

Substantial Amendment to the Consolidated Plan 2008 Annual 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 Annual 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.

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 Vermont
Name of Entity or Department Administering Funds	Agency of Human Services (AHS)
HPRP Contact Person (person to answer questions about this amendment and HPRP)	Cathleen M. Voyer
Title	AHS Housing, Transportation and Legislative Affairs Director
Address Line 1	Office of the Secretary
Address Line 2	103 South Main Street
City, State, Zip Code	Waterbury, VT 05671-0204
Telephone	802-241-4624 or 802-498-4391
Fax	802-241-2979
Email Address	cathy.voyer@ahs.state.vt.us
Authorized Official (if different from Contact Person)	Patrick Flood
Title	Deputy Secretary
Address Line 1	103 South Main Street
Address Line 2	
City, State, Zip Code	Waterbury, VT 05671-0204
Telephone	(802) 241-2220
Fax	(802) 241-2979
Email Address	patrick.flood@ahs.state.vt.us
Web Address where this Form is Posted	helpingtohouse.org dhca.state.vt.us/housing

Amount Grantee is Eligible to Receive*	\$ 3,398,824
Amount Grantee is Requesting	\$ 3,398,824

*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:

According to the approved State of Vermont citizen Participation Plan adopted on April 25, 2005, Vermont has met the citizen participation plan. The Agency of Human Services (AHS) has actively engaged the Vermont Balance of State Continuum of Care, the Chittenden County Continuum of Care, housing and human service providers, homeless providers and state officials across the spectrum through the Vermont Interagency Council on Homelessness (VICH). The VICH has taken the lead in reviewing, developing and reaching out to the community providers. In addition, AHS has actively engaged the council in developing a distribution plan for funding through sub-committees making recommendations to the full council and participants.

The VICH and those invited to participate have reviewed all documents developed. The invitee list consists of more than ninety individuals and organizations. In addition, numerous invitees forwarded the information to their organization membership; resulting in a very extensive citizen participation process.

The Vermont Department of Housing and Community Affairs published notice of the "*Substantial Amendment to the Consolidated Plan*" (this form) for comment in newspapers throughout Vermont, and asked for input over a minimum twelve-day period as allowed. This form was posted on line at the Department's website (www.dhca.state.vt.us/housing) and the website of the VICH and Coalition to End Homelessness (www.helpingtohouse.org) and distributed at the April 23, 2009 VICH meeting. Comments from the public were solicited and received through traditional mail, email, and VICH meetings.

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.

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Response: **Need to wait for public comments....**

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 sub-grantees. 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 Agency of Human Services (AHS) developed and distributed a draft Request for Proposals widely through the Vermont Interagency Council on Homelessness for public comment and suggestions. The submitted RFP will be scored using a points system, with points awarded for demonstrated capacity to serve the targeted population, demonstrated degree of partnership and integration, leveraging capacity, and the ability to meet requirements of AHS and HUD.

Sub-grantees will have a proven record of accomplishment of working with persons who are homeless or at risk of homelessness and will have an existing infrastructure to expand or build upon the additional funding. Successful sub-grantees must demonstrate they are able to effectively partner with other community agencies including emergency shelters and housing providers, and they have a local program planning process utilizing the local Continuum of Care and the AHS Field Services Directors. Sub-grantees will demonstrate the ability to:

- leverage additional resources to maximize HPRP funding including other American Recovery and Reinvestment Funding and State resources,
- implement a state required system for prioritizing those persons “most in need”
- implement a State-approved intake and assessment process through the implementation of a Homelessness Management Information System approved by HUD and AHS to track persons served and services provided.

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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 sub-grantees by September 30, 2009, as required by the HPRP Notice (limit 250 words).

Response:

The AHS and the VICH have done a considerable amount of pre-planning and AHS is ready to move forward by September 30, 2009.

The Agency of Human Services and the VICH will utilize the RFP to determine who will receive the funding within the district. AHS hopes to issue the RFP in early July and select grantees in mid-August. Grants will be awarded in August so that grantees will be ready for full implementation by September 30, 2009.

Distribution of the funding will be based on past documented data from existing homeless programs within each AHS district. AHS will reserve 10% of the HPRP funding for unforeseen circumstances each year. If the funds are not needed to address unforeseen circumstances throughout the contract period, AHS will re-distribute the remaining funding in the last quarter of the contract period. Every six months, AHS, with input from the VICH, will review the HMIS data collected to determine if there is a need to recalculate funding allocations.

