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CITY OF GAINESVILLE
every path starts with passion
FLORIDA

DATE: August 20, 2014

TO: Community Development Committee

FROM: Fred Murry, Assistant City Manager FM

SUBJECT: Report on the Rapid Rehousing Program

The Rapid Rehousing Program has been in existence for years and some cities and counties have gained national attention for their programs prior to HUD implementing the Program as a part of the Stimulus Program in 2009. On February 17, 2009, President Obama signed the American Recovery and Reinvestment Act of 2009, which included $1.5 billion for Homelessness Prevention and Rapid Rehousing Program (HRRP) which was distributed based on a formula used for the Emergency Shelter Grant Program (now known as the Emergency Solution Program). The City of Gainesville received a direct allocation of $567,404 for the Rapid Re-housing Program. The City contracted with the Alachua County Housing Authority to implement this program to assist eligible persons/families within Gainesville-Alachua County community.

The Rapid Rehousing Program is designed to provide:1) financial assistance services to prevent individuals and families from being homeless; and 2) to help those who experience homelessness to quickly rehouse and become stabilized. The program recognized that certain homeless individuals and families only need financial assistance and services in order to regain housing and stability. Some individuals and families may require long term financial assistance and case management to become stabilized.

The funds are intended to target individuals and families who would be homeless but for assistance and housing relocation and stabilization services including such activities as mediation, credit counseling, security or utility deposit, utility payment, moving cost assistance, motel and hotel vouchers, outreach and engagement services, housing search, legal services and case management services.

Here is an example of the minimum criteria for an individual or family to participate in the program:

- individuals and families provided with financial assistance must have at least one contact with a case manager;
- the household must be at or below 50% of the AMI;
- the household must be either homeless or at risk of losing housing and:
  - (1) no appropriate housing option identified; and
  - (2) the household lacks the financial resources and support network to obtain immediate housing or remain in the existing housing;
- clients receiving homeless prevention assistance must be assessed to determine that if without assistance the individual would become homeless;
- homeless persons receiving rapid rehousing assistance must meet the definition of homelessness *as defined by the McKinney Vento Homelessness Assistance Act, SEC. 103. [42 USC 11302], General Definition of Homeless Individual:*

(a) In general

For purposes of this chapter, the terms "homeless", "homeless individual", and "homeless person" means— [1]

(1) *an individual or family who lacks a fixed, regular, and adequate nighttime residence;*

(2) *an individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground;*

(3) *an individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including hotels and motels paid for by Federal, State, or local government programs for low-income individuals or by charitable organizations, congregate shelters, and transitional housing);*

(4) *an individual who resided in a shelter or place not meant for human habitation and who is exiting an institution where he or she temporarily resided;*

(5) *an individual or family who—*

> ***(A)*** *will imminently lose their housing, including housing they own, rent, or live in without paying rent, are sharing with others, and rooms in hotels or motels not paid for by Federal, State, or local government programs for low-income individuals or by charitable organizations, as evidenced by—*
>
> > ***(i)*** *a court order resulting from an eviction action that notifies the individual or family that they must leave within 14 days;*
> >
> > ***(ii)*** *the individual or family having a primary nighttime residence that is a room in a hotel or motel and where they lack the resources necessary to reside there for more than 14 days; or*
> >
> > ***(iii)*** *credible evidence indicating that the owner or renter of the housing will not allow the individual or family to stay for more than 14 days, and any oral statement from an individual or family seeking homeless assistance that is found to be credible shall be considered credible evidence for purposes of this clause;*
>
> ***(B)*** *has no subsequent residence identified; and*
>
> ***(C)*** *lacks the resources or support networks needed to obtain other permanent housing; and*

(6) *unaccompanied youth and homeless families with children and youth defined as homeless under other Federal statutes who—*

> ***(A)*** *have experienced a long term period without living independently in permanent housing,*
>
> ***(B)*** *have experienced persistent instability as measured by frequent moves over such period, and*
>
> ***(C)*** *can be expected to continue in such status for an extended period of time because of chronic disabilities, chronic physical health or mental health conditions, substance addiction, histories of domestic violence or childhood abuse, the presence of a child or youth with a disability, or multiple barriers to employment.*

(b) Domestic violence and other dangerous or life-threatening conditions

Notwithstanding any other provision of this section, the Secretary shall consider to be homeless any individual or family who is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions in the individual's or family's current housing situation, including where the health and safety of children are jeopardized, and who have no other residence and lack the resources or support networks to obtain other permanent housing.

(c) Income eligibility

(1) In general

A homeless individual shall be eligible for assistance under any program provided by this chapter, only if the individual complies with the income eligibility requirements otherwise applicable to such program.

(2) Exception

Notwithstanding paragraph (1), a homeless individual shall be eligible for assistance under title I of the Workforce Investment Act of 1998 [29 U.S.C. 2801 et seq.].

(d) Exclusion

For purposes of this chapter, the term "homeless" or "homeless individual" does not include any individual imprisoned or otherwise detained pursuant to an Act of the Congress or a State law.

(e) Persons experiencing homelessness

Any references in this chapter to homeless individuals (including homeless persons) or homeless groups (including homeless persons) shall be considered to include, and to refer to, individuals experiencing homelessness or groups experiencing homelessness, respectively.

In 2009, Gainesville (similar to many other communities) implemented the Rapid Rehousing Program. There are various models of the Rapid Rehousing Programs implemented across the United States. One program example is Hennepin County, Minnesota, (Elim Transitional Housing) which started its program in the 1980's to reduce the number of stays in the Homeless Shelters and to prevent individuals and families from becoming Homelessness (Attachment A). Another example is the Indiana Housing and Community Development Authority Program manual for the Rapid Rehousing Program (Attachment B). The National Alliance to End Homelessness Center for Capacity Building has developed and shared a Rapid Re-Housing Triage Tool (Attachment C) for communities to use as a starting point.

The Rapid Rehousing Program was implemented throughout the State of Florida as a result of the Federal Stimulus Funding. Here are few examples of cities and counties that implemented the Rapid Rehousing Program: Tallahassee, Marion County, Escambia County, Lee County, Orange County, Palm Beach County, St. Petersburg, Tampa, Miami Beach, Dade County, Broward County, Hialeah, Hollywood, and Fort Lauderdale. Etc. Attachment D includes the complete list of cities and counties participating in the 2009 Rapid Rehousing Program.

The Rapid Rehousing Program has a history of working extremely well; however, the program is used in conjunction with shelter care, case management services and other homeless services with the community. Included are two evaluations that were conducted on the Rapid Rehousing Program for Hennepin County, Minnesota and Los Angeles County, California, which has the second largest Homeless Population in the United States (Attachment E).

City staff supports the Rapid Rehousing Program Model and its implementation within Gainesville - Alachua County. City staff has been in contact with HUD and other State agencies researching funding opportunities for the Rapid Rehousing Program. Recently, the City submitted a letter of support for ACCHH to submit their application for Rapid Rehousing Program funds from the State of Florida under Emergency Solution Grant Program.

City staff will continue to look for funding opportunities for the Rapid Rehousing program. As such, staff will request for the City Commission to include the Rapid Rehousing Program in the Federal and State Legislative Packet for Fiscal Year 2015.

Rapid Re-Housing Manual

For

Providers

Executive Summary

Sue Watlov Phillips, M.A., C.S.P.

Executive Director, Elim Transitional Housing, Inc.

President, Integrated Community Solutions, Inc.

Dedicated to:

God, my parents and family, Elim Transitional Housing Staff and Board of Directors,

Hennepin County Staff and FHPAP, and

people at risk and/or experiencing homelessness.

Introduction

This Executive Summary is designed to help you think through the key building blocks of a Rapid Re-Housing and Prevention Program. Please use it as a guide. You will need to adjust it to your program's philosophy and community's resources. **Complete Manual will be available April 15, 2009.**

Please remember, that we all need a home and that we all utilize community services. We should not design programs that create separate housing and/or services for people at risk or experiencing homelessness but rather to reintegrate people back into our communities.

Rapid Re-Housing and Prevention is the outgrowth of the work many providers having been doing for three decades to assist people at risk or experiencing homelessness and to obtain housing in the community.

Elim Transitional Housing (ETH) began as a church based shelter at Elim Baptist Church in 1982-1983. We assisted people to move out of the shelter into housing. In 1983, we began the first transitional housing program in Minnesota utilizing a scattered site, independent housing model to **rapidly move people out of shelters and to prevent people from coming into shelters** or becoming homeless.

ETH became the model for the Minnesota Temporary Housing Bill (now called Transitional Housing) passed in 1984. The original bill provided rental assistance and services for 6 months. (The bill was later amended to bring it into conformity with Federal legislation-(originally 18 months) now 24 months.)

ETH also became the model for Hennepin County's Transitional Housing utilized in 1984, to assist people to move out shelters and limit the need for additional shelters by preventing people from becoming homeless.

In 1986, ETH provided assistance in writing the original McKinney Vento Act (Homeless Survival Act) which included Prevention and aspects of the Rapid Re- Housing Models (not enacted). In 1987, ETH provided technical assistance to HUD in the development of the transitional housing portion of the Act. While HUD did not initially embrace the scattered site, rent subsidy, turn -key model (where people continue to live in the same place), HUD has now finally fully embraced this model in the Rapid Re-Housing Models.

Rapid Re- Housing has been described in many ways: Transitional Housing, Relocation Assistance, Housing First, Rapid Exit (one of the national model's for Rapid Re-Housing - ETH developed with Hennepin County in 1993, utilizing initially Minnesota Family Homeless Prevention and Assistance funding and then adding McKinney Vento Supportive Housing Program- Services Only Funding).

The goal is the same: To assist people at risk or experiencing homelessness to re-integrate into our communities by obtaining /maintaining housing and to utilize the community based services they want and/or need.

Rapid Re- Housing

To assist people (families, individuals, and/or youth) to rapidly exit out of homelessness and to move back into housing in the community.

Services may include but not limited to:

1. Housing location, application/credit check fees, first month's rent and/or damage deposit, furniture and moving assistance, landlord tenant mediation.

2. Brokering appropriate other services in the community- employment, education and/or training, physical, mental, and/or chemical health services, child care, transportation assistance, legal services.

3. Rent Subsidies: Shallow rent subsidies.

Prevention

Assist people to maintain rental housing, for themselves, in the community.

Services may include but not limited to:

1. Payment for rent for past due rent.

2. Housing Relocation assistance, application/credit check fees, first month's rent and/or damage deposit, furniture and moving assistance, landlord tenant mediation.

3. Rent Subsidies: Shallow rent subsidies. Short Term: 1-3 months. Medium 4-18 months.

4. Brokering appropriate other services in the community- employment, education and/or training, physical, mental, and/or chemical health services, child care, transportation assistance, legal services.

Screening

A tool to obtain additional background information to assist in connecting people to appropriate community based resources and/or to make appropriate referral (s) for professional assessments (as needed).

1. Screening Tool (Appendix C)

2. Screening may be completed by agency staff, central intake location, travelling screener, etc.

Philosophical and Theoretical Basis

Faith: How we treat others is how we treat God. Love and treat others the way you would want to be treated if you were in the same situation.

Social Justice: Housing is a Human Right!

Theoretical Basis:

1. Maslow's Hierarchy of Needs:
    a. The basic needs of Housing, Food and Water, Safety must be met first.
    b. Higher level needs such as employment, education, health issues may be addressed more appropriately and effectively after basic needs are met.
2. Reality Therapy:
    a. Each person is responsible for their own lives and to be a responsible member of the community. (Self Reliance).
    b. Change only occurs in the Here and Now. You cannot change your past, you can only change your future by what you do today.
    c. Staff will utilize a guided discovery teaching model. Their role is to teach/ mentor people to access resources so they may address their needs.
3. Dream/ Strength Model- Each person is a unique creation of God, with their own special talents and abilities. (Appendix D)
    a. Identify person's dreams. Dreams are powerful motivators
    b. Identify their strengths which will help them be successful.
    c. Identify barriers/ problems which create instability in their housing and life.
    d. Identify realistic and measurable short and long term goals.

Attachment A

Rapid Rehousing

a manual for providers

Attachment A

Elim Tranisitional Housing's Screeners and Rapid Rehousing Staff

Contents

Attachment A

A PLACE TO CALL HOME

Rapid Rehousing Manual

by Sue Watlov Phillips, M.A., C.S.P.

Dedicated to God, my parents and family, Elim Transitional Housing Staff and Board of Directors, Hennepin County Staff and FHPAP and people who are at risk of and experiencing homelessness.

A PLACE TO CALL HOME

Attachment A

Introduction and History

Rapid Rehousing and Prevention is the outgrowth of work by Elim Transitional Housing and other organizations across the nation, over the course of the past three decades. This manual was designed to share the lessons learned as we've assisted people who are at risk or who are already experiencing homelessness to obtain and maintain housing.

Elim Transitional Housing originated in 1982 as a church-based shelter under the umbrella of Elim Baptist Church. The program served as a bridge from shelter to permanent housing. In 1983, Elim began the first transitional housing program in Minnesota using a scattered-site, independent housing model to rapidly move people from emergency shelters to housing. Elim also had mechanisms in place to help prevent people from becoming homeless.

Everyone needs a home.

All of us use community services.

Rapid Rehousing and Homelessness Prevention programs should avoid creating separate housing and services for people who happen to be at risk of or who are already experiencing homelessness. The goal is to reintegrate people back into our communities.

Elim Transitional Housing (Elim) was the model for the Minnesota Temporary Housing Bill (currently known as Transitional Housing). This Bill was passed by the State Legislature in 1984, and originally provided rental assistance and services for six months. This was later amended to reflect the number of months allowed under federal law.

Elim served as the model for Hennepin County's Transitional Housing Program, which was developed and funded in 1984. That program also assisted people to move from shelters and was crafted to limit the need for additional shelters through homelessness prevention.

In 1986, Elim staff assisted in writing the original McKinney Vento (Homeless Survival) Act. In 1987, ETH assisted HUD with developing the transitional housing portion of the Act. Initially, HUD did not embrace the scattered site, rent subsidy, turn-key models that allowed people to stay in the same place, but it has since come to embrace these concepts.

Through the years, rapid rehousing has had many names: transitional housing, relocation assistance, housing first and rapid exit. Hennepin County's national model for Rapid Rehousing was developed in 1992 with Elim's assistance. The County initially used Minnesota Family Homeless Prevention and Assistance funding and later expanded using *McKinney Vento Supportive Housing Program Services Only* funding.

Our goal is to assist people who are at risk of or who are already experiencing homelessness to reintegrate in the community by helping them obtain or maintain safe, affordable housing and by linking them to the mainstream, community-based services they need. This manual was designed to lead providers through the key building blocks of a Rapid Rehousing and Homelessness Prevention Program. It should be considered a guide and adjusted to reflect the philosophy and mission of particular programs, within context of available community resources and funding restrictions.

The Philosophical and Theoretical Basis for Rapid Rehousing

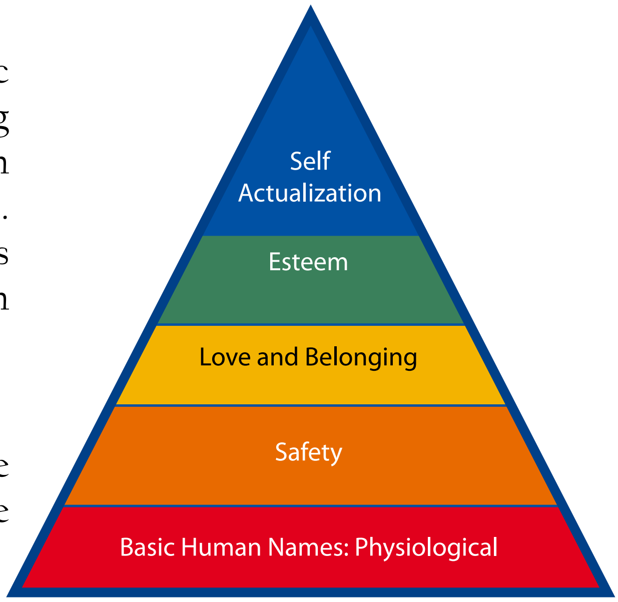
The Elim Rapid Rehousing Model was based on several philosophical constructs that have served over time to guide and inform the mission of the program. These are briefly described below.

Faith

The Golden Rule directs us to treat others as we would like to be treated. At Elim, we believe that the way we treat others is the way we are treating God. As people of faith, we are called to love one another and to put this love into action. The test for our activities comes down to how we would want to be treated if positions were reversed.

Theoretical Basis

Maslow's Hierarchy of Needs holds that the basic human needs of housing, food, water, clothing and safety must be met before human beings can move on to identify and meet higher level needs. Higher level needs (including such things as employment, education, family and health) can be addressed after survival needs have been met.



Maslow's Hierarchy of Needs

Reality Therapy

Almost all approaches to psychology assume that people have certain basic needs; the practice of Reality Therapy classifies them as:

1. Survival;
2. Fun (includes pleasure and enjoyment);
3. Freedom (includes independence, autonomy);
4. Love and belonging; and
5. Power (includes achievement, feeling worthwhile and winning).

Reality Therapy holds that each person is responsible for his or her own life and for becoming a responsible member of the community. It also teaches that change can only occur in the here and now, and that while the past cannot be changed, the future can be influenced by today's actions. Elim staff uses a guided discovery teaching model to help people access the resources they to meet their particular needs.

Dream/Strength Model

Each person is unique with special talents and abilities. Elim staff helps people identify their dreams, the strengths that can help them achieve success, barriers to housing and to identify short- and long-term goals. Together, these serve as powerful motivators to help people change their lives.

A socially just community recognizes that safe, stable housing is a basic human right.

Prevention of homelessness must be a priority

- **Assist people to maintain rental housing, for themselves, in the community. Prevention Services may include (but are not limited to):**

1. Payment for past due rent and/or utilities;
2. Housing relocation assistance, including application/credit check fees, first month's rent and/or damage deposit, furniture and moving assistance, landlord tenant mediation;
3. Subsidizing rent - either one-time (shallow), or for short or medium terms.
4. Brokering or linking clients with other community services, such as employment assistance, education, training, physical, mental, and/or chemical health services, child care, transportation assistance or legal services.

(Note: A more detailed description on developing a prevention program is available from Elim Transitional Housing - www.elimtransitionalhousing.org.*)*

Screening

- **The community or program must develop and implement a plan to rapidly rehouse people who are already experiencing homelessness. Screening is done using a tool specifically designed to elicit background information that can be used to assist in connecting people with appropriate community based resources and to make referral(s) for professional assessments.**

1. Screening may be completed by agency staff, central intake personnel a traveling screener or other appropriately trained personnel.
2. The screener provides a brief overview of the screening process. The screener completes the data privacy form, releases of information and the screening form with the head of the household.
3. The screener completes a criminal background check to identify any potential outstanding warrants or other issues that may impact the rehousing process. Outstanding warrants must be addressed by the household prior to referral to Rapid Rehousing staff.
4. Screening guidance, criteria and tools have been included in pages 12 - 15 of this document.

(Note: A sample Screening Tool and a Barrier Assessment are available from Elim Transitional Housing - www.elimtransitionalhousing.org.)

Rapid Rehousing

Attachment A

- Rapid rehousing is assisting people in ways that help them quickly exit homelessness and move back into stable community housing.

Rapid rehousing services may include (but are not limited to):

1. Locating housing, paying application/credit check fees, first month's rent and/or damage deposits, providing moving assistance and practicing landlord/tenant mediation.
2. Brokering or linking clients with other community services, such as employment assistance, education, training, physical, mental, and/or chemical health services, child care, transportation assistance or legal services.
3. Subsidizing rent - either one-time, or for short or medium terms. The rental unit lease agreement is in the assisted household's name.

Rapid Rehousing payments* may include:

1. Payments for application fees, first month's rent and security deposit;
2. Furniture/moving assistance and storage fees to assist the household with moving into the new unit; and/or
3. A shallow rent subsidy. (Typically a shallow rent subsidy is $200/month for a one-bedroom unit, $300/month for a two-bedroom unit and $400/month for a three-bedroom unit. This may vary based on the fair market rents established annually by HUD.)
4. The level of subsidy will vary by community. The goal is to keep the subsidy at a minimal level, so that when the subsidy ends, people can sustain and maintain the unit without further assistance.

* People must check with each funding source in use to ensure that these are eligible costs.

A PLACE TO CALL HOME

Rapid Rehousing Staff Qualifications

— **Cultural competence:** staff composition should be consistent with client population in terms of race and ethnicity. Staff must be able to communicate effectively with a diverse population, all of whom are struggling with complex issues.

— **Experience with homelessness:** priority should be given to people who have experienced homelessness, though if they are former clients, there should be two years of separation from your organizational services.

— **Excellent written and verbal communication skills:** staff must be able to communicate effectively with a diverse client population, service providers, landlords and other governmental and community-based entities.

— **Ability to develop extensive community networks:** staff members must have the capacity to become community services experts and to assist through brokering services and resources needed and wanted.

— Staff must be comfortable "selling" the program to landlords and able to follow through with participants and landlords. They must be available by cell phone and/or beeper to assist in landlord/resident mediation after placement.

— **Ability to coordinate:** Staff must be able to work effectively with the supervisor on the availability of rent subsidies. Subsidies can be short-, medium- or longer-term, if available, but because of limited funding resources, subsidies cannot be made available to every household.

TIP: Rapid Rehousing Staff should include one (1) FTE per ten NEW and 30 previously placed households per month.

The demographics of Elim Transitional Housing Screening and Rapid Rehousing staff reflect the demographics of our client pool.

- **85% are people of color**
- **70% have experienced homelessness**

Responsibilities of Rapid Rehousing Staff

Rapid rehousing staff members provide an overview of the program for potential clients, and help complete a dream sheet, a Rapid Rehousing contract and a voter registration form, if necessary. Staff members also assist with completing releases of information for potential landlords, economic assistance, moving assistance and credit checks. Following these steps, The client is asked to complete a brief test on their rights and responsibilities under Landlord/Tenant Law. This allows staff an opportunity to educate on any gaps in knowledge. Staff then gathers any additional information needed (see the Rapid Rehousing Checklist, Page 19).

Rapid Rehousing staff assist the household in identifying appropriate and affordable rental housing units; inasmuch as possible, units should be readily accessible to public transportation, shopping centers, schools and other necessary services. Staff members will develop a referral list of landlords. The rapid rehousing staff can also assist households in accessing services, including employment and educational services and opportunities, food, clothing, additional furniture and other social services.

Follow-up services after placement are voluntary. Typically, rapid rehousing staff will check in with the household at least twice monthly for the first six months. Case management services may be more intensive, based on the population served and programmatic funding requirements.

Note: A typical case load will include approximately 10 new households per month, in addition to open case loads of approximately 40 households at a given time.

Prevention and Rapid Rehousing can be used successfully with families, youth, couples and individuals.

Outcomes

The outcomes must be related to the goals of the program: to prevent homelessness and to rapidly rehouse people within the community.

Prevention

1. Did the household that received prevention assistance remain housed?
2. Did the household stay out of shelter for at least one year?

Rapid Rehousing

1. Did the household that received rapid rehousing assistance remain housed?
2. Did the household stay out of shelter for at least one year?
3. Did the household access additional community resources to help address their needs?
4. Did the household have sufficient income to maintain housing after the subsidy ended?

Rapid Rehousing Screening Guidelines

Assessing Housing Barrier Levels

The following guidelines are used to assess and categorize a family's barriers and to determine whether the family can be appropriately referred for housing placement assistance. Housing barriers may be disclosed by the family or discovered in context with a records search.

Level 1: Zero to Minimal Barriers

Level 1 families have relatively good rental histories that do not include evictions, criminal involvement, active chemical dependency or domestic violence. They may need information about searching for housing, help with application fees or miscellaneous housing start-up expenses. These families receive an informational packet and sample rental application form.

Level 2: Moderate Barriers

Level 2 families do *not* have criminal histories, active chemical dependency or alcohol abuse issues or more than one eviction, but they will have one or more of the following barriers:

- — Lack of rental history;
- — New to the area;
- — Large family;
- — One easily explained eviction;
- — History of domestic violence, but the abuser is not in the area;
- — Non-English speaking;
- — No high school diploma;
- — Physical disabilities that affect housing;
- — One parent/child household;
- — Needs financial help moving, furniture, or other household goods;
- — Head of household under age 18; and/or
- — Limited income.

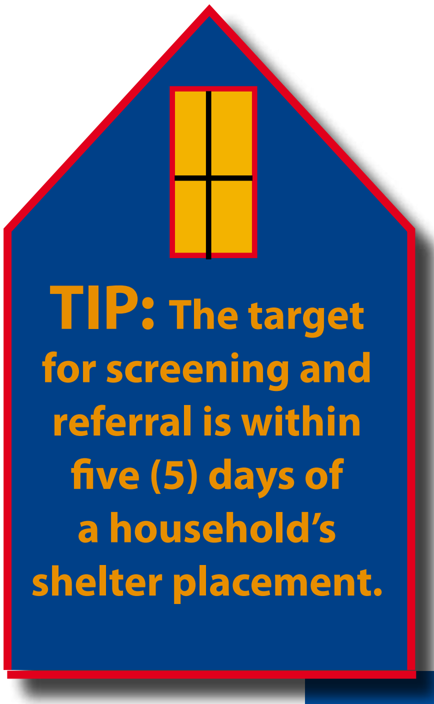
Depending on service availability, Level 2 families may be referred to another agency that provides short-term services.

Level 3: Serious Barriers

Level 3 families may have some barriers listed above as well as some of the following:

- — Poor rental histories that include late payments, lease violations, minor property damage, and up to three evictions;
- — Recently relocation, from an area that is non-responsive to requests for information about criminal or housing histories;
- — Recent minor drug or criminal history;
- — Adults and/or children with mild behavior barriers;
- — Male teenager in the home;
- — Recent domestic violence, and the abuser remains in the area;
- — Recent release from jail;
- — History of substance abuse, though not currently abusing drugs; and/or
- — Open child protection case.

Level 3 families are given an informational packet, a sample rental application and are referred to an agency or other provider with case management or longer-term services. Transitional housing services may be appropriate for some Level 3 families.



Rapid Rehousing Screening Guidelines

Level 4: Long-term Homeless

Level 4 families meet the definition of *Long-term Homelessness*: at least four documented episodes of homelessness in the last three years or one continuous year of homelessness. Most Level 4 families will also have some of the housing barriers described under Levels 3 and 5. They are eligible for any of the services offered.

Level 5: Severe Barriers

These families may have some barriers listed above as well as some of the following:

- — Very poor rental histories that may include judgments for unpaid rent, moderate to serious property damage, serious lease violations and/or four or more evictions;
- — Active chemical dependence or abuse;
- — Adults and/or children with severe behavioral problems;
- — Recent serious criminal history;
- — Current sexual abuse within the family unit; and/or
- — Current domestic violence, with the abuser remaining in the family unit.

Some Level 5 households will be unable to obtain and retain rental housing. Households can be referred to organizations that provide long-term intensive case management and housing services, or that offer relocation assistance to families willing and able to stay with housed relatives.

"My name is Tawanda Thomas. I was staying at the People Serving People Shelter. I wanted a change for me and my two boys - a change for a better life and a better chance. Elim has given me that chance for change. Thank you, Elim for this chance for change."

Through rapid rehousing assistance, Tawanda and her sons now have a permanent place to call home.

Service referrals to rapid rehousing providers are primarily targeted to Level 3 and Level 4 households experiencing similar barriers.

TOOLS

A PLACE TO CALL HOME

Attachment A

ELIM TRANSITIONAL HOUSING

3989 Central Avenue NE, Suite 565
Minneapolis, Minnesota 55421
763/788-1546 FAX: 763/788-1672
Website: elimtransitionalhousing.org E-mail: suewatlovp@aol.com

Screening date: / /20	Screener:	
Referral date: / /20	Agency referral:	Referral staff:
Client's name (Last, First, MI)		
Social Security #:	Birth date:	Age
Race (circle one): White / Black / Hispanic / Native American / Asian / Other / Unknown		
Gender: Male / Female	Annual income:	Source:
Last Zip Code:		
# Preschool Children (0 - 5)	# School-aged children	# Adults
Shelter Name:	Room #:	Shelter admit date: / /20
Length of time in Minnesota in years/months (if less than one month, enter 0): years / months		
Time in Hennepin County in years/months (if less than one month, enter 0): years / months		
Did client previously live in Hennepin County? Yes / No If yes, when (years): to		
Does client have family/friends in Hennepin County? Yes / No		
Has the client been in a shelter before? Yes / No If yes, when? Shelter name:		
Reason client came to Hennepin County: Circle all that apply		
N/A - Current Hennepin County Resident / Employment / Flee Violence / Public assistance		
Other (please describe):		
Barrier Codes: Please circle the FOUR (4) primary codes that apply		
A: EA already used	J: Limited housing available/ Specific problem	S: Limited housing search ability
B: Battering/abuse in home	K: Child's or children's severe behavior problems	T: Male teenager in home
C: Chemical dependency/alcohol	L: Time limited illness/condition	U: Eviction or other rental problems
D: Sexual abuse	M: Mental illness	V: From out of town/state
E: Non-English speaking	N: Large family (5+ children)	W: Left shelter before able to serve
F: Financial help needed	O: Just out of penal institution	X: Application fee paid
G: Limited education (<HS)	P: Conflict prevents youth reunification	Y: Property damage at rental
H: No rental history	Q: Age (youth only) under 18	Z: Other (note)
I: Physical disability	R: Criminal record	
Marital status:		
Reason(s) for homelessness:		

SCREENING TOOLS

RELEVANT HISTORY	
Highest degree of education and date: / /	
GED / Diploma / Associate of Arts / Vo-tech / Bachelors / Masters / PHD	E = Non-English speaking
Other vocational or academic education:	
Certificates or licenses:	
If no diploma, grades completed	
Special education:	
Other notes:	
Behavioral problems:	
ADHD ADD Dyslexia Other:	
Can't read/write/comprehend:	
Child care barrier to education:	
VOCATIONAL HISTORY	
Current or last job:	
Length of time employed: Reason for leaving:	
Quality of work performance:	Rate of pay:
Quality of relationships with coworkers/supervisors:	
Employer or supervisor's name:	Phone #:
Ever fired: Reason:	
Current vocational goals:	
Job/job training:	
Barriers: No job history No ID Childcare Lack of education or job skills Other (list)	
RENT HISTORY	
Previous address:	
Dates resided:	
Reason for leaving:	
Paid rent to:	
Phone #:	
Previous address:	
Dates resided:	
Reason for leaving:	
Paid rent to:	
Phone #:	
Previous address:	
Dates resided:	
Reason for leaving:	
Paid rent to:	
Phone #:	
CREDIT HISTORY: A: EA already used W: Left shelter before able to serve	
Credit problems / Bad checks / Excessive debt / Student loan owed / Foreclosure / Car repo	

SCREENING TOOLS

CHEMICAL HISTORY				
	Last used	Amount	Frequency	
Alcohol				Rule 25 Assessment
Cannabis				C = Chemical dependency
Cocaine				Alcohol / Drugs
Other (name)				
Other (name)				
If chemically dependent, is the client currently sober? Yes No				
Physical symptoms (e.g., blackouts, tremors, DTs)				
Treatment				Detox:
Inpatient / outpatient treatment dates				Completed TX:
Current treatment or AA/NA involvement:				
Longest period of sobriety:				
Motivation for sobriety:				
Consequences of chemical use: DWI		DUI		Fines:
Restitution:	Jail time:		MADD Panel	Other

MENTAL HEALTH			
Inpatient treatment (include dates)			Medications
Outpatient treatment (include dates)			Medications
Current diagnosis (if known)			
Upcoming appointments:	Doctor's name:		Phone #:
M: Mental Illness	Needs meds refill	Counseling	Medication

LEGAL		
Number of adult arrests and charges/convictions		O: Just out of penal institution
Jail or prison sentences:		STS:
# Felonies:	# Misdemeanors:	Outstanding warrants
Lawsuits:		Child support nonpayment
Criminal record in another area (name)		Legal assistance
		UAs required

PHYSICAL HEALTH			
Pregnant Yes	No	Due date	I: Physical disability
Last incidence of abuse:			L: Time-limited illness/condition
Significant pain or illness:			Medications
			Physical needed
Current medications:			Unmet health needs
			Unmet dental needs
Limitations to social / recreational activity:			
Stress / symptom relationship:			
Have you had any significant illness?			

