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 Alabama
Name of Entity or Department Administering Funds	Alabama Department of Economic and Community Affairs
HPRP Contact Person (person to answer questions about this amendment and HPRP)	Shabbir Olia
Title	Program Manager Community and Economic Development Programs
Address Line 1	401 Adams Avenue
Address Line 2	PO Box 5690
City, State, Zip Code	Montgomery, Alabama 36103-5690
Telephone	334-242-5468
Fax	334-353-3527
Email Address	shabbir.olia@adeca.alabama.gov
Authorized Official (if different from Contact Person)	Bill Johnson
Title	Director, Alabama Department of Economic and Community Affairs
Address Line 1	401 Adams Avenue
Address Line 2	PO Box 5690
City, State, Zip Code	Montgomery, Alabama 36103-5690
Telephone	334-242-5090
Fax	334-242-5099
Email Address	bill.johnson@adeca.alabama.gov
Web Address where this Form is Posted	www.adeca.alabama.gov/C12/HPRP/Document%20Library/public%20hearing-hprpsubamendform%20web.doc

Amount Grantee is Eligible to Receive*	**$13,328,942**
Amount Grantee is Requesting	**$13,328,942**

*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 Notice of Public Hearing and Notice of Availability were published in the four major daily newspapers: The Montgomery Advertiser, The Birmingham News, The Huntsville Times and The Mobile Register on April 14, 2009. In an effort to broaden public participation, copies of the Notice of Public Hearing and Notice of Availability were mailed to chief elected officials, regional planning and development commissions, and e-mailed to community action agencies, continuum of care groups and non-profit organizations. The Notices were also published on ADECA's web site at www.adeca.alabama.gov and e-mailed to ADECA's e-mail distribution list of interested parties. The notices were also published in Spanish on ADECA's web site. All notices offered assistance to persons with disabilities or special needs.

   The hearing was held on April 30, 2009 in the 7th Floor Auditorium of the Alabama Center for Commerce in Montgomery, with 90 persons attending. Copies of the draft action plan substantial amendment were distributed to all persons attending the public hearing. In addition, a hard copy was made available for review at the ADECA office in Montgomery. A comment period was allowed from May 1, 2009 to May 13, 2009. Individuals were offered the opportunity to comment verbally at the public hearing or in writing via formal correspondence, fax, or e-mail. ADECA's web site also offered the ability to submit written comments.

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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:

   Comments Received at the Public Hearing:

   Comment: Who should written comments be sent to?
   Response: Comments may be sent to Bill Johnson, Shabbir Olia or Shonda Gray.

   Comment: How will ADECA monitor a local non-profit organization's approval by local government?
   Response: A letter or certification will need to be included in the proposal to ADECA.

   Comment: If a non-profit operates in multiple counties, will letters or certifications be required from each county?
   Response: Letters or certifications will be required from every city where there is an office.

   Comment: There is a correction for the handout for Continuum of Care groups. Stephanie Hall is the current president for the Mid-Alabama Coalition for the Homeless.
   Response: We will make the change and update the form on ADECA's website.

   Comment: What percentage of funds is budgeted for each activity?
   Response: Five percent has been set aside for administration and 5% for data collection. Of the remaining balance, 60% has been set aside for homelessness prevention and 40% for rapid re-housing.

   Comment: The State should consider that many non-profit agencies are unfamiliar with the HMIS and the costs associated with administering it. Prospective applicants should include a plan to implement the HMIS and a budget for the associated fees along with their proposal.
   Response: Thank you.

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Comment: What is the difference between prevention in the HPRP and the ESG program?
Response: The HPRP cannot assist with mortgage payments. Also, ESG payments are made on a reimbursement basis. The HPRP funds may be done in advancements.

Comment: Does the data collection activity include HMIS data?
Response: Yes.

Comment: Would the director of the non-profit agency supply the certification or the city council?
Response: The city council would supply the certification. Certification must come from elected officials.

Comment: Please clarify collaboration for this program.
Response: Applicants must show how they will work with other agencies that will serve similar target populations to ensure that the needs of program participants are met. Collaboration is also important to ensure that services are not duplicated.

Comment: What are the credentials of the case managers?
Response: The State won't set minimum standards; most agencies already have their own standards.

Comment: What happens when the funds are gone and the participants have made bad decisions and poor choices? What is the long-term benefit of this program?
Response: Case management is an important part of this program, linking program participants to various services. The financial assistance provided will only be temporary. It is anticipated that program participants will become self-sufficient and will be able to maintain their housing after the program ends.

Comment: Some programs such as disaster relief are under-funded. Many families in the Mobile area still need housing assistance as a result of the past hurricanes. Will there be any collaboration with FEMA for the use of HPRP funds?
Response: These funds have specific requirements as to who is eligible to receive assistance. People affected by disasters and chronically homeless individuals often have significantly greater needs than what the HPRP can provide.

Comment: Can families that will be evicted from FEMA trailers qualify for assistance under the HPRP?
Response: They may qualify; we will check with HUD. Remember the actual dollars will not be available in time to help families that are currently about to be evicted. Funding will not be available until after September.

