

State of Montana 2011 ANNUAL ACTION PLAN AMENDMENT



Governor Brian Schweitzer

Investing in Montana's Communities

DEPARTMENT OF COMMERCE

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Home Investment Partnerships Program

DEPARTMENT OF PUBLIC HEALTH & HUMAN SERVICES

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For the Plan Year
April 1, 2011
through
March 31, 2012

As submitted
to HUD
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Prepared by:

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Substantial Amendment to the Consolidated 2011 Action Plan For the Emergency Solutions Grant (ESG)

General Information

Grantee Name	State of Montana
Name of Entity or Department Administering Funds	Department of Public Health and Human Services
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Amount Grantee is Eligible to Receive*	\$226,377
Amount Grantee is Requesting	

*Amounts are available at <http://www.hudhre.info/index.cfm?do=viewGrantAwards>

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According to the 2011 Annual Action Plan,

Montana is the fourth largest state, encompassing more than 147,000 square miles -- 607 square miles more than Maine, South Carolina, West Virginia, Maryland, Hawaii, Massachusetts, Vermont, New Hampshire, and Delaware combined. Eastern Montana had been experiencing a decline in population¹, but recently has experienced dramatic change in population and overall community needs directly related to the increased oil production in Eastern Montana. The extreme diversity in the available infrastructure and housing, age of housing stock, and overall range in population complicate the assessment of the type and degree of housing and community development needs².

¹ *Economic and Demographic Analysis of Montana, Volume II Demographic Analysis*, Montana Department of MDOC, December 2007; <http://housing.mt.gov/content/CP/docs/CPDocsAndRpts/CP08EDVol2.pdf>

² Source: Montana Consolidated Plan, Annual Action Plan 2011. <http://housing.mt.gov/content/CP/docs/CPDocsAndRpts/CPAAP11HD1.pdf>.

Overview

This document is the Substantial Amendment to the State of Montana Consolidated Plan Annual Action Plan (2011). The amendment addresses the second round of funding provided through the Department of Housing and Urban Development (HUD) Emergency Solutions Grant (ESG) Round 2 funding mechanism. This document has been organized by the categories HUD required for the ESG Substantial Amendment.

1. SF-424 (Placeholder included for the SF-424 and ESG Certifications, which will be submitted to HUD with the final document)
2. Summary of Consultation Process
3. Matching Funds
4. Proposed Activities for Round 2 ESG
5. Written Standards for Provision of ESG Assistance
6. The Process for ESG Round 2 Awards
7. Homeless Participation Requirement
8. Required Performance Standards

The Emergency Solutions Grant program (ESG/Solutions) is administered by the Montana Department of Public Health and Human Services Intergovernmental Human Services Bureau to help Montana's network of Human Resource Development Councils (e.g., Community Action Agencies) provide emergency assistance, services and shelter for families and individuals who are homeless or at imminent risk of homelessness.

The McKinney-Vento Homeless Assistance Act as amended by S. 896, the *Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act*, was signed into law in 2009. The HEARTH Act updated the definition of homelessness, increased the required level of coordination and collaboration between the ESG Grantee and local Continua of Care, required adoption of performance and outcomes measures, and encouraged Grantees to build on the successful homelessness prevention and rapid rehousing strategies developed through the American Recovery and Reinvestment Act (ARRA) Homelessness Prevention and Rapid Rehousing Program (HPRP). (Note: Montana has a single Continuum of Care, which covers the "Balance of State.")

The second 2011 allocation of Emergency Solutions Grant funds come pursuant to an initial allocation of funds disbursed under the requirements of the previous Emergency Shelter Grant. The second allocation will be disbursed following implementation of the Substantial Amendment to the Consolidated Plan Annual Action Plan. These funds will primarily be used to carry out activities consistent with those implemented under the Homelessness Prevention and Rapid Rehousing Program, which have been formalized in the new ESG/Solutions.

1. SF-424

- Attached.

2. Summary of Consultation Process

HUD specifies that this section describe how the recipient consulted with the Continuum of Care on:

- *Determining how to allocate ESG funds for eligible activities;*
- *Developing the performance standards for activities funded under ESG; and*
- *Developing funding, policies, and procedures for the operation and administration of the HMIS.*
- *Determining how to allocate ESG funds for eligible activities*

The mission of the Human and Community Services Division (HCSO) of the Montana Department of Public Health and Human Services (MT-DPHHS) is to support the strengths of families and communities by promoting employment and providing the assistance necessary to help families and individuals meet basic needs and work their way out of poverty. Through a variety of mechanisms, the HCSO provides cash assistance, employment training, the Supplemental Nutrition Assistance Program (SNAP), Medicaid, childcare, meal reimbursement, nutrition training, energy assistance, weatherization, and other services to help families move out of poverty and toward self-support. The HCSO is home to the Intergovernmental Human Services Bureau (IHSB), which administers the Federal Community Services Block Grant (CSBG) to fund local projects aimed at addressing the causes of poverty, Emergency Shelter Grant (ESG/Shelter) to help local emergency and transitional homeless shelters, the Emergency Solutions Grant (ESG/Solutions), the Low Income Home Energy Assistance Program (LIHEAP), the Weatherization Program, food commodities distribution, and other safety net programs. One of the mechanisms the IHSB utilizes to ensure equitable distribution of resources designed to ameliorate homelessness is the network of Human Resource Development Councils (HRDCs) (e.g., Community Action Agencies). The HRDCs serve as local recipients of ESG/Shelter, Homelessness Prevention and Rapid Rehousing (HPRP), and ESG/Solutions funds in support of individuals and families who are homeless or at imminent risk of homelessness. The IHSB also provides coordination and support for the Montana Continuum of Care Coalition, the tri-state Housing Opportunities for Persons With AIDS (HOPWA) program that is funded through HUD's competitive grant process, and the (former) Montana Governor's Council on Homelessness.

The **Montana Continuum of Care** (MT CoC) for the Homeless Coalition is a statewide collaboration of diverse homeless service providers, nonprofit organizations, local and State governments. The Coalition was formed to address homelessness throughout Montana's vast geographical area. The Coordinator and Board of Directors for the Statewide Continuum of Care have been deeply engaged in the process of allocating ESG/Shelter and for determining how best to allocate the ESG/Solutions grants funds. In support of distributing ESG/Shelter, HPRP, and ESG/Solutions grants funds, the IHSB utilized the equitable distribution mechanisms that it has used in the past to provide funds for each HRDC district statewide. This is done through an allocation formula based on percent of the statewide population averaged with the local poverty rate. These funds will be allocated using this mechanism, and funds will be used in ways that are consistent with HUD requirements and MT CoC values.

The MT CoC's mission is to maximize the resources focused on overcoming homelessness, to direct the most efficient use of limited resources, and to promote a coordinated system of outreach, referral, information sharing, planning, and service. MT CoC participants are responsible for leveraging resources and providing increased and coordinated services to individuals and families without homes or at imminent risk of homelessness Statewide. Participation in the statewide CoC is open to anyone interested and new members are continually encouraged and recruited. Participants include representatives from local and state government, public housing authorities, regional HRDCs, and other nonprofit organizations engaged with the issues that lead to and sustain homelessness, as well as those providing the housing, shelter and service needed to address homelessness. The MT CoC prioritizes and ranks homeless projects each year and prepares a consolidated, statewide continuum of care application in response to HUD's Notice of Funding Availability (NOFA). Projects originate from local community continuums and state agencies. Project approvals are based upon performance and capacity criteria, local needs and HUD priorities.

Consistent with the overarching strategy used by the Montana CoC and the State IHSB, allocation of ESG/Solutions funds for eligible activities will be left (to the greatest extent possible) to the discretion of local communities. Montana has worked under the philosophy that homelessness is a local problem that must be solved locally. Local communities were asked how they would use the current allocation of resources through ESG/Solutions through a two-stage strategy. A January 2012 Survey Monkey Tool³ was disseminated to HRDC leadership and those who managed the HPRP programs through the HRDCs. This was followed with one-on-one telephone interviews with each of the individuals surveyed to elicit additional feedback on best use of the funds, and to ensure that communities had the greatest opportunity possible to mold the program to meet the needs of the individual community.

Developing the performance standards for activities funded under ESG

The State IHSB work with the Statewide CoC, and will ask for their input as performance standards are developed. The goal is to begin drawing on the expertise of the members of the CoC to articulate performance standards for activities funded under ESG/Solutions. Allowable activities have been defined by HUD, as were base performance standards. The CoC process detailed below will refine and focus the standards.

Montana has been collecting HMIS data since May 2005. The MT CoC is in the process of converting Point-in-Time and HMIS performance data from the CoC, HPRP and ESG programs into tables specifically designed for use in performance assessment and outcomes planning. The CoC and IHSB will convene community and Statewide facilitated workshops to help participants understand the data, and to begin identifying viable performance standards. The estimated timeline for completion of these sessions is September 2012.

On the basis of the information extracted from HMIS data, local providers will be asked how best to translate the baseline data to their programs. The second step of the process will be to add identifiers, and to set performance improvement goals. These will vary by grantee, by program and by community. The information extracted from the data will provide an opportunity to identify areas where performance can be improved, and allow the CoC and local communities to monitor preliminary objectives over the next year.

³ See Appendix A: Survey Monkey Tool and overview of responses

Developing funding, policies, and procedures for the operation and administration of the HMIS

One Continuum of Care covers all of Montana, with one agency, the Intergovernmental Human Services Bureau of the Montana Department of Public Health and Human Services, acting as the lead HMIS agency. The IHSB oversees the HMIS system, trains users, provides troubleshooting, and serves as the central portal for collection and dissemination of data.

The Intergovernmental Human Services Bureau established initial HMIS guidelines some time ago and further refined the measure to incorporate HPRP requirements. Since ESG/Solutions has incorporated many of the HPRP components, minimal work should be required to ensure that Montana's HMIS is compliant with the new ESG regulations. We commit to doing so and to requiring that all sub grantees do so, as well.

3. Summary of Consultation Process

Summary of Citizen Participation Process

The State of Montana followed the approved Citizen Participation Plan Guidelines for amending the Consolidated Plan with regard to eliciting public input on a Substantial Amendment.

- Posting dates, times and locations were posted on the Discovering Montana Calendar of Events: <https://app.mt.gov/cal/html/event?eventCollectionCode=comm;>
- The amendment was posted on the website and the Department of Commerce Housing Division
 - A draft of the Substantial Amendment was readily available on-line for public comment for a period of 30 days. (<http://housing.mt.gov/cp/cpdocuments.mcpX>)
 - Comments were accepted at the hearing in Helena, Montana and in writing.
- Notification and a request for comments was sent to several statewide listservs, with a request that recipients forward to their readerships and members:
 - Human Resource Development Council (HRDC) Directors Association
 - Statewide Continuum of Care
 - Montana Coalition for the Homeless Listserv
 - Montana Re-entry Committee
 - Consolidated Plan Listserv

The phone number, including the TDD number, and address of the MDOC Housing Division was included to assist those persons otherwise unable to locate complete copies of the Annual Action Plan and the Five-Year Strategic Plan. The Internet is used as a ready access to the Consolidated Plan documents located here:

[http://housing.mt.gov/CP/cpdocuments.mcpX.](http://housing.mt.gov/CP/cpdocuments.mcpX)

- *Public Comment Received*

Summarized comment: One comment was received applauding the transition from Emergency Shelter Grant to the new Emergency Solutions Grant and are appreciative of the flexibility of the new grant so that communities can choose which eligible activities they will undertake to make the greatest impact on preventing homelessness and re-housing those who are homeless. Unfortunately the amount of funding allocated for this grant is nowhere near what is needed to address the needs in our communities. It will be a “drop in the bucket” instead of filling the bucket of needs. In order for this program to be effective, it needs to be funded adequately, not at the levels detailed in this plan.

Response: The Emergency Solutions Grant funds received are determined after HUD has used a formula designed and applied by them, and is subject to the funds appropriated by Congress.

- *Summarize the comments or views not accepted and include the reasons for not accepting those comments or views* – No other comments were received.

4. Match

Dollar-for-dollar match is required for ESG/Solutions funds. The matching requirement may be met by one or both of the following: Cash contributions expended for allowable costs, and/or noncash contributions, including the value of any real property, equipment, goods, or services contributed to the ESG/Solutions program. To calculate the amount of noncash contributions, the recipient must use a method reasonably calculated to establish the fair market value of the contribution. Sub grantees were asked how they intend to meet the match requirement. Their answers follow.

Match will equal the ESG allocations to each of the HRDCs, per the following.

Agency	Source of Match	Allocation
Action for Eastern Montana	Shelter volunteer hours and donations for the two shelters we service	\$15,413
District 4 Human Resources Development Council	Donations of food and furniture, State wages, United Way funds	\$6,014
Opportunities, Inc.	United Way funds, local community cash donations	\$24,263
District 6 HRDC	Client match, clearinghouse connections (emergency program) match, state waiver for small agencies)	\$4,275
District 7 HRDC	Contributed services	\$32,962
Rocky Mountain Development Council	Employee salary to run program	\$13,388
Human Resource Development Council, IX	Foundations and grants	\$20,273
Community Action Partnership of NW MT	Mostly with cash contributions from clients assisted	\$30,644
District XI Human Resource Council	United Way; local contributions	\$32,563
HRC, District XII	Cash grant from local government	\$14,931

Match and ESG/Solutions funds will be used to support homelessness prevention and rapid rehousing activities. As projected by the State's HRDCs, who serve as the Sub grantees for these funds, the breakdown is estimated to be as follows.

5. Proposed Activities and Overall Budget

A. Proposed Activities

1. *corresponding priority needs from recipient's Annual Action Plan*

According to Montana's 2011 Annual Action Plan:

The priority needs outlined in the 2011 Annual Action Plan⁴ address a variety of needs for affordable housing, community and economic development, and were developed from local input across the State. The plan represents a wide array of needs; while one community may need rental housing production at a particular site, another community may need homeowner rehabilitation over scattered sites. For the state to address its community needs, the three formula grant programs need a level of flexibility for eligible activities to be undertaken.

The limited availability of resources and the extent of community development and housing needs require each of the three formula grant programs to develop its own methods to address priority needs and geographic distribution. More importantly, the state firmly believes that it is up to each locality, through detailed local analyses, studies and needs assessments, to determine its own area(s) of highest need. The state reserves the right to make a determination of local need based on local analyses, studies, and needs assessments, which may override the state's priority level for any given activity identified in the Consolidated Plan. Source:

<http://housing.mt.gov/content/CP/docs/CPDocsAndRpts/CPAAP11HD1.pdf>.

Priority needs around homelessness, as translated into the *Specific Annual Objectives*, are reflected below.

- DH-2.3: Using HOME funds, address the need for affordable decent housing by offering tenant-based rental assistance (TBRA) to low- and very low-income households: 50 homeless/chronically homeless households
- DH-2.4: Using HOME funds, address the need for affordable decent housing by offering assistance for the acquisition, rehabilitation and new construction of rental housing to serve low- and very low-income households: ensure that 115 rental units meet Section 504 standards and qualify as Energy Star, and that some are designated for persons with HIV/AIDS, persons who are chronically homeless, persons/families that are homeless.
- DH-2.6: *Using ESG funds, address the need of families facing the possibility of homelessness by providing one-time payments for utilities, rent or deposits through homeless prevention programs and services: ensure that 6,000 individuals receive one-time payments for utilities, rent, or deposits for families facing eviction/shut-off or foreclosure or to provide security deposits to enable families to move into a dwelling of their own.*
- SL-1.5: *Using ESG funds, enhance suitable living environment through availability and accessibility of the central services for the homeless: ensure that 220 persons have improved or new access to the public facility or receiving a service provided by the public facility that is no longer substandard.*

Montana's intent for the ESG/Solutions funds is completely consistent with the State's Annual Action Plan, particularly Objectives DH-2.6, and SL-1.5, included above. The allowable activities for the ESG/Solutions funds directly address two specific objectives of Montana's Annual Action Plan: DH -2.6, which focuses on the needs of families facing homelessness by providing one-time payments for homelessness prevention; and SL-I .2, which improves access to essential services. Both will be integral components of Montana's use of the ESG/Solutions funds. DPHHS is an active and important participant in the development of the Consolidated

⁴ Available at: <http://housing.mt.gov/CP/cpdocuments.mcp>

Plan and will ensure that HPRP funds are used to advance the specific objectives identified in that document. To this end, the funds will be used to provide homelessness prevention and rapid rehousing solutions that include rent and utility assistance, deposits, relocation services, and the case management needed to assist with stabilizing individuals and families who are coming out of situations of homelessness (or who are at imminent risk of homelessness). The State fosters and supports local control with regard to determining which of the allowable activities will be most effective for any given community. The State, as Grantee, ensures that the activities are allowable and in keeping with the intent of the ESG/Solutions grant. Homelessness in Montana has many different faces, and appropriate strategies vary from community to community. That said, the State as Grantee, will require communities to engage in a comprehensive communitywide process as ESG/Solutions comes fully online over the course of the next fiscal year.

Activities, as projected by the State's HRDCs (the Sub grantees) and the State as Grantee, follow by category.

Breakdown by HRDC and Use of ESG/Solutions Funds by Category in Dollars and Category by Percent							
District	HMIS	Rapid Rehousing		Prevention		Admin	Totals
		Rental Assistance	Relocation & Stabilization	Rental Assistance	Relocation & Stabilization		
Districts 1-3		\$6,000	\$5,000	\$2,000	\$986	\$1,427	\$15,413
District 4		\$3,547		\$1,091	\$819	\$557	\$6,014
District 5		\$14,265		\$7,752		\$2,246	\$24,263
District 6		\$582	\$1,357	\$582	\$1,358	\$396	\$4,275
District 7		\$8,848		\$18,054	\$3,009	\$3,051	\$32,962
District 8		\$6,075		\$6,074		\$1,239	\$13,388
District 9		\$7,358		\$11,038		\$1,877	\$20,273
District 10		\$8,342	\$5,561	\$8,343	\$5,561	\$2,837	\$30,644
District 11		\$4,925	\$9,850	\$4,925	\$9,849	\$3,014	\$32,563
District 12		\$3,388		\$6,773	\$3,388	\$1,382	\$14,931
State	\$22,638					\$9,011	\$31,651
Totals	\$22,638	\$63,658	\$20,896	\$68,140	\$24,008	\$27,037	\$226,377
Percent of Total	10%	28%	9%	30%	10%	12%	100%

Projected numbers of families and individuals who will receive services under ESG/Solutions follow.

ESG/Solutions	Families	Individuals
Districts 1-3	10 to 15	
District 4	2 to 5	5 to 15
District 5	52	210
District 6	4	7
District 7	35	105
District 8	15	45
District 9	250	250
District 10	10	10
District 11	200	500
District 12	5	5
Total Estimated	586	1,142

Sub grantees will serve persons and families who are homeless or at imminent risk of homelessness. During the one-on-one interviews, sub grantees were asked to describe who they would serve using the ESG/Solutions funding. Some of the specific answers are quoted below.

