

# BOSTON HPRP

3/29/2010

## Program Guidance

This document provides program guidance to sub-grantees of the City of Boston Department of Neighborhood Development to assist them in the implementation of the new HUD Homelessness Prevention and Rapid Re-Housing Program (HPRP). Sub-grantees will use this guidance to ensure that their grant funded activities reflects national and local goals and specifications.

# Boston HPRP

## PROGRAM GUIDANCE

### ABOUT THIS TOOL

This tool provides guidance to sub-grantees in the City of Boston that are contracted by the Department of Neighborhood Development (DND) to implement HUD's new Homelessness Prevention and Rapid Re-Housing Program (HPRP). This guidance will assist grantees in aligning their services with the principles and research which informed HUD's development of the HPRP program and ensure the grantees' compliance with HUD's rules and local policy. This guidance will also increase the likelihood that Boston's HPRP program is implemented with optimal chances of success. The audience for this document is the group of non-profit community based organizations with whom DND has developed sub-grant agreements to execute the City's HPRP grant. These organizations should use this guidance to educate all staff associated with HPRP.

### TWO HPRP PROJECT AREAS

The HPRP program consists of two general project areas. These are:

#### 1. HPRP Homelessness Prevention

An array of services and financial assistance designed to protect at-risk households from falling into homelessness or to assist such households in bypassing ("being diverted from") emergency shelter.

#### 2. HPRP Rapid Re-Housing

An array of services and financial assistance used to help households rapidly exit emergency shelter, find housing, and quickly reestablish residential stability such that they can step down from assistance.

### TWO HPRP COST AREAS

Within both of the two HPRP project areas described above, there are two program cost areas. These are:

#### 1. HPRP Financial Assistance

Direct financial assistance used to prevent homelessness, bypass shelter by assisting with new housing arrangements, facilitate rapid exits from shelter, and/or stabilize new housing arrangements.

#### 2. HPRP Housing and Stabilization Services

Support services provided to households to assist them in either maintaining housing, relocating to new housing, exiting emergency shelter, finding housing after shelter, and /or establishing residential stability.

## PROGRAM GOALS

The HPRP program in Boston has clear goals that will help sub-grantees and staff members orient their efforts when first implementing the program and, mid-stream, when bringing the program to full scale. Over time, as questions requiring the judgment of the HPRP sub-grantees to chose who, when, and how long to help households with HPRP resources, these goals should be used in that decision making. Boston's HPRP goals are:

### Prevention Goals

1. Prevent homelessness among at-risk households by assisting them to preserve housing arrangements
2. Divert at-risk households around emergency shelter system by quickly assisting them into other housing
3. Stem rising tide of homelessness anticipated citywide in Boston for the next few years
4. Lessen the demand for emergency shelter and other homeless support services
5. Avoid the myriad social cost consequences when homelessness occurs for a household
6. Solve homelessness in those who would lose housing but for receiving this assistance
7. Serve maximum number of households by assisting each with the minimal assistance required
8. Make largest possible impact by operating with maximum efficiency and cost effectiveness
9. Approach problems faced by households with a flexible, proactive approach to finding solutions
10. Assist households in linking with follow-up supports to ensure long term stabilization

### Rapid Re-Housing Goals

1. Rapidly re-house homeless households using cost effective temporary assistance
2. Shorten shelter stays and reduce shelter populations - decreasing pressures on homeless system
3. Make largest possible impact by operating with optimal efficiency and cost effectiveness
4. Help the maximum number of people by administering least assistance needed per household
5. Rapid Re-Housing: assist those households that can step-up and off temporary assistance
6. Limit interventions to solving homelessness/housing stability issues not all poverty issues
7. Approach problems faced by households with a flexible, proactive approach to finding solutions
8. Assist households in linking with follow-up supports to ensure long term stabilization

## LIMITATIONS

The HPRP program in Boston has several necessary limitations. Knowing these limits and operating within their margins will assist the non-profit HPRP grantees and their staff in making sound judgments about how and when to use HPRP resources.

