

A. General Information

Grantee Name	City of Cambridge, Massachusetts
Name of Entity or Department Administering Funds	Cambridge Department of Human Service Programs (DHSP)
HPRP Contact Person (person to answer questions about this amendment and HPRP)	Stephanie Ackert
Title	Director of Planning and Development
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Web Address where this Form is Posted	www.cambridgema.gov/DHSP2/HPRP.cfm

Amount Grantee is Eligible to Receive*	\$1,302,128
Amount Grantee is Requesting	\$1,302,128

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

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 Department of Human Service Programs (DHSP) placed discussion of the HPRP Substantial Amendment on the published agenda of the Homeless Services Planning Committee for its regular monthly meeting to be held April 9, 2009. This meeting is open to the public, particularly providers of services for homeless persons and consumers or former consumers of such services. The meeting was attended by approximately 40 persons. DHSP placed a legal notice in the *Cambridge Tab* newspaper for a public hearing to be held on April 16, 2009. The legal notice directed the public to the draft Substantial Amendment for review at the Central Square branch of the Cambridge Public Library and the DHSP offices and on-line at the DHSP web site. The notice advised that the public could submit comments from the time the draft was released on April 15 until 5:00 p.m. on May 1, 2009. The public hearing was attended by approximately 12 persons, many of whom gave testimony, in addition to several DHSP staff. At both the Homeless Services Planning Committee meeting and the public hearing a draft working paper providing more operational details of the proposed program was distributed to participants. Written testimony was received from one individual and four agencies. All public comments, oral and written, were accepted.

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:

Notes from Homelessness Prevention and Rapid Rehousing Public Hearing
April 16, 2009
5:30 – 7:30 p.m.
344 Broadway, Second Floor Conference Room
Cambridge, Massachusetts

Please be advised that after considering the oral testimony described below and written testimony from the public on the proposed Substantial Amendment, the Department of Human Service Programs has made changes to the Amendment as follows:

- Legal assistance has been added to the list of possible services to be purchased.
- The amount of funds set aside for services has been increased from \$300,000 to \$350,000. Of this amount, funds for purchasing services from community agencies have been increased to \$165,000, with the remainder of the service money to be used for increased services at the Multi-Service Center. The additional service funds have resulted in a corresponding decrease in funds for financial assistance. The new funding allocation is shown Section E, Estimated Budget Summary.

Jackie Neel, Deputy Director of the Department of Human Service Programs, welcomed participants to the Public Hearing and introduced departmental staff Fred Berman, Len Thomas, Lara Plaskon and Stephanie Ackert.

Fred Berman provided an explanation of the timetable and process for submitting the Homelessness Prevention and Rapid Rehousing (HPRP) Substantial Amendment to the FY 2009 One Year Action Plan to HUD, and called attention to the draft program description. Both of these documents were available at the hearing. He noted that HUD's guidelines for HPRP are broad, with many details on procedures to be worked out locally over time. We are expecting the need for the funds to exceed the dollars available.

Ellen Shachter asked for a clarification of whether the Rapid Rehousing in the program description would include both families and individuals. Fred Berman answered that it would.

Samara Grossman of HomeStart stated that she enjoyed the idea of extending case management services in this way and of using the Multiservice Center as a nexus, a one-stop for stressed families and individuals. She recommended that an integrated team model be considered. Such a team might consist of a Multiservice Center Prevention Specialist and two or three Prevention Specialists from other agencies. A Representative Payee and a half time legal services person should also be on the team. A team approach lessens the clients' feelings that they are just being handed off. She would like to see enriched services and implementing of best practices, particular for such subgroups as domestic violence survivors. Also, HomeStart has had good success with a post-placement stabilization model with different levels of service based on need, ranging from four quarterly check-ins with the client to more intensive services. The Rapid Rehousing component needs funds for services, not just leveraged services. She would like to see a choice of billing options, hourly billing (which may add to the administrative burden) or the usual reimbursement method.

Fred Berman reminded participants of the challenge of figuring out how to divide funds between cash assistance and services. If more money is allocated for services, unless there is some resource option not yet identified, those funds would need to come out of client assistance. Speakers were asked to identify from where the additional funds for services should come.