- *We plan on helping a variety of folks. We did not spend a lot of time helping persons who were chronically homeless with HPRP because we aren't going to be successful with them. We looked at the bell curve and decided to help the people in the middle. We targeted the people we could help and keep out of homelessness. – Northwest Montana (District 10 HRDC)*
- *The family: individual ratio for HPRP was 49:51 percent. We also served approximately the same number of males and females. This community is predominantly White, but all of those served had incomes of 50 percent or less of Area Median Income (AMI). We serve veterans, seniors, and people with disabilities. (District 9 HRDC)*
- *The sub grantees will serve very, very low income (incomes of 30 percent or less of AMI). Using our experience with HPRP as a basis for these projections, we will primarily serve families. (Montana CoC)*
- *The people served are living on low incomes (less than 30 percent of AMI). We serve people who are homeless or would be homeless without our help. Demographically, 80 percent of persons will be White, with a Native American population, and less than 3 percent Black and Hispanic. This is consistent with the racial breakdown of the community. (Opportunities Inc. – District 5 HRDC)*
- *We will remain aligned with HUD categories – those served will be people at high risk of becoming homeless. Those who are homeless, or who are experiencing chronic homelessness, and have incomes of less than 30 percent AMI. We will do barrier assessments and screening to make sure people fit these categories. (District 6 HRDC)*
- *We will serve families in need. Most of what we do will be homelessness prevention, often for people who have had a medical crisis or lost a job. Relative to essential services, we often assist people with moving into apartments. There is no real income requirement, but we want to know that they can continue to pay rent. We anticipate working with more veterans in the coming year. We serve a 5-county area, and our population includes many Native Americans who are in crisis or homeless and who are coming from shelters. (District 7 HRDC)*
- *Anyone who walks in and qualifies, which means that they're living on low incomes, are going to be homeless or are homeless. (District 4 HRDC)*
- *We will serve a mixed demographic based on our experience with HPRP. (District 12 HRDC)*

Corresponding standard objective and outcome categories

The ESG/Solutions Grant will support activities that improve the range of housing options for persons and families who are homeless or at imminent risk of homelessness, including activities that fall within the range of allowable homelessness prevention and rapid rehousing activities.

Start date and completion date

ESG/Solutions FFY 2011 Phase II funding must be fully expended within 24 months of the date HUD signs the amendment. At this time, the State of Montana anticipates that at least 75 percent of the Phase II ESG/Solutions funds will be expended in State Fiscal Year 2013 (July 1, 2012 through June 30, 2013) and 100 percent of the funds will be expended by March 1, 2014.

ESG and other funding amounts

Sub grantees have provided input into how they anticipate using their ESG/Solutions (Phase II) funding and match, per the matrix on page 13. Collectively, 38 percent of the funds will be used for Rapid Rehousing (including 29% for rental assistance, 6% for other housing costs such as deposits, and utilities, and 3% for relocation and stabilization services). An additional 40 percent of funds will be used for prevention, including rental assistance (30%), additional housing costs (5%), and relocation and stabilization (5%). HMIS will be funded at 10% of the total allocation, and the balance will be used for allowable administrative costs.

1. *one or more performance indicators*
2. *projected accomplishments, in accordance with each indicator, to be made within one year*
3. *projected accomplishments, in accordance with each performance indicator, to be made over the period for which the grant will be used for that activity*

Questions A) 5 – 7 have been addressed in the following matrix. *Note: Prevention services are projected to be used for approximately 48% of persons served, and rapid rehousing services will be used for the remaining 52%. Providers estimated that they would serve approximately 1,142 persons (586 households) with the ESG/Solutions funds over the life of the grant.*

Performance Indicator	Projected Accomplishments (1 Year)	Projected Accomplishments (24 months – Grant Life)
Number of people rehoused	274	571
Number of people prevented from becoming homeless	297	594
Number of people who retain their housing for at least 6 months after ESG/Solutions assistance	92% (525 persons)	92% (1,051 persons)
Number of ESG/Solutions participating households who obtain access to other appropriate services (e.g., medical, dental, behavioral health treatment, local resources)	75% (220 households)	75% (440 households)
Number of ESG/Solutions participants in homelessness prevention and rapid rehousing services who improve their income (e.g., SSI/SSDI, TANF, SNAPs, Medicaid, employment)	25% (73 households)	25% (146 households)

Discussion of Funding Priorities

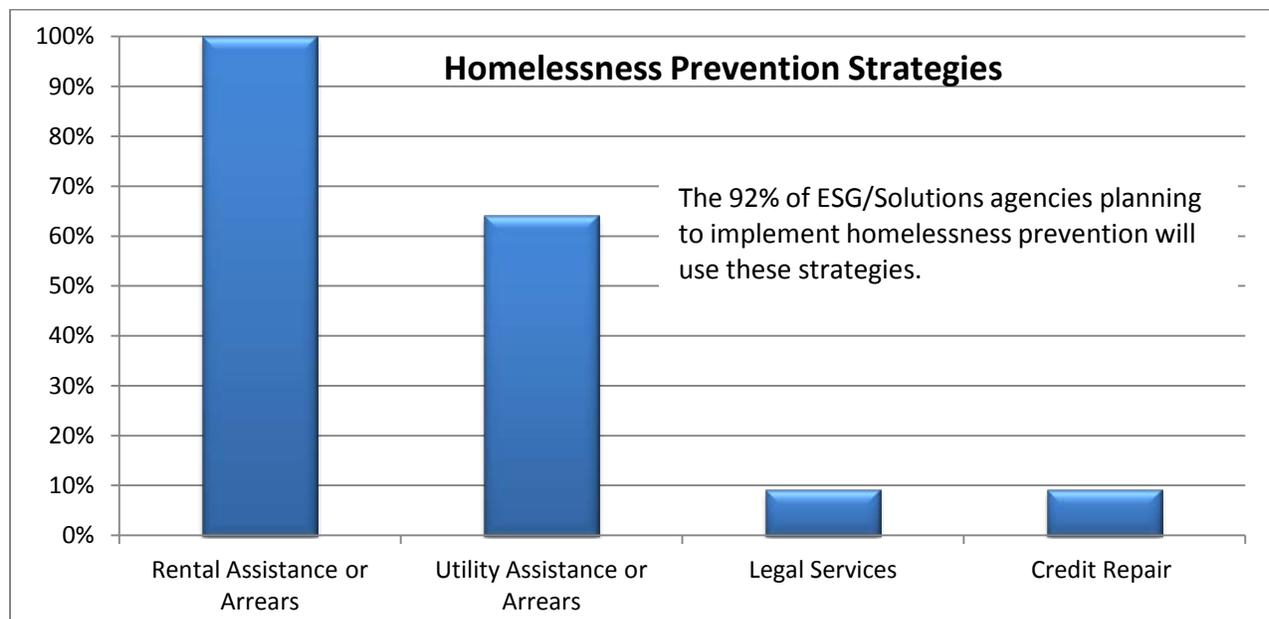
Montana has chosen to rely upon the expertise of local sub grantees for direction on how to prioritize the funding allocated under ESG/Solutions (2011 Phase II). According to the HRDCs that will administer the funds locally, priorities are based upon the successful activities accomplished under the Homelessness Prevention and Rapid Rehousing (HPRP) grant. All of the sub grantees for ESG/Solutions were also sub grantees for the HPRP allocation. They are perfectly positioned to refine and further the homelessness prevention and rapid rehousing activities by acting on lessons learned. Sub grantees are cognizant of HUD’s preference that funds be spent on rapid rehousing but also recognize that prevention is a critical part of any effective strategy in their particular service areas.

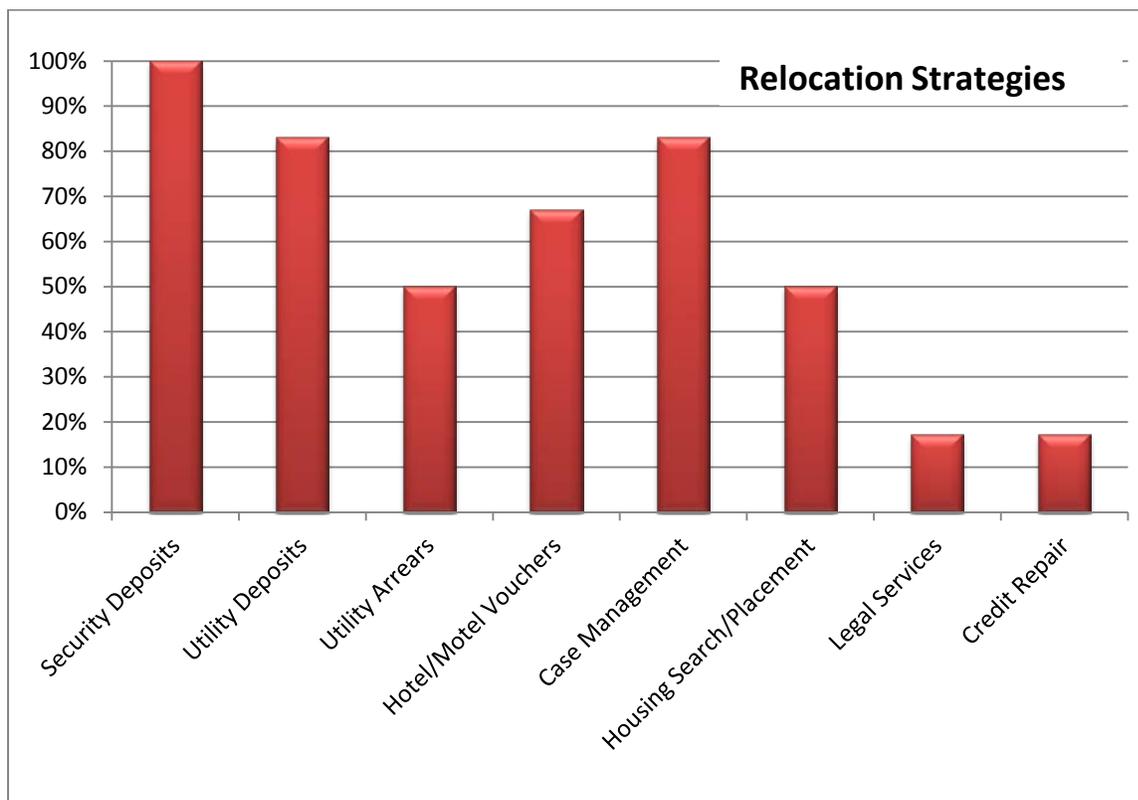
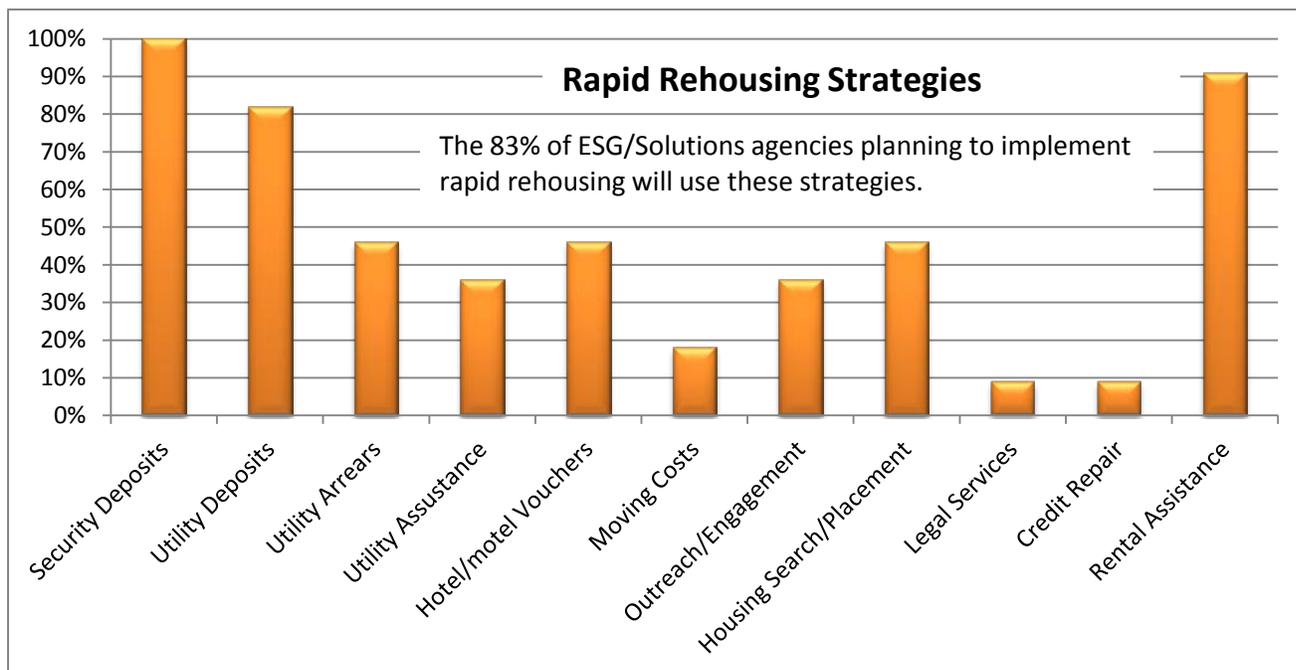
According to the results of the Survey Monkey tool distributed to the sub grantees:

- 92% of the HRDCs will use ESG/Solutions funds for homelessness prevention activities, including rental assistance/arrears (100%); utility assistance/arrears (64%), legal services (9%), and credit repair (9%).
- At least 83% of HRDCs will use ESG/Solutions funds for rapid rehousing activities (with an additional 17% unsure); including security deposits (100%), utility deposits (82%), rental assistance (91%), and other rapid rehousing related services.
- At least 33% will use ESG/Solutions funds for relocation activities (with an additional 25% unsure), including security deposits (100%), utility deposits (83%), hotel/motel vouchers (67%), housing search and placement (50%), and other relocation-related services.

Five of the HRDCs noted that they would not provide some of the services under ESG/Solutions that they had provided under HPRP, even though they are allowable activities. Primarily these were services that could be provided through other means, including utility assistance/arrears, and motel/hotel vouchers.

Proportionately, homelessness prevention, rapid rehousing, and relocation services are anticipated to be provided in the following ways.





As many as 58% of ESG/Solutions agencies may use relocation strategies, as detailed in the chart above.

Obstacles to addressing underserved needs in the community

The lack of long-term Section 8 vouchers and Housing Authority resources continues to be a major obstacle to ensuring that families can access and maintain adequate housing. According to *Out of Reach 2012*, a publication by the National Low Income Housing Coalition:

The Fair Market Rent (FMR) for a two-bedroom apartment is in Montana \$655. To afford this rent and utilities – without paying more than 30 percent of the household income on housing – a household must earn \$2,182 monthly or \$26,181 annually. Assuming a 40-hour work week, 52 weeks per year, this translates into a **Housing Wage of \$12.59**.

In Montana, a minimum wage worker earns an hourly wage of \$7.65. In order to afford the FMR for a two-bedroom apartment, a minimum wage earner must work 66 hours per week, 52 weeks per year. Or a household must include 1.6 minimum wage earners working 40 hours per week year-round in order to make the two-bedroom FMR affordable. In Montana, the estimated mean (average) wage for a renter is \$10.16. In order to afford the FMR for a two-bedroom apartment at this wage, a renter must work 50 hours per week, 52 weeks per year⁵.

Sadly, people who are living on very low incomes, those who have disabilities or limited job skills, are at the mercy of the chasm between affordable housing and the amount of money they can reasonably earn at minimum wage. The public safety net has

How funding priorities will support the national priorities established in *Opening Doors: Federal Strategic Plan to Prevent and End Homelessness*

These funding priorities support the national priorities established in *Opening Doors* in several ways.

- By ensuring that people are quickly rehoused or preventing them from becoming homeless in the first place, the funding priorities support Objective #3 of the Plan: *Provide affordable housing to people experiencing – or most at risk of – homelessness.*
- These funding priorities also support Objective #6: *Improve access to mainstream programs and services to reduce people's financial vulnerability to homelessness.* One of the integral components of ESG/Solutions implementation as envisioned for Montana is to improve access to community supports, including income supports and mainstream systems (e.g., SNAPs, LIHEAP, Weatherization, Head Start, behavioral health care, dental and physical health care, and employment.)
- Montana's funding priorities also strongly support Objective #10, *Transform homeless services to crisis response systems that prevent homelessness and rapidly return people who experience homelessness to stable housing.* Rather than trapping people in an endless cycle between homelessness and of emergency or transitional shelter, these funding priorities ensure immediate linkages to permanent supportive housing and the supports needed to sustain that housing. This is a win-win for Montana, for Montana's communities, and for the people who are able to remain stably housed.

⁵ Out of Reach 2012: Montana. National Low Income Housing Coalition. Accessed online 4/3/2012 at: <http://nlihc.org/oor/2012/MT>.

B. Detailed Budget

Form from: www.hudhre.info/.../ESGSubstantialAmendmentNotice_%20Tables1and3.xlsx

FY 2011 Detailed Budget Table					
First Allocation	401,022	FY 2011 Emergency Shelter Grants/Emergency Solutions Grants Program Allocations			
Second Allocation	226,377				
Grant Amount	627,399				
Total Admin.	47,055				
		First Allocation		Second Allocation	Total FY 2011
	Eligible Activities	Activity Amount	Reprogrammed Amount	Activity Amount	Activity Amount
Emergency Shelter Grants Program	Homeless Assistance	\$0.00	\$0.00		\$0.00
	<i>Rehab/Conversion</i>				\$0.00
	<i>Operations</i>	202,090			202,090
	<i>Essential Services</i>	81,006			81,006
	Homelessness Prevention	97,875			97,875
	Administration	20,051			20,051
	Emergency Shelter Grants Subtotal	401,022	\$0.00		401,022
Emergency Solutions Grants Program	Emergency Shelter**			\$0.00	\$0.00
	<i>Renovation**</i>			\$0.00	\$0.00
	<i>Operation**</i>			\$0.00	\$0.00
	<i>Essential Service**</i>			\$0.00	\$0.00
	<i>URA Assistance**</i>			\$0.00	\$0.00
	Street Outreach - Essential Services**			\$0.00	\$0.00
	HMIS			22,638	\$0.00
	Rapid Re-housing			84,554	\$0.00
	<i>Housing Relocation & Stabilization</i>			20,896	\$0.00
	<i>Tenant-Based Rental Assistance</i>			63,658	\$0.00
	<i>Project-Based Rental Assistance</i>				\$0.00
	Homelessness Prevention			92,148	\$0.00
	<i>Housing Relocation & Stabilization</i>			24,008	\$0
	<i>Tenant-Based Rental Assistance</i>			68,140	\$0
	<i>Project-Based Rental Assistance</i>				\$0.00
Administration			27,037	\$0.00	
	Emergency Solutions Grants Subtotal		\$0.00	\$0.00	\$0.00
			Total Grant Amount:	226,377	\$0.00

**Allowable only if the amount obligated for homeless assistance activities using funds from the first allocation is less than the expenditure limit for emergency shelter and street outreach activities (see Section III.B. of this Notice).

6. Written Standards for Provision of ESG Assistance

- *If the recipient is a State: include written standards for providing the proposed assistance or describe the requirements for sub-recipients to establish and implement written standards.*

Montana developed a written *Policies and Procedures Manual* for the Homelessness Prevention and Rapid Rehousing Program, which will be used as the foundation for the ESG/Solutions Grant (Phase 2, 2011) Program. (The manual has been attached as Appendix B.) Sub grantees were given the option of using the State standards, creating their own written standards, or using a hybrid version of the two. When asked how they had approached the requirement for written standards for HPRP, 91 percent of respondents stated that they had established agency-level written policies for use of the funds. When asked how they would approach the need for written standards for the ESG/Solutions grant, 55 percent of respondents to the Survey Monkey tool (Appendix A) noted that they intend to use the State-produced standards, 58 percent intend to use a hybrid of agency and State standards, and 64 percent anticipate coming up with their own written policies for use of the ESG/Solutions funds. As noted throughout this document, local control of these programs has been supported and encouraged. All standards must comply with appropriate HUD, McKinney-Vento, CFR, Circulars, Single Audit Act Amendments of 1996 regulations and guidance. The HPRP Policies and Procedures Manual will be used as the template for the State's ESG/Solutions regulations. The State IHSB will work with the HRDCs to ensure that the new ESG manual effectively addresses all required components. Time constraints prevented us from having a finalized set of standards to include with this Substantial Amendment.

- a. Standard policies and procedures for evaluating individuals' and families' eligibility for assistance under ESG.

Section 2-3 of the *HPRP Policy and Procedures* manual covers Income Eligibility, and Section 2-4 covers Housing Status Eligibility for individuals and families. Section 13-0 Forms includes the following forms for use in determining eligibility: Staff Certification of Eligibility for HPRP Assistance; HPRP Self-Declaration of Income; HPRP Homeless Certification; and HPRP Self-Declaration of Housing Status. Section 14-0 includes HPRP Eligibility Determination and Documentation Guidance.

