

DRAFT
**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	City of Rochester
Name of Entity or Department Administering Funds	Department of Community Development
HPRP Contact Person (person to answer questions about this amendment and HPRP)	Bret Garwood
Title	Director of Development Services
Address Line 1	Bureau of Housing and Project Development
Address Line 2	30 Church Street, 028B
City, State, Zip Code	Rochester, New York 14614
Telephone	(585) 428-6150
Fax	(585) 428-6229
Email Address	garwoodb@cityofrochester.gov
Authorized Official (if different from Contact Person)	Robert J. Duffy
Title	Mayor
Address Line 1	City Hall, 307A
Address Line 2	30 Church Street
City, State, Zip Code	Rochester, New York 14614
Telephone	(585) 428-7045
Fax	(585) 428-6059
Email Address	duffy@cityofrochester.gov
Web Address where this Form is Posted	www.cityofrochester.gov

Amount Grantee is Eligible to Receive*	\$3,954,235
Amount Grantee is Requesting	\$3,954,235

*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 City of Rochester will follow the approved Citizen Participation Plan, as it applies to Amendments. A public notice regarding the availability of HPRP funds appeared in the Democrat and Chronicle newspaper on April 9, 2009. A public hearing will be held on May 12, 2009 at 8:00 PM, City Hall, 30 Church Street to obtain public comments and input.

The Substantial Amendment (HUD-40119) is available during the public comment period from April 9, 2009 to May 12, 2009 on the City of Rochester website at <http://www.cityofrochester.gov>. Copies of this document is available for review at Department of Community Development, City Hall 30 Church Street, Room 125 B, Rochester, NY 14614.

Special informational meetings sponsored by the City and County were held with key community stakeholders, including the Rochester/Monroe County Homeless Continuum of Care (CoC) and the Homeless Services Network (HSN); a network consisting of more than 60 organizations providing housing and/or services for the homeless. In addition, ongoing public input and guidance was provided from the Rapid Rehousing (RRH) Committee. The RRH was formed in January 2009 to develop a RRH model in our community that would include a central intake and common assessment process. In anticipation of the funds three joint planning meetings were held to prioritize and facilitate the development of the HPRP model.

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: A summary of the comments will be provide after the comment period which ends May 12, 2009.

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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 sub grantees. Note that a sub grantee is defined as the organization to which the grantee provides HPRP funds.

X Competitive Process

Formula Allocation

Other (Specify: _____)

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

Response: Based upon input and guidance from key homeless stakeholders discussed in Section B., data from our CoC Homeless Management Information System (HMIS) and interest received in advance of this Amendment, the County CDA is aware that the demand is strong and continuing to grow to address the homeless needs within our community. Therefore, requests for HPRP funds will likely exceed the amount available to both the County CDA and the City of Rochester.

Given the required spending plans of HPRP resources, the HPRP funds will only be obligated to organizations with the demonstrated capacity and expertise to address the areas of greatest need and that also ensure that projects can be implemented efficiently and successfully to address all program requirements within the statutory time frame.

To accomplish this, the County CDA plans to issue a joint County / City Notice of Funding Availability (NOFA) process on or about May 22, 2009 to solicit proposals for specific HPRP projects in the areas of greatest need. Priority will be given to the following eligible activities permitted under HPRP: Short-Term Rental Assistance; Housing Relocation and Stabilization Services; Housing Search Assistance; Mediation or Outreach to Property Owners; Case Management; and other Appropriate Homelessness Prevention and Re-Housing Activities. A special joint City/County HPRP Applicant Workshop will be conducted shortly after issuance of the NOFA.

Proposals will be due on or about June 22, 2009. This will allow applicants at least 30 days to develop proposals for the HPRP funding round. The proposal due date is subject to change based upon HUD's approval of this Amendment, and/or

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changes issued to the Notice or interpretation of the Notice as clarified on the HUD Homelessness Resource Exchange website at (www.hudhre.info) for this program.