SCREENING TOOLS

NEUROLOGICAL INJURY HISTORY Attachment A		
Have you ever hit our head or been hit on the head? Yes No		
If yes, did you go to the Emergency Room? Yes No		
Did you lost consciousness or become dazed or confused?		
Did you have problems afterward? Yes No Memory issues Difficulty paying attention		
Trouble staying focussed	Headaches	Other
NOTE: If there are two or more positive responses to these questions, the person should be referred to a neuropsychologist and a neurologist for further evaluation of brain injury.		

RELATIONSHIPS		
Current support system: Friends Family Faith community Case manager Other		
Social activities:		
Are any of your family members currently in the area?		
Current primary relationship(s)		Parenting problems
Primary relationship problems		No support system
		No friends in area
Problems with children		Child protection involvement
		-- CPS Worker name:
Current/past significant relationships:		--- CPS Worker phone:
		D: Sexual abuse

FAMILY OF ORIGIN	
Current quality of relationships with family of origin:	
History of abuse (physical, sexual or emotional): Yes No	B: Battering or abuse in home
More information:	D: Sexual abuse
	K: Severe behavior problems among children/siblings
	N: Large family (5+ children)
Brief family history:	P: Conflict prevents youth/family reunification
Chemical dependency/abuse in home: Yes No	T: Male teenager in home
Mental health issues in home: Yes No	
Describe mother and/or father:	
Describe other family members:	
LTH status: One continuous year homeless 4 times in the past 3 years Months	
Case #:	Used bridging: Yes No
Previous month's income (e.g., $800 earned income):	HMIS ID#:
60 months used? Yes No	Time left:
Other program involvement:	Name:
Contact person	Phone
Need identification: Birth certificate Social Security Card DD214 Other	
Refugee Asylee Legal alien Illegal alien	

DREAM SHEET

1. **What are your dreams for you and your family?**

2. **What are your personal and family strengths?**

3. **What are the barriers/issues that may impact your ability to stay housed in the community?**

4. **Short-term goals (1 - 3 months)**

5. **Long-term goals (4 - 24 months)**

A PLACE TO CALL HOME

ELIM TRANSITIONAL HOUSING
3989 Central Avenue NE, Suite 565
Minneapolis, Minnesota 55421
763/788-1546 FAX: 763/788-1672
Website: elimtransitionalhousing.org E-mail: suewatlovp@aol.com

Rapid Rehousing Checklist

GET THE FOLLOWING (COMPLETED) FORMS FROM THE RAPID REHOUSING SCREENER

- ________ Intake form
- ________ Tenant rights test (review with client)
- ________ Releases signed with Rapid Rehousing Screener

COMPLETE THE FOLLOWING FORMS WITH THE CLIENT (check when complete)

- ________ Voter registration form
- ________ Data privacy
- ________ SHP form
- ________ Client information intake form
- ________ Credit check
- ________ Out-of-state credit check
- ________ Dream sheet
- ________ Contract
- ________ Client notes
- ________ Release of information
- ________ Twin Cities Voice Mail
- ________ Application fee
- ________ Check request
- ________ Furniture referral
- ________ Bridging referral
- ________ Hope Movers referral
- ________ Discharge form
- ________ Referral back to screener
- ________ Program evaluation
- ________ Follow-up form
- ________ Change of Address form
- ________ Referral packet
- ________ • Jobs
- ________ • Education
- ________ • Community resources

TIP: Maintain copies of ALL forms in the client's folder.

MANAGEMENT TOOLS

Attachment A

A PLACE TO CALL HOME

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RENT SUBSIDY LETTER TO LANDLORD

Attention: ______________________________

Complex name: ______________________________

Address ______________________________

City, State, Zip: ______________________________

Dear ______________________________,

Elim Transitional Housing, inc. will provide a rent subsidy of $____________per month as a part of our housing program services for:

Client's name: ______________________________

Client's address: ______________________________

Client's City, State, Zip: ______________________________

The rent subsidy will begin / / (date). You will receive the subsidy by the 15th of each month. Elim Transitional Housing will provide a 30-day notice of any change or termination of the above-mentioned client's subsidy.

Please contact us if you have any questions.

Sincerely,

Sue Watlov Phillips, Executive Director

C: Client File; Bookkeeper

Check Payable to:____

Address________________________City__________________State______Zip_____

Tax ID or Social Security #:___________________________W-9 Received__________

Program client is in:______________________County client resides in:____________

Advocate's initials: ______________

MANAGEMENT TOOLS

JOB DESCRIPTION

Job Title: Rapid Rehousing Advocate

Position Purpose: To assist families without homes in Hennepin County-funded shelters to obtain permanent or transitional housing.

Reports to: Executive Director

Specific Responsibilities:

1. Assist 10-12 families per month to exit the shelter within 14 days of intake and to obtain permanent or transitional housing.
2. Coordinate with Hennepin County-funded shelter staff, Hennepin County volunteers and other nonprofit agencies to assist client with obtaining appropriate services, including childcare, transportation, apartment search assistance, moving assistance and other resources needed to transition from shelter to housing.
3. Coordinate with the Administrative Assistant for payment of application fees on behalf of families moving from shelter.
4. Attend biweekly supervisory meetings and monthly staff meetings.
5. Attend monthly Hennepin County Rapid Rehousing meetings.
6. Provide emergency coverage for screener.
7. Assume other duties as assigned and negotiated with the Executive Director.

Hours: Full-equivalent (40 hours/week).

Benefits: See the Staff Salary and Benefit Form.

Minimum Qualifications: Previous experience working with families who have experienced homelessness preferred. People who have experienced homelessness and people of color are encouraged to apply.

Elim Transitional Housing, Inc. is an Equal Opportunity Employer.

The National Coalition for the Homeless

The National Coalition for the Homeless is a network of people who are currently experiencing or who have experienced homelessness, activists, advocates, community-based and faith-based service providers, family members and others committed to ending homelessness. The NCH involves those who are experiencing or who have experienced homelessness in all aspects of its work. The National Coalition for the Homeless (NCH) engages in public education, policy advocacy and grassroots organizing, focusing its efforts in four areas: housing justice, economic justice, health care justice and civil rights.

See the following resources from NCH:

- *Foreclosure to Homelessness 2009: the Forgotten Victims of the Subprime Crisis*
- *Domestic Violence and Homelessness* Factsheet
- *Homeless Families with Children* Factsheet
- *Homeless Youth* Fact Sheet
- Universal Livable Income
- Rural Homeless Assistance Act
- Bring America Home Act

www.nationalhomeless.org

ADDITIONAL RESOURCES

1. Homelessness Resource Exchange: US Department of Housing and Urban Development. www.hudhre.info/HPRP/
2. In February, Congress put nearly $800 billion into an economic recovery package that included $1.5 billion for the Homelessness Prevention and Rapid Re-Housing Program (HPRP). For information about local state-by-state grantees, go to www.hudhre.info/documents/HPRPContactInfoJul09.pdf.
3. Notice of Allocation, application procedures and requirements for HPRP grantees under the American Recovery and Reinvestment Act of 2009: www.hudhre.info/documents/HPRP_Notice_3-19-09.pdf.
4. *Thriving Neighborhoods: Preventing Homelessness in America*. Solutions for America. Pew Partnership Civic Change. www.solutionsforamerica.org/thrivingneigh/homelessness.html.
5. National Low Income Housing Coalition. www.nlihc.org
6. National Health Care for the Homeless Council. www.nhchc.org
7. National Association for the Education of Homeless Children and Youth. www.naehcy.org.
8. Homelessness Resource Center. http://homelessness.samhsa.gov.

Credits

Author Sue Watlov Phillips M.A., CSP, is the Executive Director of Elim Transitional Housing, Inc. and the President of Integrated Community Solutions, Inc. She has been working with people experiencing homelessness for more than 36 years. She is also the current Treasurer and former President of the National and the Minnesota Coalitions for the Homeless. For more information or updates to the Rapid Rehousing Manual, visit www.elimtransitionalhousing.org or contact Ms. Watlov Phillips at suewatlovp@aol.com.

Co-Author Sherri Downing is the Owner and Principle of Sherri Downing Consulting of Helena, Montana. Since 1992, she has focused the bulk of her work on the various social conditions that create and sustain homelessness. She serves on the Board of Directors for the National Coalition for the Homeless, and on the Executive Committee for that Board. For more information, visit www.sherridowning.com or contact Ms. Downing at Consulting@sherridowning.com.

With appreciation to the Elim Transitional Housing HPRP Staff.

HOMELESS: *Having no home or permanent place of residence.*
- Merriam-Webster Dictionary

Attachment A

A PLACE
TO CALL
HOME

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Indiana Housing & Community Development Authority

ESG Rapid Rehousing & Homeless Prevention

Award Manual

Updated October 2013

2013

TABLE OF CONTENTS:

FORMS TO BE UTILIZED:

ESG Client File Checklist Form
Homeless or At Risk Documentation Form
HUD Income Checklist
I HOPE – software site – print out for file
Arizona Matrix Tool – embedded in HMIS
Housing Plan – embedded in HMIS
Coordinated/ Centralized Assessment (will not come out till January 2014)
Income Verification forms – as reference
Rent/ Income / Utilities Calculation Form
Initial Request for Unit Approval
Habitability Standards
Rent Reasonableness Certification from GoSection8 software
Lease Agreements & Copy of Participant's lease
Rental Form Lead Disclosure
Termination & Appeal Policy & Procedure

Indiana Housing Policies and Procedures Manual

The documentation of these policies and procedures promotes the standardization and simplification of requirements and functions and is a reference for sub-recipients that are responsible for the administration of all IHCDA ESG initiatives and funds. The Community Services Department of IHCDA is responsible for coordinating the development of these guidelines to ensure consistency of the information, the coordination of revisions/additions from HUD or IHCDA and the distribution of the information. It is the responsibility of the sub-recipients to disseminate information pertinent to their respective initiatives and to ensure that their staff is aware of, understands, and complies with policies and procedures in this guide.

Summary and Overview

On May 20, 2009, the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act of 2009 was passed into law, which amended and reauthorized the McKinney-Vento Homeless Assistance Act. The Emergency Solutions Grant (ESG) program is one of the primary McKinney-Vento Act programs affected by the HEARTH Act. HUD released interim regulations for ESG in December 2011. The final regulations have not been finalized, so HUD has instructed to utilize these regulations until the final is complete. Some of the primary changes include a change of name to Emergency Solutions Grant (formerly Emergency Shelter Grant), expansion of the definition of homelessness and chronic homelessness, a substantial increase and emphasis on prevention/rapid re-housing resources and greater focus on program performance.

The ESG Program is a categorical grant allocated according to population and other demographic factors to eligible jurisdictions nationwide. IHCDA is the designated recipient for ESG funds directed to the State of Indiana program.

As a result of HEARTH Act changes, IHCDA has created two separate ESG programs, the ESG Shelter Program and the ESG Rapid Re-housing program. The objectives of the Emergency Solutions Grant program is to assist in providing shelter and services for the homeless but also aid in the transition of this population to permanent housing.

The ESG program is designed as the first step in the continuum of assistance to prevent homelessness and to enable the homeless population to move steadily toward independent living. The Continuum of Care model is based on the understanding that homelessness is not caused by simply a lack of shelter, but involves a variety of underlying needs. The fundamental components of a Continuum of Care system are:

- Outreach and assessment to identify homeless person's needs;
- Immediate shelter as a safe, decent alternative to the streets;
- Transitional housing with appropriate supportive services;
- Permanent housing or permanent supportive housing for the disabled homeless.

How is ESG Funding Allocated?

If the recipient is a State, the recipient may use an amount consistent with the restrictions of the program activities (576.100 and § 576.108) to carry out administrative activities through its employees or procurement contracts. The recipient must sub grant the remaining funds in its fiscal year grant to:

(1) Units of general purpose local government in the State, which may include metropolitan cities and urban counties that receive ESG funds directly from HUD; or
(2) Private nonprofit organizations, provided that for emergency shelter activities the recipient obtains a certification of approval from the unit of general purpose local government for the geographic area in which those activities are to be carried out.

The State of Indiana receives a formula amount of ESG funding each year from the U.S. Department of Housing and Urban Development. In order to receive the funds IHCDA submits and obtains approval of a Consolidated Plan. The plan provides the framework for a process used by States to identify housing, homeless, community and economic development needs, and resources to develop a strategic plan to meet those needs. During this planning process, citizens have an opportunity to provide input and to help shape the community's priorities.

The Indiana Housing and Community Development Authority (IHCDA) is responsible for the state's allocation of ESG funding. IHCDA then allocates funds to eligible Sub-recipients. For specific information on IHCDA's allocation of ESG and other formula funding, please review the state's consolidated plan at www.in.gov/ihcda .

SECTION I: DESCRIPTION

The purpose of the ESG is to provide homelessness prevention assistance to households who would otherwise become homeless—many due to the economic crisis—and to provide assistance to rapidly re-house persons who are homeless as defined by section 103 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11302). HUD expects that these resources will be targeted and prioritized to serve households that are most in need of this temporary assistance and are most likely to achieve stable housing, whether subsidized or unsubsidized, outside of ESG after the program concludes.

The ESG is focused on housing for homeless and at-risk households. It provides temporary financial assistance and housing relocation and stabilization services to individuals and families who are homeless or would be homeless *but for* this assistance. The funds under this program are intended to target two populations of persons facing housing instability: 1) individuals and families who are currently in housing but are at imminent 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 ESG is NOT a mortgage assistance program. ESG funds are only eligible to help program participants—whether they are renters or homeowners about to become homeless—pay for utilities, moving costs, security deposits and rent in a new unit, storage fees, and other financial costs or services. ESG funds are not eligible to pay for any mortgage costs or legal or other fees associated with retaining a homeowners' housing.

Grant funds must be used for eligible activities as described in the HUD Notice. There are four categories of eligible activities for the ESG program: Housing Relocation and Stabilization with financial assistance and services, Rental Assistance, HMIS/Data collection and evaluation, and Administrative costs.

These eligible activities are intentionally focused on housing— either financial assistance to help pay for housing, or services designed to keep people in housing or to find housing. Generally, the intent of ESG assistance is to rapidly transition program participants to stability, either through their own means or through public assistance, as appropriate. ESG assistance 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 of households that affect housing stability. Assistance should be focused on housing stabilization, linking program participants to community resources and mainstream benefits, and helping them develop a plan for preventing future housing instability.

All households receiving any form of ESG assistance are to have case management and complete an Initial Assessment. Monthly case management follow-up is required to assure that the household remains housed and is addressing barriers that led to the housing crisis. Individuals with apparent or diagnosed disabilities, e.g. serious mental illness or co-occurring disorders should be served from emergency through stability by separate service providers who will engage with these individuals, provide case management, and oversee support services with a goal of permanent housing and an adequate support network. The development of an individualized Housing Case Plan is an integral part of the Indiana program. Individuals and families served in this initiative will be those who have the most likelihood of becoming stabilized and who would otherwise tend to use the largest percentage of emergency shelter and other emergency resources.

SECTION II: DEFINITIONS, REFERENCE RESOURCES

Certification means a written assertion, based on supporting evidence that must be kept available for inspection by HUD, by the Inspector General of HUD, and by the public. The assertion shall be deemed to be accurate unless HUD determines otherwise, after inspecting the evidence and providing due notice and opportunity for comment.

Consolidated Plan means the plan prepared in accordance with 24 CFR Part 91.

Recipient means the legal entity to which HUD awards an ESG grant and which is accountable for the use of the funds provided. (IHCDA is recipient for ESG state funds).

HMIS means Homeless Management Information System.

HUD means the U.S. Department of Housing and Urban Development.

Private non-profit organization means an organization described in 26 U.S.C. 501(c) that is exempt from taxation under subtitle A of the Internal Revenue Code, has an accounting system and a voluntary board, and practices nondiscrimination in the provision of assistance.

Program participant means an individual or family with or without children that is provided ESG financial assistance or housing relocation and stabilization services through a rapid re-housing or prevention program. In this manual, the term "household" refers to individuals or families.

State means the State of Indiana.

Sub-recipient means any private non-profit organization or unit of general local government to which a sub recipient provides funds to carry out the eligible activities under the grant and which is accountable to the sub recipient for the use of the funds provided. The terms "sub-recipient" and "sub recipient" shall be synonymous for the purposes of this manual.

REFERENCE MATERIALS & RESOURCES

http://www.in.gov/ihcda/	Indiana Housing & Community Development Authority
http://www.hudhre.info/index.cfm?do=viewResource&ResourceID=4517	Emergency Solutions Grant (ESG) Program Interim Regulations
http://www.access.gpo.gov/nara/cfr/cfr-table-search.html	Code of Federal Regulations
http://www.indianahousingoptions.org/home.asp	Indiana Housing Opportunity Planner & Evaluator
http://www.endhomelessness.org	National Alliance to End Homelessness
http://www.hud.gov/offices/fheo/index.cfm	HUD Fair Housing Equal Opportunity Link
http://www.indianahousingnow.org	Indiana Housing Now Search Engine
14.231	Emergency Solutions Grant's Code of Federal

	Domestic Assistance (CFDA) Number
http://www.hud.gov/offices/fheo/promotingfh/928-1.pdf	Equal Housing Opportunity/ Fair Housing Poster
http://www.huduser.org/portal/datasets/fmr.html	HUD Fair Market Rents. Published every October
http://www.gosection8.com/	GoSection8 site for Rent Reasonable requirement

SECTION III: ELIGIBILITY CRITERIA

ESG Rapid Rehousing Eligibility Criteria:

Rapid Re-Housing Assistance may be provided to individuals and families that are homeless under Category 1 or Category 4 of the homeless definition

Rapid Re-housing (576.104):

ESG funds may be used to provide housing relocation and stabilization services and short- and/or medium-term rental assistance as necessary to help a homeless individual or family move as quickly as possible into permanent housing and achieve stability in that housing. This assistance, referred to as rapid re-housing assistance, may be provided to program participants who meet the criteria:

Homeless means: Category 1 or 4 of the homeless definition:

Category 1) An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

(i) An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground;
(ii) An individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs for low income individuals); or (iii) An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation **immediately** before entering that institution;

Category 4) Any individual or family who:
(i) Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence;
(ii) Has no other residence; and
(iii) Lacks the resources or support networks, *e.g.*, family, friends, faith based or other social networks, to obtain other permanent housing.

They also have to be literally homeless (see category 1) See HUD Document: Rapid Rehousing: ESG vs CoC page .

Documentation Requirements:

Category 1:

A signed and dated general certification from an outreach worker verifying that the services are going to homeless persons, and indicates where the persons served reside.

Staff should provide written information obtained from third party regarding the participant's whereabouts, and, then sign and date the statement. Written referral from the agency.

Written verification from the institution's staff that the participant has been residing in the institution for less than 90 days; and information on the previous living situation as being homeless in shelter or streets.

Written verification if available. Self report is okay. Utilize the area on the form for person to self declare.

Category 4:

Acceptable Evidence for Individuals Fleeing Domestic Violence:

Oral statement by the individual or head of household seeking assistance, that is certified by the individual or head of household; and where the safety of the household is not in jeopardy:

Written observation by intake worker; or

Written referral by a housing or service provider, social worker, or other organization from whom the household has sought assistance for domestic violence.

If the individual or family is being admitted to a domestic violence shelter or is receiving services from a victim service provider, the oral statement need only be documented by a certification of the individual or head of household, or by the intake worker.

The purpose of ESG funds for rapid re-housing is to assist eligible program participants to quickly obtain and sustain stable housing. Therefore, sub-recipients providing assistance will utilize 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 ESG.

Program participants who require longer-term housing assistance and services should be directed to programs that can provide the requisite services and financial assistance. In such cases, the ESG may serve as a "bridge" to permanent supportive housing if the housing program has been identified, and is identified as homeless and disabled at time that Rapid Rehousing assistance began.

There is no income threshold to be met with at intake with Rapid Rehousing. Only that they are homeless under these categories.

ESG Homeless Prevention Eligibility Criteria:

Homelessness Prevention (576.103):

Is targeted to individuals and families at risk of homelessness; specifically, this includes those that meet the criteria under the "at risk of homelessness" definition or as well as those who meet the criteria in categories (2), (3), and (4) of the "homeless" definition **AND** have an annual income below **30 percent of family median income for the area.**

Category 2: Individual or family, who will imminently lose their primary nighttime residence, provided that:
1) Residence will be lost within 14 days of the date of application for homeless assistance;
2) No subsequent residence has been identified**; AND**
3) The individual or family lacks the resources or support networks, *e.g.*, family, friends, faith-based or other social networks, needed to obtain other permanent housing;

These may include: At Risk of Homelessness:

a) Has moved because of economic reasons 2 or more times during the 60 days immediately preceding the application for assistance; OR
b) Is living in the home of another because of economic hardship; OR
c) Has been notified that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance; OR
d) Lives in a hotel or motel and the cost is not paid for by charitable organizations or by Federal, State, or local government programs for low-income individuals; OR
e) Lives in an SRO or efficiency apartment unit in which there reside more than 2 persons or lives in a larger housing unit in which there reside more than one and a half persons per room; OR
f) Is exiting a publicly funded institution or system of care; OR
g) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved Con Plan

Category 3) Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:

(i) Are defined as homeless under another federal definition. (Such as: section 387 of the Runaway and Homeless Youth Act (42 U.S.C. 5732a), section 637 of the Head Start Act (42) U.S.C. 9832), section 41403 of the Violence Against Women Act of 1994 (42 U.S.C. 14043e–2), section 330(h) of the Public Health Service Act (42 U.S.C. 254b(h)), section 3 of the Food and Nutrition Act of 2008 (7 U.S.C. 2012), section 17(b) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)) or section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a**); AND**
(ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance
(iii) Have experienced persistent instability as measured by two moves or more during in the preceding 60 days; AND
(iv) Can be expected to continue in such status for an extended period of time due to special needs or barriers. Has one or more of the following chronic disabilities:
chronic physical or
mental health conditions
substance addiction histories of domestic violence or childhood abuse
child with a disability
two or more barriers to employment, which include: lack of a high school degree or GED, illiteracy, low English proficiency, history of incarceration or detention for criminal activity, history of unstable employment

Category 4) Any individual or family who:

(i) Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence;
(ii) Has no other residence; **and**
(iii) Lacks the resources or support networks, *e.g.*, family, friends, faith based or other social networks, to obtain other permanent housing.

And with these possible housing risk criteria, the family median household income must be at 30% or lower median income to qualify for HP funds.

Documentation Requirements:

Category 2:

At least one of the following stating that the household must leave within 14 days:

A court order resulting from an eviction notice or equivalent notice, or a formal eviction notice;

For individuals in hotels or motels that they are paying for, evidence that the individual or family lacks the necessary financial resources to stay for more than 14 days; or

An oral statement by the individual or head of household stating that the owner or renter of the residence will not allow them to stay for more than 14 days.

The intake worker must verify the statement either through contact with the owner or renter, or documentation of due diligence in attempting to obtain such a statement.

Certification by the individual or head of household that no subsequent residence has been identified.

Self-certification or other written documentation that the individual or head of household lacks the financial resources and support networks to obtain other housing.

Category 3:

A nonprofit, state, or local government entity that administers the other federal statute must certify that household qualifies as homeless under that statute's definition.

To document that the individual has not had a lease, occupancy agreement, or ownership interest in housing in the last 60 days, certification by the individual or head of household, written observation by an outreach worker, or referral by a provider.

To document that the individual or family has moved two times in the past 60 days, a certification from the individual and supporting documentation, including records or statements from each owner or renter of housing, shelter or housing provider, or social worker, case worker, or appropriate official of an institution where the individual or family resided. Where these statements are unobtainable, the intake worker should include a written record of his or her due diligence in attempting to obtain them.

Evidence of barriers includes: Written diagnosis from a licensed professional, employment records, department of corrections records, literacy, and English proficiency tests.

For disability, any of the above, written verification from the Social Security Administration (or a disability check receipt), or observation of the intake worker of disability, which must be confirmed within 45 days by an appropriate professional.

Category 4:

Acceptable Evidence for Individuals Fleeing Domestic Violence:

Oral statement by the individual or head of household seeking assistance, that is certified by the individual or head of household; and Where the safety of the household is not in jeopardy:

Written observation by intake worker; or

Written referral by a housing or service provider, social worker, or other organization from whom the household has sought assistance for domestic violence.

If the individual or family is being admitted to a domestic violence shelter or is receiving services from a victim service provider, the oral statement need only be documented by a certification of the individual or head of household, or by the intake worker.

It can be more challenging to identify persons who are housed but who have a very high risk of becoming homeless. There are many people who are housed and have great need but would not become homeless if they did not receive assistance. Sub-recipients are encouraged to target prevention assistance to those individuals and families at the greatest risk of becoming homeless.

The costs of homelessness prevention are only eligible to the extent that the assistance is necessary to help the program participant regain stability in the program participant's current permanent housing or move into other permanent housing and achieve stability in that housing. Homelessness prevention must be provided in accordance with the housing relocation and stabilization services requirements in 576.105, the short-term and medium-term rental assistance requirements in 576.106, and the written standards and procedures established under 576.400.

HUD requires sub-recipients to evaluate and certify the **eligibility of program participants at least once every 3 months for all persons receiving medium-term rental assistance or other ESG assistance.** Similarly, sub-recipients should carefully assess a household's need and appropriateness for ESG assistance. If the household needs more intensive supportive services or long-term assistance than the sub-recipient can provide, or if a household is not at risk of imminent homelessness, sub-recipients must work to link them to other appropriate available resources.

SECTION IV: HOUSING RELOCATION & STABILITATION SERVICES

1. Housing Relocation & Stabilization: Financial Assistance

Financial assistance is limited to the following activities:

Rental application fees: ESG funds may pay for the rental housing application fee that is charged by the owner to all applicants

Security deposits: ESG funds may pay for a security deposit that is equal to no more than 2 months' rent.

In contrast to the requirements regarding rental assistance payments, security and utility deposits covering the same period of time in which assistance is being provided through another housing subsidy program are eligible, as long as they cover separate cost types. One example of this would be providing a security deposit for a participant receiving a HUD VA Supportive Housing (VASH) voucher, which provides rental assistance and services.

Last month's rent. If necessary to obtain housing for a program participant, the last month's rent may be paid from ESG funds to the owner of that housing at the time the owner is paid the security deposit and the first month's rent. This assistance must not exceed one month's rent and must be included in calculating the program participant's total rental assistance, which cannot exceed 24 months during any 3-year period.

Utility deposits: ESG funds may pay for a standard utility deposit required by the utility for all customers for the utilities listed under the utility payment section.

Utility payments: *Utility payments.* ESG funds may pay for up to 24 months of utility payments per program participant, per service, including up to 6 months of utility payments in arrears, per service a partial payment of a utility bill counts as one month. This assistance may only be provided if the program participant or a member of the same household has an account in his or her name with a utility company or proof of responsibility to make utility payments. Eligible utility services are gas, electric, water, and sewage. No program participant shall receive more than 24 months of utility assistance within any 3-year period.

Moving cost assistance: ESG funds may pay for moving costs, such as truck rental or hiring a moving company. This assistance may include payment of temporary storage fees for up to 3 months, provided that the fees are accrued after the date the program participant begins receiving assistance for services (housing search & placement and/or case management) and before the program participant moves into permanent housing. Payment of temporary storage fees in arrears is not eligible.

IHCDA Requirement: If accessing moving/storage services, the sub-recipient must document in detail the circumstances surrounding the need to access these services, include monthly fees that will be charged and the dates in which the services will be accessed. In addition, Sub-recipient staff should take an active role in assisting the participant in finding reasonably priced vendors for this service.

2. Housing Relocation & Stabilization: Service Costs

Subject to the general restrictions under the homeless definitions of homeless prevention and rapid rehousing, 576.103 and 576.104, ESG funds may be used to pay the costs of providing the following services:

a. Housing Search and Placement

ESG funds may be used for services or activities designed to assist individuals or families in locating, obtaining, and retaining suitable permanent housing include the following:

1) Assessment of housing barriers, needs, and preferences;
2) Development of an action plan for locating housing;
3) Housing search;
4) Outreach to and negotiation with owners;
5) Assistance with submitting rental applications and understanding leases;
6) Assessment of housing for compliance with Emergency Solutions Grant (ESG) requirements for habitability, lead-based paint, and rent reasonableness;
7) Assistance with obtaining utilities and making moving arrangements
8) Tenant counseling.

IHCDA Requirement: Utilize Go Section8 software used for determination of rent reasonableness. Site: http://www.gosection8.com/

b. Housing Stability Case Management

ESG funds may be used to pay cost of assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability for a program participant who resides in permanent housing or to assist a program participant in overcoming immediate barriers to obtaining housing. This assistance cannot exceed 30 days during the period the program participant is seeking permanent housing and cannot exceed 24 months during the period the in permanent housing. Component services and activities consist of:

1) Using the centralized or coordinated assessment system as required under § 576.400(d), to evaluate individuals and families applying for or receiving homelessness prevention or rapid re-housing assistance;
2) Conducting the initial evaluation required under § 576.401(a), including verifying and documenting eligibility, for individuals and families applying for homelessness prevention or rapid rehousing assistance;
3) Counseling;
4) Developing, securing, and coordinating services and obtaining Federal, State, and local benefits;
5) Monitoring and evaluating program participant progress;
6) Providing information and referrals to other providers;
7) Developing an individualized housing and service plan, including planning a path to permanent housing stability; and
8) Conducting re-evaluations required under § 576.401(b).

c. <u>Mediation:</u>

ESG funds may pay for mediation between the program participant and the owner or person(s) with whom the program participant is living, provided that the mediation is necessary to prevent the program participant from losing permanent housing in which the program participant currently resides.

d. <u>Legal Services:</u>

ESG funds may pay for legal services, as set forth in § 576.102(a)(1)(vi), except that the eligible subject matters also include landlord/tenant matters, and the services must be necessary to resolve a legal problem that prohibits the program participant from obtaining permanent housing or will likely result in the program participant losing the permanent housing in which the program participant currently resides.

e. <u>Credit Repair:</u>

ESG funds may pay for credit counseling and other services necessary to assist program participants with critical skills related to household budgeting, managing money, accessing a free personal credit report, and resolving personal credit problems. This assistance does not include the payment or modification of a debt.

3. <u>Maximum Amounts and Periods of Assistance:</u>

The recipient may set a maximum dollar amount that a program participant may receive for each type of financial assistance under financial assistance (1) of this section. The recipient may also set a maximum period for which a program participant may receive any of the types of assistance or services under this section. However, except for housing stability case management, the total period for which any program participant may receive the services under service costs paragraph (2) of this section **must not exceed 24 months during any 3-year period.** The limits on the assistance under this section apply to the total assistance an individual receives, either as an individual or as part of a family.

4. <u>Use of Other Subsidies</u>:

Financial assistance under paragraph (a) of this section cannot be provided to a program participant who is receiving the same type of assistance through other public sources or to a program participant who has been provided with replacement housing payments under the URA, during the period of time covered by the URA payments.

SECTION V RENTAL ASSISTANCE

A) General Provisions subject to the general conditions under homeless prevention and rapid rehousing (576.103 and § 576.104), the recipient or sub recipient may provide a program participant with up to 24 months of rental assistance during any 3-year period. This assistance may be short-term rental assistance, medium-term rental assistance, payment of rental arrears, or any combination of this assistance.

