



STATE OF UTAH
STATE COMMUNITY SERVICES OFFICE
DEPARTMENT OF COMMUNITY AND CULTURE
DIVISION OF HOUSING AND COMMUNITY DEVELOPMENT

**HOMELESS PREVENTION AND RAPID RE-HOUSING
PROGRAM**

American Recovery and Reinvestment Act of 2009

**POLICIES AND PROCEDURES
MANUAL**

August, 2010

HPRP Policies and Procedures Manual

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SECTION 1: GENERAL INFORMATION

A. **PURPOSE OF POLICIES AND PROCEDURES MANUAL**

This document is designed to assist with implementing the Homeless Prevention and Rapid Re-Housing Program (HPRP). It contains required program and administrative policies and procedures and is to be used as a reference for all agencies responsible for the administration of HPRP initiatives and funds. It is the responsibility of all agencies to disseminate pertinent information and ensure that their staff and partner agencies are aware of, understand and comply with policies and procedures in this guide.

This handbook does not replace the provisions contained in the Department of Housing and Urban Development Docket No. FR-5307-N-01, Notice of Allocations, Application Procedures, and Requirements of Homeless Prevention and Rapid-Re-Housing Program Grantees under the American Recovery and Reinvestment Act of 2009 (the "Notice"), or any other applicable Federal, State and local laws, or ordinances and regulations pertaining to the HPRP. Its purpose is to highlight and emphasize grant requirements. Sub-grantees must always refer to the HPRP "Notice" regulations and the Federal Fiscal year 2009 HPRP Contract Agreement in determining what is allowable under HPRP, as well as the Department of Housing and Urban Development Homeless Resource Exchange for more in-depth and updated information.

- HUD Homeless Resource Exchange link: www.HUDHRE.info/
- "Notice" link: http://www.hudhre.info/documents/HPRP_NoticeRedline_6_08_09.pdf
- HUD HRE FAQs link: www.hudhre.info/HPRP/

The Homeless Prevention and Rapid Re-Housing Program is administered by the State Community Services Office (SCSO), State of Utah Department of Community and Culture, Division of Housing and Community Development.

All subgrantees are required to have in place an agency HPRP Policies and Procedures Manual that reflects the policies and procedures of both HUD and SCSO.

B. **HPRP PROGRAM DESCRIPTION**

The Homeless Prevention and Rapid Re-Housing Program (HPRP) was first enacted under the American Recovery and Reinvestment Act (ARRA) of 2009 (www.Recovery.gov), which included \$1.5 billion for the Homeless Prevention Fund. The program authorized the US Department of Housing and Urban Development (HUD) to make grants to states and units of local government to provide:

1. **Homeless Prevention Assistance:** For individuals and families who are currently in housing but *at imminent risk* of becoming homeless and who need temporary assistance to prevent them from *becoming* literally homeless, and
2. **Rapid Re-Housing Assistance:** For individuals and families who are now *literally homeless* (residing in emergency or transitional shelters or are living in a place not meant for human habitation) and need temporary assistance in order to obtain and maintain housing.

Both Homeless Prevention Assistance and Rapid Re-Housing Assistance may include:

1. **Financial Assistance:**
 - Rent
 - Security and utility deposits
 - Utility payments
 - Moving cost assistance
 - Motel/hotel vouchers; and

2. **Housing Relocation and Stabilization Services:**

- Case management
- Outreach and engagement
- Housing search and placement
- Legal services
- Credit repair

HPRP 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.

These resources are to be targeted and prioritized to serve households that are most in need of this temporary assistance and are most likely to achieve stable housing, whether subsidized or unsubsidized, outside of HPRP after the program concludes. Assistance should be focused on:

- housing stabilization,
- linking program participants to community resources and mainstream benefits, and
- helping program participants develop a plan for future housing stability that will continue after HPRP assistance ends

While the HPRP Notice requires resources to be targeted and prioritized to serve households that are “most in need of this temporary assistance and are most likely to achieve stable housing”, it is NOT a requirement for applicants to demonstrate that they have or will have income. SCSO encourages subgrantees to avoid using this as criteria to screen potential clients out of the program.

C. COORDINATION WITH RECOVERY ACT AND OTHER RESOURCES

Subgrantees are strongly encouraged, as part of local planning and coordination activities, to maximize all resources that may be available with Recovery Act funds other than HPRP. A program’s local plan for spending HPRP funds should coordinate closely with other Recovery Act funding streams, so that eligible activities under other Recovery Act programs are aligned with HPRP funds to create a comprehensive package of housing and service options available to eligible program participants.

D. HPRP SERVICE DESIGN AND DELIVERY TIPS

- Prevention and re-housing resources will be most effective when they are targeted directly to resolving a particular household’s specific barriers to getting or keeping housing.
- “Just enough” – households should receive the minimum amount of assistance necessary to resolve the immediate crisis and prevent its near-term recurrence.
- Linkage to mainstream resources is critical to some households’ ability to achieve housing stability and maximizes HPRP resources.
- Coordination with community-based and mainstream services makes existing services more accessible and effective while avoiding duplication. Establish strong relationships with:
 - Public assistance agencies
 - Local housing authority
 - Local landlords, landlord networks
 - VA service coordinators
 - Other veteran’s service organizations
 - Other homelessness prevention providers
- Train staff on other Continuum of Care/community resources and programs to ensure best “fit” for participant.
- Be clear about what HPRP can do and what it cannot do – with both staff and participants.
- Maximize HPRP: Design flexible program services that can vary in type, level and duration based on need.
- Incorporate eligibility recertification (required every 3 months) and other milestones in case plan.

- If unsure and/or if there are not other resources to refer applicants with greater needs: better to err on the side of ‘screening in’ than ‘screening out’. Ask yourself: “Is potential homelessness the better alternative?”
- Train staff on other community-based and mainstream resources to ensure needs are met post-HPRP.
- Use client assessment to identify system gaps.
- Conduct routine staff training and supervision.

SECTION 2: CLIENT ELIGIBILITY

A. REQUIREMENTS FOR ALL PROGRAM PARTICIPANTS WHETHER LITERALLY HOMELESS OR AT IMMINENT RISK OF HOMELESSNESS

1. **Assessment:** Agencies providing assistance must provide at least an initial consultation and eligibility assessment with a case manager or other authorized representative to determine HPRP eligibility and the type, level, and duration of assistance for each program participant. Eligibility assessments must be documented and kept in client file.

Agencies should have a process in place to refer persons ineligible for HPRP assistance to the appropriate resources or service provider that can assist them.

2. **Income Eligibility:**
Individual or household must be at or below 50 percent of the Area Median Income (AMI). AMI limits are available on HUD’s web site at: <http://www.huduser.org/DATASETS/il.html>.
3. **Housing Status:** The household must be either *at imminent risk of homelessness* (for prevention assistance) or *literally homeless* (for rapid re-housing assistance) **AND** meet the following circumstances:
 - No appropriate subsequent housing options have been identified;
 - The household lacks the financial resources to obtain immediate housing or remain in its existing housing; AND
 - The household lacks the support networks needed to obtain immediate housing or remain in its existing housing.
 Housing status documentation must be kept in client file.

B. ELIGIBILITY VS. TARGETING

- Eligibility is whether participant meets HUD’s minimum requirements.
- Targeting is the process of determining the target population to serve.
- Targeting decisions impact program design and program design decisions impact targeting. Targeting may focus on:
 - Specific homeless or at-risk sub-populations
 - Households at more imminent risk of homelessness
 - Households served based on program design
- Subgrantees may elect to implement more stringent targeting and/or eligibility requirements as long as all program participants meet the minimum eligibility criteria and the subgrantees comply with all local and federal requirements.

C. LOCAL DETERMINANTS

Agencies may add additional eligibility criteria

- Agencies must ensure additional criteria are applied consistently.
- HUD will look to see that this criteria is documented in subgrantee’s “Policies and Procedures”.

D. STAFF CERTIFICATION OF ELIGIBILITY FOR HPRP ASSISTANCE FORM

- A [Staff Certification of Eligibility for HPRP Assistance](#) must be completed for each participant and placed in case file.
- Staff Certification Form certifies that:
 - Household meets all eligibility criteria for HPRP assistance.
 - True and complete information was used to determine eligibility.
 - No conflict of interest exists related to the provision of HPRP assistance.

E. ELIGIBILITY RECERTIFICATION

- Client eligibility recertification is required every three months:
 - Using standard eligibility criteria; and
 - Determining appropriateness of type, level, and continuation of services.
- If the household's eligibility is recertified by someone other than the original intake worker, a new Staff Certification of Eligibility for HPRP Assistance (signed by the case manager and his/her supervisor) would be required. However, if the same individual recertifies the household, he/she would not need to complete an additional Staff Certification form.

F. INCOME DETERMINATION

Each household served with financial assistance and/or housing and stabilization services must be determined to be at or below 50% of Area Median Income (AMI) through an income determination process that includes identifying the applicable AMI, documenting income, and calculating household income. Documentation in the household files must meet HUD's income [HPRP Eligibility Determination and Documentation Guidance](#).

- **Area Median Income (AMI):** Income must be at or below 50% of AMI. AMI is based on state and community and updated annually at <http://huduser.org/DATASETS/il.html>.
- **Income:** Any money that goes to, or on behalf of, the head of the household or spouse (even if temporarily absent) or to any other household member.
- **Includes** current gross income of all adult household members and unearned income attributable to a minor (e.g., child support, TANF payments, SSI payment, and other benefits paid on behalf of a minor).
- **Gross Income:** The amount of income earned before any deductions (such as taxes and health insurance premiums) are made.
- **Current income:** Income that the household is currently receiving at the time of application or HPRP assistance.
- Income **recently terminated** should not be included.
- Current income at the **three month eligibility recertification** also based on the total income the household is receiving at the time of recertification.
- **Inclusions/Exclusions:** HPRP definition contains income "inclusions" (types of income to be counted) and "exclusions" (types of income that are not considered) for all adult members of a household. For detailed list of inclusions and exclusions, see [HPRP Eligibility Determination and Documentation Guidance](#)
- **Calculating income using [HPRP Income Eligibility Calculation Worksheet](#)**
 - Annualize based on documented current gross income for household.
 - Example: \$525 gross wages for most recent two week period
x 26 pay periods = \$13,650 annual income
- **Documentation of calculated income** relative to AMI must be kept in participant file.
- **Local income standards:** If local income standards are more stringent (e.g., 30% AMI) for targeting purposes the appropriate income level must be documented through the above mentioned determination process.

G. TREATMENT OF ASSETS

- Assets: Cash or material items that can be converted to cash quickly.
- Households are NOT required to spend down their assets in order to be eligible for HPRP assistance.
- Assets should be taken into account when determining whether the household has other financial resources sufficient to obtain or maintain housing.
- For list of income inclusions and exclusions see HPRP [Eligibility Determination and Documentation Guidance](#)

H. HOUSING STATUS DETERMINATION

Each household served with financial assistance and/or housing and stabilization services must be determined to be either at imminent risk of losing housing (Prevention) or homeless (Rapid Re-housing) through a housing status determination process that includes documentation of the household's current living situation. Documentation must meet HUD's [HPRP Eligibility Determination and Documentation Guidance](#) .

1. Prevention Clientele (At-Risk)

- The intent of Prevention Assistance is to assist households who are at the greatest risk of becoming literally homeless and would require emergency shelter in the absence of HPRP assistance. Possible living situations:
 - Housing rented by applicant
 - Doubled up with family or friends
 - Hospital or other institution
 - Hotels or motels not paid for by Federal, State or local government or charitable programs
- See potential Risk Factors for Prevention Assistance on pages 24-25 of [HUD Notice](#)
- Tips for Determining Prevention Clientele
 - Explore with client all housing options, resources, supports.
 - Create clear "paper trail" in case file.
 - Decisions should be allowable, reasonable and defensible.
 - Have alternative referrals/resources ready when "but for" test not met.
 - Conduct routine staff training and supervision.

2. Rapid Re-housing Clientele (Homeless)

- Many households have been recently affected by economic crisis; others have been "precariously housed" and/or homeless for longer periods of time. Possible living situations:
 - Sleeping in an emergency shelter
 - Sleeping in a place not meant for human habitation, such as cars, parks, abandoned building, streets/sidewalks
 - Staying in a hospital or other institution for up to 180 days but was sleeping in an emergency shelter or other place not meant for human habitation (cars, parks, streets, etc.) immediately prior to entry into the hospital or institution
 - Graduating from, or timing out of a transitional housing program
 - Victims of domestic violence

3. Housing Status Maintained

- When assisted with HPRP, participants maintain the housing status (At-Risk or Homeless) they had immediately prior to receiving assistance:
 - If homeless prior to HPRP, client still considered homeless while in HPRP.
 - If NOT homeless prior to HPRP (e.g. prevention) then client not considered homeless while in HPRP.

SECTION 3: ELIGIBLE PROGRAM ACTIVITIES AND EXPENSES

A. PROGRAM ACTIVITIES AND EXPENSES FOCUS

Eligible activities and expenses are intentionally focused on housing:

1. Financial assistance to help pay for rental housing, and/or
2. Services designed to keep people in housing or to find housing

The primary goal of HPRP assistance is to rapidly transition program participants to housing stability. Programs should ensure that there is a clear process for determining the type, level, and duration of assistance for each program participant.

There are four categories of eligible activities for the HPRP program:

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

B. CATEGORIES OF ELIGIBLE PROGRAM ACTIVITIES AND EXPENSES

1. Administrative Costs

Eligible Administrative Costs

- √ Accounting for the use of grant funds (issuing administrative salary and direct cost checks, etc.)
- √ Preparing reports for submission to SCSO
- √ Staff salaries associated with these administrative costs
- √ Training for staff who will administer the program or case managers who will serve program participants, as long as this training is *directly related to learning about HPRP*

Ineligible Administrative Costs

- ✗ Costs of issuing financial assistance
- ✗ Providing housing relocation and stabilization services.
- ✗ Carrying out eligible data collection and evaluation activities.
- ✗ Costs such as staff salaries, conducting housing inspections, and other operating costs should be included under one of the three other eligible activity categories.

2. Data Collection and Evaluation

- Each subgrantee is responsible for collecting and entering client data in compliance with the HPRP data standards and SCSO's reporting requirements.
- It is strongly recommended that data entries for HPRP be done the same day participant applications are taken.
- HPRP data collection and reporting is conducted through the Homeless Management Information System Database (HMIS) <http://hmis.utah.gov> or a comparable database for victims of Domestic Violence (DV)
- Reasonable and appropriate costs associated with operating the HMIS, or a comparable database, are allowable expenses, e.g.,
 - Hardware costs
 - Software costs (e.g., user licenses, annual support)
- Participation fees, if used or needed
- HMIS training (e.g., users, system administrator)
- Staff costs, recognizing possibility of staff turnover (e.g., data collection/entry/analysis, reporting, system operation)

- Data integration with comparable database (e.g., DV providers, legal services, legacy database)
- Agencies must comply if asked to participate in a HUD-sponsored research and evaluation of HPRP.
 - HPRP funds are eligible for costs to the agency if participating in HUD research and evaluation of the program.

