

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

Grantees eligible to receive funds under the Homelessness Prevention and Rapid Re-Housing Program (HPRP) are required to complete a substantial amendment to their Consolidated Plan 2008 Action Plan. This form sets forth the required format for this substantial amendment. A completed form is due to HUD within 60 days of the publication of the HUD HPRP notice.

To aid grantees in meeting this submission deadline, the HPRP Notice reduces the requirement for a 30-day public comment period to no less than 12 calendar days for this substantial amendment. With this exception, HPRP grantees are required to follow their Consolidated Plan's citizen participation process, including consultation with the Continuum of Care (CoC) in the appropriate jurisdiction(s). Grantees are also required to coordinate HPRP activities with the CoC's strategies for homeless prevention and ending homelessness. To maximize transparency, HUD strongly recommends that each grantee post its substantial amendment materials on the grantee's official website as the materials are developed.

A complete submission contains the following three documents:

- 1) A signed and dated SF-424,
- 2) A completed form HUD-40119 (this form), and
- 3) Signed and dated General Consolidated Plan and HPRP certifications.

For additional information regarding the HPRP program, visit the HUD Homelessness Resource Exchange (www.hudhre.info). This site will be regularly updated to include HPRP resources developed by HUD and its technical assistance providers.

The information collection requirements contained in this application have been submitted to the Office of Management and Budget (OMB) for review under the Paperwork Reduction Act of 1995 (44 U.S.C. 3501-3520). This agency may not collect this information, and you are not required to complete this form, unless it displays a currently valid OMB control number.

Information is submitted in accordance with the regulatory authority contained in each program rule. The information will be used to rate applications, determine eligibility, and establish grant amounts.

Public reporting burden for this collection of information is estimated to be 16 hours, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. This information is required to obtain benefits. To the extent that any information collected is of a confidential nature, there will be compliance with Privacy Act requirements. However, the substantial amendment to the Consolidated Plan 2008 Action Plan does not request the submission of such information.

Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

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A. General Information

| | |
|--|---|
| Grantee Name | State of Rhode Island |
| Name of Entity or Department Administering Funds | Department of Administration, Division of Planning, Office of Housing and Community Development |
| HPRP Contact Person (person to answer questions about this amendment and HPRP) | Noreen Shawcross |
| Title | Chief, Office of Housing and Community Dev't |
| Address Line 1 | One Capitol Hill - 3rd Floor |
| Address Line 2 | |
| City, State, Zip Code | Providence, RI 02908-5873 |
| Telephone | 401-222-5766 |
| Fax | 401-222-2083 |
| Email Address | nshawcross@doa.ri.gov |
| Authorized Official (if different from Contact Person) | Same as above |
| Title | Same as above |
| Address Line 1 | Same as above |
| Address Line 2 | |
| City, State, Zip Code | Same as above |
| Telephone | Same as above |
| Fax | Same as above |
| Email Address | Same as above |
| Web Address where this Form is Posted | http://www.hrc.ri.gov/HPRP.php |
| | |

| | |
|---|--------------------|
| Amount Grantee is Eligible to Receive* | \$3,282,670 |
| Amount Grantee is Requesting | \$3,282,670 |
| | |

*Amounts are available at <http://www.hud.gov/recovery/homelesspreventrecov.xls>

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B. Citizen Participation and Public Comment

1. Briefly describe how the grantee followed its citizen participation plan regarding this proposed substantial amendment (limit 250 words).

Response:

Funding availability and notice of public hearing was published in the Providence Journal (newspaper of general circulation) on April 12, 2009, two (2) weeks before the actual hearing date. An additional notice was published in a newspaper that primarily serves minority communities (Providence en Espanol). The State's formal public hearing, to solicit the views on the draft plan for distribution of Homeless Prevention and Rapid Re-Housing Program funds, was held at 4:00pm - April 27, 2009 at the Department of Administration, located in the City of Providence. The facility is centrally located and handicapped accessible. Additional accommodations for those with disabilities and non-English speaking persons were available as needed and upon request. The draft plan was additionally posted on the State's HPRP website at:

