

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)

**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 Columbus
Name of Entity or Department Administering Funds	City of Columbus
HPRP Contact Person (person to answer questions about this amendment and HPRP)	Mr. Kim Stands
Title	Assistant Housing Administrator
Address Line 1	50 W. Gay Street
Address Line 2	
City, State, Zip Code	Columbus, OH 43215
Telephone	614.645.7571
Fax	614.645.6675
Email Address	kistands@columbus.gov
Authorized Official (if different from Contact Person)	Mayor Michael B. Coleman
Title	Mayor
Address Line 1	90 W. Broad Street
Address Line 2	
City, State, Zip Code	Columbus, OH 43215
Telephone	614.645.7671
Fax	614.645.7811
Email Address	krhardin@columbus.gov
Web Address where this Form is Posted	www.columbus.gov

Amount Grantee is Eligible to Receive*	\$2,642,649
Amount Grantee is Requesting	\$2,642,649

*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).**

City of Columbus Response: The City of Columbus will make a substantial amendment to the Consolidated Plan 2008 Action Plan by adding the Homelessness Prevention and Rapid Re-Housing Program (HPRP) activities, with a total grant amount of \$2,642,649. The HPRP HUD grant application was posted on the city's website and a public notice was placed in the Columbus Dispatch on April 29, 2009, which began a required 12 day public comment period. Citizens, public agencies and other interested parties had an opportunity to make public comments to the city on the HPRP grant application through May 11, 2009. On May 6, 2009, a public meeting through the Health, Housing and Human Services Committee was held where this substantial amendment and the proposed HPRP legislation was discussed. At the May 11, 2009 city council meeting, council did vote on and approve the HPRP legislation.

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

City of Columbus Response: No public comments were received during the public comment period.

- 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.**

City of Columbus Response: The City of Columbus did not receive any public comments during the public comment period.

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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: Non-Profit Subrecipient Intermediary Funding Organization (see description in Question #2 below)

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

City of Columbus Response: The City of Columbus and Franklin County are collaborating to fund HPRP initiatives that benefit the city and county. We have agreed to combine our allocations and work through the Rebuilding Lives Funder Collaborative (RLFC) and Community Shelter Board (CSB).

Created in 1986, CSB responds to the problem of homelessness in Franklin County. The founders include the City of Columbus, the Franklin County Board of Commissioners, the United Way of Central Ohio, The Columbus Foundation, the Greater Columbus Chamber of Commerce and others concerned about the quality of life in Franklin County. CSB is a non-profit intermediary organization that innovates solutions, creates collaborations, and invests in quality programs in order to end homelessness in Columbus and Franklin County. See www.csb.org.

The City establishes contracts and subrecipient agreements with CSB for administering City funds to eligible and qualified nonprofit service providers of homelessness prevention, emergency shelter, and supportive services for permanent supportive housing. Sources of City grant funds include Federal Emergency Shelter Grant, Community Development Block Grant funds, and City general funds.

CSB staffs both the City/County Continuum of Care Committee and the RLFC. The RLFC is a collaborative of local funders (city, county, public housing authority, philanthropic, etc.) committed to implementing the Rebuilding Lives Plan which calls for making emergency shelter available for all those in crisis and developing permanent housing linked to services for those with long-term needs.

[http://csb.org/files/docs/publications/2008/Community%20Summary%20\(final\).pdf](http://csb.org/files/docs/publications/2008/Community%20Summary%20(final).pdf)

The City of Columbus will award a subrecipient agreement to the Community Shelter Board in collaboration with Franklin County.

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- 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).**

City of Columbus Response: After HUD approval in July, the City will prepare legislation and the subrecipient agreement with Community Shelter Board (CSB). Legislation will be scheduled for City Council by July 27, 2009. Council approval authorizes the Department of Development to enter into a subrecipient agreement with the CSB.

