

## **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.

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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>  | State of Minnesota                       |
| <b>Name of Entity or Department Administering Funds</b>                                  | Minnesota Department of Human Services   |
| <b>HPRP Contact Person</b><br>(person to answer questions about this amendment and HPRP) | Pat Leary                                |
| <b>Title</b>   | Office of Economic Opportunity           |
| <b>Address Line 1</b>  | PO Box 64962                             |
| <b>Address Line 2</b>  | 444 Lafayette Road                       |
| <b>City, State, Zip Code</b>   | St. Paul, Minnesota 55164-0962           |
| <b>Telephone</b>   | (651) 431-3824                           |
| <b>Fax</b>   | (651) 431-7509                           |
| <b>Email Address</b>   | pat.leary@state.mn.us                    |
| <b>Authorized Official</b><br>(if different from Contact Person)                         | Connie Greer                             |
| <b>Title</b>   | Director, Office of Economic Opportunity |
| <b>Address Line 1</b>  | Same as above                            |
| <b>Address Line 2</b>  |  |
| <b>City, State, Zip Code</b>   |  |
| <b>Telephone</b>   | (651) 431-3810                           |
| <b>Fax</b>   | (651) 431-7509                           |
| <b>Email Address</b>   | connie.greer@state.mn.us                 |
| <b>Web Address where this Form is Posted</b>   | www.dhs.state.mn.us                      |

|   |                     |
|---|---------------------|
| <b>Amount Grantee is Eligible to Receive*</b> | <b>\$10,865,236</b> |
| <b>Amount Grantee is Requesting</b>           | <b>\$10,865,236</b> |

\*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).

The State of Minnesota's current Citizen Participation Plan, drafted in accordance with Section 91.115 of HUD's Consolidated Plan regulations, contains a section which specifically addresses the issue of "Substantial Amendments". Included in this section are steps needed to be taken to comply with the public participation process.

The state will publish an ad in the StarTribune as set-forth in the Public Participation Plan as well as to other interested organizations. The Homeless Prevention and Rapid Rehousing Program requires a 12-day public comment period, which will be reflected in this ad. The ad will include where to get a copy of the HPRP Substantial amendment, the time period for comments and the time and location of the public hearing.

The state will distribute the Substantial Amendment to the list of repositories attached to the Public Participation Plan. Repository sites include libraries, Regional Development Commissions, Housing Partnership's Regional Network Project Offices, Minnesota Initiative Offices and various Councils, Associations and other locations.

After the public comment period is over, the state will hold a public hearing in a location that is accessible for physically disabled citizens.

Comments will be accepted by the state in writing, including emails. Comments will be summarized and published along with a reason why comments were or were not incorporated into the amendment.

The state will provide a substantive written response to all written complaints related to the Consolidated Plan, amendments and the Consolidated Annual Performance and Evaluation Report (CPER) within 15 working days of the receiving of the complaint.

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.

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To be determined.

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 determined.

**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:

As soon as the Minnesota Department of Human Services (DHS) receives notification of a funding award, it begins development of a Request For Proposals (RFP) using MN-DHS standards. The RFP communicates:

- Funding available
- Eligible applicants
- Administrative costs
- Reporting requirements
- The application review process
- Timeline for the application process
- Timeline for the grant
- Forms
- Definitions
- Related regulations
- Award criteria

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

Notice of the RFP is sent to the State Register and copies of materials are sent to current grantees and other interested organizations.

When applications are received, they are reviewed by a committee. All external reviewers agree to abide by a Conflict of Interest Policy.

Proposals are scored according to criteria described in the RFP. The review committee is asked to provide substantive comments on the strengths and weaknesses of each application section and a total score is provided for each submission.

When all applications have been reviewed, scores are entered into a spreadsheet, a final determination of which responders will be funded is made, and award letters sent out.

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:

Timeline and plan in place to ensure that the HPRP funds are allocated to sub grantees no later than September 30<sup>th</sup>, 2009 as required by the HPRP notice. The timeline is as follows:

*Please note that all of these dates are tentative and could be moved up pending the receipt of the HPRP Grant Agreement from HUD.*

6/1/09: Issue HPRP Request for Proposals

7/1/09: HPRP Applications due

7/1-7/31: HPRP Application Review Process

8/1/09: HPRP Sub-Grantees Announced & Contracts are Sent Overnight to Grantees

8/15/09: HPRP Contracts are due to DHS with Sub-Grantee Authorized Signatures with Approved Budgets and Workplans attached. DHS will begin the encumbrance process.

8/15-9/15/09: DHS will encumber all HPRP sub grantee contracts.

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).

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### Response:

Bi-annually Department of Human Services (DHS) Office of Economic Opportunity (OEO) staff reviews all ESGP grantees using a Grantee Assessment Tool (GAT) based on the HUD risk analysis tool. The tool has three broad areas of analysis:

- General agency information, including such factors as Executive/Fiscal Director turnover, unresolved monitoring findings, agency systems and board function.
- Program Operations including compliance and reporting issues, partnerships and linkages and the quality of programming based on monitoring.
- Fiscal Operations including Audit findings, unresolved fiscal problems, fiscal systems and procedures, program deficits and accurate reporting.

