



## **Disaster Housing Assistance Program – Katrina (DHAP-Katrina): Transitional Closeout Plan Operating Requirements.**

**February 21, 2009**

### **1. Purpose.**

These operating requirements set forth the policies and procedures for the administration of the DHAP-Katrina Transitional Closeout Plan. The DHAP-Katrina program was scheduled to terminate on March 1, 2009. However, the Department of Housing and Urban Development (HUD) and the Federal Emergency Management Agency (FEMA), through local Public Housing Agencies (PHAs), shall provide transitional rental payments (TRP) on behalf of eligible DHAP-Katrina families for up to an additional six months, from March 1, 2009 through August 31, 2009.

PHA responsibilities under this initiative include outreach to families and landlords, calculating the monthly TRP, making monthly TRPs on behalf of participating families, payment reconciliation, and updating records in the Disaster Information System (DIS) including changes in rental information, and end of participation. At a State's request, some PHAs may also agree to partner with states to provide case management services. In the event that a state requests to provide case management services, but is unable to partner with a local PHA to provide these services, HUD will identify an alternative potential partner for the state.

PHAs that agree to administer the DHAP-Katrina Transitional Closeout Plan must do so in accordance with these operating requirements and any subsequent HUD directives and guidance for the program.

### **2. Background.**

In August 2005, Hurricane Katrina struck the Gulf Coast of the United States causing unprecedented and catastrophic damage to property, significant loss of life, and the displacement of tens of thousands of individuals from their homes and communities. In September 2005, Hurricane Rita closely followed Hurricane Katrina and once again hit the Gulf Coast of the United States, adding to the damage to property and displacement of individuals and families.

The DHAP-Katrina was established in September 2007 to provide temporary rental assistance to families impacted by Hurricanes Katrina and Rita. Over the last 18 months, HUD and FEMA have provided eligible families with rental assistance and case management services to support families in their transition from temporary to long term, sustainable housing.

In February 2009, HUD issued letters reminding program participants that the last rent payment to landlords under DHAP-Katrina would be made in February 2009, and that all Disaster Rent Subsidy Contracts (DRSC) would expire on February 28, 2009. (The DRSC is

the contract between the PHA and the landlord for payment and receipt of rental subsidies on behalf of each family.)

However, based on requests by the affected states for the extension of this program, HUD and FEMA have agreed to provide TRPs on behalf of DHAP-Katrina families who received a rental subsidy of over \$100 in February 2009. TRPs will commence March 1, 2009, and will be made directly to landlords through the DHAP-Katrina administering PHAs. The purpose of these monthly TRPs is to ensure that sufficient time is available for eligible families to apply for and transition to the Housing Choice Voucher (HCV) program, other federal or state housing assistance programs, or make other arrangements for self-sufficiency. In addition, TRPs will prevent extreme and immediate increases in the rent burden for DHAP-Katrina families resulting from the end of the DHAP-Katrina program.

*Note: Congress appropriated an additional amount for "Tenant-Based Rental Assistance", as authorized under the United States Housing Act of 1937 (42 U.S.C. 1437 et seq.). This appropriation provides \$85,000,000 in HCV funding, to remain available until expended, for incremental housing assistance, including related administrative expenses, for persons assisted under the DHAP-Katrina whose assistance would otherwise end on March 1, 2009. This funding is separate from that provided by FEMA for the DHAP-Katrina Transitional Closeout Plan.*

In February 2009, HUD and FEMA executed an amendment to the Interagency Agreement (IAA) that was initiated in September 2007. This amendment authorizes HUD to act as the servicing agency for the DHAP-Katrina Transitional Closeout Plan and allows for the administration of TRPs on behalf of families effective March 1, 2009. Pursuant to FEMA's grant making authority, HUD, on behalf of FEMA, will invite DHAP-Katrina PHAs to amend their current grant agreements to allow them to administer the TRPs on behalf of FEMA. Under this initiative, PHAs will make TRPs on behalf of eligible families to participating landlords for a period not to exceed six months commencing March 1, 2009 and ending August 31, 2009. If a PHA chooses not to participate, HUD, on behalf of FEMA, will invite another PHA capable of performing the direct payment function to enter into a grant agreement to administer the TRP.