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: A newly formed HPRP Review Committee consisting of representatives from the County CDA and DHS, City, CoC, HSN, United Way of Greater Rochester and RRH will evaluate and rank projects based on specific project evaluation criteria (HPRP Rating Forms) as developed by the Review Committee. The County CDA and City reserve the right to reject any application that does not meet requirements of the statute or fails to demonstrate the capacity to carry out the proposed activities in an effective and timely manner. Further, the County CDA and City reserve the right to contact individual applicants to submit additional information needed to make final determinations.

The anticipated HPRP application due date of June 22, 2009 will become effective after this Substantial Amendment due date, therefore, it is not possible to exactly predict or commit to specific allocations or specific uses of HPRP funds. However, input received from the key stakeholders and discussed in Section B.1. and interest obtained from potential HPRP applicants, helped substantially to establish the priority eligible activities described in the NOFA.

Based on competitive bids, the County CDA and City will award funds and/or enter into legally binding grant agreements with all sub grantees by September 30, 2009.

County and City payments will be made, respectively, to the subgrantees for eligible HPRP activities. Subgrantees may be paid in advance pursuant to procedures outlined in 24 CFR 84.22 for non-profit organizations and 24 CFR 85.21 for units of government. The County CDA, City, or sub grantees if applicable, will draw down funds at least quarterly from IDIS.

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: In accordance with the HPRP Notice (Docket No. FR-5307-N-01), the County CDA must obligate funds to their subgrantees by September 30, 2009. Pursuant to the Recovery Act, the spending plan stipulates that 60 percent of HPRP grant funds must be expended within two years of the date that funds become available to the County CDA and City for obligation (the date that HUD signs the grant agreement), and 100 percent of funds within three years of this date. As discussed in Section C.2., given the required HPRP spending plans for HPRP

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resources, HPRP funds will only be obligated to organizations with the demonstrated capacity to address the areas of greatest need and that possess the expertise to ensure that projects can successfully be implemented to address all program requirements within the statutory time frame.

All subgrantee HPRP Agreements will clearly define all spending plan requirements, program implementation plan, and the required performance measures (goals and outcomes) for all proposed prevention, diversion and re-housing activities. Subgrantees will be required to meet or exceed all performance measurements and document that the incomes of households served are at or below 50 percent of the Area Median Income (AMI), and are either homeless or at risk of losing housing as defined in detail in the HPRP Notice.

At a minimum, program oversight and monitoring of subgrantees will be conducted in accordance with the project monitoring and compliance procedures described in the approved County's Consolidated Plan. In addition, the joint City/County/CoC HPRP Team will develop a comprehensive HPRP monitoring reporting form to be consistently utilized during all subgrantee monitoring visits to be conducted by the County CDA and City.

All HPRP subgrantees will be required to participate in the CoC Homeless Management Information System (HMIS) for the purpose of collecting data and reporting on outputs and outcomes as required by HUD pursuant to the required data elements that will be collected in HMIS for HPRP as defined in the revised HMIS Data and Technical Standards.

Respectively, Quarterly Performance Reports will be submitted by the County CDA and City to HUD and will establish systems and internal controls in place that allow for separately tracking and reporting on Recovery Act funds as outlined in Section 1512 of the Recovery Act. An Initial Performance Report, which will cover the period between the grant agreement execution date and September 30, 2009 and which will serve as the first Quarterly Performance Report, will be provided to HUD in a timely manner prior to the due October 10, 2009 due date.

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: To most effectively utilize all resources, applicants will be encouraged to establish partnerships to integrate and coordinate programs within our community whenever possible.

