

**Draft 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>	Oakland County, Michigan
<b>Name of Entity or Department Administering Funds</b>	Oakland County Community & Home Improvement
<b>HPRP Contact Person</b> (person to answer questions about this amendment and HPRP)	Karry L. Rieth
<b>Title</b>	Manager
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<b>City, State, Zip Code</b>	Pontiac, MI, 48341-0414
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<b>Fax</b>	(248) 858-5311
<b>Email Address</b>	riethk@oakgov.com
<b>Authorized Official</b> (if different from Contact Person)	L. Brooks Patterson
<b>Title</b>	County Executive
<b>Address Line 1</b>	250 Elizabeth Lake Rd Suite 1900
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<b>City, State, Zip Code</b>	Pontiac, MI, 48341-0414
<b>Telephone</b>	(248) 858-5403
<b>Fax</b>	(248) 858-5311
<b>Email Address</b>	riethk@oakgov.com
<b>Web Address where this Form is Posted</b>	<a href="http://www.oakgov.com/chi">http://www.oakgov.com/chi</a>
<b>Amount Grantee is Eligible to Receive*</b>	<b>\$1,553,232.00</b>
<b>Amount Grantee is Requesting</b>	<b>\$1,553,232.00</b>

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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 Oakland County Citizen Participation Plan states that the County shall amend its Consolidated Plan whenever it makes a substantial change in the method or distribution of funds, carries out an activity using funds from any program covered by the plan not previously described in the action plan, or substantially changes the scope, purpose, location, or beneficiaries of an activity. Although the funding allocation is based on the Emergency Shelter Grant (ESG) program, the Homelessness Prevention and Rapid Re-Housing Program (HPRP) is a separate program, with a different program purpose and requirements. Therefore it is considered a substantial amendment to the Oakland County Consolidated Plan 2008 Action Plan.

HPRP regulations require Oakland County to follow its citizen participation plan in accordance with 24 CFR part 91, except that the minimum period for citizens to comment on the substantial amendment is reduced to 12 days. The County advertised a public hearing on April 10, 2009 in the Oakland Press - newspaper of general local circulation, on the Oakland County Taskforce on Homelessness and Affordable Housing list serve – to over fifty service agencies, and on the County website. The public hearing was held Thursday, April 23 at the Oakland County Executive Conference Center - an accessible facility. The hearing opened at 1:40 p.m. and closed at 2:05 p.m. Seven Continuum of Care, non profit, and local community representatives attended. The citizen comment period for the HPRP substantial amendment to the Oakland County Consolidated Plan 2008 Action Plan expired on May 5, 2009.

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: Several attendees of the public hearing on the Substantial Amendment to the Consolidated Plan 2008 Action Plan for the Homelessness Prevention and Rapid Re-Housing Program (HPRP) offered comments. The comments addressed the requested concept papers, eligible use of HPRP funds, allocation process, need for foreclosure prevention resources, flexibility of the program, public awareness needs, referral requirements, and next steps in the process. All public comments from the public hearing were accepted. No additional citizen comments were received from April 24 - May 5.

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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 subgrantees. Note that a subgrantee is defined as the organization to which the grantee provides HPRP funds.

- Competitive Process
- Formula Allocation
- Other (Specify: \_\_\_\_\_)

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

Response: Oakland County held a Homelessness Prevention and Rapid Re-Housing Program (HPRP) focus group meeting on April 13, 2009 attended by Oakland County Taskforce on Homelessness and Affordable Housing member agencies. The group discussed HPRP opportunities, evaluated the proposed homelessness risk factors, and apportioned percentages to each eligible activity on the budget sheet provided.

The County will use available administration funds to provide program oversight and management and a request for proposal process to allocate homeless prevention and rapid re-housing funds to non-profit agencies. The Oakland County HPRP will be based upon the end location desires of eligible clients. Since the cities of Pontiac and Royal Oak will receive direct HPRP allocations the Oakland County program will provide services in the remaining fifty nine communities. The County will explore contract options with the current HMIS provider to serve the data collection and evaluation needs of HPRP.

To complete the Substantial Amendment to the Consolidated Plan 2008 Action Plan a concept paper process was developed. The concept papers were used to develop this application and to ascertain which organizations had the capacity and interest in providing services through a future request for proposals process. The request for concept papers was advertised on April 16<sup>th</sup> in the Oakland Press, on the Oakland County Taskforce on Homeless and Affordable Housing list serve, and on the Oakland County website with a due date of April 21<sup>st</sup>. The concept paper design followed the HPRP application requirements and included a proposed estimated budget for each eligible activity.

