

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 Providence
Name of Entity or Department Administering Funds	Department of Planning and Development, City of Providence
HPRP Contact Person (person to answer questions about this amendment and HPRP)	Garry Bliss
Title	Director of Compliance
Address Line 1	400 Westminster Street
Address Line 2	
City, State, Zip Code	Providence, RI 02903
Telephone	401-351-4300
Fax	
Email Address	Gbliss@providenceri.com
Authorized Official (if different from Contact Person)	Thomas E. Deller
Title	Director, Department of Planning and Development
Address Line 1	Same as above
Address Line 2	Same as above
City, State, Zip Code	Same as above
Telephone	Same as above
Fax	401-351-9533
Email Address	Tdeller@providenceri.com
Web Address where this Form is Posted	www.providenceplanning.org

Amount Grantee is Eligible to Receive*	\$2,303,402
Amount Grantee is Requesting	\$2,303,402

*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) 11 days prior to hearing date of Wednesday, April 29. An additional notice was published in a newspaper that primarily serves the minority community. The formal public hearing was held at 4:00 PM, April 29, in the City of Providence Department of Planning and Development. The facility is centrally located, served by public transit, and handicapped accessible. Additional accommodations for individuals with disabilities and non-English speaking persons were available upon request.

In addition, the City conducted and participated in several meetings with stakeholders in the development of the program design. Meetings included:

- 3/30 Rhode Island HPRRP Entitlement Communities & State of Rhode Island
- 4/2 State Continuum of Care, Policy Academy, Office of Homelessness, Public & Private Homeless Service Provider Agencies
- 4/9 Corrections & Re-Entry Agencies, Partners, and Population
- 4/23 Providence-Serving Homeless Agencies and Partners
- 4/27 Providence-Serving Homeless Agencies and Partners

During the public comment period, comments were actively sought. The plan was posted to the Department of Planning web site, the City's ARRA/Recovery web site, a link was provided on the State's web site, and the document was e-mailed to key stakeholders for comment.

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.

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:

Comment: Comments were received from two organizations regarding the critical role legal services can play in preventing homelessness – representing tenants at

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risk of eviction, representing tenants of foreclosed properties, and advocating for individuals denied public housing assistance. Both organized urged that funding be allocated for legal services.

Response: The draft plan offered for public comment did specifically identify legal services and mediation services as intended components of the final program. The comments received from Rhode Island Legal Services and the Pro Bono Collaborative at the Roger Williams School of Law reinforced the commitment to include legal services in the final program design to ensure sufficient funds were dedicated to this component. Initial discussions with the State and other Entitlement Communities indicate this is a shared commitment. The responses also provided what useful guidance on the potential scope of legal services, the role such services could play as part of a comprehensive homelessness prevention strategy, and served to identify the capacity that exists within the Rhode Island legal community to address this need.

Comment: The United Way of Rhode Island provided advice and lessons learned from their experience funding homelessness prevention activities. They identified the following as critical components of the strategy: Coordination of efforts, with special value seen in common data and a strong network of local connections; Mass advertising to ensure those in need of assistance know where to turn for help; Well-trained case managers able to connect individuals in need with the right resources to address the immediate need/crisis as well as longer-term problem solving and stabilization; Capacity for quick and flexible response, recognizing the need to respond to client needs as they arise; supportive and positive interactions with clients.

Response: Many of the issues raised by the United Way were, as their submission acknowledged, were already addressed in the draft plan made available for public comment. The United Way comments did highlight the particular role the statewide 2-1-1 system could play as a single phone-in resource for individuals seeking referrals to appropriate agencies. 2-1-1 is now specifically mentioned in the plan. As well, the revised plan speaks with greater clarity to the qualitative expectations for case management, and there is now language addressing the need to promote the program through mass media including advertising.

Comment: Comments were received encouraging coordination of the HPRRP activities with Neighborhood Stabilization Program activities. In particular, the comments recommended the goal of using NSP funds to support the rapid re-purchase of foreclosed multi-family homes prior to tenant eviction.

Response: Addressing the needs of tenants at risk of homelessness due to eviction by a foreclosing bank is a priority of this initiative. Local experience to date indicates banks are moving very quickly to evict tenants, thus making coordination with NSP funding a very real challenge. However, the potential value of this approach to preventing homelessness, and the value -- barring the ability to act

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prior to eviction – of quickly getting properties re-purchased and re-occupied merits close consideration during implementation.

