Activities: Rental and Utility Assistance

15

- Short term (up to 3 months)
- Medium term (4 –18 months)
- Total period of assistance cannot exceed 18 months for rental assistance and 18 months for utility assistance
- Arrears (up to 6 months) but counts toward 18 month service period
- Rental assistance must comply with HUD's "rent reasonableness" standard

# 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

# INELIGIBLE Activities: Financial Assistance

17

- 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.)

# Eligible Activities: Housing Relocation & Stabilization Services

18

- 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

19

- 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

# 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

# INELIGIBLE Activities: Data Collection and Evaluation

21

- Planning or developing alternative data system to HMIS EXCEPT when no HMIS in CoC and/or CoC does not exist
- Replacing local or state funding EXCEPT when state/local funding is no longer available
- Contracting for program evaluation

# Eligible Activities: Administrative Costs

- Cannot exceed 5% of grant total
- Eligible 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
  - Training for staff that is directly related to learning about HPRP
  - Pre-award administrative costs

# INELIGIBLE Activities: Administrative Costs

23

- Staff costs for issuing financial assistance or providing services
- General training (i.e. for a case manager to gain credentials)
- Training or technical assistance from someone other than HUD-approved national TA provider

# Other Requirements

24

- 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
- Grantees who use funds for ineligible activities must reimburse HUD

# Eligible Participants

25

- 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](http://www.huduser.org/DATASETS/il.html)
  - No other housing options
  - No financial resources or support networks to obtain or remain in housing

# Targeting

26

- HPRP provides flexibility to grantees to meet the needs in their communities
- Grantees determine type of subsidy (declining, shallow, etc.) and may set more stringent requirements
- How do grantees determine who should receive HPRP assistance? How can grantees use funds most efficiently to serve as many as possible?

# Targeting

27

- 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

# Targeting

28

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

- Many are recently affected by economic crisis
- Others have been “precariously housed” and/or homeless for longer

# Targeting for Homelessness Prevention

29

“Risk Factors” for grantees to consider:

- 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)
- Significant medical debt

# Targeting for Rapid Re-housing

30

- Individuals and families are homeless if:
  - 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

# Quiz: Are they eligible for HPRP Assistance?

31

1. A chronically homeless person with SMI who needs a security deposit and moving costs to move into a CoC-funded PSH program
2. A family that is doubled-up, about to be evicted, and will have to go to a homeless shelter
3. A homeowner who is losing their housing and does not have resources to find another place to live

# Quiz: Answers

32

- All of the above are eligible, BUT:
  1. Grantees must consider the appropriateness of HPRP assistance – someone with more significant barriers to housing may be better served with another program
  2. Persons who are doubled-up are eligible, but only if they would become homeless without the assistance
  3. Homeowners are eligible to receive limited assistance, but only if they would be homeless without it

# Substantial Amendment Requirements

33

- Substantial Amendment to the Consolidated Plan 2008 Annual Action Plan includes:
  - Substantial Amendment Form (HUD-40119)
  - SF-424
    - Use the SF-424 at:  
<http://www.hud.gov/offices/adm/hudclips/forms/files/sf424.doc>
    - Required Certifications
- Download at [www.hud.gov/recovery](http://www.hud.gov/recovery) or [www.hudhre.info](http://www.hudhre.info)

# Substantial Amendment Requirements (cont.)

34

- Obtain DUNS number and complete/renew CCR registration (see 73 FR 23483, April 30, 2008 or [www.dnb.com](http://www.dnb.com))

