OMB Approval Number: 2506-0180 (Expiration Date: 9/30/2009)

# 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 (<a href="www.hudhre.info">www.hudhre.info</a>). 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)

### A. General Information

<b>Grantee Name</b>	Franklin County, Ohio
Name of Entity or Department Administering Funds	Franklin County, Ohio
HPRP Contact Person	Mark Paxson
(person to answer questions about this amendment and HPRP)	
Title	Sr. Program Coordinator
Address Line 1	150 S. Front Street, Suite 10
Address Line 2	
City, State, Zip Code	Columbus, Ohio 43215
Telephone	614-462-5578
Fax	614-462-4876
Email Address	mspaxson@franklincountyohio.gov
Authorized Official (if different from Contact Person)	Paula Brooks
Title	President of Board of Commissioners
Address Line 1	373 S. High Street, 26 <sup>th</sup> Floor
Address Line 2	
City, State, Zip Code	Columbus, Ohio 43215
Telephone	614-462-5729
Fax	614-462-5999
Email Address	pbrooks@franklincountyohio.gov
Web Address where this Form is Posted	www.franklincountyohio.gov/commissioners/community_development.cfm

Amount Grantee is Eligible to Receive*	\$746,920.00	
<b>Amount Grantee is Requesting</b>	\$746,920.00	

<sup>\*</sup>Amounts are available at <a href="http://www.hud.gov/recovery/homelesspreventrecov.xls">http://www.hud.gov/recovery/homelesspreventrecov.xls</a>

#### **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).

Per the County's Citizen Participation Plan, the public was apprised of the proposed substantial amendment per a public notice in the Columbus Dispatch on Sunday, April 26th, 2009 and the placement of the amendment on the County's website at:

www.franklincountyohio.gov/commissioners/community\_development.cfm on Friday, April 24th, 2009. Further, citizens were invited to comment on the substantial amendment at the May 7<sup>th</sup>, Commission briefing or by contacting the County via e-mail or by telephone. In addition to the copies that were made available by the internet they were also made available by contacting the County's Department of Economic Development & Planning. Additionally, the substantial amendment was discussed by community homelessness representatives and private citizens at the County's April 7<sup>th</sup>, 2009 2010-2014 Consolidated Plan Homelessness focus group.

In addition to providing citizens the opportunity to participate in the creation of the substantial amendment and to encourage that participation, the County:

- o Provides timely responses to proposals and comments submitted
- Provides complete information regarding the County's federal entitlement programs, relevant legislation and regulations, other materials and documents as needed or requested to ensure a knowledgeable citizen involvement
- o Provides technical assistance and information
- o Sponsors County public and performance hearings
- Maintains a Community Development Advisory Board (CDAB) whose purpose is to advise and make recommendations to the Franklin County Board of Commissioners on policies and procedures related to the county's receipt and allocation of HUD entitlement funds.
- o Publishes an Annual Program Summary

acceptance.

2.	Provide the appropriate response regarding this substantial amendment by checking one of the following options:
	<ul> <li>☐ Grantee did not receive public comments.</li> <li>☐ Grantee received and accepted all public comments.</li> <li>☐ Grantee received public comments and did not accept one or more of the comments</li> </ul>
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-

#### 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

2. Briefly describe the process (es) indicated in question 1 above (limit 250 words). The City of Columbus and Franklin County are collaborating to fund HPRP initiatives that benefit the city and county. We have agreed to combine our allocations and work through the Rebuilding Lives Funder Collaborative (RLFC) and Community Shelter Board (CSB).

The Community Shelter Board was created in 1986 of respond to the growing problem of homelessness in Franklin County. The Board's founders were the City of Columbus, the Franklin County Board of Commissioners, the United Way of Central Ohio, The Columbus Foundation, the Greater Columbus Chamber of Commerce and many other organizations concerned about the quality of life in Central Ohio. CSB is a non-profit intermediary organization that innovates solutions, creates collaborations, and invests in quality programs in order to end homelessness in Columbus and Franklin County. See www.csb.org.

Franklin County establishes contracts and subrecipient agreements with CSB for administering County funds to eligible and qualified nonprofit service providers of homelessness prevention, emergency shelter, and supportive services for permanent supportive housing. Sources of County grant funds include Federal Emergency Shelter Grant, Community Development Block Grant funds, and County general funds.

CSB staffs both the City/County Continuum of Care Committee and the RLFC. The RLFC is a collaborative of local funders (city, county, public housing authority, philanthropic, etc.) committed to implementing the <u>Rebuilding Lives Plan</u> which calls for making emergency shelter available for all those in crisis and developing permanent housing linked to services for those with long-term needs.

http://csb.org/files/docs/publications/2008/Community%20Summary%20(final).pdf

Franklin County will award a subrecipient agreement to the Community Shelter Board in collaboration with the City of Columbus.

