

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)

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

A. General Information

Grantee Name	Broward County Florida
Name of Entity or Department Administering Funds	Environmental Protection & Growth Management Dept. / Housing Finance & Community Development Division
HPRP Contact Person (person to answer questions about this amendment and HPRP)	Fredrick Shepherd
Title	Housing & Community Development Manager
Address Line 1	110 NE 3 ^d Street
Address Line 2	
City, State, Zip Code	Fort Lauderdale, FL 33301
Telephone	(954) 765-5316
Fax	(954) 765-5340
Email Address	Fshepherd@broward.org
Authorized Official (if different from Contact Person)	Ralph Stone
Title	Director, Housing & Community Development Division
Address Line 1	110 NE 3 ^d Street
Address Line 2	
City, State, Zip Code	Fort Lauderdale, FL 33301
Telephone	(954) 765-5320
Fax	(954) 765-8646
Email Address	Rstone@broward.org
Web Address where this Form is Posted	http://www.hud.gov/recovery/homeless-prevention.cfm

Amount Grantee is Eligible to Receive*	\$1,579,569
Amount Grantee is Requesting	\$1,579,569

*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 availability of Homelessness Prevention and Rapid Re-Housing Program (HPRP) funds was initially discussed at the Homeless Initiative Partnership (HIP) Board meeting on March 23, 2009. This is the public body that decides the manner in which funds used to assist the homeless in Broward County are prioritized. This meeting was advertised in advance by the HIP Division.

The availability of HPRP funds was also discussed at the Broward County Homeless Continuum of Care, Homeless Providers and Stakeholders' Council (PSC) meeting on April 1, 2009. Homeless agency providers were consulted about proposed priorities. They provided Broward County Housing Finance and Community Development Division (HF&CDD) and HIP Division staff with their priorities at that meeting. Staff presented these priorities to the HIP Advisory Board on April 23, 2009. A public notice was advertised in the South Florida Sun-Sentinel that this meeting served as a public hearing. The HIP Board approved these priorities at that April 23, 2009 meeting. The public notice also notified prospective applicants that beginning April 24, 2009, HPRP funding would be available for Financial Assistance, Housing Relocation and Stabilization Services, Data Collection and Evaluation. The application timeframe covered the period from April 24, 2009 to June 1, 2009. The Broward County Board of County Commissioners approved HPRP priorities at their regularly meeting on May 12, 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:

Representatives from the public stated that they wanted legal assistance for renters and credit repair. They further stated that they wanted the HPRP funds to be

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

allocated in the following manner: Financial Assistance 60%, Housing Services 35%, Data Collection and Evaluation 5%. They want both Homelessness Prevention and Rapid Re-Housing activities to be funded.

The comments made by the public represented a general consensus and there were no views that were not accepted.

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:

The Broward County Housing Finance and Community Development Division (HF&CDD) works in an on-going partnership with the Broward County Homeless Initiatives Partnership Division (HIP) on all issues related to the homeless. HF&CDD is the lead agency in Broward County for the administration of HUD Community Planning and Development Program (CPD) grants such as CDBG, HOME and ESG and, therefore, has an on-going mechanism to implement and manage grants such as the HPRP.

Both HIP and HF&CDD asked the Broward County Homeless Continuum of Care to rank priorities for the HPRP grant. A public notice was advertised stating that these priorities were to be presented to and approved by the HIP Advisory Board on April 23, 2009. The Public Notice also advertised the availability of the HPRP funds and the timeframe for the Request for Proposals (RFP) process.

Prospective applicants had between April 24, 2009 and June 1, 2009 to complete an application for funding and submit it to the HF&CDD. The HF&CDD's next step would be to implement an evaluation process for the HPRP applications. The evaluation process is expected to take two weeks. Final recommendations are to be

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

made by June 15, 2009. These recommendations will be presented to the Broward County Board of County Commissioners for approval on June 23, 2009. Contract preparations will commence with the successful applicants on June 24, 2009. The HF&CDD will be ready to proceed with executed contracts once the grant agreement is approved and forwarded to HF&CDD any time after June 24, 2009 and before September 30, 2009.