### How to Adhere to Limitations

1. Limit the use of HPRP to those households that would very likely become homeless "but for" the help.
2. Focus HPRP Rapid Re-Housing on only those households that can ultimately step-down from HPRP.
3. Recognize that HPRP has a narrow focus on housing preservation that does not extend to all social, health, and economic issues and obstacles that low - income households typically face.
4. End HPRP assistance when housing issues are resolved.
5. Use staff supervisors to judge when to have households step down from HPRP assistance.
6. Focus on extending the reach of HPRP assistance to a wide swath of vulnerable households.

## SYSTEMS TRANSFORMATION

Nationally, the HPRP program is intended to facilitate systems change within the overall arena of homeless services and homeless housing. It presents a unique opportunity for Boston to transform the local homeless system into one that places greater emphasis on housing stability and integrates prevention and rapid re-housing with existing mainstream resources.

If successful, the HPRP program in Boston should reduce the City's current reliance on emergency shelter as the primary intervention used to help most households falling into homelessness. It should also speed up the pace at which households move through and out of the shelter system. These results will be achieved if HPRP's role is established clearly within the wider homeless system from the outset.

### HPRP Role in Wider Homeless System

1. HPRP is a new intervention offering previously untried options that do not now exist in Boston
2. All HPRP providers work in collaboration to deliver one coordinated HPRP program
3. Boston's HPRP program is implemented in coordination with the MA statewide HPRP program
4. Boston's HPRP helps households capitalize upon existing mainstream resources
5. Boston's HPRP is coordinated with other agencies making up our homeless continuum of care
6. Outcomes of Boston's HPRP are reviewed by governing bodies that evaluate our wider system
7. Resource information flows between HPRP sub-grantees and the wider homeless service continuum

## MULTI-AGENCY DESIGN

The Boston HPRP program is designed to involve multiple non-profit agencies. There is one single non-profit agency, the Metro Boston Housing Partnership (MBHP), responsible for administering all HPRP financial assistance. This function includes confirming completeness of *HPRP Applications for Financial Assistance*, assessing rent reasonableness, performing unit inspections on apartments to be assisted by rental assistance, confirming lead inspection certifications, and issuing checks. There are 15 other non-profit agencies contracted to perform Housing and Stabilization Services as a form of Homelessness Prevention or in conjunction with Rapid Re-Housing. Some of these agencies will be focused exclusively on either Prevention or Rapid Re-Housing whereas others will span both of these project areas.

### Multi-agency Design Features

1. All HPRP providers work in collaboration to deliver one coordinated HPRP program
2. Boston's HPRP program is implemented in coordination with the MA statewide HPRP program
3. Boston's HPRP helps households capitalize upon existing mainstream resources
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## LIST OF SUB-GRANTEES

There are 16 sub-grantee organizations comprising Boston's HPRP program. These agencies are:

### Boston's HPRP Prevention Sub-grantees

1. AIDS Action Committee
2. Action for Boston Community Development
3. Bay Cover Human Services
4. Catholic Charities
5. Greater Boston Legal Services
6. Homestart
7. Home for Little Wonderers
8. Just-a-Start
9. Kit Clark Senior Services
10. MA Coalition for the Homeless
11. Metro Boston Housing Partnership
12. Project Hope
13. Span Inc.
14. Travelers Aid Family Services
15. Urban Edge
16. Victory Programs

## AGENCY COLLABORATION

Collaboration between all HPRP sub-grantees in Boston will be essential to the program's success. All sub-grantees will use systems for active collaboration on an ongoing basis.

### Collaboration Systems

1. Referrals from the MBHP Homelessness Prevention Hotline to the HPRP sub-grantees.
2. Use of the *Boston HPRP Sub-grantee Directory* to make cross-referrals.
3. Identification of an *HPRPP Primary Contact* within each sub-grantee agency.
4. Peer to peer sub-grantee exchange of assistance, lessons learned, and recommendations.
5. Ongoing collaboration facilitated by the local technical assistance provider, Victory Programs.

## BASELINE ELIGIBILITY

All households seeking assistance from HPRP must meet a baseline of eligibility. This criterion is defined clearly by HUD. For all households deemed eligible, documentation supporting their status must be maintained on file by the HPRP non-profit grantee.

