

## **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](http://www.hudhre.info)). This site will be regularly updated to include HPRP resources developed by HUD and its technical assistance providers.

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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**

<b>Grantee Name</b>	Madison County, IL
<b>Name of Entity or Department Administering Funds</b>	Madison County Community Development (MCCD)
<b>HPRP Contact Person</b> (person to answer questions about this amendment and HPRP)	David A. Harrison
<b>Title</b>	Transitional Housing Mgr./Continuum of Care Coordinator
<b>Address Line 1</b>	130 Hillsboro Ave.
<b>Address Line 2</b>	
<b>City, State, Zip Code</b>	Edwardsville, IL 62025
<b>Telephone</b>	618-692-8940
<b>Fax</b>	618-692-7022
<b>Email Address</b>	<a href="mailto:daharrison@co.madison.il.us">daharrison@co.madison.il.us</a>
<b>Authorized Official</b> (if different from Contact Person)	Honorable Alan J. Dunstan
<b>Title</b>	County Board Chairman
<b>Address Line 1</b>	157 N. Main St.
<b>Address Line 2</b>	Suite 165
<b>City, State, Zip Code</b>	Edwardsville, IL 62025
<b>Telephone</b>	618-296-4341
<b>Fax</b>	
<b>Email Address</b>	
<b>Web Address where this Form is Posted</b>	<a href="http://www.co.madison.il.us/">http://www.co.madison.il.us/</a>

<b>Amount Grantee is Eligible to Receive*</b>	<b>\$566,987</b>
<b>Amount Grantee is Requesting</b>	<b>\$566,987</b>

\*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: Madison County Community Development (MCCD) published a public notice during the last week of April in three daily newspapers and held a public hearing on May 1, 2009 at the MCCD office in Edwardsville, IL. The document was also posted to the Madison County Website at <http://www.co.madison.il.us/>. MCCD also presented information regarding the pending publication of the HUD Notice on HPRP at the Madison County Continuum of Care meeting on March 19, 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:

**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).

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Response: Madison County plans to use the existing structure of homeless prevention providers for the HPRP funds. Homeless Prevention activities in Madison County are coordinated through the Madison County Continuum of Care (CoC) and the Emergency Food and Shelter Board. Planning for the Homeless Prevention funding is a function of the Continuum of Care Emergency Shelter/Homeless Prevention Committee. This committee reviews the homeless prevention policies and operations and makes recommendations to the CoC for revisions to the ongoing activities. The agencies operating homeless prevention financial assistance programs report monthly to the CoC.

Three agencies provide homeless prevention financial assistance in Madison County, IL:  
**Madison County Urban League** serves Northwestern Madison County  
**Madison County Catholic Charities** serves Southwestern Madison County  
**Glen-Ed Pantry** serves Eastern Madison County.

The CoC divides funding between the three agencies according to the poverty populations in the respective service areas. In addition to operating the IDHS Homeless Prevention funds, these same three agencies provide rental assistance using Community Services Block Grant (CSBG) funding and the Federal Emergency Food and Shelter Grant. Through this cooperative arrangement, the CoC is able to provide timely and efficient homeless prevention services while avoiding duplication and misuse of federal, state and local funding.

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: The existing structure of homeless prevention providers in Madison County described in #2 above will greatly facilitate the distribution of the funding to the subgrantees by September 30, 2009. Discussions are currently underway to design an effective method to utilize these funds in an efficient manner. Once the grant agreement between HUD and the County is fully executed, subgrant agreements will be distributed to the three providers for review, signature and return to MCCD prior to 9/30/09.

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: MCCD plans to retain % of the HPRP funds for appropriate administrative expenses and will share the remaining % with subgrantees.

Currently, all MCCD staff are required to complete bi-weekly timesheets which detail the amount of time spent administering each program in the department.

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These timesheets are completed by the employee, verified by the immediate supervisor, and forwarded to the MCCD Accounting Office for appropriate payroll percentage distribution over the fiscal year, while simultaneously ensuring deadline adherence.

MCCD will enter into agreements with subgrantees by September 30, 2009. While the HPRP notice requires 60% of the funds be drawn within two years of the date of the signed grant agreement and 100% within three years, the County has elected to enter into two-year grant agreements with subgrantees. Doing so will guarantee timely expenditure of funds, as well as provide an additional year to process grant ending date extensions for those who struggle to meet the two-year expenditure deadline.