Kathy Watkins introduced herself as a Section 8 tenant in Cambridge, recently elected to the Board of the Alliance of Cambridge Tenants, which brings together section 8 and public housing tenants. She spoke of the importance of legal assistance, since many tenants do not know their rights. A landlord moves to evict and people don't know how to respond. Recent cuts in legal services funds have resulted in lawyers not working full time at CASLS.

Fred Berman noted that the DHSP has received a letter from CASLS and CLSACC asking that \$60,000 be allocated for CASLS and \$15,000 for CLSACC.

Shams Mirza of 1 Lincoln St., the new housing at North Point, recalled the situation at his former residence at 55 Magazine St. A new buyer was implementing inordinate rent increases and wanted to evict all tenants. Ellen Shachter and Susan Hegel of CASLS came to the building at least 20 times to assist the tenants and many have remained housed there. He spoke of how the confidence of even a well-educated professional person is shaken by receiving an eviction notice. It is important and cost effective to fund legal services to help people avoid becoming homeless in the first place.

Deborah Filler of CASLS agreed that most of the funds should go to client assistance. There are relatively straightforward cases where arrearages are cured and case managers are able to help people negotiate to stay in their housing, but there are countless types of eviction cases that cannot be resolved without legal representation. Some examples include recalculations of rent, "for cause" evictions involving hoarding, psychiatric illness, criminal activity, illegal occupants and behavioral problems. With cutbacks from other sources it will not be possible for legal services to assist these new clients without HPRP funding.

John Froio, Assistant Legal Director at CLSACC, noted that Interest on Lawyers Trust Accounts (IOLTA) grants funded out of real estate fees have been down 54% over the last year, because of lowered interest rates and fewer real estate transactions. MLAC funds are down 10%, and reductions are expected at the Boston Bar Association and Massachusetts Bar Association. This is cutting into resources for legal service agencies. He noted that many times legal services are not called in until the legal proceedings have already begun; some landlords will not negotiate until they are at the courthouse.

Larry Gottlieb, Director of Homeless Services at Eliot Community Human Services noted his agency's involvement in providing services for the homeless in Cambridge. One of these services is a benefit maximization statewide project funded only through June 2009. The project helps people get Social Security and disability benefits which are essential for being able to afford housing. Project staff support and accompany clients to their medical determination appointments. Typically there is only a 30% approval rate on claims made by homeless individuals but Eliot's success rate under the project is 70%. Many failures are due to procedural issues. A benefits specialist is paid \$37,500 plus 24% benefits and travel costs. He would like to see Cambridge HPRP funds of a little under \$100,000 used to fund this project over two years; he described the benefits maximization program as "shovel ready". (The needed funds would actually be less because the specialist is only in Cambridge four days a week, spending the fifth day in Lynn.)

Charyti Reiter, Program Director at On the Rise, said she felt the city plan is good but wants to advocate for inclusion of legal services. Saying she did not know which pool funds should come from, she indicated that if you have money but the landlord is still unwilling to work with you an intervention is unsuccessful.

Ellen Shachter endorsed the importance of the Eliot project. She also stated that she is concerned that there may be a "creaming process" for selecting Rapid Rehousing participants. She would like to see people evicted from public housing, people who have criminal backgrounds and many families now ineligible for both shelter and housing included in the program. She indicated that \$300,000 should be enough to cover all services including legal services but if that is not the case the legal services funds would need to come out of the Rapid Rehousing cash. She spoke of legal services as an important step before money and representative payee services

Fred Berman stated that under HUD guidelines this assistance is targeted to people who have a good prognosis of being able to sustain housing. If either their income or services will not be adequate they are likely to be deemed inappropriate for this program.

Peter Shapiro of the Just A Start landlord-tenant mediation program, which is funded by the Community Development Department, described his agency's services. Sometimes there is telephone or face-to-face mediation but much of their work involves "collaborative law", getting a landlord to keep tenants and work out a solution instead of going to court. He anticipates high landlord interest in the HPRP. He remarked that the other local mediation agency provides fine services but with a different service model. His program serves Malden, Medford and Everett as well as Cambridge.

