



U.S. Department of Housing and Urban Development

HUDHRE.info

Homelessness Resource Exchange

Frequently Asked Questions (FAQs)

HPRP

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Topic: Eligible Activities and Participants

Date	Program/System	Question	Answer
8/14/09	HPRP	Can HPRP funds be used to help a household purchase furniture?	As stated in the Notice, HPRP funds may not be used to help participants purchase furniture. However, there are a number of resources available to help households who need assistance furnishing an apartment. Visit http://www.nationalfurniturebank.org/index.html to find a furniture bank in your community.
8/14/09	HPRP	Is there any cap on relocation expenses? In other words, can a grantee use HPRP funds to help a client relocate to a different state, or from one end of a state to another?	There is no cap on relocation expenses. However, if a grantee decides to help a client relocate to a different state or another area of a state, the grantee retains responsibility for ensuring that all requirements associated with the program are met, either by the grantee or another grantee. This includes documentation of rent reasonableness, conducting the habitability and lead-based paint inspections, and conducting reassessments every three months.
8/14/09	HPRP	HUD has indicated that grantees may provide rental assistance or services to eligible program participants who are residing or would like to reside outside their jurisdiction. Does this mean that grantees can serve persons in another state?	It is up to the grantee to determine if they wish to assist persons in another state. This may be common where a metropolitan community or Continuum of Care crosses state boundaries. However, if they do so, the grantee retains responsibility for ensuring that all requirements associated with the program are met, either by the grantee or another grantee. This includes documentation of rent reasonableness, conducting the habitability and lead-based paint inspections, and conducting reassessments every three months.
8/14/09	HPRP	Can grantees pay off a client's rental debt owed to a previous landlord if it enables the household to obtain new housing?	Yes. Grantees/subgrantees can pay up to six months of rental and utility arrears regardless of when they were incurred, provided that the existence of the arrears prevents the eligible participant from obtaining housing, and it is likely that the participant will be able to maintain the housing. All other arrears--e.g., credit card, car payments, medical expenses, cable, or phone bills--are considered bad debt and are not eligible expenses.
8/14/09	HPRP	When a grantee provides security deposit assistance, must they recover the deposit if/when the household moves?	HUD is giving grantees the discretion to determine how to handle security deposits. The grantee may recover the security deposit, in which case it must be treated as program income. Alternately, the grantee may allow the household to keep the deposit and use it towards their next unit. Finally, the landlord or property management company may keep a portion of the deposit if it is needed to pay for costs incurred by the tenant such as damages to the unit.
8/14/09	HPRP	Is payment of rented trailer pads/lots on which a mobile home residence rests an eligible expense under HPRP?	Rental assistance or arrears to pay for a lot on which a trailer is located can be eligible under financial assistance, although it is up to the grantee to determine whether to use HPRP funds for financial assistance costs associated with manufactured homes/trailer pads. HUD does not prohibit it.
8/14/09	HPRP	Can landlords be reimbursed for court costs if it prevents a client's eviction?	No. Eligible legal expenses under HPRP include those incurred by the client only. Grantees may not use HPRP funds to reimburse landlords for any costs they may have incurred to begin the eviction process.
8/14/09	HPRP	Can grantees provide assistance to households in a rent-to-own or lease-in-place situation?	Yes, as long as the individual would be homeless "but for" the assistance, the full amount of the financial assistance is going towards rent or utilities (for example, no HPRP funds may be used for taxes or fees that may be associated with homeownership), a rent-to-own situation is permissible.
8/14/09	HPRP	Creating a homeless prevention hotline or 211 call center is an eligible activity under HPRP. What are the HMS reporting requirements for such activities?	An agency administering a homeless prevention hotline or 211 call center is not subject to the HMS data collection and reporting requirements due to the limited nature of the client contact. Instead, it is the programs receiving the referrals from the call centers and actually assisting clients with HPRP funds that are subject to the data collection and reporting requirements. If the agency operating the hotline provides additional HPRP-funded services

beyond intake and referral, they would be required to report client-level data per the HMS Data Standards.

8/14/09 HPRP	Not all households assessed under HPRP will be eligible for assistance. Is the time spent assessing such households an eligible expense?	Yes, the time spent assessing all households is an eligible expense under the Outreach and Engagement portion of Housing Relocation and Stabilization Services.
8/14/09 HPRP	In a situation where there are two unrelated individuals on a lease - one who is eligible, and one who is not - can a grantee assist the eligible individual?	If two unrelated individuals are joint parties to a lease, a grantee must consider total household income to determine eligibility (i.e., either the whole household is eligible for assistance, or the whole household is not).
8/14/09 HPRP	If a participant is receiving rental assistance through another program, can they also receive HPRP assistance?	HPRP assistance cannot be provided to eligible individuals or families for the same period of time and for the same cost types that are being provided through another federal, state, or local housing subsidy program. There are six cost types: rent payments, security deposits, utility deposits, utility payments, moving cost assistance, and hotel/motel vouchers. If a participant is receiving rental assistance under another program (either a full or partial subsidy), HPRP funds may not be used for rental assistance during that same time period. HUD expects the Public Housing Agency, or the agency administering the other housing subsidy program (e.g., HOME, HOPWA), to recalculate the tenant share of the rent payment when there has been a decrease in household income so that the housing remains affordable for the tenant. While a household receiving an ongoing housing subsidy cannot receive HPRP rental assistance, HPRP can be used to help the household pay for up to six months of arrears in cases where the household has fallen behind on its portion of the payment due to a time lag between the household's change in income and the recalculation of the tenant rent contribution. Note that the payment of arrears is eligible because it represents a different period of time - i.e., the arrears represents a back payment of the client portion, while the current rental assistance is a payment going forward. Finally, clients receiving rental assistance under another program may be eligible for other types of HPRP assistance, as long as they are not also receiving that "type" of assistance through another source. For example, a homeless veteran entering a HUD-VASH project may receive security deposit assistance with HPRP funds.
8/14/09 HPRP	If rental housing is not immediately available for move-in by eligible program participants, can subgrantees provide short or medium-term rental assistance payments for facility-based or project-based units while the households are assisted to locate and secure appropriate, affordable permanent housing?	Yes, payments for the tenant's portion of the rent in a project-based program would be eligible when rental housing is not available. However, grantees and subgrantees must comply with the Conflict of Interest requirements described in part VII.A. of the HPRP Notice. This means that HPRP funds may not be used to provide financial assistance or services in any units that are owned or operated by a subgrantee. In cases where a grantee or subgrantee wants to assist HPRP participants to reside in housing owned by the grantee or subgrantee, the grantee may seek a waiver from HUD to allow the use of this housing for HPRP participants. The grantee must submit a letter to the CPD Director of the local HUD office requesting a waiver for good cause, including a description of the benefit(s) to HPRP participants. If HUD approves the waiver, the grantee will be notified of additional information or requirements necessary to ensure the use of the housing is appropriate.
8/14/09 HPRP	Can a municipal grantee or subgrantee provide a client with utility assistance in cases where the city owns the utility company?	HPRP funds may be used to pay for utility assistance provided by a municipal utility company, provided the program participant meets all eligibility requirements, the assistance will prevent the participant's homelessness, and the municipal department is not treating HPRP participants differently than non-HPRP participants (e.g., with regard to fees or disconnections). A waiver is not required.
8/14/09 HPRP	Does a lease have to be in place in order to pay rental assistance? For example, could the funding go to pay for a tenant's rent at a relative or friend's house if they are not on the lease? (REVISED)	A lease must be in place and the program participant must be on the lease in order to use HPRP funds for the rent or security deposit. Therefore, assistance could not be provided to an individual renting from a friend or relative if a legal lease is not in place. In cases where an individual is renting a unit from a friend or relative and a legal lease is in place, agencies providing assistance must ensure that the arrangement is not in violation of the conflict of interest provisions outlined in the HPRP Notice (e.g., the rent charged and the terms of the lease must be the same for the participant as they are for other tenants renting comparable units).
8/14/09 HPRP	What are the on-site habitability inspection requirements, when do they apply, and who can conduct them? (REVISED)	The standards for housing unit inspections are the housing habitability standards described in Appendix C of the Notice. These standards apply only when a program participant is receiving financial assistance and moving into a new unit. They do NOT apply to persons receiving services only. They also do not apply to persons served with HPRP prevention assistance in a unit in which the program participants were already residing. Please see other questions for the lead-based paint assessment requirements, as they differ from the habitability standard inspection requirements. Note that the habitability standards are different from the Housing Quality Standards (HQS) used for other HUD programs. Because the HQS criteria are more stringent than the habitability standards, a grantee could use either standard. Also note that the HPRP Notice does not exempt units from having to be compliant with local housing codes. Therefore, if there are requirements that are in both the local housing code and the HPRP Notice, the grantee must comply with the more stringent of the two.

In contrast to HQS inspections, the habitability standards do not require a certified inspector. For example, HPRP project staff or staff from or hired by an agency of the grantee's local government can conduct the inspection. In addition, if a program participant is moving in to a unit and using another subsidy program that requires an inspection, staff from the other program may conduct the inspection, as long as they follow the minimum habitability standards required by HPRP. Inspections must be conducted upon initial occupancy and then on an annual basis for the term of HPRP assistance.

Please note that housing that is occupied by families with children under the age of 6 and that was constructed before 1978 – whether served with prevention or re-housing assistance - must also comply with Lead Based Paint inspection requirements, per the Lead Based Paint Poisoning Prevention Act. (Please see additional questions on lead-based paint inspection requirements.)