3. Financial Assistance

a. Financial Assistance Cost Types:

1. Rental Assistance

- **Tenant-based** rental assistance can be provided to allow individuals and families to remain in their existing rental units (Prevention) or to help them obtain and maintain housing in rental units they select (Rapid Re-housing)
- **Short-term** (1-3 months), or medium-term (4-18 months).
- **May not exceed** 18 months.
- **Consecutive:** Needs not be consecutive months of assistance.
- **Arrears:** May include up to 6 months of arrears (each month counts as one month of assistance) regardless of when they were incurred, provided that the existence of the arrears prevents the eligible participant from remaining in, or obtaining, housing.
- **Eligibility:** Programs must certify income eligibility at least once every three months.
- **Lease Requirement:**
 - Written lease or occupancy agreement required
 - Must identify applicant as tenant, landlord as payee, property location, rent amount, terms.
 - Must be signed and dated by both parties.
- **Flexibility:** Sub-grantees have flexibility to determine the amount of rental assistance provided.
- **'Needs based':** Assistance should be "needs-based" providing the minimum amount needed to prevent program participant from become homeless or returning to homelessness in the near term.
- **Rent Reasonableness:** Rental assistance paid cannot exceed the actual rental cost, which must be in compliance with HUD's standard of rent reasonableness. See HUD's [Rent Reasonableness Worksheet](#) . Rent reasonableness is determined on a case-by-case basis and should consider the following:
 - The reasonableness in relation to rents being charged for comparable units in an unassisted market, taking into account the location, size, type, quality, amenities, management, and maintenance of each unit.
 - The rent should not be in excess of rents currently being charged by the same owner for comparable non-luxury units. As the notice states, this comparison can include units advertised for rent as well those actual rents charged.
 - Rent Reasonableness also applies to the payment of arrears as well as Prevention Assistance where there is a current lease in place. Rent Reasonableness requirements do not apply to arrears payments for a previous unit.
 - Comparable rents can be checked by using a market study, by reviewing comparable units advertised for rent, or with a note from the property owner verifying the comparability of charged rents to other units owned (for example, the landlord would document the rents paid in other units).

- Subgrantees must update rent comparisons a minimum of once per year.
- For monitoring purposes, HUD/SCSO will be looking to see that the subgrantee developed and followed a process to determine and document that the rent was reasonable and that the basis for the conclusion reached is supported by the evidence gathered.
- **Fair Market Rents (FMR):** FMRs are not applicable under HPRP. HPRP rental assistance may only be used to assist eligible households in units that meet rent reasonableness standards.

2. Security and Utility Deposits

- Do not count towards 18-month limit on rental assistance.
- Sub-grantees have discretion to determine how to handle security deposits. If subgrantee recovers the deposit, it must be treated/reported as program income.
- Agencies must certify that a unit has passed habitability and lead-based paint requirements on any unit a program participant will be moving into using HPRP funds for security and utility deposits.
- Security Deposit: Deposit landlord collects to secure against potential damage, etc., done to rental unit.
- Utility Deposit: Utility deposits are generally required to pay for service connection, often due to poor credit, lack of credit, or history of late payments or outstanding bills with utility company. Utility deposits are also required when utilities have been “shut-off” by utility company and household must pay full amount of outstanding bill to resume service.

3. Utility Payments

- May be used for up to 18 months, including up to 6 months of utility payments in arrears, provided that the program participant or a member of his/her household:
 - has an account in his/her name with a utility company, OR
 - has proof of responsibility to make utility payments, such as cancelled checks or receipts in his/her name from a utility company.
- Utilities eligible for assistance are heat, electricity, water, sewer and garbage collection.
 - ✗ Telephone and cable are not eligible expenses.
- Months need not be consecutive, or concurrent with rental assistance.
- Utility-only assistance is eligible, but HUD expects this will be rare and expects the following three factors to be confirmed and supported by documentation in the household file:
 1. the utility will be disconnected if full or partial payment is not made (and there is no law preventing shut off)
 2. the shut off will cause the housing to become unsafe or cause eviction; and
 3. no other utility assistance (e.g., LIHEAP) is available to prevent shut off.

4. Moving Costs

- May be used for allowable, reasonable and defensible moving costs, such as truck rental, hiring a moving company, or

- short-term storage fees for a maximum of 3 months or until the program participant is in housing, whichever is shorter.
- Agency must document circumstances surrounding the need to access these moving/storage services, as well as provide cost comparison with other local vendors.
- If agency decides to help a client relocate, the agency retains responsibility for ensuring all program requirements are met.
- ✗ Transportation costs for participants (e.g., bus, train) are **not** eligible.

5. Motel and Hotel Vouchers

- May be used for reasonable and appropriate motel and hotel vouchers for up to 30 days **only**:
 - if no appropriate shelter beds are available, AND
 - subsequent housing has been identified **but** is not immediately available for move-in by the program participant(s).

b. Financial Assistance Cost Type Rule

HPRP assistance payments cannot be made on behalf of eligible individuals or families for the same period of time and for the same cost types provided through another federal, state, or local program. Cost types are the categories of eligible HPRP financial assistance:

- rent
- security and utility deposits
- utility payments
- moving costs assistance, and
- hotel/motel vouchers.

- Question: Can rent arrears be paid with HPRP funds if an applicant has a Section 8 certificate or other type subsidy?
- Answer: While a household receiving an ongoing housing subsidy cannot receive HPRP rental assistance, HPRP can be used to help the household pay for up to six months of arrears in cases where the household has fallen behind on its portion of the payment due to a time lag between the household's change in income and the recalculation of the tenant rent contribution. Note that the payment of arrears is eligible because it represents a different period of time – i.e., the arrears represents a back payment of the client portion, while the current rental assistance is a payment going forward.

c. Other Eligible Financial Assistance Activities

- Staff costs to issue financial assistance (i.e.):
 - Costs of issuing financial assistance (i.e. case manager salary, etc.)
 - Providing housing relocation and stabilization services
 - Carrying out eligible data collection and evaluation activities
 - Cost of Habitability and Lead-Based Paint Visual Assessments

d. Transitional Housing Policy

- Eligible activities/expenses:
 - √ Providing assistance to someone timing out of a TH program that is going to be homeless.
- Ineligible activities/expenses:
 - ✗ Providing HPRP assistance to help someone move into a TH program
 - ✗ Providing assistance while someone is living in a TH program

e. Payment Verification/Documentation

Agencies are responsible for verifying and documenting all payments made on behalf of the program participant in an easily identifiable manner that can be monitored.

f. 3rd Party Payments:

Agencies must not make payments directly to program participants, but only to third parties, such as landlords or utility companies.

4. Housing Relocation and Stabilization Services

HPRP funds may be used for services that assist program participants with housing stability and placement for up to 18 months (short-term 1-3 months, or medium-term 4-18 months). These services are limited to the following eligible activities:

a. Case Management

- HPRP case management funds may be used for activities for the arrangement, coordination, monitoring, and delivery of services related to meeting the housing needs of program participants, and helping them obtain housing stability.
- Component services and activities may include:
 - counseling
 - developing, securing, and coordinating services
 - monitoring and evaluating program participant progress
 - assuring that program participants' rights are protected
 - developing an individualized housing and service plan, including a path to permanent housing stability subsequent to HPRP financial assistance.
- For more detailed information on Case Management, see [Case Management – Homeless Prevention and Rapid Re-housing](#)

b. Outreach and Engagement

HPRP funds may be used for services or assistance designed to publicize the availability of programs to make persons who are homeless or almost homeless aware of these and other available services and programs.

c. Housing Search and Placement

HPRP housing search and placement funds may be used for services or activities to assist individuals or households in locating, obtaining, and retaining suitable rental housing. This may include:

- tenant counseling,
- assisting individuals and households to understand leases,
- securing utilities,
- making moving arrangements,
- representative payee services concerning rent and utilities,
- mediation and outreach to property owners related to locating or retaining housing.

d. Legal Services

HPRP funds may be used for limited legal services to help people stay in their homes, such as services or activities provided by a lawyer or other person(s) under the supervision of a lawyer to assist program participants with legal advice and representation in administrative or court proceedings related to tenant/landlord matters or housing issues.

- ✘ Legal services related to mortgages are not eligible.

e. Credit Repair

HPRP funds may be used for services that are targeted to assist program participants with:

- Critical skills related to household budgeting,
- Money management,
- Assessing a free personal credit report, and
- ✘ Payment of credit arrears (e.g., credit cards, loans) is an ineligible financial assistance activity.

SECTION 4: INELIGIBLE AND PROHIBITED ACTIVITIES

A. LEVERAGING OTHER RESOURCES TO AVOID DUPLICATION

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

Subgrantees must ensure that the individuals and households receiving service are not also receiving the same assistance for the same time period through programs such as Workforce Development, VA, Community Action or Human Resource Agency programs.

B. MORTGAGE COSTS ARE INELIGIBLE

- ✘ Mortgage costs or any homeowner costs needed to assist with any fees, taxes, or other costs of refinancing a mortgage to make it affordable

C. OTHER INELIGIBLE AND PROHIBITED ACTIVITIES

- ✘ Charging a client/program participant a fee for service.
- ✘ Construction or rehabilitation expenses
- ✘ Credit card bills or other consumer debt
- ✘ Participant car repair or other transportation costs
- ✘ Participant travel costs
- ✘ Food
- ✘ Medical or dental care and medicines
- ✘ Clothing and grooming
- ✘ Home furnishings
- ✘ Child care
- ✘ Pet care
- ✘ Entertainment activities
- ✘ Work or education related materials
- ✘ Direct cash assistance to program participants
- ✘ Certifications, licenses, and general training classes
- ✘ Developing discharge planning programs in mainstream institutions such as hospitals, jails, or prisons

SECTION 5: INSPECTION/ASSESSMENT REQUIREMENTS

A. PURPOSE OF HABITABILITY INSPECTIONS AND LEAD-BASED PAINT VISUAL ASSESSMENTS

- HUD resources must only be spent on units that are safe, sanitary, and decent.
- Requirements are designed to protect the people served from unsafe or unhealthy living conditions.
- Without the inspections/assessments, we are
 - Putting the client at risk
 - Putting the grantee/subgrantee at risk
 - Putting HUD as risk

B. COST ELIGIBILITY

- Costs incurred conducting the inspections/assessments are HPRP-eligible expenses and may be charged under the Financial Assistance category.
 - Typically charged as Rental Assistance unless providing security deposit or utility-only assistance.

C. HABITABILITY INSPECTIONS STANDARDS

The standards for housing unit inspections under HPRP are the housing habitability standards listed in Appendix C of the [HUD Notice](#), and are described in [HPRP Unit Inspection Requirements](#)

1. Requirements

- Structurally sound
- Access/alternate means of egress
- Adequate space and security
- Air quality (each room must have natural or mechanical ventilation)
- Potable water
- Properly operating and private sanitary facilities
- Adequate/functioning heating and cooling facilities
- Adequate natural and/or artificial lighting and sufficient electrical sources
- Suitable/sanitary food preparation and storage
- Housing maintained in sanitary condition.
- Fire safety:
 - A minimum of one working smoke detector on each level of unit
 - Public and common areas must also have adequate number (1+) of working smoke detectors
- Grantees may require more stringent standards

2. Habitability Inspections Standards (HS) vs. Housing Quality Standards (HQS)

- HUD's Housing Quality Standards (HQS) are more stringent than Habitability Standards (HS).
- HPRP subgrantees may use either HS or HQS standard
- HQS requires a certified inspector, Habitability Standards do not.

3. When Must Habitability Inspections Be Conducted?

- Anytime a program participant is receiving financial assistance and moving into a new/different unit, and then on an annual basis for the term of HPRP assistance.
- Applies to both prevention and re-housing participants moving into unit.
- Does NOT apply to prevention participants remaining in an existing unit.
- Does NOT apply to a participant receiving services only (e.g., legal assistance).

4. Who Can Conduct Inspections?

- No specific training or certification is required.
- Subgrantees have flexibility in choosing an inspector:
 - HPRP program staff
 - Other agency staff
 - Vendor (hired by subgrantee)

5. State and Local Housing Codes

- Habitability Standards do not replace state and local housing codes.
- Likewise, compliance with local code does not replace the need for a habitability inspection.
- Typically, building will have a certificate of occupancy or other documentation that demonstrates compliance with local code.

6. Timing the Habitability Inspection

- HUD recommends that inspections be scheduled prior to the tenant signing the lease.
 - Inspection MUST be completed upon occupancy (i.e., move-in).
- Habitability inspections must be conducted annually during the term of HPRP assistance.

7. What if Unit Does Not Meet All of The Standards?

- Three options:
 - Landlord addresses deficiencies and a second inspection is conducted to ensure habitability (this must happen before assistance can be provided).
 - The client locates a different unit.
 - Subgrantee is unable to assist the client.

8. Documentation of Habitability Inspection

- Complete records of inspections and follow-up actions must be maintained in client files.
- Subgrantees have flexibility of documentation form, but it is recommended they use HPRP Housing Habitability Standards Inspection Checklist .
 - Inspection form must be signed and dated.

D. LEAD-BASED PAINT VISUAL ASSESSMENTS

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 25 CFR part 35, subparts A,B, M, and R shall apply to housing occupied by families receiving assistance through HPRP.

See [Lead-Based Paint Poisoning Prevention Act of 1973 – 24 CFR 35, Parts A, B, M, and R.](#)

Lead-Based Paint (LBP) Visual Assessments are more stringent requirements than the Habitability Inspection. The intention is to protect vulnerable families from potential lead-based paint hazards.

1. Visual Assessments vs. Lead-Based Paint (LBP) Inspections

- LBP Visual Assessments are sometimes referred to as LBP Inspections, but....
- Terms should not be used interchangeably.
- Terms imply different levels of rigor.
- LBP Visual Assessments must be done by a HUD-Certified Visual Assessor.
- NOT equivalent to a Certified Lead Professional (CLP)
- Various CLP titles may be used: Certified Paint Inspector, Certified Risk Assessor, Sampling Clearance Technician, etc.

2. Becoming a HUD-Certified LBP Visual Assessor

- Certification by completing a 20-minute online training on HUD's website at <http://www.hud.gov/offices/lead/training/visualassessment/h00101.htm>
- Training walks through how to identify deteriorated paint and how deteriorated paint must be treated.
- Agency may use certified program staff or hire certified contractor/vendor.

3. When Must a Visual Assessment be Conducted?

- Visual assessment must be completed for all units that meet the following three conditions:
 1. Household is or will be living in a unit that is being assisted with HPRP financial assistance (rent assistance, utility assistance, utility/security deposits, or arrears);
 2. Unit was constructed prior to 1978; and
 3. A child under the age of 6 or a pregnant female is/will be living in the unit.
- Applies to persons moving into new/different unit OR remaining in existing unit.
- Assessment must be prior to assistance, and annually thereafter.

4. Determining the Age of the Unit

- Program staff should use formal public records, such as tax assessment records, to establish the age of a unit. These records are typically maintained by the state or county and will include the year built or age of the property. In most areas, these records are available online. In the search field, try combining county name with one of the following phrases:
 - "property tax records"
 - "property tax database"
 - "real property sales"
- Print out a copy of the screenshot for the case file. If you have trouble finding this information online, contact your local Office of Tax and Revenue for assistance.

5. Unit Exemptions

- House built after 1978.
- Zero-bedroom or Single Room Occupancy (SRO) unit.
- X-ray or laboratory testing of painted surfaces by certified lead professional conducted and unit is certified to be lead-free.
- The property has had all lead-based paint identified and removed in accordance with HUD regulations.
- The client is receiving Federal assistance from another program, where the unit has already undergone a visual assessment within the past 12 months, e.g., if the client has a Section 8 voucher and is receiving HPRP assistance for a security deposit or arrears
 - In such cases, HPRP staff are required to obtain documentation that a visual assessment has been conducted from the agency administering the other form of assistance for the HPRP case file); or
 - It meets any of the other exemptions described in 24 CFR Part 35.115(a).

6. LBP Visual Assessment Documentation

- Subgrantees have flexibility of documentation, but it is recommended that they use the HPRP Lead-Based Screening Worksheet found at: http://www.hudhre.info/documents/HPRP_LeadScreen.doc
- Every case file must include documentation that:
 1. The unit was exempt (and why); OR
 2. The unit was not exempt, but a visual assessment was conducted and no problems were identified; OR

- 3. The unit was not exempt, a visual assessment was conducted, problems were identified, and they were repaired in accordance with HUD regulations.
- If any exemptions are met, then lead-based paint requirements are not triggered and no further action is needed.