### **3. Operating Requirements.**

The operating requirements for the DHAP-Katrina Transitional Closeout Plan are presented in the following order:

- a. Family eligibility, prohibition against other subsidy, and family outreach
- b. Participating PHAs
- c. Fees
- d. Landlords, leases and DRSCs
- e. Payment controls and oversight
- f. Transitional Rental Payment (TRP)
- g. New units and subsequent moves
- h. Case management

- i. End of the DHAP-Katrina Transitional Closeout Plan
- j. Use of DHAP-Katrina Transitional Closeout Plan funding, program accounts and records
- k. Disbursement of funds
- l. Financial reporting
- m. Close-Out
- n. Other matters
- o. Additional information

**a. Family eligibility, prohibition against other subsidy, and family outreach**

PHAs will pay TRPs directly to landlords on behalf of eligible families for whom a monthly rent subsidy payment was made for the month of February 2009. Families who did not receive a February 2009 rent subsidy payment under DHAP-Katrina greater than \$100 for the month of February 2009 are not eligible for TRPs. Families whose participation in DHAP-Katrina ended before March 1, 2009 are also not eligible for TRPs. In addition, families are not eligible for TRPs if they are receiving alternative federal or state housing assistance or residing in an ineligible unit type, including but not limited to:

- Public housing unit or Indian housing unit;
- A unit receiving assistance under section 8 of the 1937 Act, including the HCV program;
- Nursing homes, board and care homes, or facilities providing continual psychiatric, medical, or nursing services;
- College or other school dormitories;
- Units on the grounds of penal, reformatory, medical, mental, and similar public or private institutions;
- A unit occupied by its owner or by a person with interest in the unit;
- A FEMA provided temporary or permanent housing unit;
- A HUD Real Estate Owned (REO) property;
- A rental unit receiving assistance under DHAP-Ike/Gustav; or
- A unit in which one of the family members has ownership interest.

Furthermore, the family may not receive the benefit of the TRP while receiving the benefit of another housing subsidy, for the same unit or for a different unit, described in 24 CFR 982.352(c). This prohibition covers other housing assistance provided by FEMA or HUD.

The PHA will verify that a family is eligible for a TRP through DIS. DIS is a web-based system that provides family information to the PHA. DIS is also the reporting mechanism by which PHAs provide information to HUD regarding families that have received a TRP or ended their participation with the program. HUD will match information in DIS to PIC and TRACS and notify PHAs of any duplicate assistance matches across HUD housing programs. Families with duplicate assistance, as listed above, may not receive a TRP.

PHAs shall send information letters, via certified or registered mail, to all families concurrently with the TRP. An additional letter that is directed to the family's landlord will

be enclosed with this letter. The family may present the enclosed landlord letter to the landlord. However, PHAs will also make direct contact with all landlords by certified or registered mail. The landlord letter describes the requirements of the TRP, including the landlord's responsibilities and obligations if the landlord accepts the March payment and any subsequent TRP on behalf of the family.

If the letter to the family is returned because the family has moved, the PHA will attempt to contact the family and the landlord. If unable to contact the family or landlord before May 1, the PHA will cease payments until the family contacts the PHA and provides a new qualifying lease. The PHA will update the landlord information in DIS and issue the TRP payment to the new landlord. This triggers PHA controls requiring PHAs to recoup payments made to previous landlords where families in the DHAP-Katrina Transitional Closeout Plan did not occupy the units during the timeframe covered by the payment

**b. Participating PHAs**

HUD will utilize its existing network of local PHAs that administered the DHAP-Katrina to implement and administer the Transitional Closeout Plan. HUD, on behalf of FEMA, will negotiate an extension to all existing DHAP-Katrina grant agreements with willing PHAs for a period of six months. Once the PHA agrees to participate and executes the grant agreement extension, HUD will provide the PHA with a packet including model landlord and tenant letters.

If a PHA chooses not to participate, HUD, on behalf of FEMA, will invite another PHA capable of performing the direct payment function to enter into a grant agreement to administer the TRP. PHAs that decline participation must immediately provide to HUD their DHAP-Katrina Housing Assistance Payment (HAP) register for February 2009. HUD will then provide the register to the PHA that will perform the direct payment function on behalf of the family.

HUD is committed to affirmatively furthering fair housing under the DHAP-Katrina Transitional Closeout Plan. The PHA must administer the program in conformity with the Fair Housing Act, Title VI of the Civil Rights Act of 1964, section 504 of the Rehabilitation Act of 1973, and Title II of the Americans with Disabilities Act

**c. Fees**

PHAs will receive a onetime administrative fee of \$1,000 for each family that receives a TRP for the agreed six month period beginning March 1, 2009. The fee will be paid to the PHA up front with the initial rental assistance for the family. This fee is not prorated by family duration in the DHAP-Katrina Transitional Closeout Plan. For example, if a family converts into the HCV program effective May 1<sup>st</sup>, the PHA still retains the full \$1,000 administrative fee.