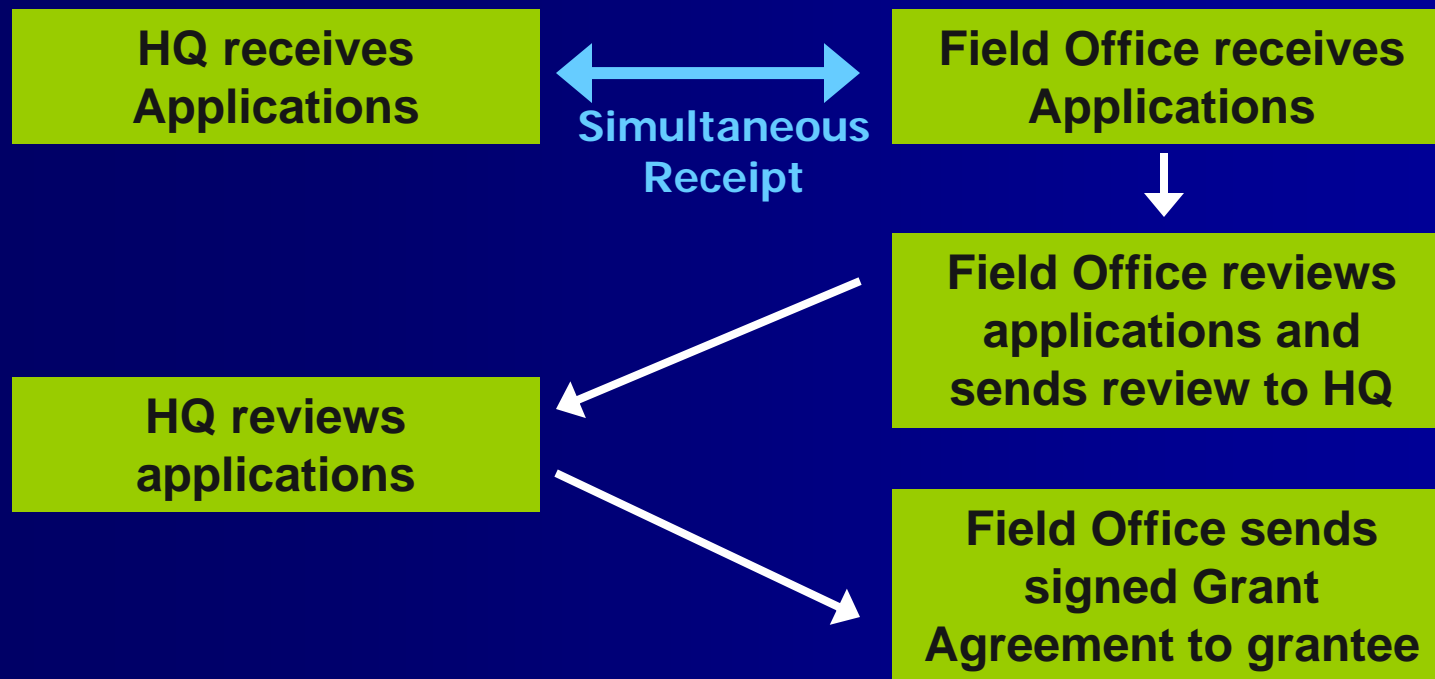
# Substantial Amendment Form Components

35

1. Grantee contact information
2. Citizen participation plan and public comment
3. Grantee's plan for distribution, administration & oversight of funds
4. Grantee's plan for collaboration with CoC(s) and local organizations receiving Recovery Act funds
5. Estimated budget for HPRP funds
6. Signature of the official authorized to sign the substantial amendment

# Substantial Amendment: Submission, Review & Approval

- Original to local field office, postmarked by 5/18/09
- Copy to HUD HQ, postmarked by 5/18/09



# Substantial Amendment: Initial Grant Execution

37

- HUD will review and notify grantees within 45 days of receipt of application
- HUD will sign/execute grant agreement; grantee must sign and return agreement within 15 days

# Post-Award Activities

38

- HUD will establish grantee's line of credit and grantee draws funds through IDIS
- Grantees and subgrantees may be paid in advance (and reimbursed for eligible pre-award costs)
- Grantees must draw down funds from IDIS at least quarterly
- HUD will monitor grants on- and off-site