A resident endorsed funding for attorneys because other advocates and service coordinators do not know the fine points of the law.

Jackie Neel inquired whether anyone else in the audience would like to speak.

Len Thomas explained that there will be a limit on assistance to people in government subsidized housing, with possible eligibility for up to six months of cash assistance for the tenant's portion of a housing or utility arrearage but not for an ongoing subsidy. This guidance comes from the HUD Homeless Resource Exchange Frequently Answered Questions on HPRP page.

Ellen Shachter suggested asking HUD for clarification for instances where rent is based on income versus a flat subsidized rent. She also suggested the possibility that those assisted could still retain homeless preference for state public housing, moving from transitional to permanent housing.

Fred Berman noted that HUD's guidance regarding any ongoing subsidy seems clear and that HUD does not see this as replacing existing homeless programs.

Larry Gottlieb said that Somerville's interpretation matches Cambridge's, Newton is seeking further clarification and Medford and Malden believe no HPRP assistance of any type can be made available to tenants in subsidized housing. He asked how the city will gather the information necessary for the high level of scrutiny HUD will require on the success of any HPRP spending.

Fred Berman said that this would be part of the role of the case management and stabilization services we are proposing, but there may be an issue for clients whose needs for subsidy or services exceed the length of the program.

Samara Grossman asked about special attention to certain groups such as domestic violence survivors or people with CORI problems. It might be necessary to zero in on one or two groups for special services and to allocate the rest of the resources to people with only Tier 1 service needs.

Fred Berman indicated that choices we will have to make are already very difficult. The broader eligibility at 50% of median income will make many long-time working Cantabrigians eligible for assistance for which they have never qualified before. The multidisciplinary committee will need to make case-by-case decisions and weigh and facilitate other resources for clients.

Larry Gottlieb said Malden and Medford are viewing the HPRP assistance as funding of last resort, taking care to use other available resources first.

Peter Shapiro spoke about the challenge of figuring out when to terminate cash assistance and how critical it is to measure success.

Len Thomas said cash assistance renewals can only be provided at a maximum of three month intervals, and some clients will need monthly monitoring. The multidisciplinary committee will review requests from everyone's clients and referring agencies can advocate on behalf of clients. It is also critical that there be participation in services and not just acceptance of cash assistance. He likes the HomeStart New Frontiers program with gradually decreasing subsidies and services.

Fred Berman added that for the state-funded Interagency Council on Housing and Homelessness regional partnerships families must be eligible for Emergency Assistance. Individuals can be served by the state-funded Rapid Rehousing component. There will be many opportunities to learn from the different service configurations in the state-funded and the HUD-funded programs.

Larry Gottlieb mentioned that the \$18.4 million Balance of State funds will be available also to entitlement cities and that state hearings will be taking place April 22 and 23.

Fred Berman said that the state is proposing that 70% of the HPRP funds for families will go to Rapid Rehousing and 30% for Prevention. The Balance of State funds will be made available to non-entitlement communities and possibly communities like Chelsea, Brockton and Fall River. After HUD approves the state amendment an RFP will be issued.

Jackie Neel detailed the timetable for comments and submissions. Written comments may be submitted until 5:00 p.m. on May 1. The Substantial Amendment and a record of comments will go to HUD on May 8. HUD approval is expected by June 21 and the program would begin as soon as possible thereafter.

The hearing was adjourned at 7:30 p.m.

Note: There were several meeting attendees who did not sign in with their names and addresses.

Written testimony from one resident and four agencies provided a number of suggestions on the service model. Also included were requests to fund legal services, additional case management, representative payee services, domestic violence services and extended child care coverage for job-seekers.