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 sub-grantees (limit 500 words).

Response:

The AHS will use a combination of data reporting and direct technical assistance to assure that HPRP funds are spent appropriately on eligible activities. In addition, AHS will maintain separate accounting for state funds and HPRP funding. Funding to the sub-grantee will be distributed on a quarterly basis. Data will be required monthly from sub-grantees. If data is not submitted in a timely manner, or if service problems arise, funding will not be distributed for the following quarter until the problems are addressed. AHS will enhance existing technical assistance for HMIS administration and report management.

While requiring and ensuring data collection is critical, it will not be the only measure. Locally, the Agency of Human Services will require the participation of the AHS Field Services Directors. Field Services Directors have overall responsibility for ensuring the optimal functioning of all AHS programs and grants in designated regions, and the HPRP program will be a priority for them. Each Field Services Director will be required to manage the grant in their region and

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evaluate outcomes. This will require on-going communication and coordination with the grantee and the local Continuum of Care.

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:

The Vermont Interagency Council on Homelessness has been the lead entity in developing a plan and distributing HPRP funds. The VICH consist of members from the VT Department of Education (DOE), Vermont Department of Labor, The Agency of Human Services' multiple divisions and departments, and the Veterans Administration as well as other statewide housing and service agencies. Bidders are required to demonstrate the "degree of partnership and integration with other community agencies" and bids will be scored on the ability to demonstrate how well they are collaborating.

The AHS is committed to ensuring the maximization of all resources. Leveraging local, state and federal resources will be a scoring criteria when the review panel reviews the applications submitted. AHS Field Services Directors will play a key role in development of the local application for the funding. There is a requirement within the RFP that all organizations that will actively participate in the HPRP program sign off on the RFP application.

The DOE has worked closely with the AHS to identify and coordinate services to families experiencing homelessness. DOE coordinates service protocols for homeless students and their families with the AHS district offices, so identified homeless families are enrollment in school and referrals for appropriate housing and services are provided. The state coordinator for Homeless Education serves as a member of the VICH. The DOE supports the participation of homeless education liaisons in local and regional planning efforts as well as working relationships with shelters and youth programs statewide.

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 goal of this program is to prevent or resolve homelessness for as many homeless or at-risk Vermonters as possible through an integrated approach,

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working collaboratively with all interested community partners, and using a comprehensive local plan. The RFP contains a requirement to develop “a local program planning process developed in partnership with the local Continuum of Care and AHS Field Services Director”. AHS has historically worked closely with the local Continuums of Care and the Balance of State Continuum of Care. The RFP also includes a section, which states, “The response must include a letter signed by the chair of the local Continuum of Care (CoC) stating that the bidder met with the CoC and discussed its proposal and received feedback from the CoC members. The proposal must also include letters from any other community partner agencies who have agreed to work in partnership with the bidder on this program, stating what the partner agency has agreed to provide for integration of funding or other resources.” With this requirement, there will be a need to show strong partnerships within the community, or the application will not be funded.

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:

This plan is consistent with Vermont’s HUD Consolidated Plan Action Plan for 2008. The goals of the Agency of Human Services to address homelessness, as articulated in the Consolidated Plan are to develop an agency wide integrated approach to homelessness prevention, identify both financial and human resources to lead efforts within our communities, and assist in locating housing for those who are homeless. The HousingNow initiative provides an integrated, holistic approach to providing services to maintain or place families in housing. AHS already takes a collaborative, community based approach integrated and led by Field Services Directors in each District. This plan strengthens and continues cooperation with all partners, such as the VICH and all Department of AHS in the same direction.

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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	\$ 784,706	\$ 784,706	\$ 1,569,412
Housing Relocation and Stabilization Services ²	\$ 784,706	\$ 784,706	\$ 1,569,412
Subtotal (add previous two rows)	\$ 1,569,412	\$ 1,569,412	\$ 3,138,824
Data Collection and Evaluation ³			\$ 100,000
Administration (up to 5% of allocation)			\$ 160,000
Total HPRP Amount Budgeted⁴			\$3,398,824

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, and moving cost assistance.

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 table near the end of 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

DRAFT