

## Homeless Crisis Response Program (HCRP) Frequently Asked Questions

### 1 Application:

#### 1.1 Do Emergency Shelters submit separate applications? How are regional plans incorporated into shelter applications?

Yes, emergency shelters apply for their funds separately from the region. Exhibit 7a of the application requires shelter applicants to include a short narrative describing how the shelter plans to integrate the Regional Homeless Services Coordination Plan into their policies and procedures.

#### 1.2 How should regions divide the allocation among partner agencies?

Dividing the regional allocation among all counties in the region is up to the discretion of the lead grantee. However, the lead grantee should seek regional consensus, where possible, and should be able to provide rationalization for the decision. However, lead grantees are able to pass on a portion of the administrative allowance to partner agencies, but will carry the majority of the administrative burden. For this reason, it is acceptable for the lead grantee to maintain the majority of the available administrative funds. In regions with tenant-based supportive housing projects that would have applied for renewal this year, regions should consider granting administrative funds to these agencies to help ease the transition from being independently funded to part of the regional application.

#### 1.3 If a lead grantee is also submitting an emergency shelter application, are the applications submitted separately by that agency or does it need to be in the packet with the regional application?

If you are submitting both a region and a shelter application, you should include both applications in one binder, as you will receive one grant for the full amount. Only a few agencies fall into this category. If you need assistance in figuring out where everything should go, please contact the Supportive Housing Section.

#### 1.4 If an organization already has funding through a 2011 Homeless Assistance Grant Program grant, do they need to be included in the budget for the region?

Many regions include tenant-based supportive housing programs that are halfway through a two-year grant cycle. The Ohio Development Services Agency (ODSA) took these funds into account when determining the allocation amounts

for HCRP. How regional allocations are divided among partner agencies is at the discretion of the lead grantee in consultation with appropriate partners throughout the region. A region may choose to grant additional funds to projects already administering funds through these separate grants, but you only need to account for the portion of the funds coming from HCRP in your budget information.

### **1.5 What is the definition of administrative costs?**

Eligible administrative costs include those associated with accounting for the use of HCRP funds, preparing reports for submission to ODSA, obtaining program audits, and other costs related to administering the grant, as well as grantee and partner agency staff salaries associated with these administrative costs. Note that indirect costs (e.g., salaries, equipment, supplies) associated with one of the other three eligible activities must be charged directly to that activity.

## **2 Program Design:**

### **2.1 Can the region establish a maximum limit of assistance (for example, no client can receive more than 12 months of assistance)?**

Yes, the region may establish a maximum limit of assistance based on months of assistance or total dollar amount. However, the region should explain the rationale for doing so. Page 75980 of the Interim Emergency Solutions Grant in the Federal Register states:

*(c) Maximum amounts and periods of assistance.* The recipient may set a maximum dollar amount that a program participant may receive for each type of financial assistance under paragraph (a) of this section. The recipient may also set a maximum period for which a program participant may receive any of the types of assistance or services under this section. However, except for housing stability case management, the total period for which any program participant may receive the services under paragraph (b) of this section must not exceed 24 months during any three-year period. The limits on the assistance under this section apply to the total assistance an individual receives, either as an individual or as part of a family.

### **2.2 Can assistance be structured in a declining subsidy (for example 75 percent of rent for months 1-3; 50 percent months 4-6, etc.)?**

Yes, but make sure this is done on a case-by-case basis as each client's situation is unique. A progressive engagement strategy is particularly useful as it provides customized levels of assistance to clients in relation to their barriers to housing success so that the most expensive interventions go to households with the most barriers to housing success.

### **2.3 What level of case management can be provided? Are services restricted to Housing Stabilization services or can more comprehensive case management be provided under HCRP?**

Case management services are defined for the various activities in the Federal register (page 75977 for emergency shelter and 75979-80 for prevention and re-housing). These activities include, but are not limited to: centralized or coordinated intake, evaluation, counseling, service coordination, and development of a housing or service plan. Please consult the regulations for a complete and specific list of allowable activities on the HUD website listed below: [http://www.hudhre.info/documents/HEARTH\\_ESGInterimRule&ConPlanConformingAmendments.pdf](http://www.hudhre.info/documents/HEARTH_ESGInterimRule&ConPlanConformingAmendments.pdf)

