

City of Raleigh, North Carolina
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)

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

A. General Information

Grantee Name	City of Raleigh
Name of Entity or Department Administering Funds	Community Development Department
HPRP Contact Person (person to answer questions about this amendment and HPRP)	Michele Grant
Title	Director
Address Line 1	Community Development Department
Address Line 2	PO Box 590
City, State, Zip Code	Raleigh, NC 27602
Telephone	(919) 996-4330
Fax	(919) 857-4359
Email Address	Michele.Grant@ci.raleigh.nc.us
Authorized Official (if different from Contact Person)	J. Russell Allen
Title	City Manager
Address Line 1	City of Raleigh
Address Line 2	PO Box 590
City, State, Zip Code	Raleigh, NC 27602
Telephone	(919) 996-3070
Fax	
Email Address	allenr@ci.raleigh.nc.us
Web Address where this Form is Posted	www.raleighnc.gov

Amount Grantee is Eligible to Receive*	\$991,091
Amount Grantee is Requesting	\$991,091

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

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

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 City of Raleigh followed its Citizen Participation Plan by calling a Public Meeting concerning the HPRP. The meeting notice was published in a local newspaper, delivered in hard copy to libraries and public facilities throughout the city, and sent via email to approximately 280 organizations, elected representatives and individuals who have asked to be informed of our meetings. The meeting notice was also placed on the city website.

The Community Development Department held the Public Meeting April 16, 2009 from 6:00 – 8:00 p.m. at the Chavis Community Center in Raleigh. Thirty-three people attended the meeting. Comments were received at two breakout sessions and again at the end of the meeting when the breakout comments were shared. All comments were recorded and compiled.

A thirty-day comment period ran from April 8, 2009 to May 7, 2009. The HPRP program was also presented to and accepted by the City Council as part of the April 7, 2009 Public Hearing for the Annual Action Plan.

Representatives of the City also met with the leadership of the Partnership to End and Prevent Homelessness (the combined Wake Continuum of Care and Raleigh/Wake 10 Year Plan to End Homelessness) and homeless service providers as part of a Wake County HPRP meeting held April 3, 2009.

The Substantial Amendment was accepted by the City Council May 5, 2009.

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:

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

Summary of Comments from April 16th HPRP Public Meeting

Rapid Re-Housing

- Leave all options for support available on a case by case basis
- Target more shallow assistance; shorter time period
- Be more flexible (for emergencies)
- Target families
- After first 3 months, then step down assistance in 3 month increments
- Outreach should be through case managers in Wake Co. using the current service model
- Plug into church resources to help these families
- Have fewer providers with capacity to handle larger sums
- Be very flexible
- Reducing subsidies based on increasing dollars
- Target all families
- Target 50% and below
- Target 40% and below
- Target 30% and below
- Use fewer agencies to provide these services
- Sustainability counseling should be included in services.
- Case Manager must maintain relationship with client and landlord
- Assisted households must be ready to be re-housed
- Partner with Wake Co.

Homeless Prevention

- High Risk Factor is job loss
- Target 30% AMI
- Landlords can make referrals or provide program information
- Use other mainstream services to find eligible families e.g. ESC
- Fair Housing is an issue here
- Qualified ex-offenders must be included
- Churches will support and help but they need to see light at the end of tunnel
- Target less than half of the money for this activity, monitor movement from shelters

Summary of Additional Comments received during Public Comment Period

- We received a detailed proposal including intake, reporting forms, and staffing recommendations from the Women's Center of Wake County.

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

- We received a recommendation from the Triangle United Way’s Regional Initiative Task Force They asked us to consider four comments:
 - Prioritize the investment in case management services,
 - Use existing infrastructures for distributing financial assistance,
 - Fund administrative support for implementing agencies.
 - Use specific risk factors to determine who is eligible for support and services.

Comments not accepted

- **AMI restrictions to 40% and 30% AMI households.** We will continue to leave AMI requirements at the 50% level as allowed in the regulations thus giving maximum flexibility for subgrantees to serve eligible households
- **Outreach by Wake County case managers.** We will expand outreach activities beyond Wake County case managers as we see a need to reach families who do not use county services but may be eligible. Subgrantees and the City will work jointly to provide marketing and community outreach along with county case managers.

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:

The City of Raleigh in conjunction with Wake County is preparing a joint Request for Proposals that we will release as soon as we have confirmation that HUD has approved out Substantial Amendments.

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

The City of Raleigh will use the accepted comments received in drafting their portion of the RFP and in contracting with successful subgrantees.

We will perform a joint city/county review of the proposals and include leadership from the Partnership to End and Prevent Homelessness, other nonprofit and Faith-Based homeless service agencies on the review panel.

The City will place organizations chosen to administer the HPRP under contract as soon as possible.

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 soon as HUD and the city sign the grant agreement, the City of Raleigh will release its joint RFP with a short response time and simple application procedure.

An expedited review process will be used to determine who will provide HPRP services and assistance in both Wake County and the City of Raleigh.

Upon notice of application approval from HUD, at the latest by July 2, 2009, the City of Raleigh will establish the needed account(s) for HPRP and set-up HPRP activities in IDIS as required.

Legal review and contracting with subgrantees will take place when the review process is complete and approved by the City Council.