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

Response: In order to receive HPRP funding, Oakland County must ensure that its complete application is postmarked to HUD no later than May 18, 2009. Oakland County will provide HUD with two hard copies of the complete substantial amendment to the Consolidated Plan 2008 Action Plan for the HPRP along with the required SF-424 form and certifications. Oakland County will continue to post substantial amendment information on the Community & Home Improvement Division website at <http://www.oakgov.com/chi> as materials are developed, published, and submitted to HUD.

By July 3, the County plans to send a request for proposals to the eight agencies that submitted concept papers. The request for proposals will also be advertised in the Oakland Press - newspaper of general local circulation, on the Oakland County Taskforce on Homelessness and Affordable Housing list serve – to over fifty service agencies, and on the County website. Once the request for proposals advertisement and application process phases are complete Oakland County staff will review and evaluate each proposal based upon a scoring methodology. A series of agency interviews with Division staff will also address specific program design, budget request, collaboration, and service area requirements. The County will complete the request for proposals procurement process by the time HUD signs the HPRP grant agreement. Two year contracts will not be awarded and signed with successful agencies until after HUD and Oakland County sign the grant agreement. Oakland County will award or enter into legally binding grant agreements with all subgrantees by September 30, 2009.

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 statutory deadline for expenditure of HPRP funds begins when the grant agreement is signed by HUD. Only HPRP eligible activities will be funded through subgrantee awards and contracts. Two year contracts will be executed to ensure timely expenditure. HUD requires that Oakland County draw down HPRP funds at least quarterly from the Integrated Disbursement and Information System (IDIS). The County will draw down from IDIS 60 percent of its HPRP grant funds within 2 years of the date that HUD signed the grant agreement, and 100 percent of funds within 3 years of this date. No funds will be drawn down from IDIS after the 3-year expenditure deadline.

The Oakland County Community & Home Improvement Division will administer the use of HPRP funds. Administrative funds will be used to hire an existing County employee on a part time basis to serve as a HPRP Coordinator. The Coordinator will provide program oversight and management, and monitor the data collection and evaluation needs of HPRP through a contract with the current Continuum of Care HMIS provider. The County will use a request for proposal process to allocate homeless prevention and rapid re-housing funds to non-profit agencies.

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Oakland County is responsible for monitoring all HPRP activities, including activities carried out by a subgrantee, to ensure that program requirements established in the HPRP Notice and any subsequent guidance are met. Oakland County will use monitoring procedures described in the 2005-2009 Consolidated Plan. The Community & Home Improvement Division is responsible for managing day-to-day operation of community planning and development grant programs to ensure that activities are implemented and funding is spent in accordance with program requirements. The monitoring program remains effective through regular tailoring to meet the needs of specific projects or activities. The Division offers ongoing technical assistance and is required to maintain files and records in accordance with specific program requirements and good business practice.

The Consolidated Plan requires that Oakland County maintain information and records relating to program activities and expenditures for a period of at least seven years. HUD has the right to access these records. Citizens, public agencies and other interested parties have the right to timely and reasonable access to program records as described in the Citizen Participation Plan, consistent with applicable federal and state laws regarding privacy and confidentiality. As a recipient of Emergency Shelter Grant (ESG) funds the County conducts monitoring reviews to ensure compliance with federal regulations and to make sure that each program meets mandated performance standards. Monitoring procedures under the Emergency Shelter Grant (ESG) include technical assistance to agencies on federal requirements regarding audit, purchasing, and administration during the application process. Staff meets with all new shelter directors for a program orientation. Staff will also meet with shelter directors on request to resolve program-related issues. A spending performance review occurs at the time of reimbursement. County staff will address concerns and the ESG program is subject to audit by outside firms. HPRP monitoring practices at a minimum will follow existing ESG procedures.

### **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: By working in concert with other agencies receiving HPRP and other funds under the American Recovery and Reinvestment Act of 2009, the County and its subgrantees will access a range of resources to best meet the assessed short and longer term needs of persons seeking assistance. In that the needs are so great, subgrantees will continue to collaborate with local agencies to meet the extensive needs of clients as well as for families and individuals in danger of becoming homeless.

