

## **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](http://www.hudhre.info)). HUD and its technical assistance providers will regularly update this site to include HPRP resources developed.

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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**

<b>Grantee Name</b>	City of Toledo
<b>Name of Entity or Department Administering Funds</b>	Department of Neighborhoods
<b>HPRP Contact Person</b> (person to answer questions about this amendment and HPRP)	Kattie M. Bond
<b>Title</b>	Director
<b>Address Line 1</b>	One Government Center
<b>Address Line 2</b>	Suite 1800
<b>City, State, Zip Code</b>	Toledo, OH 43604
<b>Telephone</b>	(419) 936-3647
<b>Fax</b>	(419) 245-1413
<b>Email Address</b>	kattie.bond@toledo.oh.gov
<b>Authorized Official</b> (if different from Contact Person)	Carleton S. Finkbeiner
<b>Title</b>	Mayor
<b>Address Line 1</b>	One Government Center
<b>Address Line 2</b>	Suite 2200
<b>City, State, Zip Code</b>	Toledo, OH 43604
<b>Telephone</b>	(419) 245-1001
<b>Fax</b>	(419) 245-1370
<b>Email Address</b>	mayor.toledo@toledo.oh.gov
<b>Web Address where this Form is Posted</b>	www.toledo.oh.gov

<b>Amount Grantee is Eligible to Receive*</b>	<b>\$3,275,494</b>
<b>Amount Grantee is Requesting</b>	<b>\$3,275,494</b>

\*Amounts are available at <http://www.hud.gov/recovery/homelesspreventrecov.xls>

## **Substantial Amendment to the Consolidated Plan 2008 Action Plan for the Homelessness Prevention and Rapid Re-Housing Program (HPRP)**

### **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 Toledo conducted internal discussions within the Department of Neighborhoods (DON) to assess the context of the Homelessness Prevention and Rapid Re-housing Program (HPRP) grant. It coordinated a meeting with local community organizations, including the Continuum of Care's lead organization, the Toledo Lucas County Homelessness Board to best ascertain how to implement a process for the allocation of funds through the City of Toledo and potential partners. Other task force members consisted of the United Way of Greater Toledo, Lucas County Job and Family Services, Lucas County Workforce Development, Economic Opportunity Planning Association of Greater Toledo, and Veteran's Service Commission. The goal was to receive input as to the best way to coordinate and distribute funds, while utilizing other entities and leveraged services. Discussions also centered on the best way to implement programs and track results so as to provide a thorough accounting to the Department of Housing and Urban Development (HUD). These task force meetings provided the City of Toledo with viable options to implement and undertake a successful process.

The City of Toledo prepared a draft of the Substantial Amendment to the 2008-2009 One-Year Action Plan for public comment. On May 1, 2009, and for 12 consecutive days, all citizens and interested parties within the community had the opportunity to comment on the proposed plan for implementing the plan. The City of Toledo accepted all public comments as to the substantial amendment.

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 City of Toledo received five public comments as it related to the HPRP. The comments are summarized below:

- Toby Fey, Advocates for Basic Legal Equality, Inc. (ABLE) sought further clarification as to how the current lack of free legal representation in private landlord eviction proceedings would be addressed through the HPRP grant.

## **Substantial Amendment to the Consolidated Plan 2008 Action Plan for the Homelessness Prevention and Rapid Re-Housing Program (HPRP)**

ABLE had been informed through the Toledo Lucas County Homelessness Board (TLCHB), which is part of the City of Toledo / Multi-Agency Task Force, that a proposal of \$100,000 was to be dedicated to legal services and mediation, but it was unclear how the money would be expended.

- Dan Rogers, Cherry Street Mission opined on three elements of the amendment: case management, capacity, and ability to collect data. He felt that the community does not possess the necessary capacity to provide rapid delivery of services, and thus does not have the necessary competencies in case management. As to capacity, he doesn't feel the entities identified have adequate capacity "to handle both the need and money prescribed and solicited to meet the need". His last comment suggested, "our aim is to meet the need we can see, not the need that has been forecasted by the utilization of a more careful and rigorous analysis of the need".
- Christal Hughes, Haven Homes Transitional Systems provided four comments; 1. Questioned the reimbursement process as possibly presenting cash flow problems, especially as it related to rental subsidies; 2. Questioned the electronic-wire transfer process proposed by the City of Toledo as impractical and requesting more flexibility to ensure that the needs of the target population and agencies involved would be met in a timely method; 3. Proposed including more access points to make the project more user-friendly and accessible to more individuals, and also to ensure individuals are engaged with service providers who can offer mainstream resources; and, 4. Requested that the Re-entry Coalition of Northwest Ohio be included on the taskforce as they service an underserved population: ex-offenders.
- Scott Sylak, Lucas County Treatment Alternatives to Street Crimes (TASC) reiterated much of the same sentiment as Ms. Hughes, but in regards to the reimbursement process causing cash flow problems (1.), suggested a process that allowed for funds to be advanced in specified cases; and for proposed access points (3.), recommended that the Ohio Benefit Bank be included as it would be more beneficial for their target population: ex-offenders, which works with the institutional staff prior to an inmate's release. As a final comment, he inquired as to whether a billing mechanism was yet established for intake costs.
- Ken Leslie, TLCHB Member, had several questions as to the content of the HPRP grant, summarized as following: 1. Extent of Continuum of Care (CoC) meetings to develop the HPRP, dates and times of meetings, and how were committee members selected, including any homeless representatives; 2. Membership of the Toledo/Multi-agency Taskforce and times of meetings; 3. What HMIS data was used to identify underserved populations; 4. Which agencies are receiving funds, what are the proposed allocation for each category of funding, how will data collection funds be utilized, and where will administrative costs be expended. Although Mr. Leslie recognizes that HMIS is a legitimate and eligible expense, he opined, "the money is better spent helping the people it was intended to help".