“Urgent” contract routing can be used to expedite contracting requirements if necessary to meet the September 30, 2009 deadline. Encumbering Purchase Orders are required as part of the contracting process and will also be in place by the September 30, 2009 deadline.

The department assigned a Program Coordinator the task of timely completion of the above steps so all HUD deadline requirements can be met.

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:

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

The City of Raleigh will contract annually with the subgrantees for services and expenditures to cost one third of the total grant amount, which will not exceed \$330,363.67 per year. The City will monitor subgrantees performance on a monthly basis via desk reviews of billing and reporting requirements. The city will monitor performance against an expectation of one-twelfth drawdown per month. The City will perform an on site review at the end of the sixth month of the contract. The subgrantees will be required to have spent down fifty percent of their yearly award at the end of the sixth month. The City will renew contracts every twelve months for three years as long as the subgrantees demonstrate satisfactory performance.

Subgrantees will submit monthly requisitions, summary expense reports, expense documentation, and grant services reports for each prior month, no later than the fifth of the month. Summary expense reports will organize expenditures in accordance with their contracts and grant budget categories. The City will review each eligible expense submitted to verify eligibility and sufficiency of supporting documentation.

The City of Raleigh will use the reimbursement method for HPRP payments. The City reserves the authority to narrow the scope of eligible expenses in conformity with administrative practices applied to other homelessness prevention services provider subgrantees in Wake County and adjust requirements to include developing best practices in the areas of homeless prevention and rapid re-housing of households.

The city will monitor program files and agency sites semi-annually. City of Raleigh internal audit staff will review financial reports, independent external audits, expenditures, and other related files and practices annually. Written recommendations or requirements notices will be provided by the City to subgrantees if such action is appropriate.

The City of Raleigh will document, track, and report on City administrative costs in accordance with existing HUD standards for use of administrative grant funds.

The City will require subgrantees to enter participant data required in the CHIN HMIS and will work collaboratively with Wake County and the Partnership to End and Prevent Homelessness to report on goals and outcomes on a quarterly basis. The City, following transparency requirements, will make these reports available on our website.

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).

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

Response:

The City of Raleigh will work in partnership with Wake County to determine other ARRA funds awarded to the City and County that may assist HPRP eligible households.

The City Mangers Office has convened an ongoing grants management committee that collects information from across all city departments concerning grants requested, awarded, and available. Members of the Community Development Department sit on this committee.

Nonprofit and Faith-Based agencies receiving ARRA and other governmental funding awards share that information through the Partnership to End and Prevent Homelessness. A city representative regularly attends, passes information, and receives information at the partnership. The city representative is involved in decisions made by the organization. The major homeless service providers in the area belong to or attend meetings of the partnership.

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:

The Wake Continuum of Care and the City of Raleigh/Wake County 10 Year Plan to End Homelessness have leveraged their efforts by combining as the Partnership to End and Prevent Homelessness. The City of Raleigh Program Coordinator for the HPRP is an active member of the partnership. The City will make regular reports to the partnership at their regular meetings.

Members of the partnership leadership will be involved in the subgrantee review process and will have input at each year's contract renewal time. The City and its partners will focus and target HPRP programs using data required in the Continuum of Care NOFA application process and available through the CHIN HMIS.

The County's April 3, 2009 HPRP meeting and the City's April 16, 2009 HPRP meeting were well attended by partnership members and many comments were received and will be implemented in the RFP to be released. The city will continue this collaborative effort in the application review process and in the ongoing monitoring of the HPRP and other homeless services programs in the city and county.

The City expects current homeless services providers to successfully submit applications for the HPRP funds and add HPRP financial support and services to

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

their existing “tool box”. The City will emphasize integrating eligible families with other services and support in the RFP and will require integrated and mainstream service integration as part of HPRP contracts.

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 City of Raleigh’s Consolidated Plan lists its concerns in three priority groupings. Under the Housing discussion in the plan, the Consolidated Plan presents the following priorities:

PRIORITY ONE

- Very low-income renter households
- First time low- and moderate-income homebuyers
- Households needing significant rehabilitation assistance
- Special populations such as homeless persons, disabled persons, and the frail elderly

PRIORITY TWO

- Existing homeowners
- Other households with special needs
- Elderly new construction
- Persons needing moderate rehabilitation

PRIORITY THREE

- Support facilities and services to non-homeless facilities and individuals

The plan lists “Very low-income renter households” and “Special populations such as homeless persons, and the frail elderly” in its priority one section.

From the information we have received we anticipate most financial assistance provided by subgrantees will be directed to very low-income (50% AMI or less) households and homeless households.

The City anticipates most housing relocation and stabilization services provided by subgrantees will also be provided to very low-income or homeless households.

HPRP assistance easily fits into the Consolidated Plan priority populations.

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

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	\$201,191.47	\$373,641.31	\$574,832.78
Housing Relocation and Stabilization Services ²	\$173,440.93	\$173,440.93	\$346,881.86
Subtotal (add previous two rows)	\$374,632.40	\$547,082.24	\$921,714.64
Data Collection and Evaluation ³			\$19,821.81
Administration (up to 5% of allocation)			\$49,554.55
Total HPRP Amount Budgeted⁴			\$991,091.00

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.”

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

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

Title