3. Briefly describe the process the grantee plans to use, once HUD signs the grant agreement, to allocate funds available to sub-grantees by September 30, 2009, as required by the HPRP Notice (limit 250 words).

Response:

HF&CDD will prepare contractual agreements with the successful applicants. These agreements will specify the terms and conditions that must be met in order to effectively implement the priorities approved by the Board of County Commissioners and be consistent with HUD regulations.

Agreements will be signed and executed with the sub-grantees through the same type of process that HF&CDD uses with its CDBG, HOME and ESG agencies. HF&CDD already has fiscal and programmatic controls in place and they will be used for HPRP as well. Funds will only be disbursed based on approved items in the agreement and requests for reimbursement must include an invoice for the requested expense.

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:

**BROWARD COUNTY FY 2005 - 2010 FIVE YEAR CONSOLIDATED PLAN
MONITORING STANDARDS AND PROCEDURES**

The Broward County Housing Finance and Community Development Division Monitoring Plan is applicable for all Community Planning and Development (CPD) grant programs such as the Community Development Block Grant Program (CDBG), the HOME Investment Partnerships Program (HOME) and the Emergency Shelter Grant Program (ESGP). This plan will also be applicable for the Homelessness Prevention and Rapid Re-Housing Program (HPRP). This plan includes standards and procedures that will be used to monitor Division funded activities in the major categories of Housing, Living Environment, and Economic Opportunities as prioritized in the FY 2005 - 2010 Five Year Consolidated Plan. The extent to which barriers to affordable housing can be removed, minority business outreach initiatives are effective, and Broward County Comprehensive Plan requirements will also be monitored for performance purposes.

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

The funding agreement includes, under Exhibit “C”, a timetable/schedule for projects. This is comprised of specific work tasks, a start-up date and a completion date. Sub-recipients are also required to submit, under Exhibit “D”, Monthly Progress Reports, chronologically detailing the steps taken to meet the quantifiable objectives enumerated in Exhibit “C”. Monthly Progress Reports are intended to provide an update on a sub-recipient’s progress in meeting agreed upon objectives; they should include federally mandated reporting information, such as, matching contributions, contracts let to minority and women owned businesses and statistics on any relocations. In certain instances, additional information is required of sub-recipients so that County staff can effectively engage in desk monitoring activities. Items such as environmental review documents, documentation provided by escrow/title companies, etc., necessary for determining compliance with certain policies may be requested as necessary.

In-house staff monitors the timely expenditure of CPD grant program funds on an on-going basis. Monthly Progress Reports, reimbursement requests and IDIS draw downs are tracked and documented regularly to ensure that HUD expenditure rates are met. If expenditure rates fall below the norm, staff contacts sub-recipients immediately to try to resolve any impediments to getting these funds spent in a timely manner. If a sub-recipient cannot move forward in a timely manner due to circumstances beyond their control, funds will then be reprogrammed and used for activities where they can be expended in a more expeditious manner.

Broward County identified the major categories of Housing, Living Environment, and Economic Opportunities as high priorities in the Consolidated Plan. Most of the activities implemented under these categories are carried out by sub-recipients. The sub-recipients are either non-profit organizations or governmental organizations. These major categories cover all of the grant programs, CDBG, HOME, ESGP, and HPRP. Actions to be taken toward monitoring performance in meeting goals and objectives are as noted:

1. Staff conducts desk monitoring during all stages of each project based on a combination of risk analysis and random sample. Documented desk monitoring includes the following: a detailed review of the sub-recipient’s agreement, including national objectives, eligible activities, cost reasonableness, citizen and public participation and certifications; requests for payment; ERR; procurement and contracting; acquisition; construction bids/contracts; labor standards, weekly payrolls employee reviews; Section 3; housing rehabilitation guidelines; home ownership assistance guidelines; monthly progress reports; sub-recipient agreements’ closeout reports and audits. After a document such as a monthly progress report is desk monitored, the sub-recipient is notified in writing, as to whether the document is compliant or what corrective actions are needed with a date for such to be completed.

