

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	District of Columbia
Name of Entity or Department Administering Funds	District of Columbia Department of Housing and Community Development
HPRP Contact Person (person to answer questions about this amendment and HPRP)	Michelle Y. Christopher
Title	Housing Compliance Officer
Address Line 1	1800 Martin Luther King, Jr. Ave., SE
Address Line 2	
City, State, Zip Code	Washington, DC 20020
Telephone	(202) 442-7241
Fax	(202) 645-5884
Email Address	Michelle.christopher@dc.gov
Authorized Official (if different from Contact Person)	Leila Finucane Edmonds
Title	Director
Address Line 1	1800 Martin Luther King, Jr. Ave., SE
Address Line 2	
City, State, Zip Code	Washington, DC 20020
Telephone	(202) 442 - 7210
Fax	
Email Address	Leila.edmonds@dc.gov
Web Address where this Form is Posted	www.dhcd.dc.gov

Amount Grantee is Eligible to Receive*	\$7,489,476
Amount Grantee is Requesting	\$7,489,476

*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:

The D.C. Department of Housing and Community Development (DHCD) has followed its Citizen Participation Plan (CPP) through a vigorous effort to notify and engage the public, Continuum of Care stakeholders, and District agencies who serve the targeted population throughout the plan development process.

DHCD provided formal notice of a public hearing regarding the HPRP Substantial Amendment through advertisement in *The Washington Post* and *The DC Register* on April 17, 2009. DHCD released a draft HPRP Substantial Amendment on April 22, 2009, available on DHCD's website-www.dhcd.dc.gov- and in specified public locations, in advance of a public hearing held on April 29, 2009.

The public comment period opened on April 22, 2009, and remained open through May 6, 2009, with the public able to submit comments in person at the hearing, by email to HPRP@dc.gov, or by U.S. Mail throughout that period.

DHCD collaborated with the District's Department of Human Services (DHS) to provide additional written information about District's proposed HPRP program. DHCD reached out to the District of Columbia Continuum of Care stakeholders to solicit feedback on HPRP program design. DHCD, DHS and The Community Partnership for the Prevention of Homelessness conducted a Continuum of Care Stakeholder meeting on April 21, 2009. DHCD and DHS presented the proposed program design Stakeholder comments were recorded and duly considered.

On April 29, 2009, DHCD held a public hearing. 35 people were in attendance. 11 presented testimony.

Finally, District Agencies that serve the targeted population were involved in the development of the plan. DHCD worked in close collaboration with the Department of Human Services (DHS), and held stakeholder meetings attended by the following agencies: Department of Health, HIV/AIDS Administration; Office of Victim Services; Office of the Tenant Advocate; Child and Family Services Agency; Department of Mental Health; and the Office on Aging.

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

Grantee did not receive public comments.

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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.

On April 17, 2009 , DHCD published a “Solicitation of Public Comment” in District of Columbia Register, Volume 56, Number 17 (See DC Register Attachment). This notice informed the public that DHCD’s draft HPRP Substantial Amendment would be available on April 22, 2009, on DHCD’s website and gave contact information to request a printed copy. Additionally, it provided details of the April 29, 2009 public hearing, as well as details for submitting comments by email and by mail.

On April 22, 2009, DHCD posted the draft HPRP Substantial Amendment on its official website, www.dhcd.gov for public comment. On April 29, 2009, in a properly noticed Community Needs Hearing, DHCD accepted public comments on the HPRP Substantial Amendment.

Comments received through the website posting and the formal hearing are summarized below:

The District received a number of comments from organizations that serve populations who are particularly vulnerable to homelessness and are underserved by the District’s existing homeless prevention and re-housing programs. These organizations were looking to ensure that the program would serve youth, persons living with HIV/AIDS, Limited English Proficiency , homeless individuals, and married couples who are not accompanied by minor children. The observations and recommendations of these groups are consistent with the District’s HPRP program design. The District’s HPRP program is designed to proactively reach members of these groups who are at imminent risk of homelessness or are currently homeless.