Comment: Comments were received from the Rhode Island Coalition for the Homeless. Four issues were discussed: The draft plan proposed a funding allocation of 40% for prevention and 60% for rapid re-housing. The Coalition recommended a 50%/50% split at the onset as it is too early to define an ideal split of resources. The Coalition strongly supported the focus in the draft plan on coordination and strategic systems change as investments that would ensure long-term impact of this one-time funding. The Coalition urged this language to be retained and strengthened. The Coalition supported the focus on coordinating with the State and with other ARRA resources in the draft plan and urged this language be retained and strengthened. The Coalition recommended against setting aside any funding in advance for a particular agency, singling out legal services as one field where they had heard discussion of a potential “set-aside.”

Response: The funding is now split evenly between prevention and rapid re-housing. Experience and client demand may dictate the need for a different allocation. The language pertaining sustainable systems change through coordination and capacity building has been strengthened. Additionally, this issue was an agenda item at a joint planning meeting held between the State the Entitlement Communities after the close of the public comment period and there was consensus that this grant must be used as a mechanism for achieving greater coordination – and greater effectiveness – across the sector. There is no set-aside for any specific service or organization at this point. It is fully anticipated that legal services will be defined as an activity that will be funded and must be provided, but no determination has been made to date about a particular means of providing that service.

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: _____)

Funding/programming will be focused in three broad, strategic areas:

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- 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 from homelessness those at high-risk of losing housing due to eviction or foreclosure.
- Rapid Re-Housing - Resources to help current homeless individuals and families locate affordable housing and enter the permanent housing market in a way that is economically sustainable with affordable housing complemented with, when needed, improved job skills – with a focus on newly homeless.

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

Response:

Rental Assistance:

- The City, in cooperation with the State of Rhode Island and other entitlement communities, will request proposals for a regional single point of contact for short- and medium-term rental assistance. Selection will be based on agency capacity to effectively and efficiently distribute funds.
- Centralizing assistance will assure uniform operating procedures, efficiencies and minimize fraud.

Service:

- The City, in cooperation with the State and other entitlement communities, will seek proposals for innovative service programs, outreach, education, and overall coordination of activity in the sector. Selection will be based upon proven organizational capacity, overall strength of proposals, inter-agency cooperation and coordination across the sector, funds leveraged, strategic targeting of services to meet high priority populations, and more.
- To the maximum extent practical, the City, in cooperation with the State and other entitlement communities, will centralize and/or establish uniform standards for service delivery.

Data Collection, Evaluation, and Administration:

- The City anticipates collaborating with the State and other entitlement communities for data collection and evaluation. HMIS will be provided at a centralized agency for the purposes of data entry and monitoring of HPRP service provider 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 City and will be awarded to subgrantees as appropriate. Additionally, the City anticipates that cooperative administration with the State and other entitlement communities may result in some pooling of administrative funds.

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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:

The City, State, and other entitlement communities have committed to building upon and deepening the common planning, priority setting, and strategy development employed to date between the submission of Amendments and the signing of grant agreements.

An HPRP Steering Committee, with participation by the City, State and other entitlement communities, will be formalized before HUD responds to the Substantial Plan Amendments. One of the first joint actions will be issuing a document that will outline the overall HPRP strategy as well as the shared goals, priorities, and the implementation plan for HPRP. This document will provide clear guidance to stakeholders, the public, and potential applicants. The HPRP Steering Committee will also execute any necessary Memoranda of Agreement, finalize risk factors and priority populations, identify common RFPs to be issued, develop proposal evaluation criteria, further coordinate budgeting, establish common performance measures, conduct proposal review, and make funding decisions. The HPRP Steering Committee will ensure an equal voice and role for the partners funding this initiative, ensuring the efforts of all are unified while special local needs and priorities receive appropriate attention.

For each activity (e.g. outreach, intake/risk assessment, rental assistance administration, case management, housing location, financial literacy, mediation and legal services, short- and long-term capacity building for increased effectiveness and inter-agency coordination), a single RFP will be developed for competitive proposals.

A common funding application and fund award process will ensure maximum potential coordination between funders, alleviate the burden on agencies applying for funds, and ensure administrative funds are deployed efficiently.

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:

Coordination between the State and entitlement communities through common RFPs, contracting, and more will allow us to begin eligible activities rapidly. As an entitlement community, the City of Providence has a robust compliance function that distributes and oversees the effective and timely use of more than \$5 million in CDBG, ESG, HOME and HOPWA funds annually.

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In order to ensure full adherence to all requirements of ARRA – including all reporting requirements and ensuring the effective use of ARRA funds – the City of Providence has established an inter-departmental ARRA Compliance Council, overseen by the Mayor’s Chief of Administration. This Council is developing guidelines, processes, and standards for all City Departments that will receive ARRA funds. The Department of Planning is an active participant in the Compliance Council.