This fee is the only administrative fee provided to cover payment processing and other costs, for all families for the potential maximum six month period. The fees must be used in

accordance with the Grant Agreement, these operating requirements and any subsequent requirements issued by HUD in relation to the DHAP-Katrina Transitional Closeout Plan.

**d. Landlords, leases and DRSCs**

All DRSCs between PHAs and participating landlords established under DHAP-Katrina end on February 28, 2009. Given the short period of time to implement the Transitional Closeout Plan, PHAs will not have sufficient time to execute a new or amended DRSC with existing landlords by March 1, 2009. Therefore FEMA, through the IAA with HUD, has authorized HUD and its PHAs to make or tender TRPs to landlords without an executed DRSC and before effecting other binding agreements between PHAs and landlords as set forth in the IAA.

Concurrent with payment by check or an Electronic Fund Transfer (EFT) for rent subsidies for March 2009, the PHAs will send each landlord a letter setting forth HUD's intent to continue rent subsidies for up to six months during the Transitional Closeout Plan. The letter will include a list of tenants covered by the TRP (Attachment A) and landlord requirements (Attachment B). The letter and its Attachment B constitute the Letter Agreement (hereafter the LA). The LA will be sent by the PHAs via certified or registered mail (or another mechanism shall be used to validate that the landlord has received notice of the terms of the letter) and shall:

- 1) explain HUD's intent to continue rent subsidies for up to six months during the Transitional Closeout Plan, and explaining the amended Incremental Rent Transition (IRT);
- 2) state that a landlord's deposit or acceptance of the tendered TRP for March and for each subsequent month (up to six months), and that failure to return the TRP in whole (or in part with respect to any individuals or households who are no longer tenants or for whom the landlord no longer wishes to participate in the program), will constitute contractual acceptance in whole (or in part with respect to particular individuals or households) by the landlord of an agreement for that month to provide the specified dwelling unit for the tenant;
- 3) state that any landlord accepting the TRPs for any tenant agrees to continue providing housing services to the tenant for up to six months or until the tenant no longer qualifies for the TRP or chooses no longer to live at the premises, and that the landlord must promptly report to the PHA when the tenant vacates the unit or begins receiving a non-DHAP-Katrina Transitional Closeout Plan rental subsidy;
- 4) state that the landlord has no right to the federal funds constituting the TRP for any given month unless the landlord accepts the contractual obligation to provide the specified dwelling unit to the tenant for that month, and that failure to return the federal funds if the landlord does not provide commensurate housing services as set forth therein is a federal offense subject to prosecution.

PHAs will direct landlords to return a signed copy of the LA acknowledging that they will abide by its terms and conditions. PHAs' tendering of the TRP in any month of the amended six month period is not contingent on any landlord returning the LA. Nor is the formation of a binding agreement between a PHA and landlord contingent on the landlord returning the LA; a binding agreement is formed upon the landlord's acceptance of (or failure to return within the specified time) tendered TRPs. However, if a landlord does not return the LA before May 1, 2009, the PHA will contact the family and landlord before tendering or making the May 2009 TRP to verify that these funds are being used to house eligible tenants at the specified address.

By accepting the March 2009 payment or any subsequent transitional rent subsidy payments in whole or in part, the landlord agrees:

- 1) To certify to the terms of the LA.
- 2) To provide the specified dwelling unit(s), according to the terms of the LA, to the tenant(s) listed on Attachment A of the letter for the month(s) for which the landlord accepts the TRP for those tenant(s);
- 3) To continue accepting monthly TRPs (reduced by \$100 per tenant per month, as set forth below) for each tenant the landlord agrees to house in March, and to continue providing housing services to such tenants according to the terms in the letter, for up to six months (until the tenant no longer qualifies for transitional assistance or chooses no longer to live at the premises);
- 4) To report promptly (within 14 days) to the PHA when the tenant vacates the unit or when the landlord learns the tenant begins to receive a non-DHAP-Katrina Transitional Closeout Plan rental subsidy. If the landlord is receiving non-DHAP-Katrina Transitional Closeout Plan rental assistance for a tenant, the landlord is prohibited from accepting a TRP for that tenant; and
- 5) To return any unused or unaccepted amount of TRP for any month within 30 days from receipt of the payment, along with a list identifying tenant(s) who have vacated the unit(s) or for whom the landlord no longer can or will accept rental assistance. The TRP may only be used to provide rental assistance for the tenant(s) listed in Attachment A of the letter.

