



# **FY 2008 Ohio Consolidated Plan Homelessness Prevention and Rapid Re-Housing Program Substantial Amendment**

---

**Ted Strickland, Governor of Ohio**

**Lee Fisher, Lt. Governor of Ohio**

**Lisa Patt-McDaniel, Interim Director, Ohio Department of Development**

**A. General Information**

<b>Grantee Name</b>	State of Ohio
<b>Name of Entity or Department Administering Funds</b>	Ohio Department of Development Office of Housing and Community Partnerships
<b>HPRP Contact Person</b> (person to answer questions about this amendment and HPRP)	Michael A. Hiler
<b>Title</b>	Office Chief Office of Housing and Community Partnerships
<b>Address Line 1</b>	77 South High Street, 24 <sup>th</sup> Floor
<b>Address Line 2</b>	P.O. Box 1001
<b>City, State, Zip Code</b>	Columbus, Ohio 43216
<b>Telephone</b>	(614) 466-2285
<b>Fax</b>	(614) 752-4575
<b>Email Address</b>	<a href="mailto:Michael.Hiler@development.ohio.gov">Michael.Hiler@development.ohio.gov</a>
<b>Authorized Official</b> (if different from Contact Person)	Lisa Patt-McDaniel
<b>Title</b>	Interim Director Ohio Department of Development
<b>Address Line 1</b>	77 South High Street, 29 <sup>th</sup> Floor
<b>Address Line 2</b>	P.O. Box 1001
<b>City, State, Zip Code</b>	Columbus, Ohio 43216
<b>Telephone</b>	(614) 466-3379
<b>Fax</b>	(614) 644-0745
<b>Email Address</b>	<a href="mailto:Lisa.Patt-McDaniel@development.ohio.gov">Lisa.Patt-McDaniel@development.ohio.gov</a>
<b>Web Address where this Form is Posted</b>	<a href="http://development.ohio.gov/cdd/ohcp/hprp.htm">http://development.ohio.gov/cdd/ohcp/hprp.htm</a>

<b>Amount Grantee is Eligible to Receive*</b>	<b>\$26,205,724</b>
<b>Amount Grantee is Requesting</b>	<b>\$26,205,724</b>

\*Amounts are available at <http://www.hud.gov/recovery/homelesspreventrecov.xls>

**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: On April 20-22, 2009, during the Coalition on Homelessness and Housing (COHHIO) Annual Conference, the Ohio Department of Development (ODOD) distributed 350 notices announcing that, on April 30, 2009, ODOD would be posting the Draft FY 2008 Ohio Consolidated Plan Homelessness Prevention and Rapid Re-Housing Program (HPRP) Substantial Amendment on <http://development.ohio.gov/cdd/ohcp/hprp.htm> and requesting public comment during the period May 1-12, 2009. Also on April 20, 2009, ODOD direct mailed approximately 300 copies of the same notice to potential applicants and their affiliates. On April 30, 2009, ODOD posted the Draft FY 2008 Ohio Consolidated Plan HPRP Substantial Amendment on <http://development.ohio.gov/cdd/ohcp/hprp.htm>. On May 1, 2009, ODOD published a legal notice in 13 newspapers across Ohio announcing the posting of the Draft FY 2008 Ohio Consolidated Plan HPRP Substantial Amendment on <http://development.ohio.gov/cdd/ohcp/hprp.htm> and requested public comments

during the period May 1-12, 2009. In addition, ODOD notified the following entities of the public comment period and requested that the appropriate constituencies be notified of the public comment period: the Interagency Council on Homelessness and Affordable Housing (ICH&AH) Policy Committee, which consists of representatives of 15 state agencies and seven related-stakeholder organizations; the County Commissioners Association of Ohio (CCAO); COHHIO; the Ohio Job and Family Services Director's Association; and the Ohio Department of Education.

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.

