

Wayne County
Substantial Amendment to the Consolidated Plan 2008 Action Plan for the
Homelessness Prevention and Rapid Re-Housing Program (HPRP)
Allocation: \$2,308,510

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.

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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)

A. General Information

| | |
|--|---|
| Grantee Name | Wayne County |
| Name of Entity or Department Administering Funds | Economic Development Growth Engine (EDGE) |
| HPRP Contact Person (person to answer questions about this amendment and HPRP) | Cynthia Cooper Vails |
| Title | Deputy Director, Community Development |
| Address Line 1 | Wayne County |
| Address Line 2 | 600 Randolph |
| City, State, Zip Code | Detroit, Michigan 48226 |
| Telephone | 313-224-6655 |
| Fax | 313-224-6233 |
| Email Address | cvails@co.wayne.mi.us |
| Authorized Official (if different from Contact Person) | Robert A. Ficano |
| Title | County Executive |
| Address Line 1 | Wayne County Wayne County Building |
| Address Line 2 | 600 Randolph, Suite 349 |
| City, State, Zip Code | Detroit, Michigan 48226 |
| Telephone | 313-224-0286 |
| Fax | 313-224-8458 |
| Email Address | RFicano@co.wayne.mi.us |
| Web Address where this Form is Posted | waynecounty.com/hprp |

| | |
|---|-----------------------|
| Amount Grantee is Eligible to Receive* | \$2,308,510.00 |
| Amount Grantee is Requesting | \$2,308,510.00 |

*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:

The Wayne County Citizen Participation Plan has been developed in accordance with Title 24 part 91.105 of the Code of Federal Regulation (24 CFR 91.105). Accordingly, any substantial change to the Action/Consolidated Plan shall comply with all public notice requirements and the Commission approval process. Posted on Friday, April 24, 2009, a public notice summarizes the HPRP amendment plan and announces a 12-calendar-day public comment period from Monday, April 20 to the close of business on Friday, May 1, 2009 at the following locations:

1. Wayne County Clerk's Office
2. Wayne County Commission
3. On the County's official website, www.waynecounty.com/hprp, and
4. On the website of the designated Continuum of Care (CoC), the Out-Wayne County Homeless Service Coalition, coordinated by Wayne Metropolitan Community Action Agency, www.waynemetro.org.

In addition, the HPRP amendment plan will undergo the Wayne County document approval form (DAF) process with the intent of being on the agendas for public meetings of the Wayne County Commission's Committee on Economic Development on Tuesday, April 28, 2009 and the Wayne County full board on Thursday, May 7, 2009.

2. Provide the appropriate response regarding this substantial amendment by checking one of the following options:

To be completed subsequent to the public comment period commencing.

- 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:

To be completed subsequent to the public comment period commencing.

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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: **Subgrants will be awarded to designated subrecipients**)

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

Response:

To be efficient and expeditious, Wayne County plans to infuse these dollars into existing programs. Funds will be awarded to two subrecipients, one to directly provide services and the other to competitively award them on behalf of the county. Just as the HPRP notice instructs, Wayne County will coordinate with other community planning efforts.

For example, Wayne County will subgrant to Lighthouse Community Development, a nonprofit corporation under contract to provide counselors for the Wayne County Mortgage Foreclosure Prevention Program (MFPP). Clients are provided case management to prevent foreclosure but in the event it cannot be avoided then the funds will be used for a re-housing assistance to prevent future housing instability. No HPRP will be used for mortgage assistance. Lighthouse/MFPP will be funded approximately two thirds of the allocation after set asides for administration and data collection.

Another example, HPRP will be subgranted to the HUD-designated Continuum of Care (CoC) known as the Out-Wayne County Homeless Coalition. The lead agency, Wayne-Metropolitan Community Action Agency, will be required to conduct the CoC's standard process for conducting requests for proposals. The subgrants will be qualified by the CoC and approved by Wayne County before the September 30, 2009 deadline. The CoC will be funded approximately one third of the allocation after set asides for administration and data collection. Because the CoC will be responsible

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for HMIS requirements, it will receive the data collection set-aside, approximately 2.5 percent of the allocation.

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:

Wayne County is preparing subrecipient agreements with Lighthouse Community Development and with the Continuum of Care (CoC). The agreements will be executed subsequent to formal Wayne County and HUD approvals of this amendment plan. The CoC will initiate a Request for Proposals (RFP) by June 1, 2009. The CoC will subgrant to qualified programs approved by Wayne County subject to a fully executed subrecipient agreement before the September 30, 2009 deadline.

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:

Because of the high level of demand for HPRP-eligible services and given the capacity established by our designated subrecipients, Wayne County will comply with the requirement to spend down 60 percent of the funds within two years and 100 percent of the funds. For example, inside of a six-month time period, Lighthouse Community Development and the MFPP have demonstrated capacity by putting into place a case management system that has helped over 1,000 families facing eminent mortgage foreclosure. According a *Detroit Free Press* article (p. 1F), "Hope for Homeowners," dated Sunday, April 12, 2009, of the 1,164 families that were assisted by the MFPP, 125 were unable to keep their homes. Because the MFPP does not rely on mortgage assistance to assist clients, the fact that it is an ineligible HPRP activity does not affect the program. To stave off foreclosure and homelessness, HPRP will pay for financial assistance that is eligible and for case management services. Then HPRP will afford financial assistance and case management services to the approximate 11 percent of MFPP families who need rapid re-housing. Using the funds for a successful, well-established program such as MFPP ensures effective and timely use and will increase the numbers served.