### HUD Baseline Criteria

1. Must willingly engage with an Initial Assessment with a Case Manager for a consultation and assessment to determine HPRP eligibility and be referred to appropriate HPRP or related services:
2. Must be a household at or below 50 percent of Area Median Income (AMI)
3. Must be at risk of homelessness (see Appendix for definition) or homeless (see Appendix for definition) and:
  - a. Have no appropriate subsequent housing options identified
  - b. Lack financial resources and support needed to obtain new housing or remain in existing housing.

### City of Boston Residency Requirement

1. Households must live or work or have an offer of employment in the City of Boston
2. OR household must be displaced previously from the City of Boston.

### Income Eligibility for Unrelated Households

1. In the event that two unrelated households are joint parties on a lease, eligibility will be determined by the total of their incomes.

## PRIORITY HOUSEHOLDS FOR PREVENTION

In accordance with HUD policy, each city across the U.S. determines for itself the households that will be most highly prioritized for Homelessness Prevention assistance using HPRP. In Boston, this prioritization is to be made in accordance with a system of three tiers. Tier One households are the primary priority Tier Two households are of secondary priority, and Tier Three households are to be referred to mainstream resources.

### Tier Definitions

1. Tier One - Extreme Emergency:
  - a. Facing *Imminent Eviction* (as per guidance below) **and** *Verification of Household Need* is determined (as per guidance below). Also paying > 50% of income to rent.
  - b. In housing condemned by a public agency.
  - c. Experienced sudden and significant loss of income (such as caused by job loss)
  - d. Being displaced due to foreclosure of rental property
  - e. Necessity for move-out due to recent traumatic life event (such as HIV/AIDS related illness)
  - f. Eviction from public or assisted housing
  - g. Recently aged out of foster care and precariously housed
2. Tier Two – Moderate Emergency:
  - a. Sudden increase in utility costs
  - b. Very low income: 30% of AMI or less
  - c. Significant amount of medical debt
  - d. High overcrowding
3. Tier Three – First Consider Referral to Other Resources:
  - a. Homeless in last 12 months
  - b. Young head of household
  - c. Current or past involvement with child welfare
  - d. Mental health or substance abuse
  - e. Physical disability

## Imminent Eviction Definition

1. Client is in receipt of a 14-day, 30-day, 7-day, or 72-hour notice to vacate, unless the provider knows, from prior dealings with a particular institution or owner, that no action is likely to be taken based on such notice and that it is merely being used as a payment reminder.<sup>1</sup> Private conference notices will not be sufficient. Receipt of notices later in the process—such as a summary process summons and complaint, or a motion to issue execution, etc.—certainly would qualify, but it is not necessary for cases to have gotten to that stage to qualify for help.
2. Client is in receipt of a notice of imminent termination of utility service (gas, electricity, water & sewer services), including a notice received by tenants where service could be terminated for owner nonpayment and tenants can continue service by paying a projected bill.
3. Client is in receipt of a notice of proposed termination of subsidy. Normally this is a notice that informs the client of the right to request an informal hearing. Receipt of notices later in the process—such as a hearing decision, or a notice of actual termination because of failure to request a timely hearing—certainly would qualify, but it is not necessary for cases to have gotten to that stage to qualify for help.

## Verification of Household Need Methods

In order to verify the various need(s) of each household it is helpful to request and review additional paperwork. This will help assess the services that must be delivered in combination with the financial assistance that is being provided. Here are examples of documents that can verify a household's current and ongoing service needs:

1. Rent Ledger – review the household's rental payment history for the past 12 months. Consider the following:
  - a. When is rent typically paid?
  - b. Is there a pattern of late payments or was this a one-time occurrence?
  - c. Is rent typically paid in full or piecemeal?
  - d. Is the time of the arrearage consistent with the client's explanation of why they are behind? (for example, is the time of the arrearage fit with when they were out of work)
  - e. Would the client benefit from a negotiated rent timeline? e.g. Request and negotiate with landlord that rent be due on the 10th of each month as this is when tenant is paid.
2. Utility bills – review the household's bills and payments for the past 12 months. Consider the following:
  - a. When are utility bills typically paid?
  - b. Is there a pattern of late payments or a one-time period of missed payments?
    - a. Are utility bills usually paid in full or piecemeal?
    - b. Do the bills appear reasonable considering the size of the unit?
  - c. Would the client benefit from the Arrearage Management Program?
  - d. Is the client eligible for and receiving any shut-off protections?
  - e. Is the client eligible for and receiving the low-income discount (signified by "Rate 2" or "Rate 4")?

