

HPRP Application Questions

Are these funds on a reimbursement basis only? Some of the cities are providing a small amount for start-up funds and others are reimbursement. With the difficult economic times for nonprofits, it is hard to float that kind of money.

Under the HUD published notice for HPRP funds, grantees and sub-grantees may be paid in advance pursuant to procedures outlined in 24 CFR 84.22 for non-profit organizations and 24 CFR 85.21 for units of local government. The City of Santa Ana will **not** be adopting this policy. HUD has determined HPRP to be a “high risk” program and will be under close scrutiny. In consideration of this information, the City will use the payment policy established under the City’s CDBG program in order to review all costs prior to the release of HPRP funds to the sub-grantee. Under CDBG, payments to sub-grantees are reimbursement only and are processed quarterly. The City understands that floating funds in this economic environment is difficult and quarterly reimbursements may be challenging. Therefore the City will most likely modify the policy to allow for more frequent reimbursement requests.

Can we use this funding to assist chronically homeless clients who are currently in our program to obtain permanent housing? Or is it only intended for those who have recently become homeless due to the economic downturn?

Funding is not just for individuals who have been affected by the economic downturn. HUD has published the following guidance. The purpose of HPRP rapid re-housing funds is to assist eligible program participants to quickly obtain and **sustain** stable housing. Therefore, organizations providing assistance should utilize a process to assess, for all potential program participants, their level of service need, other resources available to them, and the appropriateness of their participation in the rapid re-housing assistance portion of HPRP. Program participants who require longer-term housing assistance and services should be directed to programs that can provide the requisite services and financial assistance.

You state: Please bind the original HPRP Program Checklist and Application and clip all attachments to the original. What do you mean by bind?

The purpose of binding the original is to insure that no pages are lost and that we receive your complete application. Binding can be accomplished by inserting the original into a project folder, stapling together, or any other way where pages cannot be easily removed or lost.

Do you have to be located in the City of Santa Ana to apply?

No. We require that your agency have an office located in the County of Orange. It is important to note that Santa Ana HPRP funds may only be used to assist Santa Ana residents, so you will need to have a process in place to determine last documented permanent city residency.

Can you detail what you mean by “participate in certain requirements on disclosure of lead based paint hazards?”

Rental assistance and security deposits for families with a child under the age of six will trigger the Lead-Based Paint Requirement. Inspections are required any time a participant moves into housing with HPRP funding. Inspections are not required where clients are staying in their current housing.

The Lead-Based Paint requirements are more stringent than the habitability standards, and they apply to all housing in which families assisted with HPRP funds will reside, whether they are assisted with homelessness prevention or rapid re-housing. Specifically, the regulations apply to the unit and to common areas servicing the unit when HPRP assistance is provided to a unit constructed before 1978 in which a child under the age of 6 will be residing, unless it meets one of the following criteria: a) it is a zero-bedroom or SRO-sized unit, b) it is housing for the elderly and there are no children under the age of 6, c) a lead-based paint inspection has been conducted in accordance with HUD regulations and found not to have lead-based paint, d) the property has had all lead-based paint identified and removed in accordance with HUD regulations or e) it meets any of the other exemptions described in 24 CFR part 35.115(a).

An initial visual assessment and periodic inspections are required for as long as HPRP funds are being used to assist the family in the unit. Both must meet HUD's standards described in the applicable regulations. In addition, the unit must be inspected again if a new family assisted with HPRP funds moves in, and the clock for periodic inspections is reset. Finally, the owner must provide a notice to occupants if an evaluation and hazard reduction activities have taken place, in accordance with 24 CFR part 35.125.

Please carefully read the regulations that implement the Lead-Based Paint Poisoning Prevention Act, at 24 CFR part 35, subparts A, B, M, and R.

http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr&tpl=/ecfrbrowse/Title24/24cfr35_main_02.tpl

Eligible funds for financial assistance include motel and hotel vouchers. Are funds for vouchers only to be used to help for the few days when a client is homeless but will be placed in permanent housing within a few days or, for this grant, are motels considered permanent housing?