The County CDA and City will collaborate with local agencies that can serve similar target populations which will receive additional funding under the American Recovery and Reinvestment Act of 2009:

- Emergency Food and Shelter Program (EFSP) Local Board: Since EFSP funds can be used for homelessness prevention, the grantee will work with the local board to ensure that this community maximizes funds available for prevention activities, and that the organizations funded with EFSP will use the same assessment and criteria for potential participants. Local EFSP allocations have not been announced at this time.
- Monroe County Department of Human Services (MCDHS): County CDA will meet with MCDHS once the guidelines are made available for the Temporary Assistance to Needy Families (TANF) Emergency Contingency Fund to maximize use of this funding to benefit households at risk of homelessness. MCDHS is an active member of the CoC Team
- Rochester City School District (RCSD): RCSD is very interested in playing an active role in outreach efforts to households that are doubled up and/or at imminent risk of homelessness and who would benefit from support to secure and stabilize permanent housing that would be the least disruptive to the education of children in the household.
- Rochester Works, Inc. (RWI): RWI, through its career center operations, will provide employment preparation services to clients of local agencies who are ready to pursue job search and employment. Services include job readiness training, skill development, career counseling, job search workshops and individualized job search assistance.

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 County CDA and City are active members of the CoC Team and are currently involved in planning efforts with the CoC Team and RRH Committee to develop a local model to ensure that HPRP funding is used efficiently and effectively to reduce the number of persons entering the homeless system and to move persons residing in emergency or transitional housing to permanent housing as quickly as possible. Homelessness prevention activities and rapid re-housing

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represent two of the three strategies identified in the CoC 's plan to end homelessness "Housing Options for All."

The CoC 's membership is diverse and includes representatives from the providers of mainstream resources, ie. – health care, entitlement benefits, education, etc. There are ten (10) ex-officio members of the CoC Team appointed by private and public organizations that were deemed necessary to have at the table to develop, maintain, monitor and continuously improve a comprehensive, flexible and coordinated continuum of care system of housing and services for homelessness in this community. These members represent: Monroe County Department of Human Services, Monroe County Office of Mental Health, Rochester/Monroe County Youth Bureau, Monroe County Department of Planning and Development - CDA; City of Rochester - Bureau of Youth Services and Department of CD, United Way, Rochester Housing Authority, and the HSN - two elected members from this consortium of more than 60 organizations and individuals providing housing and/or services to homeless populations in this community.

All HUD funded projects in the continuum are required to meet or exceed performance measurements in linking participants with mainstream resources. Planning work groups include both members of the CoC Team and the Homeless Services Network (HSN).

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: HPRP funds will be used in a manner consistent with the Homeless CoC Action Plan described in the Consolidated Plan. With increased resources for prevention services, funds will be used to reduce numbers of homeless persons by diverting at risk households from the homeless system.

Rapid Re-Housing funds will provide new resources to move homeless households to permanent housing quickly and provide short-term support services to ensure housing is stabilized, preventing future episodes of homelessness.

ESG activities which include eviction prevention, utility assistance and other emergency services by experienced providers are in and consistent with the 2008-09 Annual Action Plan of the Consolidated Community Development Plan. The allowance for these services are also included in the City's newly adopted Housing Policy.

We will continue to enhance our Discharge Planning Protocols Policy to reduce the numbers of homeless who have been discharged from publicly fund institutions or systems of care (such as health care facilities, foster care or other youth facilities, or correction programs and institutions), in order to prevent such discharge from

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immediately resulting in homelessness for such persons. However, persons who are being imminently discharged into homelessness from such publicly funded institutions are eligible to receive financial assistance or services through HPRP as long as they meet the minimum requirements as discussed in section D.2 of the HPRP Notice.

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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	\$843,421	\$618,508	\$1,461,929
Housing Relocation and Stabilization Services ²	\$843,420	\$1,443,186	\$2,286,606
Subtotal (add previous two rows)	\$1,686,841	\$2,061,694	\$3,748,535
Data Collection and Evaluation ³			\$8,000
Administration (up to 5% of allocation)			\$197,700
Total HPRP Amount Budgeted⁴			\$3,954,235

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)

The final amendment submitted to HUD will include the a signed and dated SF-424, a signed HUD-40119 (this form), and signed and dated General Consolidated Plan and HPRP certifications.

Signature/Authorized Official

Date

Title