(1) Short-term rental assistance is assistance for up to 3 months of rent.
(2) Medium-term rental assistance is assistance for more than 3 months but not more than 24 months of rent.
(3) Payment of rental arrears consists of a one-time payment for up to 6 months of rent in arrears, including any late fees on those arrears.
(4) Rental assistance may be tenant based or project-based

IHCDA is ONLY Funding Tenant Based Assistance

B) *Discretion to set caps and conditions.* Subject to the requirements of this section, the recipient may set a maximum amount or percentage of rental assistance that a program participant may receive a maximum number of months that a program participant may receive rental assistance, or a maximum number of times that a program participant may receive rental assistance. The recipient may also require program participants to share in the costs of rent.

IHCDA has capped ESG rental assistance at 12 months.

Even though IHCDA has put a limit on 12 months of rental assistance, the one-time payment of 6 months of allowed rental arrears is still allowed and is the HUD maximum allowed. So basically the most a person could receive with ESG State is 18 months. The maximum allowed by HUD is no more than 24 months.

(C) *Use with other subsidies.* Except for a one-time payment of rental arrears on the tenant's portion of the rental payment, rental assistance cannot be provided to a program participant who is receiving tenant-based rental assistance, or living in a housing unit receiving project-based rental assistance or operating assistance, through other public sources. Rental assistance may not be provided to a program participant who has been provided with replacement housing payments under the URA during the period of time covered by the URA payments.

D) *Rent Restrictions*. Rental assistance cannot be provided if it exceeds the Fair Market Rent established by HUD, as provided under 24 CFR part 888, and complies with HUD's standard of rent reasonableness, as established under 24CFR 982.507.

Rent must meet rent reasonableness standards and CANNOT EXCEED HUD's published FMRs for the area. In some communities, the reasonable rent for a specific unit may be lower than the FMR that has been established for the community.

Bottom line: The rent for the unit assisted with ESG funds must not exceed the lesser of the FMR or the rent reasonableness standard.

For purposes of calculating rent under this section, the rent shall equal the sum of the total monthly rent for the unit, any fees required for occupancy under the lease (other than late fees and pet fees) and, if the tenant pays separately for utilities, the monthly allowance for utilities (excluding telephone) established by the public housing authority for the area in which the housing is located.

IHCDA requires that our Utility Allowance be utilized. They come out annually (May or June). They are located on our website at: http://www.in.gov/myihcda/2430.htm

Rental Assistance Agreements and Lease issues

E) *Rental assistance agreement.* The sub recipient can make rental assistance payments only to an owner with whom the sub recipient has entered into a rental assistance agreement. The rental assistance agreement must set forth the terms under which rental assistance will be provided, including the requirements that apply under this section. The rental assistance agreement must provide that, during the term of the agreement, the owner must give the sub recipient a copy of any notice to the program participant to vacate the housing unit, or any complaint used under state or local law to commence an eviction action against the program participant.

F) *Late payments.* The sub recipient must make timely payments to each owner in accordance with the rental assistance agreement. The rental assistance agreement must contain the same payment due date, grace period, and late payment penalty requirements as the program participant's lease. The sub recipient is solely responsible for paying late payment penalties that it incurs with non-ESG funds.

G) *Lease.* Each program participant receiving rental assistance must have a legally binding, written lease for the rental unit, unless the assistance is solely for rental arrears. The lease must be between the owner and the program participant. Where the assistance is solely for rental arrears, an oral agreement may be accepted in place of a written lease, if the agreement gives the program participant an enforceable leasehold interest under state law and the agreement and rent owed are sufficiently documented by the owner's financial records, rent ledgers, or canceled checks.

IHCDA recommends only providing rental arrears with having a copy of the lease.

For program participants living in housing with project-based rental assistance under paragraph (i) of this section, the lease must have an initial term of one year.

IHCDA is only providing ESG for Tenant based rental assistance.

H) *Tenant-based rental assistance.*

1) A program participant who receives tenant-based rental assistance may select a housing unit in which to live and may move to another unit or building and continue to receive rental assistance, as long as the program participant continues to meet the program requirements.

2) The recipient may require that all program participants live within a particular area for the period in which the rental assistance is provided.

3) The rental assistance agreement with the owner must terminate and no further rental assistance payments under that agreement may be made if:

i) The program participant moves out of the housing unit for which the program participant has a lease;

ii) The lease terminates and is not renewed; or

iii) The program participant becomes ineligible to receive ESG rental assistance.

In general, the ESG Homeless Prevention Activity will offer rental assistance at 3 month intervals –ESG State approves **up to 12 months if needed.** The Rapid Re-Housing Program will offer rental assistance up to **maximum of 12 months where the reevaluations are not required until 12 months are completed.**

Rental assistance payments cannot be made on behalf of 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. IHCDA understands this prohibition to extend to any form of public rental support but not to rental units deemed "affordable" by virtue of a Low Income Housing Tax Credit set aside.

Ineligible and Prohibited Activities:

The intent of ESG is to provide funding for housing expenses to persons who are homeless or who would be homeless if not for this assistance. Therefore, financial assistance or services to pay for expenses that are available through other programs, including child care and employment training, are not eligible. Case managers should work to link program participants to these other resources.

Financial assistance may not be used to pay for any mortgage costs or costs needed by homeowners to assist with any fees, taxes, or other costs of refinancing a mortgage to make it affordable. This prohibition extends to land contracts and "rent to own" situations in which the householder has a legal interest in the property.

ESG funds may not be used to pay for any of the following items:
construction or rehabilitation;
credit card bills or other consumer debt;
car repair or other transportation costs;
travel costs;
food;
medical or dental care and medicines;
clothing and grooming;
home furnishings;
pet care;
entertainment activities;
work or education related materials;
and cash assistance to program participants.

Programs may not charge fees to ESG program participants. Any ESG funds used to support program participants must be issued directly to the appropriate third party, such as the landlord or utility company, and in no case are funds eligible to be issued directly to program participants.

If funds are found to be used for ineligible activities as determined by HUD, the sub recipient and/or sub-recipients will be required to reimburse HUD.

Sub recipients and sub-recipients must not make payments directly to program participants, but only to third parties, such as landlords or utility companies.

In addition, an assisted property may not be owned by the sub recipient, sub-recipient or the parent, subsidiary or affiliated organization of the sub-recipient.

ESG funds may not be used to move an individual or family into a transitional housing program, nor may the funds be used to assist persons while residing in a transitional housing program.

SECTION VI: HMIS COMPONENT DATA COLLECTION & EVALUATION

The Homeless Management Information System ("HMIS") is a secure, confidential electronic data collection system used to determine the nature and extent of homelessness. **The sub recipient is required to enter data into HMIS on a regular and consistent basis,** which is defined as data entry within **two weeks from the time of intake and discharge**. IHCDA will regularly monitor HMIS usage to verify consistent data entry for applicable shelters.

Data must be entered for the ESG funded programs serving homeless individuals and families. The data required for entry into HMIS includes the following data elements: Name, Social Security Number, Date of Birth, Ethnicity, Race, Gender, Veteran Status, Disabling Condition, Residence Prior to Program Entry, Zip Code, Length of Stay at Previous Residence and Homeless Cause. While domestic violence shelters are exempt from the HMIS requirement, they are required to maintain records of the above mentioned data elements in a separate, confidential system. Domestic violence shelters and DV transitional housing programs must collect client-level data in a comparable database, which collects all of the HMIS universal data elements listed in this paragraph and generates unduplicated aggregate reports. The HMIS system is used to report to HUD on an annual basis and to aid in local and statewide policy and planning.

Failure to enter data on a regular and consistent basis may result in the termination of the ESG contract.

Each sub-recipient will be provided with the necessary tools and training for entering participant data into HMIS on an at least weekly basis. Sub-recipients also will be required to submit monthly and annual reports with information about the number of participants served, the kinds of services provided, and the amount of money spent on each kind of services.

All sub-recipients will be required to meet the following minimum standards for HMIS/ESG data collection and reporting;

Sub-recipients must enter into a HMIS/ESG Agency Participation Agreement and attend User training if they have not already attended.

All sub-recipient staff that participates in ESG eligible activities must have regular and convenient access to a computer with a high speed Internet connection.

All sub-recipient staff that participates in ESG eligible activities must have a unique assigned user name and password that they can access regularly during work hours. Each such user must sign a Code of Ethics statement prior to receipt of their log in and password.

ESG HMIS Requirements

(a) *Eligible costs.*

(1) The recipient or sub recipient may use ESG funds to pay the costs of contributing data to the HMIS designated by the Continuum of Care for the area, including the costs of:

(i) Purchasing or leasing computer hardware;
(ii) Purchasing software or software licenses;
(iii) Purchasing or leasing equipment, including telephones, fax machines, and furniture;
(iv) Obtaining technical support;
(v) Leasing office space;

(vi) Paying charges for electricity, gas, water, phone service and high-speed data transmission necessary to operate or contribute data to the HMIS;

(vii) Paying salaries for operating HMIS, including:

(A) Completing data entry;

(B) Monitoring and reviewing data quality;

(C) Completing data analysis;

(D) Reporting to the HMIS Lead;

(F) Training staff on using the HMIS or comparable database; and

(G) Implementing and complying with HMIS requirements;

(viii) Paying costs of staff to travel to and attend HUD-sponsored and HUD approved training on HMIS and programs authorized by Title IV of the McKinney-Vento Homeless Assistance Act;

(ix) Paying staff travel costs to conduct intake

(b) *General restrictions.* Activities funded under this section must comply with HUD's standards on participation, data collection, and reporting under a local HMIS.

SECTION VII ADMINISTRATIVE COSTS

The recipient (IHCDA) may use up to 7.5 percent of its ESG grant for the payment of administrative costs related to the planning and execution of ESG activities.

Sharing requirement States. If the recipient is a State, the recipient may share its funds for administrative costs with its sub recipients that are private nonprofit organizations.

IHCDA shares some of the Administrative costs with ESG RR and ESG HP sub recipients.

This does not include staff and overhead costs directly related to carrying out activities eligible under the program components of HP and RR – financial assistance, case management, housing search, etc. (576.101 through § 576.107), because those costs are eligible as part of those activities. Eligible administrative costs include:

(1) *General management, oversight: and coordination:* Costs of overall program management, coordination, monitoring, and evaluation. These costs include, but are not limited to, necessary expenditures for the following:

(i) Salaries, wages, and related costs of the recipient's staff, the staff of sub recipients, or other staff engaged in program administration. In charging costs to this category, the recipient may either include the entire salary, wages, and related costs allocable to the program of each person whose *primary* responsibilities with regard to the program involve program administration assignments, or the pro rata share of the salary, wages, and related costs of each person whose job includes *any* program administration assignments. The recipient may use only one of these methods for each fiscal year grant. Program administration assignments include the following:

(A) Preparing program budgets and schedules, and amendments to those budgets and schedules;

(B) Developing systems for assuring compliance with program requirements;

(C) Developing interagency agreements and agreements with sub recipients and contractors to carry out program activities;

(D) Monitoring program activities for progress and compliance with program requirements;

(E) Preparing reports and other documents directly related to the program for submission to HUD;

(F) Coordinating the resolution of audit and monitoring findings;

(G) Evaluating program results against stated objectives; and

(H) Managing or supervising persons whose primary responsibilities with regard to the program include such assignments as those described in paragraph (a)(1)(i)(A) through (G) of this section. Services, accounting services, and audit services; and Other costs for goods and services required for administration of the program, including rental or purchase of equipment, insurance, utilities, office supplies, and rental and maintenance (but not purchase) of office space.

SECTION VIII PROCEDURE & PROGRAM REQUIREMENTS

Requirements for All ESG RR & HP Program Participants

Coordination with other targeted homeless services. The recipient and its sub recipients must coordinate and integrate, to the maximum extent practicable, ESG-funded activities with other programs targeted to homeless people in the area covered by the Continuum of Care or area over which the services are coordinated to provide a strategic, community-wide system to prevent and end homelessness for that area. These programs include: Permanent Supportive Housing Programs, HUD VASH programs, Education for Homeless Children, Health Care, Domestic Violence agencies, Health Care for Homeless Veterans, Youth and Runaway programs, etc.

System and program coordination with mainstream resources. The recipient and its sub recipients must coordinate and integrate, to the maximum extent practicable, ESG funded activities with mainstream housing, health, social services, employment, education, and youth programs for which families and individuals at risk of homelessness and homeless individuals and families may be eligible.

Sub-recipient staff will actively visit and/or contact homeless shelters and any other known areas where individuals who meet program eligibility requirements may be found in the community with a goal of engagement and admittance to the Program. Sub-recipient staff will work closely with community agencies to build collaborative relationships and to become familiar with how to access available services for participants efficiently and effectively. Further, sub-recipient staff will be responsible for developing a matrix of available resources in their community to use as a tool in directing participants to the appropriate agencies in order to prioritize and access services they need.

Program Criteria Eligibility Assessment for RR and HP

Eligibility Intake Criteria: The sub recipient must conduct an initial evaluation to determine the eligibility of each individual or family's eligibility for ESG assistance and the amount and types of assistance the individual or family needs to regain stability in permanent housing. Sub-recipient staff will conduct an initial intake interview with participants using a standardized assessment to verify program eligibility and assess the type of housing the participant may need.

- *For Rapid Rehousing: Utilize Homeless Documentation Form*

-*For Homeless Prevention: Utilize Homeless Prevention Documentation Form & Income Standard*

See Documentation Requirements under Section III:

Complete IHOPE Assessment

- Each agency must complete an I-HOPE initial screening (www. indianahousingoptions.org) screening with the client. It is the initial assessment intake not used as eligibility tool, but referral tool. Use to screen in, not screen out.

IHCDA requires that each recipient of ESG assistance, have a completed assessment; a face-to-face interview that compiles the required information for the HMIS.

Assessments must be conducted directly with the applicant householder, not a proxy or family member. If language or disability interferes with the assessment, it is the responsibility of the sub-recipient to provide or arrange for interpreters or other accommodation, e.g. TTY. On site monitoring will include inspection of case files for the Arizona Matrix Tool has been completed.

- Assessment: I-Hope: www.indianahousingoptions.org
- Arizona Matrix Self Sufficiency Tool: embedded in HMIS.

Complete the Arizona Matrix Tool – The Arizona Self Sufficiency Matrix Tool is a case management tool to assist with overall assessment of client needs, program planning, performance measurement and staff supervision. This matrix tool is to be completed by qualified case managers who have training and/or education in structured interviewing and the obtaining of personal information in a sensitive and appropriate manner. The tool is embedded in HMIS**.**

This tool provides a concrete number of how persons are progressing out of shelter into stabilized housing and while being housed how they are becoming more self-sufficient. It points out the highest barriers that need to be addressed to help stabilize the housing that leads to case management goals of the housing plan. It provides a focus for the case manager and the participant.

Coordinated Access Assessment:

Coordinated Access Assessment. HUD has required that all Continuum of Care have a Coordinated Access Assessment that all projects and agencies who serve homeless persons to utilize as the first step into the system. This is to be utilized by all types of programs that would include: Safe Havens, Day Shelters, Emergency Shelters, Transitional Housing, Permanent Housing like Rapid Rehousing, ESG Homeless Prevention and Permanent Supportive Housing and Shelter Plus Care Programs Legacy projects.

Once the Continuum of Care has developed a coordinated assessment every ESG funded program or project within the BOS Continuum of Care's area must use that assessment system. The sub recipient must work with the BOS Continuum of Care to ensure the screening, assessment and referral of program participants are consistent with the written standards required.

> **The Steering Committee is currently working on Centralized/Coordinated Access Assessment that will be imbedded in HMIS software. Continue to utilize assessments that we have recommended and utilize your current Regional Coordinated Access system until this new assessment and coordination has been implemented. The new assessment will be embedded in HMIS/Client Track system by January 2014.**
>
> **Once this assessment is launched and utilized, the IHOPE will no longer be necessary and required.**

Habitability:

Sub-recipients are required to conduct a habitability standards inspection on any unit that a participant will be receiving ANY ESG financial assistance such as any rental assistance, security deposit, last month's deposit, utility deposit, moving costs. Sub-recipients must certify that the unit has passed habitability standards before any ESG funds may be released. In addition, an annual habitability standards inspection must be conducted for any unit in which ESG funds are being used. **Utilize the Habitability Standards Form**

Rent Reasonableness

Sub-recipients must ensure that ESG funds used for rental assistance do not exceed the actual rental cost, which must be in compliance with HUD's standard of "rent reasonableness." "Rent reasonableness" means that the total rent charged for a unit must be reasonable in relation to the rents being charged during the same time period for comparable units in the private unassisted market and must not be in excess of rents being charged by the owner during the same time period for comparable non-luxury unassisted units.

> **IHCDA Requirement: Utilize GoSection8 Software to receive rent reasonable checklist. It is free to utilize:** http://www.gosection8.com/

Fair Market Rent: The unit must be at or below Fair Market Rent. Utilize the HUD Fair Market Rent website: http://www.huduser.org/portal/datasets/fmr.html

Tenant Rent Calculation

The tenant portion of rent is calculated on the basis of allowable household income. In general, a participant who claims a zero income will not be appropriate for the ESG unless there is a clear recent loss of income and an expected return to income production in the near future. Persons with no income over a long period of time may be seen as having substantial barriers to housing stability and assisted in accessing long term housing alternatives.

> Tenant's portion of the rent is paid directly to the landlord and is subject to the same timeliness requirements as the overall rent. In other words, failure to pay the tenant portion of the rent for an ESG assisted unit can be reason for eviction.
>
> **IHCDA furnishes a spreadsheet which automatically calculates tenant rents once pertinent information is entered. Utilize the Rent Calculation Form.**

Utility payments:

ESG funds may be used for up to 24 months of utility payments per program participant, including 6 months of utility payments in arrears, per service. A partial payment of utility bill counts as one month. Utility payments must not be paid in situations where the standard practice of the landlord is to include utility costs in the rent. See Section IV for more information on the requirements.

Sub-recipients must obtain proof that a participant or a household member has a utility account in his/her name or proof of responsibility to make utility payments such as cancelled checks or receipts in his/her name from a utility company before utility payments are approved and released on behalf of the participant. Copies of the proof of responsibility should be obtained and maintained in the participant file. Utility payments may co-occur with rental assistance when the lease does not include utilities.

Utilize utility allowance as a guide of the amount of utilities can be paid. See IHCDA website for

current allowance in the county. These change annually around May or June. http://www.in.gov/myihcda/2430.htm

Once a unit is determined to meet the FMR and rent reasonableness requirements, ESG funds may be **used to pay for the actual utility costs**. The utility allowance calculation is only used to determine whether the unit meets the FMR standard

Re-evaluations for homelessness prevention and rapid re-housing assistance.

(1**) Homeless Prevention**: The sub recipient must **re-evaluate the program participant's eligibility** and the types and amounts of assistance the program participant needs not less than **once every 3 months for program participants receiving homelessness prevention assistance.**

i) The program participant does not have an annual income that exceeds 30 percent of median family income for the area, as determined by HUD; and
ii) The program participant lacks sufficient resources and support networks necessary to retain housing without ESG assistance.

Rapid Re-housing assistance, it **should be re-evaluated annually**. At a minimum, each re-evaluation of eligibility must establish that:

I**HCDA has put a cap of only 12 months of assistance for rapid rehousing and homeless prevention. For rapid rehousing there is no annual recertification since it is once a year requirement.**

- If during case management, there is information provided that they have increased their income, prior to the 1 year, they are not discharged from program due to increase of income. They can continue to stay on program. Recommend annual reevaluations as intended by HUD for Rapid Rehousing

- **If client loses income suddenly, reevaluate income again for their 30% adjusted gross income share.**

(2) The sub recipient may require each program participant receiving homelessness prevention to notify the recipient or sub recipient regarding changes in the program participant's income or other circumstances (*e.g.*, changes in household composition) that affect the program participant's need for assistance under ESG. When notified of a relevant change, the recipient or sub recipient must re-evaluate the program participant's eligibility and the amount and types of assistance the program participant needs.

Housing Stability Case Management:

1) While providing homelessness prevention or rapid rehousing assistance to a program participant, the sub recipient must:

(i) The sub recipient is required to provide and the participant is required to meet with a case manager not less than once per month to assist the program participant in ensuring long-term housing stability; and

(ii) Develop a plan to assist the program participant to retain permanent housing after the ESG assistance ends, taking into account all relevant considerations, such as the program participant's current or expected income and expenses; other public or private assistance for which the program participant will be eligible and likely to receive; and the relative affordability of available housing in the area.

(iii) Utilize the Arizona Self Sufficiency Matrix Tool as a guide for the participants goals within their housing plan. The Arizona Tool is embedded in HMIS.

Housing Plan:

The ESG program uses standardized Housing Case Management Plans. There are two basic forms of the Plan. The Homeless Prevention Phase Plan is intended for households which receive prevention assistance in an effort to maintain their present housing. The Rapid Re-Housing Phase Plan is aimed at households who already experiencing homelessness.

The Housing Plan must be completed and placed in the participant file. The Housing Plan Form is embedded in HMIS. The Plan is a tool that will be used to assess and develop a strategy to achieve participant stability within the timeframe established by program regulations.

Utilize the information from the Arizona Matrix Tool to provide guidance on what goals should be targeted to provide self -sufficiency.

Additionally, the Plan must be used to actively assist participants in meeting established outcomes based upon individual participant need. The Plan should be referenced, revised and updated regularly throughout a participant's participation in the program. Either plan may address short term or intermediate term (up to 12 months) goals which are directly tied to the household's ability to recover and/or maintain housing stability.

All goals are to be written in observable and concrete terms, e.g.

> "Will increase household income-- through part-time employment of spouse" or;
>
> "Will obtain access to transportation – by relocating to apartment close to bus route" – with the first portion the goal and the remainder an example of an objective.
>
> All goal statements should include specific objectives, which may be understood as "way points" in reaching the goal.

Typically, objectives may be added to the Housing Plan as the participant achieves each "step" but it is also allowable for the case manager and the participant to outline all the objectives when formulating a goal. This can give a participant a "road map" to follow in achieving a mutually agreed upon goal. Goals are not realistic unless they are understood by and accepted by the ESG participant. Interventions are services or direct assistance that will facilitate the participant in reaching the goal.

Form: ESG Housing Plan: Prevention: embedded in HMIS

Form: ESG Housing Plan: Rapid Re-Housing: embedded in HMIS

A. Rapid Rehousing Program Requirements ONLY:

Items that must be completed:

The Rapid Re-Housing Program will offer rental assistance up to maximum of 12 months. IHCDA requires that rental assistance only be rendered when a valid and compliant lease exists between the landlord and the resident, with the leaseholder eligible to the full recourse of the law.

Lead Based Paint Poisoning Act requirements must be met when applicable based upon participant household composition, i.e. a child under the age of 6. (Addendum O: Rental Form Lead Disclosure Form)

Sub-recipients will work closely with program participants to locate a rental unit. When a rental unit has been located, sub-recipients will assist the participant in contacting the landlord to complete the appropriate paperwork and conduct a habitability standards inspection

In order to provide rental assistance for a new, to be occupied unit, the following steps must be completed:

- An Initial Request for Unit**. (Utilize the Initial Request Form from IHCDA**) is furnished to the eligible participant and used in selecting a potential housing option. This form allows the participant and potential landlord to exchange information and is completed at the time of resident application for a lease.

- Once the unit is inspected and the rent determined to be reasonable, the tenant rent calculation is completed, based on 30% of the household's income. Rent, Income and Utilities Calculation.

IHCDA Form: Rental Calculation Form.

- All supported leases must contain the required elements: including a term of at least one year, designation of eligible household members and description of included utilities. See Section V for more rental agreement information.

B. Homeless Prevention Program Requirements ONLY

Income Eligibility Requirement: A participant must be at or below 30% of Area Median Income (AMI) as defined in the U.S. Department of Housing and Urban Development's (HUD). Sub recipients will complete income verification forms and submit appropriate income sources for 3rd party verification. Completed income verifications should be placed in the participant file.

ESG Homeless Prevention Activity will offer rental assistance at 3 month intervals with income updates at the 3 month period where the participant's annual income **must be below 30% median family income to be eligible for next 3 months** of assistance.

IHCDA requires that rental assistance only be rendered when a valid and compliant lease exists between the landlord and the resident, with the leaseholder eligible to the full recourse of the law.

IHCDA posts area median income levels on its website for use by ESG providers (www.ihcda.in.gov) See IHCDA Sample of Income Verification: Form

FILE DOCUMENTATION/CONTENTS: Initial Eligibility

If a participant is found to be eligible and appropriate for the program after the initial interview, certain documents must be obtained and placed in the participant file. These include:

1. Homeless or Homeless Prevention Documentation – utilize form or HMIS intake form
2. IHOPE – Assessment of Housing Options based upon information. All required to utilize IHOPE - either through one of the local shelters or the agency who has the ESG RR funds. This is a local decision of who completes the IHOPE. IHOPE not an eligibility assessment but to find the best housing type source - what is best housing based option for them based upon information. Once the Coordinated Access Assessment is completed and being utilized by the BOS, the IHOPE assessment will not be required. The Coordinated Access Assessment will be completed in January 2014.
3. HMIS intake and Assessment form -
4. Non-profit sub recipients may accept forms of identification, eg social security cards, birth certificates, etc.
5. Arizona Self Sufficiency Matrix – embedded in HMIS
5. Housing Plan – embedded in HMIS
6. Locating Housing – Utilize "Request for Unit Approval" to help client find apartment with assistance from coordinator.
7. Housing Inspection - Utilize Form – Habitability Form
8. Lead Based Form - utilize form
9. Rent Reasonable check - Utilize GoSection 8 – copy and place in file
10. Rent cannot be over FMR – utilize most up to date FMR. HUD provides these annually in October
11. Income information collected – place in file
12. If utilities not included in rent – Utility allowance calculated
13. Income calculation – Utilize Form. For HP, income verification required every 3 months
14. No Income – Utilize - Zero Income Form –
15. Lease Forms – Utilize Forms:
    RAP (rental assistance program) – between tenant & sub-recipient;
    RAP between landlord & sub-recipient
16. Copy of signed lease between landlord & tenant
17. Provide termination policy & procedures and appeals process
18. Case Management required monthly. Utilize HMIS service case management for time spent with each household/person

<u>SECTION IX: TERMINATION & APPEALS</u>

Terminating Assistance (576.402)

(a) *In general.* If a program participant violates program requirements, the sub recipient may terminate the assistance in accordance with a formal process established by the recipient or sub recipient that recognizes the rights of individuals affected. The sub recipient must exercise judgment and examine all extenuating circumstances in determining when violations warrant termination so that a program participant's assistance is terminated only in the most severe cases. Example:

> A client will only be terminated if the client or household members have threatened property/staff; or
>
> if the client has met the maximum number of months of assistance per ESG guidelines, or if the client has stated in writing they no longer want ESG financial assistance or case management; or

refusing to participate in the once a month case management requirement.

In each case, the reason for termination must be well documented and approved by a supervisor. To the extent possible, the ESG sub recipient must identify a subsequent living arrangement for the household with the goal of preventing shelter entrance. In most cases, it is expected that termination would only be completed after the ESG sub recipient had exhausted all opportunities to increase service plans, revise goals, and identify more suitable housing options. When the client is terminated, he/she should also be given a comprehensive service summary from ESG and list of contact information for places for financial and social service assistance.

Program participants receiving rental assistance or housing relocation and stabilization services. To terminate rental assistance or housing relocation and stabilization services to a program participant, the required formal process, at a minimum, must consist of:

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

(c) *Ability to provide further assistance.* Termination under this section does not bar the sub recipient from providing further assistance at a later date to the same family or individual.

Termination Policy and Appeal Process:

The sub recipient is required to have a written policy and procedures regarding reasons for termination and the procedure of the appeal process for those who are denied or terminated from the ESG program. These policies and procedures should be provided to all participants at the beginning of the program. This could be part of the intake into the program and the document needs to be signed and dated by participant and case management. IHCDA will not be the appeals process or involved in the appeal.

IHCDA has a sample document for your agency to use as a guide.

SECTION X: FINANCIAL MANAGEMENT, MATCH & CLAIMS

Before a sub recipient may first request reimbursement for ESG funds expended on specific activities/budget line items, the following items must be received by IHCDA:

- Signed/executed award agreement; and
- Completed budget page and budget activity narrative
- Requested documentation in response to conditional funding (if applicable)

Each ESG Sub recipient must match dollar-for-dollar the ESG funding provided by HUD with funds from other public or private sources. A sub recipient may comply with this requirement through matching funds or voluntary efforts provided by any recipient or project sponsor.

Matching funds must be provided after the date of the grant award to the sub recipient. Funds used to match a previous ESG grant may not be used to match a subsequent grant award. No federal funds can be used for match, with the exception of Community Development Block Grant funds.

All ESG Sub recipients are required to contribute 100% match to their ESG program. For example, if the ESG award is $10,000, the sub recipient must demonstrate $10,000 as match. The following items may be used as match:

Below are some examples of match that could be used as ESG match. Please note that in order for the match to be counted, it the source must be eligible, as described on the "Match Requirements" tab, and its use must be an eligible ESG activity. Match can be provided by the sub recipient itself OR any other community agency, but must directly benefit the ESG participants and be provided during the award term in order to be counted. This list is not exhaustive. Here is some match possibilities:

In-Kind	Cash
211 Helpline: Time conducting I-HOPE assessments or other eligible expenses.	CDBG
AIDS/HIV-related services provided to ESG participants	City or County funds
Alcohol and substance abuse services	Community Action Agencies
Bookkeeping/Administrative services for ESG program (but not billed to ESG)	Donations received as a result of the Neighborhood Assistance Program
Budgeting, credit repair service provided to participants in the community (but not billed to ESG)	ICJI grants, as eligible
Case management (not billed to ESG)	Local Foundations
Child care	Private donations
Clothing, Household, Hygiene items donated	Program income
Community Center - educational meetings related to housing, transportation vouchers, other eligible financial assistance	United Way
Donation Inventory Management	Township Trustees(s) assistance provided to ESG participants
Education, GED, classes (parenting)	
Employment assistance & Job Training	
Emergency Shelter/ Transitional Housing - services provided in program, not billed to ESG	
Faith Based Community; Ecumenical/Ministerial associations	
Food donated to participants by local churches (food stamps *cannot* be counted)	
Furniture donated	
Health care provided by	
Housing Food kit, Move-in kit preparation	
Housing placement	
Hygiene Kit preparation	
Legal Services	
Life skills Training not billed to ESG	
Mental health services (CMHC's)	
Minority Health Coalitions	
Motel Stays	
Move in Kits donated	
Office space donated	
Street Outreach: Engagement, case management, emergency mental health services, transportation, services to special populations	
Outpatient Health services - Community Health Centers, other medical centers	
Rent, not paid with ESG	
Renovation of shelter facility, benefiting ESG participants	
School Corporations- eligible services provided to ESG participants	

Transportation	
Utilities, not paid with ESG	
Utility Companies- any amount that is waived from arrears or deposits off of amount due	
Volunteer - professional - local, customary rate	
Volunteer - general labor. $5/hr	

Cash expended for allowable costs, as defined in OMB Circulars A-87 (2 CFR part 225) and A-122 of the recipient or sub recipient. Cash contributions must be expended within the award term to count toward the required match for the sub recipient's fiscal year grant. The matching contributions must be provided after the date that HUD signs the grant agreement, and before the expenditure deadline.

Federal Grants as Cash Match:
Matching contributions may be obtained from any source, including any Federal source other than the ESG program, as well as state, local, and private sources. However, the following requirements apply to matching contributions from a Federal source of funds:
a) The laws governing any funds to be used as matching contributions do not prohibit those funds from being used to match ESG funds.
b) If ESG funds are used to satisfy the matching requirements of another Federal program, then funding from that program may not be used to satisfy the matching requirements under this section.

