

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

Attached are the forms and certifications required for the city of Irving's substantial amendment for the 2004-2009 Consolidated Plan and 2008 Action Plan. The proposed activities include:

- \$626,612 for financial assistance for homeless prevention and rapid re-housing;
- \$211,000 for housing relocation and stabilization services;
- \$46,534 for data collection and evaluation; and
- \$46,534 for administration.

Activities funded through HPRP will address the priority needs identified in the Consolidated Plan for:

- Establishing and supporting programs to prevent homelessness; and
- Increasing the amount of affordable single family housing.

The public was invited to make comments and recommendations regarding the city's proposed use of HPRP funds in a notice published in the Dallas Morning News on May 3, 2009. The public comment period closed on May 15, 2009. In addition, a notice regarding the program was posted on the relevant city department's webpage, a public input session regarding the program was held on April 15, 2009, and the draft plan for the program was presented to the Dallas Continuum of Care on April 28, 2009.

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.

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

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 Irving, Texas
Name of Entity or Department Administering Funds	Housing and Human Services Department
HPRP Contact Person (person to answer questions about this amendment and HPRP)	Vivian Ballou
Title	Executive Director
Address Line 1	2520 W. Irving Blvd.
Address Line 2	Suite 300
City, State, Zip Code	Irving, Texas 75061
Telephone	972-721-4800
Fax	972-986-6794
Email Address	vballou@cityofirving.org
Authorized Official (if different from Contact Person)	Herbert A. Gears
Title	Mayor
Address Line 1	825 W. Irving Blvd.
Address Line 2	
City, State, Zip Code	Irving, Texas 75060
Telephone	972-721-2493
Fax	972-7212493
Email Address	mayor@cityofirving.org
Web Address where this Form is Posted	www.cityofirving.org/housing-human-services

Amount Grantee is Eligible to Receive*	\$930,680
Amount Grantee is Requesting	\$930,680

*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 Irving has taken several steps to solicit citizen participation including:

- requested input from current ESG subrecipients regarding their interest and capacity to provide expanded homeless prevention programs prior to release of federal HPRP notice;
- published notice of funding availability (for HPRP and other federal funds) in Dallas Morning News on April 5, 2009 and requested applications for funding on or before May 8, 2009;
- provided applicant training and public input session regarding HPRP and other federally funded programs on April 15, 2009;
- participated in coordination meeting (May 8, 2009) and discussions with other Dallas County participating jurisdictions which received notification of HPRP allocations;
- participated in State (April 7, 2009) and Dallas (April 6, 2009) public input sessions (considered comments in Irving context);
- presented to and surveyed attendees of Poverty and Homeless Coalition of Irving (March 25 and April 22, 2009), Irving Human Services Council (April 20, 2009), Dallas Continuum of Care (April 28, 2009) for input regarding Irving's proposed program and allocations;
- published a public notice in the Dallas Morning News on May 3, 2009 requesting input during its 12 day public comment period;
- posted a request for public comment, related survey, and information about the proposed Irving program and federal guidance on the city of Irving, Housing and Human Services (HHS) Department's website (updated as proposed program evolves).

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)

HHS staff received input through comments shared at the HPRP public information session which was attended by thirteen people. In addition, staff received completed Irving HPRP surveys from fifteen people. The following summarizes comments received:

- HHS should allocate a higher proportion of funds to housing relocation and stabilization (accepted; originally proposed 18%, increased to 23%);
- The children and families of Irving ISD, especially single parent families, should be given priority in this program (tentatively accepted pending the approval of City Council; eligible families in the Irving ISD will be given priority in this program);
- Homeless veteran women with children and women with older children should be given priority in this program (tentatively accepted pending the approval of City Council; families of all types will be given priority in this program);
- Need clarification on work and education materials (accepted; program requirements will be explained in greater detail after proposed allocations are determined and before contracts are developed);
- Library can be a source of publicity and public information for this program (accepted; library will be included in the marketing plan for this program);
- Difficult to have potential subgrantee organization's board agree to changing eligibility requirements enabling agency to meet City of Irving requirement that no eligibility criteria beyond those defined by HUD will be allowed for this program (agree; reiterate that Irving HPRP program will not allow subgrantee agencies to institute minimum residency and "once in a lifetime assistance" in this program);
- Prospective subgrantees would like to see up front funding or direct payment through city of Irving for this program (city determining internal financing requirements and anticipates that city will require reimbursement program; working on ways to accommodate request such as distribution of preloaded bank cards for hotel/motel stays and direct payment to landlords through city);
- Prospective subgrantees requested that city determine whether landlords are current on mortgage payments prior to placing program participants in units (tentatively accepted; HHS working on developing internal process for determining whether apartments in foreclosure process);
- Apartment managers should be educated about this program (accepted; a major component of the housing relocation and stabilization component of this program will involve marketing to target apartment complexes);
- Many apartment complexes in Irving require background checks so it is difficult for someone with a criminal background to be approved for housing in Irving, especially with the Crime Free Apartments initiative (agree; a major component of the housing relocation and stabilization component of this program will involve market to target apartment

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

complexes and identifying and establishing a relationship with complexes that do accept participants with criminal backgrounds).

