



May 12, 2009

HPRP Substantial Amendment
Kattie Bond, Director
Department of Neighborhoods
City of Toledo
1 Government Center Ste 1800
Toledo OH 43604

Kattie,

Please accept these comments on the Substantial Amendment as presented.

“The President has made it clear that every taxpayer dollar spent on our economic recovery must be subject to unprecedented levels of transparency and accountability. He has identified five crucial objectives for Federal agencies, to ensure that:

- Recovery funds are awarded and distributed in a prompt, fair, and reasonable manner;
 - The recipients and uses of all recovery funds are transparent to the public, and that the public benefits of these funds are reported clearly, accurately, and in a timely manner;
 - Recovery funds are used for authorized purposes and every step is taken to prevent instances of fraud, waste, error, and abuse;
 - Projects funded under the recovery legislation avoid unnecessary delays and cost overruns; and,
 - Programs meet specific goals and targets, and contribute to improved performance on broad economic indicators. “
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Source: www.recovery.gov

In summary, we challenge this substantial amendment on the following grounds:

1) Misuse of Funds -

The amendment as outlined requests \$80,000 for the HMIS system the federal government has already fully funded.

We feel the answers to our spending questions regarding this line item were answered in a deceptive manner by the temporary part time director of TLC. She cited the need to buy hardware to access an HMIS system that only requires Internet access best exemplifies this deception. We feel buying TLC, EOPA, FOCUS, United Way computers to access the internet .

We feel attempting to use stimulus funds to finance a fully funded HMIS program is both waste and abuse. This money is better spent helping more households.

Potential Abuse: Also of concern is a rumored fee paid to the sub-grantee organizations of \$1100 per person served.

2) Clandestine Process

- a. Other cities solicited the input of service providers, advocates for the unhoused, and individuals at risk of losing their housing, and public comment in the design of the HPRP program. In Toledo, the temporary part time director of the lead organization responsible for the COC funds conducted private meetings with select individuals to design the program, which results in the proposed substantial amendment.
- b. No services providers, advocate or individuals, or even the full TLC Board of Directors has had input or been granted access to this proposed program, only being offered the generalized amendment for comment.
- c. When asked for the plan generated to support this proposed amendment, we were told both by the temporary part time director of TLC, as well as the City Department of Neighborhoods that no plan actually exists.
- d. Yet the proposed closed process selects only eight sub-grantees for distribution of the funds, rather than an open, competitive RFP/RFQ process to be used in many other cities. This limited source of distribution will prevent the funds from reaching those most in need through any other channels serving the unhoused, and those at risk of losing their housing. Such organizations included in other cities are Legal Aid, Fair Housing Center and faith-based outlets serving the most needy.
- e. The clandestine process used to develop this plan, as well as the plan to use these funds runs counter to the transparency demanded by the administration.

We ask the City of Toledo to:

1. Immediately release any supporting documentation used to create this substantial amendment. The asserted lack of existence of a plan would mean this amendment was put together without research, design or forethought, an unlikely scenario.
2. Ensure public and provider participation in plan to create the substantial amendment development — The Notice grants jurisdiction the option to shorten the citizen participation comment period on the “substantial amendment” to the Consolidated Housing Plan they will be preparing as a condition for receiving HPRP funds. We encourage you to utilize more generous comment periods as well as information gathering methods per the formal citizen participation plan. Like many other cities, we urge you to assure the substantial amendment has input in the provider, community member, unhoused, and people at risk or experiencing homelessness’ buy-in and support.
3. Target HPRP resources to poorest Americans — The Notice permits grantees to extend HPRP to individuals and families with incomes at or below 50 percent of AMI. We are

urging you to target HPRP services to individuals and families with the greatest need for prevention or rapid re-housing, utilizing the reach of existing organizations.

4. Assure Availability of Supportive Services — The Notice disqualifies most supportive services from eligibility for HPRP funding. Since supportive services are necessary compliments to rental assistance and housing relocation or stabilization services, we request that you identify and increase other sources of funding for supportive services targeted to HPRP recipients. For example, the Recovery Act infuses state and local workforce agencies with significant resources for employment and training services. ESG jurisdictions should describe in their HPRP substantial amendment how they plan to connect HPRP recipients to supportive services offered by workforce and other supportive services providers. We encourage the City to target specific resources to provide legal assistance to tenants living in units in foreclosure. All of these are evidence of the required collaboration component of the HPRP funds.
5. Supplement, rather than supplant, prevention funds —We encourage you to redirect the intended \$80k HMIS line item to services and commitments to people experiencing or at risk of homelessness, regardless of the absence of federal direction. Lacking the rule of law, we ask for the rule of common sense.
6. Assure Effective Project Selection and Monitoring – We encourage you to include in your substantial amendment a robust, transparent, competitive and public process to select the programs that are funded. The notice requires grantees to monitor HPRP activities sufficient for providing evidence of the effectiveness of the HPRP. We ask that 1Matters, on behalf of those who have experienced homelessness, and others at risk of becoming unhoused be a part of the monitoring process.

We think this is an important program that could save hundreds of families from becoming unhoused or return them to housing. It is our belief that as is, the substantial amendment runs risk of being denied. We believe these changes are appropriate and necessary to assure funding.

We thank you for your time and consideration.

Sincerely,

Ken Leslie
Executive Director
1Matters.org
419.349.4969