

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	City of New Orleans
Name of Entity or Department Administering Funds	Office of Recovery and Development Administration
HPRP Contact Person (person to answer questions about this amendment and HPRP)	Barry M. Walton
Title	Director, Planning & Resource Development
Address Line 1	1340 Poydras Street, 10 th Floor
Address Line 2	
City, State, Zip Code	New Orleans, LA 70112
Telephone	(504) 658-4348
Fax	(504) 658-4238
Email Address	bmwalton@cityofno.com
Authorized Official (if different from Contact Person)	C. Ray Nagin
Title	Mayor
Address Line 1	1300 Perdido Street, 2E10
Address Line 2	
City, State, Zip Code	New Orleans, LA 70112
Telephone	(504) 658-4900
Fax	(504) 658-4938
Email Address	ray.nagin@mayorofno.com
Web Address where this Form is Posted	www.cityofno.com

Amount Grantee is Eligible to Receive*	\$ 7,578,168
Amount Grantee is Requesting	\$ 7,578,168

*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 City of New Orleans met with agencies that have applied for Emergency Shelter Grant, Housing Opportunities for Persons with AIDS, and Housing Counseling funds with the City. The purpose of the meeting was to present an overview of the program, to receive input on what the emphasis of the program should be and the method of allocating funds.

Most of the comments at the meeting concerned UNITY's argument that they should administer the program and conduct an RFP for organizations who would seek funding. There was support for this view among quite a few of the agencies who are currently working with UNITY. A second viewpoint advocated that more than one entity should control the administrative portion of the HPRP Program. This view held that an entity more concerned about the fate of the program participants and not just about accumulating "numbers" for a program should be involved. If a participant participated in the program and housed today and was on the street tomorrow, what purpose does the program serve? The group formed a committee to work on a proposal.

The City posted the draft substantial amendment on the City's website and placed Public Notices in the newspaper summarizing the program and requesting feedback. A hard copy of the draft substantial amendment was available at the ORDA office and was e-mailed to anyone requesting a copy. There was a 12 day comment period for citizens to review and make comments on the draft report.

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 comments received reflected support for using UNITY of Grester New Orleans as the administrator of the funds. A representative of the New Orleans Leagal Assistance Corporation e-mailed that "Unity has already convened several planning sessions of members of our local continnum of care. There is

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consensus in the homeless service provider and homeless prevention community that having Unity administer the funds will be of greater impact and effectiveness for the following reasons:

- 1) Unity has experience with overseeing a large number of agencies that already participate in the continuum to serve varied special and low income populations
- 2) Unity will use an innovative approach in collaboration with existing mainstream resources and homeless prevention agencies to target assistance to those most in need
- 3) Unity envisions using funds for both rental assistance and case management assistance including legal services to prevent homelessness. As a provider of legal homeless prevention services under an ESG for about 15 years now, we know how critical this component is to families.
- 4) Unity has actively engaged agencies in using the HMIS system."

The Director of Homeless Services for Catholic Charities Archdiocese of New Orleans stated that "Since 1992, UNITY has been and continues to be the glue that holds many of the homeless service providers together. It has been truly visible during this Post Katrina era. UNITY is the information HUB for homeless service providers in Orleans and other parishes. It is the advocacy center for issues that affect the safety of the homeless and their multiple housing problems... Rapid Re-housing is not new to UNITY; in 2007 they coordinated the first Rapid Re-housing and Prevention program funded by DHHS. The success of the program rendered an extension of the contract to November, 2009. UNITY has the experience and understanding of how to operate a Rapid Re-housing /Prevention program. Therefore, for the sake of progress and the ability to move forward quickly we should not reinvent the wheel. We should not spend valuable time training individuals because what we have developed is already a successful program which is in place. Catholic Charities supports and requests that UNITY be considered for the coordination of the Stimulus ESG Rapid Re-housing funds."

Support also came from Odyssey House who noted that "Unity has already convened several planning sessions of members of our local continuum of care (and) there is consensus in the homeless service provider and homeless prevention community that ... Unity (should) administer the funds."

The Coalition of HIV/AIDS Nonprofits and Governmental Entities (CHANGE), a group of organizations including HOPWA grantees, HOPWA sponsor organizations, and other HIV-related organizations involved in the full continuum of care for those with HIV/AIDS, also presented their views at the meeting and after reviewing the draft document. CHANGE "support(s) the determination that UNITY of Greater New Orleans will be an efficient and effective administrator of

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the program. UNITY is a proven advocate for the needs of Persons Living with HIV/AIDS (PLWHA) and (CHANGE is) confident that their administration of the program will help to meet these needs. CHANGE encouraged the inclusion of low-income persons living with HIV/AIDS as a specific target population in need. That group is included in the HPRP program.

