

CITY OF SEATTLE AND KING COUNTY



King County

HPRP PROGRAM REQUIREMENTS

Rapid Re-Housing for Families

October 12, 2009

*This is a program funded by the
American Recovery and Reinvestment Act.* **RECOVERY.GOV**



Acknowledgements

The City of Seattle and King County would like to thank the participating provider agencies, emergency shelters, and other community organizations that assisted us in the process of creating these innovative programs for our community.

We would especially like to thank Solid Ground, Wellspring Family Services, and YWCA of Seattle, King County, Snohomish County.

The City and County have worked cooperatively on this effort to test the rapid re-housing model in our community. We have jointly developed this document and other guiding policies for these programs, and intend to utilize these documents throughout the course of this program.

We would also like to acknowledge the Washington State Department of Commerce for allowing us to adjust this document, which they created, to meet our local needs.

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Rapid Re-Housing for Families Program (RRHF)

Guidelines

1. Program Overview

The Homelessness Prevention and Rapid Re-Housing Program (HPRP) is funded by the Homeless Prevention Fund (HPF) created under Title XII of Division A of the American Recovery and Reinvestment Act (Recovery Act) of 2009. The City of Seattle Human Services Department and King County Housing and Community Development are grantees of the Department of Housing and Urban Development (HUD) and will administer the awards for its sub-recipients.

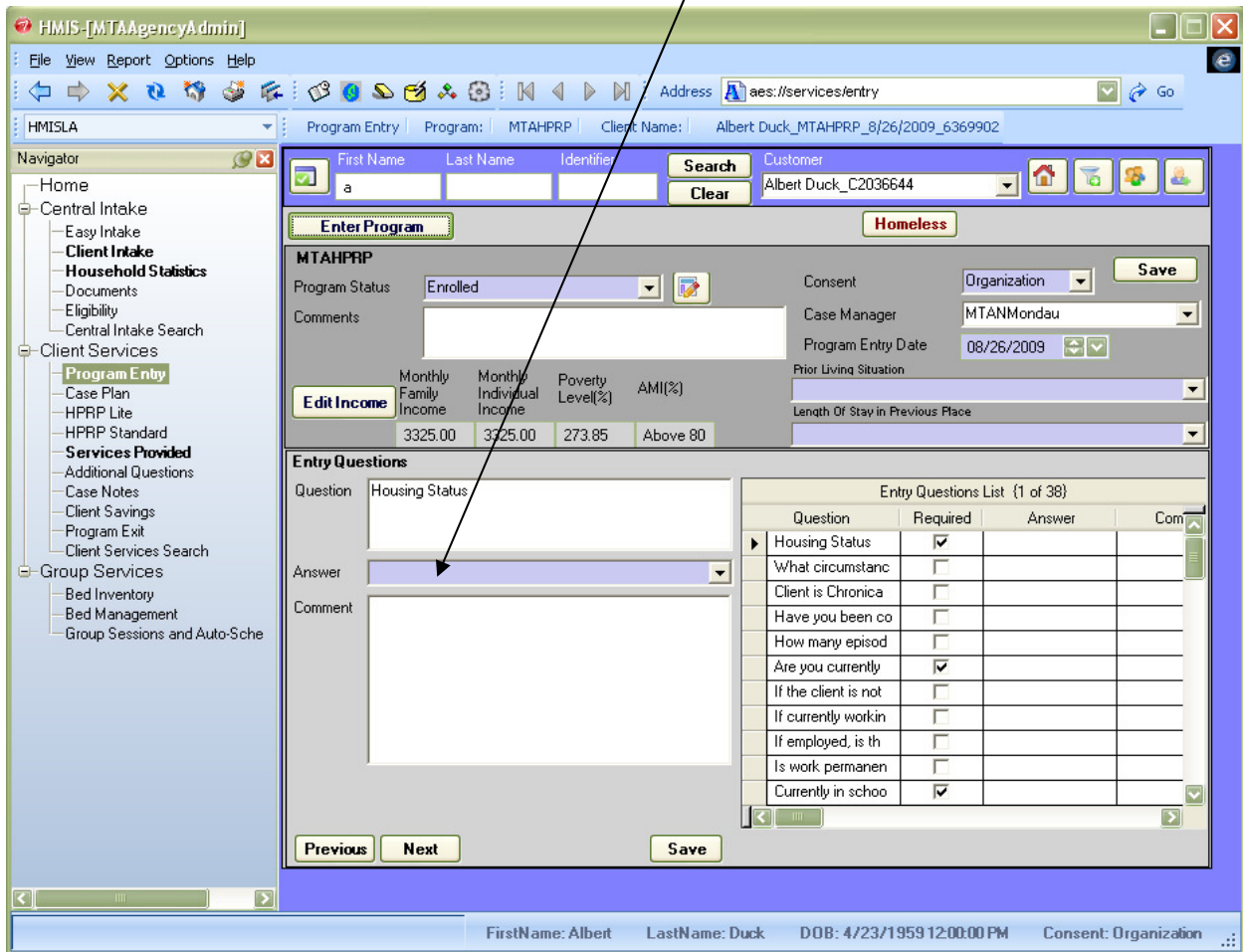
The purpose of the HPRP is to provide homelessness prevention assistance to households who would otherwise become homeless - many due to the economic crisis - and to provide assistance to rapidly re-house persons who are experiencing homelessness. The funds under this program are intended to target individuals and families who would be homeless but for this assistance. The funds will provide for a variety of assistance, including: short-term or medium-term rental assistance and housing relocation and stabilization services, including such activities as mediation, credit counseling, security or utility deposits, utility payments, moving cost assistance, and case management.

2. Eligibility for Assistance – Who can receive support from the HPRP grant funds?

Rapid Re-Housing Eligible Individuals and Households

These people are experiencing homelessness (e.g. living in emergency shelter or on the street) and need temporary assistance in order to obtain housing and retain it.

Within the HMIS Client Services Program Entry Page there is a question area that will identify if a program participant can be served with Rapid Re-Housing activities. If you answer the question that the person is “Literally Homeless,” then they will be recorded under Rapid Re-Housing. If you answer the next two questions about Imminent Risk then they will be recorded under Prevention. You cannot choose other categories, including “Stably Housed, Don’t Know or Refused” for clients in the RRHF / HPRP program.



- RRHF program participants must be homeless or about to become homeless AND:
- Receive an initial consultation and **Assessment** to determine appropriate level of assistance
 - Income at or below 50% Area Media Income (AMI)
 - Have no other housing options (noted in the Assessment)
 - Have no financial resources or support networks to obtain or remain in housing (noted in the Assessment)

(NOTE: There are no age restrictions for program participants; however funds may not be used for youth who are wards of the state.)

There are two initial intake criteria that apply to both populations.