The District will work with organizations that serve vulnerable populations (i.e. youth, victims of domestic violence, persons living with AIDS) to provide outreach and case management support to assist in accessing HPRP resources. HPRP is designed to serve two eligible populations: persons who are still housed but at risk of becoming homeless, and persons who are already homeless. Specific populations who are at risk of homelessness, including youth, persons with severe mental illness, persons living with HIV/AIDS, persons exiting institutions are subgroups of the two eligible populations. The District will appropriately target HPRP to these two populations with particular focus on reaching those populations that have been ineligible for the current array of programs and tailor support to address the specific housing need

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The District anticipates outreaching to the community by publicizing to community organizations and potential recipients that HPRP rental assistance will have broader eligibility criteria that will enable Prevention and Rapid Re-housing efforts that will be conducted by the District. The District will use a uniform assessment tool to enable a person-centric approach to service delivery. The assessment tool will be used to understand the range of supports the resident is eligible for and will be the basis for referral and connection to an individualized array of mainstream services. The assessment will be the foundation for connection to HPRP or other existing prevention or housing programs and will determine whether the resident is offered case management to assist with housing stabilization. However, the District will seek leverage HPRP activities with the Department of Employment Services and related activities recognizing that employment is critical for self sufficiency.

The District further received comments requesting that HPRP funds be utilized for employment issues and job training, security at housing programs, and as it related to the creation and improvement of new and existing shelter services. These activities will not be included in the HPRP program, as they are not eligible HPRP activities.

It is important to note that HPRP does not provide long term or permanent housing supports. Resources will be targeted for those with most at risk of homelessness or with barriers to housing, and who are committed to independently sustaining housing after the subsidy ends.

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 sub grantees. Note that a sub grantee is defined as the organization to which the grantee provides HPRP funds.

Competitive Process

Formula Allocation

Other (Specify: Competitive and Formula Allocation)

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

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Response:

The process that DHCD plans to use to select HPRP sub-grantees will entail a competitive (1) Request for Proposals (RFP) Process, as well as (2) providing monetary awards to previously selected District sub-grantees who provide targeted outreach, client case management, credit counseling, and Emergency Rental Assistance Program (ERAP) administration services that are determined to be eligible HPRP activities.

The RFP process will identify the eligible uses of HPRP funds and will request proposals to provide homelessness prevention funding to persons at risk of becoming homeless; for diversion programs; and for rapid re-housing coupled with time-limited subsidies for singles and families exiting emergency and transitional programs.

The RFP(s) will be made available to the public in accordance with all applicable District policies and procedures. Eligible applications will be competitively evaluated and ranked

Providing monetary awards to existing District approved client case management, credit counseling, and Emergency Rental Assistance Program providers in order to conduct eligible HPRP activities will occur based upon a District-approved process.

3. Briefly describe the process the grantee plans to use, once HUD signs the grant agreement, to allocate funds available to sub-grantees by September 30, 2009, as required by the HPRP Notice (limit 250 words).

Response:

As referenced above, shortly after DHCD receives notice from HUD of acceptance of the HPRP Substantial Amendment, we will work with DHS to release RFP(s) for the funds that will be allocated competitively. Allocation to existing service providers will occur by September 30, 2009 in consultation with DHS and other District agencies serving the target population, and in accordance with the approved HPRP Substantial Amendment.

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 sub-grantees (limit 500 words).

Response:

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As required, HMIS will be the reporting mechanism for all HPRP activities, with Quarterly Progress Reports submitted to HUD. Quarterly Progress Reports will be used as an opportunity to evaluate both grantee and sub-grantee use of funds, ensuring effective and timely use. The HPRP Operating Instructions will govern all HPRP activities.

The District's HPRP prevention, diversion and rapid re-housing efforts will be measured for their effectiveness, considering the varying risk levels of the sub-populations being served. The administration of the Program will be geared to ensuring that these resources are used efficiently. Measures adopted may include the following:

Goal 1: Prevent people from becoming homeless.

Goal 1 Measures

- Number of households identified as having a housing problem that warrant a referral to a homelessness prevention program
- Number and percentage of people served who are at highest risk of homelessness (stratify by risk factors such as income, housing situation, etc.)
- Number and percentage of highest-risk households served who do not become homeless within 12 months
- Cost per household assisted
- Overall number of people who become homeless in the community

Goal 2: Divert people who are applying for shelter, when appropriate, into other housing.