The HPRP Policies and Procedures Manual also incorporates the HPRP Eligibility Determination and Documentation Guidance issued by HUD and revised March 17, 2010. This document also includes guidance on eligibility requirements. Sub grantees will be required to articulate their standards for evaluating eligibility, unless they choose to rely on the State's guidelines.

- b. Policies and procedures for coordination among emergency shelter providers, essential service providers, homelessness prevention and rapid re-housing assistance providers, other homeless assistance providers, and mainstream service and housing providers.

The ESG/Solutions grantee is the MT Department of Health and Human Service (DPHHS). The DPHHS designed the HPRP (previously) and ESG/Solutions (current) programs' coordination with the Statewide and local CoCs. As noted earlier in this document, DPHHS selected Community Action Agencies (CAAs) to serve as the ESG/Solutions sub grantees because of their integral connections to local poverty-related and social safety net programs. DPHHS requires the CAAs to coordinate at the State and local planning levels, and to work within context of referral networks that include essential service providers, homelessness

prevention/rapid rehousing providers, emergency shelter providers, as well as mainstream services and housing providers. Most recently, these efforts have included coordination with the VASH Vouchers assigned to Montana. There are now 54 statewide HUD VASH vouchers administered by the Montana Department of Commerce, Housing Division, and an additional 28 vouchers administered by Billings Public Housing Authority. Both agencies are also CoC grantees that have actively leveraged Shelter + Care (S+C) and HUD/VASH to maximize availability.

Included in the standards written specifically for ESG/Solutions will be a requirement that sub grantees develop a program design that is inclusive of other targeted homeless services and mainstream resources such as public housing programs, programs receiving project-based or tenant-based Section 8, Supportive Housing for persons with disabilities (Section 811), HOME Investment Partnerships Program, Temporary Assistance for Needy Families (TANF), State Children’s Health Insurance Program, Head Start, Mental Health and Substance Abuse Block Grants and services funded under the Workforce Investment Act. The IHSB encourages programs to be strategic and comprehensive in their program design by requiring applicants to include all available resources to the maximum extent practicable.

- c. Policies and procedures for determining and prioritizing which eligible families and individuals will receive homelessness prevention assistance and which eligible families and individuals will receive rapid rehousing assistance.

The HPRP Policies and Procedures Manual incorporates the HPRP Eligibility Determination and Documentation Guidance issued by HUD and revised March 17, 2010. This document will be used as a foundation for the ESG/Solutions program as implemented, and includes clear guidance in chapters 3 (Income Eligibility), 4 (Housing Status Eligibility) and 5 (Documentation) for determining and prioritizing which families/individuals receive prevention assistance, and which receive rapid rehousing assistance. As noted earlier, 55 percent of respondents to the Survey Monkey tool (Appendix A) noted that they intend to use the State-produced standards, 58 percent intend to use a hybrid of agency and State standards, and 64 percent anticipate coming up with their own written policies for use of the ESG/Solutions funds

- d. Standards for determining the share of rent and utilities costs that each program participant must pay, if any, while receiving homelessness prevention or rapid rehousing assistance.
- e. Standards for determining how long a particular program participant will be provided with rental assistance and whether and how the amount of that assistance will be adjusted over time.
- f. Standards for determining the type, amount, and duration of housing stabilization and/or relocation services to provide a program participant, including the limits, if any, on the homelessness prevention or rapid re-housing assistance that each program participant may receive, such as the maximum amount of assistance, maximum number of months the program participants receives assistance; or the maximum number of times the program participants may receive assistance.

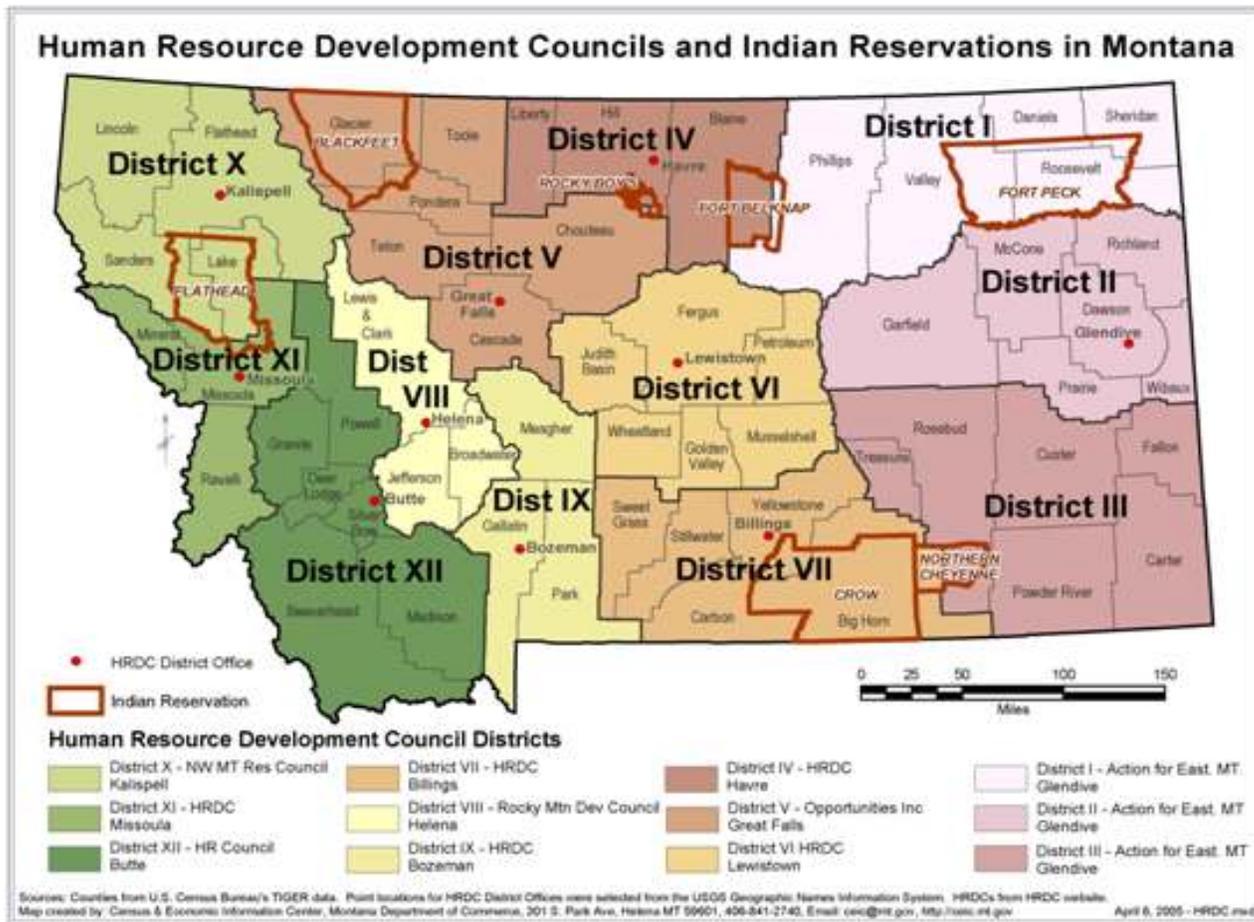
In the case of d—f, above, the particular standards described will be left to local discretion. For purposes of the HPRP, some required a co-payment, or offered declining subsidies over the period of assistance. There were various local guidelines that spoke to the type, amount, and duration of assistance, within the general requirements of the program. For purposes of ESG/Solutions implementation, sub grantees will be required to articulate these standards as part of the written standards adopted for this program, and the State will issue guidelines that can be adopted for agencies that do not wish to create their own.

7. Process for Making Sub-awards

The Community Services Block Grant (CSBG) is a Federal anti-poverty program and, in Montana, these funds are managed by ten sub grantees, all of which are Community Action Agencies or Human Resource Development Councils (HRDCs). HRDCs, by State and Federal law, are charged with identifying and addressing the issues that lead to and sustain poverty within multi-county districts. Ending homelessness has been an important part of their mission since well before the enactment of the American Recovery and Reinvestment Act. Each HRDC receives funding based upon a formula that is mandated by the Administrative Rules of Montana (MCA 53-10-502). The formula reflects a ratio of each HRDC's share of the State's poverty and general population. The State, as Grantee, holds that using the CSBG allocation formula was consistent with the goals and objectives of HPRP. We will use the same approach for distributing the ESG, and as the foundation for making sub-awards.

Formula for Distribution of ESG/Solutions Allocation			
Montana (MCA 53-10-502)			
Agency	% 2010 Population	% in Poverty	Average %: 2010 Poverty and Population
Action for Eastern Montana	7.9%	7.9%	7.9%
District 4 Human Resources Development Council	2.5%	3.7%	3.1%
Opportunities, Inc.	11.9%	13.0%	12.5%
District 6 HRDC	2.2%	2.2%	2.2%
District 7 HRDC	18.6%	15.3%	16.9%
Rocky Mountain Development Council	8.1%	5.6%	6.9%
Human Resource Development Council, IX	10.8%	10.0%	10.4%
Community Action Partnership of NW MT	15.2%	16.2%	15.7%
District XI Human Resource Council	15.5%	17.9%	16.7%
HRC, District XII	7.1%	8.2%	7.7%
Totals	100.0%	100.0%	100.0%

HRDCs have always been the DPHHS sub grantees for ESG/Shelter and CSBG. They have also been active partners in developing and maintaining the Statewide Continuum of Care (COC). In many cases, they also serve as Grantees for the Federal Emergency Management Agency's Emergency Food and Shelter Grants Program. They were the natural conduit for ESG/Solutions funds and activities, particularly since capacity to carry out these activities was created through management of the HPRP funds. This mechanism ensures that local needs are addressed by those who know them best.



8. Homeless Participation Requirement

Though State Grantees are not *required* to include a response to the *homeless participation requirement*, Montana will make every effort to ensure that people with lived experience of homelessness are included at policy and decision-making levels relative to implementing ESG/Solutions. Local sub grantees will also be required to include a formalized plan to engage persons with lived experience of homelessness. One strategy for ensuring this level of participation will be incorporating the Montana Coalition for the Homeless in these efforts.

The Montana Coalition for the Homeless (MTCOH) is a Statewide grassroots nonprofit organization that holds as one of its core tenets that in order to do work effectively on behalf of persons who are homeless or who are at high risk of homelessness, persons who have experienced homelessness must be engaged and empowered in the work, and that persons who have experienced homelessness must be included as participants and as true stakeholders at local, regional and state levels.

It can be very difficult for people who have experienced, are at risk of experiencing, or who are currently experiencing homelessness, to participate for a variety of reasons, so inasmuch as possible, the MTCOH reduces impediments to participation.

The MTCOH by-laws require initiating grassroots Local or Regional Advisory Councils, convened at regular intervals in the home communities of Coalition Board members. Advisory Councils will be comprised of persons who have experienced, are experiencing and/or who have family members who have personal experience with homelessness. Meetings will be well-advertised at the community level, and invitations will be distributed through the various agencies that serve persons who are, or who are at risk of, homelessness. Persons with primary experience of homelessness will also be encouraged to attend Coalition meetings. Through this mechanism, the Coalition Board will provide for meaningful opportunities to provide input on policies, practices, programs and public processes, and factor that input into its decisions. Recommendations offered by Local/Regional Advisory Councils will be brought to the Board of Directors for consideration and/or potential action, either at a regularly scheduled meeting, or at a special meeting called for that purpose.

The MTCOH has Board of Directors representation from virtually every HRDC District, and many of the Board members are also members of the Statewide and local CoCs. HRDCs will be encouraged to connect with the local MTCOH representative(s) and/or the Executive Committee members for assistance with ensuring that persons with lived experience of homelessness have the opportunity to participate in a meaningful way as the ESG/Solutions program is implemented.

9. Performance Standards

Beyond traditional output measures gathered through the Homeless Management Information System (HMIS) (e.g., number of persons in emergency shelter, number of shelter bed nights, number of households receiving homelessness prevention assistance), the Montana Statewide CoC and IHSB of the Montana Department of Public Health and Human Services are in the process of articulating performance standards, indicators and targets, consistent with the goal of ending homelessness. Not all ESG sub grantees will report on all measures. Outcome performance measures will be tailored to the category of ESG activity for which funding is awarded.

Sample performance standards, which will be considered and adjusted to reflect realistic goals based on data analysis of the various homelessness prevention, rapid rehousing, and relocation activities implemented by sub grantees, follow.

- At least 70% of households will have their housing stabilized or be safely rehoused within 28 days.
- 85% of the participating households will continue to be in stable housing at least 90 days following assistance.
- 75% of participating households will continue to be in stable housing 6 months after receiving assistance.
- Sub-recipients using ESGP Prevention funds to place families in short-term emergency motels will ensure that the average motel stay does not exceed 5 days, AND that 90% of households placed in motels meet with a case manager within 3 days.

10. Certifications

Attached: See Appendix C

A. Written standards

For recipients who decide to use part of the second allocation of FY 2011 funds for emergency shelter and street outreach

Not applicable. Montana does not intend to use part of the ESG/Solutions allocation (FY 2011) for emergency shelter or street outreach.

B. Requirements

For recipients who plan to use the risk factor under paragraph (1)(iii)(G) of the “at risk of homelessness” definition. If recipient plans to serve persons “at risk of homelessness,” based on the risk factor “*otherwise lives in housing that have characteristics associated with instability and an increased risk of homelessness:*” describe specific characteristics associated with instability and increased risk of homelessness.”

Using this definition of “at risk of homelessness” will be left to local discretion. If a local subgrantee chooses to utilize this definition, the subgrantee will be required to formalize the specific characteristics associated with instability and increased risk of homelessness in their written standards.

C. Requirements for Optional Changes to the FY 2011 Annual Action Plan**1. Centralized or Coordinated Assessment System**

The State is not considering a centralized or coordinated assessment system beyond the required participation in HMIS data collection and analysis. At least one of the sub grantees is, however, considering a centralized or coordinated assessment and intake system for use with ESG/Solutions. At such time as sub grantees decide to go forward with implementing such a system, they will be required to describe the assessment system within context of their written standards.

2. Monitoring

Montana has an extensive monitoring process in place for programs that include CSBG, ESG, LIHEAP, and other programs under the DHPHS/IHSB umbrella. No substantive changes are anticipated in the monitoring process that has been effectively used for the Emergency Shelter Grant and HPRP. The IHSB plans to use lessons learned from monitoring practices used for ESG/Shelter and HPRP, and incorporate them for the use with monitoring the Emergency Solutions grant.

At this point, DPHHS employs four field supervisors who monitor all sub grantees no less than once a year, using a standardized monitoring instrument. Adequate documentation standards are disseminated to all sub grantees, so that the activities and expenditures carried out under the various programs can be audited. Sub grantees understand what a complete client file must contain, as well as the financial documentation that must be maintained. When field monitors conduct onsite monitoring trips, they review all pertinent information and pull a representative number of client files for in-depth review. The process is designed to identify and correct weaknesses and to highlight strengths. When observations reveal areas that must be strengthened, the IHSB works closely with the individual agency to ensure their ability to comply with all applicable standards.

Appendix A: Survey Monkey Tool and Overview

Attached

Appendix B: HPRP Manual

Attached

Appendix C: Certifications

Attached

Appendix D: SF-424

Attached

Substantial Amendment to the Consolidated Plan:  SurveyMonkey
HPRP

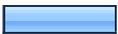
1. Will your agency use Emergency Solutions Grant (ESG) funds for HOMELESSNESS PREVENTION activities?

		Response Percent	Response Count
Yes		91.7%	11
No		8.3%	1
Maybe		0.0%	0
answered question			12
skipped question			0

2. If your agency will use some of the Emergency Solutions Grant (ESG) funds for homelessness PREVENTION, which kind of allowable assistance will you provide? Please choose all that apply.

		Response Percent	Response Count
Rental assistance or arrears		100.0%	11
Utility assistance or arrears		63.6%	7
Legal services		9.1%	1
Credit repair		9.1%	1
Other (please specify)			2
answered question			11
skipped question			1

3. Will your agency use Emergency Solutions Grant (ESG) funds for RAPID REHOUSING activities?

		Response Percent	Response Count
Yes		83.3%	10
No		0.0%	0
Maybe		16.7%	2
answered question			12
skipped question			0

4. If your agency will use some of the Emergency Solutions Grant (ESG) funds for RAPID REHOUSING, which kind of allowable assistance will you provide? Please choose all that apply.

		Response Percent	Response Count
Security deposits		100.0%	11
Utility deposits		81.8%	9
Utility arrears		45.5%	5
Utility assistance		36.4%	4
Hotel/motel vouchers		45.5%	5
Moving costs		18.2%	2
Outreach and engagement		36.4%	4
Housing search and placement		45.5%	5
Legal services		9.1%	1
Credit repair		9.1%	1
Rental assistance		90.9%	10
	Other (please specify)		4
		answered question	11
		skipped question	1

5. Will your agency use Emergency Solutions Grant (ESG) funds for RELOCATION activities?

		Response Percent	Response Count
Yes		33.3%	4
No		41.7%	5
Maybe		25.0%	3
answered question			12
skipped question			0

6. If your agency will use some of the Emergency Solutions Grant (ESG) funds for RELOCATION activities, which kind of allowable assistance will you provide? Please choose all that apply.

		Response Percent	Response Count
Security deposits		100.0%	6
Utility deposits		83.3%	5
Utility arrears		50.0%	3
Hotel/motel vouchers		66.7%	4
Case management		83.3%	5
Housing search and placement		50.0%	3
Legal services		16.7%	1
Credit repair		16.7%	1
Other (please specify)			1
answered question			6
skipped question			6

7. For the new ESG, 5% of your allocation can be used for administrative costs. How much of that 5% do you plan to use?

	Response Count
	12
answered question	12
skipped question	0

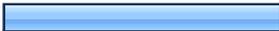
8. Are there any service that were provided under HPRP that you do not intend to continue?

		Response Percent	Response Count
Yes		45.5%	5
No		54.5%	6

If yes, which services will be discontinued and why? 6

answered question	11
skipped question	1

9. How much of your award, if any, do you intend to use each of the following types of activities? Please remember that these are just ESTIMATES, and that you do NOT have to engage in all types of assistance listed. (Though we are not mandating how the funds are used HUD is encouraging use of funds for Rapid Rehousing.)

		Response Percent	Response Count
Rapid Re-Housing—Rental Assistance		100.0%	12
Rapid Re-Housing—Housing		41.7%	5
Relocation and Stabilization Services		33.3%	4
Homelessness Prevention—Rental Assistance		91.7%	11
Homelessness Prevention—Housing		41.7%	5
Relocation and Stabilization Services		50.0%	6
Administration		58.3%	7
answered question			12
skipped question			0

10. Dollar-for-dollar match is required for Emergency Solutions Grant funds. The matching requirement may be met by one or both of the following: Cash contributions expended for allowable costs, and/or noncash contributions, including the value of any real property, equipment, goods, or services contributed to the ESG program. To calculate the amount of noncash contributions, the recipient must use a method reasonably calculated to establish the fair market value of the contribution. How do you intend to meet the match requirement?

	Response Count
	12
answered question	12
skipped question	0

11. Based on your planned use of the new ESG funds (and considering your use of the HPRP funds):

		Response Percent	Response Count
How many families do you plan to serve?		100.0%	12
How many individuals do you plan to serve?		91.7%	11
What services will you offer?		91.7%	11
	answered question		12
	skipped question		0

12. Written standards for providing the proposed ESG assistance will be required. Under HPRP, some agencies used a State-developed manual, and some agencies established internal policies and procedures in addition to the State manual.