Noncash Match (In-Kind):
The value of any real property, equipment, goods, or services contributed to the sub recipients's ESG program, provided that IF the sub recipient had to pay for them with grant funds, the costs would have been allowable. Noncash contributions may also include the purchase value of any donated building. Noncash contributions must be provided after award date, and before the expenditure deadline.

Calculating the Amount of Noncash Contributions:

To determine the value of any donated material or building, or of any lease, the sub recipient must use a method reasonably calculated to establish the fair market value.

Services provided by individuals must be ordinarily paid for similar work in the sub recipient's organization. If the sub recipient does not have employees performing similar work, the rates must be consistent with those ordinarily paid by other employers for similar work in the same labor market. All other general volunteer labor should be valued at $5/hour.

Some noncash contributions are real property, equipment, goods, or services that, if the sub recipient had to pay for them with grant funds, the payments would have been indirect costs. Matching credit for these contributions must be given only if the sub recipient has established, along with its regular indirect cost rate, a special rate for allocating to individual projects or programs the value of those Contributions.

Program Income
Costs paid by program income may count toward meeting the recipient's matching requirements, provided the costs are eligible ESG costs that supplement the sub recipient's ESG program.

The following are NOT allowed to be used as match:

SNAP benefits (food stamps), because the funds are being used to cover the program participant’s costs.

Housing Choice Vouchers, because the funds are used to pay the PHA's obligations under its Housing Assistance Payment contract with the owner; and;

The tenant's portion of the rent, because this amount is the tenant's obligation.

The matching funds are provided based on the total grant amount and do not have to be provided on a component-by-component basis. For example, if a sub recipient is spending $10,000 on HMIS, they do not need to find $10,000 in data collection funds from another source to use as match.

HOME-TBRA funds generally cannot be used as match, because the requirements for rental assistance are significantly different between the two programs. There could be a rare instance where it is possible; if you believe this is the case, please contact IHCDA to see if it would be allowable

SHP funds generally cannot be used as match, because very few activity costs are allowable under both SHP and ESG. However, in some cases, such as where SHP funds are used for HMIS costs that are allowable under ESG, SHP funds can be counted as match in accordance with above restrictions. Please note, however, that HMIS costs are only eligible to be used as match under ESG if they are eligible under section 576.107 and allocable to the ESG program, whether charged as direct costs or indirect costs. If the SHP HMIS funds are being used to pay for SHP projects' data entry, those data entry costs are not allocable to the ESG program and the funds used cannot be counted as match.

Budget Modifications

At some point during the program year, the sub recipient may need to reallocate funds budgeted among their approved activities.

Budget modification requests are reviewed by the ESG Program Coordinator to determine if the sub recipient has administered the grant in a timely and responsible manner, if the proposed modification presents new problems in meeting federal or state regulatory or policy requirements, or if the request in any way changes the factors involved in the initial evaluation of the proposal for funds.

There are two types of budget modifications permitted with the Emergency Solutions Grant.

1) Line item modification: Sub recipients can modify the amounts *among* line items within Essential Services and Operations as they deem necessary. No Budget Modification request to IHCDA is required for line item modifications.
2) Budget modification: Sub recipients are limited to *two* budget modification each program year. The request to IHCDA must be in letter format and submitted with an original signature of the Sub recipient's Chief Executive Officer or Executive Director. The letter must explain the circumstances and rationale for the requested budget change. The request must also contain a Budget Modification form completed online. Once submitted, the ESG Program Coordinator will review the request and notify the sub recipient of approval or denial in letter format. If approved, the letter will be accompanied with an amended award agreement, which must then be printed, signed and returned to IHCDA. Once this is received, IHCDA will sign the form as well and send the executed copy back by e-mail.

Claims

Sub recipients are required to submit claims monthly, for up to 18 months, via https://ihcdaonline.com/. The ESG Program Coordinator will give guidance on the Claims Process at the beginning of each new fiscal year.

In January 2014, IHCDA Financial Department will provide a new guidance on how to process claims. This new claim process should be followed at that time. Currently, it is taking public comment on the changes. Utilize the below requirements until the new process has started.

<u>Claim Process</u>
All claims are paid on a reimbursement basis Sub recipients incur eligible costs and then request reimbursement by IHCDA. There will be up to 18 claims per fiscal year. Each claim represents one month of bills that were ***incurred or paid*** during that month. Example: Claim #1 (July) will contain all eligible ESG expenses for July. All of the expenses listed must have either been incurred at some time in July or paid in July. Sub recipients cannot claim more or less than one month's expenses in one claim. After one month is claimed, the sub recipient cannot reclaim expenses for that same month later in the fiscal year. Similarly, if a sub recipient skips one month, and claims the month following the skipped month, the skipped month cannot be claimed at a later time. It is allowable to claim your award in less than 18 months of the agreement (18 claims). Sub recipients must submit request for reimbursement for no less than seventy-five percent (75%) of total award no later than following June of the next year.

The sub recipient must submit each claim for eligible expenses within sixty (60) days after the calendar month in which the expenses are incurred or paid by the sub recipient. For example, the July claim must be submitted no later than last day of September.

The following claim documents must be submitted with each claim:
1) Signed Claims Receipt
2) ESG RR and HP Excel Forms
3) Case Management Summary Sheet from HMIS
4) Supporting documentation

The claim cannot be processed until all four components have been received by the IHCDA Financial Department electronically – through the online system.

<u>Signed Claims Receipt</u>- The Claims Receipt is a receipt that is generated after the submission of the claim online. It must be opened as a PDF, printed, and signed by an Authorized Signatory approved by IHCDA.

<u>Case Management Summary Sheet</u>: The HMIS provides a summary of case management hours provided by each case manager. These hours must match the claim documentation of staff time spent when completing claims for reimbursement. The summaries must be attached showing the required 1x month of case management.

<u>ESG RR & HP Documentation Forms</u>- The documentation forms are an excel form that is separate from the online claim system. The sub recipient must list the correct items listed on the forms.

<u>Supporting Documentation</u>- This documentation includes copies of the actual receipt or bills that are being claimed for reimbursement or a copy of the check sent to the vendor. If a bill/invoice is submitted, the check number and date paid must be written or stamped on it. The organization will be contacted if there is any issue with the claim.

<u>Claiming Salaries</u> - Salaries can be budgeted in ESG RR & HP. All salaries can be for staff time spent providing *direct services* to homeless or at risk participants. On the excel forms list the employee's name in the corresponding activity column, and the amount claimed to ESG in the amount column.

<u>Closeout of ESG RR & HP Funds</u>:

All ESG RR & HP sub recipients will be required to complete and submit a grant closeout form due December 15th. This form will be distributed to sub recipients close to the end of the grant agreement year (ends December 31^{st} – 18 month agreement). All outstanding claims must be submitted by December 31^{st} of the 18 month of the agreement. All unclaimed funds remaining after this date will be closed out and no longer be available to the sub recipient. Any sub recipient who does not claim all funds by the end of the program year will negatively affect the award amount the following program year.

SECTION XI: OTHER FEDERAL AND STATE REQUIREMENTS

Confidentiality

Each ESG sub-recipient must develop and implement procedures to ensure:

- The confidentiality of records pertaining to any individual provided with assistance; and
- That the address or location of any assisted housing will not be made public, except that landlords may advertise their willingness to receive applicants from the program.

Recordkeeping

Each sub-recipient must keep any records and make any reports (including those pertaining to race, ethnicity, gender, and disability status data) that IHCDA or HUD may require within the timeframe specified. IHCDA provides a required file format checklist which all sub-recipients are to follow (**Form Checklist)** Files may also be uploaded into HMIS system if they have the capability.

Sanctions

If a recipient determines that a sub-recipient is not complying with the requirements of this guide or other applicable state or federal rules, regulations or laws, the recipient will take appropriate actions, which may include;

- Issuing a warning letter that further failure to comply with such requirements will result in a more serious sanction;
- Directing the sub-recipient to cease incurring costs with grant funds; or
- Requiring that some or all of the grant amounts be remitted to IHCDA.

Any grant amounts that become available to IHCDA as a result of a sanction will be made available (as soon as practicable) to other private non-profit organizations or units of general local government located in the state for use within the time periods specified in HUD Notice.

Monitoring

IHCDA is responsible for monitoring all ESG activities, including activities that are carried out by a sub-recipient, to ensure that the program requirements established by the HUD Notice and any subsequent guidance are met. This will be accomplished with regular site visits to sub-recipients and review of grant activity reports that will be required of sub-recipients.

Sub-recipients are expected to make available all participant level, financial and program records for periodic review on a schedule to be established by IHCDA. In addition, sub-recipients will maintain participant files in compliance with the standard set by IHCDA. Significant deficiencies in file content or quality will result in required Plans of Corrective Action, with possible loss of allocated funds upon discovery of continuing deficiencies.

Program and HMIS usage and data integrity will also be subject to regular and random monitoring by IHCDA staff. Monitoring of sub-recipients may be conducted by the IHCDA, local HUD Office of Community Planning and Development, HUD's Office of Special Needs Assistance Programs, HUD's Office of Inspector General, HUD's Office of Fair Housing and Equal Opportunity, or another federal agency to determine whether the sub-recipient complied with the requirements of this program.

Conflicts of Interest (576.404)

a) *Organizational conflicts of interest.* The provision of any type or amount of ESG assistance may not be conditioned on an individual's or family's acceptance or occupancy of emergency shelter or housing owned by the recipient, the sub recipient, or a parent or subsidiary of the sub recipient. No sub recipient may, with respect to individuals or families occupying housing owned by the sub recipient, or any parent or subsidiary of the sub recipient, carry out the initial evaluation required under or administer homelessness prevention assistance.

b) Individual conflicts of interest. For the procurement of goods and services, the recipient and its sub recipients must comply with the codes of conduct and conflict of interest requirements under 24 CFR 85.36 (for governments) and 4CFR 84.42 (for private nonprofit organizations). For all other transactions and activities, the following restrictions apply:

(1) *Conflicts prohibited.* No person described in paragraph (b)(2) of this section who exercises or has exercised any functions or responsibilities with respect to activities assisted under the ESG program, or who is in a position to participate in a decision-making process or gain inside information with regard to activities assisted under the program, may obtain a financial interest or benefit from an assisted activity; have a financial interest in any contract, subcontract, or agreement with respect to an assisted activity; or have a financial interest in the proceeds derived from an assisted activity, either for him or herself or for those with whom he or she has family or business ties, during his or her tenure or during the one-year period following his or her tenure.

(2) *Persons covered.* The conflict-of interest provisions of paragraph (b)(1) of this section apply to any person who is an employee, agent, consultant, officer, or elected or appointed official of the recipient or its sub recipients.

Environmental Requirements

The HUD Notice does not direct, provide for assistance or loan and mortgage insurance for, or otherwise govern or regulate, real property acquisition, disposition, leasing (other than tenant-based rental assistance), rehabilitation, alteration, demolition, or new construction, or establish, revise or provide for standards for construction or construction materials, manufactured housing, or occupancy. Accordingly, under 24 CFR 50.19(c) (1), the HUD Notice is categorically excluded from environmental review under the National Environmental Policy Act of 1969 (42 U.S.C.4321). Moreover, consistent with the provisions for administrative and management expenses, tenant-based rental assistance, and supportive services in 24 CFR 50.19(b) (3), (11), and (12), **the eligible activities to be assisted under the HUD Notice are categorically excluded from the requirements of the National Environmental Policy Act of 1969 (42 U.S.C. 4321) and are not subject to environmental review under the related laws and authorities.**

Lead-Based Paint Requirements

Background

The primary cause of childhood lead poisoning is deteriorating lead-based paint and lead-contaminated dust and soil in older housing units. Although lead was banned from residential house paint in 1978 by the Consumer Product Safety Commission (CPSC), an estimated 57 million older homes still contain some lead-based paint. Of these, some 3.8 million dwellings are thought to have both lead-based paint hazards and young children as residents.

The amount of lead-based paint in housing is significant. Tens of millions of housing units contain at least some lead-based paint. Children living in homes with lead-based paint become exposed to lead by directly eating chips of lead-based paint or chewing on protruding surfaces painted with lead-based paint. The more common route of exposure, however, is the ingestion of lead-bearing dust that is generated by the paint when it deteriorates, chalks, or is disturbed through renovation or even abrasion from the opening and closing of windows. Even in this less direct way, lead-based paint can be a source lead poisoning.

The most common route of exposure for children is through ingestion of lead-contaminated dust. This dust sticks to moist hands as a child plays or crawls across the floor, and is then ingested via finger sucking or other normal hand-to-mouth activity. A child can also be poisoned by eating lead-based paint chips and lead-contaminated soil, and by being exposed to other environmental sources of lead from inside and outside the home. Additionally, repair and renovation activities, such as repainting, that disturb lead-based paint can generate significant levels of leaded dust to which children can be easily exposed.

“Lead-based paint hazards” have been defined in the Residential Lead-Based Paint Hazard Reduction Act of 1992, commonly referred to as “Title X,” as any of six conditions which can present lead exposures sufficient to cause adverse health effects. These include:

1. lead-contaminated dust;
2. deteriorated lead-based paint;
3. intact lead-based paint on friction surfaces;
4. intact lead-based paint on impact surfaces;
5. intact lead-based paint on chewable surfaces accessible to young children; and
6. lead contaminated bare soil.

ESG Lead Requirements

The only ESG-assisted housing covered under the lead based paint requirements is longer-term transitional housing in an apartment with one or more bedrooms AND which has family residents who are part of a program requiring continual residence of more than 100 days.

The EPA Lead brochures must be distributed to all households receiving long-term rental assistance. Documentation of this brochure must be maintained in each client file.

Exemptions to the New Lead Based Paint Requirements

- Residential structures built after January 1, 1978;
- Emergency action activities;
- Existence of Lead-Based Paint Unlikely;
- Areas where state and local governments banned lead-based paint prior to January 1, 1978;
- Properties found not to have lead-based paint during earlier testing that meets the requirements of prior evaluations;
- Properties where all lead-based paint has been identified and removed using approved methods;
- Human Threat Unlikely;

- Unoccupied units that will be demolished;
- Property not suitable for human residential habitation
- Rehabilitation that does not disturb paint;
- Child Occupancy Unlikely;
- Zero-room dwelling units;
- Elderly and disabled housing; and
- Emergency housing assistance (such as for the homeless) unless the assistance is for long-term assistance that lasts more than 100 days. In the case where longer-term housing assistance lasts for more than 100 days, then rule does apply.

Long-term Rental Assistance

If there will be a child under the age of 6 residing in the unit receiving ESG long-term housing, the award sub recipient must conduct a visual assessment for the presence of lead-based paint. Award sub recipients cannot provide long-term rental assistance to any unit with lead-based paint present.

Lead Hazard Evaluation

The interior and exterior surfaces and common areas of the rental property must be visually assessed to identify deteriorated paints. Note: A visual assessment is not considered an evaluation that requires a notification of lead hazard evaluation, since the assessment does not evaluate lead-based paint and/or lead hazards.

If the visual assessment reveals deteriorated paint, the award sub recipient should notify the owner of the unit with inspection results. The owner is required to have the deteriorated paint tested for lead based paint or to assume the presence of lead based paint is its stabilization activities.

Award sub recipient staff should instruct the owner to conduct paint stabilization before the unit is occupied to control possible lead-based paint hazards.

Owners must correct the deteriorated paint identified during the visual assessment process using safe work practices in order to participate in the long-term rental assistance program.

Lead Hazards Reduction

At the completion of any paint stabilization, the owner must sign the Lead Certification 8.11 of the HQS inspection form or a form with equivalent language. This section instructs the owner to provide certification to the administering agency if any correction of defective paint occurs at the unit.

➢ Training/Supervision. Workers performing paint stabilization must be trained in accordance with OSHA regulations at 29 CRF 1926.59. In addition, they must meet one of the following:

(a) Supervision by a certified abatement supervisor;

(b) Successful completion of an accredited abatement supervisor course in accordance with 40 CFR 745.225;

(c) Successful completion of an accredited lead-based paint abatement worker course in accordance with 40 CFR 745.225;

(d) Successful completion of the Lead-Based Paint Maintenance Training Program developed by the National Environmental Training Association for EPA and HUD;

(e) Successful completion of the Remodeler’s and Renovator’s Lead-Based Paint Training Program developed by HUD and the National Association of the Remodeling Industry; or

(f) Successful completion of an equivalent course approved by HUD.

- Safe Work Practices. The owner must use safe work practices when conducting paint stabilization. Safe work practices include safe work methods, occupant protection, worksite preparation, and cleanup.

(a) Occupant Protection. Work should be performed in a vacant unit if possible. If residents must remain inside the dwelling during work, a barrier to the room where stabilization is taking place should be erected and residents should not be allowed to enter the work area until clearance has been completed.

(b) Worksite Preparation. The worksite should be contained using plastic sheeting extending five feet beyond the perimeter of the treated area in all directions on the floor. Ventilation systems should be turned off until work is complete.

(c) Cleanup. After paint stabilization is complete, the worksite should be cleaned to remove all lead-based paint dust. Cleanup must be accomplished by wet washing surfaces with a lead specific detergent or its equivalent. Other cleaning devices, such as vacuum cleaners with HEPA filters, can be used during cleanup. Waste and debris must be disposed of in sealed containers in accordance with Federal and state waste disposal requirements. Use of a HEPA vacuum is recommended.

- Exemptions to Safe Work Practices. Safe work practices are not required when treated areas are tested and found to be free of lead-based paint, or if the surface area being treated is smaller that a total of 2 square feet per room or 10 percent of the total surface area of interior components, such as window sills.

- Occupant Protection. Property owners should protect residents and their personal belongings from exposure to lead-contaminated dust and debris during paint stabilization.

(a) Personal belongings should be relocated to an area outside the treatment area or covered with an impermeable covering with all seams and edges taped shut.

(b) Residents may need to be temporarily relocated during treatment if they are exposed to lead-based paint hazards.

(c) Worksite Preparation. The award sub recipient should instruct the owner to control the spread of dust and debris at the worksite. This preparation should ensure that leaded dust, lead-based paint chips and other debris are contained within the worksite until they can be safely removed. Protective measures include sealing off vents and doorways with poly sheeting; covering floors and furniture with poly sheeting and wrapping debris in poly before disposal.

- Cleanup. After paint stabilization is complete, the worksite should be cleaned to remove lead-based paint dust. Cleanup must be accomplished by wet washing surfaces a lead-specific detergent or its equivalent. Vacuum cleaners with HEPA filters should be used during cleanup. Waste and debris must be disposed in sealed containers in accordance with Federal and state disposal requirements.

Clearance

- Clearance must take place following paint stabilization. Clearance helps to ensure that lead-based paint hazards are controlled and the unit is safe for habitation.

- Paint stabilization and other lead hazard reduction efforts are considered complete when clearance is conducted. Clearance must be performed to ensure that lead-based paint hazards have been controlled.

(a) Clearance consists of a visual examination, collection of dust samples, and laboratory analysis of the samples for lead.

(b) Clearance is performed after lead hazard reduction and clean-up are complete.

(c) Dwellings must meet the following clearance standards.

	Floors ($\mu g/ft^2$)	Interior Window Sills	Window Troughs ($\mu g/ft^2$)

		($\mu g, ft^2$)	
Lead in Dust (as measured by a dust wipe sample)	40	250	800

- Clearance Examiner. The administering agency is responsible for hiring a certified professional to conduct the clearance. This professional may be a certified risk assessor, lead-based paint inspector, or clearance technician. The clearance examiner must be independent from the individual or entity who conducted the paint stabilization or other lead hazard reduction, unless they are employees of the administering agency. Note: If agency employees are used, the same individual who conducted paint stabilization is not permitted to conduct clearance.
- Clearance Report. Prior to closing, and within 15 calendar days of the completion of the lead hazard reduction activities, the tenant must be notified of the clearance examination. The administering agency should ensure that the report is prepared and sent to the tenant. This report should include:

(a) Beginning and ending dates of the lead hazard reduction activities.

(b) Name and address of the firm conducting lead hazard reduction activities and the name of the supervisor assigned to the lead hazard reduction activities.

(c) The name, address and signature of each person conducting clearance sampling, the date of the clearance testing, and the certification number for each certified risk assessor or inspector who conducted sampling.

(d) The results of clearance testing and the name of each laboratory that conducted the analyses and the identification number of the laboratory.

(e) A detailed written description of the lead hazard reduction activities including methods used, location of rooms where activity occurred, and any suggested monitoring.

- Notify Tenants. The owner must provide a notice to tenants describing the results of the clearance examination. The award sub recipient should instruct the owner to notify tenants of clearance results.
- Staff Training. As a result of the new cleanup and clearance requirements, the administering agency will need to evaluate their program design and incorporate these new requirements.

(a) All program staff should have a basic understanding of the proper clearance procedures;

(b) Staff conducting the clearance examination must complete one of the acceptable training courses listed under paint stabilization; and

Program staff should understand the components of the clearance report and understand the procedures for notifying the buyer of the results. The Lead-Based Paint Poisoning Prevention Act (42 U.S.C. 4801 et seq.), as amended by the Residential Lead-Based Paint Hazard Reduction Act of 1992 (42 U.S.C. 4851 et seq.) and implementing regulations at 24 CFR part 35, subparts A, B, M, and R shall apply to housing occupied by families receiving assistance through ESG. **This requires that a visual inspection be made of any property built prior to 1979 for possible evidence of flaking or peeling paint.**

Any suspect areas must be remediated according to HUD and EPA standards and the unit re-inspected prior to occupancy. The leaser of any such unit must be provided with the EPA leaflet related to lead risks. While households remaining in their present housing with ESG assistance are generally not required to undergo a habitability inspection, any unit built prior to 1979 with children under the age of six in it must be inspected if ESG assistance is rendered.

Nondiscrimination and Equal Opportunity Requirements

Sub-recipients must comply with all applicable fair housing and civil rights requirements in 24 CFR 5.105(a). In addition, sub-recipients must make known that ESG rental assistance and services are available to all on a nondiscriminatory basis and ensure that all citizens have equal access to information about ESG and equal access to the financial assistance and services provided under this program. Among other things, this means that each sub-recipient must take reasonable steps to ensure meaningful access to programs to persons with limited English proficiency (LEP), pursuant to Title VI of the Civil Rights Act of 1964. This may mean providing language assistance or ensuring that program information is available in the appropriate languages for the geographic area served by the jurisdiction and that limited English proficient persons have meaningful access to ESG assistance

In addition, all notices and communications shall be provided in a manner that is effective for persons with hearing, visual, and other communication related disabilities consistent with section 504 of the Rehabilitation Act of 1973 and implementing regulations at 24 CFR 8.6. If the procedures that the sub-recipient intends to use to make known the availability of the rental assistance and services are unlikely to reach persons of any particular race, color, religion, sex, age, national origin, familial status, or disability who may qualify for such rental assistance and services, the sub-recipient must establish additional procedures that will ensure that such persons are made aware of the rental assistance and services.

Affirmatively Furthering Fair Housing

Under section 808(e) (5) of the Fair Housing Act, HUD has a statutory duty to affirmatively further fair housing. HUD requires the same of its funding recipients. Sub-recipients will have a duty to affirmatively further fair housing opportunities for classes protected under the Fair Housing Act. Protected classes include race, color, national origin, religion, sex, disability, and familial status. Examples of affirmatively furthering fair housing include: (1) marketing the program to all eligible persons, including persons with disabilities and persons with limited English proficiency; (2) making buildings and communications that facilitate applications and service delivery accessible to persons with disabilities (see, for example, HUD's rule on effective communications at 24 CFR 8.6); (3) providing fair housing counseling services or referrals to fair housing agencies; (4) informing participants of how to file a housing discrimination complaint, including providing the toll-free number for the Housing Discrimination Hotline: 1-800- 669-9777; and (5) recruiting landlords and service providers in areas that expand housing choice to program participants.

Uniform Administrative Requirements

Non-profit sub-recipients shall be subject to the requirements of 24 CFR Part 84. This includes responsibility for an IRS A-133 compliant audit if more than $500,000 of federal funds is received annually.

Equal Participation of Religious Organizations

Sub-recipients that are religious or faith-based are eligible, on the same basis as any other organization, to participate in ESG. Neither the federal government nor a Sub recipient shall discriminate against an organization on the basis of the organization's religious character or affiliation.

Sub-recipients that are directly funded under ESG may not engage in inherently religious activities, such as worship, religious instruction, or proselytization as part of the programs or services funded under ESG . If an organization conducts such activities, the activities must be offered separately, in time or location, from the programs or services funded under ESG, and participation must be voluntary for the program participants.

A religious organization that participates in ESG will retain its independence from federal, state, and local governments, and may continue to carry out its mission, including the definition, practice, and expression of its religious beliefs, provided that it does not use direct ESG funds to support any inherently religious activities, such as worship, religious instruction, or proselytization. Among other things, faith-based organizations may use space in their facilities to provide ESG -funded services, without removing religious art, icons, scriptures, or other religious symbols. In addition, a ESG -funded religious organization retains its authority over its internal governance, and it may retain religious terms in its organization's name, select its board members on a religious basis, and include religious references in its organization's mission statements and other governing documents.

Sub-recipients that participate in the ESG program shall not, in providing program assistance, discriminate against a program participant or prospective program participant on the basis of religion or religious belief.

Lobbying and Disclosure Requirements

The disclosure requirements and prohibitions of section 319 of the Department of the Interior and Related Agencies Appropriations Act for Fiscal Year 1990 (31 U.S.C. 1352) (the Byrd Amendment), and implementing regulations at 24 CFR part 87, apply to ESG . Applicants must disclose, using Standard Form LLL (SF-LLL), "Disclosure of Lobbying Activities," any funds, other than federally appropriated funds, that will be or have been used to influence federal employees, members of Congress, or congressional staff regarding specific grants or contracts.

Drug-Free Workplace Requirements

The Drug-Free Workplace Act of 1988 (41 U.S.C. 701, et seq.) and HUD's implementing regulations at 24 CFR part 21 apply to ESG. Sub-recipients are required to sign the Drug Free Workplace Certification as a part of the contracting process. This requires that all sub-recipients post and enforce Drug Free Workplace standards, specifically including a prohibition on the use of ESG monies for any alcohol or drug related expense (except for the assessment and referral of eligible participants for whom such alcohol or drug use constitutes a barrier to stable housing.)

Frequently Asked Questions from HUD One CPD Website:

Question:
Is an individual or family that is receiving Rapid Re-Housing Assistance considered homeless for purposes of remaining eligible for other permanent housing placements?

Answer:
Yes. Program participants that are receiving Rapid Re-Housing Assistance through programs such as the Emergency Solutions Grants (ESG) Program, the Continuum of Care (CoC) Program, the Supportive Services for Veterans Families (SSVF) Program, or the Veterans Homelessness Prevention Demonstration Program (VHPD) maintain their homeless status for the purpose of eligibility for other permanent housing programs, such as HUD-VASH and CoC-funded permanent supportive housing (so long as they meet any other additional eligibility criteria for these programs). Program participants only maintain their homeless status during the time period that they are receiving the rapid re-housing assistance. Rapid re-housing is a model for helping homeless individuals and families obtain and maintain permanent housing, and it can be appropriate to use as a bridge to other permanent housing programs.

It is important to note that although the program participants in rapid re-housing are considered homeless for purposes of eligibility for other programs, the housing itself is still considered permanent housing; therefore, these program participants are not considered homeless for counting purposes, and must not be included in the CoCs sheltered point-in-time count.

Question:

Can ESG be used in combination with HUD-VASH?

Answer:
ESG funds may be used to provide security deposits to help veterans move into units receiving HUD-VASH rental assistance, as long as the security deposit is not being paid for with another source of funds. ESG may not be used to provide rental assistance during the same period of time that HUD-VASH is providing rental assistance for the same participant. (See 24 CFR § 576.106).

Question:
To what ESG program components does the 30% area median income (AMI) limit apply?

Answer:
For **Rapid Re-Housing**, an income assessment is not required at initial evaluation. However, at annual re-evaluation, income must be LESS THAN OR EQUAL TO 30% AMI.

For **Homelessness Prevention** assistance, households must have an income BELOW 30% AMI at initial evaluation, and have no other housing options, financial resources, or support networks. At re-evaluation - not less than once every three months - the participant must have an annual income LESS THAN OR EQUAL TO 30% AMI.

Whether a sub recipient must stop a program participant's ESG assistance upon learning of an increase in income (or other change in household circumstances that may affect eligibility) depends upon whether the information is obtained through a re-evaluation, or through other means (e.g., case management).

If income over AMI is discovered *during* re-evaluation for homelessness prevention and rapid re-housing assistance: Each re-evaluation of eligibility must establish that the program participant has an annual income that does not exceed 30 percent of median family income for the area, as determined by HUD. (24 CFR § 576.401(b)(1)(i)). Rapid Re-Housing program participants must be re-evaluated not less than once annually and Homelessness Prevention program participants must be re-evaluated not less than once every three months. If the re-evaluation shows that the program participant is no longer eligible for ESG, assistance must be stopped at that time.

If income over AMI is discovered *outside* of the re-evaluation process for homelessness prevention and rapid re-housing assistance: HUD does not require sub recipients to conduct a re-evaluation outside of the regular re-evaluation process if information becomes available to indicate that a household has (or may have) increased income or a change in household circumstances that affect eligibility for the program. However, the sub recipient has discretion to institute its own standards and MAY require each program participant receiving Rapid Re-Housing or Homelessness Prevention assistance to provide information about changes in income or other circumstances (e.g., household composition) that affect the program participant's need for assistance. When a program participant notifies a sub recipient of a relevant change because the notification is **REQUIRED,** the recipient/sub recipient MUST re-evaluate the program participant's eligibility and the amount and types of assistance the program participant needs (see 24 CFR § 576.401(b)(2)). If the re-evaluation shows that the program participant is no longer eligible for ESG, assistance must be stopped at that time.

If the sub recipient has NOT required such a notification, simply receiving information about a change in a program participant's situation outside of the re-evaluation process (e.g., through case management or credit repair activities) has no immediate effect on the program participant's eligibility for ESG, and ESG assistance can continue until the next re-evaluation. At that time, the re-evaluation will determine whether the program participant continues to be eligible for ESG assistance.

Question:
If I am providing only housing relocation and stabilization services under the Rapid Re-housing or Homelessness Prevention components, do the habitability requirements apply?

Answer:
Yes, habitability standards (24 CFR § 576.403(c)) apply any time ESG funds are used to help a program participant remain in or move into housing under the Rapid Re-housing or Homelessness Prevention components. This would include providing only rental arrears assistance, only security deposit, only legal assistance, only credit repair, etc.

In cases where the program participant will be moving to a new unit, the habitability requirement applies to the new unit the program participant will move to, not to the unit the household is leaving.

Question:
What are the limits on rental assistance provided through ESG? For how many months of rental arrears can the ESG funds be used?

Answer:
The maximum length of time a program participant may receive rental assistance through ESG is 24 months during any 3-year period. Short-term rental assistance is for up to 3 months of rent. Medium-term rental assistance is for more than 3 months, but not exceeding 24 months. Payment of rental arrears consists of a one-time payment for up to 6 months of rent in arrears, including any late fees on those arrears. The limit of up to 24 months of payments must include the arrears payments. For example, if a participant receives assistance for 6 months of rental arrears payments, the maximum amount of monthly rental assistance they may receive is 18 months.

Question:

Can the cost of sub recipients' travel time and expenses to an ESG-specific training provided by Recipient be an eligible Administrative expense under ESG? The Regulations states training includes the "Costs of providing training on ESG requirements and attending HUD-sponsored ESG trainings." However, what about trainings sponsored by the Recipient? With HPRP, these expenses were eligible as long as the training was HPRP specific. However based on the statement in the regulation stated above, it would appear the sub recipient's time and costs to travel for training would not be eligible. Please clarify what sub recipient expenses are eligible with regard to training and travel.

Answer:

The sub recipient's time and costs to travel to and attend **recipient- or sub recipient-sponsored** training or conferences is not an eligible ESG activity. Also, it cannot be considered match.