CSB will then award subgrantees selected through a Competitive Request for Proposals (RFP) process called CSB Gateway - a new, simpler process for establishing partnership agreements developed by CSB. CSB has identified and eliminated redundant and burdensome processes. This new effort leverages available technology through CSB's website (see link <http://www.csb.org/?id=resources.money>). The updated application and comprehensive contracting process include all programs that receive CSB funding, adhere to RLFC requirements, and work for the local Continuum of Care funding process. Agencies will submit proposals via CSB Gateway for HPRP in July/August 2009 in order to have partnership agreements in place by September 30th. CSB will coordinate a Proposals Review Team. CSB is staffing the current planning process for the HPRP. Four Collaborative Planning Teams are planning HPRP initiatives and designing the RFPs for agencies to submit proposals. The teams include:

1. Coordinate Emergency Aid to Prevent Homelessness – United Way of Central Ohio/Franklin County Department of Job and Family Services
2. Adult System Improvement– Adult System Operations Work Group
3. Family System Improvement– Family System Operations Work Group
4. Homelessness Prevention for Persons with Mental Illness – ADAMH

- 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).**

City of Columbus Response:

The City staff of both the Finance and Management, and Development departments will work with Community Shelter Board to ensure that all HPRP initiatives comply with programmatic and regulatory guidelines.

a. Department of Finance and Management/Grants Management Office. Grants Management staff will assist in the administration of the Homelessness Prevention and Rapid Re-housing Program in a variety of financial and regulatory areas. Activities will include financial management, program monitoring, technical assistance, regulatory compliance, IDIS, eligibility issues and the preparation of required federal reports. Staff reviews City contracts and programs for compliance with HUD and City regulations. Staff also provides technical assistance to those responsible for monitoring compliance of the contracts.

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b. Department of Development Fiscal Office. Development Fiscal Office staff will assist in the administration of the HPRP in a variety of financial and regulatory areas. Activities will include financial management, and data entry in IDIS.

c. Department of Development Housing Division. Staff is responsible for generating an agreement with the Community Shelter Board, and for program and fiscal monitoring in coordination with the Grant Management Office and Development's Fiscal Office. Staff is responsible for the oversight and management of the subrecipient contract with CSB and its subgrantees.

Monitoring reviews will consist of:

- Ensuring programs and agencies are complying with fiscal and programmatic scopes of service;
- Conducting on-site visits to programs and agencies that receive HPRP funds;
- Ensuring that each program and agency is spending public funds in a prudent manner; and
- Providing advice on ways to secure superior services at minimum cost to the taxpayer.

d. Community Shelter Board. CSB has been administering funds to end homelessness in Columbus and Franklin County since 1986. Recently, CSB streamlined its application to foster quick and timely contracting for services and program implementation. CSB oversees effective use of funds through monthly and semi-annual reporting requirements. In addition, partner agencies are monitored through a program review and certification process that requires all agencies to adhere to a set of standards. The standards include compliance requirements mandated by funders as well as standards important to maintain client service, programmatic quality and health and safety standards.

CSB manages the homeless management information system (HMIS) named Columbus ServicePoint. HMIS is used to collect, monitor, and evaluate homeless and housing services in Columbus and Franklin County. Currently, 138 staff in 17 agencies are using HMIS to collect data for 48 homeless and housing related programs throughout Franklin County. Besides administering the HMIS for Columbus and Franklin County, CSB provides extensive HMIS related technical assistance for all agencies:

- Quarterly quality assurance checks
- HMIS administrator's trainings
- HMIS user trainings
- Agency trainings on HMIS HUD and locally required standards
- Need-based one-on-one technical assistance

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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).**

City of Columbus Response:

The City, County RLFC, and CSB established the following teams that will foster access to funding streams coming through ARRA.

a. Increase Access to Emergency Assistance, Benefits and Income

Provide immediate, systematic access to mainstream benefits and emergency assistance for persons who are homeless or at risk of homelessness. These persons benefit from stronger linkage to mainstream benefits and systems of care (Social Security, Medicaid, Veterans benefits, TANF, Food Stamps, Disability Assistance).

Team: United Way of Central Ohio, Franklin County Department of Job and Family Services, Emergency Food & Shelter Board, FirstLink (211 Helpline), Mid-Ohio Foodbank, Impact Community Action, Social Security Administration, Veterans Services Commission, ADAMH Board, Legal Aid Society, Mental Health Association, NAMI, COHHIO, State Benefits Bank Director, Columbus Coalition for the Homeless.

b. Increase availability of community resources to prevent homelessness.

Coordinate and expand community-based employment assistance and education programs. Jobs, and jobs with support, are key to preventing and eliminating homelessness.

Team: Franklin County Department of Job and Family Services, Bureau of Vocational Rehabilitation, ADAMH, Central Ohio Workforce Investment Corporation, Goodwill, mental health providers, Columbus Chamber of Commerce, Columbus State Community College, school boards, Labor unions.

c. Increase the supply of affordable rental housing.