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).

After HUD approval in July, the County will prepare legislation and the subrecipient agreement with Community Shelter Board (CSB). Legislation will be scheduled for the County Board of Commissioners by July 28, 2009. Commission approval authorizes the Department of Development to enter into a subrecipient agreement with the CSB.

CSB will then award subgrantees selected through a Competitive Request for Proposals (RFP) process called CSB Gateway - a new, streamlined process for establishing partnership agreements developed by CSB. CSB has identified and eliminated redundant and burdensome processes. This new effort leverages available technology through CSB's website (see link <a href="http://www.csb.org/?id=resources.money">http://www.csb.org/?id=resources.money</a>). The updated application and comprehensive contracting process include all programs that receive CSB funding, adhere to RLFC requirements, and work for the local Continuum of Care funding process. Agencies will submit grant proposals via the CSB Gateway for HPRP grant funds in July/August 2009 in order to have partnership agreements in place by September 30<sup>th</sup>. CSB will coordinate a Proposals Review Team.

CSB is staffing the current planning process for the HPRP. Four Collaborative Planning Teams are planning HPRP initiatives and designing the RFPs for agencies to submit proposals. The teams include:

- 1. Coordinate Emergency Aid to Prevent Homelessness United Way of Central Ohio/Franklin County Department of Jobs and Family Services
- 2. Adult System Improvement– Adult System Operations Work Group
- 3. Family System Improvement– Family System Operations Work
- 4. Homelessness Prevention for Persons with Mental Illness Alcohol, Drug and Mental Health Board of Franklin County (ADAMH)
- 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).

Franklin County staff in the Department of Economic Development & Planning will work with the Community Shelter Board to ensure that all HPRP initiatives comply with programmatic and regulatory guidelines.

Franklin County grants management staff will assist in the administration of the Homelessness Prevention and Rapid Re-housing Program in a variety of financial and regulatory areas. Activities will include financial management, program monitoring, technical assistance, regulatory compliance, Integrated Disbursement and Information System (IDIS), eligibility issues and the preparation of required federal reports. Further, County grants management staff is also responsible for the oversight and management of the subrecipient contracts that fall under their purview, as well as the County's own internal programs and initiatives.

Franklin County grants management, finance and management & budget staff will review and monitor County HPRP contracts and programs for compliance with HUD and County regulations. Franklin County Staff will also provide technical assistance as necessary to ensure that monitoring compliance, including monitoring reviews that consist of:

- Ensuring programs and agencies are complying with fiscal and programmatic scopes of service:
- Conducting on-site visits to programs and agencies that receive HPRP funds;
- Ensuring that each program and agency is spending public funds in a prudent manner; and
- Providing advice on ways to secure superior services at minimum cost to the taxpayer.

CSB has been administering funds to end homelessness in Columbus and Franklin County since 1986. Recently, CSB streamlined the application process, which will allow for quick and timely contracting for services and program implementation. CSB oversees effective use of funds through monthly and semi-annual reporting requirements. In addition, partner agencies are monitored through a program review and certification process that requires all agencies to adhere to a full slate of standards. The standards include compliance requirements mandated by funders as well as standards important to maintain client service, programmatic quality and health and safety standards.

CSB also manages the homeless management information system (HMIS) named Columbus ServicePoint. HMIS was implemented to collect, monitor, and evaluate homeless and housing services in Columbus and Franklin County. Currently, 138 users in 17 agencies are using HMIS to collect data for 48 homeless and housing related programs throughout Franklin County. Besides administering the HMIS for Columbus and Franklin County, CSB provides extensive HMIS related technical assistance for all agencies:

- Quarterly quality assurance checks
- HMIS administrator's trainings
- HMIS user trainings
- Agency trainings on HMIS HUD and locally required standards
- Need-based one-on-one technical assistance

#### **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).

The County, RLFC and CSB established the following teams that will foster access to funding streams coming through ARRA.

#### a. Increase Access to Emergency Assistance, Benefits and Income

Provide immediate, systematic access to mainstream benefits and emergency assistance for persons who are homeless or at risk of homelessness. These persons benefit from stronger

linkage to mainstream benefits and systems of care (Social Security, Medicaid, Veterans benefits, TANF, Food Stamps, and Disability Assistance).

**Teams**: United Way of Central Ohio, Franklin County Department of Jobs and Family Services, Emergency Food & Shelter Board, FirstLink (211 Helpline), Mid-Ohio Foodbank, Impact Community Action, Social Security Administration, Veterans Services Commission, ADAMH Board, Legal Aid Society, Mental Health Association, NAMI, COHHIO, State Benefits Bank Director, Columbus Coalition for the Homeless.