8/14/09 HPRP	Are costs related to the conduct of the inspections an eligible cost under the category of financial assistance? (REVISED)	Yes. The costs associated with conducting a habitability (or HQS) inspection are eligible under the financial assistance category. Similarly, the cost of conducting a Lead-Based Paint visual assessment is also an eligible financial assistance expense. Note that if peeling/deteriorated paint is detected during the visual assessment, costs associated with testing and repair/cleanup are not eligible under HPRP. However, once the deteriorated paint has been repaired, the cost of a Clearance Exam may be charged against the grant under the financial assistance category.
8/14/09 HPRP	How are inspections for compliance with Lead-Based Paint Requirements to be conducted? (REVISED)	Visual assessments can be conducted by a HUD-Certified Visual Assessor under HPRP, and must meet the requirements as outlined in the Lead-Based Paint Poisoning Prevention Act, as noted in Section VII.F of the Notice. A 20-minute online training course on conducting visual assessments can be found on HUD's website at http://www.hud.gov/offices/lead/training/visualassessment/h00101.htm .
8/14/09 HPRP	Under HPRP, may a program participant have a legal sublease? (REVISED)	HPRP financial assistance funds may only be spent on behalf of program participants where there is a legal lease that includes the participant's name on the document. A sublease is considered a legal lease. However, the grantee should be sure that the relationship between the participant/grantee/subgrantee and the landlord is not in violation of the conflict of interest provisions as stated in the HPRP Notice. For example, the sublease agreement should not be between relatives, friends, or other parties when there is a potential conflict of interest. That is, the grantee or subgrantee would have to document that the rent charged and the terms of the sublease are the same for the participant as they are for all other tenants renting comparable units from that landlord.
6/10/09 HPRP	Can HPRP funding help me with my mortgage payments? (REVISED)	No, HPRP is not a mortgage assistance program. Also, HPRP may not be used to pay for any taxes or fees related to homeownership.
6/10/09 HPRP	If a program participant initially received short-term rental assistance for 3 months and needs additional assistance, are they eligible to receive more funding through the HPRP? (REVISED)	Yes, after 3 months, if program participants receiving short-term rental assistance need additional financial assistance to remain housed, they must be re-evaluated for eligibility and appropriateness of services/assistance (ie, would the participant be homeless "but for" HPRP assistance). Participants may receive up to 15 additional months of medium-term rental assistance, for a total of 18 months. The 18 months need not be consecutive. As stated in the Notice, HUD is requiring grantees and subgrantees to certify eligibility at least once every 3 months for all program participants receiving medium-term rental assistance.
6/10/09 HPRP	Can the rental assistance be used to pay unpaid rental debt? (REVISED)	Yes, rental assistance may also be used to pay up to 6 months of rental arrears for eligible program participants facing eviction for non-payment of rent if the payment enables the program participant to remain in the housing unit for which the arrears are being paid. In cases where an eviction cannot be prevented, rental arrears can still be paid if it satisfies the grievance with the evicting landlord and thereby allows the participant to obtain different housing. Note that rental arrears can be paid on behalf of a person receiving a subsidy from another public program (e.g., Section 8) because it represents a different time period and cost type than the rental subsidy (ie, the arrears represents a back payment of the client portion, and the current rental assistance is a forward payment).
6/10/09 HPRP	The activities funded under the prevention and re-housing categories seem to be the same. How do I know which category under which to draw down funds in IDIS? Is the distinction between participants who are assisted to stay in their existing housing and those that are placed in new housing?	All persons assisted with HPRP funds—whether it is considered prevention or rapid re-housing assistance—may receive assistance from any of the HPRP eligible activities. The distinction is related to the population served. The difference is that persons receiving prevention assistance are housed at the time they begin receiving HPRP assistance, and persons receiving rapid re-housing assistance are homeless (according to HUD's definition) at the time they begin receiving assistance. If the person is at risk of homelessness and therefore does not meet the HUD definition of homelessness, the assistance would be classified as prevention. For example, an individual who has been in a hospital, prison, or other institution for less than 180 days and who was sleeping in an emergency shelter or on the streets immediately prior to entry into the institution meets the HUD definition and therefore would be served under the re-housing category. In contrast, a person who has been a resident of an institution for more than 180 days would still be eligible (assuming he/she meets other HPRP eligibility criteria), but in this case, the individual would be served under the prevention category.
6/10/09 HPRP	What assistance can be provided to homeowners? (REVISED)	While mortgage assistance is not eligible under HPRP, homeowners who become homeless are eligible for all HPRP activities, provided they meet the other eligibility criteria

as listed in the Notice. Homeowners who are housed but are at risk of becoming homeless and meet all other eligibility criteria (consultation with a case manager, below 50% of AMI, and at risk of becoming homeless with no housing options and lack financial resources/support network) may be assisted with the following: utility payments (including arrears but excluding deposits) and housing relocation and stabilization services (such as credit repair, case management, and housing search/placement but excluding legal services related to a mortgage). In addition, persons who are foreclosed upon, are going to become homeless, and meet all of the eligibility criteria may be eligible to receive homelessness prevention assistance—for example, rental assistance in a rental unit, moving cost assistance, etc.

6/10/09 HPRP	On page 16, the Notice states, "HPRP funds may be used for reasonable and appropriate motel and hotel vouchers for up to 30 days if no appropriate shelter beds are available and subsequent rental housing has been identified but is not immediately available for move-in by the program participants." Is this to be taken literally? Can a hotel/motel voucher be used only if a unit has been identified for that participant/household?	Yes, as stated in the Notice, a hotel/motel voucher can only be used when a unit has been identified and no shelter beds are available. Because it could take a few weeks to locate suitable rental housing, it would be advisable for grantees to try to identify an alternate source of funding for emergency housing to assist households in-between the time of program entry and the identification of housing if the community's shelters are at capacity.
6/10/09 HPRP	What type of documentation does HUD require related to the housing habitability inspection? (REVISED)	Grantees and subgrantees are responsible for documenting that each unit meets the habitability standards as described in Appendix C of the Notice. However, HUD is not requiring a particular form of documentation. Sample tools/forms are being posted on the HRE at http://hudhre.info/index.cfm?do=viewResourcesByTopic&topicid=78 as they become available.
6/10/09 HPRP	What are the lead-based paint inspection requirements? (REVISED)	<p>The Lead-Based Paint requirements are more stringent than the habitability standards, and they apply to all housing in which families assisted with HPRP funds will reside, whether they are assisted with homelessness prevention or rapid re-housing. Specifically, the regulations apply to the unit and to common areas servicing the unit when HPRP assistance is provided to a unit constructed before 1978 in which a child under the age of 6 will be residing, unless it meets one of the following criteria: a) it is a zero-bedroom or SRO-sized unit, b) it is housing for the elderly and there are no children under the age of 6, c) a lead-based paint inspection has been conducted in accordance with HUD regulations and found not to have lead-based paint, d) the property has had all lead-based paint identified and removed in accordance with HUD regulations or e) it meets any of the other exemptions described in 24 CFR part 35.115(a).</p> <p>An initial visual assessment and periodic inspections are required for as long as HPRP funds are being used to assist the family in the unit. Both must meet HUD's standards described in the applicable regulations. In addition, the unit must be inspected again if a new family assisted with HPRP funds moves in, and the clock for periodic inspections is reset. Finally, the owner must provide a notice to occupants if an evaluation and hazard reduction activities have taken place, in accordance with 24 CFR part 35.125.</p> <p>Please carefully read the regulations that implement the Lead-Based Paint Poisoning Prevention Act, at 24 CFR part 35, subparts A, B, M, and R.</p>
6/10/09 HPRP	In the Notice, HUD states that administrative costs includes training "case managers who will serve program participants, as long as this training is directly related to learning about HPRP." Does such training include case management skills to provide services in rapid re-housing programs or training in other skills critical to homelessness prevention, such as the skills necessary to connect HPRP participants to mainstream programs offering employment services? (REVISED)	General training for case manager to enhance their ability to provide services, counseling, or linkages with other programs – even Recovery Act programs – is NOT an eligible cost. These are considered general skills that a case manager would need in order to do their job, regardless of HPRP. HUD's intent is to allow persons providing services or administering the local HPRP program to attend training provided by HUD, the grantee, an authorized HPRP technical assistance provider or other HPRP training held in partnership with HUD in order to learn about HPRP eligible activities, eligible participants, and other requirements, and intent of HPRP. Training on the specific policies and procedures of a grantee's HPRP program may also be an eligible expense, but general training on rapid re-housing or homelessness prevention programs is not.
6/10/09 HPRP	If an individual has severe and persistent physical or mental health issues that would make them a good fit for a permanent supportive housing program (like Shelter Plus Care-funded housing), but there are no available openings in such programs, can the person access HPRP funds while they sit on the waiting list? (REVISED)	The intent of the legislation is to assist persons who need temporary assistance to obtain or remain in housing, and hopefully be able to sustain housing, subsidized or unsubsidized, once HPRP ends. That said, persons who are disabled and eligible for permanent supportive housing are eligible to receive tenant-based rental assistance available through HPRP. Therefore, persons on a permanent supportive housing program waiting list may be served with HPRP assistance until a permanent supported housing unit is available, provided the permanent supportive housing unit will be available within 18 months, does not violate conflict of interest leasing requirements, the services provided are limited to the HPRP Housing Relocation and Stabilization services described in the Notice, and the assessment reveals that the person is likely to be able to maintain the HPRP housing until the permanent supportive housing unit is available.
6/10/09 HPRP	Can HPRP funds be used for shelters? (REVISED)	No. HPRP funds may not be used for shelter operations. However, as stated on page 16 of the Notice, "HPRP funds may be used for reasonable and appropriate motel and hotel vouchers for up to 30 days if no appropriate shelter beds are available and subsequent rental housing has been identified but is not immediately available for move-in by the program participants." This is the only circumstance that HPRP funds can be used to pay

for emergency housing costs – i.e., when permanent housing has been identified but it not yet available, and when shelter beds in the community are full.