The City is investing Neighborhood Stabilization Program and HOME funds in projects that will increase both the supply of rental housing affordable to low income persons and permanent supportive housing for people who are currently homeless.

Team: City of Columbus, local nonprofit and for profit developers, Continuum of Care, Rebuilding Lives Funder Collaborative.

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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).**

City of Columbus Response:

The Rebuilding Lives Funder Collaborative (RLFC), the Continuum of Care (COC) Committee and Community Shelter Board work in tandem on permanent supportive housing development in Columbus and Franklin County. The City of Columbus has representatives participating on both the RLFC and COC. Developing and maintaining housing that is affordable to low income persons is key to preventing and ending homelessness. The City and CSB will ensure that the COC committee and the following COC priorities are integrated into the HPRP initiatives:

- a. Collaboration with and accessing resources from community-wide service systems appropriate to the consumer population.**
- b. Collaboration with other parts of the continuum of care system, with particular emphasis on:**
 - Systematic linkage, advocacy and coordination among service providers
 - Avoiding duplication of existing community services and programs
- c. Reasonable costs to the community for the number of persons served and the type of housing and services being provided, with particular emphasis on:**
 - Maximizing the use of continuum of care resources currently in the community
 - Leveraging public, private and non-profit sector community resources
- d. Providing housing and services for those with the greatest needs and greatest difficulty accessing the current homeless service system, with particular emphasis on:**
 - Persons with special needs: mental health problems, substance abuse problems, HIV/AIDS, physical disabilities, veterans, elderly, and large families.
- e. Formulating individualized service delivery approaches that follow customers through the continuum of care.**
- f. Providing services to enable persons to successfully maintain permanent housing.**

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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).

City of Columbus Response:

The 2005-2009 Columbus and Franklin County Consolidated Plan (Con-Plan) builds upon several principles relevant to HPRP. The City of Columbus will apply these Con-Plan principles to its implementation of HPRP initiatives:

- **Priority to Lowest Income.** Ensure that no one is left behind, especially the poorest in our community.
- **Collaboration.** Encourage public, private and non-profit sector collaboration and reduce program duplication.
- **Leverage.** Leverage the involvement of private sector organizations and resources.
- **Measurable Results.** Produce and evaluate measurable outcomes and results.

The Con-Plan identifies housing affordability as *“the most significant housing problem in Columbus and Franklin County”*. The Con-Plan states, *“The greatest housing need is among the lowest income renter households”*. This leads to overcrowding and housing cost burdens greater than 30% of monthly income. These realities place individuals and families at risk of homelessness.

The HPRP provides resources to assist the City in meeting its Con-Plan goals and objectives that address homelessness prevention and re-housing. HPRP helps achieve or complement Plan objectives:

- “Maintain a Continuum of Care system that includes Homelessness Prevention resources as well as assistance to help families and individuals move from emergency shelters to transitional housing or permanent affordable housing.” (Table 55, Page 137)
- “Implement the Rebuilding Lives Initiative by funding non-profit organizations to develop and operate permanent housing for persons who have experienced long-term homelessness.” (Table 55, Page 137). The City is investing Neighborhood Stabilization Program and HOME funds to expand the supply of affordable rental housing through tax credit developments.

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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	\$263,837	\$834,714	\$1,098,551.00
Housing Relocation and Stabilization Services ²	\$602,803	\$555,627	\$1,158,430.00
Subtotal (add previous two rows)	\$866,640.00	\$1,413,830.00	\$2,256,981.00
Data Collection and Evaluation ³			\$253,536
Administration (up to 5% of allocation)			\$132,132
Total HPRP Amount Budgeted⁴			\$2,642,649

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.

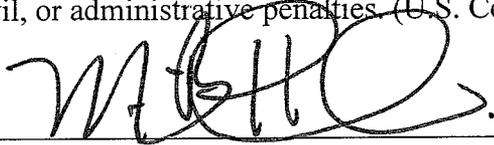
³Data collection and evaluation includes costs associated with operating HUD-approved homeless management information systems for purposes of collecting unduplicated counts of homeless persons and analyzing patterns of use of HPRP funds.

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)



Michael B. Coleman, Mayor
City of Columbus, Ohio

5/14/2009

Date