**Substantial Amendment to the Consolidated Plan 2008 Action Plan for the Homelessness Prevention and Rapid Re-Housing Program (HPRP)**

**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 Toledo / Multi-Agency Task Force)

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

Response: To identify and select subgrantees, the City of Toledo formed a multi-agency/government task force to identify existing community agencies that had the capacity to undertake the activities under HPRP. During this process, the Taskforce identified three crucial criteria to ensure the success of the HPRP: case management required under the Housing Relocation and Stabilization Services; capacity to provide rapid delivery of services and funding for HPRP; and the ability to input data collection into the Homeless Management Information System (HMIS). The agencies identified as potential subgrantees through this process have the capacity and ability to incorporate HPRP services into existing programs, minimizing staff costs and allowing for funding to go toward direct services. They were also selected because of their leadership in using a "Housing First" model and utilizing the Self-Sufficiency Matrix Assessment Tool in placing persons in permanent housing. These criteria provided a process of selection of agencies that could participate in the HPRP. They are Toledo Lucas County Homelessness Board (TLCHB), United Way of Greater Toledo, Family Outreach Community United Services (FOCUS), Economic Opportunity Planning Association of Greater Toledo (EOPA), Lucas County Treatment Alternative to Street Crimes (TASC), Veteran's Service Commission, Neighborhood Properties, Inc. (NPI), and Catholic Charities. Other providers may be selected based upon the above criteria.

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: Toledo City Council passed Ordinance number 176-09 on April 9, 2009, accepting the \$3,275,494 HPRP grant and allowing for the Mayor and the Department of Neighborhoods to enter into any necessary contract with subgrantees and encumber funds allocated to subgrantees immediately upon

## **Substantial Amendment to the Consolidated Plan 2008 Action Plan for the Homelessness Prevention and Rapid Re-Housing Program (HPRP)**

approval of the HPRP substantial amendment. Funding will be allocated to subgrantees based upon verification of eligible direct services provided to persons within the HPRP. To expedite funds to the subgrantees, the DON will work with the city's Finance Department to set up wire transfers to subgrantees within 24-48 hours of subgrantee requests.

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 key proposed staff positions within the City of Toledo, DON who will ensure effective and timely use of HPRP grant funds on eligible activities are: Program Manager, Administrative Services, Administrative Analyst IV, Program Monitoring Specialist, Neighborhood Development Specialist, Relocation Officer, and Intermediate Account Clerk. These key staff is assigned within the City's Divisions of Housing and Administrative Services. The Adm. Analyst IV will be responsible for the day-to-day operations of the HPRP grant, including overall implementation, planning, gathering and review of records and review of HMIS and IDIS reporting, supervision of financial, clerical activities, and monitoring of subgrantees.

The Adm. Analyst IV will oversee all program activities utilizing spreadsheets which track expenditures, progress of activities, HMIS and IDIS reports. The Administrative Analyst IV and Program Monitoring Specialist will meet weekly with the Manager of Administrative Services to review project activities/outputs and benchmarks. The Manager of Administrative Services will monitor and review the activities of the City of Toledo staff to insure that the City's HPRP administrative funds are documented and utilized as required. The Program Monitoring Specialist will meet monthly with subgrantees to insure that eligible activities are properly documented and guidelines are adhered to. The DON staff will meet quarterly with the HPRP Task Force to report on program progress, discuss impediments, strategize and brain storm on post-grant activity.

Funding will be allocated to subgrantees based upon verification of eligible direct services provided to persons within the HPRP. Subgrantee draw requests will be verified by the Program Monitoring Specialist and processed by an Intermediate Account Clerk at the City of Toledo. To expedite funds to the subgrantees, the City of Toledo, DON will work with the City's Finance Department to set up wire transfers to subgrantees within 24-48 hours of subgrantee requests. This process of wire transfers will insure that 60% of HPRP funds are drawn down within two years and all funds are expended within three years of HUD signing the grant agreement.