<http://www.hrc.ri.gov/HPRP.php>

Comment were accepted on the draft plan through May 11, 2009. In addition, the State also conducted a series of meetings with stakeholders in the development of the program design. These meetings included the following:

- | | |
|------|--|
| 3/23 | Rhode Island Interagency Council on the Homeless Governor and State Department Directors |
| 3/30 | Rhode Island HPRP-entitlement municipalities |
| 4/2 | State Continuum of Care, Policy Academy, Office of Homelessness Various homeless provider agencies (public and private) |
| 4/8 | Kent County Area Providers & Domestic Violence Groups |
| 4/9 | East Bay Area Providers |
| 4/9 | Corrections & Re-entry Population |
| 4/13 | Rhode Island Latino Civic Fund (United Way) |
| 4/14 | Basic Needs Network of Washington County Service Providers and Faith-Based Community |
| 4/21 | Newport County Social Service Agencies, Community Leaders, Faith-Based Community |
| 4/29 | Rhode Island Community Action Association |

2. Provide the appropriate response regarding this substantial amendment by checking one of the following options:

- Grantee did not receive public comments.
 Grantee received and accepted all public comments.

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Grantee received public comments and did not accept one or more of the comments.

3. Provide a summary of the public comments regarding this substantial amendment. Include a summary of any comments or views not accepted and the reasons for non-acceptance.

Comment: Prior to the public comment period, 10 stakeholder meetings were held (as noted above). Participants generally emphasized the need for permanent, subsidized housing with supportive services as a key element to rapidly re-house families and individuals transitioning from homelessness. An emphasis on the need for employment or income (using the Rhode Island SSI/SSDI Outreach, Access, & Recovery (SOAR) program) to sustain housing was a focus of each stakeholder meeting. Other universal comments included the need for:

- Training, outreach, and targeted education about HPRP resources for both providers and the community;
- Assistance to include financial literacy;
- Legal services;
- Additional services for those who have been chronically homeless;
- Housing location assistance;
- Coordination among state agencies;
- Coordination among the State of RI and entitlement communities.

Response: All above comments and views from stakeholder were accepted. The State's overall program does permit eligible uses specified. Specific applications should address these findings.

The following is a summary of comments from the public hearing conducted on April 27, 2009 and through May 11, 2009.

Comment: Comments were received that the inclusion of coordination and systems change goals is positive, but should be strengthened. Remarks were made expressing concern for the relationships between service providers and state agencies and among providers. Improved data collection, fund tracking, and common applications, intake, and assessment forms were suggested.

Response: The overarching goals will be enhanced collaboration and long term impact among the entitlement communities, the State of Rhode Island and the housing and service providers. All tracking systems, applications and forms will further these goals.

Comment: Comments were received requesting a set-aside for legal services. Access to legal services was mentioned by a number of participants in stakeholder workshops. Comments were also received objecting to the use of set-asides rather than allowing any organization to apply for funding if eligible under the plan.

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Response: The State will implement a process that allows for competitive funding with a focus on inclusiveness as to target populations, geographic coverage, and range of services including legal services.

Comment: Homeless consumers urged provisions for any centralized agency to be accessible to those who may not be allowed there due to behavior history. They noted that information and employment opportunities should be available through a one-stop model. Consumers should be incorporated into any outreach programs.

Response: The State acknowledges the need to ensure and simplify access to all HPRP services. Consumer involvement/employment opportunities will be included in the criteria of the competitive process.

Comment: Numerous comments were received emphasizing that employment or benefits must be connected to any financial assistance.

Response: HPRP resources will be targeted and prioritized to serve households that are most in need of this temporary assistance and are most likely to achieve stable housing, whether subsidized or unsubsidized, outside of HPRP after the program concludes. Such ability is contingent upon successfully linking persons to employment, income and/or other benefits. Specific proposals will be required to detail their plan to comprehensively meet the needs of the households assisted. The State has added language to be clear that sustaining income will be connected to financial assistance and has already referenced the SSI/SSDI Outreach, Access and Recovery (SOAR) program.