**e. Payment controls and oversight**

Under the IAA between HUD and FEMA, HUD and the PHAs are not liable to FEMA for payments to landlords during the DHAP-Katrina Transitional Closeout Plan as a result of those payments having been made without a DRSC. FEMA and HUD believe the risk associated with this approach is mitigated to a great extent because most of the landlords currently participating in the DHAP-Katrina have on-going business relationships with PHAs, and oversight controls will be put into place to recover any improper payments or inadvertent overpayments. HUD and PHAs are implementing additional cost-effective controls to ameliorate this risk. The controls include, but are not limited to, the following:

- PHAs shall properly notify families and landlords of payments to be made and describe the permitted use of such payments;
- PHAs shall send information letters, via certified or registered mail, to all families concurrently with payment. If the letter to the family is returned because the family has moved, the PHA shall attempt to contact the family and the landlord. If unable to contact, the PHAs will cease payments until the family contacts the PHA and provides a new lease to arrange for future payments (this triggers PHA controls requiring PHAs to recoup payments made to previous landlords where families in the DHAP-Katrina Transitional Closeout Plan did not occupy the units during the timeframe covered by the payment). The PHA will update the landlord information in the DIS and issue the TRP to the new landlord;
- If mail to the landlord is undeliverable, and the PHA is unable to confirm landlord information, the PHA will attempt to contact the family and landlord. If still unable to contact, the PHAs will cease payments until the family or landlord contacts the PHA. HUD will subsequently provide FEMA with reports that detail submission of these letters relative to tenants under lease;
- PHAs will work with HUD to match data against HUD databases to preclude duplicate payments or multiple housing assistance program enrollments;
- HUD's Office of the Inspector General (OIG), will work in collaboration with the Department of Homeland Security (DHS) OIG, in collection of improper payments made to landlords;
- PHAs and HUD will report on a monthly basis those families who have ended their participation in the DHAP-Katrina Transitional Closeout Plan to FEMA;
- PHAs that are able shall include the following statement as an insert to letters or on checks and EFTs: "DHAP payment – misuse subject to 42 U.S.C. 5157 and available legal remedies."; and
- PHAs and HUD will commence a public notification campaign to inform families and landlords of the terms of the DHAP-Katrina Transitional Closeout Plan and TRPs.

**f. Transitional Rental Payments (TRP)**

The DHAP-Katrina Transitional Closeout Plan provides a monthly rent subsidy to assist eligible families with their transition out of the DHAP-Katrina. Assistance shall begin on March 1, 2009, and continue for up to six months (ending August 31, 2009). The monthly TRP is paid directly to the landlord.

TRPs for March 2009 will equal the amount of monthly rent subsidy paid on behalf of the family under DHAP-Katrina for the month of February 2009 reduced by \$100. The TRP on behalf of the family will be reduced by an additional \$100 every subsequent month. For example, a family that received rental assistance of \$500 in February 2009 will receive a March 2009 TRP of \$400, an April TRP of \$300 and so on. In no case may the TRP exceed the lease rent charged by the owner.

TRPs will be made to the landlords for the lesser of six months or until the TRP is zero as a result of the monthly reductions of \$100. No landlord may accept payment for any month following the month the family vacates the unit. Nor may the landlord accept payments if

the landlord receives a duplicative federal or state rent subsidy payment on behalf of the family. PHAs will recoup such payments and shall refer to HUD's OIG those landlords that do not comply for action to be undertaken in coordination with the DHS OIG. The \$100 reduction applies to all families. There are no hardship waivers regardless of household income or DHAP-Katrina Phase 1, 2 or 3 statuses. All existing hardship waivers will end on February 28, 2009. Family income is not considered in calculating the monthly TRP. The family is responsible for any portion of the rent that is not covered by the monthly TRP. The family pays its share of the rent directly to the owner. The family also pays any tenant-supplied utilities directly to the utility supplier.

Very low-income families will be encouraged to apply for the special DHAP-to-HCV rental assistance or other permanent assistance at the earliest opportunity and should not delay this process because of the TRP. Extending the time period for families to apply and lease a unit with permanent HCV assistance is the main reason for the DHAP-Katrina Transitional Closeout Plan.