Another organization supporting UNITY as the administrator of the funds is VIA LINK which states "UNITY is already the Continuum of Care administrator for both Jefferson and Orleans Parishes. Thus, all of the funding, electronic and face-to-face communication links and relationships between UNITY and our community's homeless population and its service providers have already been long established. UNITY is quite simply the hands down leader in our community when it comes to working to end homelessness, appropriately administering housing/homeless service related funds of any type.

"As you know, clean and accurate reporting is key to any funding project . UNITY's Homeless Management Information System (HMIS) is tried, tested and true—and tremendous staff time goes into HMIS training, support and quality assurance reports every week of the year. A system as complex and challenging as HMIS takes years to implement and run appropriately and effectively. No other entity outside of UNITY is capable of providing the data and reporting piece that the HPPR project requires."

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 City determined that the most effective and efficient method to allocate these funds would be to have UNITY of Greater New Orleans administer the funds

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and conduct a Request for Proposal on the implementation of the program. UNITY is a collaborative of 60 agencies dedicated to coordinate partnerships to prevent, reduce, and end homelessness. Founded in 1992, UNITY has gained widespread trust and confidence within the Continuum of Care community and the New Orleans community at-large. UNITY has experience in administering homeless and rapid Re-Housing programs and allocating funds in those areas. They have extensive hands-on experience in reducing homelessness which was demonstrated most recently in finding shelter and housing for the hundreds who were in homeless camps in two separate locations in 2008.

The possibility of UNITY being the administrator of the HPRP program was discussed in detail at the above mentioned meeting with agencies involved in the continuum of care process. The group largely agreed to this concept but also urged that case management should be an integral component of the program to ensure that those program participants who were assisted would be able to maintain their status once the HPRP program concluded. The City's ORDA office will monitor the program through its Neighborhood Services and Facilities Office which monitors the City's ESG and HOPWA programs.

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: Once the grant agreement is signed, UNITY will facilitate a Request for Proposals process in which up to eleven non-profits will be selected to deliver program activities. Non-profits may apply for the following HPRP components:

1) One project sponsor to operate the central coordination and referral office (CCO) (4 positions including 2 outreach and 2 intake specialists- approximate 3-year grant award \$580,000)

2) Nine project sponsors to provide financial assistance and case management services to approximately 225 persons/families per project sponsor (1 case manager position per project sponsor – approximate 3-year grant award for case management per agency will be \$150,000 and approximate 3-year grant award for financial assistance per agency will be \$500,000)

3) One project sponsor to provide legal services to participants with legal issues affecting their housing status such as evictions, arrears, etc. (1 attorney – approximate 3-year grant award \$180,000)

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: UNITY will provide overall fiscal and programmatic oversight for the HPRP. This includes the following functions:

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- In collaboration with the City of New Orleans Office of Recovery and Development Administration, select eleven project sponsors based on agency capacity, experience and ability to provide quality services and financial assistance
- Monitor project sponsors through a grants management process to ensure that project sponsors are in compliance with fiscal and programmatic requirements and to enforce fraud prevention measures
- Develop a system of fiscal reimbursement so that project sponsors are reimbursed for their financial assistance and case management activities in a timely and efficient manner by working with the City to ensure that IDIS is used effectively and accurately to facilitate prompt payment to the subgrantees
- Provide technical assistance and training to project sponsors to ensure program effectiveness
- Monitor and evaluate performance measures for each project sponsor and HPRP as a whole
- Collaborate with organizations which can provide research that will help to identify potential participants such as targeting neighborhoods with high rates of poverty.
- Coordinate Homeless Management Information System activities for each project sponsor and coordinate with VIALink, the agency which provides for the overall coordination of ServicePoint, the local HMIS.

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: UNITY plans to collaborate with state departments and other entities which are receiving other Stimulus Funds in order to enhance the effectiveness of the HPRP such as the Department of Labor, the Department of Social Services (TANF, OCS), the Department of Education, and Housing Finance Authorities. See below for more details on how the HPRP program will utilize existing resources. From the initial point of entry, each participant will be assessed to determine the best and most appropriate assistance he or she should receive. Persons seeking assistance from the HPRP may enter the program in 2 ways:

1) Contact the Central Coordinating Office (CCO) directly through a phone referral or walk-in. The CCO will determine client eligibility and if person is determined to be eligible for HPRP, then they are assigned to one of the nine Financial Assistance/Case Management (FA/CM) sites for assistance.

