

HUD Monitoring Tools for HPRP

Guide for Review of HPRP-Assisted Housing

NOTE: All questions that address requirements contain the citation for the source of the requirement (statute, regulation, or grant agreement). If the requirement is not met, HUD must make a finding of noncompliance. All other questions (questions that do not contain the citation for the requirement) do not address requirements, but are included to assist the reviewer in understanding the participant's program more fully and/or to identify issues that, if not properly addressed, could result in deficient performance. Negative conclusions to these questions may result in a "concern" being raised, but not a "**finding.**"

Instructions: This Exhibit is designed to review the quality of the housing, including meeting habitability standards. Follow guidance on program participant file sampling in Section 8-3.C in the introductory text to this Chapter as well as Section 2-7.C in Chapter 2 of this Handbook. This same sample of files can also be used for Exhibit 8-3, "Guide for Review of HRPR Financial Assistance and Housing Relocation and Stabilization Services."

Questions:

1.

Do the records indicate that rental assistance paid for the unit(s) is (are) in compliance with HUD's standard for rent reasonableness? [HPRP Notice – Section IV. Requirements for Funding (A) (1) (a) (4) Eligible Activities]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
Describe Basis for Conclusion: 	

2.

For any units for which HPRP funds were used to assist program participants to move into, was there evidence that the units were inspected prior to occupancy and that the habitability standards were met? [HPRP Notice – Section VII. Other Federal Requirements (C) Habitability Standards and HPRP Notice – Appendix C]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
Describe Basis for Conclusion: 	

3.

Homelessness Prevention and Rapid Re-housing Program

Does the grantee have written procedures for housing termination and due process? [HPRP Notice – Section V. Post-Award Requirements (E) Termination of Housing Assistance]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
Describe Basis for Conclusion:	

4.

If clients have been terminated from housing, does a review of the terminated client files show that the minimum due process requirements for termination were followed? [HPRP Notice – Section V. Post-Award Requirements (E) Termination of Housing Assistance]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
Describe Basis for Conclusion:	

Homelessness Prevention and Rapid Re-Housing Program (HPRP)

**Guide for Review of HPRP Financial Assistance and
Housing Relocation and Stabilization Services**

Instructions: This Exhibit is designed to assess the grantee’s performance in conducting on-going program participants’ needs assessments and providing the homelessness prevention assistance or rapid re-housing assistance activities identified in the approved Consolidated Plan’s Annual Action Plan, the Integrated Disbursement and Information System (IDIS) completion screens, and Homeless Management Information System (HMIS). In order to ensure a good mix of project activities for review, select both completed and underway activities. The instructions for sample program participant file selection are included in Section 8-3.C in the introductory text to this Chapter. The same files randomly selected and used for this Exhibit can also be used to complete Exhibit 8-2, “Guide for Review of HPRP Housing,” and Exhibit 8-4, “Guide for Review of Program Participants.”

Questions:

1.

Do the program participants’ files indicate that HPRP assistance has been limited to a maximum of 18 months of rental assistance, 18 months of utilities assistance and 18 months of supportive services provided? [HPRP Notice Section IV. Requirements for Funding (A) Eligible Activities (1) and (2)]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
Describe Basis for Conclusion:	

2.

If HPRP funds were used to pay rental and/or utility arrears, was that assistance limited to six months for each type? [HPRP Notice Section IV. Requirements for Funding (A) Eligible Activities (1)(a)(3)]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
Describe Basis for Conclusion:	

3.

Homelessness Prevention and Rapid Re-housing Program

If HPRP funds were used to pay rental/utility arrears, were those months of assistance included within the 18-month limitation of assistance? [HPRP Notice Section IV. Requirements for Funding (A) Eligible Activities (1)(a)(3)]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
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Describe Basis for Conclusion:

4.

Do the program participant records indicate that participants who are receiving rental assistance are being evaluated and certified for eligibility every three months? [HPRP Notice Section IV. Requirements for Funding (A) Eligible Activities (1)(a)]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
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Describe Basis for Conclusion:

5.

Do the program participants' files document the delivery of HPRP-eligible financial assistance and supportive services? [HPRP Notice Section IV. Requirements for Funding (A) Eligible Activities]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
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Describe Basis for Conclusion:

6.

