

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 North Carolina
Name of Entity or Department Administering Funds	Office of Economic Recovery and Investment
HPRP Contact Person (person to answer questions about this amendment and HPRP)	Martha Are
Title	Homeless Policy Specialist
Address Line 1	Mail Service Center 20308
Address Line 2	
City, State, Zip Code	Raleigh, NC 27699-0308
Telephone	919-733-1433
Fax	919-733-2422
Email Address	martha.are@nc.gov
Authorized Official (if different from Contact Person)	Dempsey Benton
Title	Director, Office of Economic Recovery & Investment
Address Line 1	Mail Service Center 20308
Address Line 2	
City, State, Zip Code	Raleigh, NC 27699-0308
Telephone	919-733-1433
Fax	919-733-2422
Email Address	dempsey.benton@nc.gov
Web Address where this Form is Posted	http://www.nccommerce.com/en/CommunityServices/CommunityDevelopmentGrants/CommunityDevelopmentBlockGrants/ConsolidatedPlanningProcess/

Amount Grantee is Eligible to Receive*	\$22,157,468
Amount Grantee is Requesting	\$22,157,468

*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 State has complied with its citizen participation plan by accepting timely public comments, hosting a public hearing, and advertising the public hearing appropriately. The State also hosted Q&A conference calls for interested stakeholders. The substantial amendment was drafted by the Office of Economic Recovery and Investment's (OERI) HPRP Work Group. Members include the state's Consolidated Plan partners and other state agencies, as well as statewide stakeholder membership groups including the N.C. Housing Coalition (NCHC), the N.C. Coalition to End Homelessness (NCCEH) and the N.C. Justice Center. Stakeholders also participated in sub-committees created to explore content issues such as consumer applicant risk factors and target populations. The substantial amendment was made available for public comment on May 1, 2009 and a public hearing was held at the Division of Community Assistance on May 4, 2009. The public comment period was over on May 13, 2009, giving the state a minimum of 2 days to review comments.

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:

TO BE COMPLETED AFTER PUBLIC COMMENT PERIOD

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.

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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: Combination of direct allocations and competition)

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

Response:

Some funds will go to nonprofits providing unique statewide HPRP services. SocialServe will provide a statewide on-line listing of available affordable rental housing. NCHC houses the HMIS provider for 99 counties. Furthermore, three communities have Housing Support Teams that have provided HPRP type services for 26 months but lose their funding June 2009. HPRP funding allows all communities to benefit from the expertise and capacity of these experienced teams.

Other state funds (approximately \$18M) will be allocated competitively. OERI will publish an RFA for nonprofit and local government response.

In communities with 10 Year Plans to End (Chronic) Homelessness applicants required to present their HPRP proposals to the entity responsible for implementing the Plan for review, feedback, and encouragement of partnerships. In communities without such plans, applicants must present proposals the local CoC. The 10 Year Plan committee and/or CoC is asked to encourage collaboration and consolidation in communities where multiple parties wish to apply.

Applicants will be evaluated on multiple criteria including:

- financial and reporting capacity,
- strength of partnership with employment programs, TANF, homeless education, EFSP and other programs, and
- the strength of their plans to assist program participants in achieving housing stability (including partnerships with subsidized and private housing providers).

The State may use additional criteria, such as geographic representation, to make final decisions.

The state expects that most applications will be for prevention and rapid re-housing, but some areas may submit proposals for one or the other exclusively.

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

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Response:

A committee of state-level agencies involved in housing and homelessness will review the proposals. It is the State’s intention to have made decisions about potential sub-grantees on or before September 1. Once the State’s contract with HUD has been signed the State will finalize grant agreements with sub-grantees.

Timeline for HPRP Application and Award Process

Approximate Date	Activity
May 1	State posts the Substantial Amendment to the Consolidated Plan on the internet and begins the public hearing process.
May 4	State holds public hearing on the Substantial Amendment.
May 6 and May 8	State holds Q&A conference calls on the Substantial Amendment
May 18	State submits the Substantial Amendment to HUD as its application for HPRP funding.
July 2	HUD’s review of the Substantial Amendments is expected to be complete.
July 6	State makes the Request for Applications available.
July	State hosts Q&A conference calls on the RFA: Dates TBD
July 30	Applications are due to the State
On or before September 1	HUD signs HPRP agreement with the State, which makes the funds available to be awarded within North Carolina.
During or Before the Month of September	State signs contracts with award recipients.
October 5	Initial Performance Reports from sub-grantees are due to the State. (The State will provide information about reporting requirements when HUD’s reporting requirements are known.)
October 10	Initial Performance Report from the State is due to HUD.

- 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:

State government's HPRP direct expenditures will be limited to administrative activities.

Project applications will be required to detail how communities will meet timeliness standards and what checks and balances applicants will have in place to assure funds are spent on eligible and appropriate activities. Applicants will also be required to report any substantial performance issues raised in their expenditure of other federal funds (SHP, S+C, CDBG, etc.) within the past five years, and this information will influence application decisions.