Comment: Comments were received that programs should avoid duplication and reinvention of existing services and support systems. There are many community based organizations providing quality services, so collaboration and coordination among agencies, including intake, assessment and case management, will be integral to the HPRP work. The need for more centralized tracking was also expressed.

Response: The State agrees with these comments and all of these concepts are in the Amendment.

Comment: Comments were received that there is too little focus on specialized populations, like individuals with HIV/AIDS, substance abusers, homeless youth, sex offenders, violent crime groups, the mentally ill, etc. Concerns were also expressed that the HPRP did not adequately address reentry populations.

Response: The State has not limited eligible populations in its overall program design. However, populations with have high rates of homelessness, including those detailed, will be considered and/or prioritized when funding specific applications. The State has included language that would make it clear that HPRP

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funds will be inclusive and will target special populations who are at risk of homelessness or are homeless.

Comment: Many remarks advocated for the use of voucher programs for social services and emphasized their successes.

Response: It is acknowledged this model has been working successfully, and the Amendment would allow this in terms of program development.

Comment: Concerns were expressed for the need of a coordinated centralized program intake to oversee operations and monitor that consumers receive the case management services they need and prevent duplication.

Response: The State has emphasized coordination in its “Plan to End Homelessness” and will utilize HPRP practices to determine benefits of further centralization.

Comment: Comments were received that the proposed budget was too service oriented and needed to be more evenly distributed.

Response: The State disagrees and believes that our dual focus on financial assistance and services is the correct approach. Experience with other programs has demonstrated that those who are at imminent risk of homelessness or who are actually homeless generally have a multitude of barriers to housing and income and a menu of individualized services is the only way to sustain people in housing.

Comment: Comments were received that lowest income groups should receive priority over other populations.

Response: The State disagrees that income level alone should be the criteria. The initial case management interview will be used to identify risk factors in a more holistic way. Ability of a households to sustain housing opportunities once the subsidy ends is essential.

Comment: Comments were received that highlighted the importance of regional rental assistance programs with case management services. The need to match available affordable housing opportunities with consumers was emphasized.

Response: The State’s goal is to identify appropriate housing for each individual or family served and to provide the assistance needed for access to that home.

Comment: Comments encouraged the State to work closely with those cities which received direct HPRP allocations, including Pawtucket, Providence and Woonsocket (HPRP Entitlements).

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Response: The State and Entitlements have met to discuss statewide coordination of these resources. A Steering Committee will be assembled with representatives from each of the communities and the State. This committee will develop coordinated operating procedures for funding allocated. Procedures may include a common applications and/or process. Municipal HPRP plans are generally consistent with the State's program design and have been appended to our submittal. Wording of the State's plan has, in places, been made consistent with local plans. Though content was not generally changed, wording was altered to meet amendment form requirements.

C. Distribution and Administration of Funds

Reminder: The HPRP grant will be made by means of a grant agreement executed by HUD and the grantee. The three-year deadline to expend funds begins when HUD signs the grant agreement. Grantees should ensure that sufficient planning is in place to begin to expend funds shortly after grant agreement.

1. Check the process(es) that the grantee plans to use to select subgrantees. Note that a subgrantee is defined as the organization to which the grantee provides HPRP funds.

Competitive Process

Formula Allocation

Other (Specify: Generally Competitive w/ designated agencies for specific activity types)

General:

There are three broad areas where funding/programming will be focused:

- Prevention - Resources to keep tenants in their homes who have fallen behind due to some acute life circumstance, but who otherwise can maintain and sustain the cost of the dwelling;
- Diversion - Resources to divert those at high-risk of losing their home due to eviction or foreclosure. Mortgage assistance may not be provided with these resources.
- Rapid Re-Housing - Resources to help current homeless individuals and families locate affordable housing and enter the permanent market.

The State will utilize a mixed approach to distribute HPRP funds.

- Financial Assistance (short and medium term rental assistance) will be distributed through a regional single point of contact, be connected to sustainable income, selected through a competitive process, taking into account agency capacity to effectively and efficiently distribute funds.
- Centralization of such assistance will assure uniform operating procedures, efficiencies and minimize fraud.