- **Income Eligibility:** The individual or household must be at or below 50 percent of Area Median Income (AMI). The Housing Choice Voucher program (formerly Section 8) uses specific guidelines and data sets to determine eligibility and document income. Verification Guidance can be found on HUD's website at:
<http://www.hud.gov/offices/pih/publications/notices/04/verifguidance.pdf>
- **Assessment:** A sub-recipient 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 prevention or 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.

A. Rapid Re-Housing Eligible Individuals and Households

To be eligible individuals and households must meet both of the following circumstances: (1) no appropriate subsequent housing options have been identified; AND (2) the household lacks the financial resources and support networks needed to obtain immediate housing or remain in its existing housing.

Eligible individuals and households must also meet one of the following criteria:

- 1) Sleeping in an emergency shelter (*priority will be given to clients being referred from emergency shelters*);
- 2) Sleeping in a place not meant for human habitation, such as cars, parks, abandoned building, streets/sidewalks;

Notation for this must be noted in HMIS in the Client Services Program Entry in the Comments section:

The screenshot displays the HMIS [MTAAgencyAdmin] interface. The top navigation bar includes 'File', 'View', 'Report', 'Options', and 'Help'. The address bar shows 'aes://services/entry'. The breadcrumb trail is 'HMSLA > Program Entry > Program: MTAHPRP > Client Name: Albert Duck_MTAHPRP_8/26/2009_6369902'. The main form area is titled 'Enter Program' and includes a 'Homeless' button. The 'MTAHPRP' section shows 'Program Status' as 'Enrolled' and 'Consent' as 'Organization'. The 'Edit Income' section shows 'Monthly Family Income' as 3325.00, 'Monthly Individual Income' as 3325.00, 'Poverty Level(%)' as 273.85, and 'AMI(%)' as 'Above 80'. The 'Entry Questions' section includes a table with columns for 'Question', 'Required', 'Answer', and 'Com'. A red arrow points to the 'Comments' field.

Question	Required	Answer	Com
Housing Status	<input checked="" type="checkbox"/>		
What circumstanc	<input type="checkbox"/>		
Client is Chronica	<input type="checkbox"/>		
Have you been co	<input type="checkbox"/>		
How many episod	<input type="checkbox"/>		
Are you currently	<input checked="" type="checkbox"/>		
If the client is not	<input type="checkbox"/>		
If currently workin	<input type="checkbox"/>		
If employed, is th	<input type="checkbox"/>		
Is work permanen	<input type="checkbox"/>		
Currently in schoo	<input checked="" type="checkbox"/>		

Eligible Activity	RRHF - City of Seattle	RRHF – King County
FINANCIAL ASSISTANCE	\$5,000 per household <u>estimated average</u> subsidy per household, for all forms of financial assistance.	\$10,000 per household <u>estimated average</u> subsidy per household, for all forms of financial assistance.
Eligible Activity	RRHF - City of Seattle	RRHF – King County
Rental Assistance: tenant based rental assistance to help families remain in existing rental units or help them obtain and remain in rental units they select.	<p>Short-term: may not exceed rental costs accrued over a period of 3 months</p> <p>Medium-term: actual rental costs accrued over a period of 4 to 12 months.</p> <p>Program participants must be evaluated for continuing need and re-certified for eligibility at least once every 3 months.</p> <p>No program recipient may receive more than 15 months of rental assistance.</p>	<p>Medium-term: actual rental costs accrued over a period of 0 to 12 months.</p> <p>Program participants must be evaluated for continuing need and re-certified for eligibility at least once every 3 months.</p> <p>No program recipient may receive more than 18 months of rental assistance.</p>
Rental Arrears	Up to 6 months of rental arrears	
Security & Utility Deposits	Allowable.	
Utility Payments	HPRP funds may be used for up to 12 months of utility payments, including up to 6 months of utility payments in arrears (after other resources have been exhausted).	HPRP funds may be used for up to 18 months of utility payments, including up to 6 months of utility payments in arrears (after other resources have been exhausted).
Moving Cost Assistance	Reasonable 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.	
Motel and Hotel Vouchers	Up to 30 days maximum if no appropriate shelter beds are available and subsequent rental housing has been identified but is not immediately available for move-in.	

3. Eligible Program Activities and Expenses – What can HPRP pay for?

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. Rather, assistance should be focused on housing stabilization, linking program participants to community resources and mainstream benefits, and helping them develop a plan for preventing future housing instability. Sub-recipients should therefore ensure that there is a clear process for determining the type, level, and duration of assistance for each program participant.

In order for individuals or households to receive HPRP support, financial assistance or housing relocation and stabilization services, participants must have at least an initial consultation with a case manager or other authorized representative who can determine the appropriate type of assistance to meet their needs.

There are four categories of eligible program activities and expenses, described in detail below:

- A. Financial Assistance**
- B. Housing Relocation and Stabilization Services**
- C. Data Collection and Evaluation**
- D. Administrative costs**

These eligible activities are intentionally focused on housing: financial assistance to help pay for housing, or services designed to keep people in housing or to find housing. Generally, the intent of HPRP assistance is to rapidly transition program participants to stability, either through their own means or through public assistance, as appropriate.

A. Financial Assistance

Sub-recipients are responsible for verifying and documenting all payments made on behalf of the client whether it is rent, utilities, moving costs, hotel or motel payments, etc. in an easily identifiable manner which will be reviewed in entirety during grant monitoring by the City of Seattle Human Services Department.

All of the types of Financial Assistance must also be noted in HMIS (except Staff costs to issue Financial Assistance) in the Services Provided Activity section.

The screenshot shows the HMIS [MTAGroup1] application window. The title bar reads "HMIS [MTAGroup1]". The menu bar includes "File", "View", "Report", "Options", and "Help". The address bar shows "Address: /services/services". The breadcrumb trail is "Services Provided | Program: MTAHPRP | Client Name: Albert Duck_MTAHPRP_8/26/2009_6369902".

The Navigator on the left shows a tree view with the following structure:

- Home
 - Central Intake
 - Easy Intake
 - Client Intake
 - Household Statistics
 - Documents
 - Central Intake Search
 - Client Services
 - Program Entry
 - Case Plan
 - Services Provided
 - Case Notes
 - Client Savings
 - Program Exit
 - Client Services Search
 - Group Services
 - Group Sessions and Auto

The main window displays a search bar with fields for "First Name" (value: duck), "Last Name", and "Identifier". There are "Search" and "Clear" buttons. Below the search bar is a "Customer" dropdown menu with the value "Albert Duck_MTAHPRP_8/26/20".

The "Activity" section at the bottom has a form with the following fields:

- Buttons: "New", "Save", "Delete", "Schedule"
- Activity: "Motel & Hotel Vouchers (HPRP)"
- Staff: "MTANMondau"
- Date: "08/26/2009" To: [dropdown]
- Amount: "1" Cost
- Description: [text field]
- Comment: [text field]

Below the form is a table titled "Activities (3 of 3)":

Activity	ActivityType	Description	Star
Enrollment	Service		8/26/2
Moving Cost Assi	Energy		8/26/2
	Service		8/26/2

At the bottom of the window, there is a status bar with the following information: "FirstName: Albert LastName: Duck DOB: 4/23/1959 12:00:00 PM Consent: Organization".

