

Substantial Amendment to the 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 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 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 Nebraska
Name of Entity or Department Administering Funds	Nebraska Department of Health and Human Services
HPRP Contact Person (person to answer questions about this amendment and HPRP)	Charles W. Coley
Title	Program Specialist
Address Line 1	301 Centennial Mall South, 4 th Floor
Address Line 2	PO Box 5026
City, State, Zip Code	Lincoln, NE 68509-5026
Telephone	(402) 471-9200
Fax	(402) 471-9597
Email Address	charles.coley@nebraska.gov
Authorized Official (if different from Contact Person)	
Title	
Address Line 1	
Address Line 2	
City, State, Zip Code	
Telephone	
Fax	
Email Address	
Web Address where this Form is Posted	http://www.hhs.state.ne.us/fia/NHAP/NHAPindex.htm

Amount Grantee is Eligible to Receive*	\$5,128,578
Amount Grantee is Requesting	\$5,128,578

*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 of Nebraska has a citizen participation plan in place to ensure that citizens and other interested parties are given an opportunity for reasonable and timely access to information and records relating to the Consolidated Plan, Annual Action Plans, substantial amendments to these plans, and Annual Performance Reports. A formal twelve (12) day public comment period was opened May 1, 2009 through May 13, 2009 for the substantial amendment to the 2008 Annual Action Plan for the Homelessness Prevention and Rapid Re-housing Program under the American Recovery and Reinvestment Act of 2009. A news release announcing the public comment period was published on April 22, 2009 in the Lincoln Journal Star, a newspaper of general circulation. The news release included information that would allow for participation of all citizens, including non-English speaking persons and persons with disabilities.

A conference call for Continuum of Care service providers was held April 28, 2009 to discuss formula allocation of HPRP funds. Additionally, notice of the Public Comment Period was distributed electronically to the Nebraska Continuum of Care network statewide. The proposed substantial amendment was available on the Department of Health and Human Services website at: <http://www.hhs.state.ne.us/fia/NHAP/NHAPindex.htm> and on the Department of Economic Development's website at: <http://www.neded.org/content/view/183/63/>. Copies of the proposed substantial amendment were also made available to citizens upon request.

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:

C. Distribution and Administration of Funds

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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: Subgrantee selection for the Homelessness Prevention and Rapid Re-housing Program will be accomplished by a formula allocation to the seven statewide Continuum of Care regions based upon the percentage of funding that each region currently receives from the Nebraska Homeless Assistance Program (NHAP) of the Nebraska Department of Health and Human Services. DHHS NHAP funding combines Nebraska's Emergency Shelter Grant (ESG) allocation with the Homeless Shelter Assistance Trust Fund (HSATF). The annual DHHS NHAP formula ensures an equitable distribution of funds statewide and was developed with input from the State Continuum of Care Committee, which serves as advisory committee to NHAP. As detailed in the 2008 Action Plan, the DHHS NHAP formula allocates a base amount to all regions and then divides the remaining allocation to regions in consideration of population, poverty, and pro rata figures.

The State will mandate that one lead agency serve as subgrantee of HPRP funds within each of the seven Continuum of Care regions. This process will ensure a central point of intake for all HPRP-eligible program participants within each Continuum region. Four percent of HPRP funding will be obligated to the Nebraska Management Information System (NMIS), an incorporated entity, for the eligible activity of data collection and evaluation. NMIS currently implements HMIS within all seven Continuum of Care regions and therefore will also ensure HMIS data collection and evaluation for HPRP subgrantees.

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: Upon HUD's approval of the proposed substantial amendment to the 2008 Action Plan, DHHS NHAP will distribute an HPRP funding application to the

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seven Continuum of Care regions. The application will mandate that each Continuum select one lead agency to serve as HPRP subgrantee. A letter signed by the Continuum of Care chairperson certifying the selection of the lead agency as subgrantee will be a required attachment.

The application's submission deadline will be no later than August 1, 2009 in order to ensure that HPRP funds are obligated to subgrantees by September 30, 2009. This deadline will ensure timeliness for subgrantee award agreement formalization. A proposal will also be solicited from NMIS by August 1, 2009 to detail use of HPRP funding for data collection and evaluation. Award agreements will be formalized with all subgrantees no later than September 15, 2009. The final contract will be signed by the Director, Chair of the Board, and Financial Officer of each subgrantee agency.

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 application for request of subgrantee HPRP funds will specify that each subgrantee detail use of eligible activities, staff assigned to this project, assessment and intake of eligible program participants, and proposed program implementation. This will ensure the effective expenditure of funds for eligible activities. Additionally, the State will ensure that an HPRP subgrantee training is offered no later than December 31, 2009. The training will review eligible HPRP activities and will ensure that all subgrantees engage in fiscal practices to ensure the timely use of HPRP grant funds as outlined in the HPRP Notice. All subgrantees will be required to submit quarterly expenditure requests. These expenditure requests will be processed by DHHS NHAP personnel and will be monitored via IDIS. DHHS NHAP will oversee and monitor use of its own HPRP funds as well as subgrantee funds via monthly IDIS reports. This process will monitor the rate of expenditure for the State's administrative allowance and for all subgrantees. Moreover, quarterly conference calls will be required for all HPRP subgrantees and will be facilitated by DHHS NHAP personnel.