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Successful subgrantees will continue to collaborate with agencies including:

- Common Ground (emergency crisis assistance)
- HAVEN (domestic violence)
- Easter Seals, Community Network Services, and TTI (mental health)
- Lighthouse of Oakland County (family assistance)
- Oakland Family Services (family assistance)
- Oakland Livingston Human Service Agency (family assistance)
- South Oakland Shelter (homeless shelter)
- Oakland County Department of Human Services (family assistance)
- Community Housing Network (housing for special needs and others)

Clients who have a history of substance abuse will be served by community providers who contract with the Office of Substance Abuse Services including Community Programs, Inc. (substance abuse). For families with school-aged clients, subgrantees will continue to partner with Oakland County Schools and the Homeless Student Education program to ensure their needs are met. Through intensive case management services clients will be linked to other providers in the community as well as utilize mainstream resources such as food stamps, Medicaid, Supplemental Security Income, substance abuse treatment and prevention and the Family Independence Program (FIP).

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: Oakland County Community & Home Improvement has strong working relationships with various Continuum of Care agencies. Subgrantees will be expected to actively participate with the Oakland County Taskforce on Homelessness and Affordable Housing (OCTHAH) and work collaboratively with agencies within the Continuum of Care to make services available. Collaborative efforts will include receiving referrals, sharing resources and information, and working with case managers from other agencies to develop systems of care. All participants and referrals will come from emergency shelter facilities, hospitals, Oakland Schools, law enforcement, and other social service and housing providers.

To meet the extensive needs of clients and provide continued support, subgrantees will also collaborate with OCTHAH member agencies including the Oakland County Community Mental Health Authority and its provider agencies Training & Treatment Innovations, Community Housing Network Services, Common Ground Sanctuary, and Easter Seals of Southeast Michigan.

In an effort to maintain strong systems of care, clients will be linked to mainstream resources including food stamps, McKinney Vento Homeless Act recipients, Medicaid, Family Independence Program (FIP), Social Security Income, and substance abuse treatment and prevention programs. Other mainstream programs will be monitored by the County and subgrantees so that agencies may reach out to avoid duplication and enhance services.

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Subgrantees will have to be in direct contact with each other to assure that duplication does not occur and that the homeless receive the maximum benefit from HPRP funds. Discussions among Continuum of Care agencies have already begun planning how HMIS may be used to enhance collaboration.

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 County's most recent Consolidated Plan. Under Homeless Prevention Goal #1 funds will be used to provide housing and utility assistance so clients will be able to concentrate on other self-sufficiency needs such as health care and groceries. Intense case management including a comprehensive discharge plan and follow-up will ensure that ongoing support and resources provide clients with the greatest opportunity to succeed.

Family Homelessness Category Goal #1 Prevention - HPRP funds will provide strong support to those at risk of losing housing and clients transitioning from institutions and shelters. Goal #2 Intervention - Case management teams will have individualized plans that provide a comprehensive set of interventions to ensure that unmet needs are met and clients are quickly transitioned back into housing units.

Case managers will provide those that receive assistance with adequate resources, tools, and support they need to have a smooth, sustainable and quick transition from homelessness. Goal #3 Retention - HPRP funds will be allocated to qualifying clients for short-term housing and utility assistance to prevent a relapse into homelessness.

Under the Chronic Homeless Category: Goal #3 Employment Resources - Case Managers will continue to provide resources including resume writing, employment search, job training, job placement, and bus transportation. Subgrantees will continue to actively strengthen job placement links. Goal #4 – Supportive services: All clients who transition from homelessness to housing will continue to receive ongoing comprehensive case management services to the extent they receive monetary support.

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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.

<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>	\$282,378.00	\$662,609.00	\$944,987.00
Housing Relocation and Stabilization Services <sup>2</sup>	\$95,058.00	\$357,865.00	\$452,923.00
<b>Subtotal</b> (add previous two rows)	<b>\$377,436.00</b>	<b>\$1,020,474.00</b>	<b>\$1,397,910.00</b>
Data Collection and Evaluation <sup>3</sup>			\$77,661.00
Administration (up to 5% of allocation)			\$77,661.00
<b>Total HPRP Amount Budgeted<sup>4</sup></b>			<b>\$1,553,232.00</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.”

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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

\_\_\_\_\_  
Signature/Authorized Official

\_\_\_\_\_  
Date

\_\_\_\_\_  
Title