	Yes	No	Maybe	Response Count
Did you establish agency-established written policies for use of the HPRP funds?	90.9% (10)	0.0% (0)	9.1% (1)	11
Do you intend to use State-produced written standards?	54.5% (6)	9.1% (1)	36.4% (4)	11
Do you intend to use a hybrid of agency standards and State standards?	58.3% (7)	8.3% (1)	33.3% (4)	12
Do you anticipate coming up with written policies for use of these funds?	63.6% (7)	9.1% (1)	27.3% (3)	11

Please describe the standards you used for HPRP, whether and how the ones used for ESG will vary. 10

answered question	12
skipped question	0

13. What are the performance indicators that you would suggest using to measure effectiveness?

	Response Count
	12
answered question	12
skipped question	0

14. What limits does your agency set on benefits?

		Response Percent	Response Count
What is the maximum amount of monthly assistance a household can receive?		100.0%	12
What is the maximum amount of total assistance a household can receive?		100.0%	12
What is the maximum length of time a household can participate in HPRP assistance?		100.0%	12
What is the maximum number of times participants may receive assistance?		100.0%	12
	answered question		12
	skipped question		0

15. What do you consider the most effective practices of the HPRP program as you enacted it in your community?

	Response Count
	10
answered question	10
skipped question	2

16. What kind of outcomes have you observed among the people who were helped with HPRP?

		Response Percent	Response Count
Were people able to sustain their housing beyond the limit of the HPRP assistance?		100.0%	12
What percentage of people were able to sustain their housing after assistance ended?		91.7%	11
What kind of follow-up practices did you employ after people transitioned from the program?		91.7%	11
What else would you like to tell us?		41.7%	5
		answered question	12
		skipped question	0

17. What accomplishments can you project will be made during the grant period?

		Response Percent	Response Count
...in terms of Homelessness Prevention?		100.0%	10
...in terms of Rapid Rehousing?		100.0%	10
...in terms of relocation or stabilization?		100.0%	10
		answered question	10
		skipped question	2

18. What kind of obstacles do you foresee in implementing the new ESG activities?

	Response Count
	11
answered question	11
skipped question	1

19. As the new ESG rolls out, what recommendations or suggestions do you have to ensure that it is as successful as possible?

	Response Count
	9
answered question	9
skipped question	3

20. Thank you for participating in this Survey. Your answers will be used to create the Substantial Amendment to the Consolidated Plan, so that Montana will be eligible to receive these funds. Rachel Gooen or Sherri Downing will be in touch within a few working days to request a follow-up interview. Please provide your contact information.

		Response Percent	Response Count
Name:	<input type="text"/>	100.0%	12
Agency:	<input type="text"/>	100.0%	12
Address:	<input type="text"/>	100.0%	12
City/Town:	<input type="text"/>	100.0%	12
State:	<input type="text"/>	100.0%	12
ZIP:	<input type="text"/>	100.0%	12
Email Address:	<input type="text"/>	100.0%	12
Phone Number:	<input type="text"/>	100.0%	12
answered question			12
skipped question			0

Q2. If your agency will use some of the Emergency Solutions Grant (ESG) funds for homelessness PREVENTION, which kind of allowable assistance will you provide? Please choose all that apply.

1	Very little would go for legal or credit	Mar 20, 2012 9:12 AM
2	Single Point of Entry Services	Mar 16, 2012 11:11 AM

Q4. If your agency will use some of the Emergency Solutions Grant (ESG) funds for RAPID REHOUSING, which kind of allowable assistance will you provide? Please choose all that apply.

1	Case Management/Eligibility Technician	Mar 28, 2012 10:21 AM
2	We would like flexibility between line items here, w/out prior approval.	Mar 21, 2012 9:41 AM
3	Most will go to rental assistance and utility deposits	Mar 20, 2012 9:12 AM
4	Single Point of Entry Services	Mar 16, 2012 11:11 AM

Q6. If your agency will use some of the Emergency Solutions Grant (ESG) funds for RELOCATION activities, which kind of allowable assistance will you provide? Please choose all that apply.

1	Single Point of Entry Services	Mar 16, 2012 11:11 AM
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Q7. For the new ESG, 5% of your allocation can be used for administrative costs. How much of that 5% do you plan to use?

1	5%	Mar 28, 2012 10:21 AM
2	5%	Mar 27, 2012 3:57 PM
3	100% Of 5%	Mar 22, 2012 9:40 AM
4	We were allotted 9% according to state. Will use all of it.	Mar 21, 2012 9:41 AM
5	0	Mar 21, 2012 8:37 AM
6	0%	Mar 20, 2012 10:32 AM
7	All	Mar 20, 2012 9:12 AM
8	Probably all of it.	Mar 19, 2012 1:00 PM
9	5 percent	Mar 16, 2012 11:11 AM
10	All of it.	Mar 16, 2012 9:03 AM
11	5%	Mar 15, 2012 3:05 PM
12	5%	Mar 15, 2012 1:25 PM

Q8. Are there any service that were provided under HPRP that you do not intend to continue?

1	Utility arrears- most applicants are LIEAP eligible and are receiving LIEAP. They may also be eligible for Energy Share. This is a duplication of services.	Mar 28, 2012 10:21 AM
2	We will not provide utility assistance or utility arrears in Prevention. There are enough programs to help in this cause. LIEAP and Energy Share have helped with most of the past cases and it works better because then they are involved in those programs where they may not have been if the referral was not made in the HPRP office.	Mar 22, 2012 9:40 AM
3	Motel Assistance - we have other funding. Utility Assistance - we have other resources.	Mar 21, 2012 9:41 AM
4	utility payments and credit repair	Mar 21, 2012 8:37 AM
5	We do not expect to receive any more ESG funds as they are distributed through our local HRDC and they have said they have very little money. In the last fiscal year we received approximately \$3300 and they told us not to expect any in the coming year..	Mar 20, 2012 10:32 AM
6	Short term rent assistance, rent arrears, deposits, utility assistance. Will use funds for Single Point of Entry Services.	Mar 16, 2012 11:11 AM

Q9. How much of your award, if any, do you intend to use each of the following types of activities? Please remember that these are just ESTIMATES, and that you do NOT have to engage in all types of assistance listed. (Though we are not mandating how the funds are used HUD is encouraging use of funds ...

Rapid Re-Housing—Rental Assistance

1	25%	Mar 28, 2012 10:21 AM
2	6,000.00 rents	Mar 27, 2012 3:57 PM
3	50%	Mar 22, 2012 9:40 AM
4	65%	Mar 21, 2012 9:41 AM
5	40%	Mar 21, 2012 8:37 AM
6	100%	Mar 20, 2012 10:32 AM
7	25%	Mar 20, 2012 9:12 AM
8	30%	Mar 19, 2012 1:00 PM
9	Single Point of Entry Services	Mar 16, 2012 11:11 AM
10	65%	Mar 16, 2012 9:03 AM
11	10845	Mar 15, 2012 3:05 PM
12	15%	Mar 15, 2012 1:25 PM

Rapid Re-Housing—Housing

2	3,000.00 security deposits	Mar 27, 2012 3:57 PM
4	none	Mar 21, 2012 9:41 AM
8	20%	Mar 19, 2012 1:00 PM
9	Single Point of Entry Services	Mar 16, 2012 11:11 AM
12	15%	Mar 15, 2012 1:25 PM

Relocation and Stabilization Services

2	2,000.00 utility deposits	Mar 27, 2012 3:57 PM
4	none	Mar 21, 2012 9:41 AM
9	Single Point of Entry Services	Mar 16, 2012 11:11 AM
12	20%	Mar 15, 2012 1:25 PM

Homelessness Prevention—Rental Assistance

1	45%	Mar 28, 2012 10:21 AM
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Q9. How much of your award, if any, do you intend to use each of the following types of activities? Please remember that these are just ESTIMATES, and that you do NOT have to engage in all types of assistance listed. (Though we are not mandating how the funds are used HUD is encouraging use of funds ...

2	2,000.00 rents	Mar 27, 2012 3:57 PM
3	50%	Mar 22, 2012 9:40 AM
4	35%	Mar 21, 2012 9:41 AM
5	60%	Mar 21, 2012 8:37 AM
7	70%	Mar 20, 2012 9:12 AM
8	25%	Mar 19, 2012 1:00 PM
9	Single Point of Entry Services	Mar 16, 2012 11:11 AM
10	20%	Mar 16, 2012 9:03 AM
11	21690	Mar 15, 2012 3:05 PM
12	15%	Mar 15, 2012 1:25 PM
Homelessness Prevention—Housing		
2	1,015.00 utilities	Mar 27, 2012 3:57 PM
4	none	Mar 21, 2012 9:41 AM
8	20%	Mar 19, 2012 1:00 PM
9	Single Point of Entry Services	Mar 16, 2012 11:11 AM
12	15%	Mar 15, 2012 1:25 PM
Relocation and Stabilization Services		
1	5% Administration 25% Case Management/Eligibility Tech.	Mar 28, 2012 10:21 AM
4	none	Mar 21, 2012 9:41 AM
9	Single Point of Entry Services	Mar 16, 2012 11:11 AM
10	10%	Mar 16, 2012 9:03 AM
11	3615	Mar 15, 2012 3:05 PM
12	15%	Mar 15, 2012 1:25 PM
Administration		
2	1,430.00	Mar 27, 2012 3:57 PM
4	amount allocated (9%)	Mar 21, 2012 9:41 AM

Q9. How much of your award, if any, do you intend to use each of the following types of activities? Please remember that these are just ESTIMATES, and that you do NOT have to engage in all types of assistance listed. (Though we are not mandating how the funds are used HUD is encouraging use of funds ...

7	5%	Mar 20, 2012 9:12 AM
8	5%	Mar 19, 2012 1:00 PM
10	5%	Mar 16, 2012 9:03 AM
11	1807	Mar 15, 2012 3:05 PM
12	5%	Mar 15, 2012 1:25 PM

Q10. Dollar-for-dollar match is required for Emergency Solutions Grant funds. The matching requirement may be met by one or both of the following: Cash contributions expended for allowable costs, and/or noncash contributions, including the value of any real property, equipment, goods, or services con...

1	Cash Grant from local government	Mar 28, 2012 10:21 AM
2	We now have our match met with shelter volunteer hours and donations for the two shelters we service. I would hope to continue this practice.	Mar 27, 2012 3:57 PM
3	employee salary to run program	Mar 22, 2012 9:40 AM
4	United Way funds. Local community cash donations.	Mar 21, 2012 9:41 AM
5	Foundations and Grants	Mar 21, 2012 8:37 AM
6	cash match	Mar 20, 2012 10:32 AM
7	NA	Mar 20, 2012 9:12 AM
8	Mostly with cash contributions from clients assisted.	Mar 19, 2012 1:00 PM
9	United Way; Local contributions	Mar 16, 2012 11:11 AM
10	donations of food and furniture state wages United Way funds	Mar 16, 2012 9:03 AM
11	Services contributed	Mar 15, 2012 3:05 PM
12	client match, clearinghouse connections (emergency program) match, state waiver for small agencies	Mar 15, 2012 1:25 PM

Q11. Based on your planned use of the new ESG funds (and considering your use of the HPRP funds):

How many families do you plan to serve?

1	5	Mar 28, 2012 10:21 AM
2	10-15 depending on household circumstances	Mar 27, 2012 3:57 PM
3	15 households	Mar 22, 2012 9:40 AM
4	@ 52	Mar 21, 2012 9:41 AM
5	250	Mar 21, 2012 8:37 AM
6	18 families per year	Mar 20, 2012 10:32 AM
7	na	Mar 20, 2012 9:12 AM
8	10	Mar 19, 2012 1:00 PM
9	200 unduplicated	Mar 16, 2012 11:11 AM
10	2-5	Mar 16, 2012 9:03 AM
11	35	Mar 15, 2012 3:05 PM
12	4	Mar 15, 2012 1:25 PM

How many individuals do you plan to serve?

1	5	Mar 28, 2012 10:21 AM
3	45	Mar 22, 2012 9:40 AM
4	210	Mar 21, 2012 9:41 AM
5	250	Mar 21, 2012 8:37 AM
6	55 or more	Mar 20, 2012 10:32 AM
7	na	Mar 20, 2012 9:12 AM
8	10	Mar 19, 2012 1:00 PM
9	500 unduplicated	Mar 16, 2012 11:11 AM
10	5-15	Mar 16, 2012 9:03 AM
11	105	Mar 15, 2012 3:05 PM
12	7	Mar 15, 2012 1:25 PM

What services will you offer?

1	Homeless Prevention, Rapid Rehousing, Case Management/Eligibility Tech.	Mar 28, 2012 10:21 AM
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Q11. Based on your planned use of the new ESG funds (and considering your use of the HPRP funds):

2	rent, utilities, deposits, hotel/motel vouchers	Mar 27, 2012 3:57 PM
3	homeless prevention and rehousing	Mar 22, 2012 9:40 AM
4	Rent/Deposit/Utility Deposits or Arrears	Mar 21, 2012 9:41 AM
5	housing stabilization, placement, case management and emergency rental assistance	Mar 21, 2012 8:37 AM
6	rapid rehousing through shelter, meals, case mgt. & rental assistance	Mar 20, 2012 10:32 AM
7	na	Mar 20, 2012 9:12 AM
8	Case Management and referrals will be a large part of the services we offer. We will try to network clients with other available resources to leverage the ESG funds as highly as possible.	Mar 19, 2012 1:00 PM
9	Single Point of Entry Services	Mar 16, 2012 11:11 AM
10	Employment and Training, child care resource and referral, LIEAP, Weatherization, drug and alcohol counseling, domestic and sexual abuse advocacy, Head Start, Early Head Start, Section 8, Quality Life Concepts, Job Corp - all in the same location	Mar 16, 2012 9:03 AM
12	see above	Mar 15, 2012 1:25 PM

Q12. Written standards for providing the proposed ESG assistance will be required. Under HPRP, some agencies used a State-developed manual, and some agencies established internal policies and procedures in addition to the State manual.

1	We intend to use state written procedures for uniformity and ease in audits.	Mar 28, 2012 10:21 AM
2	We will use the policies that were written for HPRP	Mar 22, 2012 9:40 AM
3	Housing for homelessness has changed. Time line varies. AMI varies.	Mar 21, 2012 9:41 AM
4	We developed Home To Stay policy and procedures that apply to all funding requirements and apply those to all Home To Stay funded customers	Mar 21, 2012 8:37 AM
5	If we receive funds, we will develop appropriate standards.	Mar 20, 2012 10:32 AM
6	We used the state standards as well as additional agency policies for HPRP. I would anticipate that our standards/policies for ESG will be very similar to the ones used for HPRP with appropriate changes for the differences in the programs. Having state standards as a starting guideline was very effective and helped all the HRDC's in the state have a common starting ground for the program.	Mar 19, 2012 1:00 PM
7	National Accrediting standards for 2-1-1 Telephone Information and Referral Services; state produced written standards.	Mar 16, 2012 11:11 AM
8	Too numerous to list. We will not screen out people who were deemed to be "high risk."	Mar 16, 2012 9:03 AM
9	Used the state standards and access the federal website.	Mar 15, 2012 3:05 PM
10	based on state and federal requirements, we wrote standards for the organization	Mar 15, 2012 1:25 PM

Q13. What are the performance indicators that you would suggest using to measure effectiveness?

1	Recipients still housed 3-6 months depending on circumstances	Mar 28, 2012 10:21 AM
2	ROMA 6.2	Mar 27, 2012 3:57 PM
3	Number of families helped with legitimate housing needs	Mar 22, 2012 9:40 AM
4	Send a letter of call 30 days after exit to check stability.	Mar 21, 2012 9:41 AM
5	Housing status at program exit and six months after services, unit of service cost, self sufficiency evaluation at exit	Mar 21, 2012 8:37 AM
6	# of days in shelter, employment secured & stable permanent housing at exit, at 6 mos. & at 12 months	Mar 20, 2012 10:32 AM
7	discharge to permanent housing and stability 6-12 mos later	Mar 20, 2012 9:12 AM
8	Length of housing stability will be the biggest performance indicator we will use. Additionally use of other resources to leverage ESG will be a performance indicator	Mar 19, 2012 1:00 PM
9	local agencies using Single Point of Entry, linkages, follow up	Mar 16, 2012 11:11 AM
10	Housing was stabilized for 120 days.	Mar 16, 2012 9:03 AM
11	30 day follow-ups	Mar 15, 2012 3:05 PM
12	being in a stable situation 6 months after the assistance	Mar 15, 2012 1:25 PM

Q14. What limits does your agency set on benefits?

What is the maximum amount of monthly assistance a household can receive?

1	\$800 - These limits will be reduced because of the reduction of funds.	Mar 28, 2012 10:21 AM
2	\$500.00	Mar 27, 2012 3:57 PM
3	1000	Mar 22, 2012 9:40 AM
4	Helped client as long as eligible/compliant.	Mar 21, 2012 9:41 AM
5	None	Mar 21, 2012 8:37 AM
6	\$500	Mar 20, 2012 10:32 AM
7	3	Mar 20, 2012 9:12 AM
8	For the current ESG program we use \$400, however for the new ESG program, I think it will be more like HPRP and will be dependent on the size of the unit, other family resources, etc. I don't think it would be greater than \$800 per month	Mar 19, 2012 1:00 PM
9	Not Applicable	Mar 16, 2012 11:11 AM
10	Our Agency does not set a limit, but due to limited funding we can assume that it would be reasonable that we would pay up to \$1,500.	Mar 16, 2012 9:03 AM
11	no current limit	Mar 15, 2012 3:05 PM
12	no limit beyond the state and federal requirements	Mar 15, 2012 1:25 PM

What is the maximum amount of total assistance a household can receive?

1	\$2400 Again, these will need to be reduced because of less funding	Mar 28, 2012 10:21 AM
2	\$3,000	Mar 27, 2012 3:57 PM
3	1000	Mar 22, 2012 9:40 AM
4	Helped Client as long as eligible/compliant.	Mar 21, 2012 9:41 AM
5	None	Mar 21, 2012 8:37 AM
6	\$500 if we don't receive ESG funds	Mar 20, 2012 10:32 AM
7	12	Mar 20, 2012 9:12 AM
8	Again, it all depends on circumstances of the individual. We did not have a hard and fast rule but we tried to keep it less than \$3,000 for HPRP	Mar 19, 2012 1:00 PM
9	N/A	Mar 16, 2012 11:11 AM
10	\$1,500	Mar 16, 2012 9:03 AM
11	no current limit	Mar 15, 2012 3:05 PM

Q14. What limits does your agency set on benefits?

12	same	Mar 15, 2012 1:25 PM
What is the maximum length of time a household can participate in HPRP assistance?		
1	Our previous program allowed 9 months. These will be changed according to state policies which we will now be following	Mar 28, 2012 10:21 AM
2	12 months	Mar 27, 2012 3:57 PM
3	undetermined	Mar 22, 2012 9:40 AM
4	18 months	Mar 21, 2012 9:41 AM
5	3 months	Mar 21, 2012 8:37 AM
6	90 days shelter + follow-up case mgt. as long as needed	Mar 20, 2012 10:32 AM
7	12	Mar 20, 2012 9:12 AM
8	Our general rule was 3 months, however with a supervisor approval, it could go up to 6 months.	Mar 19, 2012 1:00 PM
9	N/A	Mar 16, 2012 11:11 AM
10	3 months	Mar 16, 2012 9:03 AM
11	one time assistance	Mar 15, 2012 3:05 PM
12	same	Mar 15, 2012 1:25 PM
What is the maximum number of times participants may receive assistance?		
1	Once	Mar 28, 2012 10:21 AM
2	up to 12	Mar 27, 2012 3:57 PM
3	undetermined	Mar 22, 2012 9:40 AM
4	Varies according to circumstances.	Mar 21, 2012 9:41 AM
5	determined on a case by case basis	Mar 21, 2012 8:37 AM
6	1X shelter stay; unlimited follow-up as requested	Mar 20, 2012 10:32 AM
7	1	Mar 20, 2012 9:12 AM
8	No hard and fast rule but for more than 2 incidents of assistance, a supervisor would have to approve it.	Mar 19, 2012 1:00 PM
9	N/A	Mar 16, 2012 11:11 AM
10	3 times	Mar 16, 2012 9:03 AM
11	would want to limit one time per six months or year	Mar 15, 2012 3:05 PM

Q14. What limits does your agency set on benefits?