Public Comment: Thank you for the opportunity to comment on the Draft FY 2008 Ohio Consolidated Plan for the Homelessness Prevention and Rapid Re-Housing Program. We offer these comments on behalf of the six legal services regions in Ohio. We are pleased that Ohio is committing substantial resources to this important area. However, we strongly urge you to designate a direct and specific statewide funding level for the provision of legal services to address these issues. We are concerned that legal services are not directly funded, but must be allocated through each of the Continuum of Care committees across the state. This will make access to legal services a patchwork of disconnected options lacking statewide uniformity and unnecessarily increase the administrative costs of providing these services. We are also concerned that the draft includes provision of legal services only as one of six activities in the broad grouping of "Housing Relocation and Stabilization Services" rather than a separate and independent funding category. We believe that this understates the need for direct legal services for low-income Ohioans in need of re-housing or are, or are at risk of becoming, homeless. A separate designation will ensure that funding is directed to a service component commonly overlooked in traditional allocations of dollars to prevent homelessness. The provision of legal services is often the single most important service that can be provided to individuals and families to protect and maintain their housing and stability. Such services could include eviction prevention, unsafe housing conditions, preventing loss of housing subsidies (or subsidized housing), protecting victims of domestic violence, maintaining/restoring safety net incomes that are necessary to pay rent, credit repair, displaced children/youth & urban/rural housing development. Including legal services only as one of the six options for services and requiring multiple applications across service territories will not adequately assure their availability to assist needy Ohioans across the state; there should be a separate funding category for it. Thank you for the opportunity to comments on the draft plan. Please let us know if you have questions or would like to discuss this further.

### **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: \$1 million set aside for the Family Homelessness Prevention Pilot Program)

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

Response: ODOD will allocate \$23,895,500 of the Ohio HPRP funds using a formula based on poverty and unemployment rates. To calculate the need-based allocations, ODOD obtained:

- poverty and civilian labor force data from Census 2000 Summary File 3, for Ohio's 88 counties; and

- annual average civilian labor force estimates by county for 2008 from the Local Area Unemployment Statistics (LAUS) Program, Ohio Labor Market Information, Ohio Department of Job and Family Services.

The allocation is based on a two-tiered, 50% - 50% weighting of poverty and unemployment according to the following formula:

Tier One -- HUD HPRP direct city/county recipient or an Ohio county, which includes a HUD HPRP direct recipient community

$$\left( \frac{\text{number of persons in poverty in a Tier One county}}{\text{number of persons in poverty in the Tier One counties}} * \frac{\text{poverty rate in a Tier One county}}{\text{poverty rate in the Tier One counties}} * 0.5 \right) + \left( \frac{\text{number of unemployed persons in a Tier One county}}{\text{number of unemployed persons the Tier One counties}} * \frac{\text{unemployment rate in the Tier One county}}{\text{unemployment rate in the Tier One counties}} * 0.5 \right)$$

Tier Two -- Balance of state counties

$$\left( \frac{\text{number of persons in poverty in the Tier Two county}}{\text{number of persons in poverty in the Tier Two counties}} * \frac{\text{poverty rate in a Tier Two county}}{\text{poverty rate in the Tier Two Counties}} * 0.5 \right) + \left( \frac{\text{number of unemployed persons in the Tier Two county}}{\text{number of unemployed persons in the Tier Two counties}} * \frac{\text{unemployment rate in the Tier Two county}}{\text{unemployment rate in the Tier Two counties}} * 0.5 \right)$$

The relative poverty and unemployment rates -- the right-hand terms in the equation -- are constrained to be no smaller than 0.7 and no greater than 1.3. In so far as this formula does not produce a 100% allocation, it is necessary to apply a pro-rata adjustment to make the allocation total to 100%.