7. Conducting the Visual Assessment

- Conduct walk-through of the property to identify problems with paint surfaces.
- If there are no signs of deteriorated paint, the unit can be approved for assistance.

8. When Deteriorated Paint is Identified – 3 Choices

- a. Problems with paint surfaces are repaired/stabilized.
 - ✘ Costs involved in repair of paint surfaces are not eligible with HPRP.
- b. Paint is tested to confirm presence of lead and paint stabilized.
 - ✘ Costs related to laboratory testing and stabilization are not eligible with HPRP.
- c. Client can be assisted with relocation.

9. Paint Stabilization and the “De Minimis” Level

- If deteriorated paint is identified, the size of the area of deterioration is evaluated. All deteriorated paint must be stabilized. The amount of deteriorated paint determines how it must be stabilized and whether clearance will be required. HUD refers to these amounts as the "de minimis" levels. They are as follows:
 - 20 square feet on exterior surfaces,
 - 2 square feet in any one interior room or space, or
 - 10% of the total surface area on an interior or exterior component with a small surface area like window sills, baseboards, and trim.
- [Comparison of De Minimis Requirements in Federal Lead-Based Paint Regulations](#)

10. Paint Stabilization

- If area of paint to be stabilized exceeds “de minimis” level:
 - Use of lead safe work practices and clearance is required.
 - Clearance required by Certified Lead Professional.
- If area of paint is below “de minimis” level:
 - Paint must be repaired but specific practices and clearance are not required. NOTE: working safely on lead-based paint is always highly recommended.

11. Determining How to Proceed: Questions to Ask Yourself:

- How much time is there to “save” the housing?
- How much work is required and what is the cost involved?
- Has the landlord already started eviction proceedings? He/she may or may not be willing to work with the household.
- What are the conditions of local housing market?
 - How expensive/difficult would it be to relocate the participant to a new unit?
 - How difficult would it be for the landlord to fill the unit if it was vacated?

12. Tips for Complying With Lead-Based Paint Requirements

- Instruct Case Managers to talk with clients about LBP requirements upon application for assistance.
 - Ensure clients have received HUD’s disclosure form and the “Protect Your Family From Lead in The Home” pamphlet from their landlords. Forms and pamphlet available at: <http://www.hud.gov/offices/lead/enforcement/disclosure.cfm>

- Informed tenants are more likely to watch for potential problems and proactively work with landlords.
- If working with a Prevention client in an existing unit contact the landlord immediately to discuss the lead requirements.
 - Landlord may tell you paint has been tested for lead. Obtain documentation.
 - Landlord may choose to repair areas of deteriorated paint prior to your assessment.
- If working with Prevention or Re-Housing client moving into another unit:
 - Instruct clients on what to look for as they view units.
 - Instruct clients to contact you to schedule the assessment prior to lease being signed.
 - Depending on staff availability, have staff accompany client when he/she returns to sign lease.

13. Tips on Complying with both Inspection and LBP Visual Assessment Requirements

- Different models may work depending on case volume and program design:
 - Dedicated inspectors(s) offer evening and weekend inspections.
 - Each case manager/housing search specialist conduct inspections
 - Block out specific days/time slots for inspections/assessments to increase efficiency.
- Train same staff persons to conduct both habitability inspections and lead visual assessments.
 - Staff should be able to conduct both at same time (as applicable).
 - Don't make clients wait and risk losing units.

See Links (page 36) for more information regarding [HPRP and Lead-Based Paint Requirements](#)

SECTION 6: DOCUMENTATION

A. DOCUMENTATION STANDARDS

Agencies are responsible to maintain adequate and easily identifiable documentation to determine the eligibility of program participants served. Documentation must demonstrate activities and expenses that are:

- Allowable
- Reasonable
- Defensible

1. Agencies must:

- Verify and document eligibility prior to providing HPRP assistance.
- Maintain documentation in participant case file.
 - Minimum acceptable types, *in order of preference*:
 - Written third party
 - Oral third party
 - Applicant self-declaration

2. Determining Acceptable Level of Documentation

- Subgrantees must make every effort to achieve the highest standard that is reasonable
 - depending on the program resources, i.e., funding, capacity, and pre-existing income verification process from other programs; and

- dependent on type of assistance:
 - Example: It is not reasonable to delay assistance for written third party documentation if delay results in literal homelessness occurring.
 - Example: It is reasonable to obtain written third party documentation if assistance is ongoing.
- Subgrantees must document reasons when using lower standard of documentation.

Ultimately, the most important thing to be mindful of is the “*but for*” rule. Case files should include clear documentation and assessment notes that demonstrate an assisted household would have become or would remain literally homeless if not for the HPRP assistance. ASK: if HUD, SCSO, or another entity were to conduct a monitoring visit, would they be able to clearly see that an assisted household was eligible based on case file documentation/notes? Periodic review of case files by program supervisors to assure adequate and clear documentation is strongly encouraged among all sub-grantees. Please see [HPRP Provider Self Assessment Tool: Client Procedures and Documentation](#)

B. INCOME DOCUMENTATION (listed in order of preference)

For detailed documentation information on specific forms of income, see [Eligibility Determination and Documentation Guidance](#)

1. Written verification

- Pay stubs (wages, salary, armed forces income)
- State or benefit notice
- Court order (alimony, child support)
- Federal or state tax return
- Dividend interest statement
- Other written verification of income:
 - Name of income source, and applicant name
 - Income amount and frequency
 - Contact information for authorized income source representative
 - Signed and dated by authorized income source representative

2. Oral verification

- Name of income source, and applicant name
- Income amount and frequency
- Contact information for authorized income source representative
 - Name, title, telephone number, date and time of conversation
- Signed and dated by HPRP staff who obtained oral verification

3. Self-declaration (only if written/oral verification cannot be obtained)

- Self declaration of housing status for participants who are at-risk of losing housing is acceptable ONLY in very limited circumstances. Must clearly document in case file, including all attempts to obtain third part verification of housing status. Self-declared cases will be monitored closely.
- HPRP Self-declaration of Income Template:
http://www.hudhre.info/documents/HPRP_IncomeDeclarationTemplate.doc

4. Timeliness of Income Documentation

- Documentation should be dated within 30 days prior to application
- Exception: public assistance benefits
 - Benefits statement received within past 12 months and reflecting current benefits acceptable.
 - Copy of recent bank statements showing receipt of benefits also acceptable.

C. HOUSING STATUS DOCUMENTATION (documentation listed in order of preference)

For detailed information see [HPRP Eligibility Determination and Documentation Guidance](#)

1. Homeless – (Rapid Re-Housing Status) – Living Situation and Documentation

Emergency shelter

- HMIS record showing shelter stay concurrent with HPRP entry date, OR if HMIS record cannot be obtained:
- [Homeless Certification Template](#) OR
- Shelter provider letter

Places not meant for human habitation

- [Homeless Certification Template](#), OR
- Street outreach provider letter, OR
- [Self-Declaration of Housing Status Template](#)
 - Self declaration of housing status for participants who are at-risk of losing housing is acceptable ONLY in very limited circumstances. Must clearly document in case file, including all attempts to obtain third party verification of housing status.

Hospital or other institution

- Letter from hospital/other institution, AND
- HMIS record if previously in shelter, OR
- [Homeless Certification Template](#), OR
- Shelter/outreach provider letter, OR
- [Self-Declaration of Housing Status Template](#)

Transitional Housing - (Only includes TH programs serving homeless persons – per HUD’s definition – and listed in the Continuum of Care’s most recent Housing Inventory Chart)

- [Homeless Certification Template](#), OR
- Transitional housing provider letter.

Domestic Violence

- [Self-Declaration of Housing Status Template](#)
 - HPRP worker must document attempt to obtain written third party verification and sign self-declaration

2. At Risk of Homelessness – (Prevention Status) – Living Situation & Documentation

Rented by Applicant: Non-payment of rent and/or other lease violation

- Eviction notice or court order, and
- Lease or other written occupancy agreement

Rented by Applicant: Utility non-payment

- Utility shut-off notice, and
- Lease or other written occupancy agreement (must indicate tenant responsibility for utility).

Rented by Applicant OR Other Housing Occupied by Applicant (i.e. family/friends):

Foreclosure on rental property

- Notice indicating building being foreclosed on, and
- Lease or other written occupancy agreement

Other Housing Occupied by Applicant (family/friends): Eviction by host family/friend

- Eviction letter, and
- Lease or other written occupancy agreement (indicating host family/friends as legal tenant), or
- Self-declaration. (Note: Self-declaration is only acceptable in extreme circumstances if third party documentation from host family/friend cannot be obtained.)

Rented by Applicant OR Other Housing Occupied by Applicant (i.e. family/friends): Uninhabitable conditions

- Notice from landlord/property manager, public health, code enforcement, fire marshal, child welfare or other government entity that housing is condemned, and
- Lease or other written occupancy agreement

Owned by Applicant: Foreclosure

- Foreclosure notice

Hospital or Other Institution: Institutional discharge

- Statement from hospital/institution

Hotel/Motels (not paid for by Fed/State/Local Government or Charities): Non-payment of hotel/motel

- Signed and dated applicant Self-declaration. (Note: Self-Declaration is only acceptable in extreme circumstances if third party documentation cannot be obtained.)
- HPRP worker must document attempt to obtain third party documentation and sign self-declaration form.
- HPRP work must document that hotel/motel was being paid for with applicant funds.

D. HOMELESS “BUT FOR” DOCUMENTATION

In addition to assessing and documenting the income and current housing situation of applicant households, subgrantees must also assess whether the household would be homeless “*but for*” HPRP assistance. This determination takes place at the initial client assessment as well as at each 3-month eligibility recertification. This requires subgrantees to work with participants to assess and document (e.g., case notes) these additional three circumstances:

- No appropriate subsequent housing options have been identified;
- The household lacks the financial resources to obtain immediate housing or remain in its existing housing; and
- The household lacks support networks needed to obtain immediate housing or remain in its existing housing.

This is a critical piece of determining eligibility for HPRP and can be the most subjective. A clear paper-trail in the applicant file must demonstrate that the eligibility determination process was reasonable and defensible. HPRP funds are limited and in order to ensure the funds are able to effectively serve the most clients possible, subgrantees must carefully consider *and document* who is served through HPRP by documenting:

1. Other Subsequent Housing Options Documentation

- Assessment form or other documentation stating that there are no other appropriate (i.e., safe, affordable, available) subsequent housing options. Assessment form must:

- Be documented (e.g., case notes) by HPRP case manager or other authorized staff.
- Include assessment summary or other statement indicating that applicant has no other appropriate housing options.
- Be signed and dated by HPRP case manager or other authorized HPRP staff.

2. Financial Resources and Support Networks Documentation

- Assessment form or other documentation (e.g., case notes) of financial resources AND support networks (i.e., friends, family or other personal sources of financial or material support) by HPRP case manager or other authorized HPRP staff.
- Assessment Form or other documentation must:
 - Be documented by HPRP case manager or other authorized staff.
 - Include review of current account balances in checking and savings accounts held by applicant household.
 - Include assessment summary or other statement indicating that applicant lacks financial resources and support networks to obtain other appropriate subsequent housing or remain in their housing.
 - Be signed and dated by HPRP case manager or other authorized HPRP staff.

For more detailed information on “But For” documentation see page 20 of the: [HPRP Eligibility Determination and Documentation Guidance](#)

SECTION 7: GRANT ADMINISTRATION

1. ADMINISTRATIVE REQUIREMENTS

- All States, Territories, Urban Counties, and Metropolitan cities receiving funds under HPRP shall be subject to the requirements of 24 CFR part 85.
- Non-profit subgrantees shall be subject to the requirements of 24 CFR part 84.

2. POLICIES AND PROCEDURES MANUAL

Subgrantees are expected to implement their HPRP programs based on a well defined, inclusive organizational and program specific Policies and Procedures Manual. These documents should outline their commitment to appropriately serve their clients and follow good practices. References to relevant law and HPRP requirements and regulations should be clear within these documents.

3. CONFIDENTIALITY OF CLIENT RECORDS



Each subgrantee must develop and implement procedures to ensure:

1. The confidentiality of records pertaining to any individual provided with assistance,
2. That the address or location of any assisted housing will not be made public, except to the extent that this prohibition contradicts a preexisting privacy policy of the grantee.

4. CONFLICTS OF INTEREST

1. General. With respect to the use of HPRP funds to procure services, equipment, supplies or other property, states, territories and units of general local government that receive HPRP funds shall comply with 24 CFR 85.36(b)(3), and non-profit subgrantees shall comply with 24 CFR 84.42. With respect to all other decisions involving the use of HPRP funds, the following restriction shall apply: No person who is an employee, agent, consultant, officer, or elected or appointed official of the grantee

and who exercises or has exercised any functions or responsibilities with respect to assisted activities, or who is in a position to participate in a decision-making process or gain inside information with regard to such activities, may obtain a personal or financial interest or benefit from the activity, or have an interest in any contract, subcontract, or agreement with respect thereto, or the proceeds thereunder, either for himself or herself or for those with whom he or she has family or business ties, during his or her tenure or for one year thereafter.

2. Exceptions. Upon the written request of the grantee, HUD may grant an exception to the restrictions in paragraph 1 above on a case-by-case basis when it determines that the exception will serve to further the purposes of the HPRP program and promote the efficient use of HPRP funds. In requesting an exception, the grantee must provide the following:

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

5. CONTRACTOR REIMBURSEMENT PROCESS

SCSO can support two methods of submitting claims for reimbursements. The first and preferred method is Request for Funds Lite (RFF-Lite). Instructions for the RFF Lite process can be found at: http://housing.utah.gov/scso/reimbursement_for_funds/documents/RFF-LITE.WebGrants.06.29.pdf The second is to submit full backup documentation.

- **Request For Funding (RFF) Lite**
Agency must be RFF Lite compliant for electronic draw downs. Contact SCSO to determine how your organization can achieve this.
- **Full Documentation**
The reimbursement claim must demonstrate eligible activity and require supporting documentation such as:
 - Client list
 - Specific service description
 - Staff names
 - Case workers number of hours case management
 - Copy of payment/check for rental assistance

The Process of RFF Review:

1. SCSO program staff reviews the claim for accuracy and expenditures in accordance with the scope of work and contract budget and either approves the claim for accounting review or puts the claim in correcting status and contacts the grantee regarding the reason(s) for not approving the claim.
2. DHCD Accounting Staff reviews the claim for numeric accuracy and either approves the claim for payment by the Division of Finance or puts the claim in correcting status and contacts SCSO Program Staff to note the reason for not approving the claim.
3. Division of Finance either cuts a physical check or makes an Electronic Funds Transfer (EFT) for agencies set up on Direct Deposit.

6. EXPENDITURE OF FUNDS

Each sub-grantee receiving State HPRP funds must:

- Expend no less than sixty (60) percent of the allocation within the first two (2) years, and
- One hundred (100) percent by month thirty (30) of grant execution, or risk the recapture and reallocation of HPRP funds to another agency.

SOCO reserves the right to review agency performance each quarter in order to ensure that this requirement is met. An agency with poor performance may have funds recaptured and reallocated to agencies that have performed well

7. HMIS REQUIREMENTS

As a condition of funding, each subgrantee shall collect and record client data in the Homeless Management Information System (HMIS) <http://hmis.utah.gov> or a comparable database for victims of Domestic Violence (DV). Information needed to provide quarterly and annual reports to HUD will be pulled from the HMIS system by the SCSO four calendar days after the last day of each calendar quarter.