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<sup>1</sup> While 14-day notices to quit are the most common ones for nonpayment of rent, on occasion the eviction may be for chronic late payment of rent, or there may be HOME funding or a lease that requires a 30-day notice for nonpayment of rent. "Cause" cases typically require a 30-day notice to quit, but for lodging house units, as well as tenants with written private market leases, a 7-day notice may be permitted. 72-hour notices are typically given where the owner claims that the person is a tenant at sufferance without rights to remain in the unit (such as a former homeowner who has been foreclosed upon). It's important to get to these cases before the court stage, since there are rights to cure in nonpayment evictions under G.L. c. 186, § 11 and 12, but if cure comes too late (i.e., right before the answer date for a summary process complaint), the tenant will also be responsible to pay court entry fees and constable service costs—typically anywhere from \$180 to \$240.

3. Employment related documents – Review documents related to the client's employment status and history, e.g. Letter of job termination, Unemployment Insurance stubs, etc. Consider the following:
  - a. Was client at fault for termination or was it a lay off?
  - b. How long has the client been out of work?
  - c. What type of work history does the client have?
  - d. Are there training programs or classes that could boost the client's employability?
4. Miscellaneous bills – Review the household's monthly expenses. Consider the following:
  - a. Is the household spending beyond their means?
  - b. Are there any expenses that can decrease or be cut altogether?
  - c. Are there any large bills for which a more reasonable repayment plan and/or interest rate can be negotiated?
  - d. Would the household benefit from credit and budget counseling?

## OUTREACH FOR PREVENTION

According to HUD policy, each city across the U.S. determines for itself how it will find households most in need of HPRP Prevention. In Boston, the HPRP program will be seeking to identify households who are both HPRP eligible and fit the Tier One or Tier Two category of prioritization. Towards this end, the City of Boston will coordinate efforts to engage and educate a wide array of community based contacts that can assist in identifying HPRP prioritized households.

### Coordinated Prevention Outreach Methods

1. HPRP presentations at meetings and consortiums of homeless providers.
2. Electronic distribution of HPRP outreach materials to local social service providers.
3. Engagement of local Housing Court contacts.
4. Engagement of local consortiums of landlords/property managers.
5. Engagement of Boston Public Schools school-based homeless liaisons.
6. Engagement of food banks, soup kitchens, and fuel assistance providers.
7. Engagement of mainstream unemployment and job search service contacts.
8. Engagement of public libraries.
9. Engagement of church leaders, synagogues, mosques, and other faith based organizations.

## OUTREACH FOR RAPID RE-HOUSING

According to HUD policy, each city across the U.S. determines for itself how it will find households to participate in Rapid Re-Housing. In Boston, finding such households will be carried out in partnership with the Boston Office of the MA Department of Transitional Assistance (DTA).

## HOMELESSNESS PREVENTION PRACTICES

According to HUD policy, each city across the U.S. determines for itself the exact prevention practices to be used in HPRP. In Boston, interventions will be those with a proven track record as national best practices:

### Prevention Practices

1. De-escalation of emotional crisis common in households at-risk
2. Concrete planning and problem solving with achievable goals
3. Landlord-tenant mediation to resolve disputes jeopardizing housing
4. Legal assistance used to help tenants maintain or stabilize housing arrangements
5. Home visits to engage in problem solving and identify needed interventions
6. Family-of-origin based mediation to resolve disputes jeopardizing housing
7. Review of expenses and creation of household budget to manage expenses
8. Communications with landlord to encourage flexibility and adjusted timeframes for evictions
9. Negotiations with property owner to modify rents, accept reduced back rent owed, etc.
10. Review of options for public benefit access – TANF, Food Stamps, SSI/SSDI
11. Assistance in applying for public benefits
12. Direct financial assistance provided to pay rent arrears or pay rent forward
13. Direct financial assistance to pay utility arrears so as to maintain housing
14. Financial literacy education
15. Evaluation of options for re-locating to more affordable housing if tenancy is unworkable
16. Housing search and planning for relocation to new housing
17. Links to public resources provided through public agencies

## HOUSING AND STABILIZATION SERVICES POLICY

According to HUD's rules, HPRP Housing and Stabilization Services may be used as a form of Homelessness Prevention or may be provided in conjunction with Rapid Re-Housing. In both applications, certain guidelines for providing these services apply.