The costs of attending a **HUD-sponsored** training (including HUD webinars) can only be eligible as an Administrative cost. However, if a sub recipient does not receive Administrative funds, or if the recipient has used all of its available administrative funds (subject to the 7.5% cap), then the sub recipient could use the funds they spent to attend the training as match, as long as it was in accordance with HUD's match requirements (see 24 CFR 576.201 and the FAQ on match found at http://hudhre.info/index.cfm?do=viewFaqById&faqID=1928).

The costs of training **provided by** the recipient or sub recipient on ESG requirements is an eligible administrative cost, and therefore must be charged to Administration. If the sub recipient does not receive Administrative funds, then they cannot use ESG funds to pay for providing training. However, note that providing and attending meetings or structured information sessions in which in-house staff work to improve their knowledge of the ESG program in order to perform their jobs is allowable. For example, a supervisor could have a meeting with case management staff for a Rapid Re-Housing program to go over how to complete intake forms. This type of supervisory work would be charged to the applicable program component. In this example, it would be charged to the Rapid Re-housing component.

Question:

Can the rental arrears payment be paid to a former landlord who is now placed the arrears under a collection agency and now has gone to court? Can the payment go to the collection agency or the court directly?

Answer:

No, ESG funds may not be used to pay rental arrears to a former landlord who has placed the arrears under a collection agency nor can ESG funds be used to pay a collection agency directly.

If a former landlord has placed arrears under a collection agency, ESG funds may not be used to pay the arrears directly to the former landlord. That is because once the landlord turns the arrears over to a collection agency the funds are no longer owed to the landlord. Additionally, ESG funds may not be used to pay a collection agency for the arrears formerly owed to the landlord. A recipient or sub recipient may only make rental assistance payments, including an arrears payment, to an owner with whom the recipient or sub recipient has entered into a rental assistance agreement. § 576.106(e).

Please also note that the costs of Homelessness Prevention or Rapid Re-Housing assistance, including rental arrears assistance, are only eligible to the extent that the assistance is necessary to help the program participant regain stability in his/her current permanent housing or move into other permanent housing and achieve stability in that housing. (See § 576.103 and § 576.104). This means that ESG funds should be used to pay for rental arrears ONLY if failing to pay the arrears would result in the potential participant moving into an emergency shelter or place not meant for human habitation or would prevent the eligible participant from obtaining housing.

Center For
Capacity Building
National Alliance To End Homelessness

Rapid Re-Housing Triage Tool

This tool may be helpful for the purposes of determining what services a rapid re-housing eligible household is in need of. Communities would ideally use this tool only after prevention or diversion had been ruled out as options for a household and before or very shortly after admitting them to a shelter program if they have no place else to stay. This tool should be used as a starting point; communities are encouraged to refine the tool to reflect local data and system outcomes.

Level of Assistance	Tenant Screening Barriers (Barriers to Obtaining Housing)	Retention Barriers (Barriers to Sustaining Housing)
Level 1— The **household** will need minimal assistance to obtain and retain housing. The Rapid Re-Housing (RRH) program offers the following for most Level 1 households: ❖ Financial assistance for housing start-up (e.g. first month's rent, security deposit, utility deposit) ❖ Initial consultation related to housing search (e.g. where to find rental information, how to complete housing applications, documentation needed) ❖ Time-limited rental assistance, per client Housing Plan ❖ Home visit/check-in after move-in ❖ Offer of services (at tenant request) for up to 3 months. **Landlord** assistance will likely include only program contact information for tenancy concerns	Household has no criminal history Rental history: an established local rental history. No evictions, landlord references are good to fair Credit history is good, with the exception of a few late utility and credit card payments	No significant barriers except financial: very low income, insufficient emergency reserves
Level 2— The **household** will need routine assistance	Household has no serious criminal history,	Financial barriers include very low

<table>
<tr><th>Level of Assistance</th><th>Tenant Screening Barriers (Barriers to Obtaining Housing)</th><th>Retention Barriers (Barriers to Sustaining Housing)</th></tr>
<tr><td>to obtain and retain housing. The RRH program offers the following for most Level 2 households:

❖ Financial assistance for housing start-up
❖ Time-limited rental assistance, per client Housing Plan
❖ Initial consultation and ongoing assistance with housing search, including bus tokens as needed
❖ Development of Housing Plan to work on any identified retention barriers
❖ Weekly home visits for first two months; then reduce to bi-weekly or monthly as most Housing Plan goals are met.
❖ Services available for up to 6 months, depending on housing problems and progress toward Housing Plan goals.

<u>Landlord</u> assistance:

❖ 6 month availability: landlord can call with tenancy issues and program will respond.
❖ Program will check in with landlord periodically for updates.
❖ RRH program will relocate household if landlord is considering eviction.</td><td>but may have a few minor offenses such as moving violations, a DUI, or a misdemeanor

Rental history is limited or out-of-state. May have 1-2 explainable evictions for non-payment. Prior landlords may report a problem with timely rent.

Credit history shows pattern of late or missed payments</td><td>income, may have inconsistent employment, poor budgeting skills

No serious mental illness or chemical dependency that affects housing retention. May have some level of depression or anxiety or problems responding to conflict

May lack awareness of landlord-tenant rights/responsibilities.

May have minor problems meeting basic household care/cleaning.

May have been homeless once before.</td></tr>
<tr><td>Level 3—
The <u>household</u> will need more intensive and/or longer assistance to obtain and retain housing. The RRH program offers the following for most Level 3 households:

❖ Financial assistance for housing start-up
❖ Time-limited rental assistance, per client Housing Plan
❖ Initial consultation and ongoing assistance with housing search, including bus tokens as needed. Staff may accompany client to</td><td>Household may have some criminal history, but none involving drugs or serious crimes against persons or property

Rental history includes up to 3 evictions for non-payment. Prior landlord references fair to poor. Partial damage</td><td>Household is very low income, has periods of unemployment, no emergency reserves, lacks budgeting skills

Problems with mental health or alcohol/substance use that somewhat impacts compliance with tenancy requirements.</td></tr>
</table>

Level of Assistance	Tenant Screening Barriers (Barriers to Obtaining Housing)	Retention Barriers (Barriers to Sustaining Housing)
the landlord interview. ❖ Development of Housing Plan to work on any identified retention barriers ❖ Weekly home visits for first two months; then reduce to bi-weekly or monthly as most Housing Plan goals are met. Include unannounced drop-in visits. ❖ Services available for up to 9 months, depending on housing problems and progress toward Housing Plan goals. **<u>Landlord</u>** assistance: ❖ 9 month availability; landlord can call with tenancy issues and program will respond even after services end. ❖ Program will check in with landlord periodically for updates. ❖ RRH program will relocate if an eviction is being considered. If household will not leave, program may pay court costs. ❖ Program may pay or repair damages.	deposit returned. Some complaints by other tenants for noise Credit history includes late payments and possible court judgments for debt, closed accounts	May have deficits in care of apartment, landlord-tenant rights/responsibilities, communications skills with landlord and/or other tenants Conflict may exist in household May have lost housing and been homeless several times in past
Level 4— The **<u>household</u>** will need more intensive and longer assistance to obtain and retain housing. The RRH program offers the following for most Level 4 households: ❖ Financial assistance for housing start-up ❖ Time-limited rental assistance, per client Housing Plan ❖ Initial consultation and ongoing assistance with housing search, including bus tokens as needed. Staff may accompany client to the landlord interview. ❖ Development of Housing Plan to work on any identified retention barriers ❖ Weekly home visits for first two months;	Criminal history, violations may include drug offense or crime against persons or property Rental history includes up to five evictions for non-payment and/or lease violations. Landlord references poor. Security deposit may have been kept due to damage to unit. Credit history is poor, late payments, may	Extremely low income, no emergency reserves, bank accounts closed, lacks budgeting skills. May be using drugs/alcohol and/or has mental health problems. May have conflict with child/ren or partner. May lack ability to care for apartment or communicate appropriately with landlord and other tenants.

Level of Assistance	Tenant Screening Barriers (Barriers to Obtaining Housing)	Retention Barriers (Barriers to Sustaining Housing)
then reduce to bi-weekly or monthly as most Housing Plan goals are met. Include unannounced drop-in visits. ❖ Services available for up to 12 months, depending on housing problems and progress toward Housing Plan goals. **<u>Landlord</u>** assistance: ❖ 12 month availability; landlord can call with tenancy issues and program will respond; ongoing option to call even after Rapid Re-Housing services are ended can be offered or negotiated on a case-by-case basis. ❖ Program will check in with landlord monthly (or more often if landlord prefers) for updates/issues. ❖ May pay an additional damage deposit and/or last month's rent in addition to normal start-up costs. ❖ RRH program will relocate household if an eviction is being considered. If household will not leave, program may pay court costs of eviction. ❖ Program may pay or repair damages.	include judgment for debt to a landlord, closed accounts	Has likely been homeless multiple times or for more extended periods
Level 5— Household needs longer or more intensive services; may need staff with more professional training. RRH program refers household to appropriate program, such as intensive case management, permanent supportive housing or other local resources.	Extensive criminal background Extremely poor rental history, multiple evictions, serious damage to apartment, complaints Credit history includes multiple judgments, unpaid debts to	Active and serious chemical dependency or mental illness Unable to comply with lease requirements or interact positively with landlord/tenants; poor apartment management skills, out-of-control behaviors by adult or child/ren

Level of Assistance	Tenant Screening Barriers (Barriers to Obtaining Housing)	Retention Barriers (Barriers to Sustaining Housing)
	landlords, closed accounts	May have experienced chronic homelessness (multiple and/or extended periods of homelessness)

Attachment D

Homelessness Prevention and Rapid Re-Housing Program (HPRP)

STATUS REPORT ON HPRP SPENDING: Disbursements Toward Three-Year (100%) Expenditure Deadline

Sorted by Grantee State and by % of Funds Drawn (4/16/12)

The HPRP program requires, by statute, that grantees expend 100% of their award funds within three years of the date that HUD signed the grant agreement. This document contains a listing of all HPRP grantees, their current expenditure rates as measured by draw-downs of funds from HUD's Integrated Disbursement and Information System (IDIS), and projections as to whether each grantee will meet the requirement, based on the most recent 12 weeks of draws.

This is one of three grantee expenditure listings HUD is making available to assist grantees in tracking their progress toward the requirement. Grantees whose current expenditure rates will cause their projection to fall short of the 100% mark, have a gap or projected gap amount on the list, and should take the necessary steps to increase their expenditure rates.

Please note that these projections are based on draws from IDIS, which may differ from expenditures documented in the grantee's own financial tracking system. This data also does not account for grantees' existing commitments to spend HPRP funds.

For more technical assistance documents to assist in considering options on expending funds, see the Homelessness Resource Exchange at www.hudhre.info. Or, contact HUD via the Virtual Help Desk (located online at http://www.hudhre.info/helpdesk).

Attachment D

Disbursements/Three Year (100%) Expenditure Deadline Trend
Analysis with Projections (based on previous 12 weeks)
Sorted by Grantee State and % of Funds Drawn (as of 4/16/12)

HPRP Grantee	State/ Terr	HPRP Authorized Amount	% of Funds Drawn	Projected Total Draws at 3 Years	Gap or Projected Gap in Meeting 3 Year 100% Expenditure Deadline	Approximate monthly draw to meet 3-year 100% requirement
ANCHORAGE	AK	$ 776,469.00	98.16%	$ 776,469.00	$ -	$ 4,564.53
ALASKA	AK	$ 1,143,986.00	98.86%	$ 1,143,986.00	$ -	$ 4,193.47
JEFFERSON COUNTY	AL	$ 845,709.00	80.87%	$ 694,141.00	$ 151,568.00	$ 52,353.70
HUNTSVILLE	AL	$ 529,697.00	87.93%	$ 474,838.06	$ 54,858.95	$ 20,688.45
BIRMINGHAM	AL	$ 2,735,730.00	90.68%	$ 2,735,730.00	$ -	$ 82,537.83
MONTGOMERY	AL	$ 860,653.00	96.15%	$ 840,582.04	$ 20,070.96	$ 10,081.84
MOBILE	AL	$ 1,186,394.00	97.44%	$ 1,186,394.00	$ -	$ 10,048.12
ALABAMA	AL	$ 13,328,942.00	98.18%	$ 13,328,942.00	$ -	$ 54,157.01
MOBILE COUNTY	AL	$ 586,571.00	99.76%	$ 586,571.00	$ -	$ 462.21
ARKANSAS	AR	$ 10,530,746.00	93.42%	$ 10,271,598.46	$ 259,147.54	$ 185,006.76
LITTLE ROCK	AR	$ 682,197.00	98.73%	$ 673,518.99	$ 8,678.01	$ 2,466.88
AMERICAN SAMOA	AS	$ 412,935.00	99.31%	$ 412,935.00	$ -	$ 686.39
PIMA COUNTY	AZ	$ 1,063,430.00	77.96%	$ 928,985.86	$ 134,444.14	$ 61,452.38
CONSORTIUM	AZ	$ 900,303.00	79.44%	$ 745,349.28	$ 154,953.72	$ 49,829.01
HOUSING /ARIZONA	AZ	$ 7,033,520.00	86.34%	$ 6,790,338.24	$ 243,181.76	$ 187,296.12
TUCSON CONSORTIUM	AZ	$ 2,534,340.00	88.74%	$ 2,484,143.45	$ 50,196.55	$ 74,823.05
PHOENIX	AZ	$ 6,996,243.00	91.81%	$ 6,996,243.00	$ -	$ 158,480.62
TEMPE	AZ	$ 661,474.00	92.53%	$ 661,474.00	$ -	$ 13,304.80
CHANDLER	AZ	$ 575,271.00	94.42%	$ 575,271.00	$ -	$ 8,647.79
MESA	AZ	$ 1,405,094.00	98.12%	$ 1,379,188.99	$ 25,905.01	$ 7,123.99
GLENDALE	AZ	$ 914,122.00	100.00%	$ 914,122.00	$ -	$ -
COMPTON	CA	$ 848,514.00	69.82%	$ 592,420.98	$ 256,093.02	$ 61,334.61
ORANGE	CA	$ 545,636.00	70.29%	$ 457,313.34	$ 88,322.66	$ 38,224.87
COUNTY	CA	$ 717,484.00	73.41%	$ 539,779.67	$ 177,704.33	$ 52,744.81
EL MONTE	CA	$ 1,110,506.00	75.74%	$ 870,846.12	$ 239,659.88	$ 66,624.35
COUNTY	CA	$ 1,460,619.00	76.94%	$ 1,207,317.37	$ 253,301.63	$ 88,334.75
HAYWARD	CA	$ 703,342.00	78.92%	$ 703,342.00	$ -	$ 39,918.18
KERN COUNTY	CA	$ 2,076,503.00	79.75%	$ 2,076,503.00	$ -	$ 100,708.60
FONTANA	CA	$ 783,380.00	80.23%	$ 628,506.29	$ 154,873.71	$ 34,637.81
RIVERSIDE COUNTY	CA	$ 4,276,900.00	81.49%	$ 3,868,633.61	$ 408,266.39	$ 189,619.01
FULLERTON	CA	$ 622,710.00	83.07%	$ 517,296.16	$ 105,413.84	$ 25,049.51
CONSORTIUM	CA	$ 802,915.00	83.20%	$ 731,200.25	$ 71,714.75	$ 36,313.55
STOCKTON	CA	$ 1,725,572.00	83.75%	$ 1,649,545.64	$ 76,026.36	$ 62,273.67
FRESNO COUNTY	CA	$ 1,634,630.00	83.84%	$ 1,592,038.79	$ 42,591.21	$ 69,282.92
COSTA MESA	CA	$ 560,237.00	84.19%	$ 541,892.85	$ 18,344.15	$ 19,528.16
BALDWIN PARK	CA	$ 605,041.00	84.27%	$ 605,041.00	$ -	$ 22,791.88
GARDEN GROVE	CA	$ 1,068,707.00	84.45%	$ 1,068,707.00	$ -	$ 39,493.23
SANTA ANA	CA	$ 2,831,989.00	84.63%	$ 2,811,029.66	$ 20,959.34	$ 98,052.59
LYNWOOD	CA	$ 646,575.00	84.86%	$ 646,575.00	$ -	$ 22,216.22
OAKLAND	CA	$ 3,458,120.00	85.64%	$ 3,262,684.24	$ 195,435.76	$ 137,299.33
PASADENA	CA	$ 908,395.00	85.79%	$ 832,776.90	$ 75,618.11	$ 29,085.81
FRESNO	CA	$ 3,130,746.00	85.96%	$ 3,104,805.04	$ 25,940.96	$ 115,244.52
FREMONT	CA	$ 682,331.00	86.04%	$ 682,331.00	$ -	$ 25,640.85
SAN DIEGO	CA	$ 6,168,104.00	86.11%	$ 5,799,495.24	$ 368,608.76	$ 191,673.70
MODESTO	CA	$ 966,016.00	86.24%	$ 938,062.65	$ 27,953.35	$ 34,857.13
SAN FRANCISCO	CA	$ 8,757,780.00	86.53%	$ 8,313,504.83	$ 444,275.17	$ 326,190.56
LONG BEACH	CA	$ 3,566,451.00	86.88%	$ 3,566,451.00	$ -	$ 106,188.55
HUNTINGTON BEACH	CA	$ 566,611.00	87.15%	$ 533,877.08	$ 32,733.92	$ 16,657.13
COUNTY	CA	$ 3,040,382.00	87.22%	$ 3,040,382.00	$ -	$ 86,869.54
WESTMINSTER	CA	$ 511,454.00	87.47%	$ 511,454.00	$ -	$ 14,650.32

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Attachment D

Disbursements/Three Year (100%) Expenditure Deadline Trend
Analysis with Projections (based on previous 12 weeks)
Sorted by Grantee State and % of Funds Drawn (as of 4/16/12)

HPRP Grantee	State/ Terr	HPRP Authorized Amount	% of Funds Drawn	Projected Total Draws at 3 Years	Gap or Projected Gap in Meeting 3 Year 100% Expenditure Deadline	Approximate monthly draw to meet 3-year 100% requirement
GLENDALE	CA	$ 1,346,899.00	87.63%	$ 1,285,301.86	$ 61,597.14	$ 41,190.82
CALIFORNIA	CA	$ 44,466,877.00	87.70%	$ 44,466,877.00	$ -	$ 1,109,337.78
COUNTY	CA	$ 855,184.00	87.72%	$ 831,671.64	$ 23,512.36	$ 23,844.65
HUNTINGTON PARK	CA	$ 656,002.00	87.85%	$ 580,935.96	$ 75,066.04	$ 19,704.07
POMONA	CA	$ 1,164,766.00	88.61%	$ 1,104,997.40	$ 59,768.60	$ 29,885.76
BERKELEY	CA	$ 1,332,952.00	88.95%	$ 1,332,952.00	$ -	$ 39,661.09
SAN JOSE	CA	$ 4,128,763.00	89.09%	$ 3,739,574.77	$ 389,188.23	$ 124,612.77
SALINAS	CA	$ 1,013,978.00	89.12%	$ 994,920.78	$ 19,057.22	$ 29,173.90
RIVERSIDE	CA	$ 1,383,070.00	89.16%	$ 1,351,103.18	$ 31,966.82	$ 35,895.50
ALAMEDA	CA	$ 552,208.00	89.30%	$ 552,208.00	$ -	$ 15,902.05
VENTURA COUNTY CONSORTIUM	CA	$ 826,094.00	89.56%	$ 776,743.48	$ 49,350.52	$ 19,575.84
MORENO VALLEY	CA	$ 732,872.00	89.58%	$ 685,025.34	$ 47,846.66	$ 18,285.33
RICHMOND	CA	$ 559,735.00	89.73%	$ 559,735.00	$ -	$ 15,078.49
COUNTY	CA	$ 829,013.00	90.09%	$ 829,013.00	$ -	$ 18,781.02
CHULA VISTA	CA	$ 819,738.00	90.20%	$ 798,612.25	$ 21,125.75	$ 18,096.99
ANAHEIM	CA	$ 2,046,908.00	90.53%	$ 2,046,908.00	$ -	$ 45,690.19
NORWALK	CA	$ 633,782.00	90.77%	$ 633,782.00	$ -	$ 13,180.13
STANISLAUS COUNTY	CA	$ 1,023,163.00	90.84%	$ 1,021,859.09	$ 1,303.91	$ 24,571.09
LOS ANGELES	CA	$ 29,446,304.00	91.38%	$ 27,649,119.00	$ 1,797,185.00	$ 571,996.01
ALHAMBRA	CA	$ 567,605.00	91.78%	$ 564,231.32	$ 3,373.68	$ 11,174.65
OXNARD	CA	$ 1,124,994.00	92.08%	$ 1,124,994.00	$ -	$ 20,388.97
ONTARIO	CA	$ 997,869.00	92.39%	$ 997,869.00	$ -	$ 17,906.36
PALMDALE	CA	$ 615,530.00	93.15%	$ 615,530.00	$ -	$ 9,499.88
DALY CITY	CA	$ 510,070.00	93.71%	$ 510,070.00	$ -	$ 8,867.62
OCEANSIDE	CA	$ 742,791.00	94.09%	$ 709,730.97	$ 33,060.03	$ 10,353.37
IRVINE	CA	$ 540,656.00	94.16%	$ 509,057.63	$ 31,598.37	$ 7,508.73
SANTA MARIA	CA	$ 521,839.00	94.72%	$ 521,839.00	$ -	$ 6,206.32
EL CAJON	CA	$ 512,686.00	95.03%	$ 512,686.00	$ -	$ 6,006.42
RIALTO	CA	$ 546,485.00	95.23%	$ 546,485.00	$ -	$ 6,147.51
SOUTH GATE	CA	$ 865,273.00	95.36%	$ 865,273.00	$ -	$ 9,182.96
ORANGE COUNTY	CA	$ 1,556,026.00	95.52%	$ 1,556,026.00	$ -	$ 15,693.28
LANCASTER	CA	$ 564,646.00	95.71%	$ 540,435.92	$ 24,210.08	$ 5,454.74
COUNTY	CA	$ 1,421,551.00	96.05%	$ 1,421,551.00	$ -	$ 14,363.96
BAKERSFIELD	CA	$ 1,372,351.00	96.14%	$ 1,372,351.00	$ -	$ 12,678.54
LOS ANGELES COUNTY	CA	$ 12,197,108.00	97.13%	$ 12,197,108.00	$ -	$ 83,948.39
DOWNEY	CA	$ 611,834.00	97.50%	$ 596,539.00	$ 15,295.00	$ 3,663.17
SAN DIEGO COUNTY CONSORTIUM	CA	$ 1,925,974.00	97.58%	$ 1,896,711.63	$ 29,262.37	$ 10,415.23
SACRAMENTO COUNTY	CA	$ 2,396,773.00	97.61%	$ 2,368,135.21	$ 28,637.79	$ 15,418.54
CONSORTIUM	CA	$ 1,166,526.00	97.89%	$ 1,166,526.00	$ -	$ 6,796.17
ESCONDIDO	CA	$ 709,782.00	98.27%	$ 709,782.00	$ -	$ 2,888.05
SANTA MONICA	CA	$ 553,576.00	98.62%	$ 545,958.82	$ 7,617.18	$ 1,678.91
SACRAMENTO	CA	$ 2,375,126.00	98.79%	$ 2,375,126.00	$ -	$ 7,710.79
SAN BERNARDINO	CA	$ 1,455,066.00	99.96%	$ 1,455,066.00	$ -	$ 97.95
INGLEWOOD	CA	$ 918,344.00	100.00%	$ 918,344.00	$ -	$ -
SONOMA COUNTY	CA	$ 817,572.00	100.00%	$ 817,572.00	$ -	$ -
HAWTHORNE	CA	$ 703,261.00	100.00%	$ 703,261.00	$ -	$ -
MARIN COUNTY	CA	$ 659,106.00	100.00%	$ 659,106.00	$ -	$ -
SANTA ROSA	CA	$ 516,527.00	100.00%	$ 516,527.00	$ -	$ -
MERCED	CA	$ 515,203.00	100.00%	$ 515,203.00	$ -	$ -
SUNNYVALE	CA	$ 508,191.00	100.00%	$ 508,191.00	$ -	$ -

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HPRP Grantee	State/ Terr	HPRP Authorized Amount	% of Funds Drawn	Projected Total Draws at 3 Years	Gap or Projected Gap in Meeting 3 Year 100% Expenditure Deadline	Approximate monthly draw to meet 3-year 100% requirement
COLORADO	CO	$ 8,154,036.00	81.23%	$ 7,100,989.09	$ 1,053,046.91	$ 485,048.71
CONSORTIUM	CO	$ 836,047.00	85.46%	$ 801,809.66	$ 34,237.34	$ 38,518.57
PUEBLO CONSORTIUM	CO	$ 678,970.00	86.19%	$ 585,227.08	$ 93,742.92	$ 29,701.53
DENVER	CO	$ 3,769,259.00	95.96%	$ 3,769,259.00	$ -	$ 48,219.50
COLORADO SPRINGS	CO	$ 1,043,089.00	99.83%	$ 1,043,089.00	$ -	$ 595.71
AURORA	CO	$ 1,009,717.00	100.00%	$ 1,009,717.00	$ -	$ -
BRIDGEPORT	CT	$ 1,351,004.00	86.59%	$ 1,189,969.67	$ 161,034.33	$ 57,994.84
WATERBURY	CT	$ 931,128.00	89.86%	$ 861,763.58	$ 69,364.42	$ 29,929.00
NEW BRITAIN	CT	$ 772,694.00	90.74%	$ 721,342.34	$ 51,351.66	$ 22,916.62
CONNECTICUT	CT	$ 10,818,309.00	90.83%	$ 10,818,309.00	$ -	$ 295,815.73
NEW HAVEN	CT	$ 1,514,570.00	96.19%	$ 1,514,570.00	$ -	$ 18,465.89
HARTFORD	CT	$ 1,572,727.00	100.00%	$ 1,572,727.00	$ -	$ -
WASHINGTON, DC	DC	$ 7,489,476.00	67.12%	$ 5,460,553.74	$ 2,028,922.26	$ 748,994.05
DELAWARE	DE	$ 934,980.00	92.83%	$ 867,980.00	$ 67,000.00	$ 14,556.55
WILMINGTON	DE	$ 1,008,057.00	99.89%	$ 1,008,057.00	$ -	$ 246.52
NEW CASTLE COUNTY	DE	$ 978,285.00	99.98%	$ 978,285.00	$ -	$ 33.28
COLLIER COUNTY	FL	$ 888,850.00	76.01%	$ 744,088.29	$ 144,761.71	$ 69,010.16
MIAMI BEACH	FL	$ 715,418.00	86.16%	$ 659,547.79	$ 55,870.21	$ 32,377.51
MARION COUNTY	FL	$ 727,072.00	87.09%	$ 674,131.47	$ 52,940.53	$ 30,362.86
FORT LAUDERDALE	FL	$ 852,872.00	87.27%	$ 852,872.00	$ -	$ 35,508.39
MIAMI GARDENS	FL	$ 567,612.00	87.62%	$ 520,255.18	$ 47,356.82	$ 22,984.81
MIAMI	FL	$ 3,392,918.00	88.44%	$ 3,146,879.60	$ 246,038.40	$ 128,287.92
ORLANDO	FL	$ 921,665.00	90.81%	$ 909,532.50	$ 12,132.50	$ 27,394.03
DADE COUNTY	FL	$ 7,468,222.00	90.93%	$ 7,010,878.32	$ 457,343.68	$ 221,625.43
HOLLYWOOD	FL	$ 625,671.00	91.08%	$ 619,183.25	$ 6,487.75	$ 18,243.84
PASCO COUNTY	FL	$ 1,055,241.00	92.63%	$ 1,055,241.00	$ -	$ 25,181.18
VOLUSIA COUNTY	FL	$ 805,614.00	93.47%	$ 805,614.00	$ -	$ 17,017.91
SARASOTA COUNTY	FL	$ 581,819.00	93.79%	$ 581,819.00	$ -	$ 11,689.25
HILLSBOROUGH COUNTY	FL	$ 2,458,811.00	93.80%	$ 2,346,555.22	$ 112,255.78	$ 49,322.56
PALM BEACH COUNTY	FL	$ 2,823,871.00	94.04%	$ 2,804,869.38	$ 19,001.62	$ 55,022.42
NORTH MIAMI	FL	$ 507,641.00	94.58%	$ 507,098.03	$ 542.97	$ 8,996.90
BREVARD COUNTY CONSORTIUM	FL	$ 644,208.00	95.38%	$ 614,420.52	$ 29,787.48	$ 9,638.68
TAMPA	FL	$ 1,538,393.00	96.14%	$ 1,487,340.17	$ 51,052.83	$ 19,214.91
SEMINOLE COUNTY	FL	$ 991,180.00	96.77%	$ 991,180.00	$ -	$ 10,344.70
JACKSONVILLE / DUVAL COUNTY	FL	$ 2,779,039.00	98.02%	$ 2,724,025.98	$ 55,013.02	$ 17,801.20
LEE COUNTY	FL	$ 881,538.00	98.74%	$ 870,413.15	$ 11,124.85	$ 3,638.50
CONSORTIUM	FL	$ 855,417.00	98.83%	$ 845,391.65	$ 10,025.35	$ 3,244.02
GAINESVILLE	FL	$ 567,404.00	99.60%	$ 565,158.32	$ 2,245.68	$ 726.66
FINANCE	FL	$ 21,507,109.00	99.66%	$ 21,433,659.32	$ 73,449.68	$ 23,766.96
CONSORTIUM	FL	$ 1,237,464.00	99.89%	$ 1,236,084.95	$ 1,379.05	$ 446.24
ORANGE COUNTY	FL	$ 2,523,982.00	99.94%	$ 2,523,982.00	$ -	$ 491.38
CONSORTIUM	FL	$ 1,579,569.00	99.94%	$ 1,579,569.00	$ -	$ 286.26
HIALEAH	FL	$ 1,734,021.00	100.00%	$ 1,734,021.00	$ -	$ -
POLK COUNTY	FL	$ 1,222,920.00	100.00%	$ 1,222,920.00	$ -	$ -
ST. PETERSBURG	FL	$ 914,999.00	100.00%	$ 914,999.00	$ -	$ -
TALLAHASSEE	FL	$ 784,267.00	100.00%	$ 784,267.00	$ -	$ -
MANATEE COUNTY	FL	$ 635,485.00	100.00%	$ 635,485.00	$ -	$ -
POMPANO BEACH	FL	$ 507,694.00	100.00%	$ 507,694.00	$ -	$ -