8. MONITORING REQUIREMENTS

SCSO will monitor subgrantee's performance in providing Financial Assistance and Housing Relocation and Stabilization Services by any or all of the following types of reviews:

- Fiscal Review
- Desktop Review
- Program Review
- Interview staff and project participants
- Telephone consultation

Fiscal Review: SCSO may conduct on-site review of financial documentation relevant to the administration of the grant agreement or contract. This would include both backup documentation related to reimbursement requests and a review of internal controls, financial policies and procedures of the organization and reviews of prior or related audit materials, including independent audit reports.

Desktop Review: SCSO may perform a review from a location other than on site, which may include both interviewing the grantee on program implementation and/or documentation submitted as part of reimbursement requests and/or program implementation.

Program Review: SCSO may conduct onsite review of program implementation and adherence to contractual program agreements and program rules and regulations. In this case, SCSO would provide an on-site performance assessment and written conclusions and recommendations following the visit.

Monitoring will include the following which are federal requirements:

- Formal and advance notification of the visit
- Pre-visit preparation based on review of existing information
- Records related to monitoring reviews
- Review of HPRP eligible Activities Requirement
- Assurance that HPRP funds are being utilized as originally planned and for the eligible activities
- Determination whether costs are properly classified and if spending limits on certain activities have been properly adhered to
- Assurance that the activities funded by HPRP funds benefit homeless persons
- Review and check that financial regulations and management requirements are appropriately being followed e.g. financial records, reports or audits
- Assurance that program disbursements or draw down funds are in compliance with SCSO requirements
- Review of client record files
- Notation of any changes in the use of HPRP funds or any other issues

Monitoring guidance tools:

- [Utah HPRP Monitoring Form](#) (Appendix 14, page 60)
This document will be used for SCSO Monitoring
- [HPRP PROVIDER SELF-ASSESSMENT: CLIENT PROCEDURES & DOCUMENTATION](#)
This document is designed to provide front-line HPRP providers with a process and tool for assessing and strengthening their compliance with HPRP client procedural and

documentation requirements. This tool is intended to:

1. Help HPRP providers better understand WHAT specific HPRP client procedures and documentation are HUD-required (and to consider some non-required best practices);
2. Provide a work-flow presentation of WHEN different procedures and documentation are required (case opening, quarterly, annual, and case closing); and
3. Furnish an adaptable tool for HOW providers can formally assess their own compliance with HUD requirements, identify and carry out corrective actions, and better prepare for HPRP program monitoring visits by HUD staff.

9. RECORD KEEPING

Each subgrantee must keep any records and make any reports (including those pertaining to race, ethnicity, gender, and disability status data) that HUD may require within the timeframe required.

10. REPORTING TIMELINES

- Quarterly Progress Report (QPR) due five (4) days following the end of each quarter:
 - 1st Quarter – October 4th
 - 2nd Quarter – January 4th
 - 3rd Quarter – April 4th
 - 4th Quarter – July 4th
- ARRA Job Calculation Report due three (3) days following the end of each quarter:
 - 1st Quarter – October 3rd
 - 2nd Quarter – January 3rd
 - 3rd Quarter – April 3rd
 - 4th Quarter – July 3rd
- Monthly Reconciliation Tool due by 5th of each month reconciling prior month's HIMS reporting.

11. SANCTIONS

If SCSSO determines that a recipient is in noncompliance with the regulations, the State may take any of the following sanctions, as appropriate:

1. Issue a warning letter that further failure to comply with such requirements will result in a more serious sanction;
2. Condition a future grant;
3. Direct the grantee to stop the incurring of costs with grant amounts;
4. Require that some or all of the grant amounts be remitted to HUD;
5. Reduce the level of funds the grantee would otherwise be entitled to receive; or
6. Elect not to provide future grant funds to the grantee until appropriate actions are taken to ensure compliance.

12. TERMINATION OF HOUSING ASSISTANCE

The subgrantee may terminate assistance to a program participant who violates program requirements. In terminating assistance to a program participant, the subgrantee must provide a formal process that recognizes the rights of individuals receiving assistance to due process of law.

This process, at a minimum, must consist of:

1. Written notice to the program participant containing a clear statement of the reasons for termination;
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.

SECTION 8: OTHER FEDERAL REQUIREMENTS

1. 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 HPRP.

2. ENVIRONMENTAL REQUIREMENTS

This 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), this 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 this 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

3. EQUAL PARTICIPATION OF RELIGIOUS ORGANIZATIONS

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

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

A religious organization that participates in HPRP 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 HPRP 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 HPRP-funded services, without removing religious art, icons, scriptures, or other religious symbols. In addition, a HPRP-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.

An organization that participates in the HPRP program shall not, in providing program assistance, discriminate against a program participant or prospective program participant on the basis of religion or religious belief.

If a state or local government voluntarily contributes its own funds to supplement federally funded activities, the state or local government has the option to segregate the federal funds or commingle them. However, if the funds are commingled, the requirements listed above apply to all of the commingled funds

4. 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. Subgrantees 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.

5. NONDISCRIMINATION AND EQUAL OPPORTUNITY REQUIREMENTS

Subgrantees must comply with all applicable fair housing and civil rights requirements in 24 CFR 5.105(a). In addition, grantees must make known that HPRP rental assistance and services are available to all on a nondiscriminatory basis and ensure that all citizens have equal access to information about HPRP and equal access to the financial assistance and services provided under this program. Among other things, this means that each grantee must take reasonable steps to ensure meaningful access to programs to persons with limited English proficiency (LEP), pursuant to Title VI of the Civil Rights Act of 1964. This may mean providing language assistance or ensuring that program information is available in the appropriate languages for the geographic area served by the jurisdiction and that limited English proficient persons have meaningful access to HPRP assistance. This will be a particular issue for state grantees that may not be aware of LEP speaking populations in jurisdictions that are not normally served with ESG funds. To assist grantees, the Department published the "Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons" (72 FR 2732; January 22, 2007). In addition, all notices and communications shall be provided in a manner that is effective for persons who are deaf or hard of hearing, have visual, and other communication-related disabilities consistent with section 504 of the Rehabilitation Act of 1973 and implementing regulations at 24 CFR 8.6.

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

6. 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 HPRP. 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.

7. PROCUREMENT OF RECOVERED MATERIALS

State agencies and agencies of a political subdivision of a state that are using assistance under a HUD program for procurement, and any person contracting with such an agency with respect to work performed under an assisted contract, must comply with the requirements of section 6002 of the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act. In accordance with section 6002, these agencies and persons must procure items designated in guidelines of the Environmental Protection Agency (EPA) at 40 CFR part 247 that contain the highest percentage of recovered materials practicable, consistent with maintaining a satisfactory level of competition,

where the purchase price of the item exceeds \$10,000 or the value of the quantity acquired in the preceding fiscal year exceeded \$10,000; must procure solid waste management services in a manner that maximizes energy and resource recovery; and must have established an affirmative procurement program for procurement of recovered materials identified in the EPA guidelines.

SECTION 9: REFERENCE INFORMATION

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DEFINITIONS

ARRA - The American Recovery and Reinvestment Act of 2009.

Administrative Cost - Eligible costs associated with the accounting for use of HPRP funds, preparing reports for submission to SCSO, and grantee and sub-grantee staff salaries associated with administrative costs.

Audit Trail – A complete record of expenditures including all requests for purchases, who and how the purchase was approved, source of funds used for the expense, date of acquisition, and costs.

Authorized Signatures – The signature of an executive officer, agency director, or other responsible employee designated by a recipient agency as an “Authorized Person” on the Request for Funds Authorization form.

CFR - Code of Federal Regulations - The Code of Federal Regulations (CFR) is the codification of the general and permanent rules published in the Federal Register by the executive departments and agencies of the Federal Government. It is divided into 50 titles that represent broad areas subject to Federal regulation. Each volume of the CFR is updated once each calendar year and is issued on a quarterly basis.

Case Management – A Housing Relocation and Stabilization activity consisting with the arrangement, coordination, monitoring, and delivery of services related to meeting the housing needs of program participants. Agencies are expected to include a component of services and activities which may include: counseling, developing, securing, and coordinating services; monitoring and evaluating program participants’ progress towards goals, assuring that program participant’s rights are protected; developing individualized housing and service plans, including a path to permanent housing stability once the participant is no longer receiving HPRP financial assistance.

Data Collection and Evaluation – An eligible HPRP activity that includes the collection and entering of client data in compliance with the HPRP data standards and the Division’s reporting requirements. Data collected is entered into the Homeless Management Information System Database (HMIS) and reported to the Division via a QPR.

Disabling Condition – Defined by HUD as a “diagnosable substance use disorder, serious mental illness, developmental disability, or chronic physical illness or disability, including co-occurrence of two or more of these conditions” A disabling condition limits an individual’s ability to work or perform one or more activities of daily living.

Eligible Activity – An activity provided under the HPRP program to clients who have met certain criteria as defined in the HPRP regulations and the agency providing service.

Emergency Shelter – Any facility the **primary purpose** of which is to provide temporary shelter on a first-come, first-served basis for the homeless, where clients must leave in the morning and there is no guaranteed bed for the next night, or other **short-term** transitional shelter (less than 6 months).

Emergency Shelter Provider Letter – Must:

- Be on shelter provider letterhead
- Identify shelter program
- Include statement verifying current shelter occupancy of HPRP applicant, including most recent entry and exit (if applicable dates).
- Be signed and dated by shelter provider

Eviction Letter – Must:

- Identify the HPRP applicant and unit where applicant is residing.
- Indicate that applicant must leave owner's/renter's housing.
- Be signed and dated by the host owner/renter.

Eviction Notice/Court Order – Must:

- Identify HPRP applicant and unit where applicant is the leaseholder.
- Indicate that applicant must leave their housing.
- Be signed and dated by owner/landlord or court.

FTE- Full Time Equivalent used for reporting jobs created and/or retained at the grantee and sub grantee level as a result of the HPRP program.

Families – One or more adults with dependent children under the age of 18, or with dependent adults.

Financial Assistance – An eligible activity funded through the HPRP program that provides housing assistance via rental, utility, security/utility deposit, or moving cost assistance, for up to 18 months.

Foreclosure Notice – Must:

- Identify the building or unit where HPRP applicant is the leaseholder or is otherwise residing.
- Indicate that housing is being foreclosed on.
- If written notice to applicant, be signed and dated.

Grantee – The direct recipient of grant funds. In the HPRP program, SCSO is the “grantee” responsible to HUD for proper execution of the grant program through sub-contracted providers (subgrantees) of homeless services within the State.

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

Homeless – Defined in Section 103 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11302)

1. An individual who lacks a fixed, regular, and adequate night time residence; and
2. An individual who has a primary night-time residence that is:
 - A supervised public or privately operated shelter designed to provide temporary living accommodations (include welfare hotels, congregate shelters, and transitional housing for the mentally ill);
 - An institution that provides a temporary residence for individuals intended to be institutionalized; or
 - A public or private place not designed for, or ordinarily used as a regular sleeping accommodation for human beings.

This term does not include any individual imprisoned or otherwise detained under an act of Congress or a State law.

Homeless Certification – A Homeless Certification is a standardized form that, at a minimum, contains the following:

- Name of the shelter program/outreach program
- Statement verifying current living situation of HPRP applicant
- Signed and dated by authorized shelter/outreach provider representative

Homeless Management Information System (HMIS) – HUD has required the implementation and operation of management information systems for the purpose of collecting unduplicated counts of homeless and at-risk of homeless clients assisted with HPRP funds. HPRP data standards are collected and entered into the HMIS database to track services and assistance provided to eligible clients. Sub-recipients of HPRP funds are required to participate and report in the HMIS system.

Homeless Prevention – An eligible activity that provides financial assistance to eligible clients at risk of becoming homeless. Assistance may be provided in the form of: rental, utility, security and utility deposits. Primarily, rental assistance when eviction is imminent, utility assistance when services are being terminated, and 1st month’s rent, security or utility deposits for obtaining permanent housing. For the HPRP program, clients receiving HPRP assistance would either be homeless, or at risk of becoming homeless, but for the HPRP assistance.

Homeless Street Outreach Provider or Referral Source Letter – Letter may be from the HPRP-funded rapid re-housing provider if the provider also provides outreach to persons on the street as part of engagement and admission activities. Letter must:

- Be on outreach provider or referral agency letterhead
- Identify outreach program or referral agency
- Include statement verifying current homeless status of HPRP applicant
- Be signed and dated by outreach provider or referral agency

Household - A household is a single individual or group of persons who together apply to an HPRP-funded program for assistance and together meet the conditions outlined in the HPRP Notice for eligible program participants. Note that if two unrelated individuals are joint parties to a lease, a grantee must consider total household income to determine eligibility (i.e., either the whole household is eligible for assistance, or the whole household is not).

Hospital or Other Institution Letter - Must:

- Be on hospital or other institution letterhead.
- Include statement verifying current hospital/institution stay of HPRP applicant.
- Include hospital/institution admission and discharge dates verifying that stay has been for 180 days or less.
- Be signed and dated by hospital/institution representative.

Housing Standards – Housing assisted under the HPRP program must provide safe and sanitary housing that is in compliance with certain habitability standards.

HUD – The U.S. Department of Housing and Urban Development.

Income: Any money that goes to, or on behalf of, the head of the household or spouse (even if temporarily absent) or to any other household member.

- Includes current gross income of all adult household members and unearned income attributable to a minor (e.g., child support, TANF payments, SSI payment, and other benefits paid on behalf of a minor)

Income Inclusions/Exclusions: HPRP definition contains income “**inclusions**” (types of income to be counted) and “**exclusions**” (types of income that are not considered) for all adult members of a household

Income Limit- Households receiving HPRP assistance must be at or below 50% of Area Median Income for the County of residence. Note: Service providers may restrict the income limits of clients receiving assistance to less than 50% AMI as long as the eligibility criteria is made available in advance and in writing to households seeking assistance. Verification of income eligibility must be obtained and maintained in the client file.

Ineligible and Prohibited Activities- Specific activities not allowed using HPRP funds as identified in the program regulations and the Division’s Program Guidelines Manual.

Internal Controls – The combination of policies, procedures, personnel, defined responsibilities, and records that allow an organization to maintain adequate oversight and control of its finances.

Lead-Based Paint Poisoning Prevention Act of 1973 – Regulation enacted to help prevent lead-poisoning in young children and pregnant women. The Act, and its applicable Lead Safe Housing Rule regulations found at 24 CFR 35, Parts A, B, M, and R, provide guidance to ensure that a home constructed prior to 1978 is safe for occupancy and does not contain lead-based paint, known to be especially harmful to young children and pregnant women. Includes requirements to notify a household with young children and pregnant women that the home constructed prior to 1978 may contain lead contaminants, along with a guide on how to inspect a unit to ensure compliance with the Rule.

Local Government – A political subdivision of the State of Utah, including, without limitation, a city, county, irrigation district, water district or water conservancy district.

Medium-term assistance - Financial assistance that is provided for 3 - 18 months.

Outreach Provider or Referral Source (e.g., local law enforcement agency) Letter – Letter may be from the HPRP-funded rapid re-housing provider if the provider also provides outreach to persons on the street as part of engagement and admission activities. Letter must:

- Be on outreach provider or referral agency letterhead
- Identify outreach program or referral agency
- Include statement verifying current homeless status of HPRP applicant
- Be signed and dated by outreach provider or referral agency

Private Non-Profit Organization – A secular or religious organization described in Section 501(c) of the Internal Revenue Code of 1954 which is (a) exempt from taxation under Subtitle A, Title 26 of the Code, (b) has an accounting system and voluntary board, and (c) practices nondiscrimination in the provision of assistance.

QPR- The Quarterly Progress Report that is due to SCSO by the 3rd of the month following the end of each quarter.

Recertification – HPRP regulations require that a program participants' eligibility to receive HPRP assistance be re-certified upon entry into the program and every three (3) months thereafter.

