

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	City of Peoria, Illinois
Name of Entity or Department Administering Funds	Department of Planning and Growth Management – Community Development Divisions
HPRP Contact Person (person to answer questions about this amendment and HPRP)	Ross Black
Title	Planning and Growth Management Assistant Director
Address Line 1	456 Fulton, Suite 402
Address Line 2	Twin Towers Building
City, State, Zip Code	Peoria, IL 61602
Telephone	309-494-8601
Fax	309-494-8680
Email Address	rblack@ci.peoria.il.us
Authorized Official (if different from Contact Person)	Henry Holling
Title	Interim City Manager
Address Line 1	419 Fulton
Address Line 2	
City, State, Zip Code	Peoria, IL 61602
Telephone	309-494-8524
Fax	309-494-8559
Email Address	hholling@ci.peoria.il.us
Web Address where this Form is Posted	www.ci.peoria.il.us

Amount Grantee is Eligible to Receive*	\$790,404
Amount Grantee is Requesting	\$790,404

*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:

In accordance with guidance found in the HPRP Notice, a 12-calendar day comment period was held from April 24, 2009 to May 5, 2009 regarding the City's Substantial Amendment. Public hearings, to obtain community-wide input, were held on Thursday, April 30th at 9:30 AM and 5:30 AM. A legal notice published in the Peoria Journal Star, the area newspaper with the largest distribution, advertised the comment period and public hearings.

The City consulted with and received a proposal from the Heart of Illinois Continuum of Care (HOICOC) regarding the use of the HPRP funds.

Further, at the April 28, 2009 regular meeting of the Peoria City Council, an agenda item recommending the use of the HPRP dollars was approved and the floor was granted to the members of the HOICOC for comments prior to the motion. Those comments received are summarized in Question 3.

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:

The City has received written and verbal comments during the 12-day comment period and held public hearings.

In summary is a list of received comments regarding the City's Substantial Amendment:

- a. One-time utility assistance without case management or other housing assistance is not the intent of the HPRP plan/request for funds;
- b. There are multiple resources already present in the Peoria community for utility assistance including \$5,000,000 in LIHEAP, eligibility for which must be expended before these funds can be used;

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

- c. Long-term stability can only come with case management and life skill training that increases a household's skill level and ability to make sound financial decisions;
- d. HPRP funds, if used as intended, can provide an opportunity for systems transformation, positioning our community to be ready to respond to future funding opportunities that will bring more resources to Peoria residents.

The City appreciates the views and comments expressed during the comment period.

Below are the City's responses to the list of comments received:

- a. In the Notice, various activities were listed as eligible uses for HPRP funds; those intended to serve households who would otherwise become homeless, many due to the economic crisis, without the assistance. HUD, through the Notice, did not set statutory guidance, with the exception of administrative costs, regarding the funding levels for each eligible use. HUD allows grantees the discretion to develop programs that meet locally-defined need and expects grantees to target and prioritize resources to serve households that are most in need of this temporary assistance and are most likely to achieve stable housing, outside of HPRP, after the program concludes.
In accordance with this guidance, the City, with the allocation of its HPRP funds, is responding to the recent local companies lay-offs and the community wide impact on a household's ability to maintain its current housing. The City found it prudent to focus on homeless prevention resources as local households prioritize expenses during this difficult economic time. Furthermore, a survey of local service providers who currently provide homeless prevention assistance indicated that need is great, they could use more funds and have the organizational capacity to administrator additional funds effectively. Many of these surveyed service providers are members of the Heart of Illinois Continuum of Care.
- b. While the Peoria community is very fortunate to be the recipient of additional LIHEAP funds, it is anticipated through the City's consultations with the local utility provider, AmerenCILCO, that additional need exists far beyond the LIHEAP funds. The City will coordinate all HPRP efforts with LIHEAP funds and require subgrantees to refer eligible households to LIHEAP if appropriate.
- c. As per guidance found in the HPRP Notice, HPRP assistance is not intended to provide long-term support for program participants, nor will it be able to address all the financial and supportive services needs of households that affect housing stability.
- d. The City will continue to advocate for positioning of our community for future funding opportunities that will bring more resources to Peoria residents. The City supports the Heart of Illinois Continuum of Care and their efforts to receive and utilize an additional \$1.1 million of HPRP funds directly from the State of Illinois.