6/10/09 HPRP	Under HPRP, if homeless families are re-housed and receive short or medium-term rental assistance, will this make them ineligible for a CoC-funded transitional or permanent supportive housing program? In other words, does participation in HPRP eliminate an individual's homeless status? (REVISED)	HPRP assistance is temporary. Persons who were homeless before receiving HPRP assistance (Rapid Re-housing assistance) do not lose their homeless status and remain eligible for assistance under other CoC-funded programs. However, chronically homeless persons that receive HPRP assistance would no longer be considered chronically homeless (making them ineligible for Samaritan projects).
6/10/09 HPRP	As stated on page 14 of the Notice, HUD is requiring grantees and subgrantees to reassess household and certify eligibility at least once every 3 months. What happens if a household is determined to be at 51 percent Area Median Income (AMI) at the point of recertification? Is there a grace period?	Unfortunately, there is no grace period under HPRP. If a household is at 51 percent of AMI at the time it is reassessed, that household is no longer eligible for HPRP assistance. This underscores the importance of providing ongoing case management for program participants receiving rental assistance in order to transition them to independence. Where possible, grantees may wish to identify an alternate (more flexible) funding source to provide continued support to households that have increased their income but remain precariously housed.
6/10/09 HPRP	Appendix C of the HPRP Notice outlines the habitability standards for HPRP. Must the local housing code be used if it meets a higher standard than the identified requirements in Appendix C? Several sections indicate that grantees may use either standard.	The grantee or subgrantee is responsible for ensuring that a housing inspection is conducted, to ensure that units assisted with HPRP funds meet the housing habitability standards described in Appendix C of the Notice. Local housing codes also apply to the units, but the landlord should have a Certificate of Occupancy or other documentation that ensures that the building complies with local requirements. The HPRP Notice does not exempt units from having to be compliant with local housing codes. Therefore, if there are requirements that are in both the local housing code and the HPRP Notice, the grantee must comply with the more stringent of the two.
6/10/09 HPRP	What types of utility expenses are eligible under HPRP?	Assuming that the participant meets all HPRP eligibility requirements, utility assistance related to housing may be provided. Utilities eligible for assistance are: heat, electricity, water, sewer and garbage collection. Telephone and cable services are not eligible.
6/10/09 HPRP	Is assisting homeless or those at risk of becoming homeless to obtain expungements and/or pardons of their criminal records an eligible activity under HPRP? Is re-entry advocacy to help ex-offenders get jobs and/or social services an eligible activity?	Assisting homeless or soon-to-be-homeless persons in obtaining expungements and/or pardons of their criminal records is not an eligible activity under HPRP. Furthermore, advocacy is not an eligible expense, nor is helping persons get jobs. All eligible HPRP activities are directly related to housing. Helping eligible program participants to obtain other Recovery Act or mainstream resources is an eligible Housing Relocation and Stabilization Service.
6/10/09 HPRP	Can HPRP funds be used as match for SHP?	HPRP may be used to match activities under SHP that are also eligible under HPRP. This would include services related to rapid re-housing of homeless persons, for example. It would not include operating costs associated with a transitional housing facility since operating a transitional housing facility is not eligible under HPRP.
6/10/09 HPRP	Are set-asides allowed for any specific population who may be, at some point, at risk of losing their jobs?	No. Grantees may not set aside funds for a specific group of people who are not yet eligible for HPRP funds. HPRP eligibility must be determined on a case-by-case basis, upon the required initial visit with a case manager or other professional who is qualified to determine eligibility for the program. This is why unemployment is not the only criteria that a grantee or subgrantee may look at for participation in HPRP - a program participant must meet all of the eligibility criteria described in section IV.A.2. of the HPRP Notice. There is no way for the grantee to know, without the careful, initial assessment by a case manager, which of the workers that may be laid off would become homeless without HPRP assistance, so a "set-aside" is not allowed.
6/10/09 HPRP	Can grantees provide housing stabilization supports to households that are relocated from shelter to unsubsidized housing, even if HPRP rent assistance is not used in that re-housing activity?	Eligible program participants who are rapidly re-housed from shelter to unsubsidized housing may receive Housing Relocation and Stabilization Services without also receiving HPRP rental assistance, as long as they meet all of the eligibility criteria and would be homeless without the HPRP services provided.
6/10/09 HPRP	Under HPRP, is there an age restriction on persons receiving assistance?	No, there are no age restrictions. However, just as with McKinney-Vento programs, HPRP funds may not be used to serve youth who are wards of the state.
6/10/09 HPRP	Could HPRP funds be used to pay continued room and board costs of foster care for youth who would otherwise have to leave foster care at age 18? In other words, could these funds be used to extend the foster care placement beyond age 18 when Title IV-E is no longer available as a funding source?	HPRP funds can be used to prevent homelessness for youth aging out of foster care, as long as they meet the minimum requirements defined in section D.2. of the Notice, and as long as the program participant's name is on the lease in the assisted unit. Continued room and board costs in the youth's foster home would not be eligible, but moving the youth to a unit of his/her own would enable him/her to be eligible as long as he/she meets all of the eligibility criteria. As described in section IV.C, persons who are being imminently discharged into homelessness from publicly funded institutions are eligible to receive financial assistance or services through HPRP and is considered prevention assistance. However, developing or updating system discharge plans and policies is not an eligible expense.

6/10/09 HPRP	What kinds of legal assistance are eligible activities under HPRP?	Legal services are limited to the activities described in the HPRP Notice. Eligible legal services may include assisting program participants with legal advice and representation in administrative or court proceedings related to tenant/landlord matters or housing issues. Legal assistance related to mortgages is not eligible.
6/10/09 HPRP	Can funds be used to house persons in an emergency shelter on a short term basis?	No. HPRP funds may not be used for shelter operations. However, as stated on page 16 of the Notice, "HPRP funds may be used for reasonable and appropriate motel and hotel vouchers for up to 30 days if no appropriate shelter beds are available and subsequent rental housing has been identified but is not immediately available for move-in by the program participants." This is the only circumstance that HPRP funds can be used to pay for emergency housing costs – i.e., when permanent housing has been identified but it not yet available, and when shelter beds in the community are full.
6/10/09 HPRP	Can HPRP administrative funds be used to fund general CoC staff positions?	HPRP administrative funds may be used for the administration of HPRP grants only. General CoC operations are not eligible costs under HPRP.
6/10/09 HPRP	Under HPRP, is case management considered an eligible cost under the administrative category?	Case management expenses must be charged under the Housing Stabilization and Relocation Services category and are not eligible under the Administrative cost category.
6/10/09 HPRP	In the HPRP Notice, under Ineligible and Prohibited Activities, it states that transportation and travel costs are ineligible. Does this refer to the transportation/travel expenses of case managers, or does it refer to the client?	This prohibition on transportation and travel costs refers to program participants. Case managers may travel if needed to serve eligible HPRP program participants.
6/10/09 HPRP	Under HPRP, is there a minimum or maximum cost that can be expended on case management/staff?	As explained in the HPRP Notice, HUD has not established minimum or maximum funding amounts for any HPRP activity category, except for administrative funds which are capped at 5% of the HPRP grant.
6/10/09 HPRP	Are there education or qualification requirements for case managers under HPRP?	HUD has not set any specific minimum criteria for case management staff that conduct the required initial assessment of program participants. However, HUD strongly encourages grantees to set minimum qualifications or credentials for these staff persons since they are the ones who will determine participant eligibility and therefore the program's compliance with the HPRP Notice.
6/10/09 HPRP	May HPRP funds be used to make buildings more energy efficient? Can they be used for lead-based paint remediation?	HPRP funds may not be used for rehabilitation. However, there are many other programs being funded by HUD, DOE, EPA, and other departments/agencies that would fund these types of improvements. Please see www.recovery.gov for more information.
6/10/09 HPRP	Under HPRP, are people living doubled-up with friends or family considered to be at risk of homelessness? Are they eligible to receive HPRP funds?	Families or individuals who are precariously housed may be eligible for HPRP prevention assistance if it is determined that they would be "homeless but for this assistance" and they meet all other HPRP eligibility criteria, as specified in the Notice.
6/10/09 HPRP	Is working with a housing counseling agency an eligible activity under HPRP?	Housing Counseling agencies largely work with homeowners facing foreclosure. As mortgage assistance is not an eligible activity under HPRP, homeowners seeking this type of service should be referred to the appropriate Housing Counseling programs within your community. A housing counseling agency may be a subgrantee of HPRP funds if the scope of services include HPRP-eligible activities such as rental assistance and housing search and placement for HPRP-eligible participants.
5/20/09 HPRP	Is it true that administrative costs may not be used for staff engaged in the general administration of the program (e.g., bookkeeping costs)? (REVISED)	HUD's policy for eligible administrative activities limits the costs to the items listed in Section IV.A.4 of the Notice because administrative funds are statutorily limited to 5% of the total grant. Bookkeeping costs may be charged under administration, financial assistance, or housing relocation and stabilization services depending on the type of activity being conducted by the bookkeeper. For example, costs for a bookkeeper to pay for rental assistance, security deposits, etc., are allowable under the category of Financial Assistance because it is directly related to the delivery of financial assistance. The costs for the bookkeeper to pay the for salaries of case managers is a payroll function and, as such, is an administrative cost. Therefore, grantees need to break out the bookkeeper's time based on the activities performed (i.e., the delivery of direct service activities or administrative activities).
5/8/09 HPRP	Can HPRP funds be used to purchase and implement a Housing Search/ Locator System? Would this activity be funded under Data Collection and Evaluation or Housing Relocation and Stabilization?	HPRP funds under the Data Collection and Evaluation activity may be used to increase the scope of the HMIS to include a web-based housing search/housing locator module in the CoC's HMIS. This would include purchasing a module available through the CoC's HMIS software product or, when the CoCs HMIS software product does not have a housing search/housing locator module available, purchasing a "customizable off-the-shelf" (COTS) product. However, if a COTS product is purchased, it must interface with the HMIS. Data Collection and Evaluation funds may not be used to purchase and implement a stand-alone housing locator/housing search product that is not integrated with the HMIS. The costs associated with implementing the housing locator/housing search functionality, including staff time for data entry, user training, and software licensing and support, are also eligible under the Data Collection and Evaluation activity, but the research conducted to

identify landlords and/or properties for populating the housing locator is eligible under the Outreach and Engagement activity of Housing Relocation and Stabilization Services.

Please note that HPRP Administrative funds may not be used to purchase or implement housing search/housing locator functionality since the use of Administrative funds is limited to costs associated with reporting, audits, and grant management.