Rent Reasonableness – 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. To make this determination, the grantee or subgrantee should consider (a) the location, quality, size, type, and age of the unit; and (b) any amenities, housing services, maintenance and utilities to be provided by the owner. Comparable rents can be checked by using a market study, by reviewing comparable units advertised for rent, or with a note from the property owner verifying the comparability of charged rents to other units owned (for example, the landlord would document the rents paid in other units). For more information, see HUD's worksheet on rent reasonableness at: www.hud.gov/offices/cpd/affordablehousing/library/forms/rentreasonablechecklist.doc.

Risk Assessment/Risk Factors – Regulations require that households receiving HPRP assistance meet minimum eligibility conditions, as identified in program regulations, in order to receive financial assistance. HUD encourages agencies providing assistance to consider more restrictive factors when designing local programs and when determining a household's level of need for receiving assistance, by identifying certain risk factors and eligibility criteria over and above the minimum standards required in the regulations. These criteria must be made available in advance and in writing to households seeking HPRP assistance. The Division allows providers receiving State HPRP to develop more restrictive eligibility criteria as needed to help meet the needs of a local community.

SCSO – State Community Services Office, State of Utah Department of Community and Culture, Division of Housing and Community Development, and administrator of the HPRP funds to the State Utah for the U.S. Department of Housing and Urban Development.

Service Provider – Any entity that is successfully involved in providing needed services to Nevada’s homeless. For the purpose of the ESG program, any entity that has successfully applied for grant funds and has been awarded a portion of the Division’s Emergency Shelter Grant funds with which to support planned services to Nevada’s homeless.

Shelter provider letter – Letter must:

- Be on shelter provider letterhead
- Identify shelter program
- Include statement verifying current shelter occupancy of HPRP applicant, including most recent entry and exit (if applicable) dates
- Be signed and dated by shelter provider

Short-term assistance – Financial assistance that is provided for 1-3 months.

Staff Certification of Eligibility – An affidavit that serves as documentation that the HPRP-assisted household meets all eligibility criteria for HPRP assistance, signed by staff person(s) who determined HPRP eligibility. Once signed the affidavit is placed in the client file.

State – State of Utah

Subgrantee - A recipient of State HPRP funds, usually a local jurisdiction or non-profit, assigned the task of carrying out the activities of the HPRP program on behalf of SCSO.

Transitional Housing – For the purposes of HPRP assistance, housing that extends past the “3 days to 3 months” reasonable period for temporary housing (emergency shelter). HUD defines transitional housing as having the “purpose of moving homeless individuals and families to permanent housing within 24 months”. Homeless clients exiting transitional housing are eligible for HPRP assistance.

Transitional Housing Provider Letter – Must:

- Be on transitional housing provider letterhead
- Identify transitional housing program.
- Include statement verifying current transitional housing occupancy of HPRP applicant.
- Include statement verifying that HPRP applicant is graduating from or timing out of transitional housing program.
- Include statement verifying HPRP applicant was residing in emergency shelter or place not meant for habitation immediately prior to transitional housing admission.
- Be signed and dated by transitional housing provider.

Utility Shut-Off/Non-Payment Notice – Must:

- Identify the HPRP applicant and unit where applicant is the leaseholder.
- Indicate that utility shut-off/disconnection will be shut-off if payment not received.
- Be signed and dated by utility company representative and/or include utility company contact information.

Vendor - A dealer, distributor, merchant, or other seller providing the Division or sub grantee/sub recipient with generally required goods or services that have been purchased by the grantee/sub grantee for the conduct of the HPRP program. Vendors are not subject to the terms and conditions of the HPRP grant agreement, but are subject to the terms and conditions of the contract between the grantee/sub grantee and vendor.

LINKS

Guidance and Monitoring

HPRP Notice

http://www.hudhre.info/documents/HPRP_NoticeRedline_6_08_09.pdf

Eligibility Determination and Documentation Guidance

http://www.hudhre.info/documents/HPRP_EligibilityAndDocumentationGuidance.pdf

Provider Self-Assessment: Client Procedures & Documentation

http://www.hudhre.info/documents/HPRP_ProviderSelfAssessment.doc

Utah HPRP Monitoring Form

(See appendix 14, Page 60)

Utah HMIS

<http://hmis.utah.gov/>

Case Management – Homeless Prevention and Rapid Re-housing

http://www.hudhre.info/documents/HPRP_CaseManagement.pdf

General

Homeless Certification Template (See Appendix 1, page 38)

http://www.hudhre.info/documents/HPRP_HomelessCertificationTemplate.doc

Staff Certification of Eligibility for HPRP Assistance (See Appendix 2, page 40)

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

Self-Declaration of Housing Status Template (See Appendix 3, page 41)

http://www.hudhre.info/documents/HPRP_HousingStatusTemplate.doc

Rent Reasonableness Checklist and Certification (See Appendix 4, page 42)

<http://www.hud.gov/offices/cpd/affordablehousing/library/forms/rentreasonablechecklist.doc>

Request for Funds (RFF Lite) Instructions

http://housing.utah.gov/scso/reimbursement_for_funds/documents/RFF-LITE.WebGrants.06.29.pdf

Housing Inspections

HPRP Unit Inspection Requirements (See Appendix 5, page 43)

http://www.hudhre.info/documents/HPRP_InspectionFactSheet.pdf

HPRP Housing Habitability Standards Inspection Checklist (See Appendix 6, page 45)

<http://www.hudhre.info/documents/HabitStandardsChecklist.doc>

Income

[HUD Program Income Limits](http://huduser.org/DATASETS/il.html)

<http://huduser.org/DATASETS/il.html>

[Income Eligibility Calculation Worksheet](http://www.hudhre.info/documents/HPRP_IncomeEligibilityCalculationWorksheet.xls)

http://www.hudhre.info/documents/HPRP_IncomeEligibilityCalculationWorksheet.xls

[Verification of Income Template](http://www.hudhre.info/documents/HPRP_IncomeVerificationTemplate.doc) (See Appendix 7, page 47)

http://www.hudhre.info/documents/HPRP_IncomeVerificationTemplate.doc

[Self-Declaration of Income Template](http://www.hudhre.info/documents/HPRP_IncomeDeclarationTemplate.doc) (See Appendix 8, page 48)

http://www.hudhre.info/documents/HPRP_IncomeDeclarationTemplate.doc

[HPRP Area Median Income \(AMI\) Limits- Changes Between 2009 and 2010](http://www.hudhre.info/documents/50pctAMI2009vs2010.pdf)

<http://www.hudhre.info/documents/50pctAMI2009vs2010.pdf>

Lead-Based Paint

[Lead-Based Paint Poisoning Prevention Act of 1973 – 24 CFR 35, Parts A, B, M, and R](http://brgov.com/DEPT/ocd/pdf/1012_3final.pdf)

http://brgov.com/DEPT/ocd/pdf/1012_3final.pdf

[Understanding the Lead-Based Paint Requirements: Guidance for HPRP Grantees](http://www.hudhre.info/documents/HPRP_LeadPaintGuidance.pdf)

http://www.hudhre.info/documents/HPRP_LeadPaintGuidance.pdf

[HPRP Lead-Based Paint Screening Worksheet](http://www.hudhre.info/documents/HPRP_LeadScreen.doc) (See Appendix 9, page 49)

http://www.hudhre.info/documents/HPRP_LeadScreen.doc

[HPRP Lead-Based Paint Resident Instructions Template](http://www.hudhre.info/documents/HPRP_LeadPaintResidentInstrux.doc) (See Appendix 10, page 52)

http://www.hudhre.info/documents/HPRP_LeadPaintResidentInstrux.doc

[HPRP Lead-Based Paint Property Owner Instructions Template](http://www.hudhre.info/documents/HPRP_LeadPaintOwnerInstrux.doc) (See Appendix 11, page 54)

http://www.hudhre.info/documents/HPRP_LeadPaintOwnerInstrux.doc

[HPRP Lead Based Paint Property Owner Certification Template](http://www.hudhre.info/documents/HPRP_LeadPaintOwnerCert.doc) (See Appendix 12, page 58)

http://www.hudhre.info/documents/HPRP_LeadPaintOwnerCert.doc

[HPRP Lead-Based Paint Documentation Checklist](http://www.hudhre.info/documents/HPRP_LeadPaintChecklist.doc) (See Appendix 13, page 59)

http://www.hudhre.info/documents/HPRP_LeadPaintChecklist.doc

[HUD Lead-Based Paint Visual Assessment Training](http://www.hud.gov/offices/lead/training/visualassessment/h00101.htm)

<http://www.hud.gov/offices/lead/training/visualassessment/h00101.htm>

[Comparison of De Minimis Requirements in Federal Lead-Based Paint Regulations](http://www.afhh.org/aa/aa_hh_policy_national_policy_Comparison_Deminimis_Reqs.pdf)

http://www.afhh.org/aa/aa_hh_policy_national_policy_Comparison_Deminimis_Reqs.pdf

Appendix 1

HOMELESSNESS PREVENTION AND RAPID RE-HOUSING PROGRAM

Homeless Prevention and Rapid Re-Housing Program (HPRP)

HOMELESS CERTIFICATION

HPRP Applicant Name: _____

- Household without dependent children (complete one form for each adult in the household)
 Household with dependent children (complete one form for household)
Number of persons in the household: _____

This is to certify that the above named individual or household is currently homeless based on the check mark, other indicated information, and signature indicating their current living situation.

Check only one box and complete only that section

Living Situation: place not meant for human habitation (e.g., cars, parks, abandoned buildings, streets/sidewalks)

- The person(s) named above is/are currently living in (or, if currently in hospital or other institution, was living in immediately prior to hospital/institution admission) 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 station, airport, or camp ground.

Description of current living situation:

Homeless Street Outreach Program

Name: _____

This certifying agency must be recognized by the local Continuum of Care (CoC) as an agency that has a program designed to serve persons living on the street or other places not meant for human habitation.

Examples may be street outreach workers, day shelters, soup kitchens, Health Care for the Homeless sites, etc.

Authorized Agency Representative Signature: _____ Date: _____

Living Situation: Emergency Shelter

- The person(s) named above is/are currently living in (or, if currently in hospital or other institution, was living in immediately prior to hospital/institution admission) a supervised publicly or privately operated shelter as follows:

Emergency Shelter Program Name:

This emergency shelter must appear on the CoC's Housing Inventory Chart submitted as part of the most recent CoC Homeless Assistance application to HUD or otherwise be recognized by the CoC as part of the CoC inventory (e.g. newly established Emergency Shelter).

Authorized Agency Representative Signature: _____ Date: _____

Living Situation: Transitional Housing

The person(s) named above is/are currently living in a transitional housing program for persons who are homeless. The persons(s) named above is/are graduating from or timing out of the transitional housing program:

Transitional Housing Program Name: _____

This transitional housing program must appear on the CoC's Housing Inventory Chart submitted as part of the most recent CoC Homeless Assistance application to HUD or otherwise be recognized by the CoC as part of the CoC inventory (e.g. newly established Transitional Housing program).

Immediately prior to entering transitional housing the person(s) named above was/were residing in:

emergency shelter OR a place unfit for human habitation

Authorized Agency Representative Signature: _____ Date: _____

Appendix 2

HOMELESSNESS PREVENTION AND RAPID RE-HOUSING PROGRAM

Homelessness Prevention and Rapid Re-Housing Program (HPRP) STAFF CERTIFICATION OF ELIGIBILITY FOR HPRP ASSISTANCE

Purpose: This form serves as documentation that: (1) the program participant named below meets all eligibility criteria for HPRP assistance; (2) this eligibility determination is based on true and complete information; (3) neither the staff member making this determination nor his or her supervisor are related to the program participant through family, business or other personal ties; and (4) this eligibility determination has not resulted from, nor will result in, any financial benefit to the staff member making this determination, his or her supervisor, or anyone related to them. **Instructions:** This form must be completed for each program participant upon the determination of his or her eligibility for HPRP assistance. This form must be signed and dated by the HPRP staff person who makes this determination and that person's supervisor and must be kept in the program participant's case file. This form will remain valid, unless a different staff person re-determines the program participant's eligibility, in which case a new form will be required.

Instructions: This form must be completed for each program participant upon the determination of his or her eligibility for HPRP assistance. This form must be signed and dated by the HPRP staff person who makes this determination and that person's supervisor and must be kept in the program participant's case file. This form will remain valid, unless a different staff person re-determines the program participant's eligibility, in which case a new form will be required.

Head of Household Name:
Name of all household members:*

**All members of the household that will benefit from HPRP should be listed here.*

Required certifications: Each person signing below certifies to the following: (1) To the best of my knowledge, the program participant named above meets all requirements to receive assistance under the Homelessness Prevention and Rapid Re-Housing Program (HPRP). (2) To the best of my knowledge and ability, all of the information used in making this eligibility determination is true and complete. (3) I am not related to the program participant through family, business or other personal ties. (4) To the best of my knowledge, neither I nor anyone related to me has received or will receive any financial benefit for this eligibility determination. (5) I understand that fraud is investigated by the Department of Housing and Urban Development, Office of Inspector General, and may be punished under Federal laws to include, but not limited to, 18 U.S.C. 1001 and 18 U.S.C. 641. (6) I understand that if any of these certifications is found to be false, I will be subject to criminal, civil and administrative penalties and sanctions.

HPRP Staff Signature: _____ Date: _____
HPRP Supervisor Signature: _____ Date: _____

Appendix 3

HOMELESSNESS PREVENTION AND RAPID RE-HOUSING PROGRAM

Homeless Prevention and Rapid Re-Housing Program (HPRP) SELF-DECLARATION OF HOUSING STATUS

HPRP Applicant Name: _____

- Household without dependent children (complete one form for each adult in the household)
 Household with dependent children (complete one form for household)
Number of persons in the household: _____

This is to certify that the above named individual or household is currently homeless or at-risk of homelessness, based on the following and other indicated information and the signed declaration by the applicant.

Check only one:

- I [and my children] am/are currently homeless and living on the street (i.e. a car, park, abandoned building, bus station, airport, or camp ground).
- I [and my children] am/are the victim(s) of domestic violence and am/are fleeing from abuse.
- I [and my children] am/are being evicted from the housing we are presently staying in and must leave this housing within the next ____ days.

I certify that the information above and any other information I have provided in applying for HPRP assistance is true, accurate and complete.

HPRP Applicant Signature: _____ Date: _____

HPRP Staff Certification

I understand that third-party verification is the preferred method of certifying homelessness or risk for homelessness for an individual who is applying for HPRP assistance. I understand self declaration is only permitted when I have attempted to but cannot obtain third party verification.

Documentation of attempt made for third-party verification:

HPRP Staff Signature: _____ Date: _____

Appendix 4

RENT REASONABLENESS CHECKLIST AND CERTIFICATION

	Proposed Unit	UNIT #1	UNIT #2	UNIT #3
ADDRESS				
NUMBER OF BEDROOMS				
SQUARE FEET				
TYPE OF UNIT/CONSTRUCTION				
HOUSING CONDITION				
LOCATION/ACCESSIBILITY				
AMENITIES				
UNIT:				
SITE:				
NEIGHBORHOOD:				
AGE IN YEARS				
UTILITIES (TYPE)				
UNIT RENT				
UTILITY ALLOWANCE				
GROSS RENT				
HANDICAP ACCESSIBLE?				

CERTIFICATION:

A. COMPLIANCE WITH PAYMENT STANDARD

PROPOSED CONTRACT RENT
 +

 UTILITY ALLOWANCE
 =

 PROPOSED GROSS RENT

APPROVED RENT DOES NOT EXCEED APPLICABLE PAYMENT STANDARD OF \$_____.

B. RENT REASONABLENESS

Based upon a comparison with rents for comparable units, I have determined that the proposed rent for the unit [] is [] is not reasonable.