All HPRP subgrantees will be monitored to verify that expenditures are timely and solely for eligible activities. Specifically, DHHS NHAP personnel will be responsible for ensuring that HPRP subgrantees carry out eligible activities and comply with Federal regulations as detailed in the HPRP Notice. This requirement will be set forth in the agreement executed between the State and every subgrantee. The State will provide maximum feasible delegation of responsibility and authority to subgrantees as outlined in the Notice. Whenever possible, subgrantee deficiencies will be rectified through constructive discussion, negotiation, and assistance. Site monitoring will occur once annually for every HPRP subgrantee to ensure compliance with HPRP regulations as specified in the Notice. On-site subgrantee monitoring by DHHS NHAP personnel will be a structured review

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process to ensure both fiscal and programmatic compliance with HPRP regulations. A checklist will be utilized to verify that all specified issues have been addressed.

Off-site, or “desk” monitoring, will occur quarterly for all HPRP subgrantees. Desk monitoring will therefore be an ongoing process that will allow the State to identify any matters requiring immediate attention. The overall monitoring process will consider available evidence of HPRP program implementation, substantial progress toward program goals, compliance with Federal laws and regulations, and continued capacity to carry out the subgrantee program. In summary, the State will use the following processes and procedures for monitoring the administration and use of HPRP funds: annual subgrantee site monitoring, quarterly subgrantee desk monitoring, quarterly subgrantee conference calls, and continued contact and communication with subgrantees by NHAP personnel.

D. Collaboration

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: Preliminary communication regarding collaboration has occurred with other State agencies and departments that will receive funds, including the Nebraska Department of Education and within the Nebraska Department of Health and Human Services. This communication will ensure that interagency collaboration occurs and that program participant referrals are made to Continuum of Care subgrantees as appropriate. The State will mandate that HPRP subgrantees collaborate with non-HPRP funded local agencies that may have received funds from other Federal agencies. Subgrantees will be publicized via the NHAP website to encourage local agency referrals to the subgrantees as appropriate.

Additionally, the State will convene an HPRP Advisory Group consisting of the following State personnel: NHAP Program Specialist, DHHS HOPWA Coordinator, DHHS Domestic Violence personnel, DHHS Behavioral Health personnel, Department of Economic Development personnel, and Department of Corrections personnel. The Advisory Group will meet quarterly and will offer feedback regarding HPRP implementation. Finally, collaboration with agencies that can serve similar target populations will be ensured via the Nebraska Ad Hoc Committee on Ending Chronic Homelessness. The Ad Hoc Committee meets quarterly and serves as the Nebraska Interagency Council on Homelessness. Its membership consists of relevant State agencies and Continuum of Care personnel. Discussion of HPRP collaboration will be a featured agenda item during every Ad Hoc Committee meeting. These discussions will inform and guide the State’s HPRP implementation within each Continuum of Care region.

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1. Briefly describe how the grantee plans to collaborate with appropriate Continuum(s) of Care and mainstream resources regarding HPRP activities (limit 250 words).

Response: Because one lead agency per Continuum of Care region will serve as HPRP subgrantee, the State will consistently collaborate with the statewide Continuum of Care network. Additionally, the State Continuum of Care Committee serves in an advisory capacity to NHAP, and this will ensure sustained HPRP collaboration.

Regarding mainstream resources, all HPRP subgrantees will be directed to Nebraska TANF as appropriate to ensure the maximum utilization of both TANF and HPRP. Additionally, HPRP subgrantees will be directed to SOAR (SSI/SSDI Outreach, Access, and Recovery) trainings as appropriate. This will ensure that HPRP subgrantee case management staff are trained in the best practices of benefits acquisition for eligible program participants. Finally, mainstream resources are a featured objective of “Nebraska’s Plan to Address Homelessness” and will therefore be emphasized as a collaborative HPRP component.

2. 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: Objective I (a-b) of the Consolidated Plan’s Specific Homeless/Special Needs Objectives (Section 5-3) is as follows: Maintain efforts to prevent individuals and families from becoming homeless by providing assistance to households at imminent risk of becoming homeless by eviction for non-payment of rent or utilities; and working with local agencies to provide case management support that addresses the long-term, root causes of the near-homeless status and supports self-sufficiency. Because HPRP funds will serve people who are homeless or at imminent risk of becoming homeless via financial assistance and housing relocation/stabilization services, the funds will specifically support this objective of the Consolidated Plan. HPRP will therefore serve the broadest possible demographic of eligible program participants.

In support of Objective I detailed above, HPRP subgrantees will be strongly encouraged to utilize housing.ne.gov, a free online housing directory that lists affordable housing opportunities statewide. The service will allow consumers and case managers to locate available housing via the website or a toll-free number. Property owners will also be able to use this free service to advertise property listings. Additionally, HPRP subgrantees will also be encouraged to incorporate RentWise, a rental assistance curriculum that stresses the best practices of tenancy, for program participants. In summation, the following practices will ensure that grant funds are used in a manner that is consistent with Objective I as detailed above: providing HPRP assistance and services to all eligible program participants;

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case management utilization of housing.ne.gov; and utilization of RentWise trainings.

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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	\$2,286,833	\$980,071	\$3,266,904
Housing Relocation and Stabilization Services ²	\$980,071	\$420,031	\$1,400,102
Subtotal (add previous two rows)	\$3,266,904	\$1,400,102	\$4,667,006

Data Collection and Evaluation ³	\$205,143
Administration (up to 5% of allocation)	\$256,429
Total HPRP Amount Budgeted⁴	\$5,128,578

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

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