In addition, ODOD will award \$1 million of the Ohio HPRP funds through the Family Homelessness Prevention Pilot Program to five nonprofit organizations to identify families most at risk of homelessness in six counties (Fayette/Pickaway, Franklin, Lucas, Hamilton and Montgomery) and provide services to prevent the loss of housing. The program originated in December 2007, when the award recipients competed for limited state funding to implement the pilot program. It is anticipated that approximately 800 families/households consisting of 2,000 persons will be assisted by the program at the conclusion of the grant period – September 30, 2009. The targeted families have one or more dependent children; have incomes at or below 200 percent of the poverty level; are at imminent risk of becoming homeless; and need access to supportive services to prevent homelessness and develop long-term housing stabilization. Due to the successfulness of this program, ODOD, upon the recommendation of the Technical Assistance Collaborative, a nonprofit organization that works to achieve positive outcomes on behalf of people with disabilities and other special needs, set aside \$1 million of the HPRP funds to continue this program for one year.

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: On April 20, 2009, ODOD notified potential Ohio HPRP applicants that the Ohio HPRP Application Training is scheduled for June 1, 2009. Immediately following the submission of the Draft FY 2008 Ohio Consolidated Plan HPRP Substantial Amendment to the U.S. Department of Housing and Urban Development (HUD), ODOD will issue letters to the Continuum(s) of Care (CoCs) in the eligible Ohio HPRP Service Areas notifying them of the Ohio HPRP Service Area formula funding allocations, the need to collaborate with other CoCs, if necessary, to provide the name of the approved Ohio HPRP applicant and with the local Board(s) of County Commissioners to certify the HPRP applicant to ODOD by May 29, 2009. On June 1, 2009, ODOD will conduct the Ohio HPRP Application Training and notify eligible applicants of the July 14, 2009 HPRP application submission deadline. On July 6, 2009, ODOD will issue the Family Homelessness Prevention Pilot Program application and announce the July 24, 2009 application submission deadline. ODOD will review the HPRP and Homelessness Prevention Pilot Program

applications on or before August 17, 2009 and issue grant agreements on or before September 1, 2009 (if HUD issues a grant agreement to ODOD on or before September 1, 2009). Award recipients will be required to execute and return the grant agreements within 10 days. All funds will be obligated by September 30, 2009. Subsequently ODOD will monitor, through HMIS and the quarterly reporting process, the expenditure of Ohio HPRP funds to ensure that 60 percent of the Ohio HPRP funds are expended within the first two years of the grant period and that 100 percent of the Ohio HPRP funds are expended within three-year grant period.

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: To ensure the effective and timely use of Ohio HPRP grant funds on eligible activities, Ohio HPRP award recipients will be required to enter all HUD-required data elements into the appropriate HMIS and ODOD will only allow the expenditure of Ohio HPRP grant funds on eligible activities as outlined in the HPRR Notice. In addition, ODOD will require Ohio's HPRP subgrantees to provide quarterly performance reports, including both quarterly and cumulative data, to ODOD, which will include, but not be limited to, the total amount of HPRP funds received, the total amount of funds allocated to each of the eligible activity categories, the number of unduplicated individuals and families served; the demographic characteristics of persons served; the estimated numbers of new jobs created and retained; and the challenges of effective program operation. ODOD will set milestones for the award recipients and review quarterly reports based on those milestones to ensure timely expenditure of funds on eligible activities. If it appears that an award recipient is not meeting the milestones, ODOD will immediately contact the award recipient and intervene to ensure the success of the local program. Award recipients that are subsequently unable to expend the Ohio HPRP funds in a timely and appropriate manner will be provided intensive, hands-on technical assistance but, ultimately, ODOD may be required to terminate the Ohio HPRP grant agreement with the award recipient in order to ensure the effective and timely use of Ohio HPRP funds by reallocating the funds to a substitute award recipient. Finally, ODOD will report to HUD on a quarterly basis, both quarterly and cumulative data, regarding the expenditure and successes of the Ohio HPRP funds, including the administrative funds expended by the state.

#### **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: ODOD will continue to collaborate with state agencies/statewide organizations, including the Ohio Job and Family Services Directors' Association, ICH&AH Policy Committee, CCAO, COHHIO and Ohio Department of Education, that work directly with local agencies that service similar target populations and received ARRA of 2009 funds from other federal agencies.