NAME:	SIGNATURE:	DATE:
-------	------------	-------

Appendix 5

HPRP Unit Inspection Requirements

About this Tool

The standards for housing unit inspections under the Homelessness Prevention and Rapid Re-Housing Program (HPRP) are the housing habitability standards, described in Appendix C of the HPRP Notice. This resource is intended to provide grantees with a summary of HUD's policies related to habitability inspections.

Which units need an inspection?

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

Are habitability standards different from HUD's Housing Quality Standards?

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

Does a certified inspector need to conduct inspections?

No. Unlike HQS inspections, which must be conducted by a certified inspector, habitability standards do *not* require a certified inspector to conduct on-site inspections. For example, units assisted by HPRP may be inspected by:

- HPRP program staff;
- Staff from or hired by an agency of the grantee's local government; or
- Staff from another subsidy program providing assistance to the unit and also requiring an inspection (e.g., Section 8, HOPWA TBRA), as long as they follow the minimum habitability standards required by HPRP.

When do inspections need to be conducted?

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

How do I conduct on-site inspections?

Use the *HPRP Habitability Standards Checklist* (available on HUD's Homelessness Resource Exchange at <http://hudhre.info>) to guide you and/or other program staff conducting the on-site inspection. This checklist should be completed upon initial occupancy and on an annual basis for the term of HPRP assistance. Copies of the completed checklists should be included in program participant files for documentation purposes.

Can HPRP funds be used to pay for habitability inspections?

Yes, grantees may charge expenses associated with conducting habitability inspections under the Financial Assistance category.

Are the habitability inspections the same as the Lead-Based Paint inspections?

No. Under the Lead-Based Paint Poisoning Prevention Act of 1973, visual assessments for potential lead-based paint hazards must be conducted for all pre-1978 units in which a child under the age of six will be residing before financial assistance may be provided. Visual assessments must be conducted regardless of whether the program participant is receiving assistance to remain in an existing unit or moving to a new unit. Individuals can become a HUD-certified Visual Assessor by successfully completing the 20minute online training course on conducting visual assessments on HUD's website (available at: <http://www.hud.gov/offices/lead/training/visualassessment/h00101.htm>). Note that a HUD-certified Visual Assessor is not equivalent to a Certified Clearance Examiner, whose services may be needed if lead hazards are identified during the visual assessment.

Appendix 6

HPRP Housing Habitability Standards Inspection Checklist

About this Tool

The standards for housing unit inspections under HPRP are the housing habitability standards described in Appendix C of the HPRP Notice. These standards apply only when a program participant is receiving financial assistance and moving into a new (different) unit. Inspections must be conducted upon initial occupancy and then on an annual basis for the term of HPRP assistance.

The habitability standards are different from the Housing Quality Standards (HQS) used for other HUD programs. Because the HQS criteria are more stringent than the habitability standards, a grantee could use either standard. In contrast to HQS inspections, the habitability standards do not require a certified inspector. As such, HPRP program staff could conduct the inspections, using a form such as this one to document compliance.

Instructions: Mark each statement as 'A' for approved or 'D' for deficient. The property must meet all standards in order to be approved. A copy of this checklist should be placed in the client file.

Approved or Deficient	Element
	1. <i>Structure and materials:</i> The structures must be structurally sound so as not to pose any threat to the health and safety of the occupants and so as to protect the residents from hazards.
	2. <i>Access:</i> The housing must be accessible and capable of being utilized without unauthorized use of other private properties. Structures must provide alternate means of egress in case of fire.
	3. <i>Space and security:</i> Each resident must be afforded adequate space and security for themselves and their belongings. Each resident must be provided with an acceptable place to sleep.
	4. <i>Interior air quality:</i> Every room or space must be provided with natural or mechanical ventilation. Structures must be free of pollutants in the air at levels that threaten the health of residents.
	5. <i>Water Supply:</i> The water supply must be free from contamination.
	6. <i>Sanitary Facilities:</i> Residents must have access to sufficient sanitary facilities that are in proper operating condition, may be used in privacy, and are adequate for personal cleanliness and the disposal of human waste.
	7. <i>Thermal environment:</i> The housing must have adequate heating and/or cooling facilities in proper operating condition.
	8. <i>Illumination and electricity:</i> The housing must have adequate natural or artificial illumination to permit normal indoor activities and to support the health and safety of residents. Sufficient electrical sources must be provided to permit use of essential electrical appliances while assuring safety from fire.

	9. <i>Food preparation and refuse disposal:</i> All food preparation areas must contain suitable space and equipment to store, prepare, and serve food in a sanitary manner.
	10. <i>Sanitary condition:</i> The housing and any equipment must be maintained in sanitary condition.
	11. <i>Fire safety:</i> Both conditions below must be met to meet this standard. <ul style="list-style-type: none"> a. Each unit must include at least one battery-operated or hard-wired smoke detector, in proper working condition, on each occupied level of the unit. Smoke detectors must be located, to the extent practicable, in a hallway adjacent to a bedroom. If the unit is occupied by deaf or hard of hearing persons, smoke detectors must have an alarm system designed for hearing-impaired persons in each bedroom occupied by a for deaf or hard of hearing person. b. The public areas of all housing must be equipped with a sufficient number, but not less than one for each area, of battery-operated or hard-wired smoke detectors. Public areas include, but are not limited to, laundry rooms, day care centers, hallways, stairwells, and other common areas.

(Source: U.S. Department of Housing and Urban Development, Docket No. FR-5307-N-01, Notice of Allocations, Application Procedures, and Requirements for Homelessness Prevention and Rapid Re-Housing Grantees under the Recovery Act)

CERTIFICATION STATEMENT

I certify that I am not a HUD certified inspector and I have evaluated the property located at the address below to the best of my ability and find the following:

- Property meets all of the above standards.
- Property does not meet all of the above standards.

Therefore, I make the following determination:

- Property is approved.
- Property is not approved.

Case Name:			
Street Address:			
Apartment:	City:	State:	Zip:
Evaluator's Signature:	_____		Date:
Please Print. Name:			
CBO Exec. Dir. Initial:	_____		

Appendix 7

HOMELESSNESS PREVENTION AND RAPID RE-HOUSING PROGRAM

Homeless Prevention and Rapid Re-Housing Program (HPRP) VERIFICATION OF INCOME

HPRP Applicant Name: _____

Instructions for Employer/Payment Source Representative: This is to certify the income received by the above named individual for purposes of participating in the HPRP program. This information will be used only to determine the eligibility status and level of benefit of the household. **Complete only the selected section below that includes an authorization to release information.**

Please return this form to:

Name & Title: _____
Phone: _____ Fax: _____
Address: _____ Email: _____

Employment Income

HPRP Applicant Release: I hereby authorize the release of the following employment information.

HPRP Applicant Signature: _____ Date: _____

Employer representative to complete this section:

The person named above is employed by _____ since _____
_____. He/she is paid \$ _____ on a _____ basis and is currently working
an average of _____ hours per _____.

Additional compensation please specify (if any): _____

Probability of continued employment: _____

Authorized Employer Representative Signature: _____ Date: _____

Name, Title: _____

Address and Phone: _____

Payments and/or Benefit Income (complete one form for each distinct source of income for person named above)

CIRCLE ONE: Social Security/SSI Pension /Retirement TANF Public Assistance
Unemployment Compensation Workers Compensation Alimony Payments Foster Care Payments
Child Support Payments Armed Forces Income Other (pls. specify): _____

HPRP Applicant Release: I hereby authorize the release of the following payment and/or benefit information.

HPRP Applicant Signature: _____ Date: _____

Payment source representative to complete this section:

Payments or benefits in the amount of \$ _____ are paid on a _____
basis. The expected duration of the payments or benefits is _____.

Authorized Payment Source Representative Signature: _____ Date: _____

Name, Title: _____

Address and Phone: _____

Appendix 8

HOMELESSNESS PREVENTION AND RAPID RE-HOUSING PROGRAM

Homeless Prevention and Rapid Re-Housing Program (HPRP) SELF-DECLARATION OF INCOME

HPRP Applicant Name: _____

This is to certify the income status for the above named individual. Income includes but is not limited to:

- The full amount of gross income earned before taxes and deductions.
- The net income earned from the operation of a business, i.e., total revenue minus business operating expenses. This also includes any withdrawals of cash from the business or profession for your personal use.
- Monthly interest and dividend income credited to an applicant's bank account and available for use.
- The monthly payment amount received from Social Security, annuities, retirement funds, pensions, disability and other similar types of periodic payments.
- Any monthly payments in lieu of earnings, such as unemployment, disability compensation, SSI, SSDI, and worker's compensation.
- Monthly income from government agencies excluding amounts designated for shelter, and utilities, WIC, food stamps, and childcare.
- Alimony, child support and foster care payments received from organizations or from persons not residing in the dwelling.
- All basic pay, special day and allowances of a member of the Armed Forces excluding special pay for exposure to hostile fire.

Check only one box and complete only that section

I certify, under penalty of perjury, that I currently receive the following income:

Source: _____ Amount: _____ Frequency: _____

Source: _____ Amount: _____ Frequency: _____

Source: _____ Amount: _____ Frequency: _____

HPRP Applicant Signature: _____ Date: _____

I certify, under penalty of perjury, that I do not have any income from any source at this time.

HPRP Applicant Signature: _____ Date: _____

HPRP Staff Verification

I understand that third-party verification is the preferred method of certifying income for HPRP assistance. I understand self declaration is only permitted when I have attempted to but cannot obtain third party verification.

Documentation of attempt made for third-party verification:

Appendix 9

HOMELESSNESS PREVENTION AND RAPID RE-HOUSING PROGRAM

HPRP Lead Screening Worksheet

About this Tool

The *HPRP Lead Screening Worksheet* is intended to guide grantees through the lead-based paint inspection process to ensure compliance with the rule. HPRP staff can use this worksheet to document any exemptions that may apply, whether any potential hazards have been identified, and if safe work practices and clearance are required and used. A copy of the completed worksheet along with any additional documentation should be kept in each program participant's case file. Please see the *HPRP Lead-Based Paint Requirements Summary* for additional information.

Instructions

To prevent lead-poisoning in young children, HPRP grantees must comply with the Lead-Based Paint Poisoning Prevention Act of 1973 and its applicable regulations found at 24 CFR 35, Parts A, B, M, and R. Under certain circumstances, a visual assessment of the unit is not required. This screening worksheet will help program staff determine whether a unit is subject to a visual assessment, and if so, how to proceed. A copy of the completed worksheet along with any related documentation should be kept in each program participant's file.

Note: ALL pre-1978 properties are subject to the disclosure requirements outlined in 24 CFR 35, Part A, regardless of whether they are exempt from the visual assessment requirements.

Basic Information

Name of Participant
Address Unit Number
City State Zip
HPRP Program Staff

Part 1: Determine Whether the Unit is Subject to a Visual Assessment

If the answer to one or both of the following questions is 'no,' a visual assessment is not triggered for this unit and no further action is required at this time. Place this screening worksheet and related documentation in the program participant's file.

If the answer to both of these questions is 'yes,' then a visual assessment is triggered for this unit and program staff should continue to Part 2.

1. Was the leased property constructed before 1978?

Yes
 No

2. Will a child under the age of six be living in the unit occupied by the household receiving HPRP assistance?

Yes
 No

Part 2: Document Additional Exemptions

If the answer to any of the following questions is 'yes,' the property is exempt from the visual assessment requirement and no further action is needed at this point. Place this screening sheet and supporting documentation for each exemption in the program participant's file.

If the answer to all of these questions is 'no,' then continue to Part 3 to determine whether deteriorated paint is present.

1. Is it a zero-bedroom or SRO-sized unit?
 Yes
 No
2. Has X-ray or laboratory testing of all painted surfaces by certified personnel been conducted in accordance with HUD regulations and the unit is officially certified to not contain lead-based paint?
 Yes
 No
3. Has this property had all lead-based paint identified and removed in accordance with HUD regulations?
 Yes
 No
4. Is the client receiving Federal assistance from another program, where the unit has already undergone (and passed) a visual assessment within the past 12 months (e.g., if the client has a Section 8 voucher and is receiving HPRP assistance for a security deposit or arrears)?
 Yes (Obtain documentation for the case file.)
 No
5. Does the property meet any of the other exemptions described in 24 CFR Part 35.115(a).
 Yes
 No

Please describe the exemption and provide appropriate documentation of the exemption.

Part 3: Determine the Presence of Deteriorated Paint

To determine whether there are any identified problems with paint surfaces, program staff should conduct a visual assessment prior to providing HPRP financial assistance to the unit as outlined in the following training on HUD's website at:

<http://www.hud.gov/offices/lead/training/visualassessment/h00101.htm>.

If no problems with paint surfaces are identified during the visual assessment, then no further action is required at this time. Place this screening sheet and certification form (Attachment A) in the program participant's file.

If any problems with paint surfaces are identified during the visual assessment, then continue to Part 4 to determine whether safe work practices and clearance are required.

1. Has a visual assessment of the unit been conducted?
 Yes
 No
2. Were any problems with paint surfaces identified in the unit during the visual assessment?
 Yes
 No (Complete Attachment A – Lead-Based Paint Visual Assessment Certification Form)

Part 4: document the level of identified problems

All deteriorated paint identified during the visual assessment must be repaired prior to clearing the unit for assistance. However, if the area of paint to be stabilized exceeds the de minimus levels (defined below), the use of lead safe work practices and clearance is required.

If deteriorating paint exists but the area of paint to be stabilized does not exceed these levels, then the paint must be repaired prior to clearing the unit for assistance, but safe work practices and clearance are not required.

1. Does the area of paint to be stabilized exceed any of the de minimus levels below?

- 20 square feet on exterior surfaces Yes No
- 2 square feet in any one interior room or space Yes No
- 10 percent of the total surface area on an interior or exterior component with a small surface area, like window sills, baseboards, and trim Yes No

If *any* of the above are 'yes,' then safe work practices and clearance are required prior to clearing the unit for assistance.

Part 5: Confirm all identified deteriorated paint has been stabilized

Program staff should work with property owners/managers to ensure that all deteriorated paint identified during the visual assessment has been stabilized. If the area of paint to be stabilized does not exceed the de minimus level, safe work practices and a clearance exam are not required (though safe work practices are always recommended). In these cases, the HPRP program staff should confirm that the identified deteriorated paint has been repaired by conducting a follow-up assessment.

If the area of paint to be stabilized exceeds the de minimus level, program staff should ensure that the clearance inspection is conducted by an independent certified lead professional. A certified lead professional may go by various titles, including a certified paint inspector, risk assessor, or sampling/clearance technician. Note: the clearance inspection cannot be conducted by the same firm that is repairing the deteriorated paint.

1. Has a follow-up visual assessment of the unit been conducted?

- Yes
- No

2. Have all identified problems with the paint surfaces been repaired?

- Yes
- No

3. Were all identified problems with paint surfaces repaired using safe work practices?

- Yes
- No
- Not Applicable – The area of paint to be stabilized did not exceed the de minimus levels.

4. Was a clearance exam conducted by an independent, certified lead professional?

- Yes
- No
- Not Applicable – The area of paint to be stabilized did not exceed the de minimus levels.

5. Did the unit pass the clearance exam?

- Yes
- No
- Not Applicable – The area of paint to be stabilized did not exceed the de minimus levels.

Note: A copy of the clearance report should be placed in the program participant's file.

Appendix 10

HOMELESSNESS PREVENTION AND RAPID RE-HOUSING PROGRAM

Instructions for Residents Receiving HPRP Assistance

About this Tool

This tool provides residents with an overview of the Lead-Based Paint Poisoning Prevention Act, the responsibilities of property owners/managers, and their rights as tenants. Program staff should consider sharing this resource with program participants living in units constructed prior to 1978.

The purpose of this notice is to inform you that because your home was built prior to January 1978, it may contain lead-based paint. Lead from paint, paint chips, and dust can pose health hazards if not managed properly. Lead exposure is especially harmful to young children and pregnant women.

