

NC HPRP FAQs

(as of 8/4/09)

Organizing the Project Team

? How do we organize ourselves? Who should be the lead agency? Should we link with other communities to access this money?

How a community organizes itself is largely up to the community. An application could cover just one county or several counties. The lead agency should be an agency that has the capacity to handle fiscal administration and coordination of all of the intensive reporting requirements. The lead agency may or may not be providing any direct HPRP services – it may act solely as a pass through agency that coordinates invoicing and reporting.

? Can an LME count as a local government entity to be a lead agency?

Yes.

? If a DSS is the lead agency, can they serve people with HPRP funds that they don't usually serve, such as single men?

Yes. The application includes a question about how programs will guarantee that all eligible populations are served, especially if an eligible population is not part of the applying agency's traditional target population.

? We are thinking about a statewide project. Does that make sense?

No, you should partner locally. If you are a statewide organization you are encouraged to have your local representative(s) partner with local application(s) to ensure that your target population is served by the local project(s).

? What if the state gets more than one application covering the same county?

The State will give significant consideration to the Continuum of Care (CoC) or 10-Year Plan's letter of support. The CoC or 10-Year Plan should submit only one support letter per county. (In Guilford County, one letter can be submitted for Greensboro and a separate letter for High Point.)

? Do all partner agencies have to be funded? What if a big part of our project is being done by a non-funded agency?

You should put their name into the relevant charts, followed by "(non-funded agency)."

? Is it ok for the city to apply for funding and have the county also apply?

No, the city and county should work together. There are too many agencies that serve people who live in the city or the county. It is ok for the city to subcontract with the county, or vice-versa.

? On the authorizing letter from jurisdiction – Does it need to prove my agency is a nonprofit eligible for business, or does it need to prove that my agency is the preferred applicant representing the community?

The preferred applicant representing the community.

Transitional Housing

? Can HPRP funds be used to fund rent at a transitional house?

No, HPRP can only be used to fund rent in permanent housing with a lease in place.

? Can HPRP funds be used to assist people graduating from transitional housing?

Yes, it can assist them with permanent housing if they have a lease in place.

? Can we use transitional housing instead of hotel/motel vouchers? It would be cheaper.

No, that is not an eligible expense.

Eligible Activities

? Can you use funds to hire staff?

Yes, you can hire staff to carry out HPRP activities.

? If you have a person who has been in the program for 6 months, and they are discharged at the end of 6 months, but 2 months later they need to come back for additional assistance, are they allowed to do that?

Yes. Households are eligible for up to 18 months of assistance, and those months do not need to be consecutive.

? Can we put more stringent requirements on participants, such as residency requirements?

Technically you can, but you are encouraged to only put into practice rules that facilitate the spirit and intent of the program. For example, if a household has natural and financial supports in another community, it may make sense to encourage them to return to that community regardless of how long they've lived in your community. Similarly, a household that has no support in another town should be assisted in your community regardless of how long they've lived in your town when they present as being eligible for the program.

? My nonprofit serves several counties. We are partnering with a local government in one of those counties. If we have eligible program participants in some of the other counties we serve, can we let all of them participate in the HPRP program for that one county?

No, you would want to explore being an HPRP partner with programs in other counties within your nonprofit's geographic region as well.

? The application talks about 30% of AMI and 50% of AMI. If someone has lost their job, don't we want to serve them even if their income had been at 50% of AMI?

When determining income, you are only looking at income moving forward, not back. So if they lost a job and have no current source of income, they will be well below 30% of AMI.

? Can public housing authorities change their eligibility criteria to make it easier to serve some of the HPRP target population?

There are some housing authority eligibility criteria that are set at the federal level, and those cannot be changed without a federal waiver. Any rules established at the local level could be changed by the housing authority board of directors.

? What if we're working with someone coming out of a mental health hospital? I'm worried about their housing stability.

You do want to have the LME as part of your project team and you want to have a solid referral process to ensure that persons in need of mental health services are linked to appropriate enhanced service providers. The HPRP case manager should not be providing these enhanced mental health services.

? How extensive does case management need to be?

It depends on the needs of the household. At a minimum, participants must meet with the case manager at the beginning of enrollment in the program. If the household receives more than 3 months of assistance they will need a 3 month recertification. If the only reason a household became homeless is because of loss of a job, that should tell the case manager that extensive additional services aren't needed. You may want to provide case management for longer than a household receives rental assistance, just to check up on the household and make sure they are still stable. At a maximum, you can only provide 18 months of case management, but those months don't need to be consecutive.

? Can you apply for case managers to be a part of the prevention work, or only rapid re-housing?

