

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	Gwinnett County, Georgia
Name of Entity or Department Administering Funds	Department of Financial Services
HPRP Contact Person (person to answer questions about this amendment and HPRP)	Craig Goebel
Title	Director
Address Line 1	Community Development Program
Address Line 2	575 Old Norcross Road, Suite A
City, State, Zip Code	Lawrenceville, GA 30045-4367
Telephone	770-822-5190
Fax	770-822-5193
Email Address	craig.goebel@gwinnettcountry.com
Authorized Official (if different from Contact Person)	Aaron J. Bovos
Title	Director
Address Line 1	Department of Financial Services
Address Line 2	75 Langley Drive
City, State, Zip Code	Lawrenceville, GA 30045-6900
Telephone	770-822-7820
Fax	770-822-7818
Email Address	aaron.bovos@gwinnettcountry.com
Web Address where this Form is Posted	www.gwinnettcountry.com

Amount Grantee is Eligible to Receive*	\$1,713,730.00
Amount Grantee is Requesting	\$1,713,730.00

*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:

Advertised for public comment: April 30, 2009 – May 12, 2009, including a public hearing on May 6, 2009, per HPRP Notice requirements [See Attachment 1].

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:

Comments received are contained in Attachment 1 to this Substantial Amendment .

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: _____)

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

Response:

Gwinnett County used an HPRP Needs Assessment Forum/Process to solicit input from organizations which serve homeless individuals and families. Data received from these organizations was used to establish the program priorities contained in this document [the Substantial Amendment to Action Plan 2008 for HPRP funds]. A subsequent competition for funds will be carried out by Gwinnett County during May and June 2009 to select organizations to receive HPRP funds from Gwinnett County. This selection process will permit Gwinnett County to receive applications/award the HPRP funds to applicant organizations, and to obligate the HPRP funds to the awardees prior September 30, 2009.

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:

Gwinnett County will announce the availability of applications for HPRP funds on May 19, 2009 and will hold an application workshop on May 29, 2009. Applications for HPRP funds will be due to the County on June 19, 2009. Awards will be made to recipient agencies in August 2009, and all Subrecipient Agreements will be executed before September 30, 2009. [See Attached HPRP Timetable, Page 10]. Prior to issuance of a Notice to Proceed to agencies selected to receive HPRP funds, Gwinnett County will hold a Recipients' Workshop to distribute the Subrecipient Agreements and Operating Procedures to be used for the Gwinnett County HPRP. Additional technical assistance will also be provided to the recipient organizations to ensure that financial, compliance and performance requirements are understood and to assist the agencies achieve successful program implementation.

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:

Gwinnett County will make its grant awards for twelve-month periods, renewable annually, thereafter, for Subrecipients which have received awards of HPRP funds achieving performance thresholds contained in their Subrecipient Agreements. Moreover, (1) each Subrecipient will receive a site visit prior to issuance of a Notice to Proceed, to ensure that HPRP/ARRA compliance and reporting

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requirements are understood by each Subrecipient; and (2) continuous desk monitoring will be performed on a monthly and quarterly basis to ascertain if Subrecipients are performing according to the terms of their HPRP agreements with Gwinnett County. Monthly performance and financial reports will be required from all Subrecipients, and the County's Program Management firm for HUD grant programs will perform on-site monitoring annually and more frequently, if determined necessary to ensure that appropriate progress is being made with HPRP funds, and to assess the progress by each organization toward meeting Gwinnett County's HPRP performance standards.

To ensure that Gwinnett County has the capacity to carry out its grants management responsibilities under HPRP, the Gwinnett County Community Development Program [staffed by W. Frank Newton, Inc., Gwinnett County's Program Management Firm for HUD programs] will assign one qualified full-time Program Manager to the HPRP. The HPRP Program Manager will oversee the implementation of Gwinnett County's HPRP [technical assistance, training, financial management, compliance and performance evaluation and monitoring, data collection and evaluation, and program reporting. The HPRP Program Manager will be supervised by the Director of the Gwinnett County Community Development Program, who is responsible for the coordination of HPRP, through the Gwinnett County Grants Manager in the Department of Financial Services, with other ARRA-funded programs in Gwinnett County and their requirements.

