

## **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>	Unified Government of Athens-Clarke County
<b>Name of Entity or Department Administering Funds</b>	Department of Human and Economic Development
<b>HPRP Contact Person</b> (person to answer questions about this amendment and HPRP)	William McNeely
<b>Title</b>	Director
<b>Address Line 1</b>	375 Satula Avenue
<b>Address Line 2</b>	
<b>City, State, Zip Code</b>	Athens, GA 30601
<b>Telephone</b>	706-613-3155
<b>Fax</b>	706-613-3158
<b>Email Address</b>	<a href="mailto:kmcneely@co.clarke.ga.us">kmcneely@co.clarke.ga.us</a>
<b>Authorized Official</b> (if different from Contact Person)	Heidi Davison
<b>Title</b>	Mayor
<b>Address Line 1</b>	P.O. Box 1868
<b>Address Line 2</b>	
<b>City, State, Zip Code</b>	Athens, GA 30601
<b>Telephone</b>	706-613-3010
<b>Fax</b>	706-613-3033
<b>Email Address</b>	<a href="mailto:hdavison@co.clarke.ga.us">hdavison@co.clarke.ga.us</a>
<b>Web Address where this Form is Posted</b>	<a href="http://www.athensclarkecounty.com/~hed/">http://www.athensclarkecounty.com/~hed/</a>

<b>Amount Grantee is Eligible to Receive*</b>	<b>\$604,969</b>
<b>Amount Grantee is Requesting</b>	<b>\$604,969</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).

**Response:** Athens-Clarke County Human & Economic Development published a Notice of Substantial Amendment to the July 1, 2008-July 30, 2009 Annual Action Plan of the Five Year Consolidated Plan in the Athens Banner Herald as a block ad in the non-legal section on April 19, 2009. The notice included the time, date, location, amount of funding, and the topic to be discussed at the public hearing. The notice identified the April 23, 2009 Athens-Clarke County Mayor and Commission meeting as the Public Hearing to solicit and discuss public comments on the proposed uses of the ARRA funds for Community Development and Homeless Prevention and Rapid Re-Housing activities. The notice called for 13 days of Citizens comments from April 19<sup>th</sup> to May 1<sup>st</sup>, 2009. ACC Citizen Participation Plan allows 10 days prior to implementation of the amendment for citizen comments. The notice identified how citizens could provide comments in writing, e-mail, facsimile, or via telephone. The notice also explained that the Athens-Clarke County Mayor and Commission would vote on the uses of ARRA funds at their May 5, 2009 meeting.

The proposed use of ARRA funds was available for public review and comment on the HED web site, at the HED main office, at the Mayor's Office, the Manager's Office, the Regional Library, the Athens Housing Authority, the Northeast Georgia Regional Development Center, the East Athens Development Corporation, and the Hancock Community Development Corporation office.

A copy of the Notice of Substantial Amendment is enclosed.

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:**

There were no comments offered at the public hearing on April 23, 2009.

There were no comments offered at the meeting on May 5, 2009.

There were no written comments received via telephone, facsimile, or e-mail.

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### **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: Open Consultation and Discussions with local CoC and Local Officials)

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

Response:

The goal of this implementation is to develop sufficient partnerships that will lead to significant coverage of these funds across the Athens-Clarke County CoC. Discussions took place among HED staff, members of the Athens-Clarke County CoC and the Mayor and Commission regarding the proposed allocation of HPRP funds. During these discussions, it was determined that allocating 100 percent of the funds to one agency would not benefit the entire local homeless and at-risk population. Nonprofit service providers in Athens are small and ACC's varied homeless service providers serve specific, targeted populations.

Using the criteria set forth in the HUD notice as a guide, ACC officials established the following criteria for subgrantees to qualify for this program.

- All subgrantees must be actively participating in the Homeless Management Information System
- All subgrantees must be active members of the Northeast Georgia Homeless Coalition
- All subgrantees must have an extensive documented track record of collaboration with other homeless service providers within the Athens-Clarke County CoC.
- All subgrantees must be able to show adequate capacity to carry out the eligible activities under this program.

Using this criteria, four local service providers were identified by the CoC and local elected officials as the most viable candidates to successfully implement this program. Three of the four recommended agencies are experienced in providing

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housing and case management services to specific special needs populations. The fourth member agency will provide HPRP services to all other homeless persons who do not fit into any special needs categories.

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:

Athens Clarke County plans to submit this Substantial Amendment to HUD by May 18, 2009. Once ACC submits the Substantial Amendment to HUD for review, HED staff will immediately schedule the first of the quarterly work sessions among the four HPRP subgrantees. Upon HUD review and approval of ACC's substantial amendment in July, HED staff will begin the process of contracting with the subgrantees. Each subgrantee will get a one-year renewable contract to provide HPRP services. Subgrantee contract scopes of services will be due to HED July. Grant Agreements from HUD will be executed by September 1, 2009. Contracts with subgrantees will be signed and executed before September 30, 2009. ACC will obligate HPRP grant funds to subgrantees on 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 subgrantees (limit 500 words).

Response:

The Homeless Prevention and Rapid Re-Housing Program is a three year program. Subgrantees will execute annual contracts that include an authorized amount of funding for the provision of HPRP services to the homeless and at-risk population.