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- The State will assure full geographic coverage is available through the agencies funded and will assure the needs of special target populations who are at risk of homelessness or are homeless are addressed.
- Service funding, including innovative programs and outreach and education, will be distributed through a competitive process, taking into account agency capacity, beneficiaries, geographic coverage. Existing mechanisms, such as the State's 211 system, will be utilized whenever possible.
- To the maximum extent practical, the State will attempt to centralize specific services, such as Financial Literacy, which are a requirement of assistance.
- Applications must demonstrate they can comprehensively meet the needs of the target population either directly or through collaborative efforts.
- Funds allocated to Data Collection and Evaluation will be distributed to the State agency(ies) responsible for administration of the HMIS, namely Rhode Island Housing and/or the Rhode Island Coalition for the Homeless. HMIS will be provided at a centralized agency for the purposes of data entry and monitoring of HPRP providers' compliance with HPRP data requirements. Technical assistance and training will be available to agencies new to the HMIS.
- Administrative funds will be retained by the State.

2. Briefly describe the process(es) indicated in question 1 above (limit 250 words).

Response:

Distribution processes for competitive grants will follow current protocols of:

1. Initial Program/Application Planning in Consultation w/HPRP Entitlement Communities
2. Application Workshop;
3. Application period;
4. Staff review of applications;
5. Recommendations;
6. Steering committee review process;
7. Award of funds and contracting.

A single RFP will be posted online. Either electronic copies, with submission of an original signature page, or hard copies, will be accepted.

The State and "entitlement" HPR programs will attempt to utilize a single "common" application for funding and will coordinate on the distribution of awards.

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A Steering Committee, with participation by the State and HPRP Entitlement communities, will be formalized in May/June, 2009. One of the first joint actions will be developing a document that will outline the overall HPRP strategy as well as shared goals, priorities and the implementation plan, consistent with this Amendment. This document will provide clear guidance to stakeholders, the public and potential applicants. The Steering Committee will also execute any necessary Memoranda of Agreement, finalize risk factors and priority populations, identifying common RFPs to be issued, develop proposal evaluation criteria, further detail coordinated budgeting, establish common performance measures, conduct proposal review, and ultimately participate in funding decisions.

Rhode Island's plan also addresses preventing discharge from institutions directly into homelessness consistent with interagency protocols.

3. Briefly describe the process the grantee plans to use, once HUD signs the grant agreement, to allocate funds available to subgrantees by September 30, 2009, as required by the HPRP Notice (limit 250 words).

Response:

Following HUD's approval of the State of Rhode Island plan, during the contracting phase, applications will be made available. Regional collaboration with centralized intake and coordination of functions such as uniform research based assessment of risk, outreach, case management, housing location, financial literacy, legal services, will be encouraged. The RFP will also seek applications to fill specific gaps identified by current research established through the HMIS and existing programs such as Rhode Island Housing First Program (permanent supportive housing for those who are chronically homeless, the United Way Homeless Prevention Program, and Community Action Programs' emergency housing assistance. These initiatives provide a foundation for the additional work that can be accomplished by the HPRP and will ensure that those served by HPRP are connected to mainstream programs. This method will promote systems change by demonstrating best practices to prevent homelessness and sustain housing on the community level.

Rhode Island's Housing First Program has proven that intensive case management will result in a very high housing retention rate even among those with co-occurring disorders who have been chronically homeless and will be a model for development of HPRP medium term rental assistance and rapid re-housing.

Rhode Island will continuously promote and reinforce the concepts of "no wrong door" and coordination among agencies as a strategy in coordinating HPRP among homeless and mainstream agencies and in reaching the community. Case coordination is a cornerstone of our "Action Plan to End Homelessness".

4. Describe the grantee's plan for ensuring the effective and timely use of HPRP grant funds on eligible activities, as outlined in the HPRP Notice. Include a description of how the grantee plans to oversee and monitor the administration and use of its own HPRP funds, as well as those used by its subgrantees (limit 500 words).

