

## **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 the U.S Department of Housing and Urban Development (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](http://www.hudhre.info)). This site will be regularly updated to include HPRP resources developed by HUD and its technical assistance providers.

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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**

<b>Grantee Name</b>	City of San Diego
<b>Name of Entity or Department Administering Funds</b>	City Planning and Community Investment
<b>HPRP Contact Person</b> (person to answer questions about this amendment and HPRP)	Amy Benjamin
<b>Title</b>	Housing and Homeless Coordinator
<b>Address Line 1</b>	202 C Street, MS 5A
<b>Address Line 2</b>	
<b>City, State, Zip Code</b>	San Diego, CA 92101
<b>Telephone</b>	619-533-6525
<b>Fax</b>	619-236-6478
<b>Email Address</b>	abenjamin@sandiego.gov
<b>Authorized Official</b> (if different from Contact Person)	William Anderson, FAICP
<b>Title</b>	Director, City Planning and Community Investment
<b>Address Line 1</b>	202 C Street, MS 5A
<b>Address Line 2</b>	
<b>City, State, Zip Code</b>	San Diego, CA 92101
<b>Telephone</b>	619-236-6361
<b>Fax</b>	619-236-6478
<b>Email Address</b>	andersonw@sandiego.gov
<b>Web Address where this Form is Posted</b>	www.sdhc.org

<b>Amount Grantee is Eligible to Receive*</b>	<b>\$ 6,168,104</b>
<b>Amount Grantee is Requesting</b>	<b>\$ 6,168,104</b>

\*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 Proposed Substantial Amendment (Amendment) to the Consolidated Plan 2008 Action Plan for the Homelessness Prevention and Rapid Re-Housing Program (HPRP) for the City of San Diego (City) will be made available for public comment on the City's website, as well as the San Diego Housing Commission's (Housing Commission) website between April 24 and May 8, 2009.

Three public hearings for the proposed substantial amendment are scheduled. The first hearing is to be held Friday, May 1, 2009 at 9:00am at San Diego City Council Budget and Finance Committee. The second hearing is to be held Wednesday, May 6, 2009 at 9:00a.m at the Housing Commission. The final hearing will be held Tuesday, May 12, 2009 at 10:00am at San Diego City Council.

Notice regarding public comment and hearings ran in the San Diego Union Tribune on April 23, 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: Available May 9

**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.

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- Competitive Process
- Formula Allocation
- Other (Specify: Subrecipient Agreement with the Housing Commission, 24 C.F.R. § 570.500)

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

Response:

**Subrecipient Agreement:**

The City of San Diego will enter into a subrecipient agreement with the San Diego Housing Commission, in accordance with 24 C.F.R. 570.50.

In 1968, the City Council (through Resolution No. 194944) established the City of San Diego Housing Authority, and pursuant to section 34290 of the Housing Authorities Law, the Council declared itself the Commissioners of the Housing Authority. In 1978, the City Council (through Ordinance No. 12515NS) established the San Diego Housing Commission to investigate and advise the city regarding housing issues and to administer housing programs.

**Competitive Process:**

A competitive process will be used for any services not directly administered by the City or Commission, The Commission's contracting and procurement policy complies with the Annual Contributions Contract (ACC) between the Housing Commission and the HUD, Federal Regulations at 24 CFR 85.36, the procurement standards of the Procurement Handbook for Public Housing Authorities, HUD Handbook 7460.8, Rev 2, and applicable State and Local laws.

Additionally, the City of San Diego will enter into a Consortium with other local participating jurisdictions to contract for services related to evaluation, monitoring, and reporting. As the lead agency of the Consortium, the City will follow all applicable competitive procurement practices as related to Federal, State, and local laws.

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:

Prior to receipt of grant funds, the Housing Commission will release Request for Funding Proposals (RFP) for portions of the grant that will not be administered by the Housing Commission. The City and Housing Commission will establish a selection committee to review proposals submitted in response to the RFP(s). The selection committee will provide recommendations to the Housing Commission Board, which will approve the ultimate selection of subgrantees.

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Upon receipt of grant funds, the City will enter into a subrecipient agreement with the Housing Commission through which funding will be directly allocated to the Housing Commission for services and programs associated with administration of the City's HPRP Plan. Subsequently, the Housing Commission will enter into subcontracts with agencies selected through a competitive RFP process.

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:

The City will obligate all funds by September 30, 2009, pursuant to the regulations set forth in HUD's HPRP notice. The City will draw down 60% of HPRP grant funds within two years of signature of HUD's grant agreement with the City. The City will also draw down 100% of the grant funds within three years of this date. Subrecipients will be selected prior to receipt of grant fund and subcontracts will be initiated immediately upon receipt of HPRP funds so that programs and services are delivered immediately. Timely expenditure of the funds was considered in determining the HPRP budget and funding allocations for each activity.