Comment: The income requirement should be based on the prior month's income instead of the prior year's income.

Response: The State has consulted the HPRP Help Desk regarding this issue. The State was told to use the former Section 8 Program guidelines to determine eligibility. The State requested clarification and has not received a second response at this time.

Comment: Can you elaborate on eligible activities in housing relocation?
Response: Case management, outreach and engagement, housing search and placement, legal services and credit repair are eligible.

Comment: Are you envisioning that this program will do all these things possibly in collaborating with a lot of different agencies and the government?
Response: Based on the need in the service area and the agency's capacity to carry out the proposed activities, case managers will play an important role in ensuring needs not addressed in the HPRP are met through other mainstream resources. Collaboration with other agencies will be necessary.

Comment: When these funds come to ADECA, will they still be federal?
Response: Yes. Applicants need to apply for a DUNS number and complete the Central Contractor Registration.

Comment: How will vouchers be handled? Can participating agencies receive funds in advance?
Response: HPRP advances can be done. There should be a reasonable expectation to expend the funds within a timely fashion if they are received in advance.

Comment: What are the audit requirements? Will the main grantee be responsible for the audit?
Response: The State's grantee will be responsible for the audit requirements.

Comment: Are audit costs covered under the program?
Response: Yes.

Comment: Can you fund activities for individuals?
Response: Eligible activities will be funded. If a person is eligible to receive assistance, they may receive assistance from a funded activity.

Comment: Do all eligible activities have to be included in a proposal?
Response: No. Activities included in proposals should be based on need in the service area and the capacity of the agencies to implement the program. Collaboration and coordination with other agencies is an option to provide other services.

Comment: How does the program collaborate with CDBG?
Response: The State has to show how the program funds will be used in a way that is consistent to the Consolidated Plan. CDBG and other programs covered in the

Consolidated Plan serve low-income individuals. The HPRP funds must also be used to address the needs of low-income individuals.

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: _____)

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

   Response: The State will require units of general local government and private non-profit organizations (with the appropriate local unit of government's approval) to submit preliminary proposals. Information, specific to the target area, about homeless persons and persons at risk of becoming homeless should be included in the proposals. Local units of government may apply in partnership with other local units of government to expand the service area and increase services to be provided to beneficiaries. Risk factors include, but are not limited to, eviction within two weeks from a private dwelling, sudden and significant loss of income, severe housing cost burden (greater than 50 percent of income for housing costs) and extremely low income (less than 30 percent of Area Median Income).

Proposals should provide the applicants' strategies to prevent homelessness and rapidly re-house homeless persons. Project reviews will include the following criteria:

- demonstrated need for assistance in the service area
- plan to provide services to the target population
- capacity to carry out program requirements
- activities to be performed
- collaboration with local agencies serving similar target populations

Upon completion of reviews of preliminary proposals, the State may request select nonprofits and communities to submit additional information.

State subgrantees will be required to ensure that program information is available in the appropriate languages for the geographic area(s) to be served with HPRP funds.

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 State will invite proposals from eligible jurisdictions and non-profit organizations. The State will review the proposals for documented need in relation to compliance with the requirements of the Homelessness Prevention and

Rapid Re-Housing Program under the American Recovery and Reinvestment Act of 2009. Applicants whose activities meet the statutory requirements and who have developed plans to prevent homelessness and rapidly re-house homeless persons will be evaluated based on the following criteria:

- activity must have significant impact towards homelessness prevention or rapid re-housing of homeless persons
- applicant should demonstrate capacity (as a result of in-house experience or partnerships) to successfully carry-out the project
- cost-effective activities to re-house homeless persons into stable and sustainable housing
- enrollment of program participants in applicable mainstream resources

Out of the total $13,328,942 in HPRP funds allocated to the State of Alabama, the State will make available $12,662,495 (95 percent) for grant awards. The remaining $666,447 (5 percent) will be shared by the State and its subgrantees for program administration. The State has chosen not to set a particular grant ceiling because the applicant service area will vary by population. However, service area population will be considered during the award process. Depending on the number of acceptable proposals received, the State will retain full option to adjust grant size, fund a portion(s) of a project or modify project activities. If a sufficient number of acceptable proposals is not received, the State will retain the option to utilize other means of distribution.

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: All HPRP activities will be carried out by subgrantees. Therefore, the State's expenditure rate will be dependent on the expenditure rates of its subgrantees. On behalf of the State, ADECA will perform a periodic desk review of each subgrantee to monitor their expenditure rates and the eligibility of activities. If, during the course of implementation, disallowed costs are discovered or a subgrantee does not have satisfactory obligation or expenditure rates, the State may exercise the option to reward high performers receiving HPRP grants with additional funds.

ADECA will perform at least one on-site monitoring review of all HPRP subgrantees to observe activities being carried out. The monitoring review will be scheduled at the time at least 30 percent of the funds have been drawn. The ADECA staff will oversee all activities and expenditure of funds to ensure full accountability. Areas to be reviewed for compliance will include financial management, civil rights, eligibility, timeliness, reporting and housing as appropriate.