12 same

Mar 15, 2012 1:25 PM

Q15. What do you consider the most effective practices of the HPRP program as you enacted it in your community?

1	Deposits for people with Section 8 Vouchers, VASH, Shelter + Care or other subsidized housing	Mar 28, 2012 10:21 AM
2	referral and case management to other programs	Mar 22, 2012 9:40 AM
3	Short term rental assistance provided greater long term sustainability and support to households experiencing a housing crisis, our data showed that 1.9 units of assistance were required to stabilize a household	Mar 21, 2012 8:37 AM
4	prevention and rental assistance	Mar 20, 2012 10:32 AM
5	fast response	Mar 20, 2012 9:12 AM
6	Partnerships, leveraging resources, prevention of homelessness was a priority. It was much easier to prevent homelessness than to get families/individuals out of homelessness.	Mar 19, 2012 1:00 PM
7	effective screening & assessment to ensure sustainable housing	Mar 16, 2012 11:11 AM
8	Prevention of homelessness - paying rental arrears - paying deposits	Mar 16, 2012 9:03 AM
9	housing counseling/budgeting	Mar 15, 2012 3:05 PM
10	rental assistance/homeless prevention	Mar 15, 2012 1:25 PM

Q16. What kind of outcomes have you observed among the people who were helped with HPRP?

Were people able to sustain their housing beyond the limit of the HPRP assistance?

1	Tracked 3 months after end of assistance	Mar 28, 2012 10:21 AM
2	Some households were trying to catch up back rent after being unemployed, so HPRP enabled them to stay in their homes once they were caught up. Other participants were able to get into housing and were able to maintain.	Mar 27, 2012 3:57 PM
3	yes	Mar 22, 2012 9:40 AM
4	Yes, but not all.	Mar 21, 2012 9:41 AM
5	yes	Mar 21, 2012 8:37 AM
6	I don't know as HRDC conducted programs	Mar 20, 2012 10:32 AM
7	yes, but more anecdotal than documented	Mar 20, 2012 9:12 AM
8	Some were and some weren't. It all depended on the family/individual's circumstances and their ability to find and/or keep a job, willingness of the landlord to work with them and sometimes, just plain luck	Mar 19, 2012 1:00 PM
9	yes	Mar 16, 2012 11:11 AM
10	approximately 75% in our observation	Mar 16, 2012 9:03 AM
11	yes	Mar 15, 2012 3:05 PM
12	yes	Mar 15, 2012 1:25 PM

What percentage of people were able to sustain their housing after assistance ended?

1	75%	Mar 28, 2012 10:21 AM
2	12% were placed on the Section 8 program	Mar 27, 2012 3:57 PM
3	unknown	Mar 22, 2012 9:40 AM
4	About 75%.	Mar 21, 2012 9:41 AM
5	73%	Mar 21, 2012 8:37 AM
6	same answer as above	Mar 20, 2012 10:32 AM
7	50-60%	Mar 20, 2012 9:12 AM
8	This is hard to determine as we weren't able to stay in contact with all the clients we worked with. However our estimate would be 50-60%.	Mar 19, 2012 1:00 PM
9	80 percent	Mar 16, 2012 11:11 AM
10	approximately 75% in our observation	Mar 16, 2012 9:03 AM
12	75%	Mar 15, 2012 1:25 PM

Q16. What kind of outcomes have you observed among the people who were helped with HPRP?

What kind of follow-up practices did you employ after people transitioned from the program?

1	Throse recieving 3 to 6 months of rental assistance met with the case manager each month before the payment was made. Letters were sent out to participants 3 months after assistance was finished asking them to contact the case manager. Some did call. If the letter was not returned by the post office, the assumption was made that they were still at that address	Mar 28, 2012 10:21 AM
3	nothing official but able to track through other agency programs unofficially	Mar 22, 2012 9:40 AM
4	Final letter.	Mar 21, 2012 9:41 AM
5	additional case management services and self-sufficiency evaluation at exit and follow up survey and questionnaire	Mar 21, 2012 8:37 AM
6	Family Promise does case mgt.	Mar 20, 2012 10:32 AM
7	various, including survey, othr program, mentor contacts	Mar 20, 2012 9:12 AM
8	We contacted them by survey and/or phone at three months after they left the program. Some actually called us to let us know how they were doing.	Mar 19, 2012 1:00 PM
9	contacted landlords 3 months after assistance ended	Mar 16, 2012 11:11 AM
10	one contact in the following year	Mar 16, 2012 9:03 AM
11	phone contact	Mar 15, 2012 3:05 PM
12	no follow up requests for assistance; letters	Mar 15, 2012 1:25 PM

What else would you like to tell us?

1	The survey leaves out one of the most important part of the program. An eligibility Technician/Case Manager is essential for any program of this type. Who will fill out the forms and help gather needed information? Just providing short term rental assistance or rental arrears does not address the issues causing homelessness. Only one family that we severed during HPRP were in a position where the husband lost his job, they were able to pay their rent with his unemployment. When the unemployment ran out, they were one month behind in their rent which we helped them with that month. The next month he had for another job and they no longer needed assistance. Most of the people who applied for assistance were 3-6 months behing in their rent and had very limited incomes, sometimes only food stamps. With out case management to help them with job search, public housing applications, the referrals to drug, mental health and other health services, the clients were right back where they started when HPRP assistance ran out.	Mar 28, 2012 10:21 AM
3	We could really use more money	Mar 22, 2012 9:40 AM
4	If regulations were simplified and forms standardized, we could assist more people.	Mar 21, 2012 9:41 AM
6	Family Promise does rapid rehousing - we would like direct access to these funds as HRDC keeps cutting any funds we receive from them.	Mar 20, 2012 10:32 AM

Q16. What kind of outcomes have you observed among the people who were helped with HPRP?

8	There is no tried and true method to determine if the individual/family you are helping will be successful. The most important thing is the "gumption of the ones you are working with" and a little bit of good luck goes a long way.	Mar 19, 2012 1:00 PM
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Q17. What accomplishments can you project will be made during the grant period?

...in terms of Homelessness Prevention?

1	People remained housed for a few months or longer	Mar 28, 2012 10:21 AM
2	help 15 families	Mar 22, 2012 9:40 AM
3	Majority of clients will be stably housed.	Mar 21, 2012 9:41 AM
4	for households that receive financial assistance, 73% stably housed at program exit (prevention 70% of overall customers)	Mar 21, 2012 8:37 AM
5	unknown - HRDC	Mar 20, 2012 10:32 AM
6	Keep people from being evicted from their housing. Give them a short period of assistance to get back on track again.	Mar 19, 2012 1:00 PM
7	access to information on resources; linkages	Mar 16, 2012 11:11 AM
8	we will assist 2 - 5 families	Mar 16, 2012 9:03 AM
9	housing stability and connection to services	Mar 15, 2012 3:05 PM
10	some families will be stabilized	Mar 15, 2012 1:25 PM

...in terms of Rapid Rehousing?

1	Homeless individuals and families can be immediately housed, but there is uncertainty as to how long they will maintain housing	Mar 28, 2012 10:21 AM
2	help 15 families	Mar 22, 2012 9:40 AM
3	Majority of clients will be stably housed.	Mar 21, 2012 9:41 AM
4	73% of households who receive financial assistance will be stably housed at program exit	Mar 21, 2012 8:37 AM
5	unknown - HRDC	Mar 20, 2012 10:32 AM
6	Help those who are homeless find a place to live and have some housing stability.	Mar 19, 2012 1:00 PM
7	access to information on resources; linkages	Mar 16, 2012 11:11 AM
8	we will assist 2 - 5 families	Mar 16, 2012 9:03 AM
9	housing stability and connection to services	Mar 15, 2012 3:05 PM
10	homeless families will gain permanent housing to become stabilized	Mar 15, 2012 1:25 PM

...in terms of relocation or stabilization?

1	none	Mar 28, 2012 10:21 AM
2	I do not understand your definitions....please advise	Mar 22, 2012 9:40 AM

Q17. What accomplishments can you project will be made during the grant period?

3	N/A	Mar 21, 2012 9:41 AM
4	73% of households who receive financial assistance will be stabilized at program exit	Mar 21, 2012 8:37 AM
5	unknown - HRDC	Mar 20, 2012 10:32 AM
6	???	Mar 19, 2012 1:00 PM
7	access to information on resources; linkages	Mar 16, 2012 11:11 AM
8	we will assist 2 - 5 families	Mar 16, 2012 9:03 AM
9	housing stability and connection to services	Mar 15, 2012 3:05 PM
10	case management will assist families in problem-solving for the future	Mar 15, 2012 1:25 PM

Q18. What kind of obstacles do you foresee in implementing the new ESG activities?

1	Lack of substantial funding. Lack of subsidized housing for people with very low incomes. No case management.	Mar 28, 2012 10:21 AM
2	Housing units are in high demand with high rents due to oil activity in the area. Households with lower income are going to find it hard to find new housing in their price range, or stay in a unit if a landlord raises the rent.	Mar 27, 2012 3:57 PM
3	not enough funds. agency will need to find a way to administer the small amount of funds	Mar 22, 2012 9:40 AM
4	1. Rent reasonableness in outlying areas are had to get. 2. Rents are higher. 3. Fewer rentals at affordable price. 4. 30% AMI will leave many desperate people without help. 5. Clients may become dependent on system.	Mar 21, 2012 9:41 AM
5	case management is the most effective tool that we have in assisting customers, however there is no funding available for case management	Mar 21, 2012 8:37 AM
6	The biggest obstacle for Family Promise is getting access to any of these funds.	Mar 20, 2012 10:32 AM
7	huge admin burden for very little money. Cost effectiveness in question	Mar 20, 2012 9:12 AM
8	Not near enough funding to do what we are being asked to do. Lots of rules and regulations for a very small pot of money.	Mar 19, 2012 1:00 PM
9	lack of funding - particularly administration funds In the community, we will build expectations and very few people will actually be helped. People will be angry and disappointed.	Mar 16, 2012 9:03 AM
10	HMIS training	Mar 15, 2012 3:05 PM
11	low funding	Mar 15, 2012 1:25 PM

Q19. As the new ESG rolls out, what recommendations or suggestions do you have to ensure that it is as successful as possible?

1	The new ESG program with the exception of the \$'s going to shelters and transitional housing for the homeless is a very small band-aid. The minimal amount of money will only help those people who do not have a long history of homelessness. It will not jhelp the unemployed or the under employed unless there is an increase in subsidized housing of all kinds.	Mar 28, 2012 10:21 AM
2	We will clarify in intervies	Mar 22, 2012 9:40 AM
3	Make clients complete budgeting classes. Clients should sонтinue to fill out job search forms and be actually looking for work.	Mar 21, 2012 9:41 AM
4	state policy and procedures available before contract start date	Mar 21, 2012 8:37 AM
5	Allow small non-profit agencies to get funds directly.	Mar 20, 2012 10:32 AM
6	WE already know how to run the HPRP program and have our policies, etc in place. Have the new ESG program be closely aligned with HPRP to make the transition as smooth as possible. Ask HUD to be a partner with us rather assuming that their money will not be spent wisely. A little wiggle room for each agency to have discretion on the best ways to spend the money would be nice.	Mar 19, 2012 1:00 PM
7	All the guidelines for the program should be established at the beginning of the program. Any rule changes made during the year, all previous files should get a waiver.	Mar 16, 2012 9:03 AM
8	continued clear communication for state, completed state progrma manual, adequate HMIS training	Mar 15, 2012 3:05 PM
9	clear communication	Mar 15, 2012 1:25 PM

Q20. Thank you for participating in this Survey. Your answers will be used to create the Substantial Amendment to the Consolidated Plan, so that Montana will be eligible to receive these funds. Rachel Gooen or Sherri Downing will be in touch within a few working days to request a follow-up interview. ...

1

Name:	Theresa McCarthy	Mar 28, 2012 10:21 AM
Agency:	HRC, District XII	Mar 28, 2012 10:21 AM
Address:	304 N. Main	Mar 28, 2012 10:21 AM
City/Town:	Butte	Mar 28, 2012 10:21 AM
State:	MT	Mar 28, 2012 10:21 AM
ZIP:	59701	Mar 28, 2012 10:21 AM
Email Address:	tmccarthy@montana.com	Mar 28, 2012 10:21 AM
Phone Number:	406-782-8250	Mar 28, 2012 10:21 AM

2

Name:	Connie Smith	Mar 27, 2012 3:57 PM
Agency:	Action for Eastern Montana	Mar 27, 2012 3:57 PM
Address:	PO Box 1309	Mar 27, 2012 3:57 PM
City/Town:	Glendive	Mar 27, 2012 3:57 PM
State:	MT	Mar 27, 2012 3:57 PM
ZIP:	59330	Mar 27, 2012 3:57 PM
Email Address:	c.smith@aemt.org	Mar 27, 2012 3:57 PM
Phone Number:	406-377-3564	Mar 27, 2012 3:57 PM

3

Name:	Wendy Plymale	Mar 22, 2012 9:40 AM
Agency:	RMDC	Mar 22, 2012 9:40 AM
Address:	200 S Cruse	Mar 22, 2012 9:40 AM
City/Town:	Helena	Mar 22, 2012 9:40 AM
State:	MT	Mar 22, 2012 9:40 AM
ZIP:	59601	Mar 22, 2012 9:40 AM
Email Address:	wplymale@rmdc.net	Mar 22, 2012 9:40 AM

Q20. Thank you for participating in this Survey. Your answers will be used to create the Substantial Amendment to the Consolidated Plan, so that Montana will be eligible to receive these funds. Rachel Gooen or Sherri Downing will be in touch within a few working days to request a follow-up interview. ...

Phone Number:	406-457-7336	Mar 22, 2012 9:40 AM
4		
Name:	Kim Reynolds	Mar 21, 2012 9:41 AM
Agency:	Opportunities, Inc.	Mar 21, 2012 9:41 AM
Address:	PO Box 2289	Mar 21, 2012 9:41 AM
City/Town:	Great Falls	Mar 21, 2012 9:41 AM
State:	MT	Mar 21, 2012 9:41 AM
ZIP:	59403	Mar 21, 2012 9:41 AM
Email Address:	kimr@gfoppinc.org	Mar 21, 2012 9:41 AM
Phone Number:	406-216-2300	Mar 21, 2012 9:41 AM
5		
Name:	Sara Anderson	Mar 21, 2012 8:37 AM
Agency:	Human Resource Development Council, IX	Mar 21, 2012 8:37 AM
Address:	32 South Tracy	Mar 21, 2012 8:37 AM
City/Town:	Bozeman	Mar 21, 2012 8:37 AM
State:	MT	Mar 21, 2012 8:37 AM
ZIP:	59715	Mar 21, 2012 8:37 AM
Email Address:	sanderson@hrdc9.org	Mar 21, 2012 8:37 AM
Phone Number:	(406) 585-4884	Mar 21, 2012 8:37 AM
6		
Name:	Gloria Edwards	Mar 20, 2012 10:32 AM
Agency:	Family Promise of Gallatin Valley	Mar 20, 2012 10:32 AM
Address:	PO Box 475	Mar 20, 2012 10:32 AM
City/Town:	Bozeman	Mar 20, 2012 10:32 AM
State:	MT	Mar 20, 2012 10:32 AM
ZIP:	59771-0475	Mar 20, 2012 10:32 AM

Q20. Thank you for participating in this Survey. Your answers will be used to create the Substantial Amendment to the Consolidated Plan, so that Montana will be eligible to receive these funds. Rachel Gooen or Sherri Downing will be in touch within a few working days to request a follow-up interview. ...

Email Address:	gedwards@familypromisev.org	Mar 20, 2012 10:32 AM
Phone Number:	406-582-7388	Mar 20, 2012 10:32 AM
7		
Name:	Bob Buzzas	Mar 20, 2012 9:12 AM
Agency:	MT CoC	Mar 20, 2012 9:12 AM
Address:	321 E. Main	Mar 20, 2012 9:12 AM
City/Town:	Bozeman	Mar 20, 2012 9:12 AM
State:	MT	Mar 20, 2012 9:12 AM
ZIP:	59715	Mar 20, 2012 9:12 AM
Email Address:	civicconsulting@msn.com	Mar 20, 2012 9:12 AM
Phone Number:	406-586-1572	Mar 20, 2012 9:12 AM
8		
Name:	Jane Nolan	Mar 19, 2012 1:00 PM
Agency:	Community Action Partnership of NW MT	Mar 19, 2012 1:00 PM
Address:	214 Main Street	Mar 19, 2012 1:00 PM
City/Town:	Kalispell	Mar 19, 2012 1:00 PM
State:	MT	Mar 19, 2012 1:00 PM
ZIP:	59901	Mar 19, 2012 1:00 PM
Email Address:	janen@kalhrdc.mt.gov	Mar 19, 2012 1:00 PM
Phone Number:	406-758-5452 or 406-849-5887 (I work at home a lot)	Mar 19, 2012 1:00 PM
9		
Name:	Jim Morton	Mar 16, 2012 11:11 AM
Agency:	District XI Human Resource Council	Mar 16, 2012 11:11 AM
Address:	1801 South Higgins Avenue	Mar 16, 2012 11:11 AM
City/Town:	Missoula	Mar 16, 2012 11:11 AM
State:	MT	Mar 16, 2012 11:11 AM

Q20. Thank you for participating in this Survey. Your answers will be used to create the Substantial Amendment to the Consolidated Plan, so that Montana will be eligible to receive these funds. Rachel Gooen or Sherri Downing will be in touch within a few working days to request a follow-up interview. ...

ZIP:	59801	Mar 16, 2012 11:11 AM
Email Address:	jpm@hrcxi.org	Mar 16, 2012 11:11 AM
Phone Number:	406.728.3710	Mar 16, 2012 11:11 AM
10		
Name:	Karen Thomas	Mar 16, 2012 9:03 AM
Agency:	District 4 Human Resources Development Council	Mar 16, 2012 9:03 AM
Address:	2229 5th Avenue	Mar 16, 2012 9:03 AM
City/Town:	Havre	Mar 16, 2012 9:03 AM
State:	MT	Mar 16, 2012 9:03 AM
ZIP:	59501	Mar 16, 2012 9:03 AM
Email Address:	thomask@hrdc4.org	Mar 16, 2012 9:03 AM
Phone Number:	406-265-6743	Mar 16, 2012 9:03 AM
11		
Name:	Denise Jordan	Mar 15, 2012 3:05 PM
Agency:	District 7 HRDC	Mar 15, 2012 3:05 PM
Address:	7 North 31st St	Mar 15, 2012 3:05 PM
City/Town:	Billings	Mar 15, 2012 3:05 PM
State:	MT	Mar 15, 2012 3:05 PM
ZIP:	59102	Mar 15, 2012 3:05 PM
Email Address:	djordan@hrdc7.org	Mar 15, 2012 3:05 PM
Phone Number:	406-247-4706	Mar 15, 2012 3:05 PM
12		
Name:	Vanessa Adams	Mar 15, 2012 1:25 PM
Agency:	District 6 HRDC	Mar 15, 2012 1:25 PM
Address:	300 1st Ave. suite 203	Mar 15, 2012 1:25 PM
City/Town:	Lewistown	Mar 15, 2012 1:25 PM

Q20. Thank you for participating in this Survey. Your answers will be used to create the Substantial Amendment to the Consolidated Plan, so that Montana will be eligible to receive these funds. Rachel Goen or Sherri Downing will be in touch within a few working days to request a follow-up interview. ...

State:	MT	Mar 15, 2012 1:25 PM
ZIP:	59457	Mar 15, 2012 1:25 PM
Email Address:	vadams@hrdc6.org	Mar 15, 2012 1:25 PM
Phone Number:	406-535-7488	Mar 15, 2012 1:25 PM



HOMELESS PREVENTION AND RAPID RE-HOUSING

Policy Manual

“This project/activity is funded as a whole or in part with monies received through the “American Recovery and Reinvestment Act of 2009”. This project/activity is intended to further the recovery of the economy through the retention of/or increase in jobs for Montanans and through supplemental funding of human services programs to meet the needs of Montanans who due to the economic contraction are in need of the aid of society.”