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Response:

There will be one new FTE employed by the Office of Housing and Community Development to oversee the HPRP. Under the supervision of the current Emergency Shelter Grants program administrator, this position will be responsible for fund distribution, tracking and reporting. This oversight will include in-office as well as on-site monitoring of subrecipient organizations. In-office monitoring will be based upon documents submitted by subrecipients, including applications, reports and financial drawdowns. The State will utilize a risk-based approach to identify on-site monitoring needs. The risk-based approach will take into account the amount of assistance, complexity of program and capacity of subrecipient.

Rhode Island will also assess success based upon preventing the increase in homelessness that has occurred due to Rhode Island's high unemployment and foreclosure rates along with the ongoing gap between housing wages and renter income.

Application will include performance measures for programs to measure progress in the use of the HPRP funds. Agencies will be required to track outcomes such as: Reducing the time in shelter; housing retention; and overall reduction in homelessness.

In order to demonstrate that homelessness prevention and rapid re-housing should be used to continue the systems transformation that is underway through our "Action Plan to End Homelessness" we will attempt to calculate the cost of the intervention as well as the savings. Our current Housing First evaluation, which is funded by the United Way of Rhode Island, has provided us with a model for this work and the United Way has shown interest in funding a similar evaluation of the HPRP.

Timelines for program implementation and expenditures will be required in every application and contract agreement and the staff will closely monitor these in line with HUD regulations. We anticipate beginning all activities no later than October 2009 and completing them prior to September 2012.

The State will build upon current capacity for compliance and monitoring efforts to allow for consistent monitoring of the performance of subgrantees. Advance planning with the State and other entitlement communities around performance criteria, HMIS administration and program evaluation will ensure effective monitoring is in place in advance of signing subgrantee agreements.

D. Collaboration

1. Briefly describe how the grantee plans to collaborate with the local agencies that can serve similar target populations, which received funds under the American Recovery and Reinvestment Act of 2009 from other Federal agencies, including the U.S. Departments of Education, Health and Human Services, Homeland Security, and Labor (limit 250 words).

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Response:

The State Housing Resources Commission, Office of Homelessness includes representatives from numerous State and non-profit organizations which are recipients of Recovery Act resources. Among these are the State's Department of Human Services and Department of Labor and Training (DLT). To maximize the benefit of the limited resources available, coordination of these other mainstream and ARRA initiatives will be assured. The State has and will continue to meet with these agencies to promote collaboration and recipient agencies will be made aware of other opportunities to better serve their target population. The Office of Housing and Community Development will seek to sign an MOA with the DLT in order to give priority in Workforce Investment Programs to those who are involved with HPRP assistance.

A new prevention initiative of United Way of RI (UWRI) refers people who contact the 211 system to rental/utility assistance. HPRP efforts will be coordinated with this initiative and knowledge base. The HPRP will also be able to expand upon HPRP through RI Emergency Food and Shelter Board funds and the State's Community Action Program (CAP) Emergency Housing Assistance. The State has existing emergency rental assistance programs currently operated by CAPs and 22 community based agencies through the UWRI. These programs provide a foundation for the additional work that can be accomplished by the HPRP and will ensure that those served by HPRP are connected to mainstream programs. This will promote systems change in demonstrating best practices to prevent homelessness and sustain housing on the community level.

2. Briefly describe how the grantee plans to collaborate with appropriate Continuum(s) of Care and mainstream resources regarding HPRP activities (limit 250 words).

Response:

Rhode Island's Continuum of Care Plan is a statewide plan to organize and deliver housing and services to meet the specific needs of people who are homeless as they move to stable housing and maintain self-sufficiency. It includes action steps to end homelessness and prevent return to homelessness. The importance of prevention/diversion is also key to successful implementing an effective plan. A variety of agencies which serve the homeless and at-risk population are represented on Continuum of Care planning groups. The State has consulted with these agencies in program design and to assure the program targets its resources most appropriately and coordinates with existing efforts whenever possible.