5/8/09 HPRP	Can HPRP funds be used to assist individuals/families in transitional housing?	HPRP funds may not be used to move an individual or family into a transitional housing program, nor may it be used to assist persons residing in a transitional housing program. However, HPRP funds may be used to assist persons that are graduating from or timing out of a transitional housing program to obtain permanent housing.
5/8/09 HPRP	Can HPRP funds awarded to an entitlement city or county be used outside of the city or county's jurisdiction?	Grantees may provide rental assistance or services to eligible program participants who are residing or would like to reside outside their jurisdiction. They may also fund subgrantees that serve persons outside of the jurisdiction, subgrantees that are located outside of the jurisdiction, and subgrantees that serve multiple jurisdictions. A grantee may establish more stringent requirements, such as requiring that HPRP funds be spent within the jurisdiction or establishing a residency requirement, but HUD is not setting these requirements.
4/24/09 HPRP	What costs are eligible pre-award costs? Must these be pre-approved? Can housing inspections be considered a pre-award cost? (REVISED)	Grantees may incur eligible pre-award costs, which are limited to administrative costs. These costs must be directly related to preparing the application for submission to HUD, for the period of time between the publication of the Notice on March 19, 2009 through the execution of the grant agreement between HUD and the grantee. This includes, but is not limited to, staff costs for preparing the substantial amendment, other costs related to the public comment process, hiring a consultant for preparation of the Substantial Amendment, and attending HUD-sponsored HPRP meetings and trainings. Note that costs related to the provision of financial assistance, including housing inspections, and housing relocation and stabilization services are not considered administrative costs, and therefore, are not eligible pre-award costs.
4/24/09 HPRP	The guidance indicates that up to 6 months of utility arrears can be paid under the eligible activities within financial assistance. Is the eligible amount the actual charges accrued during the most recent 6 months, or any timeframe, up to a maximum of 6 months of total expenses?	Utility arrears may be paid for any 6 months, as long as the program participant meets all eligibility criteria, and as long as the payment of the arrears allows the program participant to either remain in the housing or obtain new housing. The maximum amount that can be paid is the total arrears accrued during the 6 month period.
4/24/09 HPRP	Is the amount of rental assistance provided under HPRP based on the HOME TBRA program, where the household must pay 30% of its income for rent, or can their entire rent cost be subsidized?	HUD is providing grantees with a great deal of flexibility in determining their local programs and adding any restrictions. The grantee may decide whether to subsidize the full rent of a program participant or only a portion, depending on local priorities and need.
4/24/09 HPRP	Is the grantee required to share administrative funds with subgrantees? If so, are there guidelines for determining what constitutes a "reasonable and appropriate amount"?	Yes, grantees are required to share administrative funds with their subgrantees. HUD has not defined "reasonable share," however, grantees should consider their fixed and variable costs related to conducting the eligible administrative functions when calculating the amount to be retained by the grantee and the amount to be shared with subgrantees.
4/3/09 HPRP	Will citizens returning to the community following discharge from a state correctional system (who meet all stated eligibility requirements) be eligible for receipt of short-term housing assistance?	Yes, persons who are discharged from publicly funded institutions and who meet all HPRP eligibility requirements may receive financial assistance and/or services under HPRP.
4/3/09 HPRP	Are there any notification requirements to HUD if jurisdictions wish to exercise the option of incurring pre-award administrative expenses?	There are no notification requirements. Grantees, however, must make sure that the pre-award costs are eligible and, of course, maintain documentation of all expenses. If a grantee has questions about any costs, it should contact its local HUD field office to verify whether they are eligible.
4/3/09 HPRP	Can HPRP be used to create a regional or state-wide prevention hotline? If yes, under what activity could the costs be incurred?	Yes, a regional or state-wide prevention hotline would be eligible as an outreach and engagement activity under Housing Relocation and Stabilization Services.
4/3/09 HPRP	Where would assisting clients to access mainstream benefits/entitlements (e.g., SSI/SSDI) fit under HPRP? Would they be considered a case management service and funded as such?	Yes, assisting a program participant to access public benefits would be considered case management. As stated in the HPRP Notice, "HPRP case management funds may be used for activities for the arrangement, coordination, monitoring, and delivery of services related to meeting the housing needs of program participants and helping them obtain housing stability." This activity would be considered an arrangement and coordination of public benefits.
3/20/09 HPRP	Does a program participant need to have a child or children in the household to be eligible to receive assistance?	No, a program participant can be an individual or a household with or without children.

3/20/09 HPRP	What are the eligible categories for activities under the HPRP?	There are four categories of activities eligible as HPRP expenditures: financial assistance, housing relocation and stabilization services, data collection and evaluation, and administrative costs.
3/20/09 HPRP	Does HPRP assistance provide long-term assistance?	The maximum amount of rental assistance that may be provided under HPRP is 18 months. The purpose of HPRP short- and medium-term rental assistance is to help eligible program participants to quickly obtain and/or sustain stable housing. It is not intended to provide long-term support for program participants, nor will it be able to address all of the financial and supportive services needs that affect housing stability. In fact, many prevention and rapid re-housing program models include short- or medium-term rental assistance and services for households who have barriers to housing, but who are likely to sustain housing after the subsidy ends. Therefore, organizations providing assistance should use a process to assess, for all potential program participants, their level of service need, other resources available to them, and the appropriateness of their participation in the rapid re-housing assistance portion of HPRP. Program participants who require longer-term housing assistance and services should be directed to programs that can provide the requisite services and financial assistance.
3/20/09 HPRP	What are the eligible financial assistance expenses?	Financial assistance is limited to the following activities: short-term rental assistance, medium-term rental assistance, security deposits, utility deposits, utility payments, moving cost assistance, and motel and hotel vouchers.
3/20/09 HPRP	What is considered short-term rental assistance and what is considered medium-term rental assistance?	Short-term rental assistance may not exceed rental costs accrued over a period of 3 months. Medium-term rental assistance may not exceed actual rental costs accrued over a period of 4 to 18 months.
3/20/09 HPRP	As a grantee, can I establish more strict requirements than HUD has established?	Yes. HUD is providing grantees with discretion to establish requirements that further target community needs. Grantees may elect to implement more stringent targeting and/or eligibility requirements as long as all program participants meet the minimum eligibility criteria and the grantees comply with all local and federal requirements. For example, grantees may set limits on the amount of assistance any household may receive, may pay for only a portion of a program participant's rent, may require participants be at 30% or less of Area Median Income (AMI) or may require participants have additional risk factors.
3/20/09 HPRP	Will the condition of a unit or building impact a household's ultimate eligibility to receive financial assistance?	<p>For persons residing in buildings that have been condemned or otherwise not suitable for human habitation, HPRP funds may be used to relocate them to more suitable housing. The HPRP assistance may include financial assistance and housing relocation and stabilization services. The unit into which the program participants move must meet habitability standards as defined Appendix C of the Notice.</p> <p>Grantees and subgrantees are encouraged to consider local and state building and housing codes when providing financial assistance to persons to allow them to remain in their housing.</p> <p>Keep in mind that HPRP funds may not be used for the construction or rehabilitation of a building.</p>
3/20/09 HPRP	How is HPRP different from the Rapid Re-housing (RRH) demonstration program?	<p>UNDER THE RRH PROGRAM:</p> <ul style="list-style-type: none"> - <i>Eligible Participants:</i> Households with dependent children (families) - <i>Rental Subsidy Period:</i> 3-6 months OR 12-15 months - <i>Centralized Intake Process:</i> Required - <i>Community-wide Screening Tool:</i> Required <p>UNDER THE HPRP PROGRAM:</p> <ul style="list-style-type: none"> - <i>Eligible Participants:</i> Individuals or Families (households with dependent children) - <i>Rental Subsidy Period:</i> Any # of months up to 18 months - <i>Centralized Intake Process:</i> Optional (HUD Recommends) - <i>Community-wide Screening Tool:</i> Optional (HUD Recommends)

Topic: Eligible Grantees and Subgrantees

Date	Program/System	Question	Answer
9/11/09	HPRP	Can a Metropolitan City or Urban County HPRP grantee subgrant funds to Public Housing Agencies, Housing and Redevelopment Authorities, and other Special Purpose Governmental Organizations?	<p>Metropolitan Cities and Urban Counties may subgrant to private non-profit organizations or other units of general purpose local government. In the vast majority of cases, a city or county PHA, HRA, or other special purpose public agency is not recognized as a unit of general purpose local government. HUD relies on the classifications in the Census of Governments in determining whether an entity is a unit of general purpose local government. For information on these classifications, see "Structure of Governments" at: http://www.census.gov/govs/go/index.html.</p> <p>The following are four ways that a PHA, HRA, or other special purpose public agency may qualify to conduct HPRP activities:</p>

a. If the PHA, HRA, or other entity is a department of a unit of general purpose local government pursuant to state law, then it may carry out HPRP activities for the city or county government and no subgrant is required. In this case, the unit of general local government, not the PHA, would be the grantee (or subgrantee, if using funds subgranted from another local government grantee). The majority of PHAs do not meet this requirement. If the special purpose public entity does meet this qualification, then the HPRP grantee must notify the CPD Director in writing that the PHA or other special purpose entity is a department of the unit of general purpose local government, including the statutory citation and name(s) of the PHA(s) or other special purpose entity.

b. If any organization, including a PHA, or HRA, has a status of a 501(c)(3) private non-profit organization, it qualifies as an eligible subgrantee.

c. If the grantee submits a request for a waiver of the prohibition on subgranting HPRP funds to a PHA, or HRA or other special purpose entity and HUD approves this waiver request, the metropolitan city or urban county grantee may subgrant to a PHA, HRA, or other special purpose local government for the organization to carry out eligible activities or administer the program. The grantee must submit a letter to the CPD Director requesting a waiver for good cause, including the following information:

- Description of how inclusion of the PHA, HRA, or other organization as a subgrantee is in the best interest of HPRP participants, including any benefit(s) to the participants.
- Demonstrate the PHA, HRA, or other organization's expertise serving homeless persons, and
- Explanation of selection process for HPRP participants.

d. A metropolitan city or urban county grantee that adheres to the requirements of 24 CFR § 85.36 may procure the services of any entity, including a PHA or HRA, to carry out the eligible activities under HPRP. However, the procurement rules are based on free and open competition for the grantee/subgrantee to get the best deal for its grant dollars in obtaining goods and services from a qualified organization. The noncompetitive proposal method (procurement through solicitation of a proposal from only one source, or after solicitation of a number sources, competition is determined inadequate) is only permitted by 24 CFR § 85.36(d)(4) if other methods of procurement are infeasible and one of the specified circumstances applies.

9/11/09 HPRP

Can a State HPRP grantee subgrant funds to Public Housing Agencies, Housing and Redevelopment Authorities, and other Special Purpose Governmental Organizations?

State HPRP grantees may only subgrant to private non-profit organizations and units of general purpose local government. In the vast majority of cases, the State cannot subgrant its HPRP funds to a PHA or HRA because these are not units of general purpose local government. HUD relies on the classifications in the Census of Governments in determining whether an entity is a unit of general purpose local government. For information on these classifications, see "Structure of Governments" at <http://www.census.gov/govs/go/index.html>.

Please note the following:

a. HUD cannot waive this requirement because it is statutory. The provisions under which HPRP was authorized in the American Recovery and Reinvestment Act of 2009, Public Law 111-5, specify that funding for HPRP "be allocated to eligible grantees (as defined and designated in sections 411 and 412 of subtitle B of title IV of the McKinney-Vento Homeless Assistance Act (the 'Act')) pursuant to the formula authorized by section 413 of the Act." Section 413 of the Act states that "[t]he Secretary [of HUD] shall allocate assistance . . . to . . . States (for distribution to local governments and private nonprofit organizations in the States)." 42 U.S.C. 11373. Section 411 of the Act defines the term "local government" as a "unit of general purpose local government." 42 U.S.C. 11371. It is this parenthetical that sets the requirement, and since it is statutory, it cannot be waived.

b. A state subgrantee may not further subgrant state HPRP funds to a PHA, HRA, or other special purpose local government agency that is not a unit of general purpose local government.

c. A state subgrantee that adheres to the requirements of 24 CFR § 85.36 may procure the services of any entity, including a PHA, HRA, to carry out the eligible activities under HPRP. However, the procurement rules are based on free and open competition for the grantee/subgrantee to get the best deal for its grant dollars in obtaining goods and services from a qualified organization. The noncompetitive proposal method (procurement through solicitation of a proposal from only one source, or after solicitation of a number sources, competition is determined inadequate) is only permitted by 24 CFR § 85.36(d)(4) if other methods of procurement are infeasible and one of the specified circumstances applies.