Your landlord should have already provided you with a pamphlet on lead poisoning prevention, as well as a disclosure form on the lead-based paint or lead-based paint hazards in your home. The attached handout - entitled *What Are the Sources of Lead in Your Home?* - provides important information. For additional information on lead-based paint and lead hazards, please call the National Lead Information Center at 1-800-424-LEAD or visit the web at:

- <http://www.hud.gov/offices/lead/index.cfm>; or
- <http://www.epa.gov/lead/>

Regulations under The Lead Safe Housing Rule helps to ensure that your home is safe for occupancy. In order for you to help keep your home safe, please notify the management if you see any paint that is chipping, peeling, flaking, or otherwise damaged.

The bottom of this page can be detached and submitted to the management to bring attention to any lead-based paint concerns.

Lead-Based Paint Concern

To _____
(Landlord/Property Management Company)

I am submitting this notice because I have observed the following:

Paint in bad condition (chipping, peeling, flaking, etc.)

Other _____

Location of Paint Concern:

Exterior (location):

Interior (location):

Name: _____

Address: _____

Date: _____

What are the Sources of Lead in Your Home?

There are four major sources of lead that can pose a health hazard to people in and around the home. The sources are:

1. **Lead-based paint.** Lead-based paint can be found in housing built prior to 1978. It can be a hazard, especially if it deteriorates or if it is disturbed during maintenance or through normal wear and tear. If lead-based paint is peeling, chipping, chalking, or cracking, it will create lead-contaminated dust that poisons children through normal hand-to-mouth activity. Children may also eat paint chips or chew on painted surfaces that are accessible to them, resulting in poisoning. Even lead-based paint that appears to be in good condition can be a problem if it is on surfaces that get a lot of wear and tear, such as door jambs and window tracks. It is important to remove the causes of deteriorating paint such as water leaks. Lead paint that is deteriorating can be repaired by repainting with a good latex paint or lead sealer.
2. **Lead-contaminated dust.** Lead-contaminated dust is created when lead-based paint is sanded or scraped during maintenance or repair, or just through every day wear and tear. When maintenance or renovations take place, the dust from these operations settles on surfaces such as floors, countertops, window-sills, and furniture. If the paint being worked on contains lead, the lead is deposited on surfaces as dust. Window tracks and door jambs can be another source of lead-contaminated dust. If these components rub during normal opening and closing, lead-contaminated dust can be created and deposited on surfaces throughout the home. Lead from work done on house exteriors can be tracked into the home, becoming an additional source of lead dust. After routine home maintenance or remodeling/renovation and painting, the home should be thoroughly cleaned to remove any dust that may be left behind because it may contain lead. Lead dust sampling should then be performed to verify that the cleaning was effective.
3. **Lead-contaminated soil.** Soil can become contaminated when exterior lead-based paint deteriorates and gets in the soil. Homes near certain industries such as smelters or battery manufacturers may have lead into the soil as a result of these operations. Past use of leaded gasoline has also left lead deposits in our nation's soil. Playgrounds and gardens should not be placed in areas where the soil is contaminated with lead. Soil can be tracked into the home so it is important for workers to clean shoes or remove them before entering the home.
4. **Lead-contaminated drinking water.** Drinking water can be contaminated with lead, regardless of the water's source. Many faucets in homes and on store shelves contain leaded components that can leach lead into the water. Leaded solder in household piping and leaded components in well pumps have been in use for many years, and continue to leach lead into the drinking water of thousands of homes even today. Many public water delivery systems still have old lead piping through which the water must pass before it reaches the home. Water with a high pH has a tendency to leach more lead than water with a neutral pH, and warm water leaches more lead than cold. Allow cold water to run before drinking.

The following are sources of information about lead-based paint in your home:

- [National Lead Information Center](#) (NLIC) is a clearinghouse for information on lead that provides copies of pamphlets, reports, and other resources. (1-800-424-LEAD)
- [Safe Drinking Water Hotline](#) provides information and assistance to the public on safe drinking water. (1-800-426-4791)

Appendix 11

Instructions for Property Owners with Tenants Receiving HPRP Assistance

About this Tool

This tool summarizes and outlines responsibilities of property owners/managers under Lead-Based Paint Poisoning Prevention Act of 1973 (24 CFR 35). Program staff should consider sharing this tool with property owners/managers to inform them of their responsibilities.

Lead-based paint remains a serious threat to children's health and well-being. Consider the following facts:

- An estimated 890,000 U.S. children have too much lead in their bodies.
- Nationwide, an estimated 38 million homes have lead-based paint.
- The most common sources of lead hazards are generated in a residential environment.

To better protect young children from the dangers of lead-based paint in their homes, the Department of Housing and Urban Development (HUD) has issued The Lead Safe Housing Rule (24 CFR 35). Under the new Homelessness Prevention and Rapid Re-Housing Program (funded under the American Recovery and Reinvestment Act of 2009), grantees administering HPRP financial assistance must comply with the Lead Safe Housing Rule. HPRP financial assistance includes short- and medium-term rental assistance, as well as one-time rent payments, rental and utility arrears payments, security deposits, utility deposits, and utility assistance. The rule applies to all units built before January 1978 in which children under the age of six years will be living in the next 12 months.

The Lead Safe Housing Rule affects HPRP grantees and landlords in the following ways:

- The HPRP grantee must conduct a visual assessment before assistance can be approved and annually thereafter during the period of assistance.
- All painted surfaces, interior and exterior, must be inspected for deteriorated paint (not just those surfaces within reach of a child).
- If deteriorated paint is identified, the paint must be stabilized. If the area of paint to be stabilized exceeds the "de minimus" level,¹ paint stabilization must be done by qualified workers using safe work practices. See Attachment 1. Note that HPRP funds cannot be used for stabilization activities.
- Once work on the defective paint surface is completed and the surrounding area cleaned, a certified lead professional must conduct a clearance examination (if the area of deteriorated paint exceeded the de minimus level).² If the area of deteriorated paint did not exceed the de minimus level, the grantee will conduct a follow-up visual assessment. Note: The grantee and landlord should coordinate to identify a certified lead professional and schedule the examination.³

¹ Safe work practices and clearance are not required when maintenance or hazard reduction activities do not disturb painted surfaces below the de minimis thresholds defined below:

- 20 square feet (2 square meters) on exterior surfaces;
- 2 square feet (0.2 square meters) in any one interior room or space; or
- 10 percent of the total surface area on an interior or exterior type of component with a small surface area (such as window sills, baseboards, and trim).

² A certified lead professional may go by various titles, including a certified paint inspector, risk assessor, or sampling/clearance technician.

³ To locate a certified lead professional in your area: (1) Call your state government (health department, lead poison prevention program, or housing authority). (2) Call the National Lead Information Center at 1-800-424-LEAD (5323). (3) Go to the US Environmental Protection Agency website at <http://cfpub.epa.gov/flpp/> and click on "certified abatement/inspection firms."

- The [HPRP grantee (or) landlord] will pay for the first clearance examination.⁴
- If a unit fails the clearance examination, the landlord is responsible for re-cleaning the unit and hiring a certified clearance examiner to perform a second clearance.
- No HPRP assistance can be provided until the unit passes the follow-up visual assessment or clearance exam, as appropriate.
- After work is complete, the landlord must provide a *Notice of Lead Hazard Reduction* to the resident. See Attachment 2.
- The HPRP grantee will conduct an annual re-inspection for deteriorated paint throughout the course of the HPRP assistance.
- As long as HPRP assistance continues, the landlord is required to stabilize any deteriorated paint in a lead-safe manner. See Attachment 3.

The following resources are provided to help you implement these requirements:

- Attachment 1: Instructions on how to stabilize paint
- Attachment 2: Sample Notice of Lead Hazard Reduction
- Attachment 3: Instructions for Ongoing Maintenance

The HPRP grantee will work with landlords to facilitate compliance. For more information, please contact

_____ at _____.
 Staff name Telephone Number

Attachment 1: Paint Stabilization Instructions

Repairing, removing, or maintaining lead-based paint improperly can spread lead-contaminated dust throughout the home. It is very important to use safe work methods when working on surfaces that may contain lead-based paint.

1. **Use qualified workers.** In homes receiving HUD assistance and where deteriorated paint exceeds the de minimis thresholds defined in Attachment 3, **paint stabilization must be done by workers who are specially trained in lead safe work practices.** Alternatively, the workers may be supervised by a state-certified abatement supervisor. The HPRP grantee can help you identify properly trained contractors. Note, the use of qualified workers is not required when maintenance or hazard reduction activities do not disturb painted surfaces below the de minimis thresholds, though use of lead-safe work practices is always recommended.
2. **Use the proper equipment.** You will need the proper tools and supplies to do the job correctly. In addition to tools such as scrapers and putty knives, it is important to have: A HEPA vacuum (a vacuum equipped with a very fine filter capable of filtering very small particles of lead); double-sided mop bucket and mop; a good household detergent; ample disposable paper towels or rags; plastic sheeting; tack cloth; disposal waste bags; wet sanding blocks; and misting bottle filled with water.
3. **Set up the work area properly.** The key is to contain the dust and debris created by the work. Create a barrier between the work area and the rest of the house. Use plastic sheeting over the doorways to seal off the area and protect the rest of the house from exposure. Work over a plastic drop cloth (never use cloth) to catch any debris created as a result of paint removal. Wear disposable shoe covers and remove them before exiting the work area, or step onto a tack cloth to remove paint chips and dust from the soles of shoes. Keep doors and windows closed to prevent dust from blowing and close off vents to central air or heating systems to avoid spreading dust to other parts of the house. Remove all furniture, or cover tightly with plastic sheeting. Do not allow children or pregnant women into the work area.

⁴ Note to grantees: HPRP funds cannot be used for lead-based paint stabilization and clean-up work, however funds can be used to pay for one clearance examination. It is up to the grantee to decide if they wish to use funds for the exam. Based on their local decision, grantees should circle the appropriate response prior to providing this guidance to landlords.

4. **Use safe work practices.** If the deteriorated paint surfaces exceed the de minimus thresholds defined in Attachment 3, then safe work practices must be used. Never remove lead-based paint by dry-sanding, dry scraping or burning. Use power sanders, grinders, and planers only with a HEPA exhaust attachment. Using your misting bottle, wet the painted surface before sanding with a wet sanding block or scraping. Be sure to work over a plastic drop cloth to catch any large particles. Do not eat, smoke, or chew gum while working. Note: Safe work practices are not required when maintenance or hazard reduction activities do not disturb painted surfaces below the de minimis thresholds.
5. **Clean as you work.** Be sure to wet clean the areas you are working on as you go along. Though it will be necessary to clean the entire house at the end of the project, it is important to clean as you work in order to keep lead-contaminated dust from spreading. Clean using a good household detergent. Rinse your cleaning utensils in clean water.
6. **Dispose of waste properly.** When the work is done, mist the plastic sheeting with water to keep down the dust. Roll the plastic sheet up, keeping the dirty side in. Pick up any paint chips or other debris that may have fallen elsewhere. Be sure to place all disposable items used in the repair and clean up into plastic waste bags. The bags must be tightly sealed and can generally be disposed of with the household trash.* Once the bags are sealed, do not reopen them.
7. **Obtain clearance.** If the deteriorated paint surfaces exceed the de minimus thresholds defined in Attachment 3, then clearance must be obtained after the paint has been stabilized and the work area cleaned. The results of this test will tell you if your work practices and final cleaning have been effective at removing lead-contaminated dust. Clearance is not required when maintenance or hazard reduction activities do not disturb painted surfaces below the de minimis thresholds.

*Check with your State lead program to ensure there is no state regulation prohibiting disposal with household trash.

Attachment 2: Sample Notice of Lead Hazard Reduction

Property Address: _____

Today's Date: _____

Summary of the Hazard Reduction Activity:

Start Date: _____

Completion Date: _____

Location and type of activity. (List the location and type of activity conducted, or attach a copy of the summary page from the clearance report providing this information.)

Date(s) of clearance testing: _____

Summary of results of clearance testing:

- (a) _____ Clearance testing was not performed as paint stabilization did not exceed de minimus levels.
- (b) _____ Clearance testing showed clearance was achieved.
- (c) _____ Clearance testing showed clearance was not achieved.

List any components (e.g., kitchen-door, bedroom-windows) with known lead-based paint that remain in areas where activities were conducted.

Person who prepared this summary notice

Printed Name: _____ Signature: _____
Title: _____ Organization: _____
Address: _____
Phone: _____ Fax: _____
Owner: _____ Date: _____
(Give to Property Owner with work write-up)

If you have any questions about this summary, please contact _____ at _____.

Attachment 3: Ongoing Monitoring and Maintenance Requirements

Property owners/landlords should take the following steps to ensure that paint is not deteriorating and creating lead-contaminated dust and paint chips, as it will help prevent children from being lead poisoned.

1. Regularly Check Repairs for Deterioration, Paint Chips, and Dust

Property owners must monitor painted surfaces at least annually and at unit turnover. Check to see if:

- New evidence of deterioration or paint failure is present.
- The cause of the problem was corrected.

2. Maintain Surfaces and Work Safely

- Stabilize deteriorated paint;
- Use safe work practices and qualified workers for all maintenance activities;**

3. Conduct Clean-Up and Clearance Activities

- Clean thoroughly after all maintenance work;
- Seek clearance of the work area using a certified lead professional (risk assessor, clearance examiner, or lead sampling technician);**
- If the work area does not pass clearance, re-clean and perform clearance again.

**** Note** – Safe work practices and clearance are not required when maintenance or hazard reduction activities do not disturb painted surfaces below the de minimis thresholds defined below:

- 20 square feet (2 square meters) on exterior surfaces;
- 2 square feet (0.2 square meters) in any one interior room or space; or
- 10 percent of the total surface area on an interior or exterior type of component with a small surface area (such as window sills, baseboards, and trim).

Appendix 12

HPRP Lead-Based Paint Property Owner Certification Form

About this Tool

The *HPRP Lead-Based Paint Property Owner Certification Form* is a tool program staff can use to have property owners/managers certify that all paint stabilization activities have been completed in accordance with guidelines when formal clearance is not required (or as additional documentation when formal clearance *is* required). A copy of the completed form along with any additional documentation (i.e., a copy of the clearance report) should be kept in each program participant's file.

Instructions

To prevent lead-poisoning in young children, the HPRP program must comply with the Lead-Based Paint Poisoning Prevention Act of 1973 and its applicable regulations found at 24 CFR 35, Parts A, B, M, and R. If a visual assessment reveals problems with paint surfaces, property owners/managers must repair all identified problems with paint surfaces in accordance with the guidelines of 24 CFR 35, Parts A, B, M, and R, prior to a unit receiving HPRP assistance. Property owners/managers should complete this form to certify that all identified problems with paint surfaces have been repaired/stabilized in accordance with the guidelines.

1. Have all identified problems with the paint surfaces been repaired?
 Yes
 No
2. Have all identified problems with paint surfaces been repaired using safe work practices?
 Yes
 No
 Not Applicable – The area of paint to be stabilized did not exceed the de minimus levels.
3. Was a clearance exam conducted by an independent, certified lead professional?
 Yes
 No
 Not Applicable – The area of paint to be stabilized did not exceed the de minimus levels.
4. Did the unit pass the clearance exam?
 Yes
 No
 Not Applicable – The area of paint to be stabilized did not exceed the de minimus levels.

Name of Tenant

Address Unit Number

City State Zip

Name of Property Owner/Manager

Property Owner/Manager Signature _____ Date

Name HPRP Program Staff

HPRP Program Staff Signature _____ Date

Appendix 13

HPRP Lead-Based Paint Document Checklist

About this Tool

The following checklist provides HPRP grantees with an overview of common documents that can be used to verify compliance with the Lead-Based Paint Poisoning Prevention Act. Note that this checklist does not cover all of the documentation that providers would want to include in all instances. For example, additional documentation may be required if the property is found to meet exemptions listed under Part 2 of the Lead Screening Worksheet.