<p>Department of Public Health and Human Services</p> <p>HOMELESS PREVENTION AND RAPID RE-HOUSING</p>	<p>SECTION:</p> <p>Table of Contents</p>
	<p>SUBJECT:</p> <p>Sections and Subjects</p>

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		HPRP 1-0
Department of Public Health and Human Services HOMELESS PREVENTION AND RAPID RE-HOUSING	SECTION: Purpose and Scope	
	SUBJECT: Overview	

The purpose of the Homelessness Prevention and Rapid Re-Housing Program (HPRP) is to provide homelessness prevention assistance to households who would otherwise become homeless—many due to the economic crisis—and to provide assistance to rapidly re-house persons who are homeless. The U.S. Department of Housing and Urban Development (HUD) expects that HPRP resources will be targeted and prioritized to serve households that are most in need of this temporary assistance and are most likely to achieve stable housing; whether subsidized or unsubsidized, outside of HPRP after the program concludes.

Agencies must comply with applicable laws and guidance including the requirements of:

- A. Housing and Urban Development (HUD) [Docket Number FR-5307-N-01];
- B. Section 103 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11302);
- C. 24 CFR Part 91;
- D. Circulars A-110 and A-122 or OMB Circulars A-87 and A-102 (for units of local government);
- E. Single Audit Act Amendments of 1996 (OMB Circular A-133)
- F. HUD Eligibility Determination and Documentation Guidance

The documents above and addition resources can be accessed at the following sites:

- <http://www.hudhre.info/HPRP/index.cfm?do=viewHPRPIssuances> HUD-Issued Guidance
- <http://www.hudhre.info/HPRP/index.cfm?do=viewHPRPData> Data Collection/ Reporting
- <http://www.hudhre.info/HPRP/index.cfm?do=viewHPRPTools> Tools and TA Resources
- <http://www.hudhre.info/HPRP/index.cfm?do=viewHPRPFaqHelp> FAQ's and Help Desk
- <http://sites.google.com/site/mthprp/home> Montana HPRP site

The term the Homeless Prevention Rapid Re-Housing contract is from July 14, 2009 through July 13, 2011. The HPRP contract cannot be extended.

<p style="text-align: center;">Department of Public Health and Human Services</p> <p style="text-align: center;">HOMELESS PREVENTION AND RAPID RE-HOUSING</p>	<p style="text-align: center;">SECTION: Eligibility Requirements</p> <hr/> <p style="text-align: center;">SUBJECT: Minimum Criteria</p>
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The HPRP client files must contain documentation of an “Eligibility Assessment” to determine the eligibility of assistance to be provided.

Minimum Criteria set forth by HUD to determine eligibility for HPRP:

1. **Client Intake, Assessment and Case Management:** The household must receive at least an initial consultation and eligibility assessment with a case manager or other authorized representative who can determine eligibility and the appropriate type of assistance needed;
2. **Income:** Gross Annual Income must be at or below 50% AMI for county of residence. The 50% Area Median Income (AMI) guidelines can be accessed at <http://www.huduser.org/DATASETS/il.html>. Annual income includes the total current gross income of all adult household members;
3. **Housing Status:** The household must be either Homeless (rapid re-housing assistance), or at risk of losing their housing (homeless prevention assistance);

AND must meet the following circumstances:

- a. No appropriate subsequent housing options have been identified;
- b. Household lacks the financial resources to obtain immediate housing or remain in the existing housing; and
- c. Household lacks support networks needed to obtain immediate housing or remain in the existing housing.

In addition to assessing and documenting income and the current housing situation of applicant households, agencies must also document that the household would become homeless **but for** the HPRP assistance. Without HPRP assistance a household would require emergency shelter or would otherwise become literally homeless.

NOTE: If one or more of the minimum criteria cannot be met by the household, the individual will not be eligible for HPRP financial assistance or services. Refer the household to other services or programs.

<p style="text-align: center;">Department of Public Health and Human Services</p> <p style="text-align: center;">HOMELESS PREVENTION AND RAPID RE-HOUSING</p>	<p style="text-align: center;">SECTION: Eligibility Requirements</p>
	<p style="text-align: center;">SUBJECT: Local Determinants (Targeting)</p>

Agencies may consider other risk factors or other ways to target persons at risk of homelessness when developing local programs. Risk factors that the agencies can use to target households at a higher risk of becoming homeless are:

- Eviction within 2 weeks from a private dwelling (including housing provided by family or friends);
- Discharge within 2 weeks from an institution in which the person has been a resident for more than 180 days (including prisons, mental health institutions, hospitals);
- Residency in housing that has been condemned by housing officials and is no longer meant for human habitation;
- Sudden and significant loss of income;
- Sudden and significant increase in utility costs;
- Mental health and substance abuse issues;
- Physical disabilities and other chronic health issues, including HIV/AIDS;
- Severe housing cost burden (greater than 50 percent of income for housing costs);
- Homeless in last 12 months;
- Young head of household (under 25 with children or pregnant);
- Current or past involvement with child welfare, including foster care;
- Pending foreclosure of rental housing;
- Extremely low income (less than 30 percent of Area Median Income);
- High overcrowding (the number of persons exceeds health and/or safety standards for the housing unit size);
- Past institutional care (prison, treatment facility, hospital);
- Recent traumatic life event, such as death of a spouse or primary care provider, or recent health crisis that prevented the household from meeting its financial responsibilities;
- Credit problems that preclude obtaining of housing; or
- Significant amount of medical debt.

NOTE: Agencies choosing to use additional risk factors or local determinants must develop policies to ensure they are applying these factors consistently.

<p style="text-align: center;">Department of Public Health and Human Services</p> <p style="text-align: center;">HOMELESS PREVENTION AND RAPID RE-HOUSING</p>	<p style="text-align: center;">SECTION: Eligibility Requirements</p> <hr/> <p style="text-align: center;">SUBJECT: Client Intake, Assessment and Case Management</p>
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Client Intake, Assessment and Case Management:

Agencies are expected to include documentation on the results of the eligibility assessment in the case file. Obtaining or maintaining stable housing is a likely primary goal and other steps needed to achieve housing stability (such as employment or needed supports) are likely related goals. Plans must be developed with full involvement from household members, and should start with a strengths assessment. Case managers should build plans around the client's own goals. Service needs may include: mental health, substance abuse, domestic violence, education, employment, and health care.

In addition to assessing and documenting income and the current housing situation of applicant households, the agencies must also assess and document that the household would become homeless **but for** the HPRP assistance. This includes assessing and documenting a household's support networks and financial resources and other housing options.

Note: An eviction notice and proof of income alone are not enough to determine eligibility and appropriateness for HPRP.

Example templates for determining and documenting income and housing status eligibility are available at www.hudhre.info. (Look under "Find Resources by Topic" on the right side of the page) The example templates are also included under the forms section of this document.

Recertification of Eligibility:

Agencies must evaluate and re-certify the eligibility of HPRP program participants at least once every 3 months. Agencies should determine the re-certification date based on the original eligibility assessment date. The intent is to assure the household remains eligible and needs continued assistance to prevent homelessness, particularly since eligibility is based on current income as opposed to past or projected income.

The calculation of current income at the time of the three month eligibility recertification is also based on the total gross income the household is receiving.

Staff Certification of Eligibility for HPRP Assistance:

The "Staff Certification of Eligibility for HPRP Assistance" form (formally "Staff Affidavit") **must** be completed and signed by the person determining eligibility and his/her supervisor for all households determined eligible. A new Staff Certification form is only required if a different staff person re-certifies eligibility at a later date. See the forms section of this

document or the following websites:

http://www.hudhre.info/documents/HPRP_StaffCertification.pdf and

<http://sites.google.com/site/mthprp/home/administrative>.

The “Staff Affidavit” form must be in every case file determined eligible or recertified on or after November 1, 2009.

The “Staff Certification of Eligibility for HPRP Assistance” form must in every case file determined eligible or recertified on or after May 1, 2010.

<p style="text-align: center;">Department of Public Health and Human Services</p> <p style="text-align: center;">HOMELESS PREVENTION AND RAPID RE-HOUSING</p>	<p style="text-align: center;">SECTION: Eligibility Requirements</p> <hr/> <p style="text-align: center;">SUBJECT: Income Eligibility</p>
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Income must be calculated at the time of application and every three (3) months thereafter. Income calculations must be documented in the client file.

This section provides detailed information on how to determine the Area Median Income (AMI) and how to calculate household income. Documentation of a household's total annualized gross income relative to Area Median Income and indicating the actual income guidelines for the area (50% of AMI or less) must be documented in the participant file.

Determining Area Median Income:

A household must have a gross annual income that is at or below 50% of the AMI. AMI is determined according to the state and local jurisdiction in which a household resides or enters the program, and is dependent on the number of household members. The AMI for each community can be found at <http://www.huduser.org/DATASETS/il.html>. The agencies should be sure to use the most recent data posted.

Income:

Income is any money that goes to, or on behalf of, the head of household or spouse (even if temporarily absent) or to any other household member. Annual income includes the current (within 30 days) gross income of all adult household members (18 years of age or older) and income attributable to a minor (S.S.I., child support, etc.)

The following types of income must be counted (inclusions) when calculating gross income for the household:

- Earned Income
- Self Employment/Business Income
- Interest & Dividend Income
- Pension/Retirement Income (VA, SS, and from a former job)
- Unemployment
- Disability Income (SSI, SSDI, private disability insurance and VA disability)
- TANF/Public Assistance/General Assistance
- Alimony, Child Support and Foster Care Income
- Armed Forces Income
- All income from full-time students when the head of household or spouse
- Income from full-time students up to \$480 annually when not head of household or spouse
- Adoption Assistance Payments up to \$480 annually

- Worker's Compensation

The follow types of income are NOT counted (exclusions) when calculating gross income for HPRP eligibility purposes:

- Income from employment of children, including foster children (Under 18)
- Inheritance and Insurance Income
- Medical Expense Reimbursements
- Income of Live-in Aides
- Disabled Persons
- Student Financial Aid
- Armed Forces Hostile Fire Pay
- Self-Sufficiency Program Income –Funds set aside for use under a PASS program
- Other Income (i.e., temporary, non-recurring or sporadic income)(Gifts)
- Reparations paid by a foreign government
- Income from full-time students- Annual earnings in excess of \$480 for each full-time student (18 or older)(Excluding the head of household or spouse)
- Adoption Assistance Payments- In excess of \$480 annually
- Deferred and Lump Sum Social Security & SSI payments
- Income Tax and Property Tax refunds
- Home Care Assistance
- Other Federal Exclusions- 24 CFR 5.609(c) apply (i.e. food stamps, VISTA, LIEAP, WIA, WIC, Childcare,)

A detailed list of these inclusions and exclusions can be found in Appendix A of the HPRP Eligibility Determination and Documentation Guidance document.

NOTE: Household assets are generally not counted as income, with the exception of interest and dividend income as indicated above.

Income Calculation:

Depending on pay periods used by the employer or the schedule of periodic payments, the following calculations convert the average wage into annual income:

- Hourly Wage multiplied by Hours Worked Per Week multiplied by 52 weeks
- Weekly Wage multiplied by 52 weeks
- Bi-Weekly (every other week) Wage multiplied by 26 bi-weekly periods
- Semi-Monthly Wage (twice a month) multiplied by 24 semi-monthly periods
- Monthly Wage multiplied by 12 months

Income Documentation:

HUD allows for various types of documentation, ranging from third part verification to applicant self declaration. General documentation standards, in order of preference, are as follows:

1. **Written Third Party**—Verification in writing from a third party (e.g. individual employer, Social Security Administration, welfare office) is preferred. Written third party documentation may include completion of a standardized form, such as a verification of income statement. See “HPRP Verification of Income” template at www.HUDHRE.info for examples. The “HPRP Verification of Income” form is also included under the Forms Section of this document.
2. **Oral Third Party**—Verification from a third party (e.g. individual employer, Social Security Administration, welfare office, etc.) provided by the third party over the telephone or in-person directly to HPRP staff. Oral third party verification is acceptable only if written third party verification cannot be obtained. HPRP staff must document reasons why third party written verification could not be obtained in the HPRP case file. The agency may use the ‘Verification of Income’ form to document oral third party income verification.
3. **Applicant Self-Declaration**—an affidavit of income status as reported by the household is allowable, but is only acceptable if written or verbal third party verification cannot be obtained. HPRP staff must document reasons why third party written or oral verification could not be obtained in the HPRP case file. See “HPRP Self-Declaration of Income” template at www.HUDHRE.info for examples. The “HPRP Self-Declaration of Income” template is also included under the forms section of this document. At a minimum, self-declaration documentation must include, source, amount, frequency, applicant’s signature, and date.

Note: HPRP staff must clearly and briefly describe in case file anytime written third party documentation is not used. This may be done as part of the documented client assessment or as part of other case file documentation (e.g., in case notes, on the income verification form).

Timeliness of Documentation

Documentation that is dated within 30 days prior to the time of application is acceptable for purposes of HPRP. However, a statement received any time within the twelve months prior to the time of application and reflecting current benefits received by an applicant household is allowed.

		HPRP 2-4
Department of Public Health and Human Services	SECTION: Eligibility Requirements	
HOMELESS PREVENTION AND RAPID RE-HOUSING	SUBJECT: Housing Status Eligibility	

The household’s housing status must be determined at the time of application and every three (3) months thereafter **in the case file**.

Housing status is only changed in the HMIS system upon entry and exit of the HPRP program. When assisted with HPRP, households maintain the housing status (homeless or at-risk) determined 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.

Rapid Re-Housing (Homeless Assistance) Eligibility

The purpose of HPRP rapid re-housing is to assist eligible program participants to quickly obtain stable housing. Households who meet one of the following criteria, along with the minimum eligibility requirements, are eligible under the Rapid Re-housing category of HPRP

1. Sleeping in an emergency shelter;
2. Sleeping in a place not meant for human habitation, such as cars, parks, abandoned buildings, streets/sidewalks;
3. Staying in a hospital or other institution for up to 180 days but was sleeping in an emergency shelter or other place not meant for human habitation (cars, parks, streets, etc.) immediately prior to entry into the hospital or institution;
4. Graduating from, or **timing out (not moving into)** of a transitional housing program for homeless persons only (i.e. persons who came from an emergency shelter or a place not meant for human habitation prior to program entry); and
5. Victim of domestic violence.

Homeless Prevention Eligibility (See Section 2-1 of this document for homelessness “Risk Factors”)

Agencies must assess and document that the household would become homeless (per the definition above) ***but for*** the HPRP assistance. In other words, a household would require emergency shelter or would otherwise become literally homeless in the absence of HPRP assistance. A household that is at-risk of losing their present housing may be eligible if it can be documented that:

- No appropriate subsequent housing options have been identified;

- The household lacks the financial resources to obtain immediate housing or remain in its existing housing; and
- The household lacks support networks needed to obtain immediate housing or remain in its existing housing.

For purposes of HPRP, HUD allows various types of documentation, ranging from third party verification to applicant self declaration. Minimum acceptable types of documentation vary depending on the particular housing status and circumstance being documented. General documentation standards, *in order of preference*, are as follows:

1. **Written Third Party**—Verification in writing from a third party (e.g. emergency shelter provider, landlord, etc.) either directly to HPRP staff or via the applicant is most preferred. Written third party documentation may include completion of a standardized form, such as “HPRP Homeless Certification” template. See “HPRP Homeless Certification” templates at www.HUDHRE.info for examples. A copy of the “HPRP Homeless Certification” form is under the forms section of this document.
2. **Oral Third Party**—Verification from a third party provided by the third party over the telephone or in-person directly to HPRP staff. Oral third party verification is acceptable only if written third party verification cannot be obtained. HPRP staff must document reasons why third party written verification could not be obtained in the HPRP participant file. See “HPRP Homeless Certification” templates at www.HUDHRE.info for examples. A copy of the “HPRP Homeless Certification” form is under the forms section of this document.
3. **Applicant Self-Declaration**—An affidavit of housing status as reported by the household is allowable, but is only acceptable if written or verbal third party verification cannot be obtained. Self-declaration of housing status (e.g., eviction) should be rare. HPRP staff must document reasons why third party written or oral verification could not be obtained in the HPRP participant file. “HPRP Self-Declaration of Housing Status” templates at www.HUDHRE.info for examples. A copy of the “HPRP Self-Declaration of Housing Status” form is under the forms section of this document.

Housing Status Documentation:

But before providing assistance through HPRP, the agency **must determine and document** if the household has any other available options or resources that may prevent them from becoming literally homeless. For all HPRP applicants documentation of the following must be in the case file:

- Other housing options (i.e., could they stay with a family member until they are able to move into a new unit or get their first paycheck?),
 - Assess and **document** all other appropriate housing options
 - Verify that no other housing options are available
 - Must be **documented** by HPRP case manager or authorized staff
 - Include assessment summary or other statement indicating that applicant has no other appropriate housing options,

- Be signed and dated by HPRP case manager or other authorized HPRP staff.
 - Include **documentation** indicating no other subsequent housing options in the case file.
- Support networks and financial resources to obtain immediate housing or remain in current housing.
 - Assess with applicant all financial resources AND support networks (i.e. friends, family or other personal sources of financial or material support)
 - Verify that applicant lacks financial resources and support networks to obtain other appropriate subsequent housing or remain in their housing.
 - **Assessment Form or Other Documentation Must:**
 - Be documented by HPRP case manager or other authorized staff.
 - Include review of current account balances in checking and savings accounts held by applicant household.
 - Include assessment summary or other statement indicating that applicant lacks financial resources and support networks to obtain other appropriate subsequent housing or remain in their housing.
 - Be signed and dated by HPRP case manager or other authorized HPRP staff
 - Include **documentation** indicating insufficient financial resources and support networks in participant case file.

NOTE: Remember, specifically for housing status, determining eligibility can be a multi-level process; applicants must meet ALL criteria and evidence of this must be present in the case file.

<p>Department of Public Health and Human Services</p> <p>HOMELESS PREVENTION AND RAPID RE-HOUSING</p>	<p>SECTION: Eligibility Requirements</p>
	<p>SUBJECT: Utility Assistance</p>

A household seeking utility only assistance may be eligible for HPRP assistance if it can be documented that they will lose their housing and become literally homeless if utility assistance is not provided and the household meets other HPRP eligibility requirements. In such cases, agency must confirm and document in the case file that the utility company will in fact disconnect the utility service if the full amount or a partial payment is not paid, that the disconnection of utility service will cause housing to be unsafe or otherwise cause eviction (i.e. if the applicant is required to maintain utilities per their lease), and that no other utility assistance (i.e. LIEAP, Energy Share or ESG) is available to prevent the shut-off.

A copy of a utility shut-off notice or arrears statement is not sufficient by itself to document program eligibility.

NOTE: There are laws governing public utilities that prevent certain utility companies from shutting off power to a unit during certain periods of the year.

<p>Department of Public Health and Human Services</p> <p>HOMELESS PREVENTION AND RAPID RE-HOUSING</p>	<p>SECTION: Eligibility Requirements</p>
	<p>SUBJECT: Treatment of Assets</p>

Assets are cash or material items that can be converted to cash quickly. They include real property, personal property, and investments that a household may possess, including assets that are owned by more than one person, but allow unrestricted access to the applicant.

Assets include:

1. Amounts in checking and saving bank accounts.
2. Stocks, bonds, savings certificates, money market funds, and other investment accounts.
3. The cash value of trusts that may be withdrawn by the household.
4. IRA, Keogh and similar retirement savings accounts, even when early withdrawal will result in a penalty.
5. Lump sum receipts of cash received and accessible by household, such as inheritances, capital gains, lottery winnings, insurance settlements, and other claims.

