

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	Harris County
Name of Entity or Department Administering Funds	Community Services Department
HPRP Contact Person (person to answer questions about this amendment and HPRP)	Daphne Lemelle
Title	Community Development Director
Address Line 1	8410 Lantern Point Dr
Address Line 2	
City, State, Zip Code	Houston, TX 77054
Telephone	713-578-2000
Fax	713-578-2090
Email Address	daphne.lemelle@csd.hctx.net
Authorized Official (if different from Contact Person)	David B. Turkel
Title	Director
Address Line 1	8410 Lantern Point Dr
Address Line 2	
City, State, Zip Code	Houston, TX 77054
Telephone	713-578-2000
Fax	713-578-2090
Email Address	david.turkel@csd.hctx.net
Web Address where this Form is Posted	www.csd.hctx.net

Amount Grantee is Eligible to Receive*	\$ 4,463,961
Amount Grantee is Requesting	\$ 4,463,961

*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:

In accordance with Harris County's public participation requirements, the public was given an opportunity to review the Amendment during a 14-day public review period. Harris County provided a shortened public review period in accordance with Docket Number RF-5307-N-01 released by HUD on March 19, 2009. The public review of the HPRP Amendment was held from April 21, 2009 to May 5, 2009, with the public hearing taking place on April 28, 2009.

In addition, stakeholders from area organizations were given additional opportunities to participate in the amendment process. Harris County presented at a meeting for homeless service providers on April 1, 2009. In addition, Harris County participated in two coordination committee meetings on March 20, 2009 and April 9, 2009. The meetings included participants representing key stakeholders such as Coalition for the Homeless, the City of Houston Housing and Community Development, City of Houston Health and Human Services, Alliance of Community Assistance Ministries, Harris County Social Services, Harris County Protective Services for Children and Adults and Lone Star Legal Aide.

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: During the public hearing, stakeholders requested more detailed information regarding different aspects of Harris County's Amendment. These requests concerned the structure of the RFP process for funding, collaborations with other public entities, the model and structure for the Rapid Re-Housing portion of funds and Harris County's plan for including the formerly incarcerated population.

Harris County informed participants that there would be continued collaboration with the City of Houston to create a streamlined RFP process and to ensure that the City and County are not duplicating services, but providing complimentary programming. In addition, Harris County will work closely with the Houston/Harris County Coalition for the Homeless to develop the Rapid Re-

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Housing portion of the HPRP. Finally, the funding through HPRP is available for formerly incarcerated residents, and Harris County will decide through partnerships with service providers as well as proposals received as part of its RFP process how to best serve this population.

Harris County also received two written public comments outside of the Hearing from Lone Star Legal Aide and Homeless Youth Network of Houston/Harris County. Lone Star Legal Aide suggested that Harris County allot \$682,500 in HPRP RFP funds for homeless prevention legal services. While Harris County will certainly consider the importance of Lone Star Legal Aide's work as part of comprehensive homeless prevention, the allotment exceeds Harris County's anticipated allocation for Housing Relocation and Stabilization Services through its RFP. Lone Star Legal Aide will have an opportunity to submit in the competitive RFP process.

Homeless Youth Network of Houston/Harris County (HYN) also submitted a comment to solicit funding to increase the organizational capacity of HYN. As youth aging out of foster care are a target group for funding, Harris County will work closely with HYN to ensure that outreach to this population is adequate. However, HYN will be expected to participate in the competitive RFP process to receive HPRP funding.

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: Harris County will provide direct allocation for operation of the Homeless Prevention services through our own Social Services Department in addition to a competitive RFP process for the remaining funding.)

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

Response: Harris County anticipates releasing a Request for Proposals (RFP) in late June or early July to select subgrantees. Because Harris County releases an annual RFP for entitlement funding, the same potential applicants, as well as any who have contacted Harris County through the public notice process, will receive notification of funding availability. Applicants will likely have 3-4 weeks to submit

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applications. Upon submission, applications will go through an evaluation process where a review committee will submit recommendations of eligible projects to the Director and Commissioners Court for approval. Upon approval, final selections will receive contracts. Harris County will also allocate funding to operate homeless prevention services through the County's Social Services division.