Goal 2 Measures

- Number and percentage of households who apply for shelter or other homeless assistance who are assessed for diversion
- Number and percentage of households who are successfully diverted from homelessness
- Number and percentage of households who are diverted who become homeless within 12 months
- Cost per household assisted

Goal 3: Help people who become homeless to quickly move into permanent housing.

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Goal 3 Measures

- Number and percentage of households who are assessed for their barriers to housing within 7 days of shelter entry
- Average length of time people are homeless (for all homeless people in the system and for just those served by a re-housing program)
- Percentage of households who receive re-housing services who do not become homeless again within 12 months
- Overall number of people in shelter
- Number of landlords and the number of units of housing that participate in the re-housing program

Concerning jobs created and retained, this plan anticipates that the District and its sub-grantees will track the creation and retention of case management and staff positions to administer the HPRP Program. These jobs will be reported as “created” or “retained” through the use of HPRP funds.

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:

Under the auspices of the City Administrator, the District has implemented a workgroup structure to enhance interagency collaboration for the programming and use of all federal stimulus funds. Weekly interagency conference calls and a specialized intranet site shared across agencies ensure close calibration of goals and activities. DHCD serves as the key contact for all housing-related stimulus funds, with participation from relevant agencies. Opportunity for public participation is heightened through a new website- www.recovery.dc.gov- that tracks milestones related to stimulus funds across all agencies.

As we have in the planning process, DHCD and DHS and will continue to work jointly with input from multiple government offices and agencies serving similar target populations, including, but not limited to the following: HIV/AIDS Administration, Department of Health; Office of Victim Services, Office of the Tenant Advocate, Child and Family Services Agency, Department of Mental Health, Department of Employment Services (DOES), and the Office on Aging in order to maximize the effective and timely use of HPRP funds.

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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:

As with the administration of Emergency Shelter Grant (ESG) funds, DHCD will maintain ongoing contact with The Community Partnership for the Prevention of Homelessness and with Continuum of Care organizations.

The DC Department of Housing and Community Development (DHCD), the DC Department of Human Services (DHS), and The Community Partnership for the Prevention of Homelessness (TCP) plan to continue hosting public meetings targeted to the Continuum of Care in order to discuss progress in meeting program goals and ensuring timely and effective use of HPRP funding provided through the American Recovery and Reinvestment Act of 2009.

Additionally, both DHCD and DHS serve on the District's Interagency Council on Homelessness (ICH), which provides a bimonthly forum for information sharing and collaboration with a broad array of stakeholders.

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 District's Consolidated Plan places a priority on serving vulnerable populations, including homeless individuals and families, and those at risk of homelessness. HPRP resources will expand our ability to provide housing and related services for these households to achieve housing stability.

Rapid re-housing and stabilization assistance will be available for people who are homeless according to HUD's definition. During the period of the subsidy, these individuals and families will be connected to the resources and services needed for them to become self-sufficient by the time their subsidy expires. Criteria such as employment status, income level, employment experience, education level, job skills and training experience, and willingness to address barriers to self-sufficiency will be considered as factors for targeting those that are likely to be able to sustain housing beyond the timeframe of HPRP supports.

Households will be reassessed at 3-month intervals for continued need for housing supports. As needed, the program will provide supportive services, connections to

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employment training and address client needs to enable program participants to independently maintain their housing at the conclusion of the assistance period. Consistent with other local housing programs, where feasible, the District will require participants receiving medium-term subsidies to pay 30% of their income toward rent. When appropriate, the District will implement graduated subsidies to assist in transitioning families from rental supports. The District will strive to provide the smallest subsidy needed, for the shortest essential time period, so that we may assist the greatest number of households possible.

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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.

HPRP Estimated Budget Summary			
	Homelessness Prevention	Rapid Re-housing	Total Amount Budgeted
Financial Assistance ¹	\$ 1,049,400	\$ 3,339,750	\$ 4,389,150
Housing Relocation and Stabilization Services ²	\$ 667,756	\$ 1,558,097	\$ 2,225,853
Subtotal (add previous two rows)	\$ 1,717,156	\$ 4,897,847	\$ 6,615,003

Data Collection and Evaluation ³	\$500,000
Administration (up to 5% of allocation)	\$374,473
Total HPRP Amount Budgeted⁴	\$7,489,476

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

Title