

## **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](http://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)

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

**A. General Information**

<b>Grantee Name</b>	City of Omaha
<b>Name of Entity or Department Administering Funds</b>	Community Development Division City of Omaha Planning Department
<b>HPRP Contact Person</b> (person to answer questions about this amendment and HPRP)	David Thomas, Ph.D.
<b>Title</b>	Community Development Section Manager
<b>Address Line 1</b>	Omaha/Douglas Civic Center
<b>Address Line 2</b>	1819 Farnam Street, Suite 1100
<b>City, State, Zip Code</b>	Omaha, Nebraska, 68183-0110
<b>Telephone</b>	402-444-6829
<b>Fax</b>	402-444-6140
<b>Email Address</b>	David.Thomas@ci.omaha.ne.us
<b>Authorized Official</b> (if different from Contact Person)	Mike Fahey
<b>Title</b>	Mayor
<b>Address Line 1</b>	Omaha/Douglas Civic Center
<b>Address Line 2</b>	1819 Farnam Street, Suite 300
<b>City, State, Zip Code</b>	Omaha, Nebraska, 68183-0110
<b>Telephone</b>	402-444-5000
<b>Fax</b>	402-444-6059
<b>Email Address</b>	mfahey@ci.omaha.ne.us
<b>Web Address where this Form is Posted</b>	www.ci.omaha.ne.us

<b>Amount Grantee is Eligible to Receive*</b>	<b>\$2,017,099.00</b>
<b>Amount Grantee is Requesting</b>	<b>\$2,017,099.00</b>

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

## **Substantial Amendment to the 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:** Two separate notices published on the local CoC Listserve announced an initial meeting on HPRP (held April 6<sup>th</sup>). In addition, phone calls were made to representatives of specific agencies to ensure their participation, e.g., public housing authority, public power district, etc. At the meeting (there were sixty individuals in attendance representing numerous local agencies), a thorough explanation of HPRP was provided along with a timetable for 1) holding a Public Hearing, 2) submitting the Substantial Amendment to City Council and HUD, 3) issuing an RFP, 4) selecting sub-grantees, 5) finalizing sub-grantee agreements to ensure a program start date of October 1, 2009.

Notice of a Public Hearing -- to be held April 20<sup>th</sup> -- was published in the Omaha World Herald newspaper on April 10. The notice explained 1) the purpose of the public hearing, 2) that public comment in either oral or written form would be considered when preparing the Substantial Amendment and 3) that accommodations would be made for individuals needing an interpreter, Braille, large print or recorded materials.

On April 20<sup>th</sup>, the Public Hearing was held. At that meeting, HPRP regulations were reviewed after which the City presented its proposal for the use of HPRP funds. In addition, the City provided its plan 1) for the RFP process, 2) for the distribution and administration of funds and 3) for collaborating with partner agencies. Thirty individuals were in attendance representing 18 organizations. The public hearing was followed by a twelve day comment period.

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:** In addition to conducting a public hearing, the City of Omaha participated in two follow-up community meetings with members of the CoC and other interested parties. Other than questions seeking clarification on specific aspects of HPRP (i.e., *Can felons be served? What about aliens? Are phones*

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

*included in utilities?* – questions to which the City sought answers by turning to HUD), public comments concerned the following: 1) Given that the State of Nebraska has elected to provide HPRP funds to an agency selected by the CoC, then perhaps it makes sense for the City of Omaha to fund one of the principle functions of HPRP (Homelessness Prevention, for example) while the State of Nebraska funds the other principle function (Rapid Re-Housing); 2) At the same time, it was wondered whether or not some activities might be shared between the two functions, like habitability inspections or unit inventory development; 3) Interest also was expressed in having more than one sub-grantee for City HPRP funds, two or three sub-grantees, perhaps, so that prevention assistance could be initiated from multiple points in the community; 4) A “universal or common intake/assessment” process was considered desirable, a process consistently used across clients across agencies for determining eligibility for HPRP, in this way helping to ensure that referrals of likely participants can occur from multiple points in community (with the HPRP agency ultimately responsible for participant eligibility documentation); 5) HPRP case managers, it was suggested, should coordinate their efforts with other case managers in CoC so as to ensure that needed services are received throughout participant’s involvement with HPRP, i.e., case coordination across providers over time; 6) A related comment concerned the importance of making certain that the agency that receives HPRP funding be held accountable not only to the regulations governing HPRP but to the collaboration, responsiveness and professionalism that must characterize the culture of the CoC, i.e., that the agency in question should recognize that it is accountable not only to participants and grantee but to the other agencies with which it must work if the program is to be a success, that safeguards to this effect be put in place; 7) Concern was expressed over the implications that lead inspections – though necessary -- would have on the willingness of families and landlords to seek homelessness prevention assistance; 8) interest was expressed in reviewing the City’s RFP prior to its issuance in order to ensure that it represents and/or clarifies CoC concerns/values/aims/etc.; and finally, 9) the City was encouraged to consider carefully whether or not it should allocate HPRP funds to the City of Council Bluffs, Iowa given that Council Bluffs will be receiving HPRP funds through the State of Iowa.