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SAVANNAH	GA	$ 1,121,523.00	79.65%	$ 948,082.93	$ 173,440.08	$ 73,082.43
COLUMBUS	GA	$ 740,907.00	86.55%	$ 710,806.77	$ 30,100.23	$ 31,903.13
ATLANTA	GA	$ 3,441,091.00	92.33%	$ 3,401,128.77	$ 39,962.23	$ 84,514.78
ATHENS	GA	$ 604,969.00	92.90%	$ 600,258.11	$ 4,710.89	$ 13,758.93
DEKALB COUNTY	GA	$ 2,359,998.00	94.13%	$ 2,326,325.85	$ 33,672.15	$ 44,379.75
CONSORTIUM	GA	$ 896,069.00	95.62%	$ 896,069.00	$ -	$ 12,559.01
AUGUSTA	GA	$ 927,319.00	96.76%	$ 927,319.00	$ -	$ 9,626.38
CONSORTIUM	GA	$ 1,337,048.00	96.78%	$ 1,293,999.91	$ 43,048.09	$ 13,782.94
GEORGIA	GA	$ 19,084,426.00	97.35%	$ 19,084,426.00	$ -	$ 162,204.40
GWINNETT COUNTY	GA	$ 1,713,730.00	98.91%	$ 1,713,730.00	$ -	$ 5,971.04
CLAYTON COUNTY	GA	$ 856,410.00	100.00%	$ 856,410.00	$ -	$ -
MACON	GA	$ 541,299.00	100.00%	$ 541,299.00	$ -	$ -
GUAM	GU	$ 1,221,922.00	100.00%	$ 1,221,922.00	$ -	$ -
HONOLULU	HI	$ 4,016,074.00	89.50%	$ 3,928,665.93	$ 87,408.07	$ 144,158.40
HAWAII	HI	$ 2,166,888.00	90.45%	$ 2,158,499.13	$ 8,388.87	$ 57,238.26
CONSORTIUM	IA	$ 779,497.00	87.24%	$ 779,497.00	$ -	$ 32,520.15
IOWA	IA	$ 11,866,889.00	93.33%	$ 11,750,294.51	$ 116,594.49	$ 258,934.12
DES MOINES	IA	$ 1,763,874.00	94.26%	$ 1,763,874.00	$ -	$ 33,092.03
DUBUQUE	IA	$ 502,294.00	96.67%	$ 502,294.00	$ -	$ 5,468.43
CEDAR RAPIDS	IA	$ 536,843.00	100.00%	$ 536,843.00	$ -	$ 3.10
DAVENPORT	IA	$ 711,923.00	100.00%	$ 711,923.00	$ -	$ -
WATERLOO	IA	$ 570,881.00	100.00%	$ 570,881.00	$ -	$ -
FINANCE	ID	$ 4,438,807.00	91.08%	$ 4,303,255.36	$ 135,551.65	$ 95,533.18
BOISE	ID	$ 533,411.00	98.14%	$ 533,411.00	$ -	$ 2,122.41
ROCKFORD	IL	$ 861,073.00	75.65%	$ 680,315.57	$ 180,757.43	$ 63,776.49
CICERO	IL	$ 581,065.00	76.37%	$ 443,756.33	$ 137,308.67	$ 44,430.55
MCHENRY COUNTY	IL	$ 540,732.00	76.62%	$ 469,402.98	$ 71,329.02	$ 31,525.70
BERWYN	IL	$ 559,545.00	82.01%	$ 458,862.00	$ 100,683.00	$ 33,287.40
CONSORTIUM	IL	$ 586,413.00	82.28%	$ 519,146.99	$ 67,266.01	$ 33,624.92
MADISON COUNTY	IL	$ 566,987.00	86.88%	$ 538,638.70	$ 28,348.30	$ 24,597.59
CHICAGO	IL	$ 34,356,259.00	89.76%	$ 34,336,816.49	$ 19,442.51	$ 1,070,083.94
EAST ST. LOUIS	IL	$ 750,339.00	90.48%	$ 678,912.50	$ 71,426.50	$ 21,299.57
OAK PARK	IL	$ 796,581.00	91.88%	$ 760,534.87	$ 36,046.13	$ 20,942.89
CONSORTIUM	IL	$ 4,121,046.00	91.88%	$ 4,121,046.00	$ -	$ 84,802.14
EVANSTON	IL	$ 801,460.00	94.91%	$ 764,108.88	$ 37,351.12	$ 13,204.70
SPRINGFIELD	IL	$ 516,191.00	96.07%	$ 510,280.75	$ 5,910.25	$ 6,168.23
CONSORTIUM	IL	$ 1,057,106.00	96.20%	$ 1,057,106.00	$ -	$ 13,293.03
ILLINOIS	IL	$ 20,286,504.00	96.34%	$ 20,178,949.88	$ 107,554.12	$ 245,352.92
AURORA	IL	$ 506,883.00	96.94%	$ 506,883.00	$ -	$ 4,723.59
DUPAGE COUNTY CONSORTIUM	IL	$ 1,443,723.00	98.92%	$ 1,443,723.00	$ -	$ 5,391.56
DECATUR	IL	$ 623,309.00	99.53%	$ 620,375.04	$ 2,933.96	$ 949.38
PEORIA	IL	$ 790,404.00	100.00%	$ 790,404.00	$ -	$ -
WILL COUNTY	IL	$ 602,271.00	100.00%	$ 602,271.00	$ -	$ -
KANE COUNTY	IL	$ 517,394.00	100.00%	$ 517,394.00	$ -	$ -
TERRE HAUTE	IN	$ 760,163.00	76.97%	$ 612,294.77	$ 147,868.23	$ 52,194.85
GARY	IN	$ 1,498,882.00	79.33%	$ 1,227,775.12	$ 271,106.88	$ 95,208.54

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EVANSVILLE	IN	$ 1,217,598.00	84.45%	$ 1,028,237.61	$ 189,360.39	$ 64,715.86
FORT WAYNE	IN	$ 874,319.00	85.59%	$ 762,904.44	$ 111,414.56	$ 43,048.81
ST. JOSEPH COUNTY CONSRTIUM	IN	$ 1,148,607.00	89.21%	$ 1,115,513.30	$ 33,093.70	$ 38,088.49
EAST CHICAGO	IN	$ 559,073.00	90.90%	$ 517,107.62	$ 41,965.38	$ 15,178.65
INDIANAPOLIS	IN	$ 3,942,177.00	92.34%	$ 3,862,018.75	$ 80,158.25	$ 103,208.02
INDIANA	IN	$ 16,883,827.00	92.37%	$ 16,789,322.33	$ 94,504.67	$ 440,044.19
LAKE COUNTY	IN	$ 550,643.00	94.90%	$ 550,643.00	$ -	$ 8,286.81
HAMMOND	IN	$ 948,137.00	100.00%	$ 948,137.00	$ -	$ -
KANSAS CITY	KS	$ 1,003,797.00	90.07%	$ 1,003,797.00	$ -	$ 30,614.84
TOPEKA	KS	$ 816,686.00	95.70%	$ 807,319.04	$ 9,366.96	$ 10,565.57
WICHITA	KS	$ 1,168,490.00	96.33%	$ 1,126,635.28	$ 41,854.72	$ 12,927.18
KANSAS	KS	$ 8,360,995.00	97.15%	$ 8,360,995.00	$ -	$ 71,711.01
COVINGTON	KY	$ 679,522.00	84.84%	$ 644,633.33	$ 34,888.67	$ 35,595.19
LOUISVILLE - JEFFERSON COUNTY	KY	$ 4,870,830.00	87.58%	$ 4,870,830.00	$ -	$ 209,167.06
KENTUCKY	KY	$ 12,157,352.00	92.60%	$ 12,157,352.00	$ -	$ 268,299.66
URBAN COUNTY	KY	$ 849,668.00	93.30%	$ 811,459.48	$ 38,208.52	$ 19,662.77
CONSORTIUM	LA	$ 1,469,179.00	72.90%	$ 1,071,041.00	$ 398,138.00	$ 110,091.19
LOUISIANA	LA	$ 13,541,639.00	85.09%	$ 12,416,880.07	$ 1,124,758.93	$ 558,425.92
LAFAYETTE	LA	$ 672,893.00	85.79%	$ 634,532.24	$ 38,360.76	$ 26,448.33
BATON ROUGE	LA	$ 1,734,745.00	85.99%	$ 1,679,880.16	$ 54,864.84	$ 60,602.04
NEW ORLEANS	LA	$ 7,578,168.00	91.84%	$ 7,425,983.96	$ 152,184.04	$ 171,088.04
HOUMA	LA	$ 507,405.00	96.61%	$ 495,318.28	$ 12,086.72	$ 4,794.71
SHREVEPORT	LA	$ 1,072,168.00	97.86%	$ 1,072,168.00	$ -	$ 6,358.16
LOWELL	MA	$ 979,048.00	86.28%	$ 912,132.14	$ 66,915.86	$ 40,439.90
WORCESTER	MA	$ 1,904,831.00	87.41%	$ 1,665,088.90	$ 239,742.10	$ 71,491.72
BOSTON	MA	$ 8,209,151.00	89.76%	$ 8,053,299.99	$ 155,851.01	$ 253,182.69
PITTSFIELD	MA	$ 613,738.00	90.45%	$ 613,738.00	$ -	$ 17,659.77
MEDFORD	MA	$ 716,681.00	90.76%	$ 683,814.32	$ 32,866.68	$ 19,757.45
CONSORTIUM	MA	$ 636,677.00	93.42%	$ 636,677.00	$ -	$ 12,486.60
MASSACHUSETTS	MA	$ 18,443,744.00	93.69%	$ 17,845,761.92	$ 597,982.08	$ 346,857.17
LYNN	MA	$ 1,033,392.00	93.84%	$ 1,033,392.00	$ -	$ 18,995.62
CAMBRIDGE	MA	$ 1,302,128.00	94.36%	$ 1,302,128.00	$ -	$ 17,454.16
ARLINGTON	MA	$ 533,800.00	94.84%	$ 527,489.72	$ 6,310.28	$ 7,482.36
QUINCY CONSORTIUM	MA	$ 848,274.00	95.01%	$ 848,274.00	$ -	$ 12,737.61
BROOKLINE	MA	$ 667,436.00	95.62%	$ 667,436.00	$ -	$ 8,724.90
NEW BEDFORD	MA	$ 1,228,020.00	95.73%	$ 1,223,854.26	$ 4,165.74	$ 15,619.28
BROCKTON	MA	$ 610,110.00	96.14%	$ 586,578.43	$ 23,531.57	$ 7,017.18
LAWRENCE	MA	$ 710,503.00	97.15%	$ 710,503.00	$ -	$ 6,105.73
SOMERVILLE	MA	$ 1,181,067.00	97.28%	$ 1,181,067.00	$ -	$ 9,659.11
SPRINGFIELD	MA	$ 1,700,802.00	98.04%	$ 1,700,802.00	$ -	$ 10,028.87
CONSORTIUM	MA	$ 923,339.00	99.17%	$ 921,255.27	$ 2,083.73	$ 2,287.05
CHICOPEE	MA	$ 531,528.00	99.81%	$ 530,528.41	$ 999.59	$ 301.03
FALL RIVER	MA	$ 1,232,852.00	100.00%	$ 1,232,852.00	$ -	$ -
CONSORTIUM	MA	$ 551,671.00	100.00%	$ 551,671.00	$ -	$ -
COUNTY	MD	$ 2,512,242.00	74.90%	$ 2,204,134.70	$ 308,107.30	$ 191,793.41
BALTIMORE	MD	$ 9,523,896.00	76.86%	$ 7,319,949.39	$ 2,203,946.61	$ 720,824.83

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HPRP Grantee	State/ Terr	HPRP Authorized Amount	% of Funds Drawn	Projected Total Draws at 3 Years	Gap or Projected Gap in Meeting 3 Year 100% Expenditure Deadline	Approximate monthly draw to meet 3-year 100% requirement
BALTIMORE COUNTY	**MD**	$ 1,721,080.00	85.68%	$ 1,608,846.29	$ 112,233.71	$ 80,614.10
MARYLAND	**MD**	$ 5,680,393.00	89.35%	$ 5,185,600.11	$ 494,792.89	$ 197,838.59
ANNE ARUNDEL COUNTY	**MD**	$ 865,183.00	93.09%	$ 865,183.00	$ -	$ 19,540.02
COUNTY	**MD**	$ 2,104,743.00	95.61%	$ 2,104,743.00	$ -	$ 28,121.88
COUNTY	**ME**	$ 605,763.00	88.91%	$ 575,849.59	$ 29,913.41	$ 21,511.64
PORTLAND	**ME**	$ 876,120.00	96.61%	$ 876,120.00	$ -	$ 9,812.65
MAINE	**ME**	$ 6,575,089.00	98.83%	$ 6,575,089.00	$ -	$ 25,477.42
FLINT	**MI**	$ 1,763,839.00	79.85%	$ 1,664,002.11	$ 99,836.89	$ 101,038.65
PONTIAC	**MI**	$ 633,479.00	86.48%	$ 564,886.52	$ 68,592.48	$ 25,787.01
SAGINAW	**MI**	$ 1,022,177.00	88.14%	$ 991,210.54	$ 30,966.46	$ 26,919.82
BAY CITY	**MI**	$ 592,249.00	89.75%	$ 569,343.15	$ 22,905.85	$ 18,282.95
WAYNE COUNTY	**MI**	$ 2,308,510.00	89.77%	$ 2,308,510.00	$ -	$ 69,764.77
DETROIT	**MI**	$ 15,234,947.00	92.13%	$ 15,234,947.00	$ -	$ 383,958.87
KALAMAZOO	**MI**	$ 758,089.00	93.38%	$ 738,937.78	$ 19,151.22	$ 15,256.02
LANSING	**MI**	$ 898,823.00	96.11%	$ 898,823.00	$ -	$ 9,930.04
GENESEE COUNTY	**MI**	$ 756,066.00	96.17%	$ 756,066.00	$ -	$ 8,625.70
MICHIGAN	**MI**	$ 23,513,533.00	98.07%	$ 23,513,533.00	$ -	$ 146,946.02
JACKSON	**MI**	$ 568,942.00	99.84%	$ 568,942.00	$ -	$ 218.72
ROYAL OAK	**MI**	$ 558,226.00	99.96%	$ 558,017.60	$ 208.40	$ 67.43
GRAND RAPIDS	**MI**	$ 1,650,890.00	100.00%	$ 1,650,890.00	$ -	$ -
OAKLAND COUNTY	**MI**	$ 1,553,232.00	100.00%	$ 1,553,232.00	$ -	$ -
CONSORTIUM	**MI**	$ 687,708.00	100.00%	$ 687,708.00	$ -	$ -
KENT COUNTY	**MI**	$ 639,448.00	100.00%	$ 639,448.00	$ -	$ -
MINNEAPOLIS	**MN**	$ 5,520,902.00	83.50%	$ 4,908,782.04	$ 612,119.96	$ 294,814.19
CONSORTIUM	**MN**	$ 993,011.00	84.74%	$ 911,134.48	$ 81,876.52	$ 49,033.93
CONSORTIUM	**MN**	$ 704,252.00	85.78%	$ 693,864.94	$ 10,387.06	$ 34,233.65
CONSORTIUM	**MN**	$ 1,001,832.00	90.53%	$ 972,879.68	$ 28,952.32	$ 32,426.95
ST. PAUL	**MN**	$ 3,298,163.00	92.80%	$ 3,262,075.09	$ 36,087.91	$ 78,461.51
DULUTH	**MN**	$ 1,162,800.00	98.19%	$ 1,162,800.00	$ -	$ 7,191.01
MINNESOTA	**MN**	$ 10,865,236.00	100.00%	$ 10,865,236.00	$ -	$ -
MISSOURI	**MO**	$ 12,011,262.00	71.23%	$ 8,842,773.32	$ 3,168,488.68	$ 1,040,548.30
ST. LOUIS	**MO**	$ 8,156,188.00	77.33%	$ 6,664,138.42	$ 1,492,049.58	$ 520,851.68
ST. JOSEPH	**MO**	$ 727,371.00	87.00%	$ 637,798.71	$ 89,572.29	$ 28,470.27
KANSAS CITY	**MO**	$ 3,628,139.00	94.51%	$ 3,587,995.84	$ 40,143.16	$ 68,056.17
CONSORTIUM	**MO**	$ 2,188,751.00	95.69%	$ 2,188,751.00	$ -	$ 28,694.13
SPRINGFIELD	**MO**	$ 551,673.00	100.00%	$ 551,673.00	$ -	$ -
ISLANDS	**MP**	$ 589,165.00	97.45%	$ 584,434.29	$ 4,730.71	$ 5,142.89
MISSISSIPPI	**MS**	$ 13,348,427.00	96.77%	$ 13,299,736.82	$ 48,690.18	$ 150,723.03
JACKSON	**MS**	$ 1,031,154.00	99.17%	$ 1,031,154.00	$ -	$ 2,770.99
MONTANA STATE	**MT**	$ 3,731,327.00	97.12%	$ 3,711,400.06	$ 19,926.94	$ 35,145.88
RALEIGH	**NC**	$ 991,091.00	82.31%	$ 815,739.35	$ 175,351.65	$ 53,336.13
CONSORTIUM	**NC**	$ 748,097.00	83.00%	$ 661,847.04	$ 86,249.96	$ 38,681.92
CONSORTIUM	**NC**	$ 789,101.00	85.82%	$ 761,431.37	$ 27,669.63	$ 34,046.42
CONSORTIUM	**NC**	$ 509,460.00	86.19%	$ 490,957.48	$ 18,502.52	$ 21,395.92
NORTH CAROLINA	**NC**	$ 22,157,468.00	87.16%	$ 21,658,891.44	$ 498,576.56	$ 613,859.66
CONSORTIUM	**NC**	$ 1,930,217.00	92.67%	$ 1,930,217.00	$ -	$ 43,010.91
CONSORTIUM	**NC**	$ 781,141.00	93.35%	$ 774,760.89	$ 6,380.11	$ 15,802.92
FAYETTEVILLE	**NC**	$ 589,648.00	99.68%	$ 589,648.00	$ -	$ 582.61

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WAKE COUNTY	NC	$ 582,164.00	100.00%	$ 582,164.00	$ -	$ -
NORTH DAKOTA	ND	$ 2,582,637.00	97.16%	$ 2,582,637.00	$ -	$ 23,959.22
OMAHA CONSORTIUM	NE	$ 2,017,088.00	80.78%	$ 1,730,867.21	$ 286,220.79	$ 126,803.22
NEBRASKA	NE	$ 5,128,578.00	90.55%	$ 5,001,817.56	$ 126,760.44	$ 158,448.42
LINCOLN	NE	$ 726,148.00	92.62%	$ 726,148.00	$ -	$ 17,522.40
New Hampshire	NH	$ 4,612,322.00	89.14%	$ 4,466,754.88	$ 145,567.12	$ 139,814.73
MANCHESTER	NH	$ 766,545.00	96.61%	$ 763,978.60	$ 2,566.40	$ 7,256.34
PATERSON	NJ	$ 1,184,137.00	82.53%	$ 977,242.97	$ 206,894.03	$ 61,696.34
ATLANTIC CITY	NJ	$ 553,438.00	83.46%	$ 527,488.57	$ 25,949.43	$ 26,019.11
UNION CITY	NJ	$ 555,355.00	83.77%	$ 465,195.07	$ 90,159.93	$ 26,885.93
CAMDEN	NJ	$ 1,149,122.00	84.91%	$ 989,245.28	$ 159,876.72	$ 49,295.98
NEWARK	NJ	$ 3,533,348.00	86.09%	$ 3,126,973.07	$ 406,374.93	$ 150,988.89
CONSORTIUM	NJ	$ 2,169,536.00	88.93%	$ 2,011,199.95	$ 158,336.05	$ 71,645.86
CONSORTIUM	NJ	$ 545,890.00	92.54%	$ 516,699.62	$ 29,190.38	$ 10,146.32
JERSEY CITY	NJ	$ 2,676,991.00	93.47%	$ 2,676,991.00	$ -	$ 52,092.11
CONSORTIUM	NJ	$ 2,520,882.00	94.06%	$ 2,385,534.18	$ 135,347.82	$ 47,959.63
BERGEN COUNTY	NJ	$ 4,333,887.00	94.87%	$ 4,333,887.00	$ -	$ 71,220.09
SOMERSET COUNTY CONSORTIUM	NJ	$ 519,821.00	95.86%	$ 504,488.08	$ 15,332.92	$ 6,420.49
CLIFTON	NJ	$ 581,485.00	96.27%	$ 581,485.00	$ -	$ 6,937.58
NEW JERSEY	NJ	$ 10,221,710.00	97.06%	$ 10,221,710.00	$ -	$ 89,602.05
CONSORTIUM	NJ	$ 800,475.00	98.91%	$ 791,723.61	$ 8,751.39	$ 2,487.74
GLOUCESTER COUNTY	NJ	$ 581,762.00	98.97%	$ 578,820.23	$ 2,941.77	$ 1,839.50
BAYONNE	NJ	$ 779,080.00	99.10%	$ 772,075.17	$ 7,004.83	$ 1,991.25
TRENTON	NJ	$ 1,251,452.00	99.15%	$ 1,251,452.00	$ -	$ 3,190.57
ELIZABETH	NJ	$ 839,604.00	99.90%	$ 839,604.00	$ -	$ 258.73
CONSORTIUM	NJ	$ 931,156.00	99.95%	$ 930,661.25	$ 494.75	$ 152.01
CONSORTIUM	NJ	$ 1,057,935.00	100.00%	$ 1,057,933.18	$ 1.82	$ 0.50
CONSORTIUM	NJ	$ 1,535,992.00	100.00%	$ 1,535,992.00	$ -	$ -
MONMOUTH COUNTY CONSORTIUM	NJ	$ 1,240,040.00	100.00%	$ 1,240,040.00	$ -	$ -
EAST ORANGE	NJ	$ 693,362.00	100.00%	$ 693,362.00	$ -	$ -
CONSORTIUM	NJ	$ 663,041.00	100.00%	$ 663,041.00	$ -	$ -
NEW MEXICO	NM	$ 6,778,653.00	96.73%	$ 6,778,653.00	$ -	$ 60,718.57
ALBUQUERQUE	NM	$ 1,807,256.00	96.91%	$ 1,751,425.26	$ 55,830.74	$ 17,153.38
LAS VEGAS	NV	$ 2,105,118.00	87.30%	$ 2,005,549.95	$ 99,568.05	$ 73,914.11
NORTH LAS VEGAS	NV	$ 677,704.00	90.56%	$ 654,220.90	$ 23,483.10	$ 13,804.27
NEVADA	NV	$ 2,035,393.00	92.54%	$ 2,018,587.58	$ 16,805.42	$ 39,819.37
CONSORTIUM	NV	$ 2,595,173.00	93.42%	$ 2,595,173.00	$ -	$ 44,752.39
RENO CONSORTIUM	NV	$ 836,301.00	96.56%	$ 816,511.57	$ 19,789.43	$ 7,615.98
BINGHAMTON	NY	$ 955,655.00	72.14%	$ 706,378.48	$ 249,276.52	$ 80,195.19
UTICA	NY	$ 1,192,417.00	74.62%	$ 947,197.67	$ 245,219.33	$ 91,130.23
NEW YORK CITY	NY	$ 73,929,729.00	79.38%	$ 67,458,577.41	$ 6,471,151.59	$ 4,636,672.99
NASSAU COUNTY	NY	$ 6,458,352.00	82.26%	$ 5,394,018.89	$ 1,064,333.11	$ 348,576.12
ROCHESTER	NY	$ 3,954,235.00	82.81%	$ 3,867,915.23	$ 86,319.77	$ 204,749.15

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SYRACUSE	NY	$ 2,524,997.00	84.26%	$ 2,304,486.08	$ 220,510.92	$ 122,087.05
BABYLON TOWNSHIP	NY	$ 526,925.00	87.14%	$ 522,071.79	$ 4,853.21	$ 21,694.67
WESTCHESTER COUNTY	NY	$ 2,373,791.00	87.70%	$ 2,373,791.00	$ -	$ 103,233.62
BUFFALO	NY	$ 6,594,081.00	90.53%	$ 6,178,375.01	$ 415,705.99	$ 155,661.07
MOUNT VERNON	NY	$ 745,701.00	91.21%	$ 745,701.00	$ -	$ 20,767.59
ISLIP TOWNSHIP	NY	$ 840,437.00	92.08%	$ 821,505.45	$ 18,931.55	$ 20,254.79
ONONDAGA COUNTY CONSORTIUM	NY	$ 897,454.00	92.36%	$ 873,504.08	$ 23,949.92	$ 21,077.62
CONSORTIUM	NY	$ 1,048,938.00	92.84%	$ 1,048,938.00	$ -	$ 23,089.92
DUTCHESS COUNTY CONSORTIUM	NY	$ 654,862.00	93.13%	$ 609,862.00	$ 45,000.00	$ 14,561.17
NEW ROCHELLE	NY	$ 686,935.00	93.52%	$ 686,935.00	$ -	$ 14,110.75
NEW YORK	NY	$ 26,951,329.00	93.71%	$ 26,177,270.54	$ 774,058.46	$ 433,595.26
TONAWANDA	NY	$ 772,574.00	94.41%	$ 737,760.95	$ 34,813.05	$ 13,272.65
SUFFOLK COUNTY CONSORTIUM	NY	$ 1,511,657.00	96.02%	$ 1,511,657.00	$ -	$ 16,770.54
YONKERS	NY	$ 1,533,003.00	96.27%	$ 1,533,003.00	$ -	$ 15,953.11
JAMESTOWN	NY	$ 573,517.00	96.70%	$ 573,517.00	$ -	$ 5,700.09
CONSORTIUM	NY	$ 789,300.00	98.67%	$ 789,300.00	$ -	$ 3,171.77
ALBANY	NY	$ 1,523,772.00	100.00%	$ 1,523,772.00	$ -	$ -
CONSORTIUM	NY	$ 1,209,200.00	100.00%	$ 1,209,200.00	$ -	$ -
NIAGARA FALLS	NY	$ 1,037,411.00	100.00%	$ 1,037,411.00	$ -	$ -
ROCKLAND COUNTY	NY	$ 860,643.00	100.00%	$ 860,643.00	$ -	$ -
CONSORTIUM	NY	$ 713,117.00	100.00%	$ 713,117.00	$ -	$ -
ELMIRA	NY	$ 560,951.00	100.00%	$ 560,951.00	$ -	$ -
AKRON	OH	$ 2,790,522.00	75.73%	$ 2,171,191.28	$ 619,330.72	$ 183,939.59
CUYAHOGA COUNTY CONSORTIUM	OH	$ 1,552,324.00	78.59%	$ 1,404,752.99	$ 147,571.01	$ 90,240.71
HAMILTON	OH	$ 605,828.00	81.14%	$ 535,848.47	$ 69,979.53	$ 31,022.49
TOLEDO	OH	$ 3,275,494.00	81.69%	$ 3,025,647.40	$ 249,846.60	$ 162,882.30
FRANKLIN COUNTY	OH	$ 746,920.00	83.66%	$ 688,684.86	$ 58,235.14	$ 32,003.82
CINCINNATI	OH	$ 5,339,182.00	83.93%	$ 4,481,259.79	$ 857,922.21	$ 232,992.27
COLUMBUS	OH	$ 2,642,649.00	84.79%	$ 2,497,023.43	$ 145,625.57	$ 109,187.60
CLEVELAND	OH	$ 9,801,913.00	85.13%	$ 9,137,146.77	$ 664,766.23	$ 395,916.62
HAMILTON COUNTY	OH	$ 1,396,621.00	85.22%	$ 1,298,667.37	$ 97,953.63	$ 52,759.87
OHIO	OH	$ 26,205,724.00	88.33%	$ 25,797,663.09	$ 408,060.91	$ 659,452.88
CLEVELAND HEIGHTS	OH	$ 715,677.00	90.42%	$ 650,312.22	$ 65,364.78	$ 14,788.09
LAKE COUNTY	OH	$ 575,083.00	90.69%	$ 555,064.47	$ 20,018.53	$ 14,540.65
YOUNGSTOWN	OH	$ 1,610,332.00	91.38%	$ 1,610,332.00	$ -	$ 37,676.08
SPRINGFIELD	OH	$ 815,869.00	92.03%	$ 750,857.60	$ 65,011.40	$ 17,655.63
CANTON	OH	$ 1,183,577.00	94.27%	$ 1,140,134.70	$ 43,442.30	$ 18,422.10
LIMA	OH	$ 506,015.00	96.34%	$ 506,015.00	$ -	$ 4,142.95
CONSORTIUM	OH	$ 541,184.00	96.95%	$ 541,184.00	$ -	$ 4,482.50
LAKEWOOD	OH	$ 902,439.00	98.68%	$ 902,439.00	$ -	$ 3,234.90
LORAIN	OH	$ 502,230.00	99.22%	$ 498,299.85	$ 3,930.15	$ 1,067.34
DAYTON CONSORTIUM	OH	$ 2,595,505.00	99.31%	$ 2,595,505.00	$ -	$ 4,433.97
CONSORTIUM	OH	$ 589,412.00	99.38%	$ 589,412.00	$ -	$ 993.80

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MONTGOMERY COUNTY	OH	$ 759,496.00	100.00%	$ 759,496.00	$ -	$ -
OKLAHOMA CITY	OK	$ 2,161,404.00	87.34%	$ 2,063,042.89	$ 98,361.11	$ 87,596.27
OKLAHOMA	OK	$ 8,101,391.00	88.79%	$ 7,889,185.70	$ 212,205.30	$ 276,147.84
TULSA	OK	$ 1,513,504.00	98.56%	$ 1,497,444.59	$ 16,059.41	$ 6,617.42
TULSA COUNTY CONSORTIUM	OK	$ 521,635.00	99.66%	$ 521,635.00	$ -	$ 539.72
CLACKAMAS COUNTY	OR	$ 871,505.00	88.46%	$ 818,117.01	$ 53,387.99	$ 35,575.64
SALEM, OREGON	OR	$ 597,562.00	92.32%	$ 597,562.00	$ -	$ 16,047.73
OREGON	OR	$ 7,873,436.00	93.74%	$ 7,708,077.00	$ 165,359.00	$ 174,238.34
CONSORTIUM	OR	$ 567,404.00	98.13%	$ 556,794.65	$ 10,609.35	$ 3,396.85
PORTLAND CONSORTIUM	OR	$ 4,172,282.00	98.13%	$ 4,172,282.00	$ -	$ 21,767.71
COUNTY	OR	$ 824,990.00	100.00%	$ 824,990.00	$ -	$ -
MCKEESPORT	PA	$ 500,957.00	66.00%	$ 409,349.49	$ 91,607.51	$ 50,798.64
CHESTER COUNTY	PA	$ 1,130,871.00	74.60%	$ 843,634.84	$ 287,236.16	$ 63,772.02
BERKS COUNTY	PA	$ 1,109,659.00	76.43%	$ 932,466.29	$ 177,192.71	$ 58,490.13
READING	PA	$ 1,267,021.00	77.44%	$ 1,092,665.80	$ 174,355.20	$ 71,274.59
WILLIAMSPORT	PA	$ 518,859.00	82.78%	$ 512,818.97	$ 6,040.03	$ 19,409.39
BUCKS COUNTY	PA	$ 975,905.00	83.04%	$ 935,399.13	$ 40,505.87	$ 41,254.62
HARRISBURG	PA	$ 855,478.00	83.62%	$ 731,199.22	$ 124,278.78	$ 34,943.57
SCRANTON	PA	$ 1,401,868.00	83.74%	$ 1,334,316.25	$ 67,551.75	$ 51,731.33
LUZERNE COUNTY	PA	$ 2,057,026.00	84.39%	$ 1,737,653.70	$ 319,372.30	$ 71,804.19
COUNTY	PA	$ 1,514,639.00	86.16%	$ 1,453,222.85	$ 61,416.15	$ 46,532.02
PENNSYLVANIA	PA	$ 23,411,484.00	86.55%	$ 21,805,079.73	$ 1,606,404.27	$ 784,977.63
PHILADELPHIA	PA	$ 21,486,240.00	87.21%	$ 21,486,240.00	$ -	$ 628,693.81
DAUPHIN COUNTY	PA	$ 621,187.00	88.34%	$ 616,978.77	$ 4,208.23	$ 16,205.04
COUNTY	PA	$ 1,762,094.00	88.34%	$ 1,728,890.11	$ 33,203.89	$ 67,181.07
BEAVER COUNTY	PA	$ 1,596,719.00	89.47%	$ 1,593,242.04	$ 3,476.96	$ 51,680.97
WILKES-BARRE	PA	$ 794,109.00	90.15%	$ 715,915.00	$ 78,194.00	$ 17,882.71
LANCASTER	PA	$ 738,012.00	90.16%	$ 719,275.50	$ 18,736.50	$ 18,113.15
CONSORTIUM	PA	$ 6,714,064.00	90.95%	$ 6,714,064.00	$ -	$ 192,483.18
LANCASTER COUNTY	PA	$ 1,382,274.00	91.33%	$ 1,341,448.06	$ 40,825.94	$ 30,628.55
ALLENTOWN	PA	$ 1,129,049.00	92.02%	$ 1,129,049.00	$ -	$ 23,033.92
LEHIGH COUNTY	PA	$ 574,614.00	92.37%	$ 574,614.00	$ -	$ 10,936.83
BETHLEHEM	PA	$ 687,480.00	92.37%	$ 687,480.00	$ -	$ 11,651.26
PITTSBURGH	PA	$ 6,848,936.00	92.96%	$ 6,848,936.00	$ -	$ 143,757.45
ALTOONA	PA	$ 819,718.00	93.03%	$ 819,718.00	$ -	$ 18,091.07
JOHNSTOWN	PA	$ 644,490.00	94.50%	$ 644,278.16	$ 211.84	$ 9,294.34
ERIE	PA	$ 1,458,364.00	94.84%	$ 1,419,307.06	$ 39,056.94	$ 22,870.24
COUNTY	PA	$ 1,832,195.00	95.05%	$ 1,832,195.00	$ -	$ 28,752.13
COUNTY	PA	$ 558,742.00	98.90%	$ 558,742.00	$ -	$ 1,334.34
YORK COUNTY	PA	$ 1,074,741.00	99.27%	$ 1,074,741.00	$ -	$ 1,783.27
DELAWARE COUNTY	PA	$ 1,700,587.00	99.99%	$ 1,700,587.00	$ -	$ 50.68
YORK	PA	$ 693,600.00	100.00%	$ 693,600.00	$ -	$ 1.08
NORTHAMPTON COUNTY	PA	$ 738,192.00	100.00%	$ 738,192.00	$ -	$ 0.44
TOWNSHIP	PA	$ 797,813.00	100.00%	$ 797,813.00	$ -	$ -
CHESTER	PA	$ 586,664.00	100.00%	$ 586,664.00	$ -	$ -
ARECIBO	PR	$ 1,124,937.00	73.54%	$ 1,124,937.00	$ -	$ 87,899.74