The state expects most sub-grantees to spend up to six months ramping up their program. In order to expend 60% of the program funds within the first two years, sub-grantees are expected to spend at a significantly higher rate between months 7 – 24, especially the second year of the program once they have more experience and expertise in obtaining program outcomes.

OERI's HPRP work group will continue to meet throughout the duration of the HPRP program, review quarterly and annual reports to HUD, and provide necessary input and guidance for the project. The state may require additional sub-grantee reports if deemed necessary to effectively monitor appropriate and efficient use of funds.

The State will have primary responsibility for overseeing financial processes related to HPRP. HFA will establish procedures for tracking expenditures by sub-grantees, including fund advances. Financial reports to HFA will include detailed expenditures with copies of receipts.

The State will have primary responsibility for overseeing programmatic processes related to HPRP. The State will monitor program reports, program outcomes and eligible expenditures. All sub-grantees (except domestic violence programs) will be required to participate in CHIN, the statewide HMIS. (Although the state will fund CHIN directly to ensure adequate HMIS infrastructure, sub-grantees may request additional HMIS funding for data entry.) CHIN will provide the State with outcome reports at least monthly. These reports will include, but are not limited to, data on numbers of households identified as at risk of homelessness, numbers of households identified as homeless, number of households assisted with financial assistance and/or services, the number of households assisted who do not become homeless, and the cost per household assisted.

The State will be responsible for financial monitoring of program sites, and will complete at least one monitoring visit per sub-grantee during the first year. The number of site visits for all three years will depend, in part, on sub-grantee performance.

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The State agencies directly involved will meet periodically to conduct a joint overview of the HPRP program and the status of each sub-grantee. Contracts with sub-grantees will identify a process for reallocation of funds for poor performance.

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:

Collaboration and coordination happens at the local level with supportive policies from state and federal counterparts. Therefore, applications from local communities will be evaluated, in part, on memoranda of understanding that the local applicant has with the agencies that administer ARRA programs in that local community.

Applications will be evaluated on the type and strength of the partnerships between the various agencies administering ARRA programs and other support programs that serve vulnerable populations. For example, an applicant might introduce the HPRP program to local Employment Security Commission and Job Link center staff, work with those agencies to identify partnership opportunities and establish protocols, identify how outcomes will be tracked for referrals made between the HPRP program and employment partners, and undertake ongoing follow-up/monitoring conversations. Similar activities would be expected for organizations involved with ESG, SHP, S+C, TANF, EFSP, Education, Child Care, and other ARRA and non-ARRA mainstream federal programs, as well as aligned state-run programs.

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:

Agencies submitting HPRP applications will be required to work with their local Continuum of Care or jurisdictionally based 10 Year Plan committee to improve coordination and identify appropriate partners for the project. (All N.C. 10 Year Plan communities have partnerships between the 10 Year Plan entity and the local

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CoC.) Applications also will be evaluated, in part, on the strength of their collaboration with local partners. These partners include, but are not limited to:

- Employment Security Commission
- Public Housing Authorities
- Division of Social Services
- Legal services offices
- Social Security
- Statewide programs such as the N.C. Housing Finance Agency's Home Protection Program, N. C. CareLine, etc.
- and other mainstream resource administrators.

Partnerships will be documented through MOAs required in the application process and evaluated for strength in referral and engagement *to and from* the HPRP program and community agencies. These partner relationships will insure maximum outreach to eligible HPRP participants as well as leverage of all resources for which the program participants are eligible.

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 2006-2010 North Carolina Strategic Consolidated Plan identifies the high-priority populations in North Carolina to be:

- 1) Homeless families and individuals
- 2) Nonhomeless persons with special needs
- 3) Urban renters earning 0-30% of MFI
- 4) Rural renters earning 0-50% of MFI
- 5) Existing Urban Homeowners earning 0-30% of MFI
- 6) Existing Rural Homeowners earning 0-50% of MFI

Housing homeless people and preventing homelessness among nonhomeless people, particularly those with special needs or extremely low incomes, are among the state's highest priorities.

The Consolidated Plan explicitly lists a broad range of activities to serve people who are homeless or at risk of homelessness; these activities include providing operating costs for homeless providers, providing supportive services for homeless people, providing funds for the construction and rehabilitation of emergency shelters, providing supportive housing, and preventing homelessness. All the activities the state intends to accomplish with HPRP funds are aligned with the Consolidated Plan, either explicitly in the letter of the Plan (i.e. "preventing homelessness") or in the spirit of the Consolidated Plan (because in the Consolidated Plan helping homeless people is explicitly listed as one of the state's highest priorities).

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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	\$ 4,683,191	\$ 7,024,787	\$ 11,707,978
Housing Relocation and Stabilization Services ²	\$ 3,122,127	\$ 5,333,191	\$ 8,455,318
Subtotal (add previous two rows)	\$ 7,805,318	\$ 12,357,978	\$ 20,163,296
Data Collection and Evaluation ³			\$ 886,299
Administration (up to 5% of allocation)			\$ 1,107,873
Total HPRP Amount Budgeted⁴			\$ 22,157,468

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