### Eligible Ways to Provide Stabilization Services<sup>2</sup>

1. Outreach and engagement
2. Case management
3. Legal services
4. Housing search and placement

### Ways Not to Apply Stabilization Services

1. Replicate existing services available in the community
2. Replicate mainstream resources

## FINANCIAL ASSISTANCE GENERAL POLICY

According to HUD rules, HPRP financial assistance may be issued as a form of Homelessness Prevention or in conjunction with Rapid Re-Housing. In general, HPRP financial assistance cannot be provided to eligible individuals or families for the same period of time and for the same cost types that are being provided

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<sup>2</sup> Note that HUD also allows Credit Repair as an eligible service. However, this will not be a component of the Boston HPRP program.

through another federal, state, or local housing subsidy program. The following are eligible and ineligible uses of HPRP financial assistance.

### Eligible Uses of Financial Assistance

1. Rental deposits (In Boston, this will constitute one month's rent)
2. Rental assistance up to 18 months
3. Rent arrearages up to 6 months. (Is included in the cap of 18 months rental assistance)
4. Utility deposits (not required in Boston)
5. Utility payments up to 18 months
6. Utility arrears up to 6 months (Is included in the cap of 18 months utility payments)
7. Moving cost assistance
8. Staffing/operating costs associated with implementing eligible financial assistance

### Ineligible uses of Financial Assistance

1. Bad debt: credit card, car payment, medical expense, phone payment, cable bill
2. Fees for rental applications
3. Pet deposits on rental units
4. Court costs
5. Mortgage Costs
6. Legal or other fees related to retaining homeowner housing
7. Construction rehabilitation
8. Credit card bills, arrears, loans or consumer debt payments
9. Car repair, transportation costs, travel costs
10. Food
11. Medical or dental care and medicines
12. Clothing, grooming, pet care, entertainment
13. Work or education related materials
14. Home furnishings

### Rules for Financial Assistance Payments

1. MBHP will only make payments to third parties – landlords, utilities, etc.
2. MBHP will not make financial assistance payments directly to assisted households.
3. Landlords accepting rental assistance checks must supply Tax ID # and W-9 Form.
4. Landlords must agree to have check made as a direct bank deposit
5. No household will receive more than 18 months total of rent assistance or utility assistance.
6. No household will receive more than 6 months of rent arrears and utility arrears
7. Funds used for ineligible activities will be returned to HUD.
8. The HPRP Lead Paint Requirements applies to all households seeking any form of financial assistance.

## LEAD PAINT REQUIREMENT

According to HUD rules, an *HPRP Lead-based Paint Requirement* will apply to all households seeking any form of HPRP financial assistance who have a child under the age of 6 years old and live in or will be moving into a unit built before 1978 (the vast majority of the rental housing stock in Boston). This includes any household seeking rent assistance, rental arrears, utility assistance, utility arrears, security deposits, and moving costs. Furthermore, it applies regardless of whether a household is remaining in an existing unit or moving to a new

unit. HPRP sub-grantees must complete the *HPRP Lead Screening Worksheet* for all households where the Lead-Based Paint Requirement applies.

### Exceptions to lead Paint Requirement

1. No child under 6 years old.
2. Building built after 1978.
3. 0 bedroom or SRO unit

## RENTAL ASSISTANCE

According to HUD rules, rental assistance may be offered as a form of HPRP Homelessness Prevention and/or as a mechanism for Rapid Re-Housing. In Boston, it will be used in both areas. In both applications, certain standardized calculations apply to all households receiving HPRP rental assistance.