In terms of overseeing and monitoring progress, the MFPP has an established interactive database that tracks the address and progress of each case. The database provides immediate progress reports. The invoicing process

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established under the County's existing Community Development Block Grant (CDBG) will provide a good model for the subrecipient to report performance and compliance coinciding with funding disbursements. An Economic Development Growth Engine (EDGE) staffer will be paid for in part from the five percent allowed for administration and will be assigned to review and process the HPRP payments, conduct subrecipient monitoring, and manage a HPRP compliance and performance recordkeeping system. Lighthouse is an experienced Homeless Management Information System (HMIS) and therefore will be able to comply with the HMIS reporting requirements.

In the spirit of open competition, out-Wayne County homeless service providers will have an opportunity to apply for HPRP through the CoC. Effectiveness, timelessness, and compliance are assured through the capacity and experience of the CoC and the HUD-designated lead agency, Wayne-Metropolitan Community Action Agency. Wayne-Metro will be required to review and process the HPRP payments and conduct subrecipient monitoring. This is a natural fit because according to the notice, all HPRP grantees are required to use the Homeless Management Information System (HMIS) in the applicable CoC and the CoCs will ultimately report the impact of this allocation through required point-in-time counts and other data collected by HUD. For Wayne County, a good portion of the administrative burden is remedied with the efficiency of having the single subrecipient agreement with the CoC to manage on behalf of the network of service providers.

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 County's HPRP subrecipients will collaborate with agencies that serve similar target populations, which receive ARRA funds. For example, MFPP case managers helping families tackle high utility costs can help families reduce monthly energy usage by connecting them to the weatherization assistance program (WAP). WAP is more accessible with the in-flux of ARRA dollars. Collaboration with the local WAP operators will not be difficult given that they are Wayne County, the Downriver Community Conference (DCC), which houses a MFPP office, and Wayne-Metro, the lead agency for the CoC.

Current collaborations exist between 1) the MFPP and United Way 2-1-1 and 2) the providers in CoC's Out-Wayne County Homeless Service Coalition.

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Because of MFPP's partnership with United Way 2-1-1, families connect with resources that include mortgage foreclosure assistance, utility assistance, rent assistance, educational programs, food, clothing, and other basic family needs. For the Coalition, an informal partnership between over thirty agencies creates a cohesive set of services and results in a more unified front in combating the causes and conditions of homelessness in Out-Wayne County.

Wayne County and the HPRP subrecipients will coordinate with other agencies that receive ARRA funds to develop referral processes. Coordination with other ARRA programs may include: child care, healthcare, TANF and other public assistance, employment services, unemployment benefits, tax credits, education, domestic violence services, FEMA, low-income housing and other services. As more information becomes available, Wayne County and its HPRP subrecipients will work to establish a process for connecting participants to ARRA funded services.

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:

Wayne-Metropolitan Community Action Agency is the lead agency for the Continuum of Care (CoC). The Out-Wayne County Homeless Service Coalition is the CoC community organization that addresses homelessness. Wayne County and the Coalition have a history of collaboration that includes developing the Three Year Strategic Plan Homeless Needs response in Wayne County's Consolidated Plan. The HPRP prevention and rapid rehousing activities are consistent with the Consolidated Plan's strategies. The Coalition's membership includes: housing providers, service providers, government and other community members. The mission of the Coalition is to eliminate homelessness in the Out Wayne County area. To this end, the Coalition identifies and illuminates economic and social issues at the local and state level that contribute to homelessness and substandard housing, and works to improve the capacity of all community partners to help homeless, imminently homeless and marginally housed persons locate, secure and sustain permanent housing.

Collaboration will take place through a variety of methods including telephone conversations, written communications and meetings. Wayne County HPRP subrecipients will coordinate closely with mainstream providers to identify and establish referrals processes to link HPRP participants with mainstream opportunities such as employment, veteran's services, TANF , Section 8, health care and other services. Wayne County HPRP subrecipient agencies will assess participants to identify needs for mainstream services and assist participants in linking with the appropriate services. To plan program design,

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screening, referrals, services coordination, and strategies for an effective program, Wayne County, the MFPP, and Lighthouse will meet regularly with the Coalition.

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:

According to Wayne County's 2007 Three-Year Consolidated Plan, A "Continuum of Care" approach continues to be the most is effective means to achieving the goal to end homelessness. The Consolidated Plan supports the provision of funds, assistance and support to area agencies, which work with families and individuals to prevent them from becoming homeless...

According to Wayne County's 2007 Three-Year Consolidated Plan, we want to, "...ensure that all homeless or near homeless persons receive a comprehensive needs assessment and an individualized case plan addressing their unique needs."

HPRP funds will be used to address these needs by providing financial assistance, and housing relocation and stabilization services for homeless persons, which may include: short and medium-term rental assistance, security deposits, utility deposits, utility payments, moving cost assistance, and motel and hotel vouchers. Case management services may provide housing relocation and stabilization services, and referrals to other community and mainstream resources.

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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 | 896,857 | 384,367 | 1,281,224 |
| Housing Relocation and Stabilization Services ² | 597,904 | 256,245 | 854,149 |
| Subtotal (add previous two rows) | 1,494,761 | 640,612 | 2,135,373 |
| Data Collection and Evaluation ³ | | | 57,712 |
| Administration (up to 5% of allocation) | | | 115,425 |
| Total HPRP Amount Budgeted⁴ | | | 2,308,510 |

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)

Signature/Authorized Official, **Robert A. Ficano**

Date

Title, **County Executive**