8/14/09 HPRP

In Section III, Part A, the HPRP Notice indicates that state grantees may subgrant directly to private nonprofit organizations "if the local government for the locality in which the program is located certifies that it approves of the program." When does this rule apply, and what does certification entail? (REVISED)

The only instance that local certification is required is when state grantee is allocating HPRP funds to non-profit organizations located in an area outside of the state's Consolidated Plan jurisdiction. That is, when a state subgrants HPRP funds to a non-profit organization located in an entitlement area covered by another Consolidated Plans, the local government for the area in which the office of the non-profit organization is physically located must certify that it approves of the program. If funds are being provided to a non-profit organization in an area covered by the state's Consolidated Plan, certification is not required.

To obtain certification by the local unit of government, grantees should use a form similar to the one used by state grantees under the Emergency Shelter Grants (ESG) program. This form is posted on the HRE at <http://hudhre.info/documents/HPRPAttachmentID.doc>

6/10/09 HPRP	Where can a list of "entitlement communities" or HPRP grantees be found?	To find this information, please refer to the HPRP Eligible Grantees with CDBG Contact Information document which is posted on the HUD HRE website at http://www.hudhre.info/documents/HPRPContactInfoJul09.pdf .
6/10/09 HPRP	Can a State use a combination process and award HPRP funds directly to units of general local government (for example, counties) and directly to a regional or statewide non-profit?	HUD is providing all grantees, including state grantees, with the discretion to subgrant to local nonprofits or local governments to carry out HPRP activities (see section III.C of the HPRP Notice). HUD also provides discretion for grantees to develop a subgrantee selection process, provided it is fair and reasonable.
6/10/09 HPRP	If a city is not a grantee, must it apply to the State grantee or, if the county in which the city is located is an HPRP grantee, must the city apply to the county?	The county, as a grantee, has the discretion to distribute HPRP funds to the cities within its jurisdiction as subgrantees. The city is also eligible to receive funds from the State as a subgrantee, at the discretion of the State grantee. Further, cities and counties may subgrant HPRP funds to other local governments.
6/10/09 HPRP	Can a grantee or subgrantee procure services from a for-profit organization to implement the local HPRP program? Services could include particular aspects related to program administration (e.g., inspections), technical assistance, etc.	Grantees and sub-grantees can procure services from for-profit organizations. Grantees and sub-grantees must follow the applicable federal procurement rules: -24 CFR Part 85, applicable to States and local governments -OMB Circular A-110 as implemented through 24 CFR Part 84, applicable to nonprofits. Additionally, most states and many local governments have laws and regulations regarding procurement. Each grantee and sub-grantee receiving HPRP funds should aware of the state and/or local laws that may affect procurement policies.
4/24/09 HPRP	Who are eligible grantees for HPRP funding? (REVISED)	States, U.S. territories, metropolitan cities, or urban counties are eligible grantees for HPRP funding. Grantees may subgrant to local units of government, which may include metropolitan cities and urban counties that receive HPRP funds directly from HUD, and/or to private nonprofit organizations. For state subgrantees, the local government in the locality in which the organization will operate the program must certify that it approves of the program.
4/24/09 HPRP	Can non-urban areas apply for funds through this application? (REVISED)	Appendix A of the HPRP Notice provides a list of eligible grantees that can apply and receive HPRP funding directly from HUD through the Consolidated Plan Substantial Amendment process. Local governments that are not eligible grantees and nonprofit organizations must contact the local or state grantee for information about becoming a subgrantee. It is up to each grantee to determine the appropriate eligibility and application requirements for their allocation. Contact your local and/or state grantee for HPRP application information.
4/24/09 HPRP	Are tribal units of government eligible recipients of funds in a subgrantee capacity from the State?	No, tribal governments are not eligible subgrantees. State HPRP grantees must subgrant funds to either units of general local government in the state -- which may include metropolitan cities and urban counties that receive grants amounts directly from HUD -- or private nonprofit organizations.
4/3/09 HPRP	Can a State award HPRP funds in an area that receives its own HPRP allocation, or is the State restricted to distributing funds in non-entitlement areas?	Under HPRP, a state may subgrant with areas that receive a direct allocation from HUD.
4/3/09 HPRP	Are non-profits eligible to apply for funds directly from HUD?	Nonprofit organizations are not eligible to submit an application for HPRP funding directly to HUD. States, urban counties, metropolitan cities, and U.S. territories are eligible applicants under HPRP. Once these eligible applicants become grantees, they may subgrant with a private nonprofit organization to carry out HPRP activities. Please contact the grantee for further eligibility criteria and application process.
3/20/09 HPRP	Who can receive HPRP assistance?	There are two populations of persons facing housing instability that are eligible to receive funding under the HPRP: 1) individuals and families who are currently in housing but are at risk of becoming homeless and need temporary rent or utility assistance to prevent them from becoming homeless or assistance to move to another unit (prevention), and 2) individuals and families who are experiencing homelessness (residing in emergency or transitional shelters or on the street) and need temporary assistance in order to obtain housing and retain it (rapid re-housing). The eligibility criteria are as follows: Homeless individuals and families, and individuals and families at risk of becoming homeless, must meet the following three criteria in order to receive HPRP financial assistance or services: - Household must be at or below 50 percent of Area Median Income (AMI) - Household must meet both of the following circumstances: (1) no appropriate subsequent housing options have been identified; AND (2) the household lacks the financial resources and support networks needed to obtain immediate housing or remain in its existing housing.

- Any individual or family receiving rental assistance must have at least an initial consultation with a case manager to determine need.

Topic: Grant Allocations and Application Process

Date	Program/System	Question	Answer
6/10/09	HPRP	Will subgrantees (cities, counties and non-profit organizations) be required to register with the Central Contractor Registry (CCR) and obtain a DUNS number?	As stated in Section IV (E) (8) of the HPRP Notice, "All grantees and subgrantees are required to register with Dun and Bradstreet to obtain a DUNS number, if they have not already done so, and complete or renew their registration with the Central Contractor Registration (CCR)." For more information see 73 FR 23483, April 30, 2008 or go to www.dnb.com . The Recovery Act requires that all grantees be verified through the CCR, therefore HUD will not release an HPRP grant agreement for a grantee until their registration is verified. Specific questions or troubleshooting regarding the status of a CCR registration can be referred to Loyd Lamois in HUD's Office of Administration at Loyd.LaMois@hud.gov .
6/10/09	HPRP	When will grantees release their requests for subgrantee applications to community organizations?	Grantees were required to submit their Substantial Amendments to HUD by May 18, 2009 and are required to obligate funds to subgrantees by September 30, 2009. In that amendment, grantees had to explain the process they will use to distribute funds. Grantees are not required to use a competitive process (e.g., they could use a formula or some other methodology). However, for those grantees allocating funds through a competition, it is reasonable to expect that an RFP would be released between June and September. Check with your grantee to obtain more specific, local information.
5/14/09	HPRP	With regard to Form SF-424, what is the Catalog of Federal Domestic Assistance (CDFA) number and CDFA title? (REVISED)	The CFDA number and title is 14.257: Homelessness Prevention and Rapid Re-Housing Program (item 11). Please note that there is no Applicant Identifier (item 4), Federal Entity Identifier (item 5a), Federal Award Identifier (item 5b), Funding Opportunity Number (item 12), or Competition Identification Number (item 13). All of these items can be left blank.
5/14/09	HPRP	Where should the substantial amendment be sent?	As stated in the Notice under Section IV (E) – Application Requirements #4, each grantee must provide HUD with two hard copies of the completed substantial amendment. The original should be sent to HUD Headquarters in Washington, DC: U.S. Department of Housing and Urban Development, Office of Special Needs Assistance Programs, Robert C. Weaver Building, 451 Seventh Street, SW, Room 7262, Washington, DC 20410, Attention: Homelessness Prevention and Rapid Re-Housing Program. The copy should be send to the grantee's Field Office. For Field Office contact information, please visit HUD's website at http://www.hud.gov/local/ Please note that Federal Express will not deliver packages to Federal buildings without a contact name. Please address the original to Kevin Turner in Washington (phone 202-402-5060). Please address the copy to your Field Office CPD representative.
5/8/09	HPRP	What process would an eligible municipality use to allow another eligible entity to carry out HPRP activities cooperatively, combining both jurisdictions' funds?	A metropolitan city or urban county that receives a grant allocation directly from HUD may subgrant to another local government. By subgranting their allocation, the grantee maintains responsibility for oversight and all other grantee responsibilities that are required when they subgrant funds to another entity. Please note that this is different from carrying out HPRP activities cooperatively through a "joint agreement" – joint agreements are not allowed under HPRP. Therefore, the HPRP grantee must submit a substantial amendment, and then complete a subgrant agreement with the other local government.
4/24/09	HPRP	Where is the application and what does it include? (REVISED)	Appendix A of the HPRP Notice provides a list of the eligible grantees that can apply and receive HPRP funding directly from HUD through the Consolidated Plan Substantial Amendment process. HUD has developed a Substantial Amendment form that these eligible grantees must submit to HUD in order to receive HPRP funding. Local governments that are not eligible grantees and nonprofit organizations must contact the local or state grantee for information about becoming a subgrantee. It is up to each grantee to determine the appropriate eligibility and application requirements for their allocation.
4/24/09	HPRP	Where can I find the latest version of Form SF-424? (REVISED)	Use the SF-424 posted online at: http://www.grants.gov/techlib/424_20090131.doc
4/24/09	HPRP	Does the grantee have to engage in a competitive process for the selection of sub-grantees? Does this process have to be included in the Consolidated Plan submission?	HUD is giving discretion to grantees to develop their own allocation process. The grantee's plan for distribution, administration, and oversight of funds needs to be addressed in the Substantial Amendment that is submitted to HUD to receive HPRP funding. Note that it is the grantee's responsibility to ensure that any agency or organization receiving HPRP funding is in compliance with the requirements outlined in the HUD Notice.
4/24/09	HPRP	Can a state grantee sub-grant funds to another state agency, such as a state mental health or foster care agency?	A state grantee may not subgrant HPRP funds to another state agency. The American Recovery and Reinvestment Act cites Section 413 of the ESG statute as to how the funds must be allocated, and per Section 413(a), funds are intended for "distribution to local governments and private nonprofit organizations in the states." So, as under ESG, states cannot directly provide financial assistance or services and they cannot subgrant to another state agency.

