

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

OMB Approval Number: 2506-0180
(Expiration Date: 9/30/2009)

A. General Information

Grantee Name	City of Memphis, TN
Name of Entity or Department Administering Funds	Division of Housing and Community Development
HPRP Contact Person (person to answer questions about this amendment and HPRP)	Mary-Knox Lanier
Title	Administrator, Homeless & Special Needs
Address Line 1	701 N. Main Street
Address Line 2	
City, State, Zip Code	Memphis, TN 38107
Telephone	(901) 576-7313
Fax	(901) 576-7480
Email Address	mary.lanier@memphistn.gov
Authorized Official (if different from Contact Person)	Robert Lipscomb
Title	Director, Division of Housing and Community Development, City of Memphis
Address Line 1	701 North Main Street
Address Line 2	
City, State, Zip Code	Memphis, TN 38107
Telephone	(901) 576-7308
Fax	(901) 576-7444
Email Address	robert.lipscomb@memphistn.gov
Web Address where this Form is Posted	www.memphistn.org

Amount Grantee is Eligible to Receive*	\$3,329,685
Amount Grantee is Requesting	\$3,329,685

*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:

- 1) On March 29, 2009, a Public Notice was published in the Commercial Appeal newspaper to inform the public about the availability of funds and a public meeting concerning both the Consolidated Plan and HPRP. The hearing notice was also circulated widely by email.
 - 2) On April 9, 2009 a public meeting was held during which overview information was provided on the HPRP including: funds available, eligible activities, and best practice information.
 - 3) On April 15, 2009 a joint Memphis Shelby County Continuum of Care (MSCCoC) and the Greater Memphis Interagency Coalition for the Homeless (GMICH) meeting was held at which time information on HPRP was provided and members were invited to participate in planning meetings.
 - 4) On May 1, 2009 the proposed amendment, HUD 40119 was posted on the City's website, public notice of its availability was published in the Commercial Appeal, and the document was made available for public inspection at the Department of Housing and Community Development.
2. Provide the appropriate response regarding this substantial amendment by checking one of the following options: (Responses to #2 and #3 below will be completed at the end of the comment period before the amendment is submitted to HUD.)

- 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:

C. Distribution and Administration of Funds

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.

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

- Competitive Process
- Formula Allocation
- Other (negotiated contracts)

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

Response: An initial briefing to GMICH and the MSCCoC was held in April. A planning team was then established with homeless service providers, city staff, county staff, non-profit staff, and faith-based organizations that continues to meet to develop the overall plan. Subcommittees were formed that are developing detailed plans in certain areas.

Through this community planning process, it was determined that a small number of agencies were uniquely positioned to combine existing screening, intake, prevention / assistance and HMIS programs with the expanded activities envisioned in HPRP. Group and individual meetings with the City, the City's Consultant and the agencies are used to develop the roles of each in the program as well as their HPRP budgets. The City intends to negotiate contracts with the agencies and to centralize screening and intake as well as build and improve upon existing infrastructure, which includes data collection and analysis, and administration of financial assistance and determination of appropriate housing or shelter resources.

The planning team identified numerous agencies in the community with capacity to carry out stabilization services. Therefore, the City intends to initiate a Request for Proposal (RFP) process to procure housing based case management services from qualified agencies.

Through negotiated agreement with one subgrantee, rental assistance will be provided to property owners and/or property managers according to lease agreements and the tenant's eligibility for financial assistance.

The City of Memphis will use the limited funds available for administration for development, oversight, and administration of the 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: Planning efforts are underway to expedite program design and implementation plans so that funds may be allocated to subgrantees in a timely manner. Planning committees are now meeting every two weeks and will continue to do so through implementation. Budgets, staffing and other details of the plan are being negotiated with the agencies that will provide screening, assessment, financial assistance and data

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

collection. Negotiated contracts with these subgrantees are expected to be ready for execution upon receipt of HUD's grant agreement.

Upon receipt of HUD's acceptance of the City's Substantial Amendment, the City will issue an RFP to local qualified agencies to procure housing based case management services for program participants. Selection of agencies to provide housing based case management will be completed in time for contract development prior to the City's execution of HUD's grant agreement.

Since the City's process to accept funding and execute grant agreements is lengthy, Memphis is developing a process to address HUD's schedule for allocating funds by September 30. Planning is underway to expedite City Council approval processes to allow execution of the contract and allocation of funds. Award letters will be issued to subgrantees by early September and contracts will be executed promptly thereafter.

Existing homeless initiatives will be coordinated with the HPRP program and hiring of new staff will be limited. Subgrantees are expected to begin recruitment efforts with sufficient time to have staff in place 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: For several years, local homeless service providers collaborating with MSCCoC, GMICH, and the City of Memphis have worked to develop various elements of HPRP principles that includes: a central intake (as HUD recommends) serving as a gateway to shelter and housing resources, rapid re-housing to shorten the length of homeless episodes, homeless prevention, and data collection through the Homeless Management Information System (HMIS.) The availability of HPRP funding has served as a catalyst to quickly enhance or put into action these strategic plan elements.

Education efforts have taken place to review best practices in prevention and rapid re-housing from Hennepin County, MN and Norfolk, VA as the City of Memphis develops its programs. A limited central intake program was launched several years ago and both Shelby County and a local non-profit have administered homeless prevention programs for several years that provide an important experiential base from which to develop the HPRP expansion. Last year the Continuum of Care application included a Rapid Re-Housing application on which some aspects of the HPRP program will be based.