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: Harris County understands that timeliness is an important aspect of the HPRP funding, and will rigorously select subgrantees that demonstrate an ability of perform the activities outlined in HPRP. Harris County will prioritize selection to subgrantees with prior experience with Federal grants, and will not consider funding newly created programs, rather those that supplement existing programs.

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: As a current HUD Entitlement Grantee, Harris County requires all subgrantees to submit monthly reports that identify expenditures and units served to ensure that the subgrantees are up to date with their spending and units of service agreed upon in the service contract. Both programmatic and financial staff review these reports to ensure eligible costs and activities. All reports are due within ten working days of the end of the monthly reporting period, and staff contact grantees that fail to submit timely reports until the subgrantee submits reports. Funding is withheld from grantees until Harris County receives accurate and eligible monthly reports. This monthly 'desk monitoring' will continue with the HPRP program, though timeliness of reports may require more stringent deadlines for reporting. In addition, Harris County will conduct on site monitoring for all subgrantees at least annually. Any subgrantees who are not able to comply with HPRP regulations will have funding reallocated to a successful subgrantee.

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).

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Response: The local Council of Government, Houston-Galveston Area Council (H-GAC) is the regional organization through which local governments consider issues and cooperate in solving area wide problems. Through H-GAC Harris County will pursue meetings and coordination of services with agencies who will receive stimulus funding, such as the Workforce Development Board and local Health and Human Services departments.

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: Harris County is working closely with the Houston/Harris County Coalition for the Homeless, the agency responsible for administering the Continuum of Care, to ensure HPRP funding meets the needs of the community and are allocated in such a way that addresses the 10-year plan to address Homelessness. Harris County attended two coordination meetings facilitated by the Coalition to discuss opportunities and priorities for the HPRP funding. In addition, Harris County presented to agency members of the Coalition during a monthly meeting to discuss Harris County's target population and funding, inform agencies of available funding, and encourage input from agencies during the public comment period. Harris County will continue to work with the Coalition to develop the Rapid Re-housing portion of funding, as the Coalition holds expertise in this area from their experience managing a locally funded re-housing program.

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: One of the goals for the Housing portion of the Harris County Consolidated Plan is to provide renters of affordable housing with rental assistance. The increase in financial assistance for rental assistance under HPRP is consistent with providing this goal. In addition, Harris County's Plan outlines a commitment to providing services that will assist with homeless prevention activities and includes as an objective to provide homeless prevention services to over 500 families and individuals in the County. Finally, the Homeless section details the County's commitment to working with service providers and the Coalition as an important aspect of achieving the goals of the Plan. Harris County's partnerships will increase with HPRP funding, as the County works to ensure that all stakeholders share a voice in the process and are represented in the County's HPRP funding.

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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	\$ 1,925,305	\$ 282,690	\$2,207,995
Housing Relocation and Stabilization Services ²	\$ 1,640,075	\$ 282,690	\$1,922,768
Subtotal (add previous two rows)	\$ 3,565,380	\$ 565,380	\$4,130,763
Data Collection and Evaluation ³			\$ 110,000
Administration (up to 5% of allocation)			\$ 223,198
Total HPRP Amount Budgeted⁴			\$4,463,961

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.

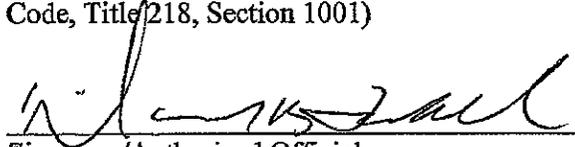
³Data collection and evaluation includes costs associated with operating HUD-approved homeless management information systems for purposes of collecting unduplicated counts of homeless persons and analyzing patterns of use of HPRP funds.

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

5/12/09

Date

Title