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

2. Broward County Housing Finance and Community Development Division also conducts on-site monitoring visits to non-profit organizations and governmental organizations. Additionally, the frequency of an on-site visit may be based on risk analysis which takes into account the following: prior desk and on-site monitoring of both the specific project being reviewed and prior projects; the knowledge and experience of the administrative staff; staff turnover; the date of the last on-site visit; the nature and complexity of project undertaken; project revisions; audit concerns and complaints. During the on-site monitoring, samples of files are reviewed and the project sites are visited to ensure conformance with the information in the inter-agency agreement.

Monitoring Unit and Fiscal Management Section staff carries out periodic monitoring and evaluation activities as deemed necessary. Fiscal monitoring visits cover the following:

1. Financial management of governmental activities will be reviewed for compliance with applicable requirements of 24 CFR 85.20 entitled “Standards for Financial Management Systems”; CFR 85.26 “Non-Federal Audits”; CFR 85.42 “Retention and Access Requirements for Records”.

Financial requirements for non-profit entities will be reviewed for compliance with requirements of OMB Circular A-110, Subpart C, Sections 110.20-110.28 and 110.50-110.53 on Financial Management Systems.

2. Procurement procedures will be examined to determine compliance with CFR 85.36 (governmental entities) and OMB Circular A-110, Subpart C, Sections 110.40-110.48 (non-profits).
3. Allowable costs will be checked by a review of expenditures for compliance with the sub-recipient agreement and OMB Circulars A-87 (governmental entities) and A-122 (non-profit organizations).
4. All sub-recipients expending grant funds from Broward County are required to provide an organization-wide audit prepared by an Independent Certified Public Accountant licensed by the State of Florida, in accordance with Generally Accepted Accounting Principle and OMB Circular -133 entitled Audits of States, Local Government and Non-Profit Organizations” as applicable. This report will be used as an essential tool in the monitoring of sub-recipients.
5. Prior to receipt of any grant funds, new recipients will be visited to ensure that they have an adequate accounting system in place with proper controls to account for all grant funds and to safeguard County assets.

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

Programmatic, on-site monitoring will be conducted by Monitoring Unit staff utilizing both fiscal and programmatic monitoring checklists. These checklists are an attachment to the Monitoring Plan. Subrecipients will be monitored at least once per year. Additional monitoring visits may be conducted if needed. Monitoring visits may be conducted for new sub-recipients when they are initially funded. They will also be monitored once sufficient progress has been made with their scope of services so that a valid judgment can be made, yet early enough to avoid major problems. Monitoring Unit staff will:

1. Analyze sub-recipients to determine strengths and weaknesses.
2. Monitor real performance vs. sub-recipient agreement activities timetable.
3. Make sure all documents/reports are submitted to the Community Development Division in a timely manner.
4. Review client files for eligibility as applicable.
5. Ensure that corrective actions are taken to resolve deficiencies and program weaknesses.
6. Ensure that sub-recipients are engaged in minority business outreach efforts and comply equal opportunity requirements.
7. Ensure that activities funded comply with Broward County Comprehensive Plan.

Following the monitoring visit, a monitoring report listing the results of the visit is submitted to the Division Director for his comments. This report will include all findings, concerns and corrective actions. Once the Division Director has had the opportunity to provide his comments on the monitoring report, a Monitoring Letter is presented to the sub-recipient under the Director's signature outlining findings, concerns, and specific recommendations for improvement along with accompanying deadlines as appropriate.

At the end of each project, effectiveness reviews are done, comparing actual accomplishments with projections in the Scope of Services of the agreement with Broward County.

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).

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

Response:

Broward County will continue to collaborate with local mainstream systems which include agencies that that have also received funding under the American Recovery and Re-investment Act of 2009. These agencies are integral to the Continuum of Care and they are:

PHAs and Housing Agencies: The Broward County Housing Authority, the Housing Authority of Ft. Lauderdale, and the Hollywood Housing Authority are agencies that provide long-term subsidies to people at the highest risk of homelessness;

TANF Agencies: The State of Florida's Dept. of Children and Family Services assesses families for risk of homelessness and offers resources to providers to do homelessness prevention and re-housing assistance for families with children;