The State provides staffing for the Continuum of Care to assure coordination with existing efforts whenever possible. The State Office of Homelessness meets monthly and includes the members of the Continuum of Care Committee as well as providers, advocates, consumers and representatives of populations such as veterans, survivors of domestic violence, and those with behavioral health issues.

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Rhode Island's statewide Continuum of Care Plan is organized and is based upon the State's "Action Plan to End Homelessness." The state identifies permanent housing as our key strategy. It has successfully operated a Housing First program for chronically homeless disabled persons since 2006. This program connects people to SSI/SSDI and has used Medicaid reimbursement. With HPRP resources, Rhode Island will be able to successfully re-house a significant number of individuals and families (estimate 250) into permanent housing using this proven model of individualized case management.

Briefly describe how HPRP grant funds for financial assistance and housing relocation/stabilization services will be used in a manner that is consistent with the grantee's Consolidated Plan (limit 250 words).

Response:

Chapter 3 of the Rhode Island Consolidated Plan outlines the State's Homeless and Housing Needs Assessment. Section IX specifically addresses the needs of individuals and families who are homeless or at risk of becoming homeless. HUD's Continuum of Care gap analysis is contained in this plan. Rhode Island tracks information on the homeless population utilizing its shelter system through the Rhode Island Emergency Shelter Information project and a statewide Homeless Management and Information System. Common reasons for seeking shelter and the characteristics of the homeless population will be considered in designing a program to effectively serve the homeless and at-risk. The Office of Homelessness of the Office of Housing and Community Development and Rhode Island Housing, who submit the Consolidated Plan provide information and referral to those experiencing a housing crisis on a daily basis. Therefore the Consolidated Plan is based upon not only statistics but also on direct knowledge and experience on what causes homelessness and the resources necessary to address it.

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E. Estimated Budget Summary

HUD requires the grantee to complete the following table so that participants in the citizen participation process may see the grantee’s preliminary estimated amounts for various HPRP activities. Enter the estimated budget amounts for each activity in the appropriate column and row. The grantee will be required to report actual amounts in subsequent reporting.

| HPRP Estimated Budget Summary | | | |
|--|--------------------------------|-------------------------|------------------------------|
| | Homelessness Prevention | Rapid Re-housing | Total Amount Budgeted |
| Financial Assistance ¹ | \$500,000 | \$743,537 | \$1,218,570 |
| Housing Relocation and Stabilization Services ² | \$800,000 | \$1,000,000 | \$1,800,000 |
| Subtotal (add previous two rows) | \$1,300,000 | \$1,718,570 | \$3,043,537 |
| Data Collection and Evaluation ³ | | | \$75,000 |
| Administration (up to 5% of allocation) | | | \$164,133 |
| Total HPRP Amount Budgeted⁴ | | | \$3,282,670 |

¹Financial assistance includes the following activities as detailed in the HPRP Notice: short-term rental assistance, medium-term rental assistance, security deposits, utility deposits, utility payments, moving cost assistance, and motel or hotel vouchers.

²Housing relocation and stabilization services include the following activities as detailed in the HPRP Notice: case management, outreach, housing search and placement, legal services, mediation, and credit repair.

³Data collection and evaluation includes costs associated with operating HUD-approved homeless management information systems for purposes of collecting unduplicated counts of homeless persons and analyzing patterns of use of HPRP funds.

⁴This amount must match the amount entered in the cell on the table in Section A titled “Amount Grantee is Requesting.”

The State will continue to coordinate its Homeless Prevention and Rapid Re-Housing efforts with the "entitlement" cities of Pawtucket, Providence and Woonsocket. It is currently anticipated these communities will expend a substantial portion of their resources on the homeless prevention category. Amounts reflected above are estimates that may be adjusted as necessary and appropriate when State and local HPRPs resources are distributed in a coordinated/combined fashion.

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F. Authorized Signature

By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete, and accurate to the best of my knowledge. I also provide the required assurances and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)

Signature/Authorized Official - *Noreen Shawcross* 4/27/09
Date

Chief - Office of Housing and Community Development
Title