

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

Grantees eligible to receive funds under the Homelessness Prevention and Rapid Re-Housing Program (HPRP) are required to complete a substantial amendment to their Consolidated Plan 2008 Action Plan. This form sets forth the required format for this substantial amendment. A completed form is due to HUD within 60 days of the publication of the HUD HPRP notice.

To aid grantees in meeting this submission deadline, the HPRP Notice reduces the requirement for a 30-day public comment period to no less than 12 calendar days for this substantial amendment. With this exception, HPRP grantees are required to follow their Consolidated Plan's citizen participation process, including consultation with the Continuum of Care (CoC) in the appropriate jurisdiction(s). Grantees are also required to coordinate HPRP activities with the CoC's strategies for homeless prevention and ending homelessness. To maximize transparency, HUD strongly recommends that each grantee post its substantial amendment materials on the grantee's official website as the materials are developed.

A complete submission contains the following three documents:

- 1) A signed and dated SF-424,
- 2) A completed form HUD-40119 (this form), and
- 3) Signed and dated General Consolidated Plan and HPRP certifications.

For additional information regarding the HPRP program, visit the HUD Homelessness Resource Exchange (www.hudhre.info). This site will be regularly updated to include HPRP resources developed by HUD and its technical assistance providers.

The information collection requirements contained in this application have been submitted to the Office of Management and Budget (OMB) for review under the Paperwork Reduction Act of 1995 (44 U.S.C. 3501-3520). This agency may not collect this information, and you are not required to complete this form, unless it displays a currently valid OMB control number.

Information is submitted in accordance with the regulatory authority contained in each program rule. The information will be used to rate applications, determine eligibility, and establish grant amounts.

Public reporting burden for this collection of information is estimated to be 16 hours, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. This information is required to obtain benefits. To the extent that any information collected is of a confidential nature, there will be compliance with Privacy Act requirements. However, the substantial amendment to the Consolidated Plan 2008 Action Plan does not request the submission of such information.

Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

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A. General Information

Grantee Name	City of Grand Rapids
Name of Entity or Department Administering Funds	Community Development Department
HPRP Contact Person (person to answer questions about this amendment and HPRP)	Connie M. Bohatch
Title	Acting Chief Services Officer
Address Line 1	300 Monroe, NW, City Hall Suite 460
Address Line 2	
City, State, Zip Code	Grand Rapids, MI 49503
Telephone	616.456.3988
Fax	616.456.4619
Email Address	cbohatch@grcity.us
Authorized Official (if different from Contact Person)	Eric R. DeLong
Title	Interim City Manager
Address Line 1	300 Monroe, NW, City Hall Suite 660
Address Line 2	
City, State, Zip Code	Grand Rapids, MI 49503
Telephone	616.456.3883
Fax	616.456.3111
Email Address	edelong@grcity.us
Web Address where this Form is Posted	http://www.grcd.info

Amount Grantee is Eligible to Receive*	\$1,650,890
Amount Grantee is Requesting	\$1,650,890

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

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B. Citizen Participation and Public Comment

1. Briefly describe how the grantee followed its citizen participation plan regarding this proposed substantial amendment (limit 250 words).

Response: Substantial Plan amendments are reviewed by the City Commission and are subject to public notice and comment. Notice of opportunity to comment on the HPRP amendment was advertised in the Grand Rapids Press (a newspaper of general circulation) on April 20, 2009, ten days prior to commencement of the comment period. The amendment was available for review from April 30 through May 11, 2009 in the Community Development Department and online at www.grcd.info. Written comments could be provided and were accepted via email to communitydev@grcity.us.

Grand Rapids Community Development Department staff worked with the local Housing Continuum of Care staff to align use of HPRP funds with the community's *Vision to End Homelessness* 10-year plan. Intended use of funds was presented at the Housing Continuum of Care general membership meeting on April 23, 2009, where 80 people attended.

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: NA

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.