In Montana, HPRP applicants cannot have liquid assets totaling more than two (2) months of 80% of Fair Market Rate Value for rentals in Montana.

Department of Public Health and Human Services	SECTION: Eligible Activities
HOMELESS PREVENTION AND RAPID RE-HOUSING	SUBJECT: Activity Category

Eligible Activity Categories

1. Financial Assistance
2. Housing Relocation and Stabilization Services
3. Data Collection and Evaluation
4. Administrative costs

FINANCIAL ASSISTANCE:

Eligible Activities:

- Short-Term Rental
 - Total period of assistance cannot exceed three (3) months
 - 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
- Medium-Term Rental
 - May not exceed actual rental costs accrued over a period of 4 to 8 months.
 - 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
 - Recertify Eligibility Once Every Three Months
- Utility Assistance
 - Total period of assistance cannot exceed 18 months utilities
 - Arrears (up to 6 months) but counts toward 18-month service period
 - Utility bill must be in a household members name or proof of responsibility to pay the utility bill.
 - Cancelled Checks
 - Receipts in household members name from the utility company.
- Security Deposits
- Utility Deposits
- Moving costs
 - Truck Rental
 - Hiring a Moving Company
- Short-Term Storage fees (up to 3 months)
- Hotel/motel vouchers (up to 30 days)
 - If no appropriate shelter beds are available **AND**
 - Rental Housing has been Identified, but is not Immediately Available

HOUSING RELOCATION AND STABILIZATION SERVICES

Eligible Activities:

- Services to assist cannot exceed 18 months
- Services to assist homeless persons that need temporary assistance to obtain housing
- Services to assist persons at risk of homelessness to maintain housing
- Providing assistance to someone timing out of a transitional housing program who is going to be homeless

Eligible Services:

- Case management;
 - Counseling; Developing; Securing, and Coordinating Services;
 - Monitoring and Evaluating Program Participant Progress
 - Assuring that Program Participants' Rights are Protected
 - Developing and Individualized Housing and Service Plan
 - Staff costs to issue financial assistance
 - Cost of inspections for habitability standards
- Outreach and engagement;
 - Publicize the Availability of Programs
- Housing search and placement;
 - Tenant Counseling
 - Assisting households to understand leases;
 - Securing Utilities
 - Making Moving Arrangements
 - Representative Payee Services Concerning Rent and Utilities
 - Mediation and Outreach to Property Owners related to Locating and Retaining Housing
- Legal services;
 - Court Proceedings Related to Tenant/Landlord Matters or Housing Issues
- Credit repair
 - Provide Skills Related to Household Budgeting, Money Management
 - Accessing a Free personal Credit Report
 - Resolving Personal Credit Issues

DATA COLLECTION AND EVALUATION

Eligible Activities:

- 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
- HUD Research and Evaluation of HPRP

ADMINISTRATIVE COSTS

Eligible Activities:

- Cannot exceed 5% of grant total
- Pre-award administrative costs
- Accounting for the use of grant funds
- Preparing reports for submission to HUD
- Obtaining program audits
- Agency staff salaries associated with eligible administrative costs
- HPRP training for program administrator and case managers

<p style="text-align: center;">Department of Public Health and Human Services</p> <p style="text-align: center;">HOMELESS PREVENTION AND RAPID RE-HOUSING</p>	<p style="text-align: center;">SECTION: Ineligible Activities</p> <hr/> <p style="text-align: center;">SUBJECT: Ineligible Activities</p>
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INELIGIBLE ACTIVITIES:

- Duplicating payments– using HPRP funds and another source for exact same cost type for same time period
- Mortgage assistance/costs
- Legal Services related to Mortgages
- Operations costs for housing programs
- Assistance longer than 18 months
- Direct payments to program participants
- Payment of credit arrears (credit cards, loans, other consumer debit etc.)
- Construction or rehabilitation
- Pet Care
- Car Repair
- Medical/Dental Care
- Medication
- Clothing and Grooming
- Entertainment Activities
- Cash Assistance
- Work or Education Related Materials
- Non-housing services, such as:
 - Child care
 - Employment training
 - Education (i.e. books, fees, tuition, etc.)
 - Transportation (i.e. gas, bus tokens, cabs, travel costs, etc.)
 - Food, household items, clothing
 - Furniture and appliances
- Discharge planning at institutions (hospitals, jails or prisons)
- Transitional Housing (TH) Policy
 - Providing HPRP assistance to help someone move into a TH program
 - Providing assistance while someone is living in a TH program
- Planning or developing new HMIS systems
- Development of New Software
- Implementing a comparable database when CoC has a HMIS system
- Contracting for program evaluation
- Certifications, Licenses and General Training Classes (e.g. for a case manager to gain credentials)

		HPRP 5-0
Department of Public Health and Human Services	SECTION: Rent Reasonableness	
HOMELESS PREVENTION AND RAPID RE-HOUSING	SUBJECT: Determine Allowable Rent	

Rent reasonableness is determined on a case-by-case basis. Rent reasonableness should be determined by considering the following:

1. The reasonableness in relation to rents being charged for comparable unassisted units, taking into account the location, size, type, quality, amenities, management, and maintenance of each unit.
2. The rent should not be in excess of rents currently being charged by the same owner for comparable unassisted units. As the notice states, this comparison can include units advertised for rent as well those actual rents charged.

Agencies must determine and document rent reasonableness for all units for which HPRP rental assistance (including arrears) and/or security deposit assistance is being provided. The requirement applies whether homelessness prevention assistance or rapid re-housing assistance is provided (i.e. when participants are moving into units and when there is a current lease in place).

If the rent for the unit does not meet the rent reasonableness standard, then HPRP funds may not be used to assist the household in that unit. Further, HPRP funds cannot be used to pay the rent up to the rent reasonable standard, while the tenant pays the remainder. However, an eligible household could receive HPRP assistance to relocate to another unit that does comply with rent reasonableness standards, and is ultimately more affordable to the household.

Fair Market Rents (FMRs) are not applicable under HPRP. As explained in the HPRP Notice, HPRP rental assistance may only be used to assist eligible households in units that meet rent reasonableness standards. Therefore, assistance may be provided for units that exceed the FMR as long as the rent meets the rent reasonableness standard.

In the Notice, HUD set a requirement that rents must be in compliance with the HUD standard of "rent reasonableness." This would include rental payments, rental arrears, and security deposits. However, it is up to the grantee to determine exactly which documentation it will require in order to ensure that the rent reasonableness standard is met. Agencies may choose to use the "Rent Reasonableness Checklist and Certification" template found at:

- <http://www.hudhre.info/documents/RentReasonableChecklist.doc> or
- Under the forms section of this document.

		HPRP 6-0
Department of Public Health and Human Services HOMELESS PREVENTION AND RAPID RE-HOUSING	SECTION: Confidentiality	
	SUBJECT: Client Privacy	

Each agency must develop and implement procedures to ensure:

1. The confidentiality of records pertaining to any individual provided HPRP assistance;
and
2. That the address or location if any assisted housing will not be made public, except to the extent that this prohibition contradicts a pre-existing privacy policy of the agency.

		HPRP 7-0
Department of Public Health and Human Services HOMELESS PREVENTION AND RAPID RE-HOUSING	SECTION: Termination of Housing Assistance	
	SUBJECT: Request for Administrative Review	

The agency may terminate assistance to a household who violates program requirements. In terminating assistance to a household, the agency must provide and document in the case file a formal process that recognizes the rights of individuals receiving assistance to due process of law. This process, at a minimum, must consist of:

1. Written notice to the program participant containing a clear statement of the reasons for termination. The agency may send the Termination Notice form letter or similar letter;
2. A review of the decision, in which the program participant is given the opportunity to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the termination decision; and
3. Prompt written notice of the final decision to the program participant.

A copy of the Termination Notice form letter and the “Request for Administrative Assistance” form is included under the forms section of this document.

*updated September 15, 2010

<p>Department of Public Health and Human Services</p>	<p>SECTION: Inspections</p>
<p>HOMELESS PREVENTION AND RAPID RE-HOUSING</p>	<p>SUBJECT: Habitability Standards</p>

An on-site inspection is required anytime a program participant is receiving HPRP financial assistance and moving into a new unit. (Financial assistance includes rental assistance, security deposit assistance, utility assistance, etc.) A housing unit inspection is *not* required for a program participant served with HPRP prevention assistance in a unit in which the participant was already residing. Habitability inspections are also not required for persons receiving services only.

Following are the habitability standards that grantees must follow:

- The unit must be in compliance with all applicable state and local housing codes and licensing requirements.
- Structure and materials must be structurally sound so as not to pose any health and safety threat to occupants and to protect occupants from the elements.
- Access must be accessible to occupants without being accessible to unauthorized persons, and must provide an alternate means of egress in case of fire.
- Space and security must afford adequate space and security for occupants and belongings including an acceptable place to sleep.
- Interior air quality each room or space must be provided with natural or mechanical ventilation and must be free of air pollutants at levels that threaten the health of the occupants.
- Water supply must be free from contamination.
- Sanitary facilities Residents must have access to sufficient sanitary facilities that are in proper operating condition, may be used in privacy, and are adequate for personal cleanliness and the disposal of human waste.
- Thermal environment must have adequate heating and or cooling facilities in proper working condition.
- Illumination and electricity must have adequate natural or artificial illumination to permit normal indoor activities and to support the health and safety of occupants. Sufficient electrical sources must be provided to permit use of essential electrical appliances while assuring safety from fire.
- Food preparation and refuse disposal all food preparation areas must contain suitable space and equipment to store, prepare, and serve food in a sanitary manner.
- Sanitary condition housing and any equipment must be maintained in a sanitary condition.
- Fire safety
 - Each dwelling must include at least one battery-operated or hard-wired smoke detector, in proper working condition, on each occupied level of the unit.

Smoke detectors must be located, to the extent practicable, in a hallway adjacent to a bedroom. If the unit is occupied by hearing-impaired persons, smoke detectors must have an alarm system designed for the hearing-impaired in each bedroom occupied by a hearing-impaired person.

- Public areas of all housing must be equipped with a sufficient number, but not less than one for each area, of battery-operated or hard-wired detectors. Public areas include, but are not limited to, laundry rooms, community rooms, day care centers, hallways, stairwell, and common areas.

The Housing Quality Standards (HQS) used for other HUD programs are more stringent than the habitability standards outlined in the HPRP Notice. Agencies are not required to use HQS, but may do so if they choose.

Habitability standards do *not* require a certified inspector to conduct on-site inspections.

Inspections must be conducted upon initial occupancy and then on an annual basis for the term of HPRP assistance.

Agencies should use the “HPRP Habitability Standards Checklist” (available on HUD’s Homelessness Resource Exchange at <http://hudhre.info>) as a guide to conduct the on-site inspection. This checklist should be completed upon initial occupancy and on an annual basis for the term of HPRP assistance. Copies of the completed checklists should be included in the case files for documentation purposes. The “HPRP Habitability Standards Checklist” is also available in the forms section of this document.

<p style="text-align: center;">Department of Public Health and Human Services</p> <p style="text-align: center;">HOMELESS PREVENTION AND RAPID RE-HOUSING</p>	<p style="text-align: center;">SECTION: Inspections</p> <hr/> <p style="text-align: center;">SUBJECT: Lead-Based Paint Requirements</p>
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The lead-based paint requirements exist to protect vulnerable families from potential health hazards. To prevent lead-poisoning in young children, agencies must comply with the Lead-Based Paint Poisoning Prevention Act of 1973 and its applicable regulations found at CFR 35, Parts A, B, M, and R. As agencies that provide assistance to and advocate on behalf of disadvantaged populations, it is important to understand that the lead rule is a tool that helps you ensure the safety and well-being of your clients.

Under HPRP, the rule is that a lead-based paint visual assessment must be completed for all units that meet the three following conditions:

1. The household living in the unit is being assisted with HPRP financial assistance (rent assistance, utilities assistance, utility/security deposits, or arrears).
2. The unit was constructed prior to 1978.
3. A child under the age of six is or will be living in the unit.

The lead requirements apply regardless of whether a household is remaining in an existing unit or moving to a new unit. The visual assessment must be completed prior to HPRP assistance being provided, and annually thereafter.

There are certain exceptions to the rule. Visual assessments by HPRP staff are not required under the following circumstances:

- It is a zero-bedroom or Single Room Occupancy (SRO) sized unit (studio apartments, dormitories, etc.);
- X-ray or laboratory testing of all painted surfaces by certified personnel has been conducted in accordance with HUD regulations and the unit is officially certified to not contain lead-based paint;
- The property has had all lead-based paint identified and removed in accordance with HUD regulations;
- The client is receiving Federal assistance from another program, where the unit has already undergone a visual assessment within the past 12 months – e.g., if the client has a Section 8 voucher and is receiving HPRP assistance for a security deposit or arrears (note, in such cases, HPRP staff are required to obtain documentation that a visual assessment has been conducted from the agency administering the other form of assistance for the HPRP case file); or
- It meets any of the other exemptions described in 24 CFR Part 35.115(a).

If any of the conditions outlined above are met, HPRP program staff simply need to document the condition by completing the *HPRP Lead Screening Worksheet* (available on the HUD HRE) and placing a copy in the case file. (Note: While grantees are required to document compliance with the lead rule, they are not required to use this particular screening worksheet. This tool was developed as a sample to assist agencies who may be looking for resources to use in their local programs.) Remember, regardless of these exceptions, all properties are still subject to the disclosure requirements.

Disclosure requirements: Disclosure requirements are triggered for ALL properties constructed prior to 1978. These requirements require that **property owners or managers** provide tenants with:

- HUD’s disclosure form for rental properties disclosing the presence of known and unknown lead-based paint; *AND*
- A copy of the “Renovate Right: Important Lead Hazard Information for Families, Child Care Providers and Schools” pamphlet. Both the disclosure form and pamphlet are available at:
<http://hud.gov/offices/lead/library/lead/renovaterightbrochure.pdf>. As explained, this requirement actually relates to property owners/managers, but sharing this information with your clients (or ensuring they have received it) is an easy thing to do and will make your job easier. HPRP assessments are an important opportunity to educate clients about the potential hazards related to lead and their rights as tenants. Informed tenants are more likely to watch for potential problems in their home and proactively work with landlords to address any issues.

Program staff should consider sharing the following documents available on Homelessness Resource Exchange at <http://www.hudhre.info> with property owners/managers as well as residents to outline responsibilities and provide additional guidance:

- Instructions for Property Owners Template
- Instructions for Residents Template

Depending on the results of the visual assessment, additional steps may be required before assistance can be provided for that unit.

HPRP Program Staff Responsibilities

1. Determine whether lead-based paint requirements are triggered
2. Inform HPRP client and property owner of the lead-based paint requirements and schedule visual assessment.
3. Conduct visual assessment
4. Identify risks and compare to “de minimis” level
5. Make assistance determination.
6. Confirm all identified deteriorated paint has been stabilized.
7. Respond to a child with elevated blood leads levels.
8. Conduct ongoing lead-based paint monitoring. (Annually)

HPRP program staff is responsible for ensuring that property owners/managers understand their responsibilities with regard to lead-based paint hazards.

Property Owner/Manager Responsibilities

1. Distribution of pamphlets and disclosure notice to occupants.
2. Perform paint stabilization.
3. Use safe work practices.
4. Obtain clearance.
5. Provide Notice of Lead Hazard Reduction to tenants.
6. Conduct ongoing lead-based paint maintenance.

Anyone may become a HUD-Certified Visual Assessor by successfully completing a 20-minute online training on HUD's website at:

<http://www.hud.gov/offices/lead/training/visualassessment/h00101.htm>. The training teaches individuals how to identify deteriorated paint and how deteriorated paint must be treated.

HPRP 9-0	
Department of Public Health and Human Services HOMELESS PREVENTION AND RAPID RE-HOUSING	SECTION: Client File Documentation Requirements
	SUBJECT: HPRP Audit Checklist

The Audit Checklist and the HUD's 'Eligibility Determination and Documentation Guidance must be used as the basis for documenting the HPRP client files to be in compliance with HUD standards.

The following documentation will be evaluated during monitoring visits:

1) **Local Program Guidelines for Program Managers, Intake Specialists**

- Maximum assistance available
- Services available
- Eligibility requirements

2) **Initial Consultation and Application Packet**

- Application process and requirements information available to clients
- Intake or application form
- Signed Confidentiality Release Form (if > 18)
- Appeals process
- Notification of Penalty for providing false information
- Initial summary sheet or short summary with basic info, e.g. contact info.
- Case notes on first meeting, including immediacy of need and appropriate type of assistance available.

3) **Income Determination**

A. Initial Determination

- HPRP Income Worksheet complete, percent of AMI determined and < 50% AMI
- Verification of incomes and appropriate documentation for specific income types in file
 - o Third-party verifications in writing (e.g. employer, SSA, welfare office). Appropriate documentation meets requirements for specific type of income.
 - o Third-party oral documentation by staff receiving verification. Written description of efforts to obtain 3rd party verification and reasons why they could not be obtained.
 - o Self-Declaration of Income Document in file. Written description of efforts to obtain written and oral verifications and reasons why they could not be obtained.

- Assets Test documentation that assets not > than 2months of 80% of fair Market Rate Value for rentals in Montana.
- All documentation dated within 30 days of application; a benefits statement for public assistance (e.g. SSI, SNAPS) that reflects current benefits within 12 months is acceptable.

4) Housing Status:

- A. If Homeless, one of the following, in priority order, is required:
- Homeless Certification form, or
 - Third-party verification letter with necessary elements and written description to obtain third-party documentation or explanation why lower documentation standard was necessary.
 - Self-declaration of housing Status Completed and written description to obtain third-party documentation or explanation why lower documentation standard was necessary.
- B. If At-Risk of Losing Home
- Appropriate documentation supporting specific “risk” factors (see HUD guidance), including:
 - o Eviction Notice,
 - o Landlord Letter Listing Rental Arrearage Amount,
 - o Landlord Letter Attesting to Eviction if Rent Arrears not Corrected,
 - o Foreclosure Notice for Residence Being Rented,
 - o Utility Shut Off Notice,
 - o Notice of Condemnation,
 - o Other.
- C. No Appropriate subsequent housing options identified:
- Assessment form or other documentation of no other housing options
- D. Household lacks financial resources and support networks needed:
- Assessment form or other documentation indicating insufficient resources and support networks.

5) Eligibility Determination:

- Consistent documentation of budget information and calculations (e.g. budget worksheet)
- Client scoring sheet or other documentation that assesses risk factors, immediacy of need, etc. and provides for a determination of both eligibility and award that is consistent, fair and objective.
- Case notes (from social workers) for all subsequent meetings, phone calls, etc.

6) Assistance Award:

- Housing Relocation and Stabilization Plan (or similar action plan) in file
- Copies of signed voucher acceptance letters and signed W-9 (if appropriate)in file
- Voucher tracking sheet (#, amounts, services)
- If client moves into a new (different) apartment/house, copy of Habitability Inspection in file.
- If household is living in or moving in to a unit that was built prior to 1978 and a child under the age of 6 will be living there, a lead-based paint inspection is completed and form is in file.
- Rent Reasonableness checklist and certification in file

- Legal lease or MOU/rental agreement with applicant's name
- Staff Certification of Eligibility signed by staffer who determined eligibility and HPRP Supervisor

7) Three (3) Month Re-certification of Mid-Term Assistance Clients (financial and services clients)

- Income verification (#3)
- Housing Status Determination (#4)
- Eligibility Determination (#5)
- Assistance Award Documentation (as appropriate, #6)

8) Progress Monitored

- Follow-up on stabilization or action plan or other plan to achieve sustainability

9) Reporting:

- Client data entered into HMIS (at least at initial consultation, financial assistance and at exit)

10) Other:

- Policies and Procedures (including termination process)

<p>Department of Public Health and Human Services</p> <p>HOMELESS PREVENTION AND RAPID RE-HOUSING</p>	<p>SECTION: Other Federal Requirements</p>
	<p>SUBJECT: Conflict of Interest Waiver Requirement</p>

There are two situations that are often referred to as a “conflict of interest.”