Mental Health and Public Health Agencies: Henderson Mental Health Center and the Broward Addictions Recovery Centers are agencies that provide services in permanent supportive housing for people who are unable to maintain housing even with a subsidy because of a disability;

VA: Healthcare for Homeless Veterans at Miami VA Healthcare System is an agency that assesses veterans for risk of homelessness and offer resources to providers to do homelessness prevention and rapid re-housing for veterans;

Corrections: The Broward Sheriff's Office Performs effective discharge planning to identify stable housing situations upon discharge and offer resources for providers to re-house people who do not have stable housing upon exit;

Employment Agencies: Workforce One is an agency that prioritizes employment assistance for people who are homeless or at risk of homelessness.

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 Broward County Homeless Initiative (HIP) Advisory Board & Division is the designated lead agency for the Homeless Continuum of Care (CoC) in Broward County. HF&CDD collaborates with HIP in setting local priorities for the use of the HPRP funds at joint public meetings with stakeholders as well as with municipal jurisdictions within the Continuum who are applying for HPRP funds. HF&CDD will collaborate throughout the sub-granting process as well as on data entry requirements using CoC's Homeless Management Information System

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

(HMIS). HIP will also coordinate with HF&CDD in terms of establishing a referral process using the existing Homeless Helpline, linkages to other CoC housing and services appropriate for individual clients' needs and coordination with CoC and mainstream providers & stakeholders.

In addition, there are objectives in the County's Ten Year Plan to End Homelessness that can be included as CoC strategies consistent with HPRP. They are:

Rapid Re-housing

Create a Housing Specialist position for each Homeless Assistance Center (HAC)

Identify and refer eligible candidates at first point of contact through centralized assessment

Create and maintain inventory of available affordable housing

Identify and assist in elimination/reduction of barriers to housing such as credit, discrimination, criminal history

Provide follow-up services

Emergency Prevention

Develop screening mechanism for triage of services to persons facing eviction and maintain information on at-risk households in CSMS-HMIS

Improve accessibility to services through strategies such as reducing wait times for prevention assistance and review need versus adequacy of available assistance

Establish a resource/referral network among providers

Provide in-house prevention-centered casework

Develop financial management/literacy program

Improve accessibility of services to: ex-offenders, youth aging out of foster care, persons being discharged from hospitals and mental health facilities

Systems Change: Mainstream Resources / Discharge Planning

Remove barriers to obtaining government entitlements – mainstream resources

Expedite benefits enrollment by SSA, VA and any other mainstream benefits provider such as Food Stamps, TANF, Child Care

Expand discharge protocol with BSO, DOC, local, County and State mental health facilities,

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

health care facilities, and foster care agencies

Expand peer-centered programs and services

Increase client choice for housing and services through a voucher program

Expand services to address gaps in CoC

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: Both the County's Consolidated Plan and the FY 2008/2008 Annual Action Plan identify the following as a priority and an objective category:

Priority IVA (Suitable Living Environment)

Maintain and expand the existing supply of housing for the homeless and preventive services for the at-risk homeless. **Proposed Outcome - Sustainability**

The provision of HPRP grants to sub-grantee agencies selected through a competitive process will ensure that eligible and qualified applicants have been chosen to provide financial assistance and housing relocation/stabilization services. The HF&CDD will monitor the agencies recommended for funding to ensure that services funded are consistent with the Consolidated Plan.

HPRP grants are to be awarded according to the same citizen participation and consultation process as CDBG, HOME and ESG as previously identified. The availability of funds is advertised. Prospective providers submit applications for funding. Staff reviews and evaluates the applications and the agencies that score the highest are awarded funds subject to availability of resources and the percentage caps for prevention, essential services and operational costs.

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	\$450,177.00	\$450,177.00	\$900,354.00
Housing Relocation and Stabilization Services ²	\$262,604.00	\$262,604.00	\$525,207.00
Subtotal (add previous two rows)	\$712,781.00	\$712,781.00	\$1,425,561
Data Collection and Evaluation ³			\$75,030.00
Administration (up to 5% of allocation)			\$78,978.00
Total HPRP Amount Budgeted⁴			\$1,579,569.00

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.”

**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