Subcontractors will be selected based upon experience administering similar programs and services to ensure effective and efficient administration. Prior to September 1, 2009, an evaluation and monitoring plan will be developed and will include sets of individual and client level data elements to be collected by each service provider in accordance with HUD reporting requirements. The data elements will be used to measure the required outputs and outcomes consistent with the *Revised HMIS Data and Technical Standards* and elements will be integrated with the local Homeless Management Information System (HMIS). The local HMIS system will be evaluated to determine if existing capacity is sufficient to meet HPRP program objectives, and will be enhanced to address any areas of deficiency.

An assessment tool will be developed and linked to the evaluation and monitoring plan and will be available for use immediately upon execution of subrecipient grant contracts. Additionally, subrecipients will be provided with the necessary tools for program evaluation and training on the use of those tools within the time specified for funding obligation.

Quarterly and annual reports will be generated through HMIS and submitted to the City for Integrated Disbursement & Information System (IDIS) reporting. The City will regularly monitor sub-recipient contracts to ensure compliance with all grant

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requirements. Monitoring practices include but are not limited to; frequent telephone contacts, written communications, analysis of reports and audits, onsite visits and monitoring reviews.

The Housing Commission will perform the following monitoring functions:

- 1) Prepare and make available to housing program participants general information regarding program eligibility criteria;
- 2) Review and determine eligibility of participating households prior to program enrollment;
- 3) Certify eligibility of program participants receiving medium term rental assistance every three months to ensure continued eligibility;
- 4) Inspect project books and records pertaining to the incomes and rents of participating households, as the Commission may deem necessary;
- 5) Conduct Housing Quality Standard inspection and determine Rent Reasonableness; and
- 6) Prepare quarterly and annual reports generated through HMIS and submitted to the City for IDIS reporting.

### **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 and Housing Commission jointly convened a stakeholder meeting on April 21, 2009 with local agencies that serve similar populations. The meeting served as a forum to initiate collaborations among agencies and link them with HPRP efforts. The meeting also sought to solicit input from these agencies regarding strategies for developing a local plan that maximizes American Recovery and Reinvestment Act (ARRA) investment.

Over 500 interested persons and organizations were invited to the meeting, including the San Diego City School District (U.S. Department of Education) and the County of San Diego Health and Human Services Department. The City strongly encourages that all subrecipients collaborate with other ARRA funded programs and continues to work with local agencies to forge these partnerships.

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The City and Housing Commission also participated in a number of meetings that sought to explore a regional approach to HPRP planning and expenditure. The meetings were hosted by a local philanthropic organization and discussed such topics as service delivery; needs analysis; HMIS collection; a regional assessment tool and a single point of entry.

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:

There are two Continuums of Care in the San Diego Region. Together, they form a regional body known as Regional Continuum of Care Council (RCCC). The RCCC designates a lead agency to provide HMIS services to the Continuum. The City will utilize this lead agency to meet HMIS requirements under HPRP.

The City and Housing Commission presented the HPRP substantial amendment to the RCCC to ensure that HPRP goals are consistent with RCCC goals and priorities. RCCC input and recommendations will be considered in developing the scopes of services for program administration.

Both RCCC and mainstream resource providers will be used as outreach points in attempt to target households most at risk. Additionally, the City plans to evaluate the ability to integrate mainstream resource data management systems into the local HMIS system.

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 San Diego FY2005-2009 Consolidated Plan's Five Year Strategic Plan provides a priority ranking assigned to each category of housing and community development need according to HUD criteria. Renters below 50% Area Median Income are ranked as a high priority.

The 2005-2009 Consolidated Plan also reports on the significant number of individuals and families at-risk of becoming homeless. According to the Plan, "experts estimate that for every family in a shelter there are two to three families who are on the verge of homelessness. The "at-risk" population is comprised of families and individuals living in poverty, who, upon loss of employment or other emergency requiring financial reserves, would lose their housing and become homeless. They experience housing and cost burdens equaling more than 50 percent of their income for housing."

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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.

<b>HPRP Estimated Budget Summary</b>			
	<b>Homelessness Prevention</b>	<b>Rapid Re-housing</b>	<b>Total Amount Budgeted</b>
Financial Assistance <sup>1</sup>	\$1,725,000	\$2,834,699	\$4,559,699
Housing Relocation and Stabilization Services <sup>2</sup>	\$490,000	\$510,000	\$1,000,000
<b>Subtotal</b> (add previous two rows)	<b>\$2,215,000</b>	<b>\$3,344,699</b>	<b>\$5,559,699</b>
Data Collection and Evaluation <sup>3</sup>			\$ 300,000
Administration (up to 5% of allocation)			\$ 308,405
<b>Total HPRP Amount Budgeted<sup>4</sup></b>			<b>\$ 6,168,104</b>

<sup>1</sup>Financial 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.

<sup>2</sup>Housing 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.

<sup>3</sup>Data 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.

<sup>4</sup>This 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)

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