Given the compact geography of Providence, and of the State, and the deep experience the City has with agencies that we anticipate will submit respond to RFPs, the City believes building upon current compliance and monitoring efforts, along with coordinated efforts through additional staffing at the State level, will 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. The City anticipates utilizing its existing compliance capacity and coordinating additional actions with the increased administrative capacity planned by the State.

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:

Shortly after ARRA was enacted, Mayor Cicilline signed an Executive Order creating the ARRA Task Force that includes his most senior staff along with the heads of every City department that will receive or be eligible to apply for ARRA funds. This Task Force meets regularly to coordinate grant submissions and to ensure alignment between ARRA and non-ARRA funded activities.

This Task Force includes the Superintendent of the Providence School System, Chief of Police, Director of the Workforce Investment Board, Director of the Department of Planning and Development, Director of the Mayor’s Substance Abuse Prevention Council, Director of the Pathways to Opportunity Office, Director of the Providence After School Alliance, Director of the Providence Community Action Program, and the Director of the Providence Public Housing Authority, Director of Emergency Management, and more.

Additionally, in order to implement the anti-poverty strategy developed by the Poverty, Work and Opportunity Task Force, Mayor Cicilline created the Pathways to Opportunity Office and Advisory Committee. Both ensure the effective coordination of all related City departments as well as residents, community based organizations, private sector partners, and funders. Pathways to Opportunity

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ensures a well-established mechanism is in place prior to receipt of HPRP funds to maximize cooperation.

Unique opportunities for homelessness prevention exist at the municipal level. For example, with training developed under HPRP, the City's community policing effort, school department personnel including teachers, after school providers, and more can serve as an "early warning" system for families at risk and direct them to HPRP resources.

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. Prevention and diversion are key to an effective plan. A variety of agencies which serve the homeless and at-risk population are represented on Continuum of Care planning groups.

The City is currently active in COC activities. As stated in the State's Consolidated Plan and cited in the City's Consolidated Plan: "(B)ecause of its size, Rhode Islanders, including the homeless, move readily between cities and towns to accomplish activities of daily living. Services tend to be centralized and most agencies have statewide or regional service delivery areas. Due to the unique geography and close relationships among service providers, the Housing Resources Commission and community providers continue to promote a coordinated statewide Continuum of Care as the best system for addressing homelessness in the state."

The City is actively engaged with the mainstream resources that will be utilized via the HPRP, including the United Way of RI's 211 system providing referrals to rental and utility assistance, the Rhode Island Emergency Food and Shelter Board, and Providence Community Action Program rental assistance and emergency housing 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 City's Consolidated Plan Homeless Strategy analyzed the nature of homelessness in Providence at the time of its issuance in 2005. The homeless challenge in Providence is defined by two factors: 1. A large portion of the state's

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homeless report Providence as their last place of residence. (30% according to the most recent data) 2. Because most shelter beds are located in Providence, more service agencies are located in the city, and the Kennedy Plaza in downtown Providence serves as the statewide bus hub, the homeless from other communities across Rhode Island gather in Providence.

The Consolidated plan states: “The lack of affordable housing and lack of supportive services are the major obstacles in addressing homelessness.” The HPRP strategy will directly address these areas of need by connecting families and individuals at risk of homelessness with affordable, sustainable housing/affordable living options and by supporting families and individuals with intensive case management that will ensure the circumstances driving the risk of homelessness are addressed in a comprehensive, effective, and enduring way.

Given the impact of the foreclosure crisis on homelessness, we believe an investment in mediation services, legal services, case management, coordination with job training, coupled with rental and/or relocation assistance, will prove truly effective in addressing the needs of those new to or at risk of homelessness.

Additionally, by working to increase overall capacity, coordination, and effective service delivery across the sector, the HPRP strategy will achieve sustained systemic improvements in the ability to prevent and/or respond quickly to homelessness.

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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.

Note: The City of Providence draft budget below is based on the model allocations provided in “Creating a Plan for the Homeless Prevention Fund,” from the National Alliance to End Homelessness. The City is actively engaged in discussions with the State and the other entitlement communities to coordinate final budgeting.

HPRP Estimated Budget Summary			
	Homelessness Prevention	Rapid Re-housing	Total Amount Budgeted
Financial Assistance ¹	\$667,986.50	\$667,986.50	\$1,335,973
Housing Relocation and Stabilization Services ²	\$403,095	\$403,095	\$806,190
Subtotal (add previous two rows)	\$1,071,081.50	\$1,071,081.50	\$2,142,164

Data Collection and Evaluation ³	\$46,068
Administration (up to 5% of allocation)	\$115,170
Total HPRP Amount Budgeted⁴	\$2,303,402

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)

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Thomas E. Deller AICP	
Signature/Authorized Official	Date
<hr/>	
Director, Department of Planning and Development	
Title	