CITY OF BOSTON

Substantial Amendment to the Consolidated Plan 2008 Action Plan for the Homelessness Prevention and Rapid Re-Housing Program (HPRP)

City of Boston
Thomas M. Menino, Mayor

Department of Neighborhood Development
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DEPARTMENT OF NEIGHBORHOOD DEVELOPMENT
26 Court Street, Boston, MA 02108

Draft Substantial Amendment to the City of Boston's Consolidated Plan 2008 Action Plan for the Homelessness Prevention and Rapid Re-Housing Program (HPRP)

TABLE OF CONTENTS

Section	
A	General Information
B	Citizen Participation and Public Comment
C	Distribution and Administration of Funds
D	Collaboration
E	Estimated Budget Summary
F	Authorized Signature
G	General Consolidated Plan and HPRP Certifications
H	SF-424

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A. General Information

Grantee Name	City of Boston
Name of Entity or Department Administering Funds	Department of Neighborhood Development
HPRP Contact Person (person to answer questions about this amendment and HPRP)	Bob Gehret
Title	Deputy Director
Address Line 1	26 Court Street 8th floor
Address Line 2	
City, State, Zip Code	Boston, MA 02018
Telephone	617.635.0242
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Authorized Official (if different from Contact Person)	Evelyn Friedman
Title	Director, Department of Neighborhood Development
Address Line 1	26 Court Street
Address Line 2	
City, State, Zip Code	Boston, MA 02108
Telephone	617.635.4352
Fax	
Email Address	efriedman.dnd@cityofboston.gov
Web Address where this Form is Posted	http://cityofboston.gov/dnd/Consolidated_Plan.asp

Amount Grantee is Eligible to Receive*	**$ 8,209,151**
Amount Grantee is Requesting	**$ 8,209,151**

*Amounts are available at http://www.hud.gov/recovery/homelesspreventrecov.xls

Draft Substantial Amendment to the City of Boston's Consolidated Plan 2008 Action Plan for the Homelessness Prevention and Rapid Re-Housing Program (HPRP)

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:

   In accordance with the City of Boston's citizen participation plan, the following steps were taken regarding the proposed HPRP substantial amendment:

   - The draft HPRP Substantial Amendment was posted on the City of Boston's website for a 12-day public comment period beginning on 5/1/2009 and ending on 5/13/2009.
   - A notice announcing the availability and soliciting comments on the draft HPRP Substantial Amendment was published in the Boston Herald on 5/1/2009 and was mailed to over 450 individuals and organizations on a mailing list the City maintains for its official citizen participation process.
   - The City of Boston's structure for planning and program development regarding issues of homelessness and homelessness prevention is called the City of Boston Regional Network (BRN). The BRN consists of the Leadership Council; which is primarily responsible for developing and implementing Boston's plan to end homelessness; the City of Boston Interagency Council on Housing and Homelessness (CoB ICHH), and six Working Groups that provide recommendations for the plan to end Homelessness to the Leadership Council.
   - Recommendations for HPRP funding were discussed at meetings of the Leadership Council on 4/29 and 5/15, at meetings of the CoB ICHH on 4/6 and 5/4 and at a number of the Working Groups meetings that took place during April 2009.
   - DND also developed and distributed a survey to key stakeholders in the housing and homelessness community, including housing developers and property managers, providers of emergency shelter and transitional housing programs, providers of workforce services and community development corporations.

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:

The City would like to thank the following individuals and organizations for their comments on the draft Substantial Amendment for the Homelessness Prevention and Rapid Re-Housing Program (HPRP).

- Kathy Brown, Coordinator, Boston Tenant Coalition, Boston MA
- Lyndia Downie, President and Executive Director, Pine Street Inn, Boston, MA
- Joe Finn, President & Executive Director, Massachusetts Housing and Shelter Alliance, Boston, Massachusetts
- Robyn Frost, Executive Director, Massachusetts Coalition for the Homeless, Lynn, MA
- Ruth Harel Garvey, Program Director, Boston Tenancy Preservation Program,
- Jim Goldberg, Eldercare Alliance, Boston, MA
- Larry Gottlieb, Director of Homeless Services, Eliot Community Human Services, Lexington, MA
- Dale Mitchell, Executive Director, Ethos, Jamaica Plain, MA
- Mary Nee, Executive Director, hopeFound (formerly Friends of the Shattuck Shelter), Boston, MA.
- New England Shelter for Homeless Veterans
- Robert Sable, Executive Director, Greater Boston Legal Services, Boston, MA
- Sandra Wixted, Director of Social Services, Travelers Aid Family Services, Boston, MA
- Renee Yourk, Associate Director of Foundation Relations, The Home for Little Wanderers, Boston, MA
- Robin Zarges, Bridge Over Troubled Waters, Boston, MA

A summary of the public comments received regarding the draft HPRP Substantial amendment is provided on the following pages. Comments are grouped by issue and similar comments may have been combined or paraphrased.

