

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.hudhrc.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 Baton Rouge - Parish of East Baton Rouge
Name of Entity or Department Administering Funds	Office of Community Development (OCD)
HPRP Contact Person (person to answer questions about this amendment and HPRP)	Sharon C. St. Romain Toni Edwards
Title	Chief Social Services Officer Grants Manager
Address Line 1	P.O. Box 1471
Address Line 2	
City, State, Zip Code	Baton Rouge, Louisiana, 70821
Telephone	225-389-3039
Fax	225-389-3939
Email Address	sstromain@brgov.com tedwards@brgov.com
Authorized Official (if different from Contact Person)	Mukadas Alli-Balogun
Title	Assistant Urban Development Director
Address Line 1	P.O. Box 1471
Address Line 2	
City, State, Zip Code	Baton Rouge, Louisiana 70821
Telephone	225-389-3039
Fax	225-389-3939
Email Address	malli-balogun@brgov.com
Web Address where this Form is Posted	http://brgov.com/Dept/OCDplansreports.htm

Amount Grantee is Eligible to Receive*	\$ 1,734,745
Amount Grantee is Requesting	\$ 1,734,745

*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 citizen participation plan establishes the Citizens Advisory Council (CAC) to channel grassroots input into the consolidated planning process. Public hearings for the Consolidated Plan and Strategy and the annual Action Plans are held in conjunction with meetings of the CAC. For this proposed substantial amendment, the Office of Community Development (OCD) solicited comments from the public through CAC and public hearing forum. Members of the CAC and CoC were mailed an agenda with a notice of the planned public hearing. The public was notified by way of display advertisements in The Advocate and OCD website. The final public hearing will be held during the Metropolitan Council meeting on May 13, 2009; the Metropolitan Council will vote to approve submission of the HRHP amendment to the 2008 Action Plan.

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: The public comment period began April 2, 2009. Public comments were made via written submission and a general public hearing. During the public hearing on April 2, 2009, several comments were made by local non-profit agencies as well as members of the general public. The executive director of the lead agency of the CoC recommended that the majority of the funding should be allocated towards homelessness prevention and a smaller percentage for rapid re-housing. The executive director of the battered women's shelter stated that the number one issue with battered women is housing and that domestic violence victims should be considered in regards to homeless prevention. The City of Baton Rouge has taken into consideration the expertise of these and other agencies that have experience in operating homeless prevention and rapid re-housing programs. The consensus yielded many comments unanimously suggesting that funding emphasis is placed on homelessness prevention, and rapid re-housing a close second in priority.

All comments and views were accepted during this public hearing.

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The second and final public hearing will be held May 13, 2009 during the regularly scheduled Metropolitan Council meeting.

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) : City of Baton Rouge – Office of Social Services

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

Response: The City of Baton Rouge – Office of Community Development has decided to have a competitive request for proposal process for eligible non-profit organizations, in conjunction with designating the City of Baton Rouge - Office of Social Services, by way of an inter-agency agreement, to carry out a percentage of the eligible activities.

The competitive process entails the Office of Community Development advertising funds availability notices requesting proposals from non-profit organizations. In addition, all known current and past sub-grantees, as well as member organizations of the Capital Area Alliance for the Homeless (Baton Rouge CoC) are provided a written notice of availability of funding and proposal submission packages. OCD will also host a pre-submission conference for prospective applicants in which staff addresses any questions or concerns regarding the application package. After the pre-submission conference is complete, and the submission deadline has ended, an evaluation committee will rate/score the proposals according to a checklist of pre-determined criteria. Once the proposals are rated, the grants management staff will forward the recommendations through OCD administrators to the Mayor-President's Office.

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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 sub grantees by September 30, 2009, as required by the HPRP Notice (limit 250 words).

Response: Once HUD approves funding allocations, the subgrantee selection process and draft subgrantee contracts will have already been complete. The next step in the process will be the preparation of a HPRP Contracts Review package for submission to the City Parish Grants and Contracts Review committee, of which approval is required before any grant and/or contract is forwarded to the Metro Council. After approval is obtained from the Grant and Contracts Review committee, a project summary is forwarded to the Mayor President for review/approval, before the item is placed on the agenda for Metro Council approval.

Contractual agreements are mailed to subgrantees to be signed and returned for forwarding to the Mayor-President for final approval and signature. The budget is recorded by finance and a purchase order is obtained from the Purchasing Department, which is used to make any payments to individual subgrantees. A completely signed original is mailed to the subgrantee for their records accompanied by a notification letter that the grantee may begin expending funds as of October 1, 2009.

A grantee start up conference will be held to guide the subgrantee on how to administer the HPRP grant and technical assistance will be provided for the duration of this grant.

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 Office of Community Development is familiar with monitoring HUD funded programs. The monitoring is principally conducted by a series of desk reviews during the term of the project. Most drawdown requests are for reimbursement and must include the paid invoices. Staff reviews drawdown request documentation to determine eligibility, including verification that the costs were incurred during the contract period and after the environmental clearance, and monitors the rate of expenditure to encourage completion of the project within the allocated grant period.

