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)

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

A. General Information

Grantee Name	Indiana Housing and Community Development Authority
Name of Entity or Department Administering Funds	Community Services Department
HPRP Contact Person (person to answer questions about this amendment and HPRP)	Rodney Stockment
Title	Community Services Manager
Address Line 1	30 South Meridian
Address Line 2	Suite 1000
City, State, Zip Code	Indianapolis, Indiana 46204
Telephone	317.233.1814
Fax	317.232.7778
Email Address	rstockment@ihcda.in.gov
Authorized Official (if different from Contact Person)	Sherry Seiwert
Title	Executive Director
Address Line 1	30 South Meridian
Address Line 2	Suite 1000
City, State, Zip Code	Indianapolis, Indiana 46204
Telephone	317.234.3873
Fax	317.232.7778
Email Address	sseiwert@ihcda.in.gov
Web Address where this Form is Posted	http://www.in.gov/ihcda/3120.htm

Amount Grantee is Eligible to Receive*	**$16,293,551.00**
Amount Grantee is Requesting	**$16,293,551.00**

*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: The Indiana Housing and Community Development Authority (IHCDA) developed the proposed substantial amendment through the state's Interagency Council on the Homeless and the sixteen Continua of Care. On April 9, 2009, IHCDA convened the Indiana HPRP Summit with CoC chairs and officials from local units of government receiving HPRP funds. After publishing an announcement of the amendment with local newspapers, the amendment was posted on the IHCDA website from May 1st through May 15th. The website provided citizens directions to submit comment via postal and e-mail. Citizens had the opportunity to comment on the proposed amendment through a public webinar meeting on May 6, 2009 and during the fifteen-day public comment period. In addition, IHCDA representatives consulted the sixteen Continua Care bodies about the proposed amendment and encouraged the Continua of Care to provide verbal and written feedback on the need for prevention and rapid rehousing. All comments received - both verbal and written – are appended to the amendment unless otherwise requested by the commenter.

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: To be added at the time of submission

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.

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

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: The grantee is using a Request for Qualification process to qualify sub-grantees selected by a local Continuum of Care network)

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

Response: The State of Indiana HPRP is utilizing the local Continuum of Care network to allocate HPRP funds. There are sixteen regional Continua of Care in Indiana. Allocation to the sixteen Continua of Care is determined by a combination of a pro rata need based on the Supportive Housing Program formula, Shelter use, and the integration of Entitlement City HPRP funds with the state program. On April 9, 2009, IHCDA convened the Indiana HPRP Summit to present how the structure of the state program. The chairs of local Continua and representatives of entitlement cities were invited to the summit. The state program asks that local Continua identify a "central access center" for all homeless assistance within the Continuum. At the summit, local Continua of Care were asked to respond to a Letter of Intent to participate with state program by April 30, 2009 and to form an implementation committee. Upon receipt of the LOI, IHCDA will issue an RFQ to participating Continua of Care to identify an organization serving as the central access center and the fiscal agent for the HPRP funds. The RFQ is due June 15, 2009. In the case of Continua of Care that included an Entitlement city receiving HPRP funds, the RFQ will also ask the Continuum to identify how the local unit of government intends to integrate their funds with then central access center. Final allocation will be determined by the strength of qualifications and integration of Entitlement funds.

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: IHCDA is allocating HPRP funds through the Continuum of Care structure. Each Continuum of Care intending to participate in the state program are required to submit a Letter of Intent to participate in the state program by April 30, 2009 and form an HPRP Implementation Committee no later than May 15, 2009. IHCDA will work with the Implementation Committees to design their local program through a central access center and fiscal agent. Each participating Continuum will be required to respond to an RFQ designed to qualify sub-grantees. The RFQ is due by June 15, 2009. IHCDA will use a portion of HPRP administration funds to provide training to qualified sub-grantees in July of 2009. Training will include the following

areas: 1) HPRP grant administration, 2) Assessment and Triage, 3) Direct Service administration (eligibility, inspection, rental and utility assistance, etc., 4) Housing Placement case management, and 5) data collection. This training is designed to provide sub-grantees capacity to provide assistance after contracting with IHCDA. IHCDA is also developing standardized assistance documents and a common HMIS based assessment tool to qualify participants. Following the training and contracting with HUD, IHCDA will sign agreements with local sub-grantees by September 15, 2009. The sub-grantee agreement will require assistance to begin no later than October 1, 2009 and will require sub-grantees to draw down 75% of their HPRP allocation within two years.

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: IHCDA currently administers Shelter Plus Care, HOPWA, ESG and HOME TBRA programs. From this foundation, IHCDA will develop a monitoring tool to oversee the expenditure of HPRP funds. Existing monitors will be utilized to monitor HPRP sub-grantees. In order to better track funds to eligible activities, IHCDA will require a bi-monthly draw down of funds with standardized documentation. IHCDA will develop and require use of standardized direct assistance documents based on the agency's experience with the HOPWA, Shelter Plus Care and HOME TBRA programs. Each sub-grantee will be monitored quarterly throughout the program. Further, IHCDA will create a web based FAQ to provide on-going technical assistance to sub-grantees.