#### b. Increase availability of community resources to prevent homelessness.

Coordinate and expand community-based employment assistance and education programs. Jobs and jobs with supportive services are key pivotal to preventing and eliminating homelessness.

**Team:** Franklin County Department of Jobs and Family Services, Bureau of Vocational Rehabilitation, ADAMH, Central Ohio Workforce Investment Corporation, Goodwill, mental health providers, Columbus Chamber of Commerce, Columbus State Community College, school boards, Labor unions

#### c. Increase the supply of affordable rental housing.

The County is investing Neighborhood Stabilization Program and HOME funds in projects that will increase both the supply of rental housing affordable to low income persons and permanent supportive housing for people who are currently homeless.

**Team:** Franklin County, City of Columbus, local nonprofit developers, Continuum of Care, Rebuilding Lives Funder Collaborative

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

The Rebuilding Lives Funder Collaborative (RLFC), the Continuum of Care (COC) Committee and Community Shelter Board work in tandem on permanent supportive housing development in Columbus and Franklin County. Franklin County has representatives participating on both the RLFC and COC committees. Developing and maintaining housing that is affordable to low income persons is key to preventing and ending homelessness. The County and CSB will ensure that the COC committee and the following priorities are integrated into the HPRP initiatives:

- **a.** Collaboration with and accessing resources from community-wide service systems appropriate to the consumer population.
- **b.** Collaboration with other parts of the continuum of care system, with particular emphasis on:
  - Systematic linkage, advocacy and coordination among service providers,
  - Avoiding duplication of existing community services and programs
- **c.** Reasonable costs to the community for the number of persons served and the type of housing and services being provided, with particular emphasis on:
  - Maximizing the use of continuum of care resources currently in the community.

- Leveraging public, private and non-profit sector community resources
- **d.** Providing housing and services for those with the greatest needs and greatest difficulty accessing the current homeless service system, with particular emphasis on:
  - Persons with special needs: mental health problems, substance abuse problems, HIV/AIDS, physical disabilities, veterans, elderly, and large families.
- **e.** Formulating individualized service delivery approaches that follow customers through the continuum of care.
- f. Providing services designed to enable persons to successfully maintain permanent housing.
- 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 2005-2009 Columbus and Franklin County Consolidated Plan (Plan) builds upon several principles relevant to HPRP. The Franklin County will apply these Plan principles to its implementation of HPRP initiatives:

- **Priority to Lowest Income**. Ensure that no one is left behind, especially the poorest in our community.
- **Collaboration**. Encourage public, private and non-profit sector collaboration and reduce program duplication.
- Leverage. Leverage the involvement of private sector organizations and resources.
- Measurable Results. Produce and evaluate measurable outcomes and results.

The Plan identifies housing affordability as "the most significant housing problem in Columbus and Franklin County". The Plan states, "The greatest housing need is among the lowest income renter households". This leads to overcrowding and housing cost burdens greater than 30% of monthly income. These realities place individuals and families at risk of homelessness.

The HPRP provides resources to assist the County in meeting its Plan goals and objectives that address homelessness prevention and re-housing. HPRP helps achieve or complement Plan objectives:

- "Maintain a Continuum of Care system that includes Homelessness Prevention resources as well as assistance to help families and individuals move from emergency shelters to transitional housing or permanent affordable housing." (Table 55, Page 137)
- "Implement the Rebuilding Lives Initiative by funding non-profit organizations to develop
  and operate permanent housing for persons who have experienced long-term homelessness."
  (Table 55, Page 137). The County is investing Neighborhood Stabilization Program and
  HOME funds to expand the supply of affordable rental housing through tax credit
  developments.

#### **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 <sup>1</sup>		\$397,440	\$397,440	
Housing Relocation and Stabilization Services <sup>2</sup>		\$244,911	\$244,911	
Subtotal (add previous two rows)		\$642,351	\$642,351	
Data Collection and Evaluation <sup>3</sup>			\$67,223	
Administration (up to 5% of alloca	\$37,346			
Total HPRP Amount Budgeted <sup>4</sup>			\$746,920.00	

<sup>&</sup>lt;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 payments, moving cost assistance, and motel or hotel vouchers.

<sup>&</sup>lt;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>&</sup>lt;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>&</sup>lt;sup>4</sup>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 co (2) that the statements herein are true, complete, and accura provide the required assurances and agree to comply with a am aware that any false, fictitious, or fraudulent statements civil, or administrative penalties. (U.S. Code, Title 218, Sec	ate to the best of my knowledge. I also any resulting terms if I accept an award. I s or claims may subject me to criminal,
Signature/Authorized Official	Date
President, Franklin County Board of Commissioners Title	