The City accepted and considered all 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 sub-grantee is defined as the organization to which the grantee provides HPRP funds.

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

Competitive Process

Formula Allocation

Other (Specify: \_\_\_\_\_)

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

**Response:** On May 6<sup>th</sup>, the City of Omaha announced its HPRP Request for Proposals process. Applications, along with 1) application instructions, 2) summary of HPRP requirements and 3) web addresses for obtaining more detailed information on HPRP were made available at that time. In evaluating applications, the City will weigh heavily the agency's experience with the following: case management, outreach, credit assessment, credit repair, tenant-landlord negotiations, landlord inventories, the gathering and maintaining of available unit inventories, familiarity with Section 8 income eligibility processes, the application of the 'rent reasonableness' standard, experience with habitability inspections & city housing codes, rental assistance, utility assistance, program management, in general. In addition, applicants are expected to detail their plans for publicizing the program and coordinating with other resources and agencies in the community.

Applications will be due to the City by 4:00 p.m., June 8<sup>th</sup>. The City will score the applications and announce the selected sub-grantees by July 10<sup>th</sup>. At that point, the City will begin drafting the agreements with sub-grantees so that agreements are ready for City Council by early September (and thus, ready for approval as soon as the agreement between the City and HUD is finalized).

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:** As indicated in the response to the previous question, sub-grantees will be selected by July 10<sup>th</sup>. At that point, agreements will be drafted. Drafted agreements will contain the amount to be allocated to sub-grantees and will be reviewed by the City's Human Relations, Law and Finance Departments and also by sub-grantee officials. Finalized agreements will be signed by both parties (City and sub-grantee) and submitted to City Council for its approval during the month of September (for execution prior to September 30, 2009).

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).

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

**Response:** During the time that the sub-grantee agreements are being drafted (July and August, '09), the City will request that sub-grantees develop job descriptions and make organizational arrangements necessary to employ the staff needed to implement HPRP. The City will request that positions be advertised, applicants be interviewed, and candidates be selected with a start date of October 1, 2009. In this way, program implementation staff will be in place on the day the program begins.

In addition, through the networks with which the City and sub-grantees collaborate, the City will request the identification of participants likely to qualify for HPRP assistance. The City will request emergency shelters, transitional housing facilities, the Omaha Public Power District, the Omaha Housing Authority, WIA, churches, outreach workers, and others to construct referral lists of 1) likely HPRP participants, 2) possible landlords and 3) units available to HPRP participants. These referral lists will be forwarded to HPRP program staff on October 1, 2009. In this way, HPRP staff will have 1) participant lists, 2) landlords lists and 3) unit inventories available on the day the program begins.

The above steps will ensure the immediate expenditure of funds, both staff salaries and financial assistance to participants. Beginning October 1, the timely expenditure of funds is assured further by ongoing referrals from service providers now amplified by the efforts of HPRP staff charged with the task of outreach, case management, housing relocation, etc.

Additionally, the City will monitor the expenditure of funds – as well as the delivery of services – through a monthly report in which sub-grantees detail activities undertaken and amounts expended in each of the eligible activity areas, i.e., *case management* (# of initial assessments, # referred for financial assistance and for other services); *outreach/engagement* (specific outreach efforts), *housing search/placement* (units inventoried, # placed), *legal services* (tenant/landlord issues resolved, other housing issues resolved), *credit repair* (credit issues resolved), *rental assistance* (number receiving rental assistance and amount expended), *security/utility deposits* (number and kind of deposits and amount expended), *moving costs* (specific moving activities and costs), *motel/hotel vouchers* (number issued, amount expended), *data collection/evaluation* (cost of collecting, analyzing, reporting data) and finally, *administration* (cost of admin activities).

This monthly report, useful in the ongoing assessment of program performance, will serve as well to justify the advance of funds for the coming month's program costs (though other documentation may be required, as well). In this way, the rate of expenditure for each sub-grantee will be tracked. So, too, the rate of expenditure for City admin costs. Total expenditure figures for City and sub-grantee(s) will be added together for a month-by-month tracking of HPRP spending. Failure to expend at a rate sufficient to meet the two-year/60% expenditure goal will result in grantee/sub-grantee meetings (perhaps involving the entire CoC) for the purpose of implementing corrective action.

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

Finally, the City will conduct spot check habitability inspections using city code inspectors as well as on-site monitoring and review of sub-grantee performance to ensure compliance with the “effective and timely expenditure” standard.