Sub-recipients must not make payments directly to program participants, but only to third parties, such as landlords or utility companies. In addition, an assisted property may not be owned by the Lead Agency, or the parent, subsidiary or affiliated organization of the Sub-recipient.

There are several types of eligible Financial Assistance outlined below.

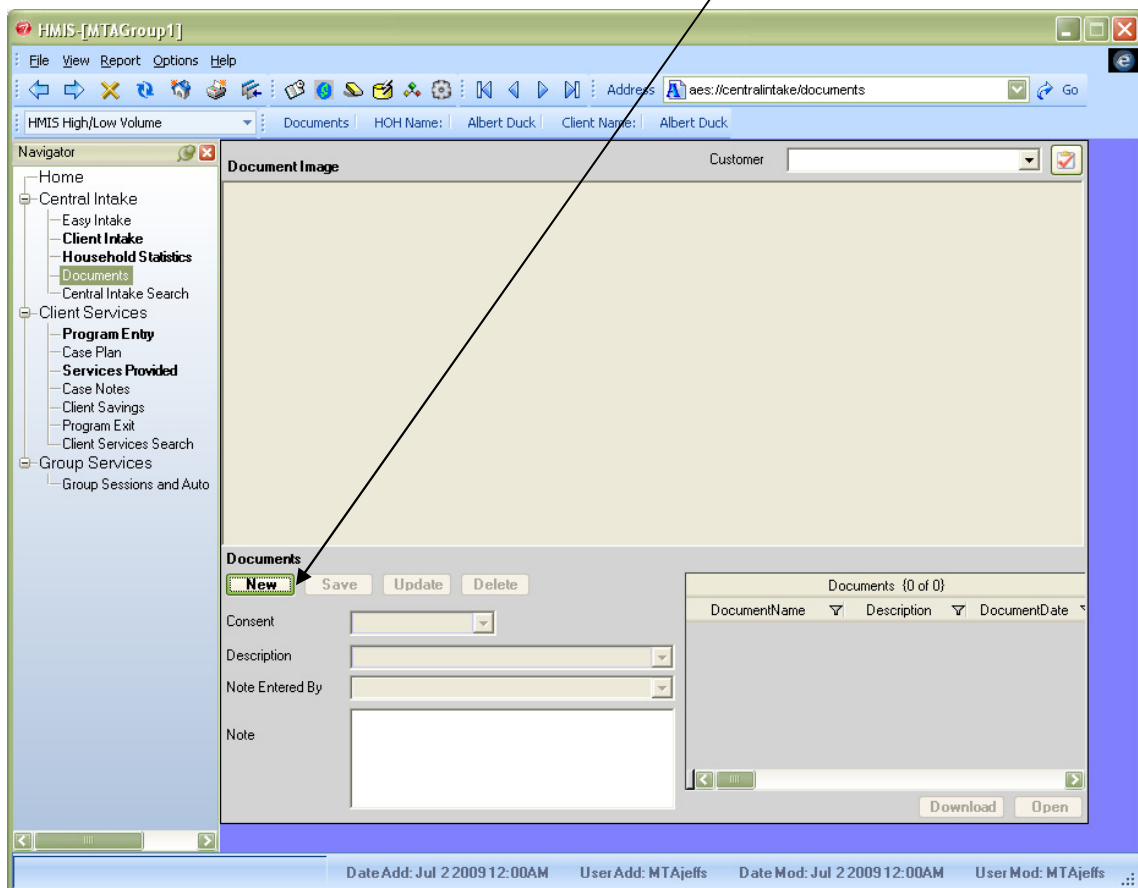
- 1) Rental Assistance**
- 2) Security and Utility Deposits**
- 3) Utility Payments**
- 4) Moving Costs**
- 5) Hotel/Motel Vouchers**
- 6) Staff costs to issue Financial Assistance**

7) Inspections for Habitability Standards and Lead Inspections

1) Rental Assistance

Tenant-based rental assistance can be for individuals and households to remain in their existing rental units (prevention) or to help them obtain and remain in rental units they select (rapid re-housing).

- A lease must be in place and the program participant must be on the lease. We expect you to keep a copy of the lease in the client file and recommend uploading it into HMIS in the Central Intake section into the Documents page.



- **Sub-recipients cannot place program participants in units they own and pay themselves rent.**

The following rental assistance is available:

Short-term rental assistance – City Only. Costs may not exceed rental costs accrued over a period of 1 to 3 months. After 3 months, if program participants receiving short-term rental assistance need additional financial assistance to remain housed, they must be evaluated for eligibility to receive medium-term rental assistance.

Medium-term rental assistance – Costs may not exceed rental costs accrued over a period of 4 to 12 months (City) or 4 to 18 months (County) (see chart on page 8). No program participant may receive more than 15 months (City as a result of exception granted by HSD) or 18 months (County) of total rental assistance (see chart on page 8).

Amount of rental assistance – Sub-recipients determine the amount of short-term and medium-term rental assistance provided, such as "shallow subsidies" (payment of a portion of the rent), payment of 100 percent of the rent charged, or graduated/declining subsidies. A Sub-recipient may also set a maximum amount of assistance that a single individual or family may receive from HPRP funds, or may set a maximum number of times that an individual or family may receive assistance, as long as the total amount of assistance that any individual or family receives does not exceed an amount equal to 12 months (City) or 18 months (County) of total rental assistance (see chart on page 8). The City of Seattle Human Services Department and King County Department of Community and Human Services (DCHS) will request the sub-recipient's emergency rental assistance policies and procedures with their funding application and will monitor each agency's performance against those documents.

Rental Arrears – Rental assistance may also be used to pay for up to 6 months of rental arrears for eligible program participants. Rental arrears may be paid if the payment enables the program participant to move to another unit. If HPRP funds are used to pay rental arrears, arrears must be included in determining the total period of the program participant's rental assistance, which may not exceed 12 months (City) or 18 months (County) of total financial assistance (see chart on page 8).

Tenant Rent Share

Sub-recipients may require program participants to share in the costs of rent, utilities, security and utility deposits, moving, hotel or motel, and other expenses as a condition of receiving HPRP financial assistance. For example, a program may require a program participant to pay a portion of the rent expense for a unit. **HPRP assistance should be "needs-based," meaning that Sub-recipients should determine the amount of assistance based on the minimum amount needed to prevent the program participant from becoming homeless or returning to homelessness in the near term.** This will help agencies to utilize program resources efficiently to serve as many households as possible.

When a participant resides with other persons (except a spouse, domestic partner, or other dependents) in a single unit, the combined rent and utilities paid by the participant and program must not exceed a prorated share of the total rent. For example: A unit rents for \$900/month and there are three persons sharing the unit. Only one of the renters is

participating in HPRP. The combined rent and utilities, paid by the program and participant, must not exceed \$300 or 1/3 of the total rent.