### Rental Assistance Guidelines

1. A lease must be in place and the assisted household must be on the lease in order to use HPRP for rental assistance or rent arrears.
2. Up to 18 months of rental assistance will be provided – with reassessments required every 3 months.
3. Rental assistance will not exceed the local FMR.
4. Determinations as to the number of months of assistance will be made on a case by case basis.
5. The HPRP rent assistance contribution will be a standard income-based subsidy whereby tenants contribute 30 percent of their income towards rent.
6. Rental arrears may be paid regardless of the timeframe of when they were incurred provided the existence of the arrears prevents eligible participants from obtaining housing and it is likely the participant will be able to maintain the housing.
7. Rental arrears may be paid to pay off a previous landlord if eliminating that debt will be a catalyst to helping the household begin a new rental arrangement.
8. Late fees associated with rent arrears may be paid with HPRP as long as the payment enables the household to remain housed or become re-housed.

### Limits on Rental Assistance

1. Rental assistance will not exceed the local FMR.
2. An assisted property may not be owned by the grantee itself, sub-grantee or the parent, subsidiary or affiliated organization of the grant recipient.
3. There is an 18- month limit on rental assistance inclusive of any rent arrearage payments (for example, after paying 6 months' rent arrearages, the household is eligible for only 12 more months of rental assistance).
4. Sub-grantees must re-certify eligibility for rental assistance at least once every three months. (For example, a household having received 3 months of short-term rental assistance must be reevaluated at that juncture to receive up to 15 additional months).
5. Participants using rental assistance when they are moving into new housing must meet habitability standards
6. HPRP participants receiving rental assistance may not be charged program fees.
7. HPRP may only be used on rentals that meet rent reasonableness standards.
8. Units must comply with federal rules related to rent reasonableness.

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## Households Receiving Other Forms of Rental Assistance

1. If a participant is receiving rental assistance under another program (either a full or partial subsidy), HPRP funds may not be used for rental assistance during that same time period. HUD expects the Public Housing Agency, or the agency administering the other housing subsidy program (e.g., HOME, HOPWA), to recalculate the tenant share of the rent payment when there has been a decrease in household income so that the housing remains affordable for the tenant.
2. 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.
3. Tax credit projects could be eligible to house HPRP households because the rental subsidy received from a tax credit property is not considered the same cost type as direct rental assistance.

### **Additional Guidance Language regarding assisting Subsidized Tenants**

Subsidized tenants are eligible for rental arrearage assistance from HPRP of no longer than six months if the reason for the arrearage is directly attributable to one of the following:

- A disability, including a mental health impairment, that caused the tenant to be unable to manage his or her finances coupled with a plan for vendor payments, a representative payee, and/or ongoing budgeting assistance from the HPRP provider;
- A one-time compelling and unforeseen expense such as funeral expenses for an immediate family member, medical expenses not covered by insurance, or repairs to an automobile necessary for commuting to work;
- A sudden decrease in income that does not trigger an adjustment of subsidized rent such a short-term unpaid medical leave from work;
- A time lag between tenant compliance with notifying the housing provider of a change in income and the rent adjustment being made by the housing provider.

Examples of circumstances that do not meet this eligibility requirement include:

- Payment of school fees or tuition for a child;
- Expenses associated with supporting or assisting family members or friends;

- Failure to properly or timely notify the housing provider of a change in income;
- Prioritizing other bills, such as credit card debt, over rent.

## SECURITY DEPOSITS

According to HUD rules, security deposits may be offered in conjunction with Rapid Re-Housing.

### Security Deposit Guidelines

1. A lease must be in place and the household must be on the lease to use HPRP for a security deposit.
2. Boston's HPRP program will provide up to two month's rent in advance (first month's rent plus security deposit). The security deposit may not exceed one month's rent.
3. Security and utility deposit assistance does not count toward the 18-months limit on rental assistance.
4. If an assisted household moves from a unit where HPRP paid the security deposit, the household will be allowed to keep the deposit to use towards the next rental.
5. Households moving into public or assisted housing are eligible to receive HPRP security deposits.