## **Substantial Amendment to the Consolidated Plan 2008 Action Plan for the Homelessness Prevention and Rapid Re-Housing Program (HPRP)**

### **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 Toledo formed a multi-agency/government task force to collaborate with agencies that received funds under the American Recovery and Reinvestment Act of 2009 (ARRA) from other Federal agencies. The task force included the Lucas County Commissioners, Lucas County Jobs and Family Services, Lucas County's (The Source) employment agency, United Way of Greater Toledo, Veterans Service Commission, and Toledo Lucas County's Homelessness Board and Continuum of Care (CoC). The task force took inventory of populations currently being served, existing funding and new funding available from ARRA of 2009. The CoC, through the HMIS, along with the other task force members, provided their available data to determine where there were underserved populations. Agencies in the City of Toledo primarily serve families. Underserved populations included but are not limited to: single individuals, ex-offenders, married couples without children, persons exiting shelters, and families living in at-risk housing in the Toledo Public School District (TPS). The City identified a significant number of individuals and families living in and renting units undergoing pre- or post-foreclosure. To coordinate a request for assistance, the task force determined that United Way's 211 would be utilized as the initial centralized intake for HPRP referrals. Utilizing United Way's 211 will allow the HPRP to co-exist with mainstream resources such as Temporary Assistance to Needy Families (TANF). United Way's 211 would refer individuals and families to the appropriate agencies selected as subgrantees listed in Section C2, depending upon their case management expertise.

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 City of Toledo wants to ensure that its undertaking of the HPRP grant coincides and complements the CoC and TLCHB's Community Alliances and Strategic Efforts (CASE) Plan. The Toledo Lucas County Homelessness Board (TLCHB) through the CoC of which the City of Toledo is a member of both organizations, identified programs and resources to further the goal of ending homelessness, including homeless prevention. This goal identifies households at imminent risk of losing housing, persons exiting shelters, and persons released by

## **Substantial Amendment to the Consolidated Plan 2008 Action Plan for the Homelessness Prevention and Rapid Re-Housing Program (HPRP)**

public institutions without permanent housing placement as those most in need of support. Those underserved persons were also identified by the HPRP task force.

Collaboration will include the following:

- United Way 211 will house initial in-takes allowing HPRP to exist with other mainstream programs such as TANF.
  - TPS, reports a high percentage of elementary school students who live in at-risk housing, transfer during the school year, which has an adverse academic affect on the students. The housing is at risk due to a variety of reasons, including sub-standard housing. United Way grant funds will leverage HPRP funds that directly assist families with rental at-risk housing. Children who reside in those units can remain in housing within that specific school's service area.
  - Other agencies the City of Toledo will collaborate with who are or will be members of the CoC include: FOCUS, EOPA, Lucas County TASC, Veteran's Service Commission, NPI, and Catholic Charities. They will provide case management services to the underserved populations.
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 City of Toledo' 5-year Consolidated Plan was adopted on May 13, 2005. The City's 5-year Consolidated Plan on page 126 identifies Goal B.2 Ending Chronic Homelessness. Under this goal strategies for Prevention are outlined including utilization of HMIS, and maximizing partnerships with existing mainstream community resources. The City of Toledo's HPRP as described in sections D1. and D2. is consistent with the City's 5-year Consolidated Plan. Many of the subgrantees are receiving other ARRA funds and the City's HPRP will compliment and leverage those other funding sources through direct assistance.

**Substantial Amendment to the Consolidated Plan 2008 Action Plan for the Homelessness Prevention and Rapid Re-Housing Program (HPRP)**

**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.

<b>HPRP Estimated Budget Summary</b>			
	<b>Homelessness Prevention</b>	<b>Rapid Re-housing</b>	<b>Total Amount Budgeted</b>
Financial Assistance <sup>1</sup>	\$ 1,600,000.00	\$ 756,719.30	\$ 2,356,719.30
Housing Relocation and Stabilization Services <sup>2</sup>	\$ 459,000.00	\$ 216,000.00	\$ 675,000.00
<b>Subtotal</b> (add previous two rows)	<b>\$ 2,059,000.00</b>	<b>\$ 972,719.30</b>	<b>\$ 3,031,719.30</b>
Data Collection and Evaluation <sup>3</sup>			\$ 80,000.00
Administration (up to 5% of allocation)			\$ 163,774.70
<b>Total HPRP Amount Budgeted<sup>4</sup></b>			<b>\$ 3,275,494.00</b>

<sup>1</sup>Financial 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.

<sup>2</sup>Housing 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.

<sup>3</sup>Data 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.

<sup>4</sup>This amount must match the amount entered in the cell on the table in Section A titled “Amount Grantee is Requesting.”

**Substantial Amendment to the Consolidated Plan 2008 Action Plan for the  
Homelessness 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)

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Signature/Authorized Official

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Date

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Title