Rent Reasonableness

The rental assistance paid cannot exceed the actual rental cost, which must be in compliance with HUD's standard of "rent reasonableness." "Rent reasonableness" means that the total rent charged for a unit must be reasonable in relation to the rents being charged during the same time period for comparable units in the private unassisted market and must not be in excess of rents being charged by the owner during the same time period for comparable non-luxury unassisted units. To make this determination, the sub-recipient 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

Rental assistance payments cannot be made on behalf of eligible individuals or households for the same period of time and for the same cost types that are being provided through another federal, state or local housing subsidy program.

2) Security and Utility Deposits

HPRP funds may be used to pay for security deposits, including utility deposits, for eligible program participants. The City of Seattle Human Services Department is giving sub-recipients the discretion to recover the deposits in which case it must be treated as program income (and therefore expended by the end of your 2-year grant period) or allowing the household to keep the deposit.

3) Utility Payments

HPRP funds may be used for up to 12 months (City) or 18 months (County) of utility payments (see chart on page 8). This includes up to 6 months of utility payments in arrears, for each program participant, provided that the program participant or a member of his/her household has an account in his/her name with a utility company or proof of responsibility to make utility payments, such as cancelled checks or receipts in his/her name from a utility company. Eligible utilities include gas, electric, water, sewer and garbage. Telephone, cell and internet are not eligible expenses.

If HPRP funds are used for utility payments, including utility arrears but not utility deposits, they must be included in determining the total period of the program participant's financial assistance, which may not exceed 12 months (City) or 18 months (County) of total financial assistance (see chart on page 8).

We expect you to keep a copy of this documentation in the client file and recommend uploading into HMIS in the Central Intake section into the Documents page.

4) Moving Costs

HPRP funds may be used for reasonable 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.

5) Motel and Hotel Vouchers

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.

6) Staff costs to issue Financial Assistance

This cost is not for case management. This cost is associated with the salary and benefits of the bookkeeper who issues checks to landlords or paying hotel or motel bills on behalf of a program participant because it is directly related to the delivery of Financial Assistance.

7) Inspections for Habitability Standards and Lead Based Paint Inspections

This cost is not for case management. This cost is associated with the salary and benefits of the staff person performing and documenting unit inspections.

B. Housing Relocation and Stabilization Services

HPRP funds may be used for services that assist program participants with housing stability and placement. These services are limited to the following eligible activities:

- 1) Case Management**
- 2) Outreach and Engagement**
- 3) Housing Search and Placement**
- 4) Legal Services**
- 5) Credit Repair**
- 6) Other costs, as approved by Commerce**

1) 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. Services and activities may include: counseling; developing, securing, and coordinating services; monitoring and evaluating program participant progress; assuring that program participants' rights are protected; and developing an individualized housing and service plan, including a path to permanent housing stability subsequent to HPRP financial assistance.

2) 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.

3) Housing Search and Placement

HPRP housing search and placement funds may be used for services or activities designed to assist individuals or households in locating, obtaining, and retaining suitable housing. Services or activities may include: tenant counseling, assisting individuals and households to understand leases, securing utilities, making moving arrangements, representative payee services concerning rent and utilities, and mediation and outreach to property owners related to locating or retaining housing.

4) Legal Services

HPRP funds may be used for 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.

5) 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, accessing a free personal credit report, and resolving personal credit issues.

C. Data Collection

Federal rules require each sub-recipient to enter client data into a Homeless Management Information System (HMIS). Eligible costs include data collection, entry and analysis, equipment, and staffing associated with the operation of the HMIS, including training costs directly associated with the HPRP.

Each sub-recipient must follow all state and federal laws governing HMIS, including collecting informed written consent from clients, not denying service based solely on client refusal to provide data to an HMIS, protecting client confidentiality, not collecting personally identifying information from clients that are victims of domestic violence, and other requirements defined in [RCW 43.185C.030](#), [43.185C.180](#), and [VAWA Reauthorization Section 605](#).

D. Administrative Costs

Administrative expenses are also sometimes called indirect or overhead. Such expenses can include, but are not limited to the following: Executive Director/accounting/human resource salaries, benefits, supplies, space, equipment, etc.; general agency insurance; audits; preparing reports; board expenses; membership or association fees, dues and specific HPRP training for staff who will administer the program or case managers who will serve program participants, as long as this training is directly dated to learning about HPRP.

In cost reimbursement contracts, grants or interagency agreements, administration/indirect/overhead expenses can be charged to the funding sources using either a cost allocation plan or a federally approved indirect cost rate. However, organizations with an approved indirect cost rate cannot charge that rate to a single "indirect cost" line item in the grant. Instead, they should break out the costs necessary to operate the program and charge them directly under either Financial Assistance or Housing Relocation and Stabilization Services or Data Collection, whichever is appropriate. For example, the appropriate proportion of the salary for the staff person responsible for making rental assistance payments is allowable under "Financial Assistance." In this scenario, the proportionate cost of a new computer for that staff person to issue financial payments is also allowed. Therefore, under HPRP, many costs otherwise included in an indirect cost rate are charged as direct costs under the appropriate line item.

Regardless of the method used, the rate of reimbursement shall not exceed that specified in the contract. All reimbursements shall be based on actual expenses. Estimates such as 1/12th do not qualify for reimbursement.

Administrative costs *do not* include the costs of issuing financial assistance, providing housing relocation and stabilization services, or carrying out eligible data collection and evaluation activities, such as sub-recipient staff salaries, costs of conducting housing inspections, and other operating costs. These costs should be included under one of the three other eligible activity categories.

4. Ineligible and Prohibited Activities

For Program Participants:

- Mortgage costs or any homeowner costs needed to assist with any fees, taxes, or other costs of refinancing a mortgage to make it affordable**
- Charging a program participant a fee for service
- Issuing funds directly to program participant
- Rental assistance exceeding 18 months
- Construction or rehabilitation costs
- Credit card bills or other consumer debt
- Car repair or other general transportation costs
- Travel costs not associated with Moving Assistance (see page 8)
- Food
- Medical or dental care and medicines
- Clothing and grooming

- Home furnishings
- Child care
- Pet care
- Entertainment activities
- Work or education related materials
- Cash assistance
- Employment training
- Certifications, licenses, and general training classes

**HPRP is not a mortgage assistance program. However, homeowners who become homeless are eligible for all HPRP activities; provide they meet the other eligibility criteria. Homeowners who are housed but are at risk of becoming homeless and meet all other eligibility criteria (consultation with a case manager, below 50% AMI, and at risk of becoming homeless with not housing options and lack financial resources) may be assisted with the following: utility payments (including arrears but excluding deposits) and housing relocation and stabilization services (including credit repair, case management, and housing search/placement but excluding legal services).