## UTILITY PAYMENT

According to HUD rules, utility arrears, and utility deposits may be offered in conjunction with HPRP Prevention and in conjunction with Rapid Re-Housing.

### Utility Payment Guidelines

1. HPRP may pay up to 18 months of utility payments including up to 6 months of arrears.
2. HPRP utility payments are capped in accordance with the *Boston Housing Authority Utility Chart*.
3. Homeowners may receive assistance with utility arrearage or payment but not a deposit.
4. HPRP may pay a utility arrearage, utility payment, or utility deposit.
5. Arrearage payments may be made up to 6 months regardless of when they were incurred provided that the existence of the arrears prevents the household from obtaining housing and it is likely that the household will be maintain housing going forward.
6. Assisted household must have an account in their name with a utility company or proof of responsibility to make utility payments (such as canceled checks or receipts from the utility company in his/her name).
7. Eligible utilities include: heat, electricity, water, sewer, and garbage collection.
8. Late fees associated with utility arrears may be paid with HPRP as long as the payment enables the household to remain housed or become re-housed.
9. Telephone and cable services are not eligible utilities.

## MOVING COSTS

According to HUD rules, moving cost financial assistance may be offered in conjunction with Prevention and in conjunction with Rapid Re-Housing.

## Moving Cost Payment Guidelines

1. HPRP financial assistance may be used for moving costs up to the equivalent of one month's rent.
2. Eligible costs include truck rental, hiring a moving company, and short term (up to 3 months) storage.
3. Moving cost assistance should be considered for households exiting shelter and for households where the current housing arrangement is not tenable for the long term.
4. There is no cap on moving cost expenses.
5. For households seeking moving cost assistance to relocate a significant distance from one part of the state to another or to move out of state, approval must be obtained from the City of Boston DND.

## LEGAL ASSISTANCE

According to HUD rules, legal assistance may be offered as a form of HPRP Homelessness Prevention and/or as a mechanism for Rapid Re-Housing. Eligible legal services may include assisting program participants with legal advice and representation in administrative or court proceedings related to tenant/landlord matters or housing issues. Legal assistance related to mortgages is not eligible.

## HOMEOWNERS

Homeowners are ineligible to receive financial assistance or legal assistance related to a foreclosure or mortgage. However, homeowners are eligible for some HPRP services.

### Eligible to Homeowners

1. Housing and Stabilization Services
2. Utility arrears and payments but not deposits
3. Moving costs to relocate to a new unit
4. If in foreclosure, may receive rental assistance in a new rental unit

## COMMON ASSESSMENTS

According to HUD rules, it is required that all recipients of HPRP assistance participate in a uniform process for evaluating eligibility and targeting the assistance. In Boston, this procedure will be carried out by the HPRP sub-grantees using the *Boston HPRP Common Assessment Tool*. The *Boston HPRP Common Assessment Tool* assesses issues related to housing barriers and the extent of a household's vulnerability to homelessness. The tool will be used by sub-grantees to assess households for eligibility and to determine what form of HPRP assistance is most likely to prevent or resolve homelessness.

## CASELOAD

In providing Housing and Stabilization Services for HPRP households, Boston's sub-grantees will use the caseload ratio indicated in their respective proposals to the City of Boston. In the future, a standard citywide HPRP caseload may be developed.

## CULTURAL COMPETENCE

Boston's HPRP sub-grantees will use cultural competence to deliver both the services and financial assistance elements of the program. For non-English speakers, the HPRP sub-grantees will provide bi-lingual assistance when needed - either via in-house language capacity or through collaborations. In addition, the HPRP program will be delivered with sensitivity and knowledge for the following variations in cultural practice:

### HPRP Cultural Competencies

1. Values related to money – spending, priorities, savings, sending money to family members
2. Feelings related to asking for help including shame and pride
3. Understanding of tenant-landlord relationships
4. Perceptions of healthy practices and lifestyle
5. Use of support systems such as family and community
6. Trauma related to refugee and immigrant experiences
7. Way that crisis, distress, and health issues are understood
8. Connections with families of similar background

## 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. Boston sub-grantees 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.

## NONDISCRIMINATION/EQUAL OPPORTUNITY

As stated in section IV.E.8., Boston HPRP sub-grantees 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.