Draft Substantial Amendment to the City of Boston's Consolidated Plan 2008 Action Plan for the Homelessness Prevention and Rapid Re-Housing Program (HPRP)

Issue: Allocation of Funds Between Prevention and Rapid Re-Housing (City proposed 80% for Prevention and 20% for Rapid Re-Housing)	
One organization urged the City to change the distribution to a 50/50 split overall but that it should be 60% prevention/40% rapid re-housing for homeless families and 40% prevention/60% rapid re-housing for homeless individuals.	The City is planning to go forward with the proposed allocation for the Request for Proposals. There are substantial amounts of other resources available for rapid re-housing and only very limited resources for homelessness prevention. The proposed HPRP budget allocates approximately $6.5 million (80%) of the available funds for homelessness prevention and $1 million (12%) for Rapid Re-housing programs. The City of Boston took into consideration two major factors in making this funding allocation decision. First, the City of Boston has already received two funding awards targeted to Rapid Re-housing Programs. One award was through the 2008 Continuum of Care Homeless Assistance application. The award is for $1,940,356 and will serve 98 households. The second award is for $750,000 from the Commonwealth Interagency Council on Housing and Homelessness Pilot Initiatives and will serve 55 households. Second, the Commonwealth of Massachusetts is proposing to allocate $13,010,000 of their HPRP allocation to Rapid Re-housing Programs. Based on data collected by the Commonwealth, approximately 40% of the Commonwealth's homeless population is Boston households and will be served by this allocation. This allocation may change based on the responses to the RFP.
An emergency and transitional shelter provider urged that the greatest percentage of funds should be used for rapid re-housing of people in emergency shelter and transitional shelter programs.	
A third organization supported the City's proposal to use 80% for homelessness prevention .	
A fourth organization did not recommend a particular funding split, but urged the City to prioritize prevention of evictions. This organization also recommended that funds used for Rapid Re-Housing should focus on families that are not eligible for state Emergency Assistance and shallow/temporary subsidies should be provided for up to 18 months (medium term)	
One organization strongly disagreed with the City's proposed prioritization of resources to homeless prevention and argued for allocating a minimum of 40% of the resources for rapid-reentry for Tier 1 and Tier 2 homeless individuals.	
Issue: Allocation of Funds between Financial Assistance and Stabilization services (City proposed 50% for Financial Assistance and 50% for Stabilization Services)	
Stabilization services should be 40% for each category (Prevention and Rapid Re-Housing).	The City plans to issue the RPF based on the 60/40 allocation between Financial Assistance and Stabilization. This may be adjusted based on responses to the RFP and program performance.
Another organization supports the City's emphasis on stabilization services	

Draft Substantial Amendment to the City of Boston's Consolidated Plan 2008 Action Plan for the Homelessness Prevention and Rapid Re-Housing Program (HPRP)

Issue: Income Targeting – the HRPR program requires that all households be homeless and have incomes below 50% of the Area Median Income.	
One organization urged the City to prioritize HPRP funds for households with incomes under 30% of AMI	We agree in principle, but urgency of a particular situation (impending eviction, etc.) may override income concerns.
Issue: Program Design	
Provide services at service locations already used by homeless and at-risk households, esp. Dept. Of Transitional Assistance offices.	Most of the program design issues will be addressed as we develop the RFP. We cannot guarantee that we will be able to sustain many of these initiatives after the HPRP funding expires. It is a large amount of money and there is no guarantee that it will be funded in the future. We will need to use the resource as effectively as possible while it is available. Successful outcomes may create support for renewal funding at the federal level for the HPRP program.
Avoid creating of funding/assistance cliffs. Need to plan ahead to maintain assistance after HPRP assistance ends.	
City should not spend prevention dollars on service positions that cannot be maintained after this one-time funding runs out.	
A Legal Services organization urged the City to allocate funds for eviction defense and outreach to tenants	
The City should fund legal advocacy to help at-risk households obtain and keep welfare, disability and other cash assistance benefits.	
Issue: Service Delivery Vehicle for Homelessness Prevention (existing network of providers vs. more centralized system)	
One organization recommended that the City should use the current prevention infrastructure to deliver prevention services, but that a coordinating entity should be designated to enhance partnerships, strengthen the continuum of prevention services, identify best practices and quickly address emerging needs.	The short amount of time allowed for utilizing these funds will require that the City rely on existing prevention infrastructure and that that infrastructure be streamlined to enhanced to become much more efficient and effective.
Definitions	
Define household as individuals and families	HPRP uses the term "program participant" rather than household which can be an individual or family, with or without children.

