

## **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. 35013520). 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>	South Carolina Governor's Office
<b>Name of Entity or Department Administering Funds</b>	Office of Economic Opportunity (OEO)
<b>HPRP Contact Person</b> (person to answer questions about this amendment and HPRP)	Margaret Gibson
<b>Title</b>	ESG Senior Manager
<b>Address Line 1</b>	1205 Pendleton Street
<b>Address Line 2</b>	
<b>City, State, Zip Code</b>	Columbia, SC 29201
<b>Telephone</b>	(803) 734-1266
<b>Fax</b>	(803) 734-0356
<b>Email Address</b>	mgibson@oepp.sc.gov
<b>Authorized Official</b> (if different from Contact Person)	Ashlie Lancaster
<b>Title</b>	OEO Director
<b>Address Line 1</b>	1205 Pendleton Street
<b>Address Line 2</b>	
<b>City, State, Zip Code</b>	Columbia, SC 29201
<b>Telephone</b>	(803) 734-0425
<b>Fax</b>	(803) 734-0356
<b>Email Address</b>	alancaster@oepp.sc.gov
<b>Web Address where this Form is Posted</b>	<a href="http://www.oepp.sc.gov/oeo/">http://www.oepp.sc.gov/oeo/</a>

<b>Amount Grantee is Eligible to Receive*</b>	<b>\$ 11,136,176</b>
<b>Amount Grantee is Requesting</b>	<b>\$ 11,136,176</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:

The SC Governor's Office of Economic Opportunity (OEO) has adhered to the citizen participation plan contained within the State's Consolidated Plan regarding this proposed substantial amendment by making this document available for public review and comment throughout the State. In order to emphasize the participation of low- and moderate-income persons, including minorities, non-English speaking persons and persons with disabilities, this document is being made available for review at the State's councils of government, continuums of care, and potential subgrantee applicants with the intention that these entities notify local governments and citizens in other regions of opportunities to provide input to this substantial amendment to the Consolidated Plan. The State will notify citizens about the dates of the substantial amendment public comment period in the following newspapers: Greenville News, The State in Columbia and the Charleston Post and Courier. This substantial amendment will also be available electronically at [www.oepp.sc.gov/oeo](http://www.oepp.sc.gov/oeo). As allowed by the HPRP Notice the time period for citizens to comment on the substantial amendment shall be reduced to twelve days, and as the State's citizens participation plan does not include provisions requiring a second public comment period on subgrantee selection, the public comment period will be limited to one regarding the substantial amendment only.

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.

Response to this question is pending the outcome of the public comment period.

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:

Response to this question is pending the outcome of the public comment period.

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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: \_\_\_\_\_)

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

Response:

OEO will formulate a request for applications (RFA) based upon the HPRP Notice and other HUD guidance regarding this program. This RFA will be distributed throughout the State to potential subgrantees to include but not limited to continuums of care, emergency and transitional shelters, councils of government, local governments, community action agencies, and other providers of services targeted to homeless and "at-risks" for becoming homeless individuals and families. The State's program will include both homeless prevention and rapid re-housing components that will be tracked according to the subgrantees selected. Subgrantee selection will be determined based upon the average points awarded to applications through a review panel. An application will be scored based upon how it exhibits management capacity, need for this funding, and strict adherence to guidelines regarding the timely expenditure of funding and reporting. Other issues will also be considered such as the applicant's proven record in administering programs similar to HPRP, past performance of grant objectives in other programs including ESG, and exhibited adherence to the program guidelines of other federally funded programs.

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:

Through the aforementioned competitive application process, OEO will make subgrantee selections and notify the selected entities by September 16, 2009 of their grant allocation. OEO will conduct a workshop on the State HPRP guidelines by September 30, 2009 during which grant agreements will be available for execution.

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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:

OEO will monitor its use of the administrative funding on at least a monthly schedule through coordination and collaboration with the Office of Executive Policy and Programs' fiscal staff. Similarly, OEO will monitor subgrantee use of HPRP funding on at least a monthly basis through their submission of financial status reports that will contain at least the minimum data elements as outlined by HUD in the HPRP Notice. Additionally, OEO will conduct on-site monitoring visits of subgrantees in order to further discuss financial matters as well as to review program participant files to ensure eligibility and adherence to program guidelines as described in the HPRP Notice and by the State.