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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: Direct allocation to the Grand Rapids/Wyoming/Kent County Housing Continuum of Care through The Salvation Army Booth Family Services)

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

Response: HPRP funds will support the Coordinated Community Response Model developed by the Continuum of Care, known locally as the Grand Rapids Area Coalition to End Homelessness (Coalition). This model, further described in Attachment A, depends on a centralized intake process where households experiencing a housing crisis are assessed to determine their level of risk for homelessness and to develop a Housing Action Plan intended to facilitate resolution of the crisis. Funds will be directly allocated to The Salvation Army Booth Family Services, designated as the lead agency for central intake through its Housing Assessment Program (HAP) that began in February 2009. Additionally, Booth Family Services is the Employer of Record for Coalition staff.

Housing Resource Specialist (HRSs) staff from multiple agencies will provide support services and financial assistance to help households in resolving their housing crisis. The HRSs will have access to a “pool” of HPRP financial assistance funds held by central intake. The Coalition will facilitate an application process to hire additional Housing Resource Specialists with HPRP funds that will be trained and certified by Community Rebuilders and employed by applicant agencies.

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: The City of Grand Rapids will enter into a contractual agreement with The Salvation Army Booth Family Services as the lead agency. The agreement will outline specific uses for HPRP funds, reporting requirements, and special conditions as appropriate. The City Commission will approve execution of such agreement and authorize the Mayor to sign on behalf of the City. The City Attorney will review and approve the agreement prior to execution.

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The lead agency may contract with sub-grantees to meet HPRP objectives. In such cases, a Memorandum of Understanding will be used to identify roles and responsibilities, coordination of services, and specific program and reporting requirements. Entities must meet the following eligibility requirements:

- Actively involved with the Continuum of Care planning process, and approved by the Coalition;
 - Experienced in homeless services provision;
 - Experienced with HMIS data collection, and have an executed HMIS Participation Agreement with the Coalition and each of the agencies participating in the local HMIS system;
 - Demonstrate financial and administrative capacity to administer funds through an audit, and an oversight and management plan;
 - Commitment to the Coordinated Community Response Model.
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 Community Development Department (CDD) will be responsible for monitoring performance and timely use of HPRP funds. Internal fiscal controls are in place and generate accounting system reports that are regularly reviewed by CDD staff. These reports identify the dollar amount allocated for each federal grant-funded activity, the amount obligated, and the amount expended. Timeliness of expenditures is monitored regularly to ensure compliance with HUD requirements. These controls will ensure expenditure of at least 60 percent of HPRP funds within two years of the date HUD signs the grant agreement and all funds are expended within three years of this date.

CDD staff will review all expenditures for eligibility and adequate source documentation. All expenditures of federal funds, once approved by CDD, are sent to the City's Comptroller's Office for processing and further oversight. A single audit of the City's federal grants is performed annually by an independent auditor.

CDD will monitor Subgrantee projects using HPRP funds. Subgrantees will be certified annually to include review of the agency audit (if required), articles of incorporation, bylaws, and tax and insurance certifications. Written agreements will be established outlining specific federal and local requirements based on program regulations and guidelines.

CDD staff will conduct periodic reviews of Subgrantee agreement files. Upon such review, a determination will be made whether an expanded monitoring review is necessary. If it is determined necessary, CDD staff shall conduct a review. Results will be provided in writing to the Subgrantee within 30 days. The monitoring

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review letter will outline concerns and/or findings resulting from the review, and recommendations and/or corrective actions to resolve these issues, along with a timeframe for addressing them. If no findings or concerns are noted, the Subgrantee will receive a letter stating so.

If concerns and/or findings are identified, the Subgrantee must submit a written response within four weeks of receipt of the monitoring review letter. CDD staff will work with the Subgrantee until all issues are resolved.

Regular communication will occur with Coalition staff to ensure the system is working effectively and activities carried out by subgrantees are consistent with HUD's requirements and the Coordinated Community Response Model. The Coalition's Homeless Management Information Systems (HMIS) Administrator and Coordinator will oversee data tracking and evaluation using HMIS.

D. Collaboration

1. Briefly describe how the grantee plans to collaborate with the local agencies that can serve similar target populations, which received funds under the American Recovery and Reinvestment Act of 2009 from other Federal agencies, including the U.S. Departments of Education, Health and Human Services, Homeland Security, and Labor (limit 250 words).