Draft Substantial Amendment to the City of Boston's Consolidated Plan 2008 Action Plan for the Homelessness Prevention and Rapid Re-Housing Program (HPRP)

Issue: Homeless Subpopulations	
Each category of funds should target a specific sub-population. Prevention funds should be prioritized to chronically homeless individuals. Rapid Re-housing funds should be prioritized to short-term and medium term shelter dwellers.	We do not plan to establish any set-asides of funds for specific subpopulations. Given the recent large increase in the numbers of families becoming homeless, the City plans to give priority in its RPF for homelessness prevention and rapid re-housing services for homeless families. Given the limited resources, our goal will be to do a few things well rather than spreading the money as widely as possible. We will be monitoring program accomplishments closely to see which approaches are the most successful for specific subpopulations. Resource allocations will be adjusted based on performance.
Boston should allocate an appropriate amount of both homelessness prevention and rapid re-housing resources for runaway and at-risk youth.	
A specific percentage of funds should be allocated to homeless prevention and rapid re-housing of young people between the ages of 18-24.	
Boston should prioritize providing prevention resources to tenants and homeowners who are risk of homelessness through foreclosure and should include these priorities in the RFP.	
Two organizations stated that homeless veterans are a priority and funds should be allocated in proportion to their prevalence in the homeless and at-risk populations.	
The City should use resources strategically to assist households with barriers to stable tenancies (CORI issues, credit issues, poor tenant issues, etc). Establish a successful track record for "undesirable" tenants.	
One organization recommended that HPRP funds be used to provide staffing for existing prevention programs serving the at-risk disabled and impaired population (households in subsidized housing that do not pay their rent)	

Draft Substantial Amendment to the City of Boston's Consolidated Plan 2008 Action Plan for the Homelessness Prevention and Rapid Re-Housing Program (HPRP)

Issue: Specific Organizational Funding Requests	
An organization providing mental health services to the homeless whose State Dept. of Mental Health funding is ending urged the City to provide HPRP funding to enable the program to continue.	Organizations will have to apply for funding for requested services through RPF process. We do not plan to fund any external organizations (non City agencies) outside the RFP process.
Two elder services programs suggested that by providing funding for a half-time staff person 50 clients in a money management program or on the waiting list and are in danger of falling behind on rent or mortgage payments could be served.	
Issue: Data Quality and Program Evaluation	
City should promote high quality data integration and analysis by funding provider staff positions dedicated to data entry and/or analysis	We do not anticipate providing funding specifically for provider staff positions dedicated exclusively to data entry and analysis. However, providers may use their share of HPRP administrative funds or any HPRP Data Collection and Evaluation funds they may be awarded for these costs.

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:

   To select subgrantees, The Department of Neighborhood Development will issue a Request for Proposals (RFP) to qualified agencies that have experience providing HPRP services to homeless and at-risk households. An RFP process will ensure that responses will be evaluated fairly according to the selection criteria stated in the RFP. In addition, DND will hold a bidders conference where potential respondents will have the opportunity to ask questions they may have regarding the RFP.

   The RFP will list the types of services that DND seeks to provide with HPRP funds and will provide guidance on the service delivery system where those services will be provided. DND will consider the comments received during the citizen participation process as described in Section B when selecting the types of services to be provided.

   The Selection Committee will evaluate each response that meets minimum evaluation criteria. An evaluation instrument will be developed based on the criteria stated in the RFP and each proposal will be evaluated based on that criteria. Recommendations of subgrantees will be made to the Director of DND. Those recommendations will be presented to the Boston Regional Leadership Council for final approval.

   It is DND's intention to make the RFP available as soon as HUD approves the substantial amendment. Based on HUD's timeline the RFP would be available at the beginning of June with a thirty-day application period. The end of July or the beginning of August would make final decisions.

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:

   DND will obligate funds on or before September 30, 2009. Based on the timeline provided by HUD, Substantial Amendments will be approved no later that July 2, 2009 and in some cases sooner. Soon after the HUD approves the Substantial Amendment to the Consolidated Plan, DND will issue the RFP. DND will prepare the RFP during the month of June so it will be ready to be issued once the Substantial Amendment is approved. During May and June 2009, DND will work with the participants of the Boston Regional Network (the Leadership Council and Working Groups) to lay the groundwork for the development of a citywide service delivery system. This will enable existing mainstream service delivery systems such as community health centers, schools and churches and youth service providers to be able to refer households in need when the subgrantees are selected and funds become available.