C. Distribution and Administration of Funds

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: We will indicate the services required (stabilization, housing search, money management assistance, legal assistance, and other services allowed by HUD which are determined to be essential to the success of our homelessness prevention and/or rapid re-housing efforts) and will seek competitive bids to provide \$165,000 worth of such services over a projected 30-month period. In seeking such bids, we may prioritize proposals from providers that are able to offer a flexible mix of two or more such services, so that we are best positioned to respond to the mix of needs that manifest over the term of the contract. We will contract with one or more vendors with a track record of delivering such services, who are familiar with the Cambridge community, who are reliable partners in terms of compliance with reporting and HMIS participation requirements, and who can serve the anticipated mix of individuals and families. We may also prioritize qualified bids that are flexible enough within the contracted amount to allow for increased staffing when the demand for assistance is greatest and diminished levels of staffing when the demand for assistance is lower.

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: As per the HUD requirement, the City will execute our contract(s) with the subgrantee(s) prior to September 30, 2009. As soon as the City submits this Substantial Amendment, we will begin the process of working with our community partners to complete the planning needed to initiate the competitive bidding process described in #2. As soon as the City receives word from HUD that its Amendment has been accepted, the City will issue its Request for Bids, describing the kind of quick turnaround required. As the grantee for the Cambridge Continuum's SHP and ESG programs, the City is experienced at expediting the contract process, and has the protocols in place to ensure compliance with program requirements.

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 City will use approximately 14% of HPRP funds to supplement existing staff at its Multi-Service Center, 13% to purchase supplemental services described in #2, 66% to fund direct assistance to eligible households as defined in FR-5307-N-01, 2% to help with HMIS-related costs, and 5% for admin, including a proportionate share to partnering vendor agencies. Clients and client services, including HPRP funds used to provide direct client assistance will be tracked by the Cambridge HMIS, which is administered by the City's Department of Human Service Programs (DHSP) for the Cambridge Continuum. The DHSP, which has experience overseeing existing CDBG, ESG, and SHP contracts totaling over \$3 million/year will exercise oversight over the flow of all HPRP funds, ensuring that municipal staff and vendor employees properly document time and expenses, and properly verify the income of applicants for HPRP assistance. In addition, the DHSP will work closely with City fiscal staff overseeing all federal stimulus funds to ensure proper expenditure and reporting.

Use of HPRP funds to prevent homelessness and/or rapidly re-house persons that have become homeless will follow guidelines in FR-5307-N-01. Because the magnitude of need is expected to exceed available funds, the City anticipates implementing a decision-making process entailing case-by-case consideration of client circumstances to determine the amount and/or duration of assistance; we anticipate convening a committee of non-profit partners to help shape the decision-making framework and then to make many such case-by-case decisions.

Generally speaking, the City anticipates that awards of HPRP assistance may be conditioned on such factors as the willingness of landlords to offer housing to tenants; the willingness of tenants to comply with the terms of their

leases, including payment of a reasonable share of housing costs, based on considerations of income, assets, and reasonable expenses; the willingness of utility companies to restore or retain customer services; and other factors related to housing stability.

As per HUD requirements, all HPRP-funded assistance will be offered pursuant to a case management assessment. The offer of assistance may be further contingent upon agreement by the recipient to work with a case manager to maximize participation in mainstream benefits or to accept supportive services, including stabilization case management, housing search assistance (if, for example, the City determines that the recipient's housing is not sustainable in comparison to the recipient's projected income over the proximate future, or if the recipient appears to require a housing subsidy or subsidized housing in order to ensure housing stability), job search assistance, money management assistance, addiction or counseling services, or other services reasonably related to the ability of the beneficiary to retain housing.

To the extent that HPRP funds are used to rapidly re-house individuals or families that have become homeless, the City may require that the beneficiary of HPRP funds agree to maintain a working relationship with a Cambridge Continuum stabilization case manager for the duration of HPRP assistance, and may limit such assistance to applicants who are already linked to provider agencies that are willing and able to offer such extended services.