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Attachment D

Disbursements/Three Year (100%) Expenditure Deadline Trend
Analysis with Projections (based on previous 12 weeks)
Sorted by Grantee State and % of Funds Drawn (as of 4/16/12)

HPRP Grantee	State/ Terr	HPRP Authorized Amount	% of Funds Drawn	Projected Total Draws at 3 Years	Gap or Projected Gap in Meeting 3 Year 100% Expenditure Deadline	Approximate monthly draw to meet 3-year 100% requirement
SAN SEBASTIAN	PR	$ 568,040.00	78.91%	$ 552,158.76	$ 15,881.24	$ 35,374.94
TOA BAJA	PR	$ 871,335.00	79.18%	$ 713,707.36	$ 157,627.64	$ 53,580.54
RIO GRANDE	PR	$ 587,542.00	80.28%	$ 536,637.54	$ 50,904.46	$ 34,550.96
GUAYNABO	PR	$ 786,550.00	81.10%	$ 729,782.71	$ 56,767.29	$ 44,321.72
CAGUAS	PR	$ 1,390,581.00	82.31%	$ 1,308,541.23	$ 82,039.77	$ 72,636.49
CAYEY	PR	$ 536,499.00	83.99%	$ 475,910.12	$ 60,588.88	$ 25,616.02
CAROLINA	PR	$ 1,596,195.00	84.75%	$ 1,481,811.53	$ 114,383.47	$ 72,581.05
PUERTO RICO	PR	$ 20,835,644.00	85.03%	$ 19,732,691.71	$ 1,102,952.29	$ 921,086.21
VEGA BAJA	PR	$ 706,348.00	85.43%	$ 653,666.22	$ 52,681.78	$ 30,398.45
BAYAMON	PR	$ 1,874,802.00	87.81%	$ 1,699,319.89	$ 175,482.11	$ 68,146.80
ISABELA	PR	$ 537,621.00	87.93%	$ 537,621.00	$ -	$ 20,566.51
YAUCO	PR	$ 601,387.00	88.32%	$ 555,686.06	$ 45,700.94	$ 20,745.86
CANOVANAS	PR	$ 548,313.00	88.78%	$ 513,651.24	$ 34,661.76	$ 18,339.91
SAN JUAN	PR	$ 4,253,787.00	89.89%	$ 3,935,911.23	$ 317,875.77	$ 127,024.93
MANATI	PR	$ 542,285.00	90.17%	$ 542,285.00	$ -	$ 15,743.81
MAYAGUEZ	PR	$ 1,168,388.00	90.51%	$ 1,168,388.00	$ -	$ 32,750.85
JUANA DIAZ	PR	$ 651,677.00	93.75%	$ 651,677.00	$ -	$ 12,024.33
TRUJILLO ALTO	PR	$ 643,815.00	93.87%	$ 621,774.31	$ 22,040.69	$ 11,647.79
HUMACAO	PR	$ 642,921.00	94.87%	$ 642,921.00	$ -	$ 9,738.67
PONCE	PR	$ 2,118,806.00	96.18%	$ 2,046,774.27	$ 72,031.73	$ 23,874.28
CABO ROJO	PR	$ 509,023.00	96.33%	$ 509,023.00	$ -	$ 5,520.09
AGUADILLA	PR	$ 764,657.00	98.01%	$ 764,657.00	$ -	$ 4,873.33
GUAYAMA	PR	$ 506,041.00	98.49%	$ 506,041.00	$ -	$ 2,249.36
TOA ALTA	PR	$ 635,194.00	98.76%	$ 635,194.00	$ -	$ 2,322.86
WOONSOCKET	RI	$ 545,802.00	83.46%	$ 511,354.64	$ 34,447.36	$ 27,188.86
RHODE ISLAND	RI	$ 3,282,670.00	88.85%	$ 3,262,785.82	$ 19,884.18	$ 109,159.08
PROVIDENCE	RI	$ 2,303,402.00	91.25%	$ 2,283,286.92	$ 20,115.08	$ 60,074.44
PAWTUCKET	RI	$ 845,934.00	95.70%	$ 838,103.95	$ 7,830.05	$ 10,946.48
COLUMBIA	SC	$ 524,731.00	72.79%	$ 381,935.28	$ 142,795.72	$ 48,801.91
SOUTH CAROLINA	SC	$ 11,136,176.00	93.19%	$ 10,937,439.57	$ 198,736.43	$ 248,124.19
RICHLAND COUNTY	SC	$ 568,201.00	94.56%	$ 537,315.87	$ 30,885.13	$ 10,101.32
HORRY COUNTY	SC	$ 622,075.00	94.83%	$ 592,663.35	$ 29,411.65	$ 9,781.95
CHARLESTON COUNTY	SC	$ 831,125.00	97.44%	$ 831,125.00	$ -	$ 7,037.50
GREENVILLE COUNTY	SC	$ 984,729.00	100.00%	$ 984,729.00	$ -	$ -
LEXINGTON COUNTY	SC	$ 588,970.00	100.00%	$ 588,970.00	$ -	$ -
COUNTY	SC	$ 532,752.00	100.00%	$ 532,752.00	$ -	$ -
HOUSING	SD	$ 3,254,060.00	85.77%	$ 3,254,060.00	$ -	$ 99,893.65
CHATTANOOGA	TN	$ 712,946.00	76.56%	$ 545,853.78	$ 167,092.22	$ 57,105.49
MEMPHIS	TN	$ 3,329,685.00	86.26%	$ 2,872,113.42	$ 457,571.58	$ 156,379.80
KNOXVILLE	TN	$ 771,803.00	94.13%	$ 771,803.00	$ -	$ 15,480.29
DAVIDSON	TN	$ 2,012,994.00	95.29%	$ 1,922,236.27	$ 90,757.73	$ 32,418.34
TENNESSEE	TN	$ 13,467,433.00	95.98%	$ 13,362,165.88	$ 105,267.12	$ 184,889.13
FORT WORTH	TX	$ 2,746,929.00	74.56%	$ 2,073,921.08	$ 673,007.92	$ 212,576.28
BROWNSVILLE	TX	$ 1,347,839.00	75.08%	$ 1,193,123.23	$ 154,715.77	$ 108,692.48

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Attachment D

Disbursements/Three Year (100%) Expenditure Deadline Trend
Analysis with Projections (based on previous 12 weeks)
Sorted by Grantee State and % of Funds Drawn (as of 4/16/12)

HPRP Grantee	State/ Terr	HPRP Authorized Amount	% of Funds Drawn	Projected Total Draws at 3 Years	Gap or Projected Gap in Meeting 3 Year 100% Expenditure Deadline	Approximate monthly draw to meet 3-year 100% requirement
IRVING	TX	$ 930,680.00	80.47%	$ 837,333.74	$ 93,346.26	$ 55,295.67
MCALLEN	TX	$ 733,518.00	81.81%	$ 600,079.35	$ 133,438.65	$ 43,178.29
WICHITA FALLS	TX	$ 583,425.00	82.44%	$ 529,754.42	$ 53,670.58	$ 33,155.97
HARRIS COUNTY	TX	$ 4,463,961.00	83.76%	$ 4,222,015.02	$ 241,945.98	$ 206,077.32
GALVESTON	TX	$ 585,604.00	86.00%	$ 569,758.42	$ 15,845.58	$ 25,967.03
BEXAR COUNTY	TX	$ 701,160.00	86.08%	$ 636,388.80	$ 64,771.20	$ 31,573.45
PASADENA	TX	$ 790,214.00	86.78%	$ 780,762.12	$ 9,451.88	$ 33,448.51
HOUSTON	TX	$ 12,375,861.00	88.58%	$ 11,674,669.51	$ 701,191.49	$ 397,979.45
HIDALGO COUNTY	TX	$ 3,463,905.00	89.57%	$ 3,463,905.00	$ -	$ 110,966.72
AMARILLO	TX	$ 739,071.00	89.92%	$ 709,603.73	$ 29,467.27	$ 24,113.62
GARLAND	TX	$ 858,997.00	90.76%	$ 779,635.08	$ 79,361.92	$ 24,139.25
PORT ARTHUR	TX	$ 564,089.00	91.01%	$ 558,562.44	$ 5,526.56	$ 14,410.09
BEAUMONT	TX	$ 741,325.00	91.48%	$ 741,325.00	$ -	$ 14,450.77
LUBBOCK	TX	$ 947,453.00	92.09%	$ 914,781.45	$ 32,671.55	$ 22,793.18
ARLINGTON	TX	$ 1,304,792.00	92.84%	$ 1,304,792.00	$ -	$ 26,793.55
EL PASO	TX	$ 3,492,976.00	92.87%	$ 3,369,900.82	$ 123,075.18	$ 79,757.22
COUNTY	TX	$ 741,614.00	94.18%	$ 741,614.00	$ -	$ 12,279.52
CONSORTIUM	TX	$ 1,156,125.00	96.35%	$ 1,156,125.00	$ -	$ 12,841.01
WACO	TX	$ 685,599.00	96.44%	$ 685,599.00	$ -	$ 8,079.22
DALLAS	TX	$ 7,187,357.00	96.57%	$ 7,187,357.00	$ -	$ 74,884.65
LAREDO	TX	$ 1,490,976.00	97.06%	$ 1,490,976.00	$ -	$ 14,165.57
CORPUS CHRISTI	TX	$ 1,393,181.00	99.14%	$ 1,393,181.00	$ -	$ 3,880.18
SAN ANTONIO	TX	$ 5,974,286.00	99.21%	$ 5,974,286.00	$ -	$ 15,303.51
TEXAS	TX	$ 41,472,772.00	99.88%	$ 41,472,772.00	$ -	$ 15,721.05
AUSTIN	TX	$ 3,062,820.00	100.00%	$ 3,062,820.00	$ -	$ -
DALLAS COUNTY	TX	$ 866,753.00	100.00%	$ 866,753.00	$ -	$ -
FORT BEND COUNTY	TX	$ 777,971.00	100.00%	$ 777,971.00	$ -	$ -
BRAZORIA COUNTY	TX	$ 707,747.00	100.00%	$ 707,747.00	$ -	$ -
GRAND PRAIRIE	TX	$ 569,746.00	100.00%	$ 569,746.00	$ -	$ -
PLANO	TX	$ 509,050.00	100.00%	$ 509,050.00	$ -	$ -
UTAH	UT	$ 5,021,811.00	89.23%	$ 4,807,785.08	$ 214,025.92	$ 171,356.33
PROVO CONSORTIUM	UT	$ 700,321.00	89.37%	$ 677,087.92	$ 23,233.08	$ 23,595.39
CONSORTIUM	UT	$ 1,005,916.00	91.05%	$ 1,005,916.00	$ -	$ 27,664.15
SALT LAKE CITY	UT	$ 1,680,347.00	98.87%	$ 1,680,347.00	$ -	$ 5,819.86
NORFOLK	VA	$ 2,097,079.00	77.36%	$ 1,932,333.08	$ 164,745.92	$ 144,398.93
FAIRFAX COUNTY	VA	$ 2,462,398.00	86.99%	$ 2,193,463.05	$ 268,934.95	$ 96,445.45
RICHMOND	VA	$ 2,044,088.00	87.87%	$ 1,858,878.65	$ 185,209.35	$ 78,548.57
CHESAPEAKE	VA	$ 507,406.00	91.32%	$ 504,035.52	$ 3,370.48	$ 13,536.09
COUNTY	VA	$ 789,775.00	96.31%	$ 765,338.37	$ 24,436.63	$ 8,864.48
ALEXANDRIA	VA	$ 512,214.00	96.44%	$ 507,849.45	$ 4,364.55	$ 5,547.50
VIRGINIA BEACH	VA	$ 1,010,599.00	96.93%	$ 1,010,599.00	$ -	$ 10,046.57
VIRGINIA	VA	$ 11,389,160.00	98.76%	$ 11,389,160.00	$ -	$ 37,266.80
HENRICO COUNTY	VA	$ 603,481.00	98.79%	$ 603,481.00	$ -	$ 2,314.05
ARLINGTON COUNTY	VA	$ 728,367.00	99.13%	$ 728,367.00	$ -	$ 1,928.71
ROANOKE	VA	$ 766,017.00	99.33%	$ 766,017.00	$ -	$ 1,539.24
PORTSMOUTH	VA	$ 724,490.00	100.00%	$ 724,490.00	$ -	$ -
NEWPORT NEWS	VA	$ 659,087.00	100.00%	$ 659,087.00	$ -	$ -
COUNTY	VA	$ 515,089.00	100.00%	$ 515,089.00	$ -	$ -
VIRGIN ISLANDS	VI	$ 775,978.00	88.66%	$ 714,765.43	$ 61,212.57	$ 28,162.50
VERMONT	VT	$ 3,398,824.00	97.98%	$ 3,330,184.00	$ 68,640.00	$ 24,276.74

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Attachment D

Disbursements/Three Year (100%) Expenditure Deadline Trend
Analysis with Projections (based on previous 12 weeks)
Sorted by Grantee State and % of Funds Drawn (as of 4/16/12)

HPRP Grantee	State/ Terr	HPRP Authorized Amount	% of Funds Drawn	Projected Total Draws at 3 Years	Gap or Projected Gap in Meeting 3 Year 100% Expenditure Deadline	Approximate monthly draw to meet 3-year 100% requirement
CONSORTIUM	WA	$ 1,863,675.00	84.29%	$ 1,863,675.00	$ -	$ 66,952.65
SPOKANE	WA	$ 1,564,373.00	84.69%	$ 1,491,798.61	$ 72,574.39	$ 68,073.45
TACOMA CONSORTIUM	WA	$ 1,182,824.00	89.08%	$ 1,182,824.00	$ -	$ 36,720.72
WASHINGTON	WA	$ 11,126,387.00	89.60%	$ 11,001,396.25	$ 124,990.75	$ 295,751.97
VANCOUVER	WA	$ 549,529.00	91.37%	$ 526,306.03	$ 23,222.97	$ 10,524.25
CONSORTIUM	WA	$ 559,180.00	91.80%	$ 556,921.04	$ 2,258.96	$ 12,336.63
SEATTLE	WA	$ 4,993,052.00	91.84%	$ 4,993,052.00	$ -	$ 91,848.64
SPOKANE COUNTY	WA	$ 622,278.00	96.13%	$ 622,278.00	$ -	$ 6,663.13
PIERCE COUNTY	WA	$ 1,224,641.00	97.97%	$ 1,212,728.71	$ 11,912.29	$ 6,869.18
CONSORTIUM	WA	$ 1,262,714.00	100.00%	$ 1,262,714.00	$ -	$ -
MILWAUKEE	WI	$ 6,912,159.00	86.36%	$ 6,339,064.75	$ 573,094.25	$ 283,904.42
CONSORTIUM	WI	$ 712,755.00	88.04%	$ 651,404.75	$ 61,350.25	$ 21,074.96
WEST ALLIS	WI	$ 574,434.00	90.27%	$ 534,644.33	$ 39,789.67	$ 16,830.01
RACINE	WI	$ 817,554.00	92.93%	$ 817,554.00	$ -	$ 17,419.37
WISCONSIN	WI	$ 17,101,862.00	99.09%	$ 17,013,329.55	$ 88,532.45	$ 47,693.03
MADISON	WI	$ 817,092.00	100.00%	$ 817,092.00	$ -	$ -
CONSORTIUM	WV	$ 606,447.00	85.48%	$ 569,419.30	$ 37,027.70	$ 27,058.45
CONSORTIUM	WV	$ 854,337.00	85.62%	$ 784,027.04	$ 70,309.96	$ 36,645.06
WEST VIRGINIA	WV	$ 7,977,649.00	90.22%	$ 7,608,498.88	$ 369,150.12	$ 247,260.25
CONSORTIUM	WV	$ 760,168.00	94.98%	$ 760,168.00	$ -	$ 11,502.39
WYOMING	WY	$ 1,718,313.00	88.61%	$ 1,584,759.65	$ 133,553.35	$ 63,994.22

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Community Spotlight: Rapid Re-Housing

Rapid Exit Program in Hennepin County, MN

Rapid Exit in Hennepin County, MN

This case study explores Rapid-Exit, programs that offer rapid re-housing and supportive services to families who reside in homeless shelters of Hennepin County, MN. In general, these homeless shelters experienced 1) a reduction in the number of families who utilize homeless shelters, and 2) a reduction in the lengths of stay at homeless shelters. Approximately 500 families are served by Rapid-Exit every year.

PROGRAM DESCRIPTION

Hennepin County provides Rapid Exit services to homeless families in County-contracted shelters. A central intake conducts an assessment of each family's barriers to getting and keeping housing, and triages the family to a Rapid Exit agency. Advocates help the family find housing through their networks of landlords, then offer six months of stabilization and support to both the family and the landlord. The program assists around 500 families per year.

CHALLENGE

The safety net was collapsing. Since the 1980s, Hennepin County had voluntarily provided shelter to all homeless families with minor children who had no other options. But by 1992, after three consecutive years of 35% increases in shelter census, every shelter bed and every budget motel room were filled. It was clear that the policy would soon be meaningless-perhaps even rescinded. None of the traditional approaches to homelessness could impact increasing shelter admissions and length of stay in time to prevent shelter turnaways.

SOLUTION

Non-profit service providers and County staff began meeting weekly to envision new approaches. The group focused on two strategies—reducing admissions to shelter and rapidly exiting homeless families into housing. Everyone agreed on the goal, but had no known models to achieve it. The planning group decided to consult the "experts," holding focus groups with over a hundred homeless families. "What caused you to become homeless?" "What's keeping you homeless?" Using their responses, the group decided to focus on the intended outcome, experiment with a variety of methods, and learn from the results. Meanwhile, they successfully lobbied for flexible new state funding for family homelessness grants that would, for the first time, specify only the intended results--leaving decisions about service design to local communities.

IMPLEMENTATION

With the new, flexible, state funding, Hennepin released a competitive Request for Proposals, seeking non-profits to rapidly move families out of homeless shelters. The primary target was the 80% of homeless families who had moderate to moderately serious housing barriers. Non-profits would move families into private market housing and provide stabilization support for six months to achieve non-recidivism performance targets. The contracts were outcome-based, with few service specifications so there would be no contractual obstacles to innovation.

As the project evolved, independent outreach to homeless families was replaced by a central intake, assessment and triaging. More community agencies began accepting referrals from the central "Rapid Exit" Screener, increasing housing options. A Landlord Advisory committee offered insight into landlord needs and concerns. Rapid Exit advocates became skilled "credible intermediaries," devising creative and effective techniques to minimize the risk to landlords of renting to families with poor Tenant Screening Reports.

Monthly meetings between County and non-profit staff for training, problem-solving and data-sharing have continued for over sixteen years. As a result of the ongoing exchange of ideas, Hennepin County has made major internal changes: flexible County funding that can quickly pay many re-housing costs, and a specialized County-operated Shelter Team to coordinate Rapid Exit Housing Plans with public benefits.

RESULTS

The <u>systems goal</u> was achieved. For the past 16 years Hennepin County has been able to maintain the "Shelter All" policy for families with no turnaways. Shelter admissions and length of stay were reduced substantially. In one four-year period, when internal County funding and staffing changes were implemented to support rapid re-housing, shelter admissions declined by 42%, average length of stay by 47% and the total number of purchased "bed-nights" was reduced by 70%. <u>Household goals</u> were also achieved. Since 1995, over 8000 families, with more than 20,000 children, have received Rapid Exit re-housing. One year after case closing, 92% had not returned to shelter.

INSIGHTS/LESSONS LEARNED

- Through service delivery and two detailed Housing Surveys that included several thousand respondents, it is clear that this is what people want: their own place, as quickly as possible.
- Once homeless people are housed, the majority feel safe enough to work on other life goals—particularly employment and children's schooling. The most effective approach is to make sure services are voluntary (housing is not contingent upon service utilization or progress on life goals) and the household can decide their own priorities, sequencing and timing.
- Culturally-competent staff are critical to program success. The majority of Rapid Exit staff mirror the racial/ethnic demographics and life experiences of homeless families. Staff have experienced homelessness, poverty, single parenthood, chemical dependency and/or incarceration. They can quickly engage with homeless families, offer practical advice, and act as role models, inspiring clients to succeed. "I did it and so can you."

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our place housing solutions

Internal Evaluation of the Homelessness Prevention & Rapid Rehousing Program Administered by Our Place Housing Solutions

January 2010 - August 2012

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Table of Contents

Executive Summary

The Program

The Homelessness Prevention and Rapid Rehousing Program (HPRP), created in 2009 as part of the American Recovery and Reinvestment Act, and administered through the department of Housing and Urban Development (HUD), granted 1.5 billion in funds to states and local communities for the creation of a three year program that would provide temporary financial assistance to households experiencing housing crises and facing homelessness. The program was comprised of two interrelated components: Homelessness Prevention helped those in danger of becoming homeless, while Rapid Rehousing assisted those recently homeless and in immediate need of permanent stable housing.

In East Los Angeles County, Our Place Housing Solutions (OPHS), in partnership with People Assisting the Homeless (PATH) and other agencies, took on responsibility for administering the HPRP program for the cities of Bellflower, Lakewood and Paramount. Enrollment began in January of 2010, and from that time until the program's termination in August of 2012, 360 clients and their households were enrolled in the HPRP. Including all household members, 1,056 adults and children were assisted in dealing with their housing crisis in the 30 months that the program was operational.

Evaluation

This evaluation was initiated by OPHS in the final six months of the HPRP grant in order to assess the outcomes of the program. The purpose of this evaluation is to develop a better understanding of the results of the program, how effective OPHS was at administering its HPRP, and its impact on the lives and housing situations of those that participated in the program. This evaluation seeks to answer four broad questions regarding OPHS' implementation of the HPRP program:

- ***How effective was the program in achieving its goal of assisting clients and their households in resolving their housing crises?***
- ***What demographic and programmatic factors influenced the program's rates of success?***
- ***How did this program's structure and policies, both internally and externally applied, affect its outcomes?***
- ***How effective did participating clients feel that the program was in achieving the goal of resolving their housing crises?***

To address these questions, an outside evaluator was employed to conduct this evaluation. Using an explanatory mixed-methods strategy to examine qualitative and quantitative data from a number of different sources including client records, case notes, and interviews, client outcomes are measured against program inputs to examine the program's efficiency and efficacy in achieving its goals; an examination of clients' and case managers' experiences with the program provide a better understanding of the factors contributing to observed outcomes.

Conclusions

Of the 308 clients who had received assistance and subsequently exited the program prior to this evaluation, 256 (83%) were recorded as "stably housed" at the time that they left the program and 201 (65%) had "completed the program, stably housed." Only 52 (17%) of the households who received assistance were not stably housed by the time they left the program.

Direct financial assistance and case management resources had a decisive impact on the outcome of housing crises.

The greatest part (84%) of direct assistance funds went to assist clients and their households who were ultimately successful in resolving their housing situation. The 308 clients and households included in this evaluation received almost $1.4 million in direct financial assistance; of this, clients exiting stably housed received just over $1.17 million in assistance, while a little over $225,000 was used to assist clients whose housing crisis had not been resolved at the time their case was closed.

Due in part to the nature and formation of the HPRP grant, this program had no preset program objectives for which outcomes could be compared or success could be defined, however summative statistics do indicate success in that that clients enrolling in this program had a high probability of resolving their housing crisis with the vast majority completing the program as well.

Several factors were shown to influence program outcomes. The program demonstrated a strong positive trend toward higher rates of housing stability and program completion throughout the programs progression, despite volatile enrollment rates and a critical midpoint funding crisis. Program outcomes varied significantly between the three cities, however limitations in the way outcomes were recorded prevent strong conclusions from being drawn. The most significant demographic factor influencing success rates was a household's income at exit.

Rapid rehousing clients used 58% less direct financial assistance than prevention clients.

Although only 21% of clients were already literally homeless and therefore enrolled in the Rapid Rehousing component of the program (in contrast to the 79% enrolled in the Homelessness Prevention component) there were no statistically significant differences between these for either client household demographics or program outcomes of housing stability or program completion. Significantly, Rapid Rehousing clients used 58% less direct financial assistance than prevention clients, however caseworkers stated that rapid rehousing clients required more case management resources to find and secure stable housing. The findings of this evaluation suggest that future programs with limited funding may be able to help more clients by focusing more on rapid rehousing than prevention.

The most significant demographic factor influencing success rates was a household's income at exit.

Qualitative data, including interviews with former clients, confirmed that recorded outcomes generally reflected clients' actual housing situations at the time that they left the program. Clients generally expressed satisfaction with the program overall and gratitude for the assistance. Most clients testified that the assistance of the program, both direct financial assistance and case management resources had a decisive impact on the outcome of their housing crisis, however a small minority of clients did not believe they would have actually become homeless if not for the assistance, as required by federal HUD guidelines for the program. Evidence compiled from client interviews and case notes suggest that future homelessness prevention programs using the HPRP model would benefit both from a more holistic understanding of the causes of the housing crises that they are addressing, and a broader response to the barriers that families face in resolution to their housing crisis.

Program Overview

The Homelessness Prevention and Rapid Rehousing Program (HPRP) was created as part of the American Recovery and Reinvestment Act passed by congress in early 2009. The program, administered through the department of Housing and Urban Development (HUD), granted 1.5 billion in funds to states and local communities for the creation of a three year program that would provide temporary financial assistance to individuals and families who were experiencing housing crises and facing homelessness.

The purpose of the HPRP was to alleviate the burden of homelessness in communities facing hardship due to the economic downturn of the late 2000s. HUD provided a number of basic eligibility and program requirements but, beyond these, gave state and local grantees the flexibility to tailor the program to target the needs of their communities. Grantees were encouraged to integrate the HPRP within existing housing and homelessness service systems, and were given considerable leeway to implement the program as they saw most befit their community's needs.

Homelessness Prevention

Assisted households in imminent danger of becoming homeless, to return to housing stability

Rapid Rehousing

Assisted individuals and families who were already homeless to regain stable housing

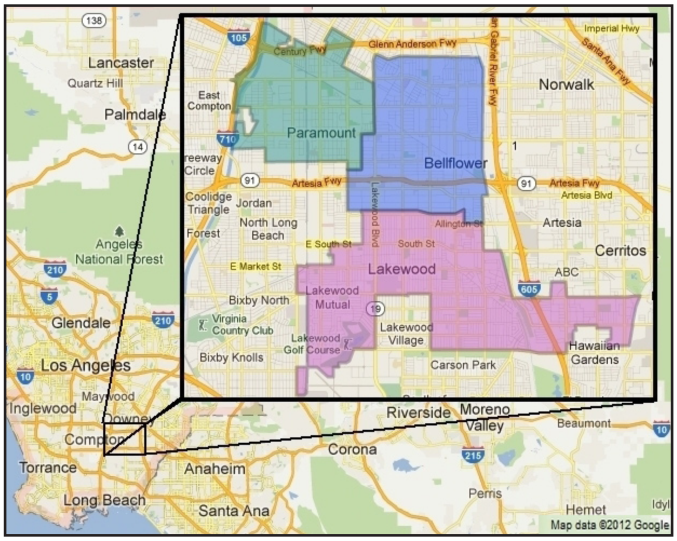
The HPRP provided funds for two separate but related components. The homelessness prevention component targeted funds to households who were currently renting their housing but facing an imminent threat of homelessness due to a pending eviction, or impending loss of suitable housing. These clients received financial and other assistance in either resolving their rental conflict or relocating to more suitable housing. The rapid rehousing component, by contrast, targeted individuals and families who had already become homeless (as defined by the McKinney-Vinto act of 1987). These families received assistance in rapidly relocating to stable rented housing. For both of these, the goal of the HPRP was to reduce homelessness in targeted areas by providing short term assistance in order to prevent families from becoming or remaining homeless in their community.

HPRP Grant and Sub-grant

In California, HUD and the California Department of Housing and Community Development (HCD) allocated $189 million in HPRP funds to cities and counties throughout the state for the local administration of the program. People Assisting the Homeless (PATH) teamed up with various grant partners in East Los Angeles County, including Our Place Housing Solutions (OPHS), to administer the program for the cities of Bellflower, Lakewood and Paramount. Upon approval of the sub-grant from the HCD in August of 2009, OPHS took on responsibility for administering the grant, including client screening and enrollment, case management, disbursement of financial assistance, and coordination of client services for these three cities.

In November of 2009 OPHS began hiring and training staff and case managers and in January of 2010, the first clients were enrolled in the program. Between January of 2010 and June of 2012, OPHS enrolled 360 clients and their households in the HPRP. Including all household members, 1,056 adults and children were assisted in dealing with their housing crisis in the 30 months that the program was operational.

Summative Evaluation



This evaluation was initiated by OPHS in the final six months of the HPRP grant in order to assess the outcomes of the program over the course of its administration of the HPRP. The purpose of this evaluation is to develop a better understanding of the results of the program, how effective OPHS was at administering its HPRP, and its impact on the lives and housing situations of those that participated in the program. It represents an opportunity to provide lessons for the administration of future programs, and to contribute to the broader understanding of the HPRP and its approach to combating homelessness through prevention and rapid rehousing.

With these goals in mind, this evaluation seeks to answer four broad questions regarding OPHS' implementation of the HPRP program:

- ***How effective was the program in achieving its goal of assisting clients and their households in resolving their housing crises?***
- ***What demographic and programmatic factors influenced the program's rates of success?***
- ***How did this program's structure and policies, both internally and externally applied, affect its outcomes?***
- ***How effective did participating clients feel that the program was in achieving the goal of resolving their housing crises?***

In order to address these questions, an outside evaluator was employed to design the evaluation, gather and analyze the data, and report the findings. This evaluation uses an explanatory mixed-methods strategy to examine qualitative and quantitative data from a number of different sources including client records, case notes, and interviews. Client outcomes are measured against program inputs to examine the program's efficiency and efficacy in achieving its goals; an examination of clients' and case managers' experiences with the program provide a better understanding of the factors contributing to observed outcomes.

It is hoped that this evaluation will provide a clear description and analysis the HPRP as it was administered in the cities of Bellflower, Lakewood, and Paramount by OPHS and its partners in Eastern Los Angeles County.