For sub-recipients:

- Costs associated with general training for case managers to enhance their job skills
- Costs associated with attending conferences or workshops

5. Coordination with Recovery Act Resources and Other Resources

The sub-recipient is strongly encouraged, as part of local planning, to maximize all resources that may be available with Recovery Act funds other than HPRP. A sub-recipient'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. Case managers should work to link program participants to these other resources.

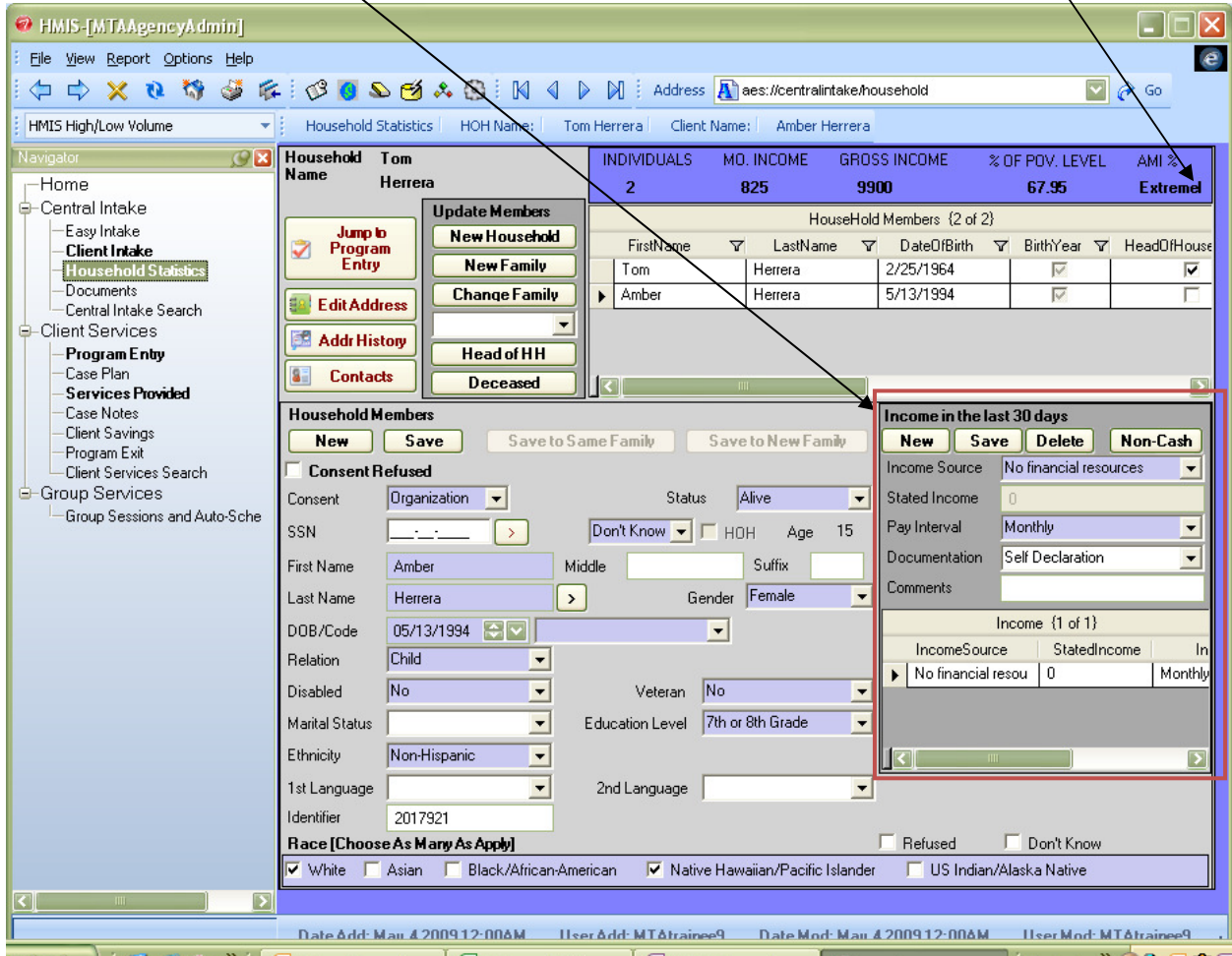
The sub-recipient must ensure that the individuals and households receiving service are not also receiving duplicated assistance from the Department of Social and Health Services (DSHS), the Washington Department of Veterans Affairs or assistance from the Washington State Low-Income Home Energy Assistance Program.

6. Income Eligibility and Income Verification

Income Eligibility: The individual or household must be at or below 50 percent of Area Median Income (AMI). The agency must use the guidance available for the Housing Choice Voucher program (formerly Section 8). It is prospective and the 50% AMI limit is not based on the household's previous income, but on its income and assets at the time of application to the program. If an individual recently lost his/her job and has no income or assets that put them above 50% of AMI, and meet all the other eligibility criteria, they are eligible to receive HPRP

assistance. Verification Guidance can be found on HUD’s website at:
<http://www.hud.gov/offices/pih/publications/notices/04/verifguidance.pdf>

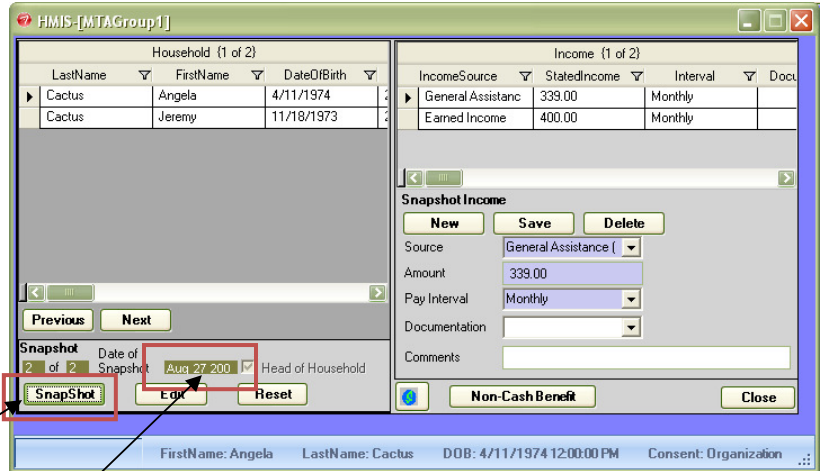
You must enter Income Information in HMIS. AMI will be calculated for you.



In HMIS, Extreme AMI is between 0% and 30%. Very Low is between 31% and 50%. City of Seattle Human Services staff and King County DCHS staff will monitor that HPRP program participants in your HMIS are at one of these two levels throughout the time they are enrolled in your program.

Every 3 months update and record each household's income. To do these please follow these four simple steps:

1. Edit the household income on the Household Statistics page in Central Intake.
2. After saving, click "Jump to Program Entry."
3. On the Program Entry page click "Edit Income."
4. Click the "Snapshot" button in the pop-up window.