2) Contact or visit one of the nine FA/CM sites or the legal services site. Then, the FA/CM or legal services site will conduct an intake assessment and submit documentation to the CCO for client eligibility determination and, if appropriate, a service provision request to provide services to client at that site.

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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: Because of its ongoing mission and by the very nature of this program design, UNITY will be collaborating within the Continuum of Care and mainstream resources, and with those mentioned in the above section who have received stimulus funds.

The Central Coordinating Office will consist of two intake staff and two outreach coordinators. The CCO will be in a location that is easily accessible to persons using RTA transportation and hopefully, in a building space donated by the City. CCO staff will perform the following functions:

- Screen and assess clients requesting assistance in order to determine eligibility, target for the appropriate services and length of financial assistance needed. A uniform assessment and intervention tool will be used by both the CCO and the FA/CM sites.
- Ensure that clients are being evaluated every three months to determine appropriate service intervention.
- Maintain unduplicated list of all clients assisted to ensure that there are no duplications in clients amongst project sponsors.
- Provide community outreach to enlist participants from various systems of care including: mental health clinics, hospitals, eviction court, municipal court, correctional system, foster care system, etc.
- Provide community outreach to enlist participants from various at-risk and/or homeless sub-populations including persons living with HIV/AIDS or other disabilities, persons living on the street or in abandoned buildings, persons living in homeless residential facilities, immigrants needing assistance (e.g., Hispanics, Vietnamese), etc.
- Linkage with UNITY Welcome Home HousingLink housing search and placement services in order to more readily locate affordable and appropriate housing in New Orleans for HPRP participants.

Financial Assistance/Case Management Sites

The FA/CM sites will provide the direct financial assistance and case management services of the HPRP. Each site will staff a full-time case manager to perform these duties:

- Conduct housing search/placement (if necessary)
- Conduct needs assessment and plan, with participant, necessary service goals and level of financial assistance to obtain housing stability and self-sufficiency
- Assist participants with financial and housing (tenant) management skills
- Assist participants with income and education development/enhancement

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- Link participant to other community and mainstream resources, including those that increase/improve employment and income.
 - Coordinate and provide for financial assistance payments to third party payees such as landlords, utility companies, etc.
 - Input participant data into Homeless Management Information System
 - Collaborate with UNITY office to process reimbursement and submit necessary reports and attend HPRP trainings and meetings.
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 City's Consolidated Plan (CP) notes that the continuum of care for New Orleans' homeless population consists of four basic components: emergency shelter, transitional housing, social service support and permanent housing.

To ensure that the continuum of care is adequate to meet the needs of the homeless population, the HPRP program continues the City's investment in the UNITY collaborative toward the creation of a seamless system of service for the homeless. Through Unity's ongoing collaborative process, housing and service providers will identify and close the gaps in the continuum of care in a manner that promotes continuous improvement and institutionalization of the system.

In the area of prevention, the CP advocates the assistance of extremely low- and low-income individuals and families who are at imminent risk of becoming homeless through the following strategies: rental/mortgage assistance, utility assistance, legal assistance, independent living skills, financial management services and payee services, information and referral programs, improvement of discharge planning policies and practices of hospitals, prisons, and other systems of care, and advocacy for increased availability of low-cost housing.

UNITY will coordinate a system of centralized intake/referral, outreach, financial assistance, case management, legal services and housing placement which will assist over 1574 individuals/families in New Orleans over a 3-year grant period. At least 1422 individuals/families at risk of homelessness will be prevented from becoming homeless and at least 152 individuals/families that are already experiencing homelessness will be rapidly re-housed through the efforts of the Homelessness Prevention and Rapid Re-housing Program (HPRP).

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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	\$ 3,554,161	\$ 1,523,212	\$ 5,077,373
Housing Relocation and Stabilization Services ²	\$ 1,326,179	\$ 568,363	\$ 1,894,542
Subtotal (add previous two rows)	\$ 4,880,340	\$ 2,091,575	\$ 6,971,915
Data Collection and Evaluation ³			\$ 227,345
Administration (up to 5% of allocation)			\$ 378,908
Total HPRP Amount Budgeted⁴			\$ 7,578,168

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

05/18/09

Date

Mayor

Title