Response: The City of Grand Rapids has an internal Stimulus Funds Tracking Team that meets regularly to coordinate City application for and use of American Recovery and Reinvestment Act funds. CDD staff meet with representatives of Kent County, the Department of Human Services, and other local agencies that will receive Recovery funds to determine opportunities for collaboration and effective service coordination. Additionally, a City staff person serves on the local FEMA advisory board that will allocate Recovery funds for the Emergency Food and Shelter Program (EFSP).

Although collaboration is intended, it is difficult at this time to determine exactly how this will occur. Many of the Recovery funds are not yet released, and agencies are awaiting notices to apply, regulations, and implementation guidance.

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: Consistent with our community's ten-year plan to end homelessness, HPRP funds will be used to directly support the Coordinated Community Response Model developed by the Coalition.

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Kent County Department of Human Services (DHS) is pursuing a partnership with central intake to dedicate one or more DHS staff person(s) to serve homeless or near homeless households exclusively. The goal is to expedite access to and exhaust mainstream resources before utilizing other resources, including HPRP funds.

Discussions are also taking place with area hospitals, the county jail facility and re-entry center, the Michigan Prisoner Re-Entry Initiative, foster care providers and community mental health, to ensure effective discharge planning and service coordination with central intake and community housing service providers. Where possible, collaborative agreements will be developed to solidify inter-agency/system partnerships.

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: As specified in the Consolidated Plan, the City of Grand Rapids participates in the community planning process for homeless services through the Coalition. The Coalition determines unmet needs, develops strategies, and recommends goals and activities, while providing guidance on funding priorities for federal, state, and City homelessness resources. Subsequently, HPRP funds will support the Coordinated Community Response Model designed by the Coalition to rapidly re-house homeless persons and prevent homelessness.

Housing Relocation and Stabilization funds will support hiring one full-time outreach position for the Coalition. This position will coordinate with central intake and StreetReach Program staff, create outreach and publicity materials, and develop communication tools to ensure awareness and access to HPRP and other community resources.

Funds also will support hiring two Housing Resource Specialists (HRSs) responsible for developing individualized plans focused on housing stability and rapidly returning homeless persons to permanent housing, while coordinating with mainstream services, to ensure housing stability. These positions will be housed at Coalition partner agencies.

Financial Assistance funds will be awarded to The Salvation Army Booth Family Services, the central intake lead agency, to be available for HRSs to assist clients with short- and medium-term rental assistance, security deposits, utility deposits, utility payments, or moving cost assistance. Eligibility of program participants receiving medium-term rental assistance will be evaluated and certified at least once every three months. Financial assistance payments will be made directly to

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third party providers. Units to be occupied by persons receiving rental assistance will be inspected for compliance with Habitability Standards.

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	\$581,998	\$581,998	\$1,163,996
Housing Relocation and Stabilization Services ²	\$145,125	\$145,125	\$ 290,250
Subtotal (add previous two rows)	\$727,123	\$727,123	\$1,454,246

Data Collection and Evaluation ³	\$ 114,100
Administration (up to 5% of allocation)	\$ 82,544
Total HPRP Amount Budgeted⁴	\$1,650,890

¹Financial assistance includes the following activities as detailed in the HPRP Notice: short-term rental assistance, medium-term rental assistance, security deposits, utility deposits, utility payments, moving cost assistance, and motel or hotel vouchers.

²Housing relocation and stabilization services include the following activities as detailed in the HPRP Notice: case management, outreach, housing search and placement, legal services, mediation, and credit repair.

³Data collection and evaluation includes costs associated with operating HUD-approved homeless management information systems for purposes of collecting unduplicated counts of homeless persons and analyzing patterns of use of HPRP funds.