# Grantee Responsibilities: General

39

- All grantees and subgrantees are subject to requirements of Notice
- Grantees are responsible for:
  - Ensuring appropriate use of the funds and accurate and timely reporting and funding draws
  - Monitoring subgrantees
  - Coordinating with Continuums of Care
- Grantees and subgrantees are responsible for coordinating with local organizations funded by Recovery Act

# Grantee Responsibilities: Local Coordination

40

- HPRP must be administered in coordination with existing CoC and other local homeless planning efforts to:
  - Identify local level gaps and needs for HPRP services
  - Promote collaborative use of Recovery Act funds
  - Align HPRP activities with CoC strategies for preventing and ending homelessness

# Grantee Responsibilities: Leveraging Other Resources

41

- 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 (i.e. Education, HHS, Labor, etc.)
- Chart of Recovery Act resources and opportunities for collaboration posted at [www.hudhre.info](http://www.hudhre.info)

# Grantee Responsibilities: Participant Eligibility

42

- Grantees or subgrantees must:
  - Verify and document each client's eligibility for the program (homeless or at-risk)
  - Assess each household's need and appropriateness for HPRP assistance
  - Evaluate eligibility for financial assistance at least every 3 months

# Grantee Responsibilities: Other Federal Requirements

43

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

# Grantee Responsibilities: Other Federal Requirements

44

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

# HMIS Requirements

45

- Recovery Act requires use of HMIS or comparable database for data collection
- State grantees that administer statewide or balance of state HMIS:
  - May use administrative funds for HMIS data analysis and reporting activities
  - May charge participation fees to subgrantees
    - Subgrantees may use Data Collection and Evaluation activity to pay for participation fees
- State grantees do not provide direct client services; not required to implement HMIS

# HMIS Requirements

46

- Grantees and subgrantees providing HPRP assistance/services must report client-level data into CoC's HMIS or comparable database (unless prohibited by local, state, federal law)
- Comparable database must be consistent with HMIS Data and Technical Standards and meet HPRP reporting requirements

# HMIS Requirements

47

- Domestic violence providers must collect client-level data in a comparable database and report aggregate data to the grantee
  - Organizations with primary mission to serve victims of domestic violence, dating violence, sexual assault or stalking
- Comparable database allowed when:
  - Grantee or subgrantee not located in a CoC
  - CoC has not implemented HMIS
  - Legacy data collection system exists; subgrantee will periodically integrate data with HMIS data

# HMIS Requirements

48

- CoCs without HMIS implemented are encouraged to partner with other CoC for regional HMIS
- Client-level data unduplicated at subgrantee level for quarterly and annual reporting
- Unduplicated client-level data across each CoC to be included in AHAR table shells
- Revised HMIS Data and Technical Standards will be published in April/May

# Reporting

49

- All Recovery Act programs have stringent and transparent accountability reporting; federal departments must post reports on [recovery.gov](http://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

# Timeline

50

- Notice Published.....3/19/09
- Substantial Amendments Postmarked.....5/18/09
- HUD Reviews Completed by.....7/02/09
- Resubmissions Due.....15 days after notification  
(if needed)
- Grant Agreements Executed.....by 9/01/09
- Subgrantee Agreements signed.....by 9/30/09

# Corrections

51

- The Notice states that pre-award costs may be incurred until the grantee submits the substantial amendment to HUD. Change: grantees may incur pre-award costs until the grant agreement is executed.
- The Notice states that all grant funds must be drawn down from IDIS before the expenditure deadline. Change: All expenditures must be incurred within 3 years but HUD will provide close-out period.

# Technical Assistance and Resources

52

- Posted at [www.HUDHRE.info](http://www.HUDHRE.info)
  - Notice and programmatic requirements
  - Virtual help desk and Q & A document and database
  - Sample community documents
  - Development of program guidance documents, tools, and templates
  - Technical Assistance and Training
  - Regional Training Meetings

# Review of FAQs

53

