

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	City of Asheville
Name of Entity or Department Administering Funds	City of Asheville Community Development Division, Planning Department
HPRP Contact Person (person to answer questions about this amendment and HPRP)	Jeff Staudinger
Title	Community Development Director
Address Line 1	City of Asheville, CD Office
Address Line 2	P.O. Box 7148
City, State, Zip Code	Asheville, NC 28801
Telephone	(828) 259-5723
Fax	(828) 350-0035
Email Address	jstaudinger@ashevillenc.gov
Authorized Official (if different from Contact Person)	Gary Jackson
Title	City Manager
Address Line 1	City of Asheville, Manager's Office
Address Line 2	P. O. Box 7148
City, State, Zip Code	Asheville, NC 28801
Telephone	(828) 259-5604
Fax	(828) 259-5499
Email Address	gjackson@ashevillenc.gov
Web Address where this Form is Posted	TBD

Amount Grantee is Eligible to Receive*	\$ 509,460
Amount Grantee is Requesting	\$ 509,460

*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).

Asheville's Citizen Participation Plan states: "The City Council must approve all substantial amendments. Notice of the proposed amendment will be published for comment at least 30 days before it is to be approved, and a public hearing will be held during or at the end of the comment period. Exceptionally, amendments of an urgent nature may be made after a shorter comment period."

City of Asheville Community Development staff developed the Substantial Amendment to the Consolidated plan (SAC), which included dialogue and input from the 10-Year Plan Advisory Committee and the Homeless Coalition:

4/1/09 A public meeting was held to explain general HPRP guidelines.
4/7/09: HPRP guidelines discussed at the Homeless Coalition Meeting
4/14/09: HPRP guidelines reviewed by the 10 Year Plan Advisory Committee, recommendations for the Substantial Amendment provided.

On 4/22/09 final draft of the SAC was reviewed and approved by the City Asheville Housing and Community Development Committee of City Council. Their meetings are public.

On 4/28/09 a notice of the SAC was published following the City of Asheville and Asheville Regional Housing Consortium's Citizen Participation Plan. The public comment period was open for 15 days, from 4/28/09-5/12/09.

On 5/12/09, a public hearing on the SAC was held, and later that same day, City Council approved an amendment to the Action Plan.

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

- ☐ 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: **TBD**

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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).

City of Asheville Community Development staff will develop the sub-grantee application process using technical assistance from HUD approved sources along with input from the 10-Year Plan Advisory Committee and the Homeless Coalition:

6/2/09: HPRP sub-grantee application process will be discussed at the Homeless Coalition Meeting, recommendations will be provided.

6/9/09: HPRP sub-grantee application process will be discussed 10 Year Plan Advisory Committee, recommendations will be provided.

On 6/15/09 Public Notice will request that interested parties submit a pre-application for sub-grantees.

On 6/29/09 Sub-Grantee Pre-Applications will be due. Interested sub-grantee pre-applications will be evaluated using thresholds set by HUD's HPRP guidelines.

On 7/10/09 Public notice will announce HPRP Sub-Grantee Application guidelines and a request for applications. On that same day, a public meeting to discuss HPRP Sub-Grantee Application Guidelines will occur.

On 8/10/09, Sub-Grantee Applications will be due. Sub-grantees will have 30 days to submit a completed application to the Community Development Division of the City of Asheville's Planning Department. Applications will be reviewed and scored by staff.

On 8/26/09, completed scoring sheets and applications will be reviewed the Housing and Community Development Committee of Asheville's City Council on 8/26/09. Their

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meetings are public. The Committee will vote on how to disperse the HPRP funds to applicants.

On 8/27/09, public notice will announce proposed HPRP Sub-Grantee awards. Public comment will be open for 12 days between 8/28/09 and 9/8/09. A public hearing will take place on 9/8/09. Later that same day, City Council will approve the HPRP funding plan.

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).

HPRP funds will be allocated by City Council on September 8, 2009. The process of determining grant awards is detailed, above.

City staff will develop grant agreements (contracts) for subgrantee, based up HUD guidelines for the HPRP and modeled after the existing City contracts for CDBG subrecipients. The contract template will be developed by the City staff and reviewed by the City legal staff during July and August.

Scope of service and budget attachments to the contracts will be prepared in draft form by staff prior to the City Council decisions and revised immediately following if necessary. Contracts will be delivered to grantees by September 12, 2009.

A post-award meeting will be scheduled with each subgrantee for the week of September 14. Grant terms and conditions will be discussed, as will all certifications, regulatory requirements, reporting requirements, scopes or work and budgets.

Grantee will be directed to review and sign contracts by September 30, 2009.

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).

The City of Asheville's Community Development Division has significant experience in monitoring HUD HOME and CDBG funds, and will bring that experience to bear in monitoring HPRP funds.

2.5% of HPRP funding will be used by the Community Development Office to administer the grant in order to document, track, and report on City administrative costs in accordance with existing Housing and Community Development Department standards for utilization of administrative grant funds: grantee will comply with 24CFR 85.36(b)(3) and Sub-Grantee(s) will comply with 24CFR 84.82.