Also, ODOD will require Ohio HPRP recipients to collaborate with:

- **52 Community Action Agencies (CAAs)** across the state, which are nonprofit organizations organized to reduce poverty and to help low-income people become self-sufficient. The CAAs receive funding from a variety of sources, including the U.S. Departments of Agriculture, Education, Energy, Health and Human Services and Housing and Urban Development to provide clients with employment, emergency services, education, nutrition, income management, housing, health and family development services.
- **The Ohio Benefit Bank**, consisting of 87 clinics in Ohio's 88 counties, which works daily with local agencies servicing similar target populations to help clients to check potential eligibility for other support benefits, such as health care coverage, home energy assistance, child care subsidies, food stamps, income tax benefits, job training and extended unemployment benefits.

In addition, ODOD will collaborate with **Ohio HPRP** recipients, consisting of nonprofit organizations, local governments and Public Housing Authorities, through e-mail, conference calls, meetings and web updates to ensure that the local agencies are aware of the variety of ARRA funding sources and opportunities for collaboration. For example, ensuring that school liaisons are accessing HPRP resources and serve as an active referral source for an underserved population.

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: Immediately following the submission of the substantial amendment to HUD, ODOD will notify the Ohio Continuums of Care (CoCs) of the funding allocation level in each HPRP Service Area. Subsequently, the CoC(s) must provide ODOD with a letter of support for an HPRP administering agency. In addition, Board(s) of County Commissioners in the HPRP Services Areas must certify to ODOD that the administering agency is approved. In addition, on June 1, 2009, ODOD will conduct an Ohio HPRP Application Training to provide CoC representatives and the selected award recipients with direct training regarding the HPRP eligible activities; encourage applicants to demonstrate leveraging of mainstream resources to implement the local HPRP project(s) in the Ohio HPRP grant application; and describe the application rating criteria, reporting requirements and importance of local collaboration to ensure success of the program at the local level.

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: Currently, ODOD administers the Homeless Assistance Grant Program, which provides grants to eligible applicants for emergency shelter, transitional housing, direct housing and permanent supportive housing activities that meet the housing needs of homeless and low-income families and individuals. In addition, ODOD administers the Housing Opportunities for Persons With AIDS Program, which provides eligible nonprofit organizations and units of local government with funds to devise long-term, comprehensive strategies for meeting the housing and supportive service needs for persons with AIDS or HIV-related diseases. Both programs, which are described fully in the Ohio Consolidated Plan, target low-income individuals. The Ohio HPRP will enable ODOD to provide grants to eligible applicants who are interested in providing financial assistance and services to either prevent individuals and families from becoming homeless or help those who are experiencing homelessness to be quickly re-housed and stabilized. The funding of all three programs will form an overarching, complementary and holistic approach to helping the neediest residents in Ohio by enabling successful Ohio HPRP applicants to implement an effective and comprehensive homelessness prevention strategy throughout the state.

**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>	\$8,902,600	\$3,815,400	\$12,718,000
Housing Relocation and Stabilization Services <sup>2</sup>	\$7,410,000	\$3,167,500	\$10,577,500
<b>Subtotal</b> (add previous two rows)	<b>\$16,312,600</b>	<b>\$6,982,900</b>	<b>\$ 23,295,500</b>

Data Collection and Evaluation <sup>3</sup>	\$1,600,000
Administration (up to 5% of allocation)	\$1,310,224
<b>Total HPRP Amount Budgeted<sup>4</sup></b>	<b>\$26,205,724</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.”

\*The State of Ohio reserves the right to modify the estimated budget summary, after receipt of the HPRP applications from potential award recipients and review of the expenditure rates during the expenditure period.

**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)



May 14, 2009  
Date

Ohio Department of Development Chief Legal Counsel & Ethics Officer, authorized signatory for Mark Barbash,  
Interim Director  
Title