Case managers are a critical part of prevention services as well as rapid re-housing services. The extent of case management services needed by prevention program participants would be determined on a case by case basis.

? Can housing locator, outreach position and case manager be combined into one job?
Yes, if the staff person has all of those skills.

? Is working with people who are in the focus population a requirement?

No, not a requirement, but a strong preference.

Rent Assistance

? Our community has a lot of informal renters who don't really have leases. Are formal leases required for rent assistance?

Yes, renters must have formal leases. You must have a copy of the lease in the client folder.

? Are required inspections considered part of rent assistance?

Yes, in your budget you can pay for inspections as part of your rent assistance line item. You are encouraged to conduct an inspection that is stringent enough to ensure that the unit will meet qualifications for other permanent rent assistance that the household might receive when transferring off of the HPRP assistance.

? Can Section 8 tenants receive rent assistance?

No, you cannot pay rent assistance, including the tenant's portion of the rent, for any month that the tenant is also receiving Section 8 assistance (or Shelter Plus Care or HOME rent assistance).

? Can a Section 8 tenant receive deposit assistance from HPRP?

Yes, as long as deposit assistance wasn't already included in their Section 8 agreement.

? Do rents paid have to be at or less than fair market rates?

No, but you have to conduct rent reasonableness standards for each unit. Rent reasonableness is based on a much smaller geographic region than fair market rent.

? Can we rent a block of apartments or rooms?

You cannot use HPRP funds to pre-lease apartments. You cannot pay a landlord to have apartments available in anticipation that you are likely to have households that can use those units. HPRP rental funds can only be paid for permanent housing that is directly tied to a household, and that household must have a lease with the landlord. In addition, the HPRP program will have a Housing Assistance Contract that lays out the terms of the HPRP payment to the landlord on behalf of the tenant(s).

Hotel rooms can only be used for up to 1 month, and only if there is a known permanent housing unit that the program participant will be moving into within a month (for example, if the landlord has a unit that will be opening up when another tenant moves out in 2 weeks, or if the landlord is spending a week repairing a unit for tenancy). In both of those cases, the tenant is known and the permanent housing unit the tenant will be moving into is known. Therefore, a hotel can be covered, for up to 30 days, while the unit is being prepared for the tenant.

? What kind of arrangements can be made with landlords? Can we make arrangements with landlords to set aside permanent housing units?

You cannot pay for units unless the tenant is living in the unit. You cannot pay to "reserve" units. You are encouraged to ask landlords to work with your tenants, and to lower rents to accommodate your program participants.

? Can we pay 3 months of rent assistance for someone coming out of a jail or hospital? If so, do we have to inspect the unit before they move in?

Yes, and yes.

? What about lead paint inspections?

You must do a visual inspection for any unit built before 1978 that has a child under the age of 6 living in it. The HUD website has a link to a 30 minute training on how to conduct the visual inspections. If the visual inspection identifies potential issues, a more intensive inspection by a certified lead-based paint inspector should be conducted. You cannot allow a child under the age of 6 to move into or remain in a unit that has lead-based paint.

? *Is a month-to-month lease ok?*

Yes, it is ok, as long as the lease is written. However, longer term leases are highly preferable.

? *If an eviction has already been filed, can the cost of cleaning up that eviction be considered part of rent assistance?*

Yes, if it results in preventing homelessness for the household.

CHIN

? *Are CHIN licenses per person, or per computer?*

Per person.

? *The application talks about tracking staff time in CHIN. Can you say more about that?*

As each staff member works directly with a household, or works on behalf of a specific household, the staff member will need to record the amount of time they spent doing that work, on a given day, in quarter-hour increments. This tracking of time will not be directly tied to billing, although there should be some reasonable connection to the amount of hours documented in timesheets for direct services. The tracking will give an idea of how much time it takes to work effectively with different households that have differing risk factors and household characteristics.

? *How will Domestic Violence agencies interact with CHIN?*

The rules for HPRP are the same as for Continuum of Care programs. Domestic Violence agencies cannot enter their data into CHIN. However, they must make a separate, aggregate report available to CHIN and the State for incorporation into any federal reports.

? *Will CHIN be conducting trainings for new CHIN users?*

Yes.

? *If a client refuses to have their data entered into CHIN, can we still get reimbursed for the services provided?*

Yes, but you will need to provide alternate documentation.

? *How does staff time get entered into CHIN?*

If it's a contract service being paid as a fee for service, the CHIN record will reflect that service interaction, and the invoice will also reflect the interaction. So, for example, if the

HPRP lead agency contracts with Legal Aid for legal services, the client record would show that the client received one legal service interaction, and the legal services invoice would include that interaction.