The Notice states, “HPRP funds may be used for reasonable and appropriate motel and hotel vouchers for up to 30 days if no appropriate shelter beds are available and subsequent rental housing has been identified but is not immediately available for move-in by the program participants.” So, a hotel/motel voucher can only be used when a unit has been identified and no shelter beds are available. Because it could take a few weeks to locate suitable rental housing, it would be advisable for grantees to try to identify an alternate source of funding for emergency housing to assist households in-between the time of program entry and the identification of housing if the community’s shelters are at capacity.

In the RFP, the Certification of Consistency with the Consolidated Plan, asks for the Name of the Certifying Jurisdiction. Can you please tell me what the jurisdiction is or how I find it?

If you are not located in the City of Santa Ana, you will want to contact the City in which you will be providing service. We would suggest contacting their Community Development or Housing Department for assistance. If one of these departments is not the administrator of this grant, they can refer you to the appropriate contact. The purpose of the certification is to notify the city (in which you plan to provide service) of your application because Santa Ana residents would be coming into their city to receive these services.

I looked at the link regarding lead based paint. Please tell me if it is our responsibility if we accept HPRP funds and place someone in housing with a child. Do we have to hire and pay for a professional inspector? Does the City assist with recommendations? Does the City know expected costs?

The standards for housing unit inspections are the housing habitability standards described in Appendix C of the Notice. These standards apply only when a program participant is moving into a new unit. They do NOT apply to persons served with HPRP prevention assistance in an existing unit.

Note that the habitability standards are different from the Housing Quality Standards (HQS) used for other HUD programs. Because the HQS criteria are more stringent than the habitability standards, a grantee could use either standard. Also note that the HPRP Notice does not exempt units from having to be compliant with local housing codes. Therefore, if there are requirements that are in both the local housing code and the HPRP Notice, the grantee must comply with the more stringent of the two.

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

Yes, it is your responsibility to do the inspection. The City of Santa Ana will provide HQS Inspection Training for HPRP sub-recipients in the fall of 2009.

It is also your responsibility to insure that the repairs are made. The lead based paint repairs typically include scraping and re-painting. The cost depends on what is required to resolve the problem and the size of area. The City has a list of contractors who participate in our loan programs that can be made available to you, however the City will not be funding these repairs.

Will the City of Santa Ana only consider applications for HPRP funding from agencies that participate in the federal Homeless Management Information System (“HMIS”)? I understand that agencies that are exempt from HMIS participation will be precluded from consideration even if they are otherwise qualified to apply for and receive the funding.

Under data collection and evaluation, the notice says that reporting must be done through HMIS or a “comparable client-level database”. In order to be considered a comparable client-level database, it must comply with the HMIS Data and Technical Standards. The use of a comparable database is allowable under the following circumstances: (1) The grantee's jurisdiction is not located within a CoC; (2) The CoC does not have an HMIS; (3) The grantee and/or subgrantee has a long-standing, client-level legacy data collection system that meets requirements established in the HMIS Data and Technical Standards and will integrate data with HMIS data periodically; or (4) The subgrantee is a domestic violence provider (e.g. organization's primary mission is serving victims of domestic violence/sexual assault/date rape/stalking) and will establish a comparable client-level database internally to its organization (e.g. no identifying data shared with the HMIS or the grantee) and will provide only aggregate data to the grantee as required. The HMIS administering agency, as an agent of the CoC, determines if an alternative database meets the standards for a comparable client-level database, including compliance with the HMIS Data and Technical Standards.

Regarding the admin. part of the budget. Can we include 5%? Or does it go to 2 1/2% with SA taking the other 2 1/2%?

Sub-recipients may request up to 2 ½% of their grant request for eligible administrative costs. Eligible costs include: accounting for the use of grant funds, preparing reports for submission to HUD, obtaining programs audits, HPRP training for staff and staff salaries associated with eligible administrative costs.

What range are you looking for in amount of grant funding requested?

The City does not have a grant amount in mind. Sub-recipients should request the amount needed to carry out the program to which they are applying for funds.

We are applying for homelessness prevention, however data collection is critical for this project. Even though we are not checking data collection on the grant application, you can only check one box, can data collection be part of the budget?

The Recovery Act requires that data collection and reporting for HPRP be conducted through the use of Homeless Management Information Systems (HMIS) or a comparable client-level database. Data collection costs for this purpose will be part of your program costs.