Several agencies provide limited home-based services focused on housing retention either as follow-up care to former program participants or in an effort to pilot rapid re-housing principles. The City of Memphis is also working or expects to work with staff from Norfolk and Hennepin County on effective housing-based case management strategies, central intake protocols, and landlord recruitment.

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

The City of Memphis will execute and oversee HPRP-funded contracts with subgrantees for eligible activities according to HUD's guidance and will ensure that HUD's requirements around client eligibility are met. Goals for planned spending will be included in each contract with other performance criteria, which will be reviewed by staff on a quarterly basis. The City will hold a pre-implementation workshop for subgrantees, make initial technical assistance visits to each subgrantee's site to discuss goals and record keeping, and provide on-site monitoring to review case files for eligibility of clients in compliance with established City procedures.

Both the City and the HPRP Planning Committee will require monthly data reports (using HMIS) that identify: 1) the number of and any trends among those seeking assistance, those found eligible for financial assistance, those found in need of emergency shelter; 2) the number of those provided financial assistance, placed in shelter/transitional housing, or applying for mainstream resources; 3) the number of those referred to and/or engaged in housing based case management; 4) the number/percentage remaining stably housed at 3, 6, and 12 months; and 5) the number of adults returning to shelter after receiving assistance.

The City will use administration funds for consultant services to develop and implement the program, to help evaluate performance of the subgrantees, and prepare required quarterly and annual reports for the first year of the program. Additionally, the City will hire additional staff for the Homeless and Special Needs Department to administer the contracts with subgrantees and perform other required administrative duties of the HPRP program.

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 continues to seek collaboration with State and County organizations receiving funds or potentially receiving funds under the American Recovery and Reinvestment Act of 2009. Representatives from these entities have been encouraged to participate in planning committees and the City has reached out to organizations serving the target population with significant results. Decisions have yet to be made on State distribution of Health and Human Services (HHS) funding but representatives serving on the Planning Committee are actively working to ensure efforts are coordinated if not integrated. Schools, HHS contractors, and workforce training providers have participated in planning committee work and are expected to participate in the HPRP program.

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

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: Several Continuum of Care providers and agencies administering mainstream resources are involved in developing the plans for the HPRP program and will be subgrantees. These agencies include those currently involved in screening, assessment, prevention and HMIS activities. They, along with other members of the Continuum will be involved in the HPRP program in the following ways: 1) by centralizing access to shelter and transitional housing resources in an effort to minimize shelter entry; 2) by serving on planning and oversight committees as programs are implemented; and 3) if selected through the RFP process, by providing housing based case management services.

Mainstream resources are a critical feature of the City of Memphis's proposed plan. A centralized screening, assessment, and intake team will include EarnBenefits screening and application assistance in addition to housing counseling and placement. These members of the team will be co-located or integrated into the central intake function. This is expected to result in increased Food Stamp, Medicaid, and other means-tested program participation rates. Individuals identified as potentially eligible for Social Security benefits will be connected with a SSI/SSDI Outreach Access and Recovery (SOAR) specialist and those identified as in need of mental health and/or substance abuse treatment services will be referred to those services. The housing-based case management teams will ensure connectivity to these community resources in order to promote housing stability and self-sufficiency. As indicated earlier, HPRP will be evaluated based on housing stability, returns to shelter, and mainstream resource connectivity.

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: Although Memphis' Consolidated Plan identifies Emergency Shelter Grant funding for homeless prevention activities, it does not identify homeless prevention or rapid re-housing activities as funding priorities. However, it recognizes the need for rental assistance for homeless populations. Memphis Homeless Priority Need I recognizes the need to provide rental assistance to help clients improve their health, establish incomes where possible, and maintain residential stability. Homeless Priority Need III proposes rental assistance (time-limited and/or non-time-limited) and supportive services for homeless and/or precariously housed individuals. The Consolidated Plan describes the use of HOME Tenant Based Rental Assistance funds to assist homeless households. Although not described in the Consolidated Plan, Shelter plus Care funds provide rental assistance for homeless individuals with disabilities.

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

The PY 2009 Consolidated Annual Action Plan will include the HPRP Substantial Amendment and will reflect the proposed activities described herein.

The PY 2009 performance measure is to provide rental assistance and ensure supportive services for homeless and/or precariously housed individuals by developing 45 new beds/units. However, the HPRP program proposes to provide services to a significantly larger population. The HPRP program proposes to screen 1,000 household heads per month for financial assistance and to provide 650 households with financial assistance per year. The housing broker team is expected to serve 400 households per year and the housing based case management team is expected to serve 650 households per year to help ensure continued housing stability.

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.

HPRP Estimated Budget Summary			
	Homelessness Prevention	Rapid Re-housing	Total Amount Budgeted
Financial Assistance ¹	\$1,225,920	\$817,280	\$2,043,200
Housing Relocation and Stabilization Services ²	\$588,800	\$392,000	\$980,000
Subtotal (add previous two rows)	\$1,813,920	\$1,209,280	\$3,023,200
Data Collection and Evaluation ³			\$140,000
Administration (up to 5% of allocation)			\$166,485
Total HPRP Amount Budgeted⁴			\$3,329,685

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.”

**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)

Signature/Authorized Official

Date

Title