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:

   The Department of Neighborhood Development will ensure the timeliness and effectiveness of HPRP beginning with the selection process where the RFP will clearly articulate the eligible activities, targeted populations, spending targets and the overall goals of the use of the HPRP funds. In addition, DND will use a three-part strategy to ensure the timeliness and effectiveness of these funds. The first will be the reporting requirements; the second will be the process by which the subgrantees draw down funds and the last will be through monitoring site-visits to subgrantees.

   DND has already begun to will develop common assessment and reporting tools that all recipients of HPRP will utilize to report on client and program outcomes. As required by HUD, DND will utilize its HMIS system to collect data on the HPRP participants and the outcomes achieved. The reporting tools will developed based on the prescribed HUD format and will include the required HUD data elements and other data elements that will be important in order develop a citywide homelessness prevention system. We intend to work with all subgrantees to share data elements with other subgrantees that will lead to de-duplication and improve efficiency and service delivery.

   DND will develop a payment system that will ensure that all program costs are eligible HPRP activities. DND and subgrantee staff will be trained on eligible activities and the payment requests will be reviewed for eligibility and consistency with the original

application. In addition, DND will develop a system whereby households in need receive the services they need in a timely manner. One of the qualifications of the subgrantees will include their experience and capacity to determine program eligibility in an efficient and timely manner.

Lastly, DND will conduct periodic monitoring site visits to subgrantees that will be modeled on the site visits conducted for the Supportive Housing, HOPWA and ESG programs. We will develop a monitoring tool that will include all elements of program eligibility, program quality, timely expenditure and most importantly program outcomes. DND will conduct site visits, write up monitoring reports and make recommendations for program improvement. If a subgrantee is not performing satisfactorily, we will eliminate or reduce funding and select another subgrantee to provide those services.

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 Department of Neighborhood Development administers the City's McKinney-Vento Continuum of Care Programs and will also be administering the HRPR program and other HUD ARRA (Stimulus) programs. As part of the Boston Regional Network, the City of Boston has created a City of Boston Interagency Council on Housing and Homelessness (ICHH). The Council has representatives from all City Departments that work on issues related to homelessness and homelessness prevention. Members include staff from the Boston Police Department, the Boston Public Health Commission, the Boston Public Schools and the Office of Jobs and Community Services. These and other City Departments are the recipients of ARRA funds received through other Federal and state agencies. Issues of coordination and collaborations on ARRA resources are discussed at the ICHH meetings. For example, we are currently reviewing ways to provide education and job training opportunities through funding from the Department of Labor to recipients of rapid re-housing funding in order to increase their income and move toward self-sufficiency.

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 grantee of HPRP funds is the City of Boston, the same entity as the Continuum of Care Lead Organization as identified in the 2008 McKinney-Vento Continuum of Care (CoC) Homeless Assistance application. Therefore, the process for coordination and collaboration of HPRP funds is similar to the planning process for the CoC application. The process is led by the City of Boston as the CoC lead organization and includes the Decision-Making Groups, the Committees, Subcommittees, Work Groups and as outlined in the Homeless Assistance application. Since the submission of the Homeless Assistance application last fall we have worked hard to broaden the scope of the outreach and collaboration to include more mainstream providers that provide housing and services to households at risk of homelessness. We have reached out to the housing development community (community development corporations, for and not for profit housing developers), the health care community; particularly the neighborhood health centers, the neighborhood schools and even the public libraries. We are poised to utilize the mainstream access points for households in need who may be at-risk for losing their housing.

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 Department of Neighborhood Development prepares the City of Boston's Consolidated Plan and annual Action Plans, the McKinney-Vento Continuum of Care Homeless Assistance applications, as well as the Substantial Amendment for the Homelessness Prevention and Rapid Re-Housing process. Homelessness Prevention and Rapid Re-housing were both identified and priorities in the City's FY2008 Continuum of Care Application which in incorporated into the City's Consolidated Plan and Fy2008 Action Plan. This HPRP Substantial Amendment is an amendment to the City's Approved Action Plan for FY2008 and will be incorporated into the City's Program Year 2009 and 2010 Action Plans.

Draft Substantial Amendment to the City of Boston's Consolidated Plan 2008 Action Plan for the Homelessness Prevention and Rapid Re-Housing Program (HPRP)

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]	$3,869,216	$ 600,000	$4,469,216
Housing Relocation and Stabilization Services[2]	$2,579,478	$ 400,000	$2,979,478
Subtotal (add previous two rows)	**$6,448,694**	**$1,000,000**	**$7,448,694**

Data Collection and Evaluation[3]	$ 350,000
Administration (up to 5% of allocation)	$ 410,457
Total HPRP Amount Budgeted[4]	**$ 8,209,151**

[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."