

Substantial Amendment to the Consolidated Plan 2008 Action Plan for the Homelessness Prevention and Rapid Re-Housing Program (HPRP) and Community Development Block Grant (CDBG-R)

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	Pinellas County
Name of Entity or Department Administering Funds	Pinellas County Community Development Department
HPRP Contact Person (person to answer questions about this amendment and HPRP)	Sheri Harris
Title	Planning Division Manager
Address Line 1	600 Cleveland Street, Suite 800
Address Line 2	
City, State, Zip Code	Clearwater, FL 33755
Telephone	727-464-8245
Fax	727-464-8215
Email Address	sharris@pinellascounty.org
Authorized Official (if different from Contact Person)	Calvin D. Harris
Title	Chairman, Board of County Commissioners
Address Line 1	315 Court Street, 5 th Floor
Address Line 2	
City, State, Zip Code	Clearwater, FL 33756
Telephone	727-464-3360
Fax	727-464-3022
Email Address	charris@pinellascounty.org
Web Address where this Form is Posted	http://www.pinellascounty.org/community

Amount Grantee is Eligible to Receive*	\$1,237,464
Amount Grantee is Requesting	\$1,237,464

*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 Substantial Amendment to the Action Plan was available to the public through advertisement in the *St. Petersburg Times* and on the Department's website on April 17, 2009. The public comment period was April 17-28, 2009. The Amendment included the plan for implementing the Homeless Prevention and Rapid Re-Housing Program (HPRP) and the additional funding for the Community Development Block Grant Program (CDBG-R).

Several collaborative meetings occurred throughout the planning process for implementation of the HPRP Program. Participants in the planning process included representation from the Homeless Leadership Network, Pinellas County Department of Health and Human Services, City of St. Petersburg, and United Way. The Homeless Leadership Network consists of membership from numerous entities, including other non-profit providers, and is responsible for the Continuum of Care process.

CDBG-R

The estimated funding allocation for CDBG-R was advertised in conjunction with the Notice of Funding Availability (NOFA) for the 2009-2010 Consolidated Submission for Federal, State and Local Housing and Community Development Programs. The NOFA was advertised in the *St. Petersburg Times* and posted on the Department's Website on February 27, 2009. The deadline for submission of applications was April 3, 2009. Projects considered for CDBG-R funding were construction projects that would be under contract and ready for construction within 120 days of availability of funds.

Homeless Emergency Project's Community Service Center for the Homeless was selected for CDBG-R funding. Dansville Phase Three Infrastructure Improvements and Joe's Creek Greenway Park have been selected as alternate projects should funding be available.

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.

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Response:

INSERT PUBLIC COMMENT SUMMARY.

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: The County will administer HPRP funds through their Health and Human Services Department, which currently provides rental assistance and has the capacity to distribute funding.)

CDBG-R

Competitive Process

Formula Allocation

Other (Specify:)

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

Response:

Key representatives of non-profit service providers provided input regarding the most efficient way to coordinate the distribution of funds. The providers included members of the Homeless Leadership Network, Health and Human Services Department, City of St. Petersburg, and administrators of the Food and Shelter Grant Program. Discussions focused on providing a unified approach to development of the Homeless Prevention Program throughout the County. Discussions concluded that Pinellas County Health and Human Services, who currently administers approximately \$9 Million in rental assistance for Pinellas County, has the capacity to distribute the funds in a timely and efficient manner.

CDBG-R

The applications, selection criteria and instructions were posted on the Department website. Projects that had completed the design stage were the priority projects for

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selection for funding. The projects needed to demonstrate the ability to be under contract within 120 days of funds being available.

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:

Upon approval of the substantial amendment for Pinellas County and a signed grant agreement, the County will enter into an agreement with Pinellas County Health and Human Services to secure their services for initial intake of applications, income eligibility processing, case management needs, and determination and distribution of financial assistance needed. Health and Human Services will request HPRP funds on a reimbursement basis from Pinellas County Community Development.

CDBG-R

Upon approval of the substantial amendment for Pinellas County and a signed grant agreement, the County will enter into an agreement with Homeless Emergency Project, Inc. for the construction of a Homeless Community Service Center. As required during the project selection process, the Project will be under contract within 120 days.

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:

Pinellas County, in collaboration with the City of St. Petersburg, intends to utilize HPRP funding for financial assistance, housing relocation and stabilization services, data collection, and administrative costs. Local data provided from the Homeless Management Information System (HMIS) and call center data from 2-1-1 Tampa Bay Cares, indicates that of the 3,664 calls received from Pinellas County residents in February 2009, utility and rent payment assistance ranked among the top five requests. Based on the documented need for Pinellas County, it is anticipated that funds will be expended within the first year. However, we will closely monitor activity through the IDIS Reporting System and if we are unable to expend funds in a timely manner, they will be allocated to another entity for distribution.