After each monitoring visit, a report will be written to the subgrantee to explain the results of the review. Monitoring determinations will range from "acceptable" to "finding" with appropriate corrective measures imposed. Corrective measures may

include certifications that inadequacies will be resolved, documentary evidence that corrective actions have been instituted, reimbursement of disallowed costs, or other sanctions. HPRP grants will not be closed if findings are unresolved.

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: ADECA will provide 95 percent of its HPRP allocation to subgrantees. Therefore, the provision of HPRP services to homeless persons or persons at risk of becoming homeless will be carried out by subgrantees. The requirement of collaborating with other agencies receiving funds under the American Recovery and Reinvestment Act of 2009 will be passed down to the subgrantees. To avoid duplication of services, each subgrantee will be required to coordinate with other agencies to determine which services will be provided by those agencies.

   Provision of necessary services to the homeless and those at risk of becoming homeless requires comprehensive coordinated efforts of all agencies involved. To ensure that needs not addressed in the HPRP are met, each subgrantee will be required to collaborate with other agencies such as the Department of Education to meet educational needs; the Department of Health and Human Services to meet nutritional, health or emergency needs; the Department of Homeland Security for provision of food and transportation; and the Department of Labor for employment skills and training.

Each subgrantee will be encouraged to develop Memoranda of Understanding with local agencies. Each subgrantee must submit a list of the agencies with which they have such agreements. Subgrantees will be required to demonstrate how their partnerships with other social service agencies will assure the effective delivery of services to program participants.

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: The Continuum of Care system is designed to provide a complete response to the different needs of homeless persons and families. Since the provision of services will be carried out at the subgrantee level, each subgrantee will be responsible for coordinating with the local Continuum(s) of Care to ensure that HPRP activities are supportive of the local continuum's strategies for preventing and ending homelessness. The subgrantee must demonstrate the following:

   - understanding of the basic concept of a continuum of care
   - knowledge of existing members of the local continuum(s)
   - knowledge of the services provided by the members of the local continuum(s)
   - a plan that provides for unduplicated services
   - knowledge of the strategies and goals of the continuum(s)

- a plan to provide services in support of the strategies and goals of the local continuum(s)

The subgrantee will also be responsible for collaborating with those agencies providing mainstream resources. The State has an established 2-1-1 system that links callers with health and human services for daily needs or times of crisis. The 2-1-1 system offers access to the following types of services:

- basic human needs
- physical and mental health
- employment support
- support for older Americans and persons with disabilities
- support for children, youth and families

Subgrantees will be encouraged to utilize the 2-1-1 system in their service delivery to program participants. Whenever necessary, the subgrantee may utilize the 2-1-1 system to refer persons ineligible for HPRP assistance to the appropriate service provider.

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: HPRP grant funds will be used to assist households at or below 50 percent of the Area Median Income. Through the Community Development Block Grant Program (CDBG), the Emergency Shelter Grant Program (ESG), the

Housing Opportunities for Persons With AIDS Program (HOPWA), and the Home Investment Partnerships Program (HOME), the Consolidated Plan addresses the needs of low- to moderate-income persons within the State. Areas addressed include community and economic development, affordable housing, assistance to homeless persons and victims of domestic violence and provision of housing and supportive services to persons with HIV/AIDS.

HPRP and the Emergency Shelter Grant Program (ESG) each list homelessness prevention as an eligible activity. HPRP grant funds will provide short- or medium-term financial assistance to program participants who might otherwise benefit from similar assistance through the ESG Program. Both HPRP and ESG funds will allow eligible participants to remain in their homes and help decrease the incidence of homelessness in the State.

HOPWA funds are used to prevent homelessness of persons living with HIV/AIDS. HPRP funds may be used to provide financial assistance to prevent persons with HIV/AIDS or other chronic health issues and physical disabilities from becoming homeless.

An objective of the HOME and CDBG Programs is to meet the affordable housing needs of low- and moderate-income Alabamians. The rapid re-housing activity of the HPRP supports this objective. The HPRP rapid re-housing activity may be used to place program participants into affordable, sustainable and stable housing units.

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]	$5,398,222	$3,598,814	$8,997,036
Housing Relocation and Stabilization Services[2]	$1,799,407	$1,199,605	$2,999,012
Subtotal (add previous two rows)	**$7,197,629**	**$4,798,419**	**$11,996,048**

Data Collection and Evaluation[3]	$ 666,447
Administration (up to 5% of allocation)	$ 666,447
Total HPRP Amount Budgeted[4]	**$13,328,942**

[1]Financial 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.

[2]Housing 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.

[3]Data 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.

[4]This amount must match the amount entered in the cell on the table in Section A titled "Amount Grantee is Requesting."

The State understands that the above estimates will be revised to reflect actual numbers based on approved projects without entailing a formal amendment.

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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

5/13/09
Date

Sgt. Director
Title