The City has consulted with the Heart of Illinois Continuum of Care during the creation of the Substantial Amendment. As such, the City Council granted the Continuum members the floor at a regularly scheduled Council meeting when HPRP funds were discussed. Comments received during a public exchange between a City Council member and Continuum member indicated that the local Homeless Management Information System

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

(HMIS) does not function well. Therefore, the City further retains that a straightforward approach to utilize the HPRP funds through a homeless prevention activity already administered by local service providers is the most effective and efficient use of funds.

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 City will select subgrantees based upon a Request for Qualifications (RFQ) process. Using HUD guidance and prescribed timeline in the HPRP Notice, the City will advertise for RFQs during the month of July 2009; upon HUD review of the City's Substantial Amendment.

Homeless prevention, in the form of utility assistance, is the City's objective for the HPRP funds. Therefore, in reviewing the submitted RFQs, the City will consider the potential subgrantees ability to:

- Assume new funding for utility assistance without creating additional staff positions or procedures;
- Have previous experience in providing utility assistance to individuals;
- Demonstrate the ability to expend the funds within a 18 to 24 month period once awarded;
- Be able to identify those at the highest risk of homelessness and the target those who would likely become homeless without assistance.

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:

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

In accordance with the City's method of subgrantee selection described in #2, all RFQ submissions will be reviewed, approved and subgrantee agreements prepared prior to HUD's issuance of a grant agreement. Once the grant agreement between HUD and the City has been fully executed, subgrantee agreements will be distributed to subgrantees for review, signature and return to the City prior to 9/30/09.

The rating and ranking criteria, as well as identifying those individuals who will review the RFQs have yet to be determined. The City will begin that process formulation during the month of June 2009.

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 plans to retain 3% of the HPRP funds for appropriate administrative expenses and will share the remaining 2% with subgrantees.

The City will enter into legally binding agreements with subgrantees by September 30, 2009. While the HPRP notice provides that 60% of the City's HPRP funds must be drawn within two years of the date of the signed grant agreement and 100% within three years, the City 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.

In addition, the HPRP fund timeline restrictions will be a highly regarded provision throughout the aforementioned RFQ process. The City will carefully review potential subgrantees demonstration of abilities to expend the funds within an 18 to 24 month time period.

At the time subgrantee agreements are issued, appropriate forms and instructions will be provided to request HPRP funds from the City at least monthly. City HPRP Program staff and Finance staff will verify those requests prior to the approval for payment. The City's tracking of expenditures will use the Government Management and Budgetary Accounting System (GMBA) and HUD Integrated Disbursement and Information System (IDIS), as currently used for ESG fund reimbursement. Furthermore, monitoring by the City of the subgrantees participation in the local Homeless Management and Information System (HMIS) will be conducted monthly and in accordance with the, yet to be released from HUD, HMIS technical standards.

Upon expenditure of an appropriate portion of HPRP funds, City HPRP Program staff will perform fiscal, participant and programmatic monitoring, which will occur either on-site or

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

through desk monitoring using an approved review tool. The following documentation will be reviewed upon monitoring:

5. 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.
6. Participant – Subgrantee client files must contain verification that an initial consultation took place between the client and a subgrantee, a homelessness risk assessment was conducted which includes the risk factors considered, proof that the household served was at or below 50% AMI and referral assistance to, if applicable, other public benefit programs.
7. Programmatic – Various policies and procedures must be available, including Confidentiality, Conflicts of Interest, Nondiscrimination and Equal Opportunity, Fair Housing, Uniform Administrative Requirements, Lobbying and Disclosure, Drug-Free Workplace, Procurement and Equal Participation of Religious Organizations.

The City will ensure that any subgrantee monitoring findings are addressed, corrected and resolved in a timely fashion as determined by the City.

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:

As a HPRP subgrantee, providers must demonstrate in their submitted RFQ:

- A referral process, in place, that assists clients with other public benefit programs such as TANF, unemployment benefits, Illinois WorkNet Centers, the Illinois All Kids Program, medical and disability assistance;
- The wherewithal to access the Illinois Department of Human Services (DHS) food stamp application and distribute to eligible households;

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

- Screen every HPRP household to determine if LIHEAP assistance is appropriate, prior to the expenditure of HPRP funds;
- To the fullest extent possible, coordinate with local offices of federal recovery programs to ensure resources are utilized to reach those most in need.

