

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	City of San Antonio, Texas
Name of Entity or Department Administering Funds	Department of Community Initiatives
HPRP Contact Person (person to answer questions about this amendment and HPRP)	Jenny Ayala
Title	Contract Administrator
Address Line 1	115 Plaza de Armas, Suite 150
Address Line 2	
City, State, Zip Code	San Antonio, Texas 78205
Telephone	(210) 207-8138
Fax	(210) 207-7843
Email Address	Jenny.Ayala@sanantonio.gov
Authorized Official (if different from Contact Person)	Dennis J. Campa
Title	Director
Address Line 1	115 Plaza de Armas, Suite 210
Address Line 2	P.O. Box 839966
City, State, Zip Code	San Antonio, Texas 78283-3966
Telephone	(210) 207-7209
Fax	(210) 207-4254
Email Address	dennis.campa@sanantonio.gov
Web Address where this Form is Posted	http://www.sanantonio.gov/comminit/da_info/da_info.asp

Amount Grantee is Eligible to Receive*	\$ 5,974,286
Amount Grantee is Requesting	\$ 5,974,286

*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:

Consistent with our Citizen Participation Plan, the City of San Antonio undertook several activities to provide reasonable notice and an opportunity to comment on this proposed substantial amendment to the 2008-2009 Action Plan. In preparation of the substantial amendment, the City held internal and external meetings.

Date	Meeting
March 23, 2009	DCI Homeless Prevention Funds Planning Group, Director, Assistant Director, and Division Managers
April 2, 2009	DCI Homeless Prevention Funds Planning Group, Homeless Division Managers
April 10, 2009	DCI Homeless Prevention Funds Planning Group, Director, Assistant Director, and Division Managers
April 16, 2009	DCI and SARAH Stakeholder Meeting, Homeless Prevention Funds Discussion
April 20, 2009	DCI Homeless Prevention Funds Planning Group, Homeless Division Managers
May 5, 2009	Public Notice of Review Period, local newspaper
May 5-May 17, 2009 12 days	Public Review Period

The City of San Antonio published a public notice in the Legal Section of the San Antonio Express-News and La Prensa, local newspapers, beginning Tuesday May 5, 2009 - May 17, 2009. This notice informs the public that the Substantial Amendment to the Consolidated Plan in draft form and a list of the projects the City intends to fund with the HPRP funds will be available at 115 Plaza de Armas Suite 210 for public review and comment.

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.

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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:

The City of San Antonio made the draft Substantial Amendment to the Consolidated Plan available to the public. The public comment period was opened from May 5, 2009 through May 17, 2009 and the City did not receive any public comments during this period.

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: Request for Proposal - RFP)

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

Response:

In accordance with the City's Purchasing & Contract Services Department guidelines and procedures, DCI utilized the Request for Proposal (RFP) procurement method. The City uses this method when the competitive bidding process is not suitable, as in certain professional and non-professional services under the State of Texas Statutes.

In this case, the City requested services from non-profit and faith-based organizations whose main focus is housing homeless individuals and assisting at-risk households by providing temporary financial assistance, housing relocation and stabilization services. The RFP for the Homeless Prevention and Rapid Re-Housing Program required prospective respondents to provide a work statement, scope of services, target population for these services, eligibility requirements, time frame, proposal requirements, and specific criteria to be used in evaluating a proposal (% value).

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The City then appointed an RFP Evaluation Committee, which included city personnel and representatives from external stakeholder organizations including the Continuum of Care, to conduct a comprehensive, fair and impartial analysis of all the proposals. Each proposal was analyzed to determine overall responsiveness and qualifications required under the RFP. After the committee ranked the responses for award, recommendations were forwarded to the City's executive staff.

The City Council will make final determination on the recommendations based on the proposed subgrantees' ability to operate within the parameters of the grant; ability to identify eligible program participants and meet their needs; and ability to comply with reporting on accounting mandates.

