

**Substantial Amendment to the Consolidated Plan 2008 Action Plan for the Homelessness  
Prevention and Rapid Re-Housing Program (HPRP)**

**Exhibit 1: Comments and Responses**

***Program Structure***

1. How will the local collaborations work? What assistance will be provided? What is the function and goal of having a lead agency? Is this the same as the Continuum of Care process? *The local collaborative model has been set up to provide an effective and efficient delivery system which can provide services throughout the state to any eligible household. In each county or group counties, the lead agency will be responsible for identifying partner agencies and providing the core housing assistance. Lead agencies need not be involved in the current Continuum of Care process. Partnerships may vary from a fully centralized intake agency which provides all HPRP services and receives only applications from partner agencies, to a lead agency which has subcontracted housing services and data collection to qualified local partners. An evaluation of the local collaboration planning will be part of the application process, but will not require that agencies already have a completed collaborative structure in place prior to being selected as the lead agency. Due to the nature of the competitive process, MFA cannot assist in collaborative efforts until after awards have been made. At that time, MFA can assist lead agencies in working with current service providers and state agency staff. Prior to that time, agencies may contact the New Mexico Coalition to End Homelessness for assistance in local collaborative efforts. Once awards are made, MFA will publish a list of all lead agencies and the areas covered.*
  
2. It sounds like an increase in time, effort, and responsibility with an extremely limited administrative award.  
*The responsibility for overseeing HPRP, as with any public funds, is significant. This model will allow the delivery of services without the duplication of agency and state oversight for services in a given area, and will result in a level of funding per lead agency sufficient to allow the lead agency to operate the program. Agencies should also note that programmatic staff costs are billable as such, and do not come out of the administrative funds.*
  
3. Will HPRP include funding for the operations of group homes for youth? How will HPRP address special needs populations (HIV/AIDS, youth, etc.)? Will service providers for targeted populations be eligible to apply? How will confidentiality issues be addressed?  
*HPRP will not fund the operations of group homes for youth. In recognition of the need to ensure that funds are going to specific target populations, including persons with HIV/AIDS, youth, persons with behavioral health diagnoses, and persons fleeing domestic violence, the HPRP RFP includes a requirement to collaborate with local service providers to serve these specific populations, as well as additional points in the competitive process for those lead agencies which can document a collaborative relationship to serve those populations. All service agencies will be required to adhere to all relevant confidentiality regulations. To the greatest extent possible, MFA will facilitate such local collaboration.*
  
4. Received letter dated April 30, 2009, from the State of New Mexico Children, Youth and Families Department, expressing support for the Proposed Plan for the HPRP. The letter

states, in part, “MFA’s proposed RFP process, formula allocation and focus on collaboration will be of tremendous benefit to New Mexico’s most vulnerable citizens and communities.”

5. Received letters dated April 16, 2009 and April 30, 2009, from the New Mexico Behavioral Health Purchasing Collaborative. The letter of April 30 states, in part, “The HPRP Plan’s proposed conceptual framework provides a comprehensive and collaborative approach across a continuum of service providers for the efficient and effective administration of the HPRP program funds across the State of New Mexico. MFA’s proposed concept of the distribution and management of HPRP funds through a lead agency for a regional service area offers local determination and flexibility to respond to the unique needs of both, at risk of homelessness and homeless individuals and families in each service area of the State.”

6. The letter from April 30, 2009, from the New Mexico Behavioral Health Purchasing Collaborative requests that the HPRP RFP include bonus points for “those lead agencies and regions that can implement bridge rental supportive housing partnerships as well as other partnerships that focus on the efficient and effective delivery of services in their area”.

*As a result of discussions with the New Mexico Behavioral Health Purchasing Collaborative, the HPRP RFP includes scoring incentives for agencies which can demonstrate the ability to specifically serve persons with behavioral health diagnoses. The programmatic requirements of HPRP are such that all agencies serving this population will need to demonstrate a transition plan to permanent housing for those individuals, and a viable transition plan would be bridge assistance until such time as mainstream housing assistance is obtained.*

### ***Funding Allocations, Procurement Process and Contracts***

7. What process will be used to determine the lead agency in an area?

*As specified in the plan, a competitive RFP process will be used.*

8. For agencies which want to provide services and apply for funding statewide, it is difficult to predict the demand for services in different areas.

