

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	City of Brockton
Name of Entity or Department Administering Funds	Building A Better Brockton, Inc. in conjunction with United Way of Greater Plymouth County
HPRP Contact Person (person to answer questions about this amendment and HPRP)	Joyce Tavon
Title	Coordinator, South Shore Regional Network to End Homelessness
Address Line 1	United Way of Greater Plymouth County
Address Line 2	928 West Chestnut Street
City, State, Zip Code	Brockton, MA 02301
Telephone	508-583-6306 x108
Fax	508-584-0240
Email Address	jtavon@uwgpc.org
Authorized Official (if different from Contact Person)	Don Walsh
Title	CEO, Building a Better Brockton, Inc.
Address Line 1	Building a Better Brockton, Inc./Brockton 21 st Century Corporation
Address Line 2	50 School Street
City, State, Zip Code	Brockton, MA 02301
Telephone	508-586-0021
Fax	508-559-7582
Email Address	dwalsh@brockton21.com
Web Address where this Form is Posted	www.brockton.ma.us

Amount Grantee is Eligible to Receive*	\$610,110
Amount Grantee is Requesting	\$610,110

*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:

The grantee worked with its subrecipients, the United Way of Greater Plymouth County (“United Way”) and Building A Better Brockton, Inc. (BBB), to carry out the citizen participation process. United Way was involved in the HPRP process given its role with related homelessness planning of resources. It convenes the Plymouth County Housing Alliance (the Brockton/Plymouth County Continuum of Care group) and the newly formed South Shore Regional Network to End Homelessness (which is carrying out homelessness prevention and rapid re-housing activities in Brockton and the region with funds from the state’s Interagency Council on Housing and Homelessness (ICHH)).

The grantee and United Way published a public notice regarding this proposed substantial amendment on April 22, 2009 in *The Brockton Enterprise*, the local general circulation newspaper. The notice stated that the grantee intended to apply for an allocation of HPRP funding, that it was soliciting community input through a public hearing, and was seeking to identify priority needs through a Request for Response process. The United Way emailed the Request for Response document to the Plymouth County Housing Alliance and regional network distribution list of 50-60 members on April 17, 2009. The grantee held a public hearing on April 29, 2009. Agencies that submitted applications for HPRP funds were required to attend the public hearing. The grantee also made the proposed substantial amendment available for public comment for a period of twelve days (April 30, 2009 – May 15, 2009). The substantial amendment was posted on the grantee’s website.

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

To be completed after the public comment period.

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.

Response:

To be completed after the public comment period.

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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(s) 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: _____)

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

Response:

The grantee and United Way issued a Request for Response (RFR) with an open period from April 17, 2009 to April 27, 2009. The RFR was intended to identify interested applicants, needs, and possible uses of HPRP. Applicants needed to complete a short application and attend the public hearing. The RFR included guidance regarding HUD requirements and Brockton priorities. The grantee highlighted the planning that had already been done by the Plymouth County Housing Alliance, the Ten-Year Plan to End Chronic Homelessness in Brockton, the Ten-Year Plan to End Family Homelessness in Plymouth County, and the culmination of this prior planning: the South Shore Regional Network to End Homelessness. The RFR document stated the grantee's strong preference for HPRP proposed uses integrated with the regional network, given the network's detailed plan for Brockton of homelessness prevention and rapid re-housing. Additional subgrantee selection criteria concerned HMIS reporting, rapid use of funds within 24 months, and capacity to handle HUD HPRP reporting. Preference would also be given to targeting participants at or below 30% of area median income.

United Way received eight applications. It will select subgrantees with input from a small review group of non-applicants, a process that is consistent with the one used for project selection for the Continuum of Care.

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:

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The grantee intends to select subgrantees and to allocate funds by June 1, 2009. It has used the planning by the South Shore Regional Network, local homelessness data, and the citizen participation process to inform funding allocations. Once HUD signs the grant agreement, the grantee through its sub-recipients, United Way and Building a Better Brockton, will contract with the subgrantees and will execute contracts by September 30, 2009. Subgrantees will enter contracts with United Way and the City of Brockton. The contracts will incorporate HUD's guidance governing HPRP, the grantee's HPRP priorities for integration of plans and goals with the South Shore Regional Network, and specific outcome measures. Subgrantees will need to comply with all HMIS and other HUD reporting requirements.

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).

