

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)

A. General Information

Grantee Name	City of Detroit
Name of Entity or Department Administering Funds	Planning and Development Department
HPRP Contact Person (person to answer questions about this amendment and HPRP)	Constance Bell
Title	Executive Manager
Address Line 1	Suite 1400
Address Line 2	65 Cadillac Square
City, State, Zip Code	Detroit, MI 48226
Telephone	(313) 224-9224
Fax	(313) 224-2321
Email Address	BellC@detroitmi.gov
Authorized Department Official (if different from Contact Person)	Robert C. Davis, AICP
Title	Director, Planning and Development Department
Address Line 1	Suite 2300
Address Line 2	65 Cadillac Square
City, State, Zip Code	Detroit MI 48226
Telephone	(313) 224-2570
Fax	(313) 224-1629
Email Address	DavisR@detroitmi.gov
Web Address where this Form is Posted	www.detroitmi.gov

Amount Grantee is Eligible to Receive*	\$ 15,234,947
Amount Grantee is Requesting	\$ 15,234,947

*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 HPRP draft substantial amendment notice was published in the “Michigan Chronicle” on Wednesday, April 29, 2009. The notice invited Detroit citizens to review and comment on the draft substantial amendment. The official public comment period on the draft substantial amendment began on April 29 and will last until May 11, 2009. The announcement of the draft substantial amendment for HPRP included contact information, the e-mail address HPRP@detroitmi.gov available for citizen comments, as well as notice of the abbreviated twelve (12) day required public comment period.

The substantial amendment was made available to the public on the City of Detroit’s website beginning on April 29, 2009. It was also made available for review in the offices of the City of Detroit Planning and Development Department and the City of Detroit Neighborhood City Hall offices. To ensure HPRP serves Detroit residents at risk of becoming homeless, the Planning and Development Department consulted with homeless service providers experienced in homeless prevention and/or services to this population.

A notice of three community forums to inform the public about the HPRP grant and the availability of funding was published in the “Michigan Chronicle” on Wednesday, April 15, 2009. The notice was distributed to community organizations and posted in public areas. The first community forum was held on April 21, 2009 with service providers that currently service the homeless population. Additional forums for citizen input were held on April 27 and April 30, 2009.

- 2. Provide the appropriate response regarding this substantial amendment by checking one of the following options:**

To be completed following comment period

- 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:

To be completed following the comment period

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:

Given the accelerated time frame for securing contractual agreements, the City anticipates publishing a formal Notice of Funding Availability (NOFA), and Request for Qualifications (RFQ) in May 2009.

The City will utilize an open competitive procurement process in order to provide a fair and transparent process to select the most experienced, knowledgeable Homeless Service Providers who are capable of quickly implementing various eligible activities and tasks under the Homeless Prevention & Rapid Re-Housing Program (HPRP). Sub-grantees must: (1) be a 501c(3) nonprofit organization, (2) exhibit the financial capacity to administer funds as demonstrated through an audited financial statement, (3) demonstrate financial capacity to administer significant amounts of funds within a relatively short time frame, (4) operate its principle place of business in the City of Detroit; (5) demonstrate at least five (5) years of experience in providing services specifically targeted for people who are homeless or at risk of becoming homeless, and (6) be prepared to comply with the HMIS reporting requirements.

Upon receipt of the responses, the City will convene an evaluation team to review and select the best proposals, from the most qualified service providers. HAND will have an advisory role, providing technical assistance via the Continuum of Care, throughout the entire three-year HPRP program.

The City of Detroit will select sub-grantees that can implement the proposed HPRP strategy in the most effective and expedited manner by contracting with agencies that currently offer homeless prevention services similar to eligible activities under the HPRP.

- 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:

One of the overarching management goals for the City of Detroit in the HPRP program, is to develop and implement processes that will assure the timely delivery of third-party funding assistance for program clients to quickly ascertain and connect with much-needed services.

Prior to HUD approving the grant agreement, the Planning and Development Department will work with Law Department staff to develop performance based contract language ensuring all federal HPRP requirements are cited. Contracts will also align with the NOFA and Request for Qualifications (RFQ) specifications. "Performance Based" contracts will be developed for each selected Homeless Service Provider, which will be executed with an effective October 1, 2009 date. Contract "Scopes of Service" will detail client services, costs, accomplishment timeframes, number of clients served, and quarterly reporting requirements. Two (2) year contract periods will be standard. A maximum 12-month extension will be available based on performance. Advance payments (up to fifteen percent of the total contract) will also be allowed.

To assure that service providers have the ability to immediately serve program participants, and that the City complies with program funding commitments, time lines and disbursement requirements, an expedited and "special handling" procurement process has been developed. In addition, dedicated City staff has been identified to manage the contract and payment process for the subgrantees.

- 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 has developed an aggressive, comprehensive strategic planning effort, focused on a fast-track implementation for HPRP. The City has convened an overall HPRP task force, which includes the Detroit Department of Human Services, Detroit Workforce Development Department, Wayne County, State of Michigan, and the Detroit Continuum of Care (H.A.N.D.) to assist in the coordination and implementation of the program.