The ACC Department of Human and Economic Development will be serving as the grantee for these funds and, therefore, be the responsible entity for the administration of these funds to local subgrantees. ACC HED currently administers CDBG, SHP, and HOME funds to over 25 local non-profit organizations within Athens Clarke County. Moreover, HED has experience in administering funds for programs with features similar to HPRP. Ongoing administration and monitoring of this program will be as such:

HED staff's oversight of this program will begin with extensive attention to program planning and development. Technical assistance will be provided, partnerships will be facilitated, and details of program design will be reflected in implementation plans. Contracts will have specific requirements for program implementation and outcomes meeting the terms of HPRP. HED staff will monitor all subgrantees within 30 days of obligation of funds and no less than 45 thereafter. All subgrantees will submit monthly reports to HED that will be consolidated to meet HUD's quarterly reporting requirement for HPRP. Funds will be recaptured

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from underperforming subgrantees and reallocated to existing and eligible subgrantees in the Athens-Clarke County CoC.

Each subgrantee will contract with HED on an annual basis to provide these services. Budget amendments are made as the quarterly reviews may indicate need for adjustments as the year progresses. During each annual contract renewal, the budget amounts will be amended depending on the rate of expenditure and the level of performance of each agency. The purpose of the quarterly review sessions is to review program expenditures and performance and identify opportunities for budget amendments. HED staff will facilitate the quarterly review of the four agencies through desk monitoring of budgets and performance reports and on-site visits.

Quarterly review periods will occur during which the rate of expenditures will be reviewed and the levels of need of the various populations will be assessed. This collaborative approach among these four agencies will ensure that the funds are expended efficiently and that they will reach the populations for which they are best suited.

The collaborative approach and active oversight of the program will provide an opportunity for all of those who are homeless or who are at risk of being homeless to be served. Homeless service providers who are not direct subgrantees of Homeless Prevention and Rapid Re-Housing Program funds will be encouraged to refer their clients to one of the four subgrantees to determine eligibility and receive direct assistance. In addition, this approach promotes a collaborative model, which will encourage communication and participation among all of ACC's local homeless service providers. Lastly, by having the funds divided among four agencies, ACC is encouraging a comprehensive approach that will remain effective even if one or even two agencies have slow expenditures of funds or low performance levels.

### **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).

In accordance with the Athens-Clarke County Consolidated Plan and Continuum of Care strategies, Athens-Clarke County will require HPRP subgrantees to refer clients to all appropriate mainstream resources such as Food Stamps, Medicaid, and TANF. Subgrantees working with clients with mental health, substance abuse, developmental disability, or HIV/AIDS diagnosis will assist clients in receiving Social Security Disability Income (SSDI) and the Substance Abuse and Mental

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Health Services Administration Project for Assistance in Transition from Homelessness (SAMHSA PATH) program. Clients who are able to work will receive assistance from Department of Labor and local employment assistance programs.

In addition to mandatory referrals, many mainstream resources are already connected to the local Continuum of Care. The Clarke County School District Homeless Education Program will identify potential families to refer to HPRP resources for assistance.

As the HPRP grantee, Athens-Clarke County will provide ongoing technical assistance and monitor subgrantees to ensure that they are referring their clients to all appropriate mainstream resources.

2. Briefly describe how the grantee plans to collaborate with appropriate Continuum(s) of Care and mainstream resources regarding HPRP activities (limit 250 words).

Athens Clarke County is requiring HPRP subgrantees to be members of the Northeast Georgia Homeless Coalition (NEGAHC), the lead Continuum of Care agency. The NEGAHC includes agencies that work to: prevent homelessness through CSBG and other financial assistance; provide shelter and services to the homeless through SHP and CDBG funds; provide mainstream resources such as those provided by the Department of Labor, Social Security, HHS and others; and place homeless into mainstream housing or subsidized housing such as S+C, PHA housing, or apartments built with CDBG and tax credits.

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).

The HPRP program meets several goals in the Athens-Clarke County Consolidated Plan including:

- (A) Affordable Housing Strategy 6: Provide decent, safe, and accessible affordable housing opportunities for low-to-moderate income residents particularly in neighborhood revitalization areas by providing emergency shelter, transitional-housing, and related housing assistance for homeless people and families; and
- (B) Public Services Goal 3, Strategies 1,2 and 3: Reduce homelessness in Athens-Clarke County by (1) helping the homeless find and retain permanent housing through intensive case management and follow-up, (2) providing financial assistance, job training, education, and employment-supportive services, and (3) providing support services for homeless people.

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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>	\$ 151,242	\$ 151,242	\$ 302,484
Housing Relocation and Stabilization Services <sup>2</sup>	\$ 135,368	\$ 135,368	\$ 270,736
<b>Subtotal</b> (add previous two rows)	<b>\$ 286,610</b>	<b>\$ 286,610</b>	<b>\$ 573,220</b>
Data Collection and Evaluation <sup>3</sup>			\$ 1,500
Administration (up to 5% of allocation)			\$ 30,249
<b>Total HPRP Amount Budgeted<sup>4</sup></b>			<b>\$ 604,969</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)

\_\_\_\_\_  
Signature/Authorized Official

\_\_\_\_\_  
Date

Mayor Heidi Davison  
\_\_\_\_\_  
Title