- 1) The first is when HPRP program participants are to be assisted in a property that is owned by the agency or affiliated organization of the agency. In this instance, a grantee must submit a letter to the CPD Director requesting a waiver for good cause.

The waiver must:

- a. Include a description of the benefit(s) to HPRP participants;
 - b. Explain how the agency disclosed the conflict and addresses/mitigates any potential issues;
 - c. Demonstrate that the agency has looked for other appropriate housing and it is not available, or there is a good reason why the agency housing is better for the clients;
 - d. Demonstrate that the subsidy is not tied to a unit (clients have to be able to choose the agency housing);
 - e. Demonstrate that an attorney has reviewed the housing selections and determined that the activities proposed do not violate state and local law; and
 - f. Demonstrate that there is no implied benefit to any individual or organization.
- 2) The second type of conflict of interest that can occur is at the individual level (as opposed to the agency level). The HPRP Notice states: “No person who is an employee, agent, consultant, officer, or elected or appointed official of the grantee and who exercises or has exercised any functions or responsibilities with respect to assisted activities, or who is in a position to participate in a decision-making process or gain inside information with regard to such activities, may obtain a personal or financial interest or benefit from the activity, or have an interest in any contract, subcontract, or agreement with respect thereto, or the proceeds there under, either for himself or herself or for those with whom he or she has family or business ties, during his or her tenure or for one year thereafter.” (emphasis added)

NOTE: Employees of an agency and their families are not automatically disqualified from receiving HPRP assistance, as long as they meet the qualifications of the above paragraph (i.e., they are not in a position to exercise any responsibilities, make decisions about, gain inside information into, or obtain a personal benefit from HPRP). This situation would be more likely in a large agency than it would in a very small agency.

When a conflict of interest exists, the grantee may seek an exception by writing to the local HUD Field Office, including the following information:

- For states and other governmental entities, a disclosure of the nature of the conflict, accompanied by an assurance that there has been public disclosure of the conflict and a description of how the public disclosure was made; and
- For all grantees, an opinion of the grantee's attorney that the interest for which the exception is sought would not violate state or local law.

If there is a question or the appearance of a conflict of interest of any type, the agency should contact the local HUD field office to determine if an exception or waiver is needed.

<p style="text-align: center;">Department of Public Health and Human Services</p> <p style="text-align: center;">HOMELESS PREVENTION AND RAPID RE-HOUSING</p>	<p>SECTION: Other Federal Requirements</p> <hr/> <p>SUBJECT: Nondiscrimination and Equal Opportunity Requirements</p>
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D. Nondiscrimination and Equal Opportunity Requirements

Agencies must comply with all applicable fair housing and civil rights requirements in 24 CFR 5.105(a).

Agencies must make known that HPRP rental assistance and services are available to all on a nondiscriminatory basis and ensure that all citizens have equal access to information about HPRP and equal access to the financial assistance and services provided under this program.

Each agency must take reasonable steps to ensure meaningful access to programs to persons with limited English proficiency (LEP), pursuant to Title VI of the Civil Rights Act of 1964. This may mean providing language assistance or ensuring that program information is available in the appropriate languages for the geographic area served by the jurisdiction and that limited English proficient persons have meaningful access to HPRP assistance.

To assist the agencies, HUD published the “Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons” (72 42 Federal Register 2732; January 22, 2007). This document can be accessed at the following website:

[http://www.nhlp.org/files/Limited%20English%20Proficiency%20Outline%20%20\(2--6.17.09\).pdf](http://www.nhlp.org/files/Limited%20English%20Proficiency%20Outline%20%20(2--6.17.09).pdf).

In addition, all notices and communications shall be provided in a manner that is effective for persons with hearing, visual, and other communication-related disabilities consistent with section 504 of the Rehabilitation Act of 1973 and implementing regulations at 24 CFR 8.6.

If the procedures that the grantee intends to use to make known the availability of the rental assistance and services are unlikely to reach persons of any particular race, color, religion, sex, age, national origin, familial status, or disability who may qualify for such rental assistance and services, the grantee must establish additional procedures that will ensure that such persons are made aware of the rental assistance and services.

<p style="text-align: center;">Department of Public Health and Human Services</p> <p style="text-align: center;">HOMELESS PREVENTION AND RAPID RE-HOUSING</p>	<p>SECTION: Reporting Requirements</p>
	<p>SUBJECT: Reporting</p>

REPORTING GUIDELINES

The State of Montana is required to use the following four systems to input data related to the Homeless Prevention and Rapid Re-Housing Program. Each system is listed below as is the requirements that the state has imposed on the Human Resource Councils.

1. **FederalReporting.gov** is managed by the White House Office of Management and Budget (OMB). OMB is requiring HPRP grantees to submit data common to all Recovery Act programs in FederalReporting.gov every quarter.

- Agencies are required to submit a monthly invoice with the HPRP Stimulus work book to the Fiscal Officer at the State by the 10th of every month. The work book needs to be emailed and the invoice can be faxed, mailed or emailed with a signature.

Included in the workbook is the following (Items may change as needs for the report change):

- Invoice
- HPRP Program Payment Certification
- Contract Summary
- Invoice Details
- Number Served
- Hours
- FTE Table (for informational purposes)

2. **E-snaps** is an electronic grants management system managed by HUD’s Office of Special Needs Assistance Programs (SNAPS). HUD will collect HPRP-specific performance and expenditure data through *e-snaps* every quarter via four Quarterly Performance Reports (QPRs) per year, as well as via an Annual Performance Report (APR) once per year.

3. HUD’s **Integrated Disbursement and Information System (IDIS)** is the financial management system through which the Department must draw down funds. The Department will not be entering any performance or beneficiary data into IDIS.

- Agencies must submit a work plan on how their money will be allocated. These amounts are inputted into IDIS. The agency must track their expenditures and ensure they are not overspending in any one budget category. If more authority is needed in any one budget category a revised work plan is required before the invoice will be paid.

4. A **Homeless Management Information System** (HMIS) is a client-level data collection and management system implemented at the community level that allows for better coordination among agencies providing services to clients. It is not a national reporting system and it is not designed to be a financial reporting/accounting system. Agencies providing HPRP assistance **MUST** enter client-level data into their community's HMIS so the community can provide aggregate data to grantees (which is then reported through *e-snaps* and FederalReporting.gov).

<p style="text-align: center;">Department of Public Health and Human Services</p> <p style="text-align: center;">HOMELESS PREVENTION AND RAPID RE-HOUSING</p>	<p>SECTION: Reporting Requirements</p>
	<p>SUBJECT: HMIS</p>

HMIS DATA ENTRY DEADLINES

All data for a quarter must be entered by the 5th day following the end of the quarter. This allows that information to be included in the Quarterly Performance Report (QPR) submission to HUD.

HMIS DATA ENTRY STANDARDS

Please refer to the HMIS Data Standards for a discussion of the data standards for collecting and entering information for clients. This is available at <http://www.hudhre.info/HPRP/>

1. Enter data on all the clients that are in the family/household. Make sure you search for every client to avoid the creation of duplicates.
2. In the master block and Demographics tab, make sure to enter the **Universal Data Elements**:
 - Name
 - Social Security Number
 - Date of Birth
 - Race
 - Ethnicity
 - Gender
 - Veterans Status
 - Disabling Condition
 - Residence Prior to Program Entry
 - Zip Code of Last Permanent Address

Note: The system creates the Personal Identification Number and Household Number when the record is saved.

3. In the Income Tab, Demog 2 Tab and Secure Information Module (using the Secure Info navigation button), you should enter **Program-Specific Data Elements** for each member of the family:
 - Income and Sources
 - Non-Cash Benefits
 - Physical Disability
 - Developmental Disability
 - Chronic Health Condition
 - HIV/AIDS
 - Mental Health

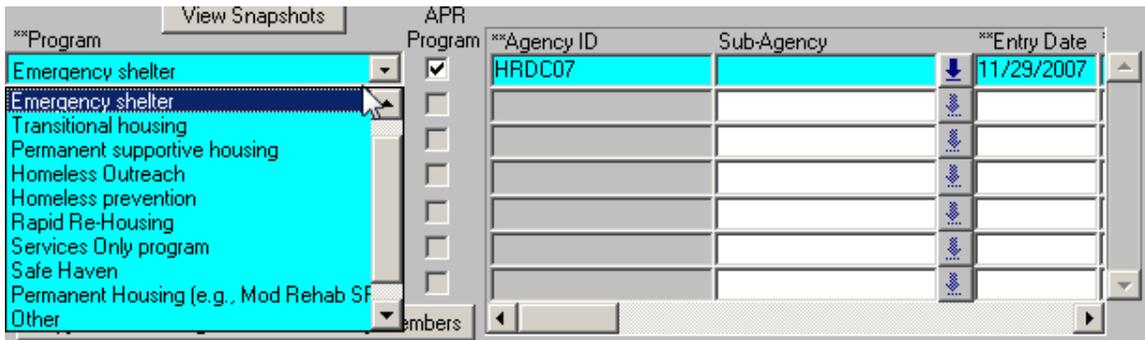
- Substance Abuse
- Domestic Violence

4. Enter optional data elements desired by the Agency for reports.
5. Create a household, beginning with the head of household and ensuring all members of the household are added.
6. Create program entry information in the Program tab making sure you are using the head of household client record. *If you have completed the information above you should receive no warning messages!*

Note: The date of the program entry must be the same as the first start date of either the Financial Assistance or Housing Relocation and Stabilization Service

Universal Data Elements include:

- Program Entry Date
- Program Exit Date
- Housing Status (CAN NOT BE “DON’T KNOW” OR “REFUSED”)



Note: For HPRP program, you must select either Homeless Prevention or Rapid Re-Housing. Please select the HPRP as the Sub-Agency so that our reporting is accurate. You will need to enter the housing status at the time of program entry. The housing status cannot be “don’t know” or “refused”.

7. Copy program entry information to other family members.
8. Add Services as appropriate to document the case record.

Note: Please note that you do not enter the Financial Assistance or Housing Re-location or Stabilization Services in the Services Tab. Also, you do not need to enter the services in the CDS system. These will be moved when the interface is implemented.

9. If the client is no longer eligible for the program, leaves or is no longer being served they must be exited using the Program Tab. Record the month, day and year of last day of service or the last day the person is in the program.
 - Make sure that you review and update the housing status as appropriate.
 - Program specific data elements include:

- Destination

Note: The client is not exited for changes in status due to benefits received. However, you must change the Housing Status in the program tab to reflect the household's current situation.

Note if you do Street Outreach you will need to enter the appropriate information in the Outreach tab.

Enter the Financial Assistance and/or Housing Relocation and Stabilization Services in the HPRP FA/HRSS tab using the Head of Household assigned in step 5. *Entering this before the program entry allows the system to meet the federal requirement of reporting program entry for HPRP clients that have received a benefit.*

Note: The date of the program entry must be the same as the first start date of either the Financial Assistance or Housing Relocation and Stabilization Service

Financial Assistance Provided

The screenshot shows a software interface with several tabs at the top: Demographics, Income, Demog 2, Household Info, Program, HPRP FA/HRSS (selected), and Employment/Education. Below the tabs are two data entry sections. The first section is titled 'HPRP Financial Assistance' and contains a table with columns: Type, Start Date, End Date, Months, Amount, and County. The second section is titled 'HPRP Housing Relocation and Stabilization Services Provided' and contains a similar table. In both tables, the first row is highlighted in cyan, indicating it is the active row for data entry.

HPRP Financial Assistance (this is actual checks that are paid on behalf of a client):

1. Short-Term Rental Assistance (maximum 3 months)

Note: The begin date must not be prior to the program entry date. If the program entry date is before then this would be considered arrears.

- Start Date & End Date (the time period the rent check is meant to cover e.g. 10/01/2009 – 10/31/2009. This is not the date the check is written it is the rent payment period.
- Months (the number of months the rent check represents). In the example above the number of months would be one (1).
- Amount - the amount paid
- County - the county where the client resides

Note: If the client was provided two months rent and the check was issued 9/28/2009 for rent for October and November then the Start date would be 10/01/2009 and the End Date would be 11/30/2009 and the Months would equal 2. If the client was provided one month of rent and the rent check was issued 10/15/2009 and the rent was for the month of October, the Start Date would be 10/1/2009 and the End Date would be 10/31/2009.

2. Medium-Term Rental Assistance

- Same as Short-term Rental Assistance

3. Rental Assistance-Arrears

- Start Date & End Date (the date the check was issued e.g., 10/1/2009 – 10/1/2009)
- Months (the number of months the rent check represent and the arrears cannot be for more than 6 months) which must be calculated because the client can receive a maximum of 18 months assistance
- Amount - the amount paid
- County - the county where the client resides

4. Security Deposits

- Start Date & End Date (the date the check was issued e.g., 10/1/2009 – 10/1/2009)
- Months - 1 as there is no calculation on the months
- Amount- the amount paid
- County - the county where the client resides
- What to do when the security deposit includes the last month of rent?

5. Utility Deposits

Start Date & End Date (the date the check was issued e.g., 10/1/2009 – 10/1/2009)
Months - 1 as there is no calculation on the months
Amount - the amount paid
County - the county where the client resides

6. Utility Payments – Regular

- The begin date must not be prior to the program entry date. If the program entry date is before then this would be considered arrears.
- Start Date & End Date (the time period the check is meant to cover e.g. 10/01/2009 – 10/31/2009)
- Months (the number of months the check represents)
- Amount - the amount paid
- County - the county where the client resides

7. Utility Payments – Arrears

- Start Date & End Date (the date the check was issued e.g., 10/1/2009 – 10/1/2009)
- Months (the number of months the utility check represent and the arrears cannot be for more than 6 months) which is calculated because the client can receive a maximum of 18 months assistance
- Amount - the amount paid
- County - the county where the client resides

8. Moving Cost Assistance

- Start Date & End Date (the date the check was issued e.g., 10/1/2009 – 10/1/2009)
- Months - 1 as there is no calculation on the months
- Amount - the amount paid
- County - the county where the assistance is provided

9. Motel & Hotel Vouchers

- Start Date & End Date (the lodging dates the check covers e.g., 10/1/2009 – 10/10/2009 with a maximum stay of 30 days.
- Months - 1 as there is no calculation on the months
- Amount - the amount paid
- County - the County in which the client was provided motel & hotel vouchers

HPRP Housing Relocation and Stabilization Services Provided

Type	Start Date	End Date	Months	Amount	County

***After much consideration regarding the difficulty of assigning a dollar amount to the individual client services, it was decided that the amount should be entered as 0 on the client record and the amount should be provided by fiscal on a quarterly basis for reporting quarterly reporting purposes.

1. Case Management

- Start Date and End Date would reflect the time period served – which should be month(s)
- Months – the number of months the service entered reflects
- Amount – would be zero (please see the discussion above ***)

2. Outreach and engagement (the cost associated with this category may include clients that are not provided Financial Assistance.)

- Start Date and End Date would reflect the time period served – which should be month(s)
- Months – the number of months the service entered reflects
- Amount – would be zero (please see the discussion above ***)

3. Housing search and placement

- Start Date and End Date would reflect the time period served – which should be month(s)
- Months – the number of months the service entered reflects
- Amount – would be zero (please see the discussion above ***)

4. Legal Services

- Start Date and End Date would reflect the time period served – which should be month(s)
- Months – the number of months the service entered reflects
- Amount – would be zero (please see the discussion above ***)

5. Credit Repair

- Start Date and End Date would reflect the time period served – which should be month(s)
- Months – the number of months the service entered reflects
- Amount – would be zero (please see the discussion above ***)

The agencies must enter Financial Assistance/Housing Relocation and Stabilization services in the 'HPRP FA/HRSS' tab using the Head of Household on a monthly basis as appropriate.

The client must be certified once every three months and information should be updated from the client intake. A client intake form may be printed from the HMIS system showing the current record. This intake can then be updated by the client. The updated information must be entered into the HMIS system.

		HPRP 12-0
Department of Public Health and Human Services	SECTION:	Glossary of Terms
HOMELESS PREVENTION AND RAPID RE-HOUSING	SUBJECT:	Terms and Acronyms

Agency: means any private non-profit organization or unit of general local government to which a grantee provides funds to carry out the eligible activities under the grant and which is accountable to the grantee for the use of the funds provided. See also **Subgrantee**.

APR: Annual Performance Report

Assessment – is a deeper level of inquiry into the actual problem and the client’s strengths and needs related to solving the problem. Assessment helps with service-matching and provides the information needed to determine the expected type, intensity, and duration of assistance a client or household might receive;

CAA: Community Action Agency. See **Subgrantee or Agency**.

CoC: Continuums of Care

Current Income: is the income that the household is currently receiving at the time of application for HPRP assistance. Income recently terminated should not be included.

De minimus is a Latin expression that, in the risk assessment world, refers to a level of risk that is too minimal to cause concern.

Department: means the legal entity to which HUD awards an HPRP grant and which is accountable for the use of the funds provided. See also **Grantee**.

Grantee (Department): means the legal entity to which HUD awards an HPRP grant and which is accountable for the use of the funds provided.

Gross Income is the amount of income earned before any deductions (such as taxes and health insurance premiums) are made.

Homeless Management Information System (HMIS) is a client-level data collection and management system implemented at the community level that allows for better coordination among agencies providing services to clients. It is not a national reporting system and it is not designed to be a financial reporting/accounting system. Agencies providing HPRP assistance must enter client-level data into their community’s HMIS so the community can provide

aggregate data to grantees (which is then reported through *e-snaps* and FederalReporting.gov).

Homelessness: is defined by section 103 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11302)

- an individual who lacks a fixed, regular, and adequate nighttime residence; and
- an individual who has a primary nighttime residence that is
 - Sleeping in an emergency shelter; designed to provide temporary living accommodations (including welfare hotels, congregate shelters, and transitional housing for the mentally ill);
 - Sleeping in a public or private place not meant for human habitation, such as cars, parks, abandoned buildings, streets/sidewalks;
 - Staying in a hospital or other institution for up to 180 days but was sleeping in an emergency shelter or other place not meant for human habitation (cars, parks, streets, etc.) immediately prior to entry into the hospital or institution;
 - Graduating from, or timing out of a transitional housing program; and
 - Victims of domestic violence.

HRDC: Human Resource Development Council. See **Subgrantee or Agency**.

Income Inclusions: Types of income to be counted

Income Exclusions: Types of income that are not to be counted as income

Intake – the general process between the client’s first point of contact and the decision whether or not to admit the client to a program. The intake process can include screening, assessment, referral, and verification. Intake may or may not result in program admission;

Integrated Disbursement and Information System (IDIS) is the financial management system through which HPRP grantees must draw down funds. HPRP grantees will not be entering any performance or beneficiary data into IDIS.

IPR: Initial Performance Report

LEP: Limited English Proficiency persons include anyone “who does not speak English as their primary language and who have a limited ability to read, write, speak, or understand English . . . “(HUD LEP Guidance, 72 Fed. Reg. 2732) (Jan. 22, 2007)).

PASS: Plan to Attain Self-Sufficiency- This is excluded income

QPR: Quarterly Performance Report

Referral – referring a client to a particular program for possible help, without any obligation on the part of the receiving program to actually offer or provide the help;

Reparations: Payments paid by a foreign government pursuant to claims filed under the laws of the government by persons who were persecuted during the Nazi era.

Screening – a first-level decision about whether the client is eligible for a program and/or would have a priority for those services. Screening determines who receives assistance;

Subgrantee (Agency/CAA/HRDC): means any private non-profit organization or unit of general local government to which a grantee provides funds to carry out the eligible activities under the grant and which is accountable to the grantee for the use of the funds provided.

Targeting – process of determining the population to whom assistance will be directed. That is, the target population. The targeting process can occur at both the system and the program levels.

Verification – the gathering and review of information to substantiate the crisis situation and support program eligibility and priority determinations