Response:

To ensure for timely use of HPRP funds for eligible activities, the grantee gave strong preference in its RFR to applicants already integrated with the South Shore Regional Network's homelessness prevention and rapid re-housing activities. The grantee will require subgrantees to submit regular reimbursement requests, along with backup documentation regarding expenses in each eligible activity. The grantee will ensure that the subgrantees complete the initial performance report due on October 10, 2009. Subgrantees will also need to complete all subsequent quarterly and annual reports. The grantee, working with its subrecipients, will take part in the IDIS and HMIS reporting requirements. United Way is serving as a subrecipient because of its current involvement in oversight of HMIS reporting and in monitoring of the South Shore Regional Network subgrantees. The HPRP monitoring process will be aligned with that one, regarding compliance with protocols on use of client financial assistance, regular meetings of subgrantees to collaborate and share best practices, site visits by United Way, and regular review of subgrantee data and outcomes.

A small portion of funds have been set aside for data collection (\$10,000) which will be carried out through the United Way in coordination with existing HMIS activities. United Way and Building a Better Brockton have entered a subrecipient agreement with the grantee that include monitoring of its own HPRP funds for administration.

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).

Response:

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The grantee is working with United Way, which also convenes the Local Board for the Emergency Food and Shelter Program under Homeland Security's Federal Emergency Management Agency. United Way will coordinate HPRP with the additional EFSP funds through the American Recovery and Reinvestment Act (ARRA). As a convener of the South Shore Regional Network, United Way works closely with the Department of Transitional Assistance which will receive ARRA funds through Health and Human Services; it also coordinates with the McKinney-Vento Educational Liaisons, which will benefit from ARRA funds through the U.S. Department of Education. United Way takes part in statewide meetings of the Interagency Council on Housing and Homelessness and its regional networks. These forums include agencies receiving ARRA funds through these other federal agencies. United Way will seek collaboration and coordination of resources and planning to benefit the target populations in Brockton.

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:

As noted, the grantee is working with United Way, which is the convener of the Brockton/Plymouth County Continuum of Care. Subgrantees need to be active members of the Continuum of Care and the Regional Network and to coordinate their HPRP activities with these efforts. United Way is bringing together the Continuum of Care and the Regional Network in order to ensure for collaborative planning in addressing homelessness prevention and rapid re-housing in place of fragmented and disparate activities. For example, it has begun to convene planning meetings with the state Department of Transitional Assistance and area homeless shelters to improve identification, assessment, and rapid re-housing of homeless families. The collaborative activities of the Continuum of Care and Regional Network also include ensuring that the target population has access to mainstream resources (SSI, SSDI, Social Security, Medicaid, Veterans Benefits, Food Stamps, etc.) to increase their income in order to sustain housing. HPRP activities will be integrated with these activities.

3. 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:

The grantee proposes to target approximately 40% of the funds for Homelessness Prevention and 60% for Rapid Re-Housing. Given the enormous numbers of homeless and imminently homeless people currently seeking assistance from Brockton shelters and service providers, at least 68% of total funds will go directly for financial assistance. The goal is to get funds to people in need as rapidly as possible in order to prevent and end their homelessness. Approximately 25% will

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be used for staffing with a strong preference for building on the activities being developed through the regional network, rather than stand-alone projects or other staffing needs. The grantee expects that approximately 60% of resources will benefit families and 40% unaccompanied individuals.

These uses of HPRP grant funds are consistent with the Brockton Consolidated Plan. The Plan identifies the need for more housing for families and individuals in Brockton's shelters. The grantee stated a preference for using the majority of financial assistance for short- and medium-term rental assistance so more homeless people will be moved to housing. The Consolidated Plan also presents the goals of the Ten Year Plan to End Chronic Homelessness. The South Shore Regional Network derived its workplans in part from the Ten Year Plan, including to reduce inappropriate discharges to shelters from state systems of care and to provide more permanent supportive housing for the chronically homeless. HPRP is being integrated with the South Shore Regional Network in ways that are consistent with the Consolidated Plan.

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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	\$166,642	\$249,963	\$416,605
Housing Relocation and Stabilization Services ²	\$61,000	\$92,000	\$153,000
Subtotal (add previous two rows)	\$227,642	\$341,963	\$569,605
Data Collection and Evaluation ³			\$10,000
Administration (up to 5% of allocation)			\$ 30,505
Total HPRP Amount Budgeted⁴			\$610,110

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.”

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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

Date

Title