4/24/09 HPRP	Form 40119 does not have much space on it for narrative. Is the form itself considered the "substantial amendment" or should we write a longer, more narrative amendment and attach it to the form?	Grantees are required to use the actual form (HUD-40119) posted on the HRE and on HUD's website. Since this form is in a Word format, grantees may enter as much information as needed to amend their Annual Action Plan appropriately. However, please be mindful of the maximum word guidelines.
4/24/09 HPRP	How long does it generally take for subgrantees to be issued a DUNS number? Is there any available guidance to help subgrantees as they register to get a DUNS number?	Please seek the following link regarding registration for a DUNS number: http://fedgov.dnb.com/webform/displayHomePage.do
4/24/09 HPRP	When preparing our amendment, would we have to spell out how we are going to allocate the entire HPRP grant in that initial amendment? For example, if a grantee is receiving \$1,000,000 in HPRP funds and wants to set aside \$600,000 for utility deposit assistance and short/medium term rental assistance, but is unsure how they are going to allocate the remaining \$400,000, would it be acceptable to state that the remaining funds will be used for other HPRP-eligible projects?	The substantial amendment, which must be postmarked no later than May 18, 2009, requires grantees to indicate the estimated amount for each of the four activity types (financial assistance, housing relocation and stabilization services, data collection and evaluation, and administration) within the two program types (homelessness prevention and rapid re-housing). The budget in the substantial amendment does not require grantees to indicate estimated budgets at a more granular level. The total requested must match the total HPRP amount budgeted. Grantees will report their final allocations and subgrantee selections in the Initial Performance Report due in October 2009.
4/24/09 HPRP	Will all the HPRP funds obligated by September 30, 2009 continue to be part of the 2008 Action Plan even if it is spent over the three year period? In year 2, could the grantee again amend the 2008 Action Plan to adjust allocations or subgrantees?	The Substantial Amendment to the Consolidated Plan 2008 Action Plan is the grantee's plan for spending HPRP funds. Grantees do not include their subgrantee selections and awards in their Substantial Amendment form. The subgrantee selection and award information will be collected in the Initial Performance Report due in October 2009. This is the only time that the substantial amendment for HPRP is required. However, if the grantee's Consolidated Plan process requires that a change to the budget in a substantial amendment requires a new substantial amendment, grantees may submit to HUD an amendment to the 2008 Consolidated Plan 2008 Action Plan.
4/3/09 HPRP	I have lost my job and I am losing my home. I will be homeless in about one month. How do I apply for HPRP funds?	The Homelessness Prevention and Rapid Re-Housing Program (HPRP) is a new program funded under the American Recovery and Reinvestment Act of 2009. Funds will be awarded to eligible cities and states over the coming months as they submit their applications to HUD. HUD does not provide funding directly to individuals. Individuals needing assistance will be able to access services from an agency in their local community once HPRP funds have been distributed. HUD will continue to post HPRP information to the Homelessness Resource Exchange on the HPRP page as it becomes available. In the meantime, individuals and families seeking immediate assistance are encouraged to contact their local Continuum of Care. For contact information, visit HUD's Continuum of Care locator . Select your state, and then look for your city or county. If you do not see your city or county listed, look for a Balance of State continuum. Contact the Point of Contact for Homeless Persons. Your local CoC representative can refer you to resources that are currently available in your community.
3/20/09 HPRP	Do HPRP funds have a match requirement?	No, grantees are not required to match HPRP funds with any other funding.
3/20/09 HPRP	Why was \$500,000 chosen as the minimum amount that will be allocated to grantees?	HPRP funds were allocated according to the Emergency Shelter Grants (ESG) formula. In the ESG program, the minimum grant amount is 0.05 percent; however, the Recovery Act gave the Secretary discretion to set the minimum grant amount. At \$500,000 (approximately 0.033 percent), more metropolitan cities and urban counties can receive funds directly than in ESG. The intent is to expedite the process of getting the funds to the program participants, who need the assistance quickly.
3/20/09 HPRP	When will HUD complete their review of the substantial amendments?	HUD will complete its review of all correctly completed substantial amendments within 45 days of receipt of each substantial amendment, but no later than July 2, 2009. Jurisdictions with disapproved substantial amendments may revise and resubmit a substantial amendment within 15 days after HUD sends the first notification of its disapproval; and HUD will approve or disapprove the revised substantial amendment within 15 days of receiving it.
3/20/09 HPRP	What happens if the eligible grantee wants to decline funding?	If an eligible grantee receives an allocation of funds under HPRP and wishes to decline the funding, the legally authorized official must notify the local HUD field office in writing of the grantee's intent to decline the HPRP funding on or before May 18, 2009.
3/20/09 HPRP	What happens if the eligible grantee wishes to request less funding than the total allocation amount?	If an eligible grantee wishes to request less than the total allocation amount for which it is eligible, the legally authorized official must notify the local HUD field office in writing of the amount the grantee will request on or before May 18, 2009.
3/20/09 HPRP	What happens if the eligible grantee does not submit a completed application within the timeframe allotted?	If an eligible grantee fails to submit a completed application package (substantial amendment, certifications and SF-424) for its grant allocation per the requirements detailed in the Notice, HUD will notify the jurisdiction of the cancellation of all or part of its allocation amount and proceed to reallocate the funds.

3/20/09 HPRP	What happens if the grantee cannot meet the expenditure threshold?	If the grantee cannot meet this threshold, HUD may then proceed to recapture the unused HPRP funds and reallocate them.
3/20/09 HPRP	Is the HPRP part of the Consolidated Plan process?	Portions of the Consolidated Plan process related to the application and approval process for receiving HPRP funds do apply, as indicated in the Notice. Grantees must submit an amendment to the Consolidated Plan 2008 Action Plan in order to receive funds, and grantees are required to take public comment on it before finalizing it. However, this public comment period has been reduced to at least 12 days instead of 30 days as is normally required for a substantial amendment. Also, grantees are not required to report on HPRP in their Consolidated Annual Performance and Evaluation Report (CAPER), as the reporting requirements from Congress and OMB take the place of this.

Topic: Post-Award and Timeliness Requirements

Date	Program/System	Question	Answer
9/11/09 HPRP		What is the September 30th deadline and what are the consequences if we cannot meet it? Can we request a waiver of this deadline?	Section V.A.1. of the HPRP Notice requires grantees to "award or enter into legally binding agreements with all subgrantees by September 30, 2009." If a grantee issues award letters to subgrantees by the deadline, HUD will consider the grantee to have met the requirement. HPRP is a part of the Recovery Act, and therefore, it is vital that subgrantees have access to the funds so that the assistance can reach those in need as soon as possible. HUD strongly encourages grantees to do everything possible to meet this deadline, and will not grant waiver requests. As with all program requirements, noncompliance with the September 30th deadline will increase the grantee's risk level for monitoring and may result in monitoring findings and/or sanctions.
8/14/09 HPRP		How should indirect costs be allocated?	Organizations with an approved indirect cost rate cannot charge that rate to a single "indirect cost" line item in the grant. Instead, they should break out the costs necessary to operate the program and charge them directly under either Financial Assistance or Housing Relocation and Stabilization Services or Data Collection and Evaluation, whichever is appropriate. For example, the appropriate proportion of the salary for the staff person responsible for making rental assistance payments is allowable under "Financial Assistance." In this scenario, the proportionate cost of a new computer for that staff person to issue financial payments is also allowed. Therefore, under HPRP, many costs otherwise included in an indirect cost rate are charged as direct costs under the appropriate line item.
8/14/09 HPRP		Can HMIS be used as third-party documentation of an applicant's homeless status?	HMIS may be used to document homelessness in three ways: 1. Data on the program participant's residence in an emergency shelter or transitional housing program for homeless persons was collected in the HMIS; 2. A street outreach program entered data about a program participant living on the streets, park, etc. in the HMIS; 3. The HMIS has "homeless status documentation/certification" functionality so that when one agency in a community documents a person's homeless status, that information/certification is available to other providers in the community.
8/14/09 HPRP		The HPRP Notice indicates that HUD is requiring grantees and subgrantees to certify eligibility at least once every 3 months for all program participants receiving medium-term rental assistance. Can these assessments be conducted by telephone?	The reassessments can be conducted by telephone in cases where distance prohibits a face-to-face assessment, though HUD encourages face-to-face assessments whenever possible. Local travel for program employees (e.g., mileage) is an eligible case management expense.
8/14/09 HPRP		Is there an HPRP process for handling appeals if a potential client is denied service by a grantee/subgrantee and wants to file an appeal?	The HPRP Notice does not prescribe an appeal process; however, HUD recommends that grantees and subgrantees develop and make public such a process.
8/14/09 HPRP		Is it possible for grantees and subgrantees to draw down funds in advance of expenditure? Given the high costs of housing, it may be difficult for some agencies to front these costs.	Unlike ESG, grantees and subgrantees may be paid in advance, pursuant to procedures outlined in 24 CFR 84.22 for nonprofit organizations and 24 CFR 85.21 for units of government. Payments are made to the grantee upon its request after the grant agreement has been fully executed. All requirements in 24 CFR 84.22 or 24 CFR 85.21, as applicable, including the standards for financial management systems and limitations on advance payments or working capital advances, apply to HPRP grantees and subgrantees. If you need additional guidance about advance payment requirements, please contact your local HUD Field Office.
8/14/09 HPRP		At what point must a grantee prepare a budget amendment? For the Supportive Housing Program, budget amendments are triggered if there is a change in a particular budget category that exceeds 10 percent.	HUD has not set a specific percentage for changes to the HPRP budget submitted in the grantee's substantial amendment. The Consolidated Plan regulations require grantees to establish criteria in their Citizen Participation Plan for what constitutes a substantial amendment to its Consolidated Plan. Therefore, HUD does not determine when a substantial amendment is necessary - this is determined by the grantee's Citizen Participation Plan. However, when the grantee makes a budget change or other change to the substantial amendment that was submitted, grantees must send a copy of the revised substantial amendment to the local HUD Field Office and report it on the Quarterly Performance Report. To see criteria for amendments, refer to Section 91.505 of the Consolidated Plan Final Rule 24 CFR Part 91.