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

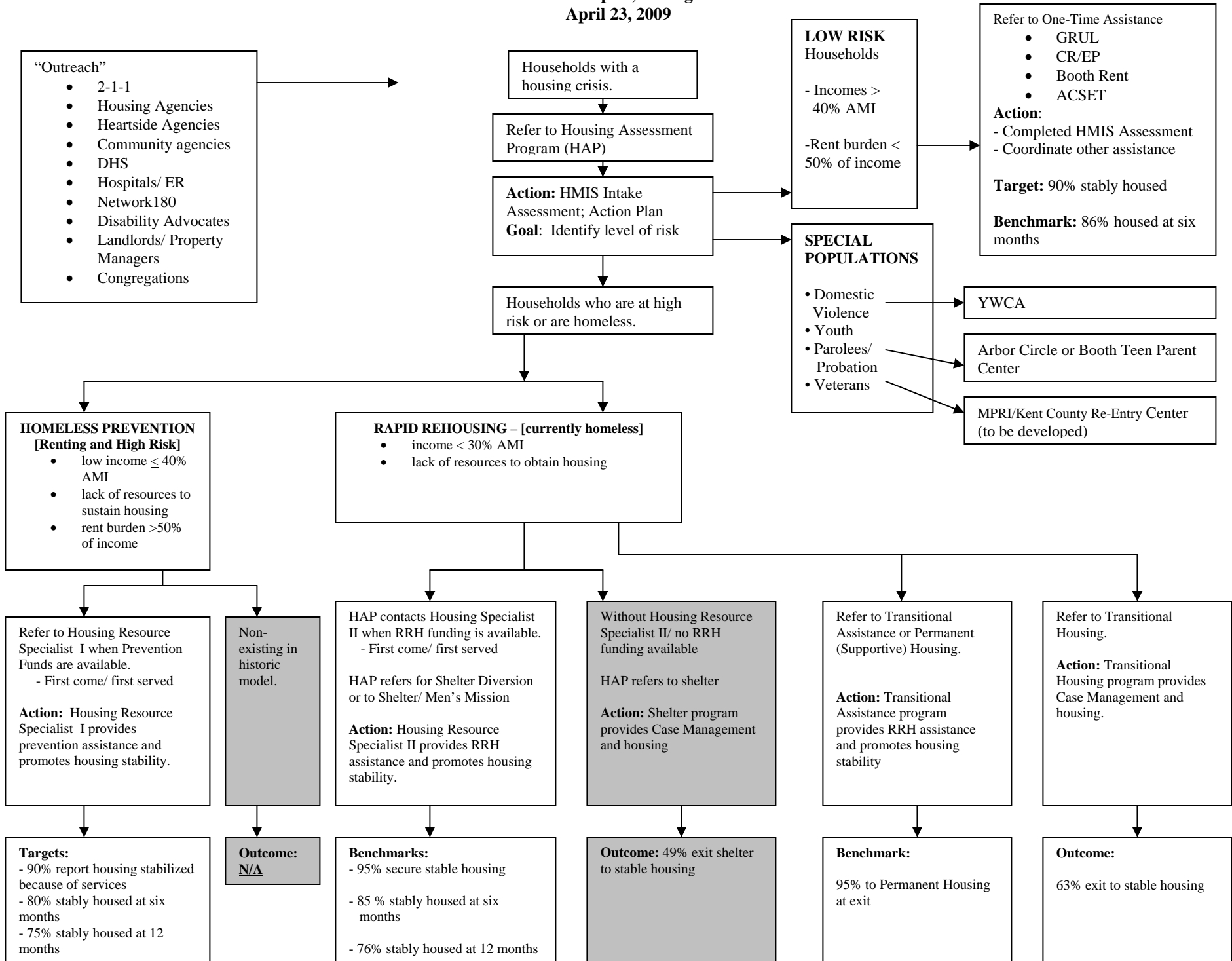
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F. Authorized Signature

By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete, and accurate to the best of my knowledge. I also provide the required assurances and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)

Signature/Authorized Official	Date
<u>Interim City Manager</u>	
Title	

Coordinated Community Response Model
Grand Rapids, Michigan
April 23, 2009



Key

Targets: No current data; what we hope to achieve.

Benchmarks: Top performance measurement.

Outcomes: Combined community measurement data from HMIS.

Benchmark Programs: **Rapid Rehousing** = Community Rebuilders GAP/ RISE
Transitional Assistance = Community Rebuilders Project Fit
Low Risk = Booth Housing Resolutions