The Grantee Assessment Tool (GAT) allows DHS to determine if a grantee needs immediate attention or can receive on-site monitoring as a part of the regular bi-annual rotation. In either case, the focus of the monitoring will include any risk areas highlighted by the risk analysis tool. The regular monitoring rotation ensures that grantees are monitored at least once during every grant cycle.

Grantee concerns whether identified through the GAT process or via a monitoring visit are addressed in a timely manner. Some issues must be addressed immediately while others are dealt with over time.

Desk monitoring including monthly fiscal reporting is provided throughout the grant period and consists of open communication and joint problem solving with grantees, analysis of monthly fiscal reports, annual audits, and required program reports.

The on-site monitoring tool looks at the overall agency capacity and systems in place to deliver services determined through a guided discussion with program managers and direct service staff. Areas include an overview of the strengths and challenges facing the community and participants, coordination and collaboration efforts, major changes staff or board changes, information systems, outcomes, fiscal systems, supportive service referral and board function. A random selection of participant files is reviewed for specific documentation on homelessness, data privacy, disability status, case management, follow-up and supportive services. In addition, there is a verification of homeless participation in policies and project development, ensuring that the expected number of participants are being served and timeliness of grant expenditures.

Grantees receive a written monitoring report after the visit. An OEO Field Representative provides technical assistance to grantees throughout the year.

DHS conducts a customer satisfaction survey to secure input for program improvement and development. Training and grantee meetings are held periodically as needed. The workplan, customer satisfaction survey, on-going open communication and training events provide grantees with a variety of opportunities throughout the grant period to ask questions and provide feedback.

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**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 Minnesota Department of Human Services maintains membership on the Minnesota Interagency Council On Homelessness (MICH), whose mission it is to coordinate the activities of state agencies in addressing the issue of homelessness. Members of the MICH include: Minnesota Housing, the Minnesota Department of Corrections, the Minnesota Department of Public Safety, The Minnesota Department of Human Services, the Minnesota Department of Veterans Affairs, the Minnesota Department of Education, the Minnesota Department of Employment and Economic Development.

The state hosted a meeting of state departments and entitlement jurisdictions under the Homeless Prevention and Rapid Rehousing Program on April 14, 2009, to facilitate coordination of American Recovery and Reinvestment Act funds are coordinated.

The Minnesota Department of Human Services oversees both the HPRP funding and the Temporary Assistance to Needy Families stimulus funds and held its first meeting on April 10, 2009 to discuss how these funds will be coordinated.

The Minnesota Department of Human Services has been in contact with the Minnesota Department of Corrections to discuss a potential application for federal Second Chance act funding.

The Minnesota Department of Education presented its plan for use of Education of Homeless Youth funding at a Continuum of Care subcommittee meeting of the MICH.

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:

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The Minnesota Interagency Council on Homelessness employs a subcommittee on Continuum of Care coordination to ensure coordination between the state and local CoC's. This group meets monthly. At the April 2009 meeting, CoC coordinators were informed of the state's initial plans for use of the HPRP funds. CoC coordinators were encouraged to bring this information back to their respective committees and to contact the state with their ideas on how the HPRP funds should be used.

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 HPRP program will coordinate with the strategic plan that Minnesota outlined in its Consolidated Plan (FY 2007-2011).

Coordination will ensure consistency between the HPRP and the consolidated plan in the following outlined objectives in Minnesota's plan: 1) create suitable living environments, 2) provide decent affordable housing and 3) create economic opportunities for people experiencing (or at-risk of) homelessness within the state. DHS along with sub grantees will ensure that households receiving financial assistance through HPRP will be in housing (rental units) that are up to code, safe and meet all standard inspections. DHS sub grantees will ensure that households assisted through HPRP's financial assistance will be able to afford the housing they are in (with the rental subsidy limit of 18 months) both while they are receiving HPRP financial assistance and once they go off of it. DHS will emphasize that HPRP funding will create economic opportunities in the state of Minnesota through the creation of additional employment opportunities and economic growth within the state.

HPRP activities will be consistent with the outcomes outlined in the Consolidated Plan. DHS will align and coordinate HPRP funds with other State efforts to provide availability and increased accessibility to affordable housing and to ensure the affordability and sustainability of affordable housing in Minnesota. DHS works closely with other State departments, the regional Continuum of Care committees, Counties and Tribes, as well as local community and faith based non-profits in meeting the outcomes outlined in the Consolidated Plan.

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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.

| <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>                          | \$4,898,049                    | \$1,799,283             | \$6,697,332                  |
| Housing Relocation and Stabilization Services <sup>2</sup> | \$2,099,164                    | \$1,199,522             | \$3,298,686                  |
| <b>Subtotal</b><br>(add previous two rows)                 | <b>\$6,997,213</b>             | <b>\$2,998,805</b>      | <b>\$9,996,018</b>           |
| Data Collection and Evaluation <sup>3</sup>                |                                |                         | \$325,957                    |
| Administration (up to 5% of allocation)                    |                                |                         | \$543,261                    |
| <b>Total HPRP Amount Budgeted<sup>4</sup></b>              |                                |                         | <b>\$10,865,236</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.”

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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)

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Signature/Authorized Official

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Date

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Title