The City will convene an initial HPRP orientation session with all selected service providers, and thereafter convene quarterly sessions, that coincide with federal reporting requirements.

In accordance with the City of Detroit's approved Consolidated Plan, the Planning and Development Department (P&DD) has the primary responsibility for administering and monitoring HUD entitlement funds. The primary responsibility for monitoring the HPRP subgrants will be the staff of the Neighborhood Support Services Division (NSSD) of P&DD, along with support and resources from other P&DD Divisions.

To demonstrate that project goals are met and funds are expended as intended and in a timely fashion, NSSD will operate within the implementation guidelines set forth in the Notice for HPRP funding, which includes:

- ❑ Tracking important contract dates and implementation guidelines
- ❑ Tracking eligible activities, program participants and expenses
- ❑ Submitting IDIS draw downs for HPRP funds (monthly)
- ❑ Coordinating HPRP funds with other community planning efforts
- ❑ Collecting and reporting data required for quarterly and annual reports
- ❑ Maintaining grantee/sub-grantee records within the time frame required
- ❑ Monitoring the performance of HPRP activities
- ❑ Conducting periodic on site monitoring visits to verify participant and program performance information
- ❑ Implementing appropriate procedures for non-compliant agencies

The Financial and Resource Management Division's (FRMD) Performance Monitoring Section will conduct periodic on site monitoring to review subgrantee's financial management systems and verify payment information.

The FRMD's Grants Management Section will ensure HPRP activities are consistent with the Consolidated Plan, as well as review and analyze payments and performance information prior to submission into the HUD IDIS system.

There will be a close alignment with the City's NSP activities; specifically NSP funded housing projects to support HPRP rental housing needs.

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 Detroit will encourage all sub-grantees to collaborate as appropriate with other entities in the community that are also receiving Recovery Act funds. The City of Detroit recognizes collaboration is necessary to ensure communities receive maximum benefits from these funds. As a part of the implementation of the HPRP program, the City of Detroit will work with other City departments, the Homeless Action Network of Detroit (the Continuum of Care for the City of Detroit), and local service providers in the development of a centralized screening and intake process. This centralized system will help ensure individuals seeking assistance are referred to the agency with the best resources to meet that person's needs.

The HPRP funding is assisting the City of Detroit to achieve the goals outlined in the 10-Year Plan to End Homelessness, which is part of a larger statewide campaign to end homelessness. The State of Michigan has recently launched a statewide anti-poverty campaign, and has incorporated their existing campaign to end homelessness. At the local level, the City of Detroit will collaborate with the State's efforts to identify service delivery system improvements or enhancements to more effectively serve the community.

- 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:

Since the release of the announcement of HPRP funds on March 19, 2009 and prior to, the Planning and Development Department has been in conversation with other City departments and the local Continuum of Care regarding the planning and implementation of HPRP activities. The City of Detroit's Planning and Development Department and the Homeless Action Network of Detroit have agreed to work collaboratively in the development of the plan for the HPRP funds. The City of Detroit and the Continuum of Care are also working closely with the Michigan State Housing Development Authority to help ensure alignment of the local HPRP activities and the Statewide HPRP activities to ensure maximum outcomes for those intended to benefit from the programs.

The Continuum of Care for Detroit will provide to the City linkages to other mainstream resources. The City will work with the Continuum to facilitate further collaboration between all partners to help ensure the most effective implementation of HPRP activities.

- 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 use of HPRP funds will be aligned with the City of Detroit's Consolidated Plan. The goals, objectives and strategies within the 2005-2010 Consolidated plan are aimed at alleviating the housing and supportive services needs of many of the residents of Detroit, including those in poverty, at risk of becoming homeless or are homeless and those with special needs, including the elderly, disabled and persons with HIV/AIDS.

The activities funded by HPRP will help the City of Detroit achieve the following goals identified in the 2005-2010 Consolidated Plan:

GOAL: Expand housing opportunities affordable to extremely low and low-income persons

GOAL: Continue assistance to seniors to remain in their homes

GOAL: Provide supportive housing

GOAL: Increase coordination among various agencies

Homelessness Prevention activities will be provided to low-income individuals and families that are already in housing to assist them in staying housed. Homelessness prevention services include assistance with rental payments, assistance with utilities payment, assistance with illegal evictions, mediation of landlord/tenant disputes, availability of rental subsidies and expanded use of housing choice vouchers. Preventing homelessness for individuals and families with children or those at imminent risk of homelessness is a top priority of the Detroit Continuum of Care and the City of Detroit.

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 (28% Prevention & 30% Rapid Re-housing) = 58%	\$ 4,241,409.00	\$ 4,594,860.00	\$ 8,836,269.00
Housing Relocation and Stabilization Services ² (17% housing relocation & 18% stabilization)=35%	\$ 2,666,115.00	\$ 2,666,116.00	\$ 5,332,231.00
Subtotal (add previous two rows)	\$ 6,907,524.00	\$ 7,260,976	\$ 14,168,500.00

Data Collection and Evaluation ³	\$ 304,700.00
Administration (up to 5% of allocation)	\$ 761,747.00
Total HPRP Amount Budgeted⁴	\$ 15,234,947.00

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

Mayor City of Detroit

Title