8/14/09 HPRP	Does the rent reasonableness requirement apply to the payment of arrears? Likewise, does the requirement apply to rental assistance where there is a current lease in place (i.e., prevention assistance)?	Yes, the rent reasonableness requirement applies to the payment of arrears. It also applies to homeless prevention assistance where there is a current lease in place. Thus, if the rent does not pass the rent reasonable standard, you would not be able to assist the household in that unit.
8/14/09 HPRP	Must grantees obligate 100% of funds by September 30, or can they reserve a portion of the funding to be awarded in years 2 and 3 based on subgrantee performance?	As indicated in the Notice, all funds must be obligated to subgrantees by September 30, 2009. However, grantees may establish spending or performance expectations, and they may recapture and reallocate funds from subgrantees who do not meet the requirements.
8/14/09 HPRP	How will HUD's monitoring for HPRP be conducted?	HUD will conduct on-site monitoring using the CPD Monitoring handbook 6509.2 as a guide, as is done with ESG or CDBG and other CPD programs. HUD is currently developing specific monitoring procedures for HPRP. HUD will also conduct desk (off-site) monitoring, and will be examining grantee draws and financial reporting in IDIS to evaluate rates of spending and to ensure that the grantees are drawing HPRP funds for eligible activities. Grantees will be monitored for compliance with applicable lead-based paint requirements in accordance with the CPD Monitoring handbook, chap. 24, Lead-Based Paint.
8/14/09 HPRP	What guidance is available on calculating household income? (REVISED)	<p>HUD is encouraging HPRP grantees to use the Section 8 definition for calculating household income (see http://edocket.access.gpo.gov/cfr_2005/apr/qtr/pdf/24cfr5.609.pdf). Chapter 5 of the Housing Choice Voucher Guidebook (available at http://www.hud.gov/offices/pih/programs/hcv/forms/guidebook.cfm) provides guidance on calculating household income, and verification guidance can be found on HUD's web site at http://www.hud.gov/offices/pih/publications/notices/Q4/verifguidance.pdf.</p> <p>Given the time-sensitive nature of providing homelessness prevention assistance, HUD does not require grantees to comply with the Section 8 verification requirements. HUD TA providers are creating additional guidance and sample tools on this topic. The resources will be posted on the HRE as soon as they become available.</p> <p>Note: While assets must be taken into account when calculating household income to make the eligibility determination, HUD has not established requirements related to the treatment of assets for the purpose of determining type and level of assistance under HPRP. Thus, whether an eligible household is required to spend down all of its assets or is allowed to retain a reasonable amount of assets is a local determination.</p>
8/14/09 HPRP	When will the revised HMIS technical standards be published, and what are the HMIS requirements under HPRP?	The HMIS Data Standards Revised Notice is currently available at http://hudhre.info/documents/HMISDataStandardsFinal.pdf
6/10/09 HPRP	What is the timeframe to spend HPRP funds? (REVISED)	The Recovery Act requires grantees to draw down from IDIS 60 percent of HPRP grant funds within two years of the date that HUD signed the grant agreement, and 100 percent of funds within three years of this date. If a grantee receives any reallocated funds, these must all be expended within three years of the grantee's initial grant agreement as well. No expenses may be incurred after the 3-year expenditure deadline, but grantees may draw down funds to be reimbursed for eligible HPRP expenses incurred during the 3-year grant period for up to 90 days after the grant period ends.
6/10/09 HPRP	Can the last month of a participant's income be used as a qualifying factor versus the last year of income? Could a person who has just recently lost his/her job and is on the verge of becoming homeless, whose previous annual income was above 50% of AMI, qualify for assistance?	Yes, the 50% AMI limit is not based on the household's previous income, but on its income and assets at the time of application to the program. If an individual recently lost his/her job and has no income or assets that put them above 50% of AMI, and meet all the other eligibility criteria, they are eligible to receive HPRP assistance.
6/10/09 HPRP	Page 22 of the Notice states that "HUD requires grantees and/or subgrantees to evaluate and certify the eligibility of program participants at least once every 3 months for all persons receiving medium-term rental assistance." Does the reassessment/recertification requirement apply only to those households receiving financial assistance?	No, the reassessment/recertification requirement applies to all households served under HPRP, whether they are receiving financial assistance and services or just services.
6/10/09 HPRP	Does the recertification of program participants who relocate to another jurisdiction have to be conducted face to face? If so, which party (subgrantee or program participant) is expected to travel to complete the recertification?	HUD recommends that the recertification process be conducted in person if possible. The costs associated with grantee and subgrantee staff traveling to meet the participants are eligible under either Financial Assistance or Housing Relocation and Stabilization Services. No HPRP funds for travel may be paid for or on behalf of the participants.
6/10/09 HPRP	Will a Single Audit be acceptable for the HPRP program or will a project audit be	All grantees and subgrantees must conduct audits as required under the OMB Circulars for the type of organization and the funding streams received by the organization. In general,

	required?	an HPRP-specific project audit will not be required in addition to a Single Audit (see OMB Circular A-133 for more information). Please note that the Recovery Act states that for fiscal years ending September 30, 2009 and later, all Single Audit reports filed with the Federal Audit Clearinghouse will be made publicly available online.
6/10/09 HPRP	With regard to the obligation of funds, page 32 of the Notice states that "grantees must award or enter into legally binding grant agreements with all subgrantees by September 30, 2009." Is there a difference between "awarding funds" and entering into a "legally binding agreement"?	No, there is no difference. Section V. J. of the Notice on page 36 states "Grantee signs agreements with subgrantees by September 30, 2009." Therefore, "grantees must award" means that the grantee must have signed agreements with the subgrantees by September 30, 2009.
5/8/09 HPRP	Grantees and subgrantees have three years from the date the grant agreement is executed to expend all funds. Will there be a grace period so that a client enrolled near the end of the grant agreement period can continue to receive assistance for the entire length of time deemed necessary to stabilize that client?	HPRP funds may not be expended after three years from the date of the grant agreement. This means that grantees and subgrantees will need to plan in advance - in order for a program participant to receive a full 18 months of rental assistance, they would need to begin receiving it 18 months before the grant expires. If a participant seeks assistance 4 months before the grant expires, that household would be able to receive a maximum of 4 months of rental assistance.
5/8/09 HPRP	Would the assistance to pay for up to 30 days of motel/hotel stay, a security deposit, or three months of storage count toward the 18 month limitation for rental assistance? For example, if a program participant receives a voucher for a 30-day stay at a motel, and then receives security deposit assistance, would that participant be eligible for 18 months of rental assistance?	The only activity that counts towards the 18-month maximum is the payment of rental arrears. Motel/hotel vouchers, security/utility deposits, and moving assistance (including the storage fees) do not count toward the 18-month maximum of rental assistance.
4/24/09 HPRP	Can grantees draw down funds as a cash advance, or do they have to get reimbursed as with ESG? (REVISED)	The preferred method is reimbursement. However, grantees and subgrantees may be paid in advance, pursuant to procedures outlined in 24 CFR 84.22 for nonprofit organizations and 24 CFR 85.21 for units of government.
4/24/09 HPRP	How is rent reasonableness determined?	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.
4/24/09 HPRP	Will HUD be issuing sample Housing Assistance Payment (HAP) contracts to be used for short-term and medium term rental assistance similar to the HOME TBRA forms available on HUD's website?	No, HUD is giving grantees the discretion to determine which documents to use under its local HPRP program. However, HUD is posting a library of community documents on its web site at http://hudhre.info/index.cfm?do=viewResourcesByTopic&topicid=78 (Resources are being added on an ongoing basis.) Grantees and subgrantees are encouraged to peruse these documents to determine which they could adapt for their local program.
4/3/09 HPRP	Will there be flexibility to adjust budgets among the four eligible funding areas during the contract period?	HPRP grantees may adjust budgeted amounts for the eligible activities just as they do under ESG. The Substantial Amendment to the grantee's 2008 Annual Action Plan, completed by the grantee to receive HPRP funds, is only a planned budget. Actual budgets may vary during implementation. A grantee should consult its citizen participation plan (in the grantee's Consolidated Plan) to determine if the grantee provides a threshold amount for budget changes for which local citizen participation and consultation is required. The HPRP grantee must document changes in IDIS via funds committed to projects and activities. The grantee should use its own internal process to document contract changes with subgrantees.
4/3/09 HPRP	Is there a cap on any of the funding categories? For example, is there a cap on services or data collection and evaluation?	The only limit is on administrative costs, which are limited by statute to 5 percent of the grant amount. Grantees should consider the extent and variety of needs in their communities in order to determine how much to spend on any given type of activity.
4/3/09 HPRP	Is there guidance available on documenting a participant's "risk of homelessness"?	HUD has not yet developed specific documentation requirements for prevention assistance under HPRP. However, as stated in the Notice, the grantee or subgrantee must maintain documentation on client eligibility, which includes that the household is either homeless or at-risk of homelessness and is at or below 50% AMI, that no appropriate housing options have been identified, and that the household lacks the financial resources and support networks needed to obtain immediate housing or remain in its existing housing. Examples of appropriate documentation may include an eviction notice or writ of eviction, documentation of loss of income, pay stubs, letter of eviction from a family member, etc. Many communities have developed specific practices related to documentation for prevention assistance. HUD encourages you to review the community documents listed on the HRE's Resources by Topic: HPRP .

4/3/09 HPRP	With regard to verifying and documenting an individuals' risk of homelessness, is a letter from a landlord stating that he/she will begin eviction proceedings unless the rent is paid sufficient documentation, or does HUD require an actual eviction notice?	HPRP funds are intended to assist persons who would become homeless but for the HPRP assistance. HUD has provided grantees the flexibility to target HPRP funds and determine when persons are most likely to become homeless unless they receive HPRP assistance. Grantees are required to maintain documentation, but HUD has not yet prescribed the type of documentation required.
4/3/09 HPRP	What category does staff time for screening clients for eligibility and processing client applications fall under? Are these considered administration costs or service costs?	Staff time associated with administering a particular program activity is charged to that program activity. Staff time for screening clients and processing client applications would be considered case management and are eligible under housing relocation and stabilization services.
4/3/09 HPRP	Is completion of "Rent Reasonableness Checklist and Certification" required documentation for payments related to rental arrears, security deposits, utility deposits, or other financial assistance?	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.
4/3/09 HPRP	Are grantees allowed to charge a program fee (e.g., 30% of a participant's adjusted gross income) and use it to establish a savings account for the participant?	Grantees and subgrantees may not charge program fees to participants. However, programs may be designed to require participants to pay a portion of their income for rent and/or into escrow/savings accounts for the purpose of maximizing their housing stability.
3/20/09 HPRP	What is the deadline to submit the substantial amendment?	Substantial amendments, certifications, and the SF-424 (the application package) must be postmarked by May 18, 2009.
3/20/09 HPRP	What is the deadline for grantees to obligate funds?	Grantees must select all subgrantees and obligate funds to them by September 30, 2009.
3/20/09 HPRP	What happens if the grantee does not spend at least 60 percent of the grant amount within the 2 year timeframe?	Any grantee failing to meet the statutory requirement to expend at least 60 percent of its grant amount within 2 years of the date of the obligation, will be notified by August 1, 2011 and given 21 days to submit information to HUD regarding additional eligible expenses for HPRP activities accrued within the 2-year period in order to bring the grantee into compliance with the 60 percent requirement. In cases where the grant agreement is signed after July 30, 2009 so less than two years has elapsed, HUD will notify grantees in the same manner if it appears that the grantee will fail to meet the 60 percent requirement.