This will save a snapshot of the household income. You know you are done when you see the current date next to "Date of Snapshot."

** Please carefully manage this important step because unless you create a Snapshot, there will be no historical record of income.

Income Verification: All income must be verified and documented by the contractor. Verification of income eligibility may include pay stubs, tax statements, verification from employers, DSHS/Employment Security/Social Security documents, or other verification approved by Commerce.

There are four acceptable methods of documenting Income Eligibility (in order of preference):

- 1) **Written:** The contractor gets third-party written verification directly from the information source; i.e., employer, DSHS, Employment Security, Social Security, Veteran's Affairs.
- 2) **Oral:** If verification is oral, the contractor must document the conversation in the program participant's file. This documentation should include the name, telephone number, and position or title of the third party, the date and time of the conversation, and the name of the person requesting the verification.
- 3) **Documented:** This type of verification is used when the information desired does not require verification by a third party, such as birth certificates or social security cards.
- 4) **Self-Declared:** Program participant written statements or affidavits are acceptable only when other verifications are not available. Since this method is self-serving, it should be viewed with caution and accepted only as a last resort.

7. Documentation

A. Homelessness Verification and Documentation

The sub-recipient is required to maintain adequate documentation of homelessness to determine the eligibility of persons served. A copy of the documentation must be maintained in the client file. Documentation should be as follows:

Situation	Documentation
Persons living on the street or in short-term emergency shelter	Information should be obtained to indicate that the participant is living on the street or in short-term emergency shelter. This may include names of organizations or outreach workers who have assisted them in the past, whether the client receives any general assistance checks and where the checks are delivered, or any other information regarding the participant's activities in the recent past that might provide documentation. If unable to verify that the person is living on the street or in short-term emergency shelter, the participant or a staff person may prepare a short written statement about the participant's previous living place. The participant should sign the statement and date it.

***Self-Declaration: Written statements by clients are acceptable ONLY when other verifications are not available. Since this method is self-serving, it should be viewed with caution and accepted as a last resort. Case manager may write the narrative if the client is unable. Client signature is required.**

The City of Seattle Human Services Department and King County DCHS do not require that copies of an individual's driver's license, birth certificate or other identifying information be required or maintained in a client file to be eligible for assistance or services. If the sub-recipient chooses to request this type of documentation, it should be for a specific, appropriate and time limited purpose and maintained in a confidential manner.

8. Termination of Participation, Denial and Grievance Procedures

A. Termination of Participation and Grievance Procedures

Causes for termination from the program may include, but are not limited to, failure to abide by the program requirements. The sub-recipient may resume assistance to a program participant whose assistance was previously terminated. In terminating assistance to a program participant, the sub-recipient 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.

B. Applicant Denial and Grievance Procedures

Causes of denial of assistance include, but are not limited to, the individual or household's ineligibility for the program or failure to provide verifiable evidence of eligibility, etc. Sub-recipients must have in place a procedure that governs applicant denial and grievance process. These procedures should describe the program requirements and in which an applicant may not qualify or be denied. The grievance procedure could be the same as a program participant terminated. This would include, for example, allowing applicants to request a hearing regarding the termination of their denial.

The termination, denial, and grievance procedures should be readily available to participants either in written information or by posting the policy in a public place. It is important to effectively communicate these procedures to program participants and ensure that the procedures are fully understood.

9. Nondiscrimination and Equal Opportunity Requirements

The sub-recipient must comply with all applicable fair housing and civil rights requirements in 24 CFR 5.105(a). In addition, sub-recipients must make known that 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 Lead Agency must take reasonable steps to ensure meaningful access to programs to persons with limited English proficiency (LEP), pursuant to Title VI of the Civil Rights Act of 1964. This may mean providing language assistance or ensuring that program information is available in the appropriate languages for the geographic area served by the jurisdiction and that limited English proficient persons have meaningful access to HPRP assistance. This will be a particular issue for state sub-recipients that may not be aware of LEP speaking populations in jurisdictions that are not normally served with Emergency Shelter Grant (ESG) funds. To assist sub-recipients, 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 Federal Register 2732; January 22, 2007). In addition, all notices and communications shall be provided in a manner that is effective for persons with hearing, visual, and other communication-related disabilities consistent with section 504 of the Rehabilitation Act of 1973 and implementing regulations at 24 CFR 8.6. If the procedures that the Lead Agency 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 Lead Agency must establish additional procedures that will ensure that such persons are made aware of the rental assistance and services.

10. Affirmatively Furthering Fair Housing

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

11. Lead-Based Paint Requirements

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 (noted in **bold** above) 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.

Visual assessments can be conducted by a HUD-Certified Visual Assessor under HPRP, and must meet the requirements as outlined in the Lead-Based Paint Poisoning Prevention Act, as noted in Section VII.F of the Notice. A 20-minute online training course on conducting visual assessments can be found on HUD's website at <http://www.hud.gov/offices/lead/training/visualassessment/h00101.htm>

Inspection Reports must be noted in HMIS for the program participant that the unit was inspected for under the Services provided page in Activity. You will find a specific Activity called Lead Based Paint Inspection.

The screenshot shows the HMIS [MTAGroup1] web application. The browser address bar is `aaes://services/services`. The client information is: Program: MTAHPRP, Client Name: Albert Duck_MTAHPRP_8/26/2009_6369902, Customer: Albert Duck_MTAHPRP_8/26/20.

The left navigation pane includes: Home, Central Intake (Easy Intake, Client Intake, Household Statistics, Documents, Central Intake Search), Client Services (Program Entry, Case Plan, Services Provided, Case Notes, Client Savings, Program Exit, Client Services Search), and Group Services (Group Sessions and Auto).