At the time subgrant agreements are issued, appropriate forms and instructions will be provided to request HPRP funds at least monthly. Those requests are verified by HPRP program staff and MCCD Accounting staff and then approved for payment to the appropriate vendor. MCCD tracking of expenditures will occur monthly using the department's Grantee Reporting System database. The following documentation will be reviewed upon monitoring:

- Fiscal – Subgrantee's records must demonstrate a separation of fiscal responsibility. Its fiscal ledger must document all HPRP expenditures for the period in review and must isolate the same by code. Expenditures must be used only for awarded eligible activities. The subgrantee must also provide review copies of all cancelled checks, payroll ledgers, timesheets, vouchers, invoices and/or billings as they relate to HPRP.
- Participant – Subgrantee client files must contain verification that an initial consultation took place between the client and a subgrantee case manager, a homelessness risk assessment was conducted which includes the risk factors considered, and proof that the household served was at or below 50% AMI. Files must also contain subgrantee follow-up documentation.
- Programmatic – Various policies and procedures must be available, including Confidentiality, Termination of Housing Assistance, Conflicts of Interest, Habitability Standards, Nondiscrimination and Equal Opportunity, Community-wide Access, Fair Housing, Lead-Based Paint, Uniform Administrative Requirements, Lobbying and Disclosure, Drug-Free Workplace, Procurement and Equal Participation of Religious Organizations. A review of the subgrantee's outreach plan will be conducted, as well as verification of its assistance to clients with other public benefit programs.

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MCCD will follow up to ensure that any monitoring findings are addressed and corrected in a timely fashion.

### **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: MCCD is currently involved in discussions with the Madison County Employment & Training Department and the Madison County Regional Office of Education to explore the possibility of creating employment opportunities and to ensure the homeless liaisons from the school districts are aware of the additional funding for homeless prevention and re-housing. The three homeless prevention providers will require additional staff to handle the increased workload of 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: As the lead agency of the Madison County Continuum of Care, MCCD convened a meeting of the CoC Emergency Shelter/Homeless Prevention Committee to discuss the HPRP Notice on March 25, 2009. The Emergency Shelter/ Homeless Prevention Committee are comprised of the emergency shelter providers, domestic violence shelters, homeless prevention providers and other local service providers. The committee made a recommendation to the CoC that the existing providers be granted the HPRP funding so as not to “reinvent the wheel”. The CoC has an effective working relationship with the providers of mainstream resources including the two local IL Department of Human Services offices, Social Security Administration, three local housing authorities and Head Start.

MCCD held a meeting with the three homeless prevention agencies on April 29, 2009 to further discuss the details of the HPRP funding. All parties agreed that the program guidelines would be applied equally in their respective jurisdictions.

MCCD maintains an email listserve where providers can communicate any needs, concerns or issues relative to the provision of services throughout Madison County. This has proven effective in solving difficult cases and collaborating to serve at-risk populations. The Madison County Community Collaboration serves as the Mainstream Resources Committee for the CoC and is co-chaired by MCCD.

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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: Madison County Community Development has been instrumental in developing a comprehensive system of housing and service opportunities for homeless and at-risk populations in the county. The MCCD is one of six IL Department of Human Services Emergency Food & Shelter Grant recipients in the county. MCCD operates a HUD SHP Transitional Housing Program and is the lead applicant for the HUD Supportive Housing Program funding competition.

The Madison County Consolidated Plan includes as the third priority a discussion of the need for homeless prevention and services. The CoC continues to build the network of mainstream resources to provide emergency financial assistance with rent, mortgages, utilities and medicine. Other mainstream resources are accessed to provide counseling, case management, life skills training and legal services to prevent homelessness.

The HPRP dollars available to Madison County will not only fund further rental and utility assistance, but also enable the CoC to make available a more comprehensive program to work in concert with the IDHS prevention program. Together these programs will more effectively address a multitude of long-term needs of the homeless and at-risk population with the goal of significantly reducing homelessness.

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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.

<b>HPRP Estimated Budget Summary</b>			
	<b>Homelessness Prevention</b>	<b>Rapid Re-housing</b>	<b>Total Amount Budgeted</b>
Financial Assistance <sup>1</sup>	\$164,427	\$164,426	\$328,853
Housing Relocation and Stabilization Services <sup>2</sup>	\$79,378	\$119,067	\$198,445
<b>Subtotal</b> (add previous two rows)	<b>\$243,805</b>	<b>\$283,493</b>	<b>\$527,298</b>
Data Collection and Evaluation <sup>3</sup>			\$11,340
Administration (up to 5% of allocation)			\$28,349
<b>Total HPRP Amount Budgeted<sup>4</sup></b>			<b>\$566,987</b>

<sup>1</sup>Financial 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.

<sup>2</sup>Housing 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.

<sup>3</sup>Data 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.

<sup>4</sup>This 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

Madison County Board Chairman