## TERMINATIONS FROM ASSISTANCE

Boston HPRP sub-grantee may terminate assistance to a household that violates program requirements. Furthermore, sub-grantees may resume assistance to a household whose assistance was previously terminated. In terminating assistance to a household, the sub-grantee must provide a formal process that recognizes the rights of individuals receiving assistance to due process of law.

### Boston HPRP Termination Process

1. Written notice to the household containing a clear statement of the reasons for termination
2. A review of the decision, in which the household 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 household.

## REPORTING

HUD requires that HPRP grantees and sub-grantees report client-level data into the Boston's HMIS. As with all Recovery Act programs, HPRP will have stringent and transparent accountability reporting and HUD will post the reports on [www.recovery.gov](http://www.recovery.gov).

Boston HPRP grantees will be required to submit an Initial Performance Report one month after the program starts, Quarterly Reports, and an Annual Performance Report. Data elements for HPRP reporting will include homeless status and income, income source, non-cash benefits, destination at exit, financial assistance provided, and housing relocation and stabilization service provided.

### Quarterly Progress Reports

Reporting Period	Due Date
10/1/2009 – 12/31/2009	1/5/2010
1/1/2010 – 3/31/2010	4/5/2010
4/1/2010 – 6/30/2010	7/5/2010
7/1/2010 – 9/30/2010	10/5/2010
10/1/2010 – 12/31/2010	1/5/2011
1/1/2011 – 3/31/2011	4/5/2011
4/1/2011 – 6/30/2011	7/5/2011
7/1/2011 – 9/30/2011	10/5/2011
10/1/2011 – 12/31/2011	1/5/2012
1/1/2012 – 3/31/2012	4/5/2012
4/1/2012 – 6/30/2012	7/5/2012
7/1/2012 – 9/30/2012	10/5/2012

### Annual Progress Reports

Reporting Period	Due Date
10/1/2009 – 9/30/2010	11/15/2010
10/1/2010 – 9/30/2011	11/15/2011
10/1/2011 – 9/30/2012	11/15/2012

## APPENDIX

### Key Terms

*Homeless:* People who are:

- Sleeping in an emergency shelter
- Sleeping in place not meant for reasonable habitation
- Staying in a hospital or other institution for up to 180 days, but was on the street or shelter before
- Graduating or timing out of transitional housing
- Victim of domestic violence.

*At-risk of Homelessness:* Households that “would be homeless but for this assistance.” Includes people who are doubled up but only if housing is unstable (i.e. presence could cause an eviction). HUD requires grantees to maintain documentation of risk of homelessness but does not prescribe specific forms. Possible documentation may include:

- Eviction notice or writ of eviction
- Documentation of loss of income
- Pay stubs
- Letter of eviction from family member

*Short-Term and Medium-Term Rental Assistance.* Tenant-based rental assistance that can be used to allow households to remain in their existing rental units or to help them obtain and remain in rental units they select.

- Short-term rental assistance may not exceed actual rental costs accrued over a period of three months.
- Medium-term rental assistance may not exceed actual rental costs accrued over a period of four to 18 months.

*Rapid Re-Housing.* Financial assistance and housing relocation & stabilization services designed for currently homeless individuals and families where short or medium-term rental assistance and services are provided. Thereafter, households assume full responsibility for rent payments.

*Initial Assessment.* An initial evaluation to verify and document each HPRP participant’s eligibility for the program. This process is also an evaluation of appropriateness of specific HPRP supports for the household.

*Ongoing Eligibility Assessment.* An evaluation to be performed once every three months to verify and document the need for ongoing HPRP financial assistance. The process reassesses eligibility, reviews the appropriateness of specific HPRP interventions, and determines the advisability of a continuation of services.

*Rent Reasonableness.* A determination that the rent charged for a unit is reasonable in relation to the rents charged during the same time period for comparable units in the private unassisted market and is not be in excess of rents being charged by the owner during the same time period for comparable non-luxury unassisted units. See HUD’s worksheet on rent reasonableness.

## APPENDIX

### Guidance on HPRP Lead-Based Paint Requirement