Homelessness Prevention and Rapid Re-Housing Program (HPRP)

<p>For program participants receiving motel or hotel vouchers, do their files document the lack of appropriate shelter beds available to house the individual or homeless family, that a subsequent residence was identified before placing the program participant into the motel or hotel, <u>and</u> that the voucher assistance did not exceed 30 days? (Note: If a domestic violence provider serves the program participant, it is not required that a subsequent residence be identified before placement of the household in a motel or hotel.) [HPRP Notice Section IV. Requirements for Funding (A) Eligible Activities (5)(e)]</p>	<table border="0"> <tr> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td>Yes</td> <td>No</td> <td>N/A</td> </tr> </table>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Yes	No	N/A
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>					
Yes	No	N/A					

Describe Basis for Conclusion:

7.

<p>For participants receiving moving assistance, is there evidence that the moving costs were reasonable and, if storage fees were paid, that they were limited to no more than three months? [HPRP Notice Section IV. Requirements for Funding (A) Eligible Activities (5)(d)]</p>	<table border="0"> <tr> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td>Yes</td> <td>No</td> <td>N/A</td> </tr> </table>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Yes	No	N/A
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>					
Yes	No	N/A					

Describe Basis for Conclusion:

8.

<p>For participants receiving legal assistance, is there evidence that the legal services were only related to tenant/landlord matters or housing issues and did not involve any mortgage-related issues? [HPRP Notice Section IV. Requirements for Funding (A) Eligible Activities (2)(d)]</p>	<table border="0"> <tr> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td>Yes</td> <td>No</td> <td>N/A</td> </tr> </table>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Yes	No	N/A
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>					
Yes	No	N/A					

Describe Basis for Conclusion:

9.

Homelessness Prevention and Rapid Re-housing Program

<p>Is there evidence in the participants' files to indicate that the participants are not also receiving another federal, state or local housing subsidy for the same HPRP cost type and period of time? [HPRP Notice Section IV. Requirements for Funding (A) Eligible Activities (5)]</p>	<p><input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A</p>
<p>Describe Basis for Conclusion:</p>	

10.

<p>Is there evidence that no HPRP funds are being used for operating costs or to assist persons residing in transitional housing? [HPRP Notice Section IV. Requirements for Funding (A) Eligible Activities (1)(a)(5)]</p>	<p><input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A</p>
<p>Describe Basis for Conclusion:</p>	

Instructions: This is a mandatory review for all HPRP projects. This Exhibit is designed to review the eligibility documentation of program participants that the grantee or subgrantees conducted to determine whether or not they meet all of the eligibility criteria upon entry in an HPRP-funded project. HUD reviewers should:

- Request a listing of program participants (current and past), including their entry dates, from the selected projects.

Homelessness Prevention and Rapid Re-Housing Program (HPRP)

- Choose randomly from this list and then request the selected program participant files to complete your review.

File selection should also include a cross-section of each homeless prevention assistance and/or rapid re-housing assistance activity identified in the approved Consolidated Plan’s Annual Action Plan HPRP Substantial Amendment, the Integrated Disbursement and Information System (IDIS) completion screens, and the Homeless Management Information System (HMIS). Additional guidance review regarding File Selection and Sampling can be found in Section 8-3.C in the introductory text to this Chapter. Files selected for this review may concurrently be used to answer questions in Exhibit 8-2, “Guide for Review of HPRP-Assisted Housing,” and Exhibit 8-3, “Guide for Review of HPRP Financial Assistance and Housing Relocation and Stabilization Services.”

Questions:

1.

Does a review of the selected program participant files adequately document that the individuals or families had at least one initial consultation with a case manager or other authorized representative who determined the appropriate type of assistance to meet their needs prior to being accepted into the project? [HPRP Notice – Section IV. Requirements for Funding (D) Eligible Program Participants (2) Requirements for all Program Participants (1)]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
Describe Basis for Conclusion: 	

2.

Does a review of the program participant files adequately document that all individuals or families served are at or below 50 percent of the Area Median Income (AMI) upon entry into the project? [HPRP Notice – Section IV. Requirements for Funding (D). Eligible Program Participants (2) Requirements for all Program Participants (2)]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
Describe Basis for Conclusion: 	

3.