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 Cambridge DHSP is committed to collaborating with any and all organizations receiving ARRA funds, in order to ensure that client households are able to access supports they need. Through the City's Office of Workforce Development (whose director sits on the WIB) and municipally operated Cambridge Employment Program and in partnership with the local Career Center and other employment services providers, we will maximize resident access to ARRA-assisted job training and employment services. In addition to utilizing City case managers to connect eligible households with mainstream resources, we will continue to collaborate with a range of partners who can connect eligible households to ARRA-related resources:

- with the Cambridge Health Alliance, and other organizations supporting health care access to maximize access to COBRA and Mass Health/Medicaid coverage;
- with the Cambridge Housing Authority, which we anticipate will utilize ARRA funding for modernization and energy efficiency work on its public housing units, and to expand the number of subsidies available;
- with the local child care and Head Start provider network to facilitate parent access to the child care they need to sustain education, training, job search, and employment;
- with the Cambridge School Department to ensure that children in shelters and the Gateway Inn are able to access ARRA-enhanced resources for educating homeless children;
- with the Cambridge Student Partnership, the Food Pantry Network, and other providers offering benefits counseling and enrollment assistance to maximize access to expanded Food Stamps, school meals, Fuel Assistance, lead abatement, and home weatherization assistance.

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: As convener of the Cambridge Continuum and coordinator of the Continuum's HMIS, the DHSP will take a leadership role in providing and documenting HPRP assistance, and will leverage hundreds of thousands of dollars in municipal resources to support those efforts. We anticipate that one or more Continuum providers experienced in stabilizing CoC clients in scattered site permanent supported housing will contract with the DHSP to provide housing search, case management, and stabilization assistance to prevention clients, and will contribute leveraged services to support the post-placement stability of re-housed clients. We anticipate that Continuum partners (as listed in our Consolidated Plan) that offer mediation services, legal services, veteran services, case management and related assistance connecting clients with mainstream benefits, employment services, clinical services, and disability services will likewise work collaboratively to support HPRP prevention and re-housing efforts. We expect to partner with other City programs -- Schools and Community Schools, Child Care, Council on Aging -- and non-profit and faith-based partners -- food pantries, settlement houses, community centers, etc. -- as well as large landlords, and Cambridge Housing Authority to publicize the availability of assistance, steer at-risk households towards that assistance, and help stabilize households that have received assistance. The Cambridge DHSP and other key Continuum partners are co-founders and leaders in the Metro

Boston Network, a regional partnership convened with State funding support to regionally implement homelessness prevention and re-housing efforts; the Network will provide a forum for honing and sharing best practices among ourselves and with other HPRP communities.

- 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: As described in the City's Consolidated Plan, there are many possible contributing factors and many paths that lead to homelessness. Without the kind of countervailing resources made available through ARRA, the economic downturn could precipitate the homelessness of people from a broad swath of the economic spectrum, ranging from previously stable households that have lost heretofore reliable employment income, to households in which economic stresses have led to domestic violence, to tenuously employed households whose limited education or employability make them prime targets for early layoffs and poor candidates for re-employment, to chronically vulnerable households facing multiple and often inter-related challenges including low income, clinical or medical issues, and/or less-than-adequate independent living skills.

Mobilizing resources to prevent such households from slipping into homelessness is an integral element of our Consolidated Plan, and beefing up such prevention services at a time of heightened economic crisis is completely consistent with that Plan. Working to rapidly re-house and stabilize individuals and families that have become homeless -- or that are teetering on the edge of homelessness -- and linking them to all possible mainstream resources, helping them access employment (or better employment), and providing stabilization services to support housing retention are all features of our Consolidated Plan that are likewise part of our plan for implementing HPRP resources.

Finally, of course, using HMIS to track HPRP clients and services is consistent with the Consolidated Plan's focus on using HMIS to track McKinney clients and services.

Simply put, the infusion of HPRP resources adds more capacity to an already-constituted infrastructure of prevention and re-housing-related programs and services which is described and endorsed by our Consolidated Plan, and therefore, the proposed use of HPRP resources is consistent with that Consolidated Plan.

E. Estimated Budget Summary

	Homelessness Prevention	Rapid Re-Housing	Total Amount Budgeted
Financial Assistance	645,000	215,128	860,128
Housing Relocation and Stabilization Services	350,000	(leveraged)	350,000
Subtotal	995,000	215,128	1,210,128
Data Collection and Evaluation			30,000
Administration (up to 5%)			62,000
Subtotal			1,302,128