**g. New units and subsequent moves**

The last payment for the DHAP-Katrina was provided for February 2009. Since that payment families may have moved to a new unit in anticipation of the end of the DHAP-Katrina and their lease. In these cases, the information letter to families will likely be returned. If the letter to the family is returned, the PHA should contact the family by telephone if possible and ask them to bring their new lease into the PHA. The PHA will update the landlord information in the DIS, and issue payment to the new landlord.

If the family has moved to a new jurisdiction following the February 2009 payment, the PHA will inform HUD and HUD will assign the family to the appropriate PHA. After receiving the March 2009 TRP, the family may request to move to another unit with continued TRP assistance if:

- (1) the family informs the PHA in advance of the move and provides a copy of the new lease and owner contact information.
- (2) the lease has terminated (including lease terminations by mutual consent);
- (3) the owner has given the family a notice to vacate, has commenced an action to evict the family, or has obtained a court judgment or other process allowing the owner to evict the family; or
- (4) the family has given notice of lease termination if the family has a right to terminate the lease on notice to the owner.

Note that in the case where the owner has commenced an action to evict the family or has obtained a court judgment or other process allowing the owner to evict the family, the PHA may have grounds to terminate the family's participation in the DHAP-Katrina Transitional Closeout Plan if the cause of the eviction is the family's serious or repeated violation of the lease. If the PHA terminates the family's participation in the DHAP-Katrina Transitional Closeout Plan, the family will not be permitted to move to another unit with continued TRP assistance.



In other circumstances, the family may move with continued TRP assistance within the jurisdiction of the PHA administering the family's TRP assistance. The PHA may limit the number of moves a family may make within the PHA jurisdiction. Any such limit does not apply to cases where the family must move because the owner is terminating the tenancy.

A family that is receiving a TRP may also make one move outside of the initial DHAP-Katrina PHA's jurisdiction and continue to receive a TRP. It is anticipated that a family will usually exercise this option to either return to its pre-disaster home area or to an area where the family wishes to permanently reside at the end of the DHAP-Katrina Transitional Closeout Plan.

Once the family has exercised its opportunity to move outside of the initial DHAP-Katrina PHA's jurisdiction, the family may not move again between PHA jurisdictions and continue to receive TRPs.

In order to process a family's request to move outside of the PHA jurisdiction, the PHA initially providing TRP assistance (initial DHAP-Katrina PHA) to the family must contact the receiving TRP PHA to notify them to expect the family. The initial DHAP-Katrina PHA completes the portability move-out information in the DIS and approves the family's move.

The receiving TRP PHA will access the incoming family's information through the DIS. HUD will provide funding for the TRP directly to the receiving TRP PHA on the basis of the portability information entered into the DIS.

A prorated share of the administrative fees provided to the initial DHAP-Katrina PHA for the family that is moving to a TRP PHA jurisdiction will be transferred to the receiving TRP PHA as part of this process. The proration of the fees is based on the number of months remaining from the time administrative responsibility for the family shifts to the receiving TRP PHA until the TRP ends.

#### **h. Case management**

In accordance with the original IAA, case management services under DHAP-Katrina end on February 28, 2009. At that time, PHAs will not have access to Tracking-at-a-Glance (TAAG), the DHAP-Katrina case management tracking system.

States may request a grant through HUD to partner with a PHA(s) in delivering case management services to families during the transitional closeout. Upon FEMA approval of funding such requests, HUD, on behalf of FEMA, will facilitate grant agreements between PHAs and FEMA for states to provide case management services. In the event that a state requests to provide case management services, but is unable to partner with a local PHA to provide these services, HUD will identify an alternative potential partner for the state

HUD will issue a notice regarding case management funding for states under the Transitional Closeout Plan. Proposal submission and the award process will be outlined in the notice. All

case management provided under the DHAP-Katrina Transitional Closeout Plan will closely mirror that provided under DHAP-Katrina, and grant agreements entered into between HUD, PHAs and their state partners will clearly state these guidelines.

**i. End of the DHAP-Katrina Transitional Closeout Plan**

The DHAP-Katrina TRP is temporary disaster-based housing assistance. These payments end on August 31, 2009. If the family's participation in the DHAP-Katrina Transitional Closeout Plan ends for any reason prior to the August 31, 2009 termination date of the program, the PHA must record the family's end of participation in the DIS.