Topic: Reporting Requirements

Date	Program/System	Question	Answer
8/14/09 HPRP		When will the QPR report format be available?	The information that grantees will be required to collect and submit to HUD for the Initial Quarterly Report (the data elements) has been published, and is available on the HUD HRE. Because HUD anticipates that grantees will complete the QPRs electronically, HUD is not developing a reporting format. By early September, the screens will be finalized and HUD can share those screens with grantees and subgrantees.
8/14/09 HPRP		HUD guidance requires that all grantees report client-level data in an HMIS or comparable system. In states where there are numerous CoCs, many agencies within these various CoCs are likely to be state subgrantees for HPRP. These CoCs may use different HMIS systems that are not set up to communicate with each other. Can the state require that subgrantees report HMIS data directly to HUD as opposed to the State administering agency?	All reports must be submitted to HUD by the grantee. The grantee cannot require that subgrantees report directly to HUD. However, it is possible to use HPRP "Data Collection and Evaluation" funds to develop a data warehouse for use in aggregating the data that will come to the state grantee from multiple systems for the purposes of reporting to HUD. This would be considered an eligible cost. Under this scenario, the state could charge each subgrantee a data warehousing/HMIS fee (paid out of the Data Collection and Evaluation line item at the subgrantee level) to cover the costs of developing and maintaining the data warehouse for HPRP reporting purposes.
8/14/09 HPRP		Are grantees required to contract for HPRP HMIS with the current HMIS lead agency, or may they contract with a new lead agency specifically for administration (of the same system-software) for HPRP?	A CoC may have only one HMIS lead agency to administer the HMIS on behalf of the CoC. Since HPRP data collection and reporting is part of the HMIS, the CoC's HMIS lead agency is responsible for HMIS-related activities for HPRP. Therefore, an HPRP grantee may not select and fund another agency to administer HMIS data collection and reporting for HPRP.
8/14/09 HPRP		Will HUD require that grantees submit their QPRs to HUD Headquarters and the appropriate HUD Field Office?	HUD expects that reports will be submitted electronically and will therefore be available to both Field Offices and Headquarters. HUD will issue guidance on reporting requirements as soon as it is available.
8/14/09 HPRP		Under data collection and evaluation, the notice says that reporting must be done through HMIS or a "comparable client-level database". Could you please explain what	In order to be considered a comparable client-level database, it must comply with the HMIS Data and Technical Standards. The use of a comparable database is allowable under the following circumstances: (1) The grantee's jurisdiction is not located within a CoC; (2) The CoC does not have an HMIS; (3) The grantee and/or subgrantee has a long-standing, client-

type of comparable client-level database would be acceptable? And who makes that determination? (REVISED)

level legacy data collection system that meets requirements established in the HMIS Data and Technical Standards and will integrate data with HMIS data periodically; or (4) The subgrantee is a domestic violence provider (e.g. organization's primary mission is serving victims of domestic violence/sexual assault/date rape/stalking) or a legal services provider and requires client-level information to remain confidential, and will establish a comparable client-level database internally to its organization (e.g. no identifying data shared with the HMIS or the grantee) and will provide only aggregate data to the grantee as required. The HMIS administering agency, as an agent of the CoC, determines if an alternative database meets the standards for a comparable client-level database, including compliance with the HMIS Data and Technical Standards.

7/7/09 HPRP	Is there specific reporting guidance available for domestic violence providers?	Yes. On July 7, 2009 HUD released additional reporting guidance for victim service providers funded by the Homelessness Prevention and Rapid Re-Housing Program (HPRP). This guidance document will assist HPRP grantees, subgrantees and HMIS administering agencies to understand and comply with data collection requirements for domestic violence providers.
5/8/09 HPRP	How should a grantee calculate the budget for Data Collection and Evaluation costs? Is there a recommended or maximum amount that grantees should budget for Data Collection and Evaluation costs?	<p>HPRP grantees are required to collect client-level data through the CoC's Homeless Management Information System (HMIS) or a comparable database to comply with the HPRP monitoring and reporting requirements. HPRP funds may be used to pay reasonable costs associated with data collection, data entry, data analysis, reporting and participation in HUD evaluation for HPRP.</p> <p>While preparing the substantial amendment, grantees should realistically budget for existing and future HMIS costs related to HPRP, remembering that HPRP funds must be expended by September 30, 2012. HUD encourages grantees to carefully consider costs for the following items when developing their budgets for Data Collection and Evaluation.</p> <ul style="list-style-type: none"> • Hardware costs • Software costs (e.g., user licenses, annual support) • Participation fees • HMIS training (e.g., users, system administrator) • Staff costs, recognizing possibility of staff turnover (e.g., data collection/entry/analysis, reporting, system operation) • Data integration with comparable database (e.g., DV providers, legal services, legacy database) • Connectivity • Participation in national or regional HMIS training events (including travel) • Providing data to HUD for the national evaluation <p>HUD has not established minimum or maximum funding amounts for any HPRP activity category, except for administrative funds which are capped at 5% of the HPRP grant. HUD encourages grantees to carefully consider potential costs to be incurred for expanding HMIS for HPRP data collection, reporting and participation in the HUD evaluation of HPRP, and to budget accordingly.</p>
4/24/09 HPRP	Will client-level data need to be entered into IDIS reports and into the HMIS system? Or will the HPRP IDIS reports only have financial data?	Beneficiary data will not be entered into IDIS, however, grantees will draw HPRP funds through IDIS. HUD plans to use a current electronic system to begin collecting beneficiary data and outcomes in October 2009. HUD will provide additional guidance on both financial and beneficiary reporting by July 2009.
4/24/09 HPRP	Will there be new IDIS reporting requirements, other than the ones needed for ESG? If, so when will these requirements be published?	HUD anticipates that IDIS reporting requirements for HPRP will differ somewhat from the IDIS reporting requirements for the Emergency Shelter Grants (ESG) program. HUD anticipates providing preliminary guidance on IDIS reporting requirements by July 2009.
4/3/09 HPRP	When will HUD issue the Quarterly Progress Reports required for this funding?	<p>HUD is currently developing the formats and data elements that will be included in the Initial, Quarterly, and Annual Performance Reports referenced in the HPRP Notice. The data elements will be made available for public review and comment (through the OMB Paperwork Reduction Act process) prior to being finalized. HUD anticipates that this process will be completed sometime this summer.</p> <p>These reports will utilize the same data elements included in HUD's HMIS Data and Technical Standards plus any additional data that is required under the Recovery Act. These reports will not be the same as the CAPER or the ESG data currently collected through IDIS.</p>
4/3/09 HPRP	Participation in HMIS is mandated by this program. Is HUD taking the lead to make sure that grantees funded directly through entitled jurisdictions comply? Often, a CoC has little influence over another jurisdiction within the CoC to mandate participation.	The HPRP Operating Instructions for Field Offices and the HPRP Grant Agreement will include HMIS participation requirements. HUD will monitor HPRP grantees for compliance with the requirements.

4/3/09 HPRP It appears that the Performance Reports will require grantees to report on "the number of jobs created and retained." What entity is responsible for creating the jobs and who are the potential employees to be hired? One of the requirements of the Recovery Act of 2009 is that jobs that are created and/or retained through the use of these funds be tracked and reported. For HPRP, this could be jobs created or retained at the grantee or subgrantee levels. For example, a subgrantee may need to hire three case managers to operate a new Homelessness Prevention program in a particular County. These three jobs will be reported as "created" through the use of HPRP funds.

4/3/09 HPRP It states in the HPRP Notice that for HMIS, funds can be used for Data Collection and Evaluation costs, but is limited to jurisdictions that do not have an HMIS already implemented. How does this address the cost of data entry for existing HMIS users? And, if a new subgrantee receives HPRP funds but does not currently use HMIS, can HPRP funds be used to pay for their training, computer equipment, and other associated costs, including access to DSL? There are five eligible HMIS cost categories for HPRP, which would fall under Data Collection and Evaluation: (1) **Equipment**. Leasing or purchase of hardware (computers, servers, printers), networking, and security; (2) **Software**. User licensing for existing HMIS software, purchase of HMIS software (only if CoC does not have an HMIS and with HUD Headquarters approval), support and maintenance, tools that support existing software, and participation fees; (3) **Services**. Third-party training, technical services, programming (customization, system interface, data conversion), connectivity, disaster and recovery, and data integration support; (4) **Personnel**. System administrators, trainers, technical staff, and data entry, analysis, and programming support; and (5) **HMIS space and operations**. Grantees that are the HMIS administering agency and/or will be providing services directly to HPRP participants may use HPRP funds to expand the scope of the HMIS for data collection and reporting for HPRP. Grantees that do not administer the HMIS or will not be providing direct service may provide funds to the HMIS administering agency to allow the HMIS to expand the scope of the HMIS. A subgrantee may use HPRP funds to fund activities necessary for the organization to implement the HPRP data collection and reporting requirements in the CoC's HMIS.

Topic: Technical Assistance and Training

Date	Program/System	Question	Answer
6/10/09	HPRP	What resources are available to help grantees implement and manage their programs?	HUD's national technical assistance providers are working on the development of HPRP-specific tools and resources. These items are continually being posted on the HPRP page of the HRE (http://hudhre.info/index.cfm?do=viewResourcesByTopic&topicid=78) as they become available, so check back frequently
5/8/09	HPRP	Can HPRP administrative funds be used to pay for technical assistance?	<p>Grantees may hire a contractor to help prepare their substantial amendment. (This is an eligible pre-award cost.) Following execution of the grant agreement, grantees may also use administrative funds to hire a consultant to assist with aspects of grant administration, including tasks related to the allocation of funds to subgrantees, system/program design, data collection and reporting, etc.</p> <p>Grantees may NOT use funds to hire a consultant or technical assistance provider to provide general training on HPRP. HUD is using national funds to host a series of regional HPRP workshops during May and June of 2009, and will be providing resources to assist grantees throughout the three-year period of the program. However, grantees may hire a consultant or contractor to develop and conduct training on the policies or procedures that are specific to the grantee's implementation and program design for HPRP funds. Grantees may also hire a consultant or contractor to deliver HUD-developed training curricula on HPRP, once HUD has posted approved curricula on the HRE. Note that consultants or contractors may not develop and deliver training on HPRP that has not been approved by HUD Headquarters.</p>
4/3/09	HPRP	When will HPRP Technical Assistance and Training be available to grantees?	HUD hosted a webcast on April 8, 2009, 2:00-4:00 PM EDT, which is archived on HUD's web site and may be viewed at any time by going to: http://www.hud.gov/webcasts/archives/ . Additionally, the Department plans to host nine 1-1/2 day regional meetings during May and June. As soon as the schedule for the regional meetings is finalized, HUD will publish the dates and locations as well as registration information. Additional technical assistance and training initiatives are also being planned and will be announced via the listserv and the HRE.