### **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 City is in the process currently of contacting representatives of the NE Departments of Education, Health and Human Services, Homeland Security and Labor. In addition, it is contacting specific agencies, in some cases funded by these departments, to ensure their participation in the HPRP process. Workforce Development, for example, funded by the NE Department of Labor, administers the Adult & Dislocated Worker Program under WIA, providing training and counseling to individuals who have lost their job and may be in need of prevention or rapid re-housing assistance. Similarly, the YWCA, which works throughout the City with victims of domestic violence, is likely to be in contact with individuals and families in need of HPRP assistance.

With each of these departments/agencies, the City is distributing a document detailing the HPRP initiative as well as entering into a dialogue on how best to serve a shared clientele.

In addition, these groups -- once familiar with HPRP requirements -- will be asked to refer likely participants to HPRP so as ensure that their clients are assessed and served, if eligible. In addition, they will be asked to provide feedback (in the form of ratings and comments) on their satisfaction with the effectiveness of the HPRP initiative and this feedback will be used to keep collaboration and program performance on course.

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 State of Nebraska is awarding to an agency selected by the CoC a percentage of its HPRP allocation. That means that the State/CoC as well as the City will be bringing HPRP funds to our local HPRP initiative. City and CoC officials (and agencies) have been meeting in an effort to coordinate this initiative so that a single, integrated HPRP initiative is created and supported.

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

In addition, the City has distributed to CoC agencies a document summarizing HPRP regulations and, as well, has created and distributed schematics detailing how Homelessness Prevention and Rapid Re-Housing are to work (according to HUD's regulations). The purpose of these materials is to educate CoC agencies 1) so they can apply during the RFP process if they believe they can implement aspects of the program and 2) so that they can identify and refer likely participants.

The same educational/outreach effort is being undertaken with mainstream programs. Douglas County General Assistance has received the same material, as has Workforce Development. All mainstream resources are represented in the CoC and meet regularly.

All agencies with which the City and its sub-grantee(s) are to collaborate will be asked to create (and maintain) a referral list so clients can be assessed promptly when the program begins. They also will be asked on a regular basis to provide feedback to the City on their satisfaction with the effectiveness of the HPRP initiative. This feedback will be used to ensure accountability and promote ongoing collaboration.

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 2008-2012 Consolidated Plan Five Year Strategy has as one of its objectives the following: *Addressing the needs of homeless individuals and homeless families through a coordinated "continuum of care" effort committed to the prevention of homelessness, the treatment of homeless individuals with dignity and care, and the promotion of independent living.* HPRP is in line with this objective and compliments existing City programs. For example, the City allocates HOME funds for a tenant based rental assistance program serving individuals and families graduating from transitional housing. It uses its ESG allocation to fund operational expenses of the City's emergency shelters. In addition, it administers and supports a variety of housing programs designed to increase/improve its stock of affordable housing, i.e., homeowner and rental rehabilitation, new construction, new homebuyer financing, relocation. In support of these programs, the City funds training/counseling services providing renter/buyer education along with training in (or support for) home management, property care, budgeting, negotiation for loan reinstatement, foreclosure prevention, tenant/landlord negotiations. Finally, the City funds an emergency repair program designed to help low income individuals meet emergency needs that otherwise might require them to leave their homes. Bundled together, these programs serve not only the cause of affordable housing but homelessness prevention and rapid re-housing, as well. HPRP complements these initiatives and permits an emphasis and focus on concerns identified in both the Consolidated Plan and the community at large.

**Substantial Amendment to the 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.

<b>HPRP Estimated Budget Summary</b>			
	<b>Homelessness Prevention</b>	<b>Rapid Re-housing</b>	<b>Total Amount Budgeted</b>
Financial Assistance <sup>1</sup>	\$ 464,244.60	\$ 464,000.00	\$ 928,244.60
Housing Relocation and Stabilization Services <sup>2</sup>	\$ 464,000.00	\$ 464,000.00	\$ 928,000.00
<b>Subtotal</b> (add previous two rows)	<b>\$ 928,244.60</b>	<b>\$ 928,000.00</b>	<b>\$1,856,244.60</b>

Data Collection and Evaluation <sup>3</sup>	\$ 60,000.00
Administration (up to 5% of allocation)	\$ 100,854.40
<b>Total HPRP Amount Budgeted<sup>4</sup></b>	<b>\$2,017,099.00</b>

<sup>1</sup>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.

<sup>2</sup>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.

<sup>3</sup>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.

<sup>4</sup>This amount must match the amount entered in the cell on the table in Section A titled “Amount Grantee is Requesting.”

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

**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)

Mike Fahey  
Signature/Authorized Official

May 7, 2009  
Date

Mayor  
Title