If, on the other hand, the services are being provided by a case manager on the lead agency's staff, the case manager would note how much time (in quarter hours) he or she spent with a specific client/household on a specific day. General activities, such as staff meetings and outreach to other agencies, won't go into CHIN. But we do expect there to be some overall balance between timesheets/CHIN data and invoices.

? Does every agency that has HPRP staff have to be on CHIN, or can they feed their information to a single person/agency for data entry?

You can contract with a single agency to enter all of the CHIN data for your community, however that is not best practice. It is preferable to have all HPRP funded positions be CHIN trained and to enter their own data directly. This gives those staff access to all of the information about program participants that is already in CHIN, as well as allowing them to enter their own data. Regional CHIN training will be made available to all new CHIN users.

Ineligible Activities

? Can money be spent for bricks and mortar?

No.

? Can money be spent to assist with mortgages?

No. It also cannot be spent on legal assistance with foreclosure issues. It can be used to assist a household that has already become homeless due to foreclosure.

? What are the ARRA services in the application? Are these HUD programs?

No, the ARRA services are services that were funded through the American Recovery and Reinvestment Act. You are not allowed to use HPRP funds to pay for services that were funded by other parts of the ARRA. For example, ARRA includes substantial funding for employment services, most of which are being coordinated through the Division of Workforce Development within the N.C. Department of Commerce. Since ARRA is paying for employment services through other portions of the act, you cannot use HPRP funds to pay for employment services for your HPRP participants.

Budget

? Is there a limit to the amount of funding that a community can request?

No, the RFA gives guidelines, but they are not lower or upper limits.

? Are matching funds required?

No.

? What if our money only lasts 2 years instead of 3 years? Is that ok?

Yes, we would need to do a budget revision, but it's ok to spend your money faster than you'd originally anticipated. You must spend at least 60% of your funds within 2 years of the date that HUD signs its contract with the State.

? What if we originally only budget for Homelessness Prevention, but later determine that we also need Rapid Re-Housing? Can we make that shift as well?

Yes. It is important that your project team have agencies that can support Rapid Re-Housing activities.

? Will we be able to adjust the projected number of households and people served on our budgets?

Yes, we recognize that at this time you are estimating the number of households and persons served, so you will be able to adjust as it becomes clearer.

? If we give deposit monies to a landlord or utility company, can we require that those funds be returned to the HPRP program after the tenant moves out?

You can, but if you do you will have to track them as HPRP program income and track their uses moving forward. They can only be used in line with HPRP eligible activities.

? Is it at all possible to have some funding advanced?

It is possible and that will be explored on a case by case basis. More information about this will be provided at the kick-off training.

? How quickly do you think we'll get reimbursements from the State?

If all of the documentation is complete, it should be no more than 2 weeks. We will cover this in more detail at the kick-off training.

? Are single people considered households? When we report on the number of households projected to be served and the number of persons projected to be served, that a distinction between families and single people? Or is does that mean how many people are in the households?

From what we can tell so far, it is how many people are in households. Single people count as a household. If we receive different guidance from HUD we will clarify this question.

? My agency has a federally approved cost allocation system for administrative dollars. We could not provide specific document for any staff related to office space and phones. We also cannot provide any specific documentation related to the approved HPRP administrative costs. Can we assume that our cost allocation documentation will suffice for the administrative portion of the budget? And can we claim office space and phones?

Per HUD, no. The invoices to be sent to the Housing Finance Agency as part of the reimbursement process must be documentable and specific to the HPRP program. Per

HUD, the IG's office will be looking for those types of mishaps when they come to NC to audit our program.

Entitlement Communities

? What are entitlement communities?

These are the 7 communities that received a direct HPRP allocation from HUD.

Program Timeline

Is this a one-time program? Or will funding be made available ongoing?

All HUD publications say this is a one-time program. However, HUD has also said that it will be shifting use of Continuum of Care Homeless Assistance Grants to this style of program. We do not have a timeline for that shift.

Tracking Requirements

? Regulations say you have to recertify people every 3 months, but some will only be served for 1-2 months. Will there be something in the grant that will ask us to follow up with them later to track their outcomes?

HUD has not confirmed if they will require tracking beyond the time limits that a household is directly involved with HPRP services. However, best practice would suggest that case managers do periodic follow ups with households that received short term assistance. Post-service follow up will be a good way to evaluate whether or not the right amount of assistance had been provided. Additionally, longer term housing stability may also be tracked by whether or not households show up in the CHIN system as being served by another homeless agency after they received HPRP assistance.

? We're looking at a program for prevention and financial assistance. Do we have to report on jobs created?

You only report the number of jobs that have salaries being paid for with HPRP funds.