Additionally, OCD performs an initial Risk Assessment to identify which subgrantees require comprehensive monitoring. According to the Risk Assessment, subgrantees are categorized according to the nature of the risk in grant performance it proposes. For an experienced subgrantee that has been successfully carrying out multiple activities, OCD could plan more narrowly focused monitoring.

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Even for subgrantees with strong past performance, OCD would still conduct periodic comprehensive monitoring. Subgrantees shall also submit periodic performance and evaluation reports to OCD as an additional method used to monitor and measure outcomes of provided services. Normally, effective and efficient subgrantees may begin to neglect their OCD responsibilities if accountability has not been built into the funding cycle.

Each OCD monitoring staff is familiar with the applicable HUD program rules and correct monitoring protocol. In preparation for the monitoring visit, the assigned monitor(s) should review all the written data on file at OCD.

OCD may wish to consider a “Pre-Monitoring Visit” to inform the subgrantee about our monitoring procedures and the information we will be examining during the subsequent monitoring (on-site) visit. This is an ideal time to identify apparent weaknesses in the subgrantee’s operations and suggest how they can be rectified before the formal monitoring visit. This will reduce the likelihood of negative “findings” after the formal monitoring.

There are five (5) steps to conducting any monitoring visit, that includes the notification letter, entrance conference, documentation, data acquisition and analysis, exit conference, and follow-up monitoring letter.

- 1) Begin the on-site monitoring process with a telephone call to explain the purpose of the monitoring and to arrange mutually convenient dates for the visit. Send a formal notification letter at least several weeks before the scheduled visit.
- 2) Conduct an Entrance Conference on-site with the subgrantee’s director and appropriate financial and program staff immediately before monitoring begins.
- 3) Keep a clear written record of the steps followed and the information reviewed during the on-site visit. Document any conversations with subgrantee staff.
- 4) At the end of the on-site visit, the monitoring team should meet again with key representatives of the subgrantee organization to present the tentative conclusions from your monitoring.
- 5) Use the Monitoring Letter to create a permanent written record of what findings during the on-site visit.

Following these basic monitoring procedures will ensure the effective and timely use of HPRP grant funds on eligible activities, as outlined in the HPRP Notice.

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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).

Response: The City of Baton Rouge-Office of Community Development will develop a partnership or a collaboration with the local community based social service agencies within the city, forming an alliance. It will address the local needs in the areas of housing/public housing, unemployment, employment/training, public assistance, in some cases health/healthcare, education, victims of domestic violence-battered/children/women, financial assistance, etc. The main focus will be to effectively utilize the homeless funds to those persons/individuals or families in the most need. The partnership of agencies will also provide support and stability services after assistance is given; to prevent homelessness from occurring again. Although, the Homelessness Prevention & Rapid Re-housing Program funds are short-term, their purpose is to help regain self-sufficiency and well-being among all concerned.

Individual agencies receiving Recovery Act funding will coordinate their respective services to provide assistance to HPRP clients. The Workforce Investment Administration of Baton Rouge (WIA) will be receiving funds under the American Recovery & Reinvestment Act of 2009. A large percentage of their allocation will be used to fund Summer Youth and Work Experience Programs. The remaining balance will be for employment/training for dislocated individuals. The WIA's job/skill readiness services will coincide with the services provided under the HPRP Program. In a similar fashion, the services provided by agencies such as the East Baton Rouge Parish School System, East Baton Rouge Parish Housing Authority, Office of Family Support, and the Louisiana Workforce Commission would be utilized in conjunction with HPRP activities.

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: The Office of Community Development is a member of the Continuum of Care. OCD will collaborate with the CoC to ensure that the strategies of the continuum's member agencies are aligned with the programs strategies for preventing and ending homelessness. Additionally, the collaboration has involved the CoC member agencies invitation to attend the public hearing for HPRP to offer their comments addressing funding, tracking clients, and outreach to assist with construction of the HPRP plan. Furthermore, CoC members were encouraged to comment on how to distribute the funding for the HPRP activities in a timely and efficient manner.

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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).

Response: According to OCD's Consolidated Plan and Strategy (CPS) 2005-2009, renter households with incomes ranging from no income to 50% of the MFI are in need of a full range of assistance including rental assistance and self-help programs or case management services. Also stated are the City-Parish's plans to continuously increase its efforts to develop additional affordable housing. An expanded supply of affordable housing would dually diminish homelessness and would decrease the length of time that individuals and families remain homeless. HPRP grant funds will serve as an additional resource towards this effort.

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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	\$625,809	\$336,974	\$967,988
Housing Relocation and Stabilization Services ²	\$417,206	\$224,624	\$645,325
Subtotal (add previous two rows)	\$1,043,015	\$ 561,624	\$1,604,639

Data Collection and Evaluation ³	\$ 43,369
Administration (up to 5% of allocation)	\$ 86,737
Total HPRP Amount Budgeted⁴	\$ 1,734,745

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.”

* **Administration** of 5% will be split between the City of Baton Rouge and the subgrantees.

The Office of Community Development will not increase the permanent position allocation for this grant.

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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

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