The Gwinnett County Community Development Program will be responsible for monthly data collection from agencies receiving HPRP funds from Gwinnett County and for the reporting of financial and performance data to HUD on a quarterly and annual basis. Gwinnett County will ensure that agencies receiving its HPRP funds use the Homeless Management Information System [HMIS] used in the State of Georgia [Pathways].

Gwinnett County will also receive quarterly or other periodic HPRP reports, which will be compiled as a part of its overall analysis of ARRA program performance.

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:

Gwinnett County used a collaborative process to develop its HPRP Substantial Amendment submitted to HUD, as follows: (1) Distributed HPRP needs assessment surveys to providers of services to the homeless and hosted an HPRP Needs

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Assessment Forum on 4/17/2009 [attended by local/metropolitan service providers and by the Georgia Department of Community Affairs]; (2) Used data collected through the Needs Assessment Survey to assist in developing the Action Plan 2008 Substantial Amendment for HPRP; (3) Coordinated with the Georgia Department of Community Affairs during the Needs Assessment Process, including participating in a consultation meeting at Georgia DCA on April 23, 2009; (4) Coordinated with the Gwinnett County Coalition for Health and Human Services during the Needs Assessment/Substantial Amendment development processes, including a consultation meeting held on April 28, 2009; (5) Will continue coordination, locally, through the formal communication processes and committees of the Gwinnett County Coalition for Health and Human Services and throughout Gwinnett County government, through the office of the Grants Manager; and (6) will work in cooperation with the Georgia Department of Community Affairs, which is coordinating HPRP activities with State agencies which administer funds in Gwinnett County from the U.S. Departments of Education, Health and Human Services, Homeland Security, and Labor.

Service providers which receive HPRP funds from Gwinnett County will receive information from Gwinnett County which lists programs receiving ARRA funds from these Federal agencies and providing contact persons/telephone numbers/email addresses. Subrecipient Agreements issued to agencies receiving HPRP funds from Gwinnett County will include requirements for coordination of services with other ARRA-funded programs, as described, herein Gwinnett County will monitor its HPRP recipient agencies to ensure that this process is carried out and documented.

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 noted under Item 1, immediately above, Gwinnett County has coordinated its planning process with the Georgia Department of Community Affairs [DCA], in whose Balance of State Continuum of Care Gwinnett agencies participate. The coordination will continue with DCA to ensure that all the local and other appropriate service providers for the homeless in Gwinnett County are aware of the HPRP-funded activities and to ensure that a coordinated delivery of mainstream resources occurs. Gwinnett County will monitor its HPRP recipient agencies to ensure that this process is carried out and documented.

Locally, the Gwinnett County Coalition for Health and Human Services serves as the entity which coordinates the performance of the homeless point-in-time homeless census [gaps analysis] and which has been the convener of planning efforts to serve the homeless and to serve persons at risk of becoming homeless.

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Gwinnett County will provide briefings and reports on HPRP performance to the Coalition to further promote coordination and the sharing of HPRP information.

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: Gwinnett County has incorporated its Continuum of Care model into its Consolidated Plan to serve persons who are homeless and persons who are in danger of becoming homeless. Under the Continuum of Care process contained in the Gwinnett County Consolidated Plan, the County provides funding to homeless service providers from its Entitlement Emergency Shelter Grant [ESG] funds to house homeless persons for brief periods of time, using motel vouchers.

One of the continuing challenges facing Gwinnett County, as identified in its Consolidated Plan, is the inadequate level of funding available to help serve the growing number of homeless or near-homeless persons. The HPRP will permit Gwinnett County to respond to the needs of families made homeless by the economic crisis of 2009 and to help additional families who are at-risk of becoming homeless. As the growing needs of the homeless and persons at-risk of becoming homeless are not being addressed through conventional funding from federal, state and local sources, the use of HPRP funds by Gwinnett County is not only consistent with the investment strategies in the Consolidated Plan, but also provides desperately needed resources to address the families who are suffering during these difficult economic times and to assist the agencies serving these families with case management funding.