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 following is the process and timeline for the Irving HPRP:

- requested input from current ESG subrecipients regarding their interest and capacity to provide expanded homeless prevention programs prior to release of federal HPRP notice;
- published notice of funding availability (for HPRP and other federal funds) in Dallas Morning News on April 5, 2009;
- applications were available on the HHS website;
- provided applicant training and public input session regarding HPRP and other federally funded programs on April 15, 2009;
- deadline for submission of applications, May 8, 2009;
- HHS staff review of proposals, May 8 to 21, 2009;
- HHS Board allocation meeting and applicant interviews, May 21, 2009;
- applicants notified of proposed allocations, May 22, 2009;
- training regarding HPRP requirements for proposed subgrantees, TBD
- HHS Board allocation public hearing, June 10, 2009;
- HHS Board adoption, July 8, 2009;

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

- City Council work-session, July 22, 2009;
- City Council approval of Action Plan, July 23, 2009;
- applicant notification of awards, July 24, 2009;
- contract development, August, 2009;
- contract execution, by September 30, 2009;
- contract term begins, October 1, 2009;
- contract term ends, September 30, 2011.

Four HPRP applications were received by HHS. The applications were scored as follows:

- organizational capacity and experience 30 points
- evidence of need/non-duplication and collaboration 30 points
- statement of work/performance objectives 30 points
- budget and budget narrative 10 points

Based on the applications received, HHS staff proposes to administer the rapid re-housing component of the financial assistance, the case management and credit repair components of the housing relocation and stabilization component, and the data collection and evaluation components of the program internally. Staff recommends that local non-profit service providers contract to provide much of the homelessness prevention component of the financial assistance.

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:

City of Irving has reviewed and made staff recommendations regarding applications received from community non-profit agencies to deliver components of the Irving HPRP program. A budget retreat and interviews of applicant agencies will be hosted by the HHS Board on May 21, 2009. Applicant agencies will be notified of the HHS Board decisions and will be provided additional training regarding HPRP requirements. The HHS Board's proposed allocations will be presented at a public hearing prior to its June 10 meeting and will be considered by Irving City Council at its work-session and subsequent public hearing and finalized at its Council meeting on July 22, 2009 and July 23, 2009, respectfully. Following council's allocation decisions, HHS staff will notify subgrantee organizations and will begin the contract development and program planning process. All contracts will be fully executed by September 30, 2009. Programs will begin in October and funds will be allocated to agencies partnering to deliver HPRP programs thereafter.

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

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:

Detailed Irving HPRP policies and procedures will define effective and timely use of funds as well as monitoring procedures. At a minimum, policies and procedures will address:

- Monthly processing of invoices and requests for reimbursement;
- Intake processes for approval of rapid re-housing participants;
- Recertification for rapid re-housing participants;
- HMIS entry;
- Desk monitoring, evaluation, reporting and risk analysis; and
- Standard forms; and
- Marketing plan.

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 Irving has met with other project jurisdictions that were also allocated HPRP funds. The City of Irving has met with and discussed best use of funds to ensure compatibility and effective expenditure of federal funds continuum wide. Efforts have been made to report uniformly with Dallas County to report uniformly within all entitlements receiving HPRP funds. In addition, efforts were made for all entitlements receiving HPRP funds to require use of uniform eligibility and other paperwork from subgrantees.

As the program progresses, the City of Irving will increase its involvement with Texas Workforce Commission programs and with county Health and Human Service recipients of Strengthening Communities Fund – State, Local, and Tribal Government Capacity Building Program funds in order to increase its awareness of available services to better serve its program participants.

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

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:

At the May 8, 2009 HPRP Grantees meeting, convened by Metro Dallas Homeless Alliance (Dallas Continuum of Care lead organization), attendees agreed to:

- participate in monthly HPRP coordination and collaboration meetings;
- collaborate on and jointly fund the establishment of HMIS program set up, training, and intake forms;
- participation in HMIS trainings; and
- discussion of joint marketing opportunities.

In addition, the Irving HPRP program will be provided through partnerships with subgrantee and referral relationships with other member organizations of the Poverty and Homeless Coalition of Irving and the Irving Human Services Council. The program will be marketed to all organizations in Irving that regularly come into contact with people with low incomes who may need assistance in meeting their basic needs including faith based organizations especially churches, state and county programs, and other organizations that received American Recovery and Reinvestment Act funds.

A critical component of case management for the program will be assessing participants' incomes and mainstream benefit entitlements. A priority for intervention will be to assist participants in accessing mainstream benefits they are entitled to receive.

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:

HPRP funds allocated to financial assistance and housing relocation and stabilization services will be used in a manner consistent with the City of Irving's 2004-2009 Consolidated Plan. Activities funded through HPRP will address the following Consolidated Plan priority needs:

- Establishing and supporting programs to prevent homelessness; and
- Increasing the amount of affordable single-family housing.

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

While the City of Irving's 2009-2014 Consolidated Plan is under development, all input received to date suggests that the priorities noted above will remain and may be strengthened such that they are even more consistent with HPRP activities.

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	\$501,290	\$125,322	\$626,612
Housing Relocation and Stabilization Services ²	\$105,500	\$105,500	\$211,000
Subtotal (add previous two rows)	\$606,790	\$230,822	\$837,612
Data Collection and Evaluation ³			\$46,534
Administration (up to 5% of allocation)			\$46,534
Total HPRP Amount Budgeted⁴			\$930,680

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