Document Name	Purpose	✓
Application	Documents age of children	
Screenshot of property record from online tax database	Documents age of property	
Lead Screening Worksheet	Documents exemptions (additional documentation will vary based on exemption)	
Lead-Based Paint Visual Assessment Certification	Documents that a visual assessment was conducted and problems with paint surfaces were not identified	
Owner Certification (if applicable)	Documents owner certification that any identified problems with paint surfaces have been repaired and that safe work practices were followed, as applicable	
Clearance Report (if applicable)	Documents that unit passed clearance	
Documentation of ongoing maintenance activities: <ul style="list-style-type: none"> • Visual Assessment Certification Forms • Clearance report from each maintenance job involving painted surfaces above the de minimis threshold • Notice of lead hazard reduction for each maintenance job involving painted surfaces 	Documents that a visual assessment is performed at least annually during the assistance period and that any deteriorated paint was appropriately addressed (including clearance and notice of lead hazard reduction)	
Documentation of response to EIBLL child: <ul style="list-style-type: none"> • Copies of risk assessment • Abatement or clearance report • Relocation documents • Correspondence with health department 	Documents that if an EIBLL child was identified in the unit, the situation was addressed in accordance with the Lead Safe Housing Rule.	

Appendix 14 - Utah HPRP Monitoring Review

Project monitoring is an ongoing process of reviewing a sub grantee's performance in meeting goals, identifying program deficiencies, and enhancing capacity through technical assistance or other corrective actions.

Subgrantee

Organization:

Address:

Phone:

Email:

Who is in charge of the day-to-day administration of the program?

Name:

Phone:

Email:

Monitor(s)		Person(s) Interviewed	
Contract Number	Award Amount	Grant begin date	Grant end date

See Attachments: Contract Attachment D – Scope of Work
Most recent WebGrants draw-down record

Last Review/date

Summary of Findings/Concerns / Good Practices:

Current Review/date

Summary of Findings/Concerns/ Good Practices:

Finding's Letter Mailed

Response from Agency/date

Response is accepted as submitted

Yes No

Monitor(s) Signature:

Date:

Utah HPRP Monitoring Review

MONITORING FORM TABLE OF CONTENTS	
SUBJECT	PAGE
1. Project Progress	61
2. Project Policies and Procedures	61
3. Evidence of Financial Management	62
3a. Reimbursements	62
3b. Security	63
3c. Audits	63
3d. Personnel and Costs Allocations	63
3e. Eligible Costs	64
3f. Internal Controls and Documentation	65
4. HMIS Agency Standards	67
5. HPRP Agency Standards	67
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1. PROJECT PROGRESS

i. Is the subgrantee submitting reimbursement request at least quarterly? Is the rate of draw downs consistent with the point-in-time expenditures for the grant term according to their project projections? HUD Reg II B 2	Yes <input type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/>
--	--

ii. Has the subgrantee remained consistent in number of households served, according to their project projections?	Yes <input type="checkbox"/> No <input type="checkbox"/>
--	--

Further Information:

2. PROJECT POLICIES AND PROCEDURES:

i. Does the subgrantee have an Operating Policies and Procedures Manual ? Does the subgrantee have and Accounting Policies and Procedures Manual H-8-6-1	Yes <input type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/>
---	--

ii. Does the subgrantee have an Eligibility policy , including provisions for ineligible clients?	Yes <input type="checkbox"/> No <input type="checkbox"/>
--	--

iii. Is there evidence that there are procedures in place for ensuring compliance with agency HPRP Confidentiality Policy , safeguarding information and records? (HUD Reg V (D))	Yes <input type="checkbox"/> No <input type="checkbox"/>
--	--

iv. Does the subgrantee have a Terminations policy , including due process and an appeals procedure? (HUD Reg V (E)) H-8-2-3	Yes <input type="checkbox"/> No <input type="checkbox"/>
---	--

v. Does the subgrantee have a Complaints policy , including an Appeals Procedure?	Yes <input type="checkbox"/> No <input type="checkbox"/>
--	--

vi. Does the subgrantee have an Equal Opportunities policy , which includes provisions under the Fair Housing Act? (HUD Reg VII (E))	Yes <input type="checkbox"/> No <input type="checkbox"/>
---	--

Utah HPRP Monitoring Review

vii. Does the subgrantee have a procedure to approve housing that includes: 1) Lead Based Paint Visual Assessments, 2) Habitability Standards, and 3) Rent Reasonableness?	Yes <input type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/>
--	--

viii. Does the subgrantee have a Drug Free Workplace policy? (HUD Reg VII (J)) If the requirements of their policy were monitored, would they be in compliance?	Yes <input type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/>
---	--

ix. Is the subgrantee a religious organization , and if so, does it offer all HPRP services, regardless of religion or religious belief? (HUD Reg VII (H))	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
---	---

x. Does the subgrantee conduct lobbying ? If "Yes", have they correctly filed a certification and disclosure form? H-8-9-3	Yes <input type="checkbox"/> No <input type="checkbox"/>
---	--

xi. Is the subgrantee compliant with Non-Discrimination , Section 504 of the Rehabilitation Act of 1973, and other equal opportunity requirements? H-8-9-4	Yes <input type="checkbox"/> No <input type="checkbox"/>
--	--

xii. Are procedures in place to ensure subgrantee is in compliance with conflict of interest requirements? H-8-6-4	Yes <input type="checkbox"/> No <input type="checkbox"/>
--	--

Further Information:

3. EVIDENCE OF ADEQUATE FINANCIAL MANAGEMENT SYSTEMS

3a. REIMBURSEMENTS

i. Does the subgrantee have a written procedure on how to submit requests for reimbursement?	Yes <input type="checkbox"/> No <input type="checkbox"/>
--	--

Describe Basis for Conclusion:

ii. Does the subgrantee have original invoices and canceled checks on file for expenses submitted for reimbursement?	Yes <input type="checkbox"/> No <input type="checkbox"/>
--	--

Describe Basis for Conclusion:

iii. Is there a system for tracking payables to assure that reimbursements are not duplicated?	Yes <input type="checkbox"/> No <input type="checkbox"/>
--	--

Describe Basis for Conclusion:

Utah HPRP Monitoring Review

3b. SECURITY

i. Does subgrantee store all HPRP documents in a secure area?	Yes <input type="checkbox"/> No <input type="checkbox"/>
Describe Basis for Conclusion:	

ii. Are fiscal records and valuables secured in a limited-access area? H-8-7-5	Yes <input type="checkbox"/> No <input type="checkbox"/>
Describe Basis for Conclusion:	

3c. AUDITS

i. Are OMB Circular A-133 Single Audits required for this subgrantee? H-8-7-18a	Yes <input type="checkbox"/> No <input type="checkbox"/>
Describe Basis for Conclusion:	

ii. If "Yes" to above, does the subgrantee have a system or methodology to ensure that such audits are conducted? H-8-7-18b	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
Describe Basis for Conclusion:	

iii. If Audit is required, has it been completed? If "Yes", has Audit been submitted to Grantee with documentation that Audit has been reviewed for compliance with OMB Circular A-133, and that appropriate follow-up actions have been taken, if necessary? H-8-7-18c	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
Describe Basis for Conclusion:	

3d. PERSONNEL COSTS AND ALLOCATION

i. Subgrantee is justifying how expenses are divided between activities for staff.	Yes <input type="checkbox"/> No <input type="checkbox"/>
Describe Basis for Conclusion:	

ii. Do costs reveal that staff paid with HPRP funds are working on HPRP activities? H-8-6-3	Yes <input type="checkbox"/> No <input type="checkbox"/>
Describe Basis for Conclusion:	

Utah HPRP Monitoring Review

iii. Based on documentation, do charges for salaries and wages appear allowable? H-8-7-12	Yes <input type="checkbox"/> No <input type="checkbox"/>
--	--

Describe Basis for Conclusion:

iv. Do administrative job descriptions reflect eligible administration costs? H-8-6-2	Yes <input type="checkbox"/> No <input type="checkbox"/>
--	--

Describe Basis for Conclusion:

v.. Is the Supervisor signature on employee time-sheets? H-8-7-12b	Yes <input type="checkbox"/> No <input type="checkbox"/>
---	--

Describe Basis for Conclusion:

vi. Do employee time-sheets indicate actual times, and not percentages? H-8-7-13	Yes <input type="checkbox"/> No <input type="checkbox"/>
---	--

Describe Basis for Conclusion:

vii. If employee is being paid from more than one source, is this indicated on time-sheet? If employee is being paid from more than one source, is this indicated in the accounting records? H-8-7-14	Yes <input type="checkbox"/> No <input type="checkbox"/>
---	--

Describe Basis for Conclusion:

viii. Do employee time-sheets indicate that costs for financial assistance and services were allocated to those activity types and not to the administration budget line item? H-8-6-9	Yes <input type="checkbox"/> No <input type="checkbox"/>
---	--

Describe Basis for Conclusion:

3e. ELIGIBLE COSTS

i. Does review of sample transactions indicate that expenditures were eligible costs? H-8-7-9, H-8-8-2,	Yes <input type="checkbox"/> No <input type="checkbox"/>
--	--

Describe Basis for Conclusion:

ii. Do files indicate absence of unallowable costs: entertainment, contributions, donations, fines, penalties, or costs including salary and expenses of Chief Executive Officer of the grantee? H-8-8-3, H-8-7-16	Yes <input type="checkbox"/> No <input type="checkbox"/>
--	--

Describe Basis for Conclusion:

Utah HPRP Monitoring Review

iii. Does documentation indicate disbursements are only for activities eligible under financial assistance, housing relocation and stabilization services, data collection and evaluation, and administrative costs? H-8-6-5

Yes No

Describe Basis for Conclusion:

iv. Do records identify eligible Scope-of-Work expenditure activities? H-8-7-7

Yes No

Describe Basis for Conclusion:

3f. INTERNAL CONTROLS AND DOCUMENTATION

i. Is subgrantee keeping a master spreadsheet to maintain cumulative months served per each client (or other applicable record keeping database)

Yes No

Describe Basis for Conclusion:

ii. Subgrantee has adequate
 1) written policies covering recording of transactions,
 2) an accounting manual, and
 3) a chart of accounts H-8-7-1

Yes No
 Yes No
 Yes No

Describe Basis for Conclusion:

iii. Subgrantee's reconciliation of Bank Statements is current.

Yes No

Describe Basis for Conclusion:

iv. Do records indicate effective internal control/accountability of grant funds, property and other assets? H-8-7-8

Yes No

Describe Basis for Conclusion:

v. Are transactions supported by adequate documentation (e.g. invoices, contracts, purchase orders, etc.) H-8-7-10

Yes No

Describe Basis for Conclusion:

Utah HPRP Monitoring Review

vi. Are there internal controls in place, such as segregation of duties that effectively reduce the chance to conceal errors or commit fraud?
H-8-7-11

Yes No

Describe Basis for Conclusion:

vii. Do financial records show no cash payments were made directly to program participants, but to 3rd parties only?
H-8-7-15

Yes No

Describe Basis for Conclusion:

viii. Are there written procedures covering authority for approving financial transactions?
H-8-7-2

Yes No

Describe Basis for Conclusion:

ix. Are there written guidelines for controlling expenditures (e.g. purchasing requirements, travel authorizations)
H-8-7-3

Yes No

Describe Basis for Conclusion:

x. Are there written procedures regarding the maintenance of financial records?
H-8-7-4

Yes No

Describe Basis for Conclusion:

Further Information:

Utah HPRP Monitoring Review

4. HMIS AGENCY STANDARDS (DESKTOP OR ON SITE REVIEW)

i. Is there a list of active authorized/certified HMIS users?	Yes <input type="checkbox"/> No <input type="checkbox"/>
ii. Do HMIS users have access to adequate computer technology and tools, such as internet access, printers, data analysis software, etc.?	Yes <input type="checkbox"/> No <input type="checkbox"/>
iii. Do computers used to access the HMIS have a locking screen saver?	Yes <input type="checkbox"/> No <input type="checkbox"/>
iv. Does the subgrantee have a privacy policy?	Yes <input type="checkbox"/> No <input type="checkbox"/>
v. Is the privacy policy posted; either in office or on website?	Yes <input type="checkbox"/> No <input type="checkbox"/>
vi. Is there a Release of information on file for clients entered in HMIS?	Yes <input type="checkbox"/> No <input type="checkbox"/>
vii. Is there a Refusal of Authorization on file for anyone not entered into HMIS?	Yes <input type="checkbox"/> No <input type="checkbox"/>
viii. Does agency reconcile their client records with HMIS at least monthly?	Yes <input type="checkbox"/> No <input type="checkbox"/>

Further Information:

5. HPRP AGENCY STANDARDS

i. How often are there staff meetings to discuss client progress/agency issues?	
ii. Does the subgrantee have an updated Resource Directory?	Yes <input type="checkbox"/> No <input type="checkbox"/>
iii. How long after intake or discharge does it take to enter client information into HMIS?	__ __ days

Further Information:

Appendix 14 - Utah HPRP Monitoring Review

HPRP FILE REVIEW WORKSHEET	File #1	File #2	File #3
Initials and Start Date			
ASSISTED HOUSING - 8-2			
Rent Reasonableness 1) Amount paid does not exceed actual rent cost? 2) Rent compared to non-assisted units			
Habitability Inspection (Re-housing, then annually) 1) Inspected prior to occupancy? 2) Habitability standards met? 3) Date, staff signed			
*Lead-Based Paint 1) If applies, visual assessment date 2) If LBP identified, were proper regulations followed? 2) Staff Visual Assessor Certification in staff file?			
FINANCIAL ASSISTANCE & HRSS - 8-3			
Financial Assistance Provided - Limited (dates) 1) Rental – maximum. 18 months 2) Utilities – maximum 18 months 3) Supportive services – maximum 18 mos. 4) Rental/utility arrears – max. 6 mon. each 5) Arrears included in 18 mon. max			
Participant eligibility certified every 3 months (dates)			
Files reflect eligible financial assistance & supportive services			
Motel/Hotel Vouchers 1) documents lack of shelter beds 2) housing identified prior to voucher 3) voucher did not exceed 30 days			
Moving/Storage Costs 1) Costs reasonable – vendor comparison 2) Storage – maximum 3 months			
Legal Services HP or RRH, not mortgage-related issues			

Utah HPRP Monitoring Review

HPRP FILE REVIEW WORKSHEET	File #1	File #2	File #3
No other assistance provided for same cost type/time frame as HPRP (by Fed, State, Local Program)			
No Transitional Housing Assistance evidence in files (DWS, Sec. 8, HMIS)			
PROGRAM PARTICIPANTS DOCUMENTATION - 8-4			
Initial Assessment & Case Mgmt. Meeting 1) Adequate documentation 2) (Date, Staff)			
Income Eligible & Verification (≤ 50 pct of Area Median Income) – adequate documentation			
Prevention 1) No other appropriate housing options 2) No other financial resources/support networks			
Rapid Re-Housing 1) Homeless per HUD definition 2) No other appropriate housing options 3) No other financial resources/support networks			
* Client Proof of Responsibility (Utility bill, legal lease, etc.)			
*Does client have updated income section?			
*Are there defined household goals with regular updates?			
Termination Policy H-8-2-3/4 If terminated, was minimum due process followed?			
HOUSING PROGRAM – 8-5			
Data Privacy Notice & ROI date(s)			
OVERALL GRANT MANAGEMENT - 8-6			
*Staff Affidavit 1) In file? Date. 2) Re-Certification date(s)			
* Case Notes Evidence of supportive services			

* Indicates Grantee question