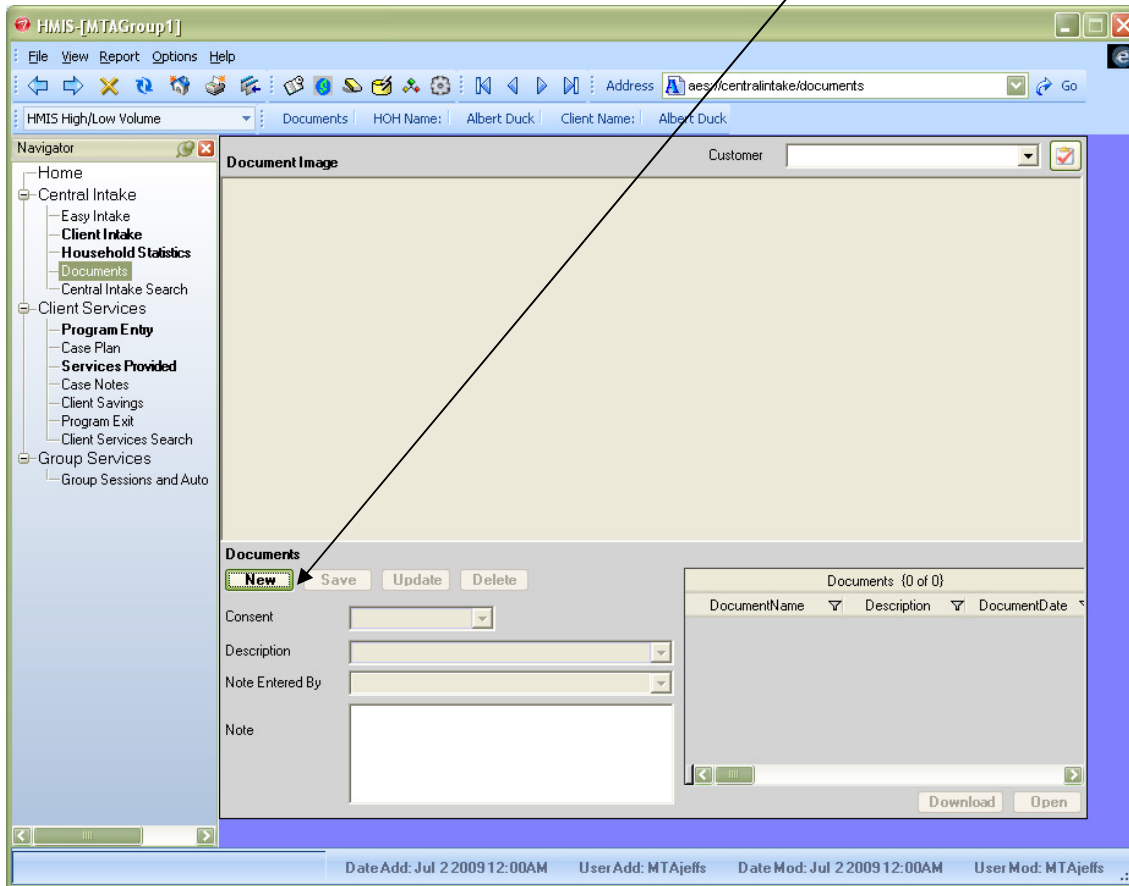
The 'Activity' section has buttons for New, Save, Delete, and Schedule. The 'New' button is highlighted with an arrow from the text above. The activity details are: Activity: Motel & Hotel Vouchers [HPRP], Staff: MTANmondau, Date: 08/26/2009, Amount: 1.00, Cost.

The 'Activities (3 of 3)' table is as follows:

Activity	Activity Type	Description	Start
Enrollment	Service		8/26/2
Moving Cost Assi	Energy		8/26/2
	Service		8/26/2

The status bar at the bottom shows: FirstName: Albert, LastName: Duck, DOB: 4/23/1959 12:00:00 PM, Consent: Organization

We expect you to keep a copy of this proof in the client file and recommend uploading it into HMIS in the Central Intake section into the Documents page.



12. 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.

13. 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 sub-recipient 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 WRP, 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.

14. 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.

15. Confidentiality of Client Records

The sub-recipient must have policies and procedures ensuring client records are maintained in a confidential manner, and 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 sub-recipient. To comply with this requirement, sub-recipients should, for example, keep written records or files pertaining to clients under lock and key with designated personnel granted access to those files.

16. Criminal Background Checks

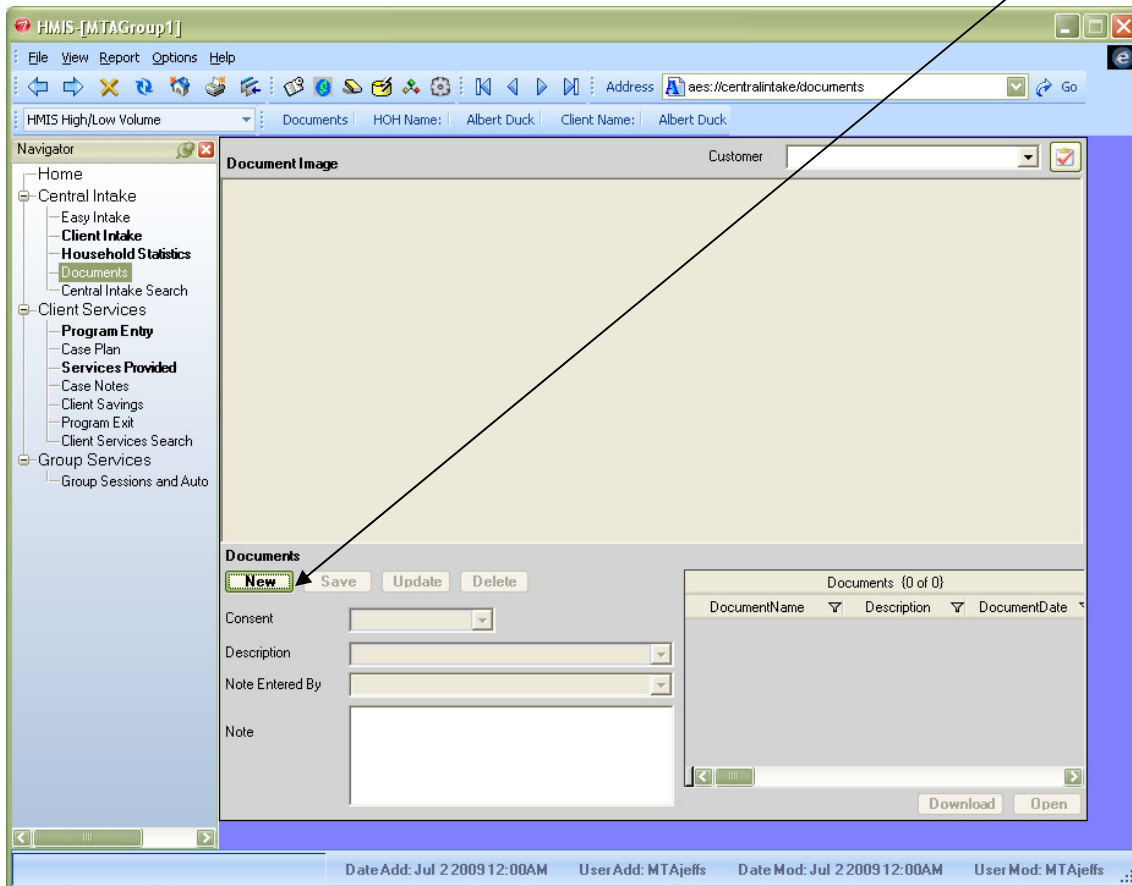
The sub-recipient must initiate criminal history background checks pursuant to WA State RCW 43.43.832 and 43.43.834 for all prospective employees and volunteers who may have unsupervised access to children.

17. Habitability Standards and Inspections

Organizations providing rental assistance with HPRP funds will be required to conduct initial and any appropriate follow-up inspections of housing units into which a program participant will be moving. Units should be inspected on an annual basis and upon a change of tenancy.

Inspections are not required where clients are staying in their own housing. The minimum habitability standards are listed in Appendix A.