Homelessness Prevention and Rapid Re-housing Program

Does a review of the program participant files adequately document that the individuals or families were either homeless <u>or</u> at risk of losing their housing and were (1) without appropriate subsequent housing options <i>and</i> (2) without financial resources and support networks needed to obtain immediate housing or remain in its existing housing? [HPRP Notice – Section IV. Requirements for Funding (D). Eligible Program Participants (2) Requirements for all Program Participants (3)]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
Describe Basis for Conclusion:	

Homelessness Prevention and Rapid Re-Housing Program (HPRP)

Instructions: This Exhibit is designed to evaluate the HPRP grantee’s compliance with other applicable Federal requirements. It is divided into 4 sections: Drug-Free Workplace; Lobbying Restrictions; Compliance with Non-Discrimination, Section 504 of the Rehabilitation Act of 1973, and Other Equal Opportunity Requirements; and Lead Hazard Abatement Requirements. Note, however, that the provisions of the Davis-Bacon Act do not apply to the HPRP program. In addition, activities associated with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (acquisition, rehabilitation, demolition, displacement or relocation) are ineligible HPRP activities. According to 24 CFR 50.19(c) (1) of the National Environmental Policy Act all, HPRP are categorically excluded.

For certain requirements, a reference is made to other Exhibits or Chapters in this Handbook. If other Exhibits are used to monitor these areas, only the conclusion(s) should be noted here with a cross-reference to the supporting Exhibit. If the requirement does not pertain to the HPRP grantee, mark “N/A.” If the area is not covered during this monitoring, write under the applicable “Describe Basis for Conclusion” box: “Not covered due to _____ (*provide reason*).” If compliance monitoring for the areas below has been conducted in the past 12 months, under either the HPRP or other HUD programs, it is not necessary to review these areas again unless the last risk analysis results or subsequent information raise questions or concerns.

Questions:

A. DRUG-FREE WORKPLACE

1.

Does the HPRP grantee have a drug-free workplace statement per the requirements of 24 CFR 21.200? [HPRP Notice, Section VII. Other Federal Requirements (A) (J) and 24 CFR 91.225(a)(3) or 24 CFR 91.325(a)(3)]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
Describe Basis for Conclusion:	

2.

If the requirements of the Drug-Free Workplace actions were monitored, is the HPRP grantee in compliance? [HPRP Notice, Section VII. Other Federal Requirements (A) (J) and 24 CFR 91.225(a)(3) for units of local government or 24 CFR 91.325(a)(3) for states]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
Describe Basis for Conclusion:	

B. LOBBYING RESTRICTIONS

Homelessness Prevention and Rapid Re-housing Program

3.

a. Does the HPRP grantee conduct lobbying?	<input type="checkbox"/> <input type="checkbox"/> Yes No
Describe Basis for Conclusion:	

b. If the answer to “a” above is “yes,” has the grantee correctly filed a certification and disclosure form? [Notice, Section VII. Other Federal Requirements (A) (J) and 24 CFR 24 CFR 91.225(a)(4) for units of local government or 24 CFR 91.325(a)(4) for states]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
Describe Basis for Conclusion:	

C. COMPLIANCE WITH NON-DISCRIMINATION, SECTION 504 OF THE REHABILITATION ACT OF 1973, AND OTHER EQUAL OPPORTUNITY REQUIREMENTS

4.

If this area was reviewed, was the HPRP grantee determined to be in compliance with the applicable requirements? (Use pertinent Exhibits in Chapter 22 and note conclusions below.) [HPRP Notice, Section VII. Other Federal Requirements (D)]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
Describe Basis for Conclusion:	

D. LEAD HAZARD ABATEMENT REQUIREMENTS

Homelessness Prevention and Rapid Re-Housing Program (HPRP)

5.

For all HPRP-rental assisted units constructed before 1978 where a pregnant woman or a family with a child under the age of six years was identified, was a visual assessment for lead-based paint conducted? [HPRP Notice, Section VII. Other Federal Requirements (F)]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
Describe Basis for Conclusion:	

6.

For all HPRP-rental assisted units constructed before 1978 where a pregnant woman or a family with a child under the age of six years was identified and where lead-based paint was identified, were the proper regulations followed for abatement? [HPRP Notice, Section VII. Other Federal Requirements (F)]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
Describe Basis for Conclusion:	