During the creation of the Substantial Amendment, the City made contact with AmerenCILCO, the local utility provider, to request their partnership with HPRP funds and reducing energy costs for Peoria residents. Because of this partnership, Ameren has generously committed to providing funding toward the existing City program that provides furnaces to low income homeowners; the details regarding the donation will be further explored. These new furnaces will replace non-working furnaces, and will be of a higher efficiency. Annually, the City provides funding for this program, which is always fully subscribed, and CDBG funds used for the program are not sufficient to meet the need. HPRP regulations do not require leverage or match. However, in all cases, when an opportunity for partnership to better serve the Peoria residents presents itself, it is incumbent upon the City to attempt to stretch finite funds as far as possible.

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 City has consulted with the Heart of Illinois Continuum of Care during the creation of the Substantial Amendment. It is anticipated that member organizations of the Continuum will submit RFQ and be likely subgrantees of the City HPRP funds. While proposals of the use of the HPRP funds may differ, both parties agree that homeless prevention in the form of utility assistance is needed. The City will continue to support the Heart of Illinois Continuum of Care's receipt and utilization of the additional \$1.1 million dollars of HPRP Funds received directly from the State of Illinois. The City would welcome the opportunity to collaborate the entitlement HPRP and State HPRP funds to best serve Peoria residents.

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:

HPRP grant funds for financial assistance are directly consistent with the City's Consolidated Plan. As stated in the Plan, the City's strategy to prevent homelessness for individuals and families with children, who are at imminent risk of becoming homeless, include assisting programs geared towards the goal of preventing the probable causes of homelessness. These programs include rent, mortgage and utility assistance, legal interventions regarding illegal evictions or utility shut-offs, case management and counseling. In addition, Subsistence Payments are given high priority for public service initiatives in the Consolidated Plan.

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

The City receives and utilizes Emergency Shelter Grant (ESG) funds to address homeless needs and to prevent homelessness. The City invests all awarded ESG funds to local service providers that serve Peoria's homeless and near homeless individuals and families.

Together, with the HPRP and ESG funds, these activities will continue to effectively address a multitude of needs of the homeless and at-risk population with the goal of significantly reducing homelessness within the Peoria community.

**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	\$750,883.80		\$750,883.80
Housing Relocation and Stabilization Services ²			
Subtotal (add previous two rows)	\$750,883.80		\$750,883.80

Data Collection and Evaluation ³	
Administration (up to 5% of allocation)	\$ 39,520.20
Total HPRP Amount Budgeted⁴	\$790,404

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

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

APPENDIX A

DCEO Funding Distribution of the State Program's Allocation

Continuum of Care		Allocation
500	McHenry County CoC	\$498,708
501	Rockford/ Winnebago/ Boone Counties CoC	\$1,041,707
502	Waukegan/ North Chicago/ Lake County CoC	\$1,172,658
503	Champaign/ Urbana/ Rantoul/ Champaign County CoC	\$634,345
504	Madison County CoC	\$752,471
505	Evanston CoC	\$0
506	Joliet/ Bolingbrook/ Will County CoC	\$974,401
507	Peoria/ Pekin/ Fulton/ Peoria/ Tazewell/ Woodford CoC	\$1,115,323
508	East St. Louis/Belleville/Saint Clair County CoC	\$851,137
509	DeKalb City & County CoC	\$282,280
510	Chicago CoC	\$0
511	Cook County CoC	\$0
512	Bloomington/Central Illinois CoC	\$1,962,169
513	Springfield/Sangamon County CoC	\$592,644
514	DuPage County CoC	\$1,296,342
515	South Central Illinois CoC	\$1,453,061
516	Decatur/Macon County CoC	\$395,308
517	Aurora/Elgin/Kane County CoC	\$1,188,345
518	Rock Island/Moline/Northwestern Illinois CoC	\$2,425,888
519	West Central Illinois CoC	\$896,141
520	Southern Illinois CoC	\$2,144,979
		\$19,677,909

Notes on Funding Formula

Formula Distribution Notes:

- ¹ DCEO will distribute HPRP funding by formula developed, to the 18 CoC regions outside of the Cook County, Chicago areas. Three CoC regions that comprise the Cook County region as a whole (Chicago, Cook, Evanston) will receive \$41,215,956 collectively of Illinois' 70 million in HPRP funding as HPRP

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