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:

Upon City Council approval of delegate agencies recommended for award, the City will enter into a contract with the selected agencies. The contracts will include a detailed scope of work and obligations as set forth by HUD regulations in the HPRP, including reporting requirements. HPRP services will be available through several local eligible agencies offering the community easy access to the services that meet varying individual needs. City Council will approve contracts prior to execution of contracts and expenditure of funds.

The City will allocate HPRP funds based on community needs and priorities, and availability of services. The City will work collaboratively with delegate agencies in developing policies and procedures, and identifying resources and responsibilities. The City will also provide assistance to delegate agencies with HMIS training and implementation, outreach plans, referral processes, and program timelines and benchmarks consistent with HPRP requirements.

4. Describe the grantee's plan for ensuring the effective and timely use of HPRP grant funds on eligible activities, as outlined in the HPRP Notice. Include a description of how the grantee plans to oversee and monitor the administration and use of its own HPRP funds, as well as those used by its subgrantees (limit 500 words).

Response:

The City's Department of Community Initiatives (DCI) will be responsible for ensuring the program design and implementation will meet the needs of the community as well as the intent of the HPRP grant. The City will assign an HPRP

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Program Manager, who will be responsible for overseeing and administering the program and ensuring delegate agencies meet all the grant mandates.

Pursuant to a contract with the City, delegate agencies will be required to follow the monitoring procedures established by the City. DCI will be responsible for monitoring all the selected delegate agencies' contracts to ensure the effective and timely use of HPRP funds and compliance with contract requirements, including adherence to HPRP eligible activities, timelines, reporting requirements and guidelines for expenditures. DCI will administer these contracts in accordance with the following:

1. City Contracting Policy and Procedure Manual
2. Department Directives 29: Quality Assurance Reviews, External Audits, and Tracking Reports
3. Department Directive 30: Procedures for Contract Administration & Agency Monitoring
4. Department Directive 35: Cash Management Procedures
5. Office of Management and Budget Circulars governing HUD grants

DCI will assign a contract monitor and a fiscal monitor to every delegate agency contract. Both monitors will coordinate efforts to ensure contract compliance and will develop a contract administration plan and file for each contract. The fiscal monitor will process and submit invoice claims for payment of qualified expenses on eligible activities to the COSA Finance Department. If monitoring findings indicate funds are not being spent expeditiously or are in breach of contractual terms, the unspent funds may be reallocated to fund a different agency or activity.

Contract monitoring will include desk reviews, on-site checks, monthly contractor monitoring reports (CMRs), an unannounced visit, and an end of contract review, among other things. The contract monitor is responsible for reviewing and analyzing the CMR to detect any significant variance on performance and expenditures or non-compliance with the contract.

In addition, delegate agencies will be required to submit a plan for tracking individuals served on a quarterly basis. An initial performance report will be presented to the City by all delegate agencies for submission to HUD on October 10, 2009. Quarterly performance reports will be submitted to HUD 10 days after the end of each quarter, and an annual performance report 60 days after the end of each fiscal year. City staff will provide delegate agencies HMIS training to ensure the timely and accurate reporting of data. DCI contract monitors will work closely with these agencies to ensure accuracy of data needed to meet the HPRP reporting requirements and will continue to do so during the HPRP grant period.

As part of HUD's HPRP grant requirements, the City will also ensure that at least 60% of the HPRP funds are spent within two years from the date funds become available for obligation and 100% with three years of that date.

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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 will continue to collaborate with non-profits, faith-based organizations and other local agencies that serve homeless and at-risk individuals in the community. The City's HPRP plan establishes a dynamic system in which services are linked through referrals and networking with delegate agencies and federal agencies. DCI will use this system to address the specific needs of families and individuals going through a housing crisis and in need of permanent housing, financial assistance or other supportive services.

