

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	Cobb County, GA
Name of Entity or Department Administering Funds	Cobb County CDBG Program Office
HPRP Contact Person (person to answer questions about this amendment and HPRP)	Nick Autorina
Title	Managing Director
Address Line 1	127 Church Street
Address Line 2	Suite 270
City, State, Zip Code	Marietta, GA 30060
Telephone	770-528-4600 x227
Fax	770-528-4613
Email Address	nick.autorina@cobbcounty.org
Authorized Official (if different from Contact Person)	Samuel S. Olens
Title	Chairman, Board of Commissioners
Address Line 1	100 Cherokee Street
Address Line 2	Suite 300
City, State, Zip Code	Marietta, GA 30060
Telephone	770-528-3305
Fax	770-528-2606
Email Address	solens@cobbcounty.org
Web Address where this Form is Posted	www.cobbcountyga.gov/cdbg/

Amount Grantee is Eligible to Receive*	\$ 1,337,048.00
Amount Grantee is Requesting	\$ 1,337,048.00

*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:

Cobb County published a draft HPRP Substantial Amendment to Cobb County's FY 2008 Action Plan that was posted on Cobb County's Web Site on Friday, April 3, 2009. On Wednesday, April 8, 2009, a Public Hearing was held to discuss HPRP implementation in Cobb County. On Friday, April 17, 2009, the HUD Public Comment period ended for this Action Plan Amendment. As such, Cobb County exceeded the Public Comment period to ensure full transparency and accountability with a 15-day public comment period versus a 12-day public comment period requested by HUD.

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:

“We are excited about the new opportunities this funding brings and look forward to working with the other organizations in our Continuum of Care to assist homeless and near-homeless individuals and families.”

COBB COUNTY CDBG PROGRAM OFFICE
Homelessness Prevention and Rapid Re-Housing Program
Substantial Amendment to PY 2008 Action Plan
April 8, 2009
Cobb County Board of Commissioners Room
Minutes

The Public Hearing was opened at 9 a.m. by Samuel A. Kilcrease from the Cobb County CDBG Program Office, at the Cobb County Board of Commissioners Room.

- At 9:00 a.m. Mr. Kilcrease welcomed those in attendance and introduced himself.

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- Mr. Kilcrease made some general announcements regarding meeting discussion and questions.
- Mr. Kilcrease then turned the meeting over to Cobb County CDBG Program Office Managing Director Nick Autorina at 9:05 a.m.
- Mr. Autorina presented to attendees the purpose of the meeting: explanation of the Homelessness Prevention and Rapid Re-Housing Program [HPRP].
- Mr. Autorina gave the outline of the program, including total amount Cobb County would receive for HPRP.
- Mr. Autorina discussed the methodology behind how the organizations receiving grant money were selected: using a Formula Allocation as opposed to a Competitive Process.
- Mr. Autorina discussed that the HPRP required a Substantial Action Plan Amendment to the PY 2008 Annual Action Plan, and commented on the conceptual budget included.
- Mr. Autorina gave the timeline of key dates for HPRP:
 1. April 18th – Public comment period ends, totaling 15 days versus 12 days required by HUD;
 2. April 30th – the Cobb County Board of Commissioners will vote on receiving HPRP funds;
 3. May 4th – Our deadline to submit application for HPRP grant funds;
 4. May 18th – HUD’s deadline for HPRP application process;
 5. Mid-June – Anticipated time for HUD approval for HPRP;
 6. Sept. 30th – HPRP begins with funds becoming available for use
- Mr. Autorina commented on the speed of which this program would go into effect before opening the floor for comments and questions at 9:10 a.m.
- Mr. Andy Peabody (MUST Ministries) spoke on the opportunities for collaboration HPRP presented and was excited about the Rapid Re-Housing portion of the program.
- Ms. Carolyn Bridges (Center for Family Resources) discussed how the HPRP was a better plan with better latitude than the previous programs in place and how it was more exciting to participate in this one.
- Ms. Cathy Vandenberg (Legal Aid) discussed how this was a prime time to implement community education programs and one-on-one consultations. She sees people going to other agencies for assistance, but if they don’t know their rights or the laws, they could be on the streets after only one month of assistance. She also commented on how the economic times have caused her organization to lose funding and was excited to see this program.