The Context: Homelessness, Prevention, and Rehousing

Historically, strategies to address the persistent problem of homelessness in our nation have focused on building a network of shelters and transitional housing with an array of social services designed to provide for the immediate needs of the homeless and move them gradually into stable housing and reintegration. Recently, reliance on this "Continuum of Care" model has come under increasing scrutiny for being unable to address the immediate causes of homelessness. The current focus on "housing first", and prevention based models represent a significant shift in local and national strategies to deal with the problem. Rather than simply reacting to the needs and problems of the homeless, a focus on prevention more directly addresses the housing crises that precipitate homelessness. (Culhane et al., 2011) Evidence based research has shown that prioritizing stable housing for those who are currently homeless or at risk of homelessness can reduce costs to the public and increase effectiveness of services such as healthcare and substance abuse treatment. (Flaming et al. 2009)

The HPRP created by the American Recovery and Reinvestment Act of 2009 was the first nationwide implementation of the housing first and prevention strategies of homelessness reduction. At the time of this report, the only evaluation of the program on a nationwide level is the department of Housing and Urban Development's Year 1 Summary of the HPRP. This report estimated that of those that were homeless upon entering the program 64.2% were stably housed at exit; those that were unstably housed or eminently losing their housing at entry exited stably housed at a rate of 52.2%.

Homelessness in Los Angeles County

Los Angeles is known to have the largest concentration of homeless residents in the country. At the time the HPRP was created, The 2009 Greater Los Angeles Homeless Count conducted by the Los Angeles Homeless Service Authority (LAHSA) reported 52,931 homeless individuals in Los Angeles County. The enormity of the problem of homelessness in LA is reflected in public expenditures as well. As the continuum of care for greater Los Angeles, LAHSA reported in that same year that it and its partners managed over $70 million in public funds to address the problem of homelessness in the area.

The HPRP grant represented a chance for LAHSA and other homelessness service providers to approach the problem of homelessness from a new direction. Funding was disbursed according to the Emergency Shelter Grants formula for calculating local need, accordingly HUD granted almost $42 million in HPRP funds to the City of Los Angeles and Los Angeles county for the program, (compared to the $44 million granted directly to the State of California through the HCD). Over the three years of the grant, almost a hundred Homelessness Prevention and/or Rapid Rehousing programs operated in Los Angeles County. By the fall of 2011, most of these programs had spent their grant funds and were closed to new enrollments. Only 11 programs (including the three cities administered by OPHS) were still open and accepting new applicants.

The 2011 Greater Los Angeles Homeless Count conducted by LAHSA reported 51,340 homeless individuals in Los Angeles County. This figure is down 3% from the figures reported in 2009. Although no research has been published to offer an explanation for the decrease, given the enduring impact of recent economic hardship on the region, it is tantalizing to imagine that HPRP grant programs had some impact in reversing a trend in rising homelessness in the area.

HUD HPRP Guidelines

Federal grants for the HPRP program were administered through the department of Housing and Urban Development. Although grantees had considerable discretion in implementing the program, a number of basic eligibility criteria were imposed by HUD in order to insure that funds were used to assist those most at risk of homelessness. Households applying for HPRP assistance were required to meet with a case manager at least once prior to enrollment to establish eligibility according to these criteria. The combined total income of the household could not exceed 50% of the area's median income (AMI), and the household must have demonstrated that they are either homeless (to receive rapid rehousing funds) or at imminent risk of homelessness (to receive prevention funds). Finally, the household must have demonstrated that they had no subsequent housing options and would have become or remained homeless without the assistance of the program.

Our Place Housing Solutions HPRP

From January of 2010 to June of 2012, 360 clients and their households were enrolled in the HPRP program administered by OPHS for the cities of Bellflower, Lakewood and Paramount. From the total $3.6 million HPRP grants for these three cities, (of which $2.9 had been received and spent down as of June 2012), $1.6 million in direct financial assistance had been spent in efforts to resolve these clients' housing crises. Approximately $1,380,000 was spent on efforts to prevent 285 households from becoming homeless, while approximately $224,000 was spent to assist 75 clients and their families in being rehoused from situations of homelessness. Forms of direct assistance included rental arrears and rental subsidies, utility arrears and subsidies, and utility and security deposits for rehousing clients.

Basic Eligibility Criteria

Total household income must not exceed 50% of the Area Median Income (AMI)

The household must be literally homeless (to recieve rapid rehousing assistance) or at imminent risk of homelessness (to receieve homelessness prevention assistance)

The household must demonstrate that it would become or remain homeless without the assistance of the program

The HPRP program as administered by OPHS specifically targeted individuals and families whose housing crises were critical but resolvable, and who had a high probability of quickly returning to financial self-sustainability after receiving the program's assistance. Through this program, eligible families could receive short term assistance with rent, including rental arrears, and/or rehousing costs such as security deposits and utility bills. The program went through a number of early eligibility and assistance policy adjustments, however by the end of the first year, a limit of six months' rental assistance and arrears had been set, which could be waved upon extenuating circumstances.

Households were required to demonstrate they had either the current means to meet their financial obligations, or the potential to be able to do so in the very near future. The temporary assistance of the program was intended to be sufficient to resolve the client's housing crisis and return them to self-sustainability. As part of the prescreen and initial assessment before enrollment, household income was calculated and compared against expenses in order to estimate the likelihood that the household would remain financially stable once their housing crisis was resolved. Applicants were denied assistance if their current or expected household income was not sufficient to meet their financial obligations.

Households Enrolled	Financial Assistance
360 Total Enrollment	$1,603,041 Total Assistance
285 Homelessness Prevention	$1,379,490 Prevention
75 Rapid Rehousing	$223,550 Rapid Rehousing

During their participation in the program and as a requirement for receiving financial assistance, clients met monthly with their case manager to complete a budget for the coming month, review goals from the previous

Homelessness Prevention

Approximately 80-100 calls recieved per month from people requesting housing assistance

More than 530 applicants denied assistance after screening

360 Clients enrolled and recieved assistance

month, and discuss the households progress in achieving financial and housing stability. Clients who failed to attend regular case management, or were unable or unwilling to adhere to a budget, were often denied further financial assistance.

A review of monthly call logs suggested a rough estimate of approximately 80 - 100 calls to the organization per month by people seeking assistance with their housing crises. Callers were placed on a waiting list and their calls were returned as funding to enroll new clients became available. A short pre-screening interview was conducted over the phone and, if the caller appeared eligible for the program, an appointment was scheduled for an initial assessment of the household's housing and financial situation. Of those that received a return call, at least 530 were denied assistance (compared to the 360 clients and their families who were enrolled in the program and did receive assistance). Beyond the HUD and HCD mandated guidelines, reasons for denial were most often related to the assessment of the household's ability to sustain itself financially after assistance.

Monthly program enrollment rates varied considerably throughout the span of the program. Although the program averaged 12 new enrollments per month, six different months saw new enrollments drop below six per month, and four months had over 20 new enrollments. Fluctuations in enrollment reflected issues and uncertainties with funding that plagued this organization's program. Unlike other HPRP programs in LA county which received their funding from LAHSA, OPHS along with PATH operated their program through a sub-grant from California's HCD. State funding of the HPRP switched to a reimbursement system in August of 2011, requiring the organization to mobilize cash reserves that it did not have access to at that time. This created a crisis of funding which almost caused the termination of the program, and even after external finances were located, was a source of continued hardship for this and likely other organizations operating HCD sub-grants for HPRP.

Evaluation Methodology

Research, data collection, and analysis for this evaluation were conducted in the final six months of the program's grant. A summative evaluation at the end of the program presents the unique opportunity to examine the evolution of the program and observe trends in the programs outcomes over time. With a sample size approaching the total number of clients enrolled in the program, outcomes more are easily generalizable to the program overall.

Scope of this Evaluation

Between January of 2010 when OPHS began enrolling clients, and June of 2012, when the final data for this evaluation was collected, 308 clients and their households had received assistance and subsequently exited from the program. Not included in this evaluation of outcomes are the 52 clients who were still enrolled and receiving assistance as of June 2012, the six clients who had been enrolled and then exited without receiving financial assistance, or the uncounted but likely modest number of potential clients who were approved for services but, for various reasons, were never enrolled or received financial assistance.

Measurement of Outcomes

Outcomes recorded for each client at the time of their exit included a reason for leaving and an assessment of the household's housing stability at the time their case was closed. Clients who attended monthly case management sessions and achieved their goals of financial and housing stability set during case management were considered to have completed the program. Other reasons recorded for leaving the program include non-compliance with the program, inability of the program to meet the client's needs, and clients no longer qualifying for the program at reevaluation (such as when the household's total income increased to greater than 50% AMI). Clients experiences with the program varied widely from case to case, and the reasons record given for leaving the program attempted to reflect these. For this evaluation, the reasons for leaving the program have been collapsed into "completed the program" and "did not complete the program" in order to measure successful program participation.

Housing stability was recorded by the case manager at the time their case was closed and was based on an assessment of the household's ability to meet their housing needs for the foreseeable future. Housing status for the household was recorded as either "Stably housed" "Unstably housed" or "Imminently losing their housing" at exit. A household's permanent income versus their expenses, and clients' estimations of their ability to meet their rental obligations for the coming months were the two main factors used to assess housing stability. For most of the length of the program, clients were kept on a three month retention period after their last financial assistance in order to monitor their housing stability before their case was closed (the retention period was reduced to one month at the end of 2011). For those cases in which the case manager was unable to get in touch with the client at the end of the retention period, the property owner or manager was contacted to determine the client's current housing status and estimate stability.

For the purpose of this evaluation and especially for the statistical analysis of outcomes, the recorded "reason for leaving the program" and the "housing status at exit" were combined into one outcome measurement with three possible outcomes: "Completed program, stably housed", "Stably housed but did not complete the program," and "Not stably housed at exit." Clients with outcomes in the first category represent successful cases in which clients attended monthly case management and worked toward the goals set down therein, received financial assistance as well as access to other resources, and ultimately saw their housing crisis resolved by the time they exited the program.

Clients with outcomes of "Not stably housed at exit" include those who received assistance but were unsuccessful in resolving their housing crisis within the timeframe of the program, and were recorded as either being unstably housed or imminently losing their housing at exit. Also included were those clients who "disappeared" and whose housing status was not ascertainable at the time their case was closed.

The remaining category, "Stably housed but did not complete the program", represents equivocal successes. Many of these clients received financial assistance in either preventing an eviction or relocating to a more stable housing situation, but did not elect to attend further case management or maintain contact with the program or their case manager. Other cases that fall into this category include some clients who were no longer eligible for assistance at the time of the required three month re-evaluation, or who elected to pursue housing options that disqualified them from receiving further assistance.

Reopened Cases

A small minority of clients returned after having their case closed, to request additional assistance with a new or reoccurring housing crisis. These were evaluated on a case by case basis, taking into account their previous participation in the program as well as their current circumstances. Returning clients who were approved for further assistance had their cases reopened. Due to the design of the HMIS software used to record client's progress in the program, there is no reliable way discern which clients were re-enrolled. For the purposes of this evaluation, these cases are treated as a single period of enrollment and only their final outcomes are counted.

Quantitative Data

HMIS Data

Demographic and programmatic data for every client was entered into the Homeless Management Information System (HMIS) as mandated by HUD. Data included comprehensive background information for each client and their household, program inputs such as instances and amounts of financial assistance and case management, and outcomes including goals and housing stability. This data was downloaded, compiled and verified. Quantitative analysis was conducted to uncover any statistically significant trends or correlations between program factors and outcomes.

> **Data Sources Used in Evaluation**
>
> HMIS client database reports
>
> Client case files and case notes
>
> Telephone interviews with former clients
>
> Focus groups with case managers

All clients enrolled in the program were registered in the Homeless Management Information System (HMIS) as required by HUD. Demographic and background information was recorded in the database for each client and their household at the time of their enrollment. such as financial assistance and case management were recorded and updated during the course of their enrollment in the program and final program outcomes such as housing stability were entered at the time their case was closed.

Relevant data was downloaded and aggregated from this database for all clients enrolled in the program between January of 2010 and June of 2012. A sample of the total cases was compared to the case manager's files in order to verify the accuracy of the data. Due in large part to shortcomings of the software, figures for client incomes reported in HMIS were found to be unreliable. Client incomes at enrollment and exit, as well as the total number of case management sessions had to be tallied from the case files in order to obtain reliable figures. Analysis of the quantitative data collected from the HMIS and case files relied on parametric and non-parametric statistical techniques to uncover significant correlations, trends, and differences among programmatic factors and recorded outcomes as described above.

Qualitative Data

Client Interviews

In order to better understand the clients' experience with the program, a randomized sampling of 67 cases were selected; their files and case notes were reviewed, and multiple attempts were made to contact the client for an interview. Of the 67 clients who were called, 27 clients were contacted, and 26 consented to be interviewed. The interview included twelve open ended questions regarding clients' current housing and financial situations, experiences with the program, and any feedback on what they believed could have been improved. Respondents' answers were recorded manually and later coded for themes and patterns.

Case Notes

Case notes for 91 clients were reviewed and analyzed. These included the 67 clients who were randomly selected for telephone interviews, as well as 24 additional clients whose housing stability and reason for leaving the program did not follow typical patterns of client outcomes and so represented a "deviant cases" sampling. Case notes for both the random and deviant case samples were reviewed using methods of content analysis; relevant details for each case were recorded, coded and examined for themes.

Case Manager's Focus Group

A two-hour focus group session was held with all available case managers for the HPRP program administered by OPHS. Questions asked of the case managers centered on their interpretation and implementation of the program policies, as well as their perceptions of factors that influenced client outcomes. Participation was voluntary and participants were assured of confidentiality. The focus group session was recorded digitally with the anonymous consent of all participants. Responses informed the qualitative findings and are elaborated below.

Limitations

A number of factors limit this evaluation and the conclusions that can be drawn from it. As a summative evaluation undertaken at the end of the program, the quantitative data available is limited to clients who were actually enrolled in the program; without similar data on comparable households not enrolled in the program, a causal link cannot be formally drawn between program participation and client outcomes. Without assuming that every client truly would have become or remained homeless without assistance (as is the HUD mandated requirement for enrollment), there is no statistically acceptable way to estimate the impact of the program on client's housing as a result of their participation.

Limitations on the measurement of outcomes result more specifically from a lack of program guidelines on what constitutes stable vs. unstably housed and how the "reason for leaving the program" is determined. Without written policies defining these, program outcomes are subject to biases inherent in subjective judgment. Consequently there is no way to objectively gauge the consistency with which outcomes were determined from case to case and especially between case managers. Future evaluations of this type would greatly benefit greatly from clearly defined outcome measurements built into the program design.

Finally, client interviews are subject to several potential selection biases. Although the random sample was chosen from the total of all clients whose cases were closed at the time the interviews were conducted, former clients who had participated in the program more recently were more likely to be to be able to be contacted than those who had participated earlier on. For obvious reasons, clients whose housing crises were resolved by the end of their participation in the program were also much more likely to be reached by telephone than those who had not.

Results

How effective was the program in achieving its goal of assisting clients and their households in resolving their housing crises?

Due in part to the nature of the HPRP grant and its rapid formation in 2009, this program had no preset program objectives for which outcomes could be compared or success could be defined. Summative statistics do indicate that clients enrolling in this program had a high probability of resolving their housing crisis with the vast majority completing the program as well.

Summation of Program Outcomes

Of the 308 clients who had received assistance and subsequently exited the program prior to this evaluation, 256 (83%) were recorded as stably housed at the time that they left the program and 201 (65%) had completed the program, stably housed. Only 52 (17%) of the households who received assistance were not stably housed by the time they left the program.

Summative Program Statistics

83% of clients exited stably housed

65% of clients completed the program stably housed

84% of financial assistance went to clients who became stably housed

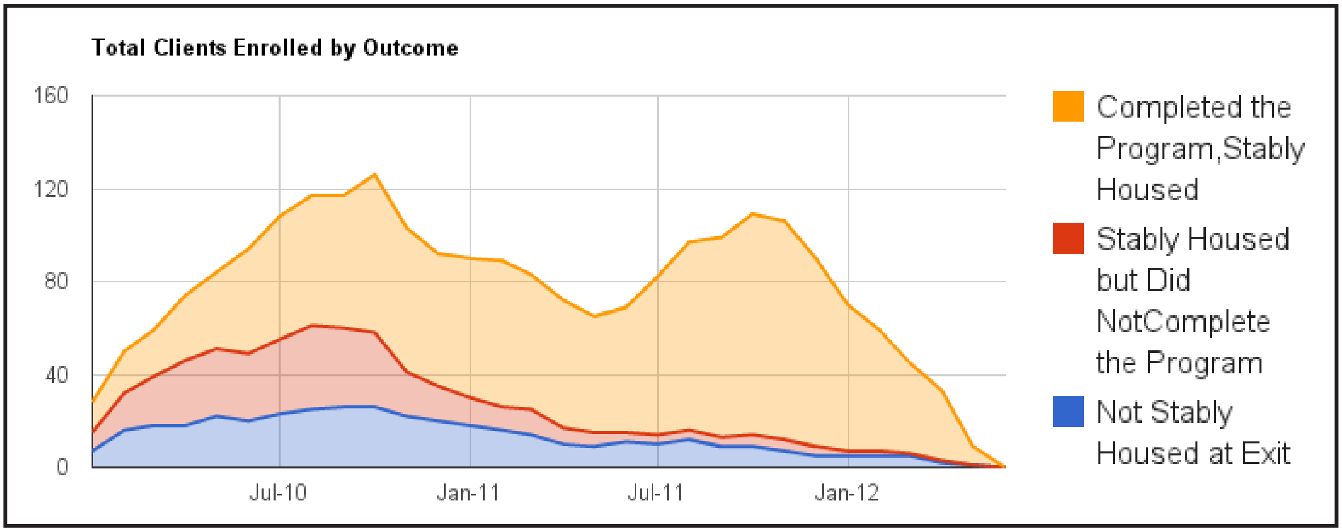
The greatest part (84%) of direct assistance funds went to assist clients and their households who successfully resolved their housing situation. The 308 clients and households included in this evaluation received almost $1.4 million in direct financial assistance; of this, clients exiting stably housed received just over $1.17 million in assistance, while a little over $225,000 was used to assist clients whose housing crisis had not been resolved at the time their case was closed.

Program Outcomes and Enrollment Over Time

Program outcomes improved significantly over the length of the program operation. In the first year of operation, 78% of clients exited stably housed but only 47% of these completed the program, whereas the second year saw 91% stably housed with 85% also completing the program. Outcomes did fluctuate from month to month but with an obvious trend toward higher rates of housing stability and program completion as the program progressed.

When examined in conjunction with enrollment rates, outcomes appear to have been tied to program enrollment in a particular pattern over the course of the program. Client outcomes rose and fell proportionally with the total number of clients enrolled for the first 16 months of the program. During that time, funding uncertainties having to do with a change from a disbursement to a reimbursement system caused a rapid drop in total clients enrolled in the program. The resolution of the grant funding crisis for the program resulted in a resurgence of enrollment in the last half of 2011. During this time the total number of clients who exited the program unstably housed and those who did not complete the program continued to fall, while the proportional number of clients who completed the program, stably housed rose at roughly the same rate as new enrollment. The result, as diagramed below, demonstrates that the program outcome rates were significantly better in the second half of the program's grant period than before. (Differences between total clients enrolled and clients exiting with outcomes show those clients who were still enrolled in the program at the time data for this evaluation was collected.)

What demographic and programmatic factors influenced the program's rates of success?

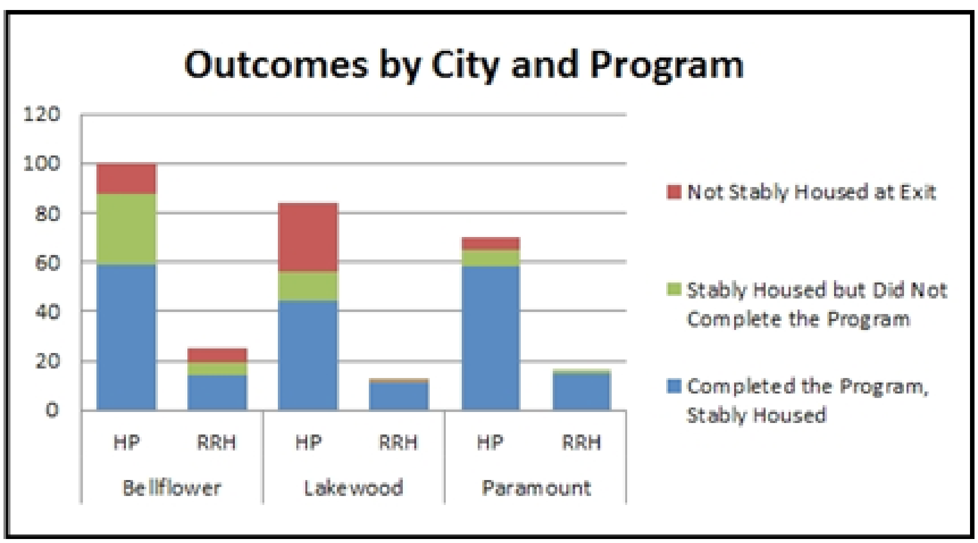


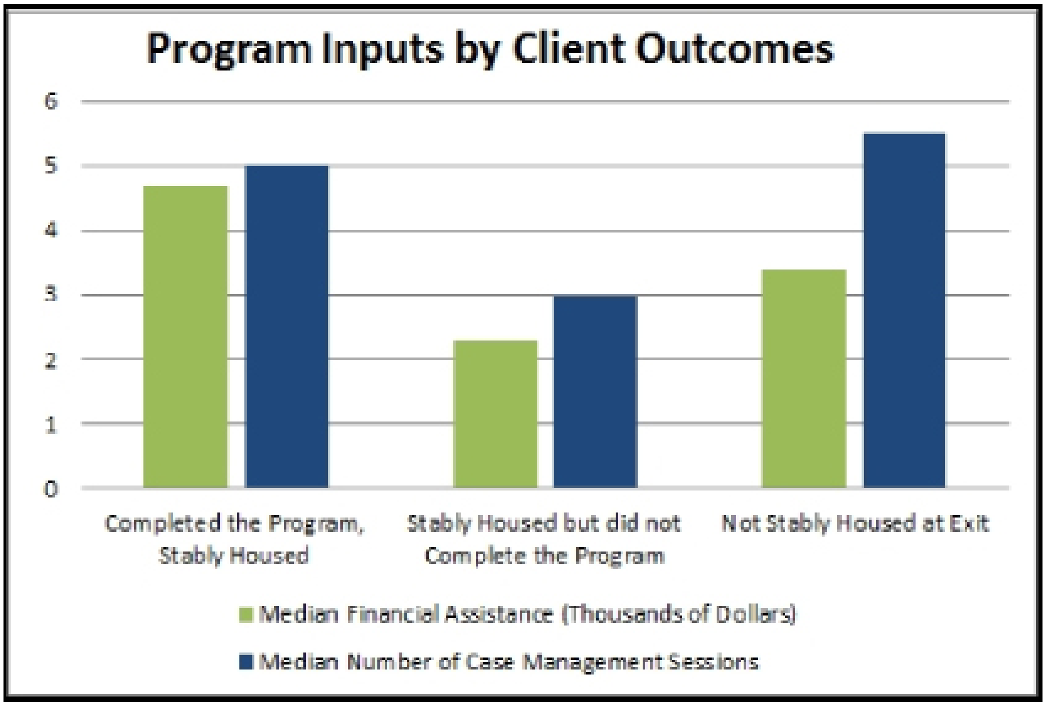
Outcomes by City

Program outcomes varied significantly between the three cities for which OPHS administered the HPRP. Clients enrolled in the Paramount HPRP were more likely to complete the program, and more likely to exit the program stably housed, while clients enrolled in the Lakewood and Bellflower HPRP were less likely to do so. It is difficult however to draw many conclusions from these differences because limitations associated with subjective interpretations of what constitutes housing stability and program completion factor most strongly when comparing outcomes between case managers who were assigned to specific cities.

Program Inputs: Financial Assistance and Case Management

Client outcomes were shown to be tied to the program inputs, however these connections were complex and seemingly counterintuitive. Housing stability at exit was not, by itself, significantly affected by the amount of financial assistance a client received or the number of times that they met with their case manager. When program completion is taken into account however, clients who exited the program stably housed but without completing the program received significantly less financial assistance and met with their case manager significantly fewer times than clients who either completed the program, stably housed, or did not exit stably housed.





Household Demographics and Program Outcomes

Contrary to expectations, no statistically significant connections could be found between a client's household size and/or makeup and their program outcome. There were no significant differences in program outcomes for single parents, two parent families, households with no children, or single individuals. Even the ratio of minors to adults in a household had no statistically significant effect on their outcome at exit.

Additionally, total household income at enrollment, both in terms of absolute value and adjusted for family size (as a percentage of AMI), was not connected to a household's outcome. The only household demographic that was shown to directly relate to program outcomes was the household's total income at exit. Clients with higher household incomes at exit, and clients whose household income was higher upon exiting the program than upon entering, were more likely to complete the program and to exit stably housed. The lack of correlation between a household's income at entry and their outcome suggests that this was not the indicator of sustainability that it was thought to be.

How did this program's structure and policies, both internally and externally applied, affect its outcomes?

Prevention versus Rapid Rehousing

Outcomes were proportionally similar for prevention versus rapid rehousing participants. Fully 82% of prevention clients were stably housed at exit, and 63% had also completed the program. By comparison, 87% of rapid rehousing clients were stably housed, while 74% also completed the program. Due to the disproportionately small number of clients receiving RRH assistance, these differences are not great enough to be able to conclude any statistical significance.

No significant demographic differences were found between prevention clients versus rapid rehousing clients. Length of enrollment and number of case management sessions were comparable between the two types of assistance as well.

On the other hand, differences in the amount of assistance rapid rehousing clients received when compared with clients enrolled in homelessness prevention were significant. Rapid rehousing clients received a median total assistance ($2,344) that was approximately 58% of the median assistance that rapid rehousing clients received ($4,064).

Case managers stated that rapid rehousing clients required much more effort to assist than prevention clients because of the need to assist with the search for appropriate housing, negotiations with the prospective landlord, and the process of moving-in.

Total Median Financial Assistance per Household	
Prevention	Rapid Rehousing
$4,064	$2,344

How effective did participating clients feel that the program was in achieving the goal of resolving their housing crises?

Confirmation of Outcomes

Case notes reveal that program outcomes reported in HMIS generally matched clients' level of participation in the program and their housing situation at exit as best as could be determined by the case manager at that time. Housing stability was most often determined through direct communication with the client at the time their case was closed, and secondarily through communication with the client's landlord or property manager (if the client could not be contacted.)

The majority of clients who participated in the phone interview had been recorded as stably housed and completing the program. Clients generally described their housing situation at the time they exited the program in line with the program outcomes that had been recorded for them. Although several former clients described subsequent instances of housing crises occurring after exiting the program these almost always appeared well after they had ceased contact with their case manager. On the other hand, two interviewees who had been recorded as being unstably housed at exit were still residing in the same place that they had at the time of their participation in the program, though they were still unable to meet their monthly financial obligations.

Of the former clients who were interviewed, those who had exited stably housed overwhelmingly attributed the resolution of their housing crisis in large part to the financial assistance and other resources they received by the program. Most of these stated that they felt they would not have been able to regain or retain stable housing without the assistance that they received from the program. A minority of those interviewed denied that they would in fact have become homeless without the assistance of the program, however when asked what alternative options would have been available many answers would not have been seen as viable alternatives to assistance. Nevertheless, it seems likely that some clients downplayed alternative options to resolving their housing crisis in order to qualify for program assistance.

Client Experience with Case Management

Interviewed former clients overwhelmingly expressed a generally positive experience with the HPRP program, and especially in interactions with their case managers. With few exceptions, clients described their case workers as being compassionate and professional; clients frequently remarked that they were treated with dignity and respect in the course of their case management sessions. Many respondents attributed the successful resolution of their housing crisis to the skilled guidance of their case manager as much as to the financial assistance they received. Help with legal resources, mediation with landlords and property managers, financial counseling and employment skills development were some of the non-financial resources clients cited as valuable to the resolution of their housing crisis and return to financial stability.

Clients' use of non-financial program resources was far from uniform however. Many clients saw case management as simply a program requirement to receive financial assistance, while others found it to be a resource essential to their success. Interviews also revealed that some clients felt that the program focused too heavily on financial aspects of their case without adequately addressing personal, domestic, and health issues that were often barriers to stability or even the original cause of their housing crisis. Access to professional guidance and support, as well as assistance with referrals to a broader range of services were cited by some respondents as ways in which the program could have better addressed their case. Although the HPRP program was designed to provide and require a specific level of client participation and, it appears that some clients would have benefitted from more intensive case management, while others would have preferred more flexibility in this area.

Conclusions

The HPRP program was based on a model that attributes many cases of homelessness to instances of a preventable housing crisis precipitated by temporary issues of financial instability. By addressing short term financial needs, the HPRP was designed to bridge the gap in a household's financial stability in order to prevent or end a situation of homelessness.

This program as it was administered by Our Place Housing Solutions has demonstrated that temporary financial assistance can be effective in assisting households in resolving their housing crisis and returning to stability. Interviews of former clients indicate that most participants feel that the HPRP was instrumental in helping them resolve their housing crisis and avoid eviction and homelessness. Program outcome statistics demonstrate that roughly four out of every five households that participated in the program had resolved their housing crisis by the time that they left the program. Analysis of the outcomes in conjunction with client interviews and case notes can illuminate those aspects of the program that contributed to as well as those that hindered outcomes.

Homelessness Prevention and Rapid Rehousing

The two components of the program, homelessness prevention and rapid rehousing, enjoyed similar rates of success, however clients who enrolled in the prevention side of the program required substantially more financial assistance than those who were literally homeless and in need of rapid rehousing. On the other hand, rehousing clients were seen as a requiring greater case management resources to locate and secure stable housing for the household. The comparison of outcomes between these two components of the program is somewhat misleading, as prevention implies the abstract notion of the avoidance of a possible future event, while rehousing involves a concrete change in the client's living situation. This problem is highlighted by the responses of former clients in which a significant minority of those enrolled in prevention divulged that they did not believe they would have become homeless "if not for the assistance" as was required by HUD.

Although homelessness prevention may be more effective in avoiding the personal and social trauma of a household becoming homeless, the implications of this evaluation are that future programs modeled on the HPRP and operating with limited funding may be able to help more clients and achieve more concrete results fighting homelessness by prioritizing rapid rehousing over prevention strategies.

The HPRP Approach to Homelessness

This evaluation has demonstrated that the HPRP program administered by Our Place Housing Solutions enjoyed a fairly impressive success rate, given the limitations and funding uncertainties placed on it. There are indications, however, that the program's success rate was also limited by its focus on the financial causes of homelessness. Although nearly every client's housing crisis was precipitated to some extent by a crisis in financial resources that were insufficient to retain housing, case notes and interviews revealed that the origins of many clients' housing crisis were not purely financial. Likewise, many of the barriers to financial and housing stability that postponed or prevented clients' housing stability were not merely financial in nature. Legal issues, health crises, bureaucratic delays, and family conflicts are only some of the barriers that clients faced, both precipitating their housing crisis and arising during the course of their participation in the program.

The HPRP was designed to be able to integrate housing assistance with other existing social services, however it did not provide for the development of other non-financial support where none existed before. At the time that OPHS took on responsibility for the administration of the HPRP, it had not yet developed the capacity or resources to address many of the non-financial barriers to stability that clients faced. Although grant partners such as the Legal Aid Foundation provided some key non-financial resources to clients, others who were in danger of becoming homeless were not assisted or were unable to resolve their housing crisis with the resources provided.

The evidence from this three year program indicates that future homelessness prevention programs using the HPRP model would benefit both from a more holistic understanding of the causes of the housing crises that they are addressing, and a broader response to the barriers that families face in resolution to their housing crisis.

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