*The formula allocation is an approximation of the level of need per county. Agencies which want to apply for statewide funding may need to collaborate with several regional providers to provide targeted services.*

9. Can HPRP funds be paid out in a lump sum for 3 years?

*No. Contracts will be for one year periods, with an annual renewal option up to the three year program periods. Subgrantees will be able to receive advances, which will be made on a periodic basis.*

10. Can HPRP funds be used on tribal lands?

*MFA has submitted this question to HUD, and has received the response that HUD is working on policy on this issue. However, tribal governments are not eligible as subgrantees.*

11. The funding allocations do not have tribal lands broken out.

*The statistics used to create the allocations do not separately track the population on tribal lands.*

12. What happens if an area is not served?

*MFA is tasked with serving the entire state, to the greatest extent feasible. If through the RFP process a given area has not been proposed, the RFP and contract negotiation process includes the right and responsibility of the MFA to request that a successful Offeror in a neighboring area provide services in that area.*

13. If an agency has a contract to serve several counties, what is the commitment to the original funding allocations? Would funding be tracked per county? What if the relative level of need changes during the program term?

*Contractors with funding for more than one county will have budgets on a per county basis. If the level of demand and utilization, provided that appropriate outreach efforts have been made, the contractor may submit a budget change request to MFA to move funds from one county to another. The formula allocations may be changed by MFA over the course of the program, based on changes in the level of need and contract performance.*

14. The RFP response period of 30 days may be too short for agencies which are responding to multiple RFPs. Could this deadline be extended?

15. Extending the deadline of the RFP could mean a delay in services to the people who need them.

*While the MFA recognizes the pressure on all agencies through the competitive process, the deadlines for the funding and provision of services are such that a 30 day response time is the longest feasible timeframe, given the due process inherent in the competitive process.*

#### ***HPRP Eligible Activities – Financial Assistance, Housing Stabilization and Related Services***

16. There will be a need for outreach to notify potential beneficiaries about the program prior to eviction, and prior to the end of the funding period.

*All HPRP subgrantees will be required to conduct appropriate outreach activities; technical assistance will be provided.*

17. What will recertification of households involve?

*Beneficiaries of medium-term rental assistance would need to have a recertification of household need every three months, including household income and other risk factors. The criteria for completing the period of assistance to the household will include an assessment of the household's ability to maintain stable housing without assistance.*

18. Are recipients of Section 8/Housing Choice Vouchers eligible for utility arrearages assistance?

*Yes. Recipients of any other housing assistance, however, would not be eligible for HPRP assistance which is in the same category as the assistance already being received.*

19. Will assistance be available for undocumented immigrants?

*While there has been no guidance yet on this issue, current guidance for HUD programs is such that emergency assistance, including transitional housing, does not require an assessment of residency status; legal residency is required for long-term or permanent assistance.*

20. Will agencies have the ability to move funds between the activities of Homelessness Prevention and Rapid Re-Housing?

*Yes.*

### ***HPRP Eligible Activities – Data Collection and Evaluation***

21. What does data collection entail, and what is HMIS?

*The New Mexico Homeless Management Information System (HMIS) is a statewide web-based database which is used to track information about people experiencing homelessness. The data entered is client-specific, including demographics, homelessness and intake status, exit status, and income. Revised data standards, including specific requirements for HPRP, are due to be published on 4/30/09. The NM HMIS lead agency is the New Mexico Coalition to End Homelessness.*

22. Why is data being collected, when service providers are better suited to focusing on services, and is HMIS required?

*Data collection and HMIS provide essential performance data, and are required components of HPRP. HMIS is required unless an alternate database is available.*

23. Does HMIS training come out of administrative funds?

*HMIS training specific to HPRP would come out of the Data Collection and Evaluation funds.*

### ***HPRP Eligible Activities – Administrative Costs***

24. What will the administrative fee percentage be?

*Administrative costs are covered up to 5%, which will be shared between MFA and subgrantees as stated in the plan. The amount awarded will be proportional to the program funding allocation. Note that the costs of program delivery, including staff time, are covered under program activities, not under administrative costs.*