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Grant administration will allow the office to provide reimbursement and report on grant-related activities using IDIS, monitor sub-grantee compliance, monitor sub-grantee HMIS data, provide technical support, and maintain a relationship with HUD to ensure that any required reports are completed on time, such as the initial, quarterly, and annual performance reports.

The City will follow its Monitoring Plan for all HPRP subgrantees. The Monitoring Plan requires that the grantee submit progress reports on a schedule established in the contract; that staff review the progress reports as submitted; and schedule desk reviews and site visits based upon the assigned risk profile of the grantee and HUD requirements.

Because of the newness of the program, sub-grantees' program files and agency sites will be monitored at least annually by Community Development monitoring and program staff. Staff will review financial reports, independent external audits, expenditures, and other related files or practices annually. Along with HPRP compliance, staff monitor for habitability standards, equal participation of religious organizations, non-discrimination and equal opportunity, fair housing, lead based paint, uniform administrative, lobbying and disclosure, and drug-free workplace requirements, and procurement of recovered materials. Written recommendations or requirement notices will be provided by Grantee to Sub-grantee if such action is appropriate.

Sub-grantee(s) will sign a contract for the period of performance, expected to be 24 months from contract execution.

Sub-grantee(s) will use 2.5% of HPRP funding to manage the HPRP funds and provide monthly activity and outcomes reports to the CD office. Monthly requisitions, summary expense reports, expense documentation, and grant service reports will be submitted by sub-grantee(s) for each prior month. Summary Expense Reports shall organize expenditures as the grantee establishes and in accordance with grant budget categories. Quarterly performance outcome reports shall be submitted to the Grantee.

95% of the funds will be managed by the sub-grantee(s) to dispense financial assistance, provide outreach, provide housing stabilization services, and record & evaluate data using the HMIS system. The City reserves the authority to narrow the scope of eligible expenses in conformity with its administrative policies and practices applied to other homelessness prevention service provider sub-grantees.

Sub-grantees will be responsible for ensuring that financial assistance is used for clients who are eligible and is processed in an efficient manner.

Pending the award of HUD funds and a budget ordinance adopted by the City Council, the sub-grantee(s) shall be able to submit eligible expenditures in a contract period that shall commence no later than September 30, 2009.

D. Collaboration

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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).

To ensure successful collaboration, the Community Development office will partner with teams managing Recovery and Reinvestment Act funds (ARRA funds) in the Governor's office, Buncombe County's office, and the City of Asheville. Additionally, as agencies and organizations apply for and receive ARRA funds, the Community Development office will work with those agencies, organizations, and networks to ensure that community need of identified target populations is efficiently and realistically addressed while avoiding duplication.

The existing housing crisis referral and response network will participate in the development and implementation of the HPRP process to ensure that it reflects needs specific to the Asheville area. As a part of the application process, sub-grantee(s) will need to explain how they expect to collaborate with the existing housing crisis referral and response network and include proof of the collaboration to ensure that the HPRP funds best meet community need.

Additionally, the Community Development office will continue to participate in HUD sanctioned technical assistance calls and coordinate with the National Alliance to End Homelessness as well as the North Carolina Coalition to End Homelessness to understand and incorporate best practices related to ARRA collaborations.

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

Asheville-Buncombe's Continuum of Care is an active group, as evidenced by their consistently high score on their HUD CoC application and successful community outcomes related to housing for people who are homeless or at risk of homelessness. The group is made up of (get the list from Brian).

The Continuum of Care has been educated about the HPRP funding, starting with the April 1, 2009 public meeting and the discussion at their monthly April 7, 2009 meeting. They will continue to participate in the development of HPRP programming to ensure that the HPRP funds are meeting the needs of clients and that the HPRP program is able to make referrals to and accept referrals from all applicable programs of agencies in the Continuum of Care.

After sub-grantee(s) are identified, the HPRP program will provide updates to the Continuum of Care and representatives from the HPRP program will participate in the

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“action groups” that focus on the areas of Housing and Services. This will allow a dynamic sharing of information, building the strength of the HPRP program and supporting the larger Continuum of Care.

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 HPRP Grant funds, which focus resources on housing prevention and rapid re-housing, are directly in line with the goals of the Consolidated Plan, which refers to Asheville-Buncombe’s 10-Year Plan as the guiding principals for action. The 10-Year plan specifically identifies prevention and rapid re-housing as key goals.

The Consolidated Plan states the following strategies in reaching the goal of preventing homelessness and rapid re-housing: resource coordination, financial assistance and associated housing stabilization services, which are all elements found in the HPRP grant. The HPRP grant will strengthen the existing housing crisis response network outlined in the Consolidated Plan, allowing agencies to continue to serve people who are homeless or at risk of homelessness.

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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	\$ 152,850	\$142,650	\$ 295,500
Housing Relocation and Stabilization Services ²	\$86,600	\$91,700	\$178,300
Subtotal (add previous two rows)	\$239,450	\$234,350	\$473,800

Data Collection and Evaluation ³	\$10,190
Administration (up to 5% of allocation)	\$25,470
Total HPRP Amount Budgeted⁴	\$509,460

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