HPRP Funds will target prevention assistance to individuals and families at the greatest risk of becoming homeless and rapid re-housing assistance for persons who have recently become homeless. The budget summary estimates 50% of the financial assistance will target prevention assistance and 50% of the funds will target rapid re-housing assistance. Due to the limited amount of time participating jurisdictions have to commit the HPRP funds, adjustments to the proposed budget will not require an amendment to the plan.

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The program will include an initial case management assessment conducted by Health and Human Services to determine the amount and type of assistance that is required for the family to sustain housing. A Self Sufficiency Matrix will be one of the tools utilized to determine the level of case management needed. Section 8 Standards will be used as a guide for determining income eligibility for participants.

The maximum assistance that eligible households can receive through the program will be \$3,000 to provide three months of financial assistance. Eligible expenses associated with the financial assistance include rent payments, utility payments or security deposits. Participants will be evaluated for program eligibility as part of the initial intake process. This process will include verification of income eligibility and the amount of financial assistance needed to sustain or secure affordable housing. The maximum assistance provided for an applicant will be determined through a needs-based calculation and utilizing the Section 8 standards.

Pinellas County Community Development will require documentation that indicates the amount of financial assistance provided on behalf of the client and that the selected housing meets the housing standards requirement prior to processing reimbursement to Health and Human Services.

Health and Human Services will be responsible for collection of client data for entry into the HMIS reporting system. The data collection budget includes the cost to enter the data and additional costs for licenses and training.

CDBG-R

Pinellas County will follow our existing policies and procedures to ensure effective and timely use of CDBG funds as outlined in the Consolidated Plan. Grant agreements provide procedures for discontinuance due to lack of performance in a timely manner, pre-construction meetings are conducted, desk reviews are conducted to monitor monthly progress, and construction site visits are conducted as necessary throughout the construction process.

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 Pinellas County Health and Human Services Department has an existing network referral system with other providers in the County and with the Homeless Leadership Network, so coordination of resources already exists among the providers. In addition, data provided in the HMIS system allows us to track data to avoid duplication of services.

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For example, United Way participated in our planning sessions to provide information on the additional funding that they would be receiving through the Food and Shelter Grant Program. It is also important to incorporate the additional TANF dollars distributed through Department of Children and Families once they have determined the criteria for their additional funding. There is on-going communication with the Department of Children and Families and a representative from the Homeless Leadership Network has been in contact with the Department regarding the additional TANF dollars.

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 development of the Substantial Amendment for the Homeless Prevention and Rapid Re-Housing Program was completed in collaboration with Pinellas County Coalition for the Homeless, Pinellas Resources Subcommittee of Homeless Coalition (Continuum of Care for the Homeless), and Pinellas County Health and Human Services. The City of St. Petersburg participated in the program planning to develop a unified program between jurisdictions in order to meet the needs of families within Pinellas County.

Pinellas County Health and Human Services will be implementing the program and already has established outreach and networking efforts with the Pinellas Homeless Leadership Network. The Homeless Leadership Network has a broad representation of providers, including but not limited to, community leaders from business, service providers, formerly homeless persons, funding agencies, the Pinellas County Coalition for the Homeless, elected officials from the County, five major cities, and the Pinellas School Board.

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 Consolidated Plan was developed in conjunction with the Pinellas County Continuum of Care and its Homeless Coalition as part of the planning process. The priorities established in the Consolidated Plan include homeless prevention and targeting families with children. The HPRP grant funds will give priority to families that are about to become homeless, "but for" receiving the financial assistance. Documentation provided by 2-1-1 Tampa Bay Cares indicates there is an increased demand for assistance with rent payments and utility bill payments.

One of the specific goals in the Plan includes supporting activities to fill gaps in the Continuum of Care for the homeless and to respond to urgent community needs identified by specialized service agencies. The financial assistance provided to eligible applicants for the HPRP Funds will be coordinated with the 2008 Pinellas County Continuum of Services Discharge Planning Policies.

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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	\$ 549,008.00	\$ 549,008.00	\$1,098,016.00
Housing Relocation and Stabilization Services ²	\$ 28,787.40	\$ 28,787.40	\$ 57,574.80
Subtotal (add previous two rows)	\$577,795.40	\$577,795.40	\$1,155,590.80
Data Collection and Evaluation ³			\$ 20,000.00
Administration (up to 5% of allocation)			\$ 61,873.20
Total HPRP Amount Budgeted⁴			\$1,237,464.00

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.”

CDBG-R - Estimated Budget Summary

The proposed allocation for Pinellas County is \$809,226 for project implementation, less any allowable administrative costs.

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Prevention and Rapid Re-Housing Program (HPRP)**

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

Chairman, Pinellas County Board of County Commissioners
Title