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- Ms. Bridges spoke about how the organizations need to work together and figure out ways to fix the situation and agreed with Ms. Vandenberg's comments about the need for community education and consultations.
- Mr. Peabody posed a question about Rapid Re-Housing and the barriers in place regarding housing. He said the need for conversation on the programs they will work on is needed.
- Mr. Autorina outlined exactly what HPRP does and does not include in relation to assistance, including participants cannot receive aid for items they are already receiving aid for through other programs. He said HPRP is not a mortgage program, but will help with the payments of:
 1. Short- and Medium-Term Rental assistance (with up to 6 months of unpaid rental arrears);
 2. Security Deposits
 3. Utility Payments
 4. Utility Deposits
 5. Moving Costs
 6. Motel/Hotel Vouchers
- A question regarding the data collection process and methodology using HMIS was raised. Mr. Autorina said the information was not currently available, but as the information comes from HUD, it would be passed along.
- A question about eligible participant selections was raised and Mr. Autorina said there was not an approved selection method in place for choosing recipients from eligible participants.
- Mr. Autorina discussed how Cobb County had until Sept. 30 to select the sub-recipients for the HPRP. While HPRP is a 3-year program, the County would enter into 2-year agreements with the sub-recipients in hopes of earning more funding during the 3rd year of the program.
- Mr. Autorina invited the attendees to the Regional Meetings for HUD taking place sometime in May or June. He said he would forward the information as soon as he received it.
- Mr. Jeremy Gray (Cobb County CDBG) made a brief comment on HPRP.
- Mr. Autorina discussed the need to have all properties inspected to be in compliance with HPRP's guidelines. He offered the CDBG inspector to assist the selected sub-recipients.
- Mr. Peabody discussed the upcoming Continuum of Care (CoC) meeting and pointed out how the HPRP would be brought up for discussion. Discussions on the positive impact HPRP would have on CoC briefly followed.

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- Mr. Gray discussed changes made to the CSBG program and will give updates as more information on these changes comes in.
- Mr. Autorina adjourned the meeting at 9:50 a.m.

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:

Based on the skill-set and capacity of various non-profit agencies in Cobb County, the County has chosen a "formula allocation" to select those subrecipients who have had direct experience in homelessness prevention and rapid re-housing programs, in addition to direct experience in the HMIS data collection program request under the HPRP.

Because of the "high-risk" nature and complex rules and reporting requirements under the HPRP, the County utilized a formula allocation to expedite implementation to ensure HPRP funds were being utilized by agencies with the requisite capacity and experience to quantify immediate results for these individuals and families that would qualify under the HPRP program. The two agencies selected by Cobb County for formula funding are: (1) the largest non-profit agency in the County, and (2) a non-profit that serves the largest number of homeless families in a facility setting. Both non-profit agencies have the capacity to carryout this new HPRP in an efficient and expeditious manner.

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).

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Response:

Once Cobb County's grant agreement is received from the Department of Housing and Urban Development and executed, the County will enter into Subrecipient Agreements with both the Center for Family Resources (CFR) and MUST Ministries who will be responsible for HPRP implementation. The County [through the CDBG Program Office] will engage in substantive planning discussions with each agency regarding projected budgets, strategic implementation, and technical assistance to ensure both agencies are trained thoroughly on the content provided in HUD's Notice of Funding Allocation and Requests for HPRP, dated March 19, 2009. Using the formula allocation stated above (in Section C.2), the County will make an equitable distribution of 50% of the remaining grant funds (after administration and data collection & evaluation costs are accounted for) based on the project and services proposed by each agency as shown in the chart below.

HPRP 2009 - 2011 Estimated Budget Summary					
	*Homelessness Prevention		Rapid Re-Housing		Total Amount Budgeted
	CFR	MUST	CFR	MUST	
Financial Assistance	\$350,000.00	\$350,000.00	\$50,000.00	\$150,000.00	\$1,000,000.00
Housing Relocation and Stabilization Services					
(a) **Case Manager	\$56,000.00	\$56,000.00	\$24,000.00	\$24,000.00	\$160,000.00
(b) ***Other Services	\$11,618.60	\$11,618.60	\$4,979.40	\$4,979.40	\$33,196.00
Subtotal	\$417,618.60	\$417,618.60	\$178,979.40	\$178,979.40	\$1,193,196.00
		Cobb County CDBG Program Office			
			CFR	MUST	
Data Collection and Evaluation		\$57,000.00	\$10,000.00	\$10,000.00	\$77,000.00
Administration		\$57,000.00	\$4,926.00	\$4,926.00	\$66,852.00
Total HPRP Amount Budgeted					\$1,337,048.00

*All "dollar values" assigned to Homelessness Prevention and Rapid Re-Housing Categories are formulated on a 70% - 30% allocation basis, respectively, with each agency receiving 50% of the available funding.

**Case Manager allotted \$80,000.00 over two year period. Each agency will receive \$40,000 each year for a case manager to work on homelessness prevention and rapid re-housing activities.

***Other services to include legal, mediation, and credit repair services.

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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:

Cobb County will be utilizing two dynamic non-profit organizations who are currently receiving resources under the County's Continuum of Care and who are fully staffed and capable of implementing the HPRP as they already provide such services to eligible HPRP clientele. By utilizing organizations who have successful homelessness prevention and rapid re-housing strategies already in place, the County can quickly assimilate the key requirements of the HPRP by tasking agencies that are immediately ready to operate this program.