### **2.4 Can HCRP services funds be used to pay for transportation to necessary appointments?**

Yes, page 75976 of the Interim Emergency Solutions Grant in the Federal Register states:

(5) *Transportation.* The transportation costs of travel by outreach workers, social workers, medical professionals, or other service providers are eligible, provided that this travel takes place during the provision of services eligible under this section. The costs of transporting unsheltered people to emergency shelters or other service facilities are also eligible. These costs include the following: (i) The cost of a program participant's travel on public transportation; (ii) If service workers use their own vehicles, mileage allowance for service workers to visit program participants; (iii) The cost of purchasing or leasing a vehicle for the recipient or sub-recipient in which staff transports program participants and/or staff serving program participants, and the cost of gas, insurance, taxes and maintenance for the vehicle; and (iv) The travel costs of recipient or sub-recipient staff to accompany or assist program participants to use public transportation.

### **2.5 Can registered sex offenders be served under HCRP?**

Yes, page 75988 of the Interim Emergency Solutions Grant in the Federal Register states:

§ 576.407 Other Federal requirements. (a) General. The requirements in 24 CFR part 5, subpart A are applicable, including the nondiscrimination and equal opportunity requirements at 24 CFR 5.105(a). Section 3 of the Housing and Urban Development Act of 1968, 12 U.S.C. 1701u, and implementing regulations at 24 CFR part 135 apply, except that homeless individuals have priority over other Section 3 residents in accordance with § 576.405(c).

## **2.6 Based on the rules released by HUD on the HEARTH Act, is any guidance on expected outcomes going to be provided by ODSA? Will ODSA provide base line data on outcomes for the counties?**

HUD has not yet released detailed information on performance measures under HEARTH. ODSA is also in the process of developing performance measures to be used until the point where HUD's expectations are established.

## **2.7 Is developing a "housing case plan" a requirement for HCRP?**

Each client served by HCRP should have a case management plan pertaining to housing. No client should receive rental assistance without also receiving case management services. That being said, all grantees should hold a Housing First philosophy in providing homelessness prevention and re-housing assistance, which means the extent of the goals in a case management plan could vary greatly from client to client.

## **3 Financial:**

### **3.1 What is the administrative cap for HCRP?**

Region applicants may request up to 7 percent of the total allocation. This percentage is higher than normal due to it being a transitional period. Emergency shelter applicants are capped at 5 percent of the total award for administration costs.

### **3.2 Can grantees make draws by reimbursement only or are advances available?**

Draws can be done on a reimbursement basis or in advance. However, draws cannot be less than \$5,000. Because draws take one to two weeks to be processed, regions should estimate the amount of funds they will need a few weeks in advance.

### **3.3 Is there a match requirement for HCRP?**

Match is required for emergency shelter activities. Homelessness prevention and re-housing activities do not require match. However, regions are encouraged to leverage funds.

### **3.4 Is there a limit of 20 percent on housing relocation and stabilization services for the HPRP activities?**

No, there is no limit. However, this will be evaluated during the application review process on a case-by-case basis.

**3.5 Under the application guidelines, it states a maximum amount for Emergency Shelters but does not make reference to a maximum for shelter diversion or re-housing activities (Region Applicants). Is there a maximum for this?**

No, maximum award amounts only apply to emergency shelters for which competitive funds are being requested. Funds for homelessness prevention and re-housing activities were allocated by formula. It is up to the discretion of the region to allocate funds.

**4 Homeless Management Information System (HMIS):**

**4.1 Does the region lead for HCRP have access to the HMIS data for all the other providers in the region?**

Yes, the region lead will have access to the HMIS data for all activities provided under HCRP homelessness prevention and re-housing activities by partner agencies. If a region wishes to make all data visible to the lead grantee for purposes of creating a comprehensive view of the entire regional system, the lead grantee should contact the Coalition on Homelessness and Housing in Ohio COHHIO with written permission from all agencies agreeing to participate.

**4.2 When entering entry and exit dates into HMIS for rental assistance, should both dates be entered as the day of service, or should the date be left open until the end of the month for which rental assistance was provided?**

The Balance of State should leave clients open for the whole month. Entitlements should follow the policies established by their local continuum. More clarification on HMIS questions will be available at the mandatory implementation training in early December.