**j. Use of DHAP-Katrina Transitional Closeout Plan Funding, Program Accounts, and Records**

DHAP-Katrina Transitional Closeout Plan funding may not be used for activities or costs other than those outlined in the IAA and grant agreements. DHAP-Katrina Transitional Closeout Plan funding remains separate and distinct from the PHA's regular voucher program and the DVP in terms of the source and use of the funding. The PHA is required to maintain records that allow for the easy identification of families assisted under the DHAP-Katrina Transitional Closeout Plan, and must report monthly leasing and expenditures for such families separately from HCV and DVP families under the Voucher Management System (VMS). The PHA must maintain a separate HAP register for the DHAP-Katrina Transitional Closeout Plan to record and control TRPs.

PHAs are reminded that DHAP-Katrina Transitional Closeout Plan family information is reported to HUD through the DIS. **A PHA administering the DHAP-Katrina Transitional Closeout Plan does not complete a HUD 50058 or enter any information on a DHAP-Katrina family into the Public Housing Information Center (PIC) system.**

The PHA must maintain complete and accurate accounts and other records for the program in accordance with HUD requirements and in a manner that permits a speedy and effective audit in accordance with OMB Circular A-133. The records must be in the form required by HUD, including requirements governing computerized or electronic forms of record-keeping. The PHA must comply with the financial reporting requirements in 24 CFR part 5, subpart H.

The PHA must furnish to HUD accounts and other records, reports, documents and information, as required by HUD. HUD will provide the aggregated information to FEMA monthly.

HUD, FEMA, DHS OIG, HUD OIG and the Comptroller General of the United States shall have full and free access to all PHA offices and facilities, and to all accounts and other records of the PHA that are pertinent to the administration of the program, including the right to examine or audit the records, and to make copies. The PHA must grant such access to computerized or other electronic records, and to any computers, equipment or facilities containing such records, and shall provide any information or assistance needed to access the records.

During the term of the DHAP-Katrina Transitional Closeout Plan, and for at least three years thereafter, the PHA must keep:

- A copy of correspondence with landlords, including landlord certifications;
- HUD-required reports;
- Accounts and other records supporting PHA budget and financial statements for the program;
- Reports required under the IAA, SOP, grant agreement and all amendments there to; and
- Other records specified by HUD.

**k. Disbursement of Funds**

All disbursements of funding advances for rent subsidy payments will be based on data entered by the PHA into the DIS. On a monthly basis HUD will calculate the PHA's aggregate funding needs and compare it to funding previously provided. When actual leasing costs exceed previous funding, additional funding will be advanced to the PHAs. On the other hand, if the funding provided exceeds actual leasing costs, future disbursements will be offset by the excess funds.

PHAs will not have to submit any type of budget or requisition for payment. Monthly funding will be automatically scheduled for payment on the first of the month. At that time, the PHA will receive an "Intent to Pay" notice that details scheduled payments.

**l. Financial Reporting**

The VMS data collection will be revised to capture DHAP-Katrina Transitional Closeout Plan units leased and actual rental subsidy costs. In order for HUD to track monthly leasing information, the PHA must enter actual costs for DHAP-Katrina Transitional Closeout Plan families in the VMS. PHAs must report in VMS the actual rental assistance costs and leasing for each month within the quarter. Submissions are due the last day of the month following the closing date of each quarter. HUD will aggregate and submit this information to FEMA monthly, associated by family (FEMA registration ID).

**m. Program Close-Out**

Upon conclusion of the PHA's DHAP-Katrina Transitional Closeout Plan program, HUD will reconcile reported costs and leasing from the VMS and DIS. Actual rent subsidy payments will be settled through VMS reporting. If the costs exceed the funding provided by HUD, a final underpayment will be processed. If the funding provided by HUD exceeds reconciled costs, the PHA will remit the overpayment to HUD for return to FEMA, associated by family (FEMA registration ID).

**n. Other Matters.**

The information collection requirements imposed by HUD in this document have been approved by the Office of Management and Budget (OMB) under the Paperwork Reduction Act (PRA) of 1995 (44 U.S.C. 3501-3520) and assigned OMB control number 2577-0169. In accordance with the PRA, HUD may not conduct or sponsor, and a person is not required to respond to, a collection of information unless the collection displays a currently valid OMB control number.

**o. Additional Information.**

Any questions related to DHAP or this notice should be addressed to HUD at (202) 708-0477. Email questions and requests should be sent to [DHAP\\_RG@HUD.GOV](mailto:DHAP_RG@HUD.GOV).