Additionally, Cobb County (as the grantee) through the CDBG Program Office, will be hiring a full-time HPRP Manager to oversee the implementation of the HPRP, to include technical assistance, training, program monitoring, and data collection. This staff person will be fully integrated during the actual time period of this program for the next two years or until funds are fully expended.

The HPRP Manager, operating out of the CDBG Program Office, will be responsible for monthly and quarterly data collection efforts from each organization performing HPRP activities. This proactive approach will enable the County to validate data as it is assimilated and further eliminate inaccurate reporting of accomplishments.

The HPRP Manager will also provide on-going technical assistance and monitoring to ensure compliance with HPRP regulations and to provide "real-time" reporting to local elected officials and County professional staff.

To ensure further accountability, a Policies and Procedures Manual will be prepared and will reflect protocols that enhance full transparency for all levels of the HPRP.

It is important to point out that Cobb County will be integrating the HPRP into its Continuum of Care. The two formula agencies are major players in Cobb's Continuum of Care activities, and both non-profit agencies are involved in all facets of Cobb's Continuum of Care planning and administration. Cobb County has several Continuum of Care committees which plan prevention, discharge, transitional, and other homelessness policies. Cobb County had one of the first homeless planning coalitions in the nation. The HPRP will build on the long-term planning and policy efforts of Cobb's homeless interagency planning and policy establishment. For example, Cobb County was one of the first Continuum of Care systems in the Southeast to establish a comprehensive discharge policy, with agencies established to carryout programs for discharged foster care, healthcare [hospital and nursing homes], mental health, and corrections discharge protocols.

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The HPRP will assist Cobb County greatly in meeting its Continuum of Care prevention and discharge policies. For example, the Cobb Continuum of Care ten-year plan lists, among others, the following goals:

- Strengthen prevention services
- Improve intake and assessment processes
- Strengthen coordinated case management capacity
- Develop more affordable housing

Through the HPRP, Cobb County will achieve major aspects of goals one through three and will assist in providing affordable rental housing to homeless and near-homeless persons who cannot afford basic housing.

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:

Cobb County's Continuum of Care already has the planning, policies, and procedures in place to coordinate the similar target populations from ARRA and other federal agencies, including the US Department of Education, Health and Human Services, Homeland Security, and Department of Labor. Cobb's HPRP will capitalize on the current Policy Council on Homelessness of the Cobb Community Collaborative to coordinate and utilize all other ARRA and federal and state resources, which might be available for HPRP.

In those instances where the Continuum of Care might not have sufficiently strong policies [i.e. homeland security] and coordination networks, the HPRP will establish such linkages to ensure that comprehensive collaborative procedures are put into place.

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 grantee is the lead agency for the Cobb County Continuum of Care. In this capacity, Cobb County will be able to collaborate with all appropriate Continuum of Care participant organizations and other mainstream resources regarding HPRP

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activities. The Policy Council on Homelessness of the Cobb Community Collaborative will be utilized in a collaborative effort to coordinate all Continuum of Care and mainstream resources with Cobb's HPRP system of homelessness prevention and rapid re-housing. Cobb County has the requisite network in place to carryout this new HPRP. This infusion of prevention dollars will allow Cobb County to utilize the long-time Continuum of Care planning system so that all ARRA and other resources can be brought to bear on this important issue--the prevention of homelessness.

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:

Cobb County has incorporated its Continuum of Care in its Consolidated Plan; therefore, the narrative contained in D. Collaboration 1 & 2 are conducted as components of Cobb's Continuum of Care and its Consolidated Plan. Cobb County, in carrying out the HPRP, will be utilizing the financial assistance and housing relocation/stabilization services in a manner that is consistent with and in furtherance of Cobb County's Consolidated Plan.

As stated in the 2006-2010 Consolidated Plan under Homeless Needs [91.205(b)] sections 1:

Cobb County Response:

- HM1** Support non-profit, private and public entities that provide housing opportunities for at-risk populations (HOME, CDBG, and ESG funding)
- HM2** Assist local organizations with outreach efforts to identify homeless persons and assess their needs (ESG)
- HM3** Assist local organizations in providing emergency shelter for homeless persons, including families, single adults and youth (CDBG, ESG)
- HM4** Assist local organizations in providing transitional housing for homeless persons, including families, single adults and youth (HOME, CDBG, ESG)
- HM5** Assist local organizations to help homeless persons make the transition to permanent housing and independent living(HOME, CDBG)
- HM6** Help low-income individuals and families avoid becoming homeless (HOME, CDBG, ESG)

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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	\$ 700,000.00	\$ 300,000.00	\$1,000,000.00
Housing Relocation and Stabilization Services ²	\$ 135,237.20	\$ 57,958.80	\$ 193,196.00
Subtotal (add previous two rows)	\$ 835,237.20	\$ 357,958.80	\$1,193,196.00
Data Collection and Evaluation ³			\$ 77,000.00
Administration (up to 5% of allocation)			\$ 66,852.00
Total HPRP Amount Budgeted⁴			\$ 1,337,048.00

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.”

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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)

Title