IHCDA intends to closely monitor the fiscal and programmatic implementation of the HPRP. Each selected sub grantee is required to demonstrate an established fiscal capacity to effectively establish and track contractual arrangements with landlords, utilities, moving companies and other providers of eligible services. Tracking must be at the individual participant level with detailed reporting echoed to the HMIS. The fidelity of financial tracking is monitored each quarter in preparation of the required report, with the central access center sub grantee expected to reconcile any discrepancies prior to any further draw down from IDIS.

Use the HPRP funds is monitored through assertive oversight of the housing plans, authorized services and functional outcomes in the HMIS. These areas of the database are reviewed on a bimonthly basis for each central access center. Additionally, on site monitoring of actual participant level activities is conducted by IHCDA staff on a decreasing schedule of frequency, beginning with bi monthly visits during the first year of the program and decreasing to biannual during the second and third years. Any significant departure from expected practice and/or failure to continuously meet outcome objectives triggers a plan of correction, which may involve closer monitoring, or a reallocation of funds, if necessary.

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 Indiana Housing and Community Development Authority received ARRA funds for several relevant purposes including HOME funds in support of LIHTC projects and the Weatherization program. These programs have an indirect relationship to the HPRP effort but weatherization will be linked as a possible benefit for households facing homelessness. Continuing discussions and planning are underway with the Indiana Family and Social Services Administration (FSSA) around ARRA funds related to health, welfare and vocational services. In particular, our prescreening tool, the Indiana Housing Opportunities Planner, will be linked to the welfare enrollment system that serves all 92 counties and is the point of access for food stamps and TANF. All the selected Central Access centers in each Continuum of Care will be enrolled as Vcan sites, allowing electronic interchange of benefit information and we are exploring the installation of our prescreening assessment at the *WorkOne* Centers that serve as central enrollment centers for unemployment and vocational training benefits affected by the ARRA funds.

   Additionally, IHCDA is in discussion with the Indiana Department of Corrections and the FSSA Divisions of Mental Health and Addiction and Division of Vocational Rehabilitation to address the housing needs of persons affected by ARRA funds to these state and local agencies.

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: All of the Indiana Continuum of Care(C of C) regions and entitlement cities are invited to participate in a consistent, statewide approach to the HPRP. Each C of C is to solicit an agency to serve as a Central Access Center for that region. This entity will be the region's sub grantee and is responsible for the evaluation of eligible participants; gathering of required HMIS data; selection and inspection of eligible rental housing; creation of agreements with landlords, utility companies; and other support providers and issuance of vouchers for payment. Each C of C develops an arrangement appropriate to local conditions.

   The Central Access Centers are bonded together through a common prescreening tool and a customized HMIS, which includes standardized assessment of household function on eight dimensions. The prescreening tool used at the single point of access

is an enhanced form containing matching information about specific homelessness and housing programs in Indiana. Each Access Center will also be enrolled as a Vcan site, allowing access to multiple state entitlement and benefit programs. The Access entities also have available a special needs version of the Social Serve Indiana Housing Now housing locator that serves as a real time housing match for rental units specifically designated for the HPRP effort. The concept of a central access center allows concentration of the resources of the IHCDA and the Indiana FSSA to assist more fully at risk and recently homeless households to move quickly back into permanency.

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 2008 Consolidated Plan outlines six planning principles that have guided our planning for the use of HPRP funds. Our plan emphasizes local participation, allocating funds for the greatest impact and leveraging resources to transform the homelessness system. Specific priorities in the Plan to End Chronic Homelessness that are applicable include (1) enhancing prevention activities and strategies, (2) enhancing and coordinating support systems and (3) optimizing use of existing mainstream resources. We believe that our plan will assist in achieving the strategic goals related to chronic homelessness as well as prevent households from falling into homelessness. In particular, we wish to target the goal to "Reduce the number of homeless individuals and families who cycle through emergency systems." In the belief that safe, stable and affordable housing is a key component of overall household recovery, we intend to use the HPRP funds as a "tipping point" to avoid a downward spiral into chronic homelessness and/or reliance on long term supports.

   By allocating the funds through an organized single point of access, we intend to bring as many mainstream resources as possible to bear upon a distressed household with only moderate barriers to housing permanency. Our access centers will allow immediate enrollment in applicable entitlements, close coordination with state vocational supports and a consistent, sustained level of housing case management built around a plan for household housing permanency.

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]	$ 3,991,920.00	$ 7,413,565.71	$ 11,405,486.16
Housing Relocation and Stabilization Services[2]	$ 1.340,144.57	$ 2,488,839.92	$ 3,828,984.64
Subtotal (add previous two rows)	**$ 5,332,064.56**	**$ 9,902,405.62**	**$ 15,234,470.80**

Data Collection and Evaluation[3]	$ 244,403.20
Administration (up to 5% of allocation)	$ 814,677.00
Total HPRP Amount Budgeted[4]	**$ 16,293,551.00**

[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."

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)

	May 1, 2009
Signature/Authorized Official	Date

Executive Director

Title