The monthly monitoring of subgrantee financial status reports and other communications will be utilized to assist OEO in meeting the expenditure guidelines as outlined in the HPRP Notice. In order to ensure that the State is able to expend 60% of its allocation within the twenty-four month period, OEO will provide technical assistance to grantees who do not meet monthly and quarterly expenditure targets. If, after a limited period of time, a subgrantee is unable to exhibit marked improvement in expending funds, its balance in excess of the percentage of elapsed time within the program year, will be recaptured and distributed to other subgrantees who have demonstrated expenditures in excess of the expected percentages.

### **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 OEO is fortunate in that it is also the administrator of funding for the Community Services Block Grant, the Low-Income Home Energy Assistance Program, and the Weatherization Assistance Program, all which serve similar target populations. In addition to these programs, only two of which received additional funding under the American Recovery and Reinvestment Act (ARRA) of 2009, the OEO plans to collaborate with the state recipient of TANF funding, the SC Department of Social Services (DSS), and the state recipient of Workforce Investment Act funding, the SC Department of Commerce. OEO understands that these ARRA programs include provisions that can be utilized in implementing HPRP to enhance services to homeless individuals and families and those at-risk of becoming homeless. Finally, contact will be initiated with the recipients of the Emergency Food and Shelter program ARRA funding

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to discuss stop-gap service provision measures for HPRP recipients through cooperative agreements with subgrantees.

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:

OEO plans to collaborate with continuums of care and mainstream resources regarding HPRP activities in a number of ways. For instance, all continuums of care and any known entities providing services to homeless individuals and families or persons at-risk for becoming homeless will be invited to participate in the competitive grant process. Also, support will be offered for HMIS and OEO will collaborate with agencies and continuums of care in order to collect the required data elements for reporting. Additionally, all applicants will be required to include in their applications for HPRP funding evidence provided by the CoC of their participation in the continuum and its HMIS, as well as a letter of support from their continuum for the grant for which they are applying under HPRP.

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:

Exhibit III-30 in the SC Consolidated Plan provides that “nearly half, (49% of all low income households) have a housing problem and 45% have a cost burden...[and that]...nearly one out of every four low income households has a severe cost burden. Additionally, it provides that “in 2004, there were 64,696 extremely low income renter households, or 15% of all renter households. 63% of those households are considered extremely cost burdened. A household is considered extremely burdened when it spends more than 50% of its income on housing. During the same time period there were 39,652 very low renter households or 9%. Exhibit IV-4, Homeless Needs that provides the results from a community survey indicates that the top two needs expressed were from emergency shelters at 58% and homeless prevention at 56%.

This information and more correlates into the formulation of the State priority needs. Priority Need 1 is affordable housing and Objective 1a for this need is to provide new or improved accessibility to housing and supportive services for low and moderate income persons. Priority Need 3 is to provide a sustainable living environment and Objective 3a for this need is to provide a suitable living environment through new or improved accessibility to public facilities, services, infrastructure, or other critical community needs for low and moderate income persons. The eligible activities through HPRP will allow the State to better meet these needs by providing more individuals and families with a broader array of services and supports than what is normally available.

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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 Rehousing</b>	<b>Total Amount Budgeted</b>
Financial Assistance <sup>1</sup>	\$ 2,505,640	\$ 2,505,640	\$ 5,011,280
Housing Relocation and Stabilization Services <sup>2</sup>	\$ 2,505,640	\$ 2,505,640	\$ 5,011,280
<b>Subtotal</b> (add previous two rows)	<b>\$ 5,011,280</b>	<b>\$ 5,011,280</b>	<b>\$ 10,022,560</b>
Data Collection and Evaluations <sup>3</sup>			\$ 556,808.00
Administration (up to 5% of allocation)			\$ 556,808.00
<b>Total HPRP Amount Budgeted<sup>4</sup></b>			<b>\$ 11,136,176</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)

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Signature/Authorized Official

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Date

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Title

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