DCI is committed to make the most effective use of limited resources and it will coordinate services with the following agencies receiving ARRA funds:

- A. Texas Health and Human Services Commission: to make use of the Temporary Assistance for Needy Families (TANF) Emergency Contingency Fund to address families' housing crisis. DCI will refer eligible families to receive non-recurrent, short-term benefits such as financial assistance with security deposits, first month's rent or back rent and utility assistance. Families will also be able to access childcare services through TANF.
 - B. San Antonio's Housing Authority (SAHA): referral partner for permanent housing. SAHA is working to finalize the Public Housing Priority program for homeless families, which will make available 300 housing units for these families.
 - C. Texas Veterans Commission: to refer qualified individuals in need of employment services.
 - D. Department of Labor, Alamo Workforce Solutions: referrals for employment services available through its Workforce Investment Act Funding, Dislocated Worker Funding, Re-employment Services and Employment Services.
 - E. Bexar County
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:

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The City of San Antonio (COSA) will continue to collaborate with the South Alamo Regional Alliance for the Homeless (SARAH), which is San Antonio's Homeless Continuum of Care, to create a sustainable, community-wide system to provide immediate assistance to homeless and at-risk families. On April 16, 2009, COSA's Department of Community Initiatives convened a stakeholder meeting with SARAH members to discuss the City's proposed plan and determine the most effective and efficient use of HPRP funds.

The City will work closely with SARAH members either as delegate agencies or referral partners. COSA will select for award the most suitable agencies from within the community to provide financial assistance, housing relocation and stabilization services. As a member of SARAH, the City will also ensure the program adopts and promotes efficient and effective approaches to the delivery of services to homeless individuals and those at risk of becoming homeless.

The Department of Community Initiatives will leverage significant resources and programs to provide a comprehensive system of wrap-around services for at-risk families and those leaving homelessness. This includes the Center for Working Families, Rapid Re-Housing, Head Start, Adult Learning Centers, Financial Empowerment Initiatives, Volunteer Income Tax Assistance (VITA), the Individual Development Account (IDA) Program, Financial Literacy Classes, and the Community Action Advisory Board. In addition, caseworkers will provide referrals for identification retrieval, social security cards and driver's license, substance abuse prevention and treatment programs, parenting classes, subsidized childcare, AIDS testing, birth certificates, budget counseling, senior services and various others.

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:

The City of San Antonio's HPRP Plan of Action maintains the 2008-2009 Consolidated Plan's commitment to offer the residents of San Antonio the opportunity to shape the various housing and community development programs into effective, coordinated neighborhood and community development strategies. This plan builds on citizens' participation, needs assessment and performance planning accomplishments in the Consolidated Plan.

The City's plan calls for the creation of a Housing Stabilization Program that will seek to help homeless and at-risk families achieve housing stability through prevention and rapid re-housing strategies. Program participants will go through a workflow navigation triage, which will direct them to an appointment with a caseworker for a complete and comprehensive screening. Based on the specific

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unique needs of each family, referrals will be made to access all services necessary to help stabilize the family, which include but are not limited to financial assistance, housing relocation and stabilization services.

In addition, the City will continue to implement the recommendations in its 10-Year Plan to End Homelessness, including:

1. Implement and expand the use of the HMIS for service delivery design and implementation
2. Monitor all Continuum of Care Homeless Assistance programs
3. Expand outreach and strengthen relationships with chronic homeless and the community at large

Throughout the implementation of this plan, the City will continue to pursue its goal to coordinate and foster strategic partnerships with governmental and community-based agencies in order to leverage resources essential to strengthening families, developing human capital and sustaining a community safety net.

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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	\$ 3,241,724	\$ 1,080,574	\$ 4,322,298
Housing Relocation and Stabilization Services ²	\$ 851,336	\$ 283,778	\$ 1,135,114
Subtotal (add previous two rows)	\$ 4,093,060	\$ 1,364,352	\$ 5,457,412
Data Collection and Evaluation ³			\$ 218,160
Administration (up to 5% of allocation)			\$ 298,714
Total HPRP Amount Budgeted⁴			\$ 5,974,286

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

Date

Title