Complete records of inspections and follow-up actions must be maintained in client files, and we recommend uploading it into HMIS in the Central Intake section into the Documents page.



The standards for housing unit inspections are the housing habitability standards described in Appendix C of the Notice. These standards apply only when a program participant is receiving financial assistance and moving into a new unit. They do NOT apply to persons receiving services only. They also do not apply to persons served with HPRP prevention assistance in a unit in which the program participants were already residing.

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 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, 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.

Tenants must receive a copy of the Washington Residential Landlord-Tenant Act, RCW 59.18, and be informed on how to use this law when problems arise. Copies of the law are available from the Tenant Union of Washington State at 206.723.0500, local branches of Columbia Legal Services, and on the websites for the Office of the Attorney General (www.atg.wa.gov) and NW Justice Project (www.nwjustice.org). The Tenant Union website (www.tenantsunion.org) answers tenant's questions. The Attorney General's website (www.atg.wa.gov) is a resource for both landlords and tenants.

18. Program Administration

A. Sub-recipient Eligibility

An eligible Sub-recipient must:

- 1.) Be a unit of local government in the state, and/or
- 2.) Be a private non-profit organization or housing authority, if the local government for the locality in which the program is located certifies that it approves the program.

Organizations that are religious or faith-based are eligible, on the same basis as any other organization. However, organizations 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. 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.

B. Central Contractor Registration and DUNS Number

The Lead sub-recipient is required to register with Duns and Bradstreet to obtain a DUNS number, if it has not already done so and complete or renew its registration in the Central Contractor Registration (CCR). A DUNS number is required to register with CCR.

Duns and Bradstreet – www.dnb.com
Central Contractor Registration - www.ccr.gov

C. Sub-recipient Responsibilities

1) Sub-awardee contracts

A Sub-recipient cannot sub-award work or services contemplated under this program without prior authorization from The City of Seattle Human Services Department or King County DCHS. It is the responsibility of the sub-recipient to ensure that sub-awardees meet eligibility requirements.

A sub-recipient with sub-awardee(s) must enter into legally binding written grant agreements to ensure that all City of Seattle Human Services Department and King County DCHS grant terms and conditions are passed on to sub-awardees. This must include a signed grant that details the budget to be reimbursed and all of the City of Seattle Human Services Department and King County DCHS grant terms and conditions.

2) Monitoring and Compliance of Subgrantees

It is the responsibility of the Sub-recipient to monitor sub-awardees at a minimum of once every program year. The monitoring may consist of either a desk monitor or on-site visit. Terms and conditions of the grant and program guidelines need to be reviewed for compliance. At least one month of back up documentation needs to be reviewed to substantiate charges made to the program.

The sub-recipient must review the accounting practices of sub-awardees that do not have an independent audit.

The sub-recipient must ensure all funds are expended in a timely manner, and according to the terms and conditions of the City of Seattle Human Services Department or King County DCHS grant.

The City of Seattle Human Services Department and King County DCHS will review the sub-recipient's monitoring reports of their sub-awardees.

3) Deadlines for Using Grant Award

Each sub-recipient must draw down 100 percent of the award amount within two years from the date the executed contract was signed with the City of Seattle Human Services Department.

Each sub-recipient must draw down 100 percent of the award amount within three years from the date the executed contract was signed between King County DCHS and HUD.

D. Billing Procedures

Sub-recipients must bill the City of Seattle Human Services Department or King County DCHS monthly for reimbursement of allowable costs, using the forms provided by the appropriate funding agency. Payment will be made upon receipt of all required documents and reports. If required reports are not submitted in a timely manner, the City of Seattle Human Services Department or King County DCHS will delay payment until the reports are received. If the sub-recipient fails to file an invoice within a one-month period, without a reasonable explanation, the City of Seattle Human Services Department or King County DCHS will not authorize payment and may elect to terminate the contract.

Sub-recipients 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 government.

E. Financial Records

The sub-recipient must maintain copies of all reimbursement requests and backup documentation including those from subgrantees. The sub-recipient must maintain records that disclose all costs, including sub-awardee costs, charged to the City of Seattle Human Services Department or King County DCHS contract.

F. Reports

The sub-recipient is responsible for submitting required reports by the dates due using required forms. The reports include, but are not limited to, the following:

Report	Due Date
Invoice Forms	No more than monthly, due on the 5 th of month following the provision of services.
Quarterly Performance Report	By the 5 th of the month of each quarter.

G. Budget Amendments

The approved budget will be identified in the contract documents. Budget revisions require a contract amendment. Requests must be submitted to, and approved by, the City of Seattle

Human Services Department or King County DCHS before the sub-recipient submits expenditure reports reflecting the revisions.

H. Sub-recipient Monitoring

A monitoring schedule will be sent to the sub-recipient by the end of 2009 outlining desk and on-site visits for the contract period. At a minimum, a sub-recipient can expect desk monitoring once a year.

I. Changes to Guidelines

The City of Seattle Human Services Department and King County DCHS may issue revised or new guidelines at any time. All sub-recipients will be sent revised copies as they are published. It is the sub-recipient's responsibility to share revisions with sub-awardees.

Appendix A

Organizations providing rental assistance with HPRP funds will be required to conduct initial and any appropriate follow-up inspections of housing units into which a program participant will be moving. Following are the habitability standards that sub-recipients must follow:

- (1) State and local requirements. Each sub-recipient or sub-awardee under this Notice must ensure that housing occupied by a family or individual receiving HPRP assistance is in compliance with all applicable state and local housing codes, licensing requirements, and any other requirements in the jurisdiction in which the housing is located regarding the condition of the structure and the operation of the housing or services.
- (2) Habitability standards. Except for less stringent variations as are proposed by the sub-recipient or sub-awardee and approved by HUD, housing occupied by a family or individual receiving

HPRP assistance must meet the following minimum requirements:

- (1) Structure and materials. 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 the elements.
- (2) Access. 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) Space and security. Each resident must be afforded adequate space and security for themselves and their belongings. Each resident must be provided an acceptable place to sleep.

- (4) Interior air quality. 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) Water supply. The water supply must be free from contamination.
- (6) Sanitary facilities. Residents must have access to sufficient sanitary facilities that are in proper operating condition, may be used in privacy, and are adequate for personal cleanliness and the disposal of human waste.
- (7) Thermal environment. The housing must have adequate heating and/or cooling facilities in proper operating condition.
- (8) Illumination and electricity. 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) Food preparation and refuse disposal. All food preparation areas must contain suitable space and equipment to store, prepare, and serve food in a sanitary manner.
- (10) Sanitary condition. The housing and any equipment must be maintained in sanitary condition.
- (11) Fire safety.
 - (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 hearing-impaired persons, smoke detectors must have an alarm system designed for hearing-impaired persons in each bedroom occupied by a hearing-impaired 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, community rooms, day care centers, hallways, stairwells, and other common areas.