Using HPRP, Gwinnett County will be addressing the needs, goal, and priority objectives for serving the homeless, which were identified in its Consolidated Plan 2006-2010, page 78:

Goal: Increase Housing Options for Homeless and Near-Homeless Individuals and Families

Priority Objectives:

- HML1 Support non-profit, private and public entities that provide housing opportunities for at-risk populations.
- HML2 Address the emergency shelter needs of homeless persons, including individuals, families, adults, and youth
- HML3 Provide outreach to homeless persons for assessment of their individual needs

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- HML4 Address the transitional housing needs of homeless persons, including individuals, families, adults and youth
- HML5 Help homeless persons make the transition to permanent housing and independent living
- HML6 Help prevent homelessness of low-income individuals and families

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	\$100,000	\$720,000	\$820,000
Housing Relocation and Stabilization Services ²	\$100,000	\$630,000	\$730,000
Subtotal (add previous two rows)	\$200,000	\$1,345,000	\$1,550,000
Data Collection and Evaluation ³			\$78,044
Administration (up to 5% of allocation)			\$85,686
Total HPRP Amount Budgeted⁴			\$1,713,730

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	[Aaron J. Bovos]	Date
<hr/>		
Director, Gwinnett County Department of Financial Services		
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Title		

**GWINNETT COUNTY, GEORGIA TIMETABLE
HOMELESS PREVENTION AND RAPID RE-HOUSING PROGRAM [HPRP]**

March 19, 2009	HUD Published HPRP Notice [HPRP Regulations]
March 30, 2009	Gwinnett County Invitation to Needs Assessment Forum Distributed
April 17, 2009 – 10:00 A.M.	Gwinnett County Needs Assessment Forum
April 24, 2009 - 5:00 P.M.	HPRP Needs Assessment Comments/Survey Due to: Gwinnett County Community Development Program 575 Old Norcross Road, Suite A Lawrenceville, Georgia 30045-4367 Telephone: 770-822-5190 FAX: 770-822-5193 Email: gchcd@gwinnettcountry.com
April 30, 2009	Gwinnett County Publishes Its Proposed Uses of HPRP Funds [Substantial Amendment to <u>Action Plan 2008</u>]
May 6, 2009 – 10:00 A.M.	<u>Public Hearing - Proposed Use of HPRP Funds [Substantial Amendment to Action Plan 2008.</u> Gwinnett Justice and Administration Center Conference Center, Room C 75 Langley Drive Lawrenceville, GA 30045
May 12, 2009	Comments Due on Gwinnett County Proposed Uses of HPRP Funds [Substantial Amendment to <u>Action Plan 2008</u>] – Send Comments to: Gwinnett County Community Development Program 575 Old Norcross Road, Suite A Lawrenceville, Georgia 30045-4367 Telephone: 770-822-5190 FAX: 770-822-5193 Email: gchcd@gwinnettcountry.com
May 15, 2009	Gwinnett County Submits to HUD its Proposed Uses of HPRP Funds [Substantial Amendment to <u>Action Plan 2008</u>]
May 19, 2009	Gwinnett County Publishes Notice of Availability/Distributes Applications for HPRP Funds
May 29, 2009 10 A.M.	<u>HPRP Application Workshop</u> Gwinnett Justice and Administration Center Conference Center, Room C 75 Langley Drive Lawrenceville, GA 30045-6900
June 19, 2009 – 5:00 P.M.	<u>HPRP Applications Due to:</u> Gwinnett County Community Development Program 575 Old Norcross Road, Suite A Lawrenceville, Georgia 30045-4367
July or August 2009	Gwinnett County Board of Commissioners Award HPRP Funds
September 30, 2009	HPRP Funds Obligated [Executed Subrecipient Agreements]

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GENERAL CERTIFICATIONS FOR STATE OR LOCAL GOVERNMENT FOR THE HOMELESSNESS PREVENTION AND RAPID RE-HOUSING PROGRAM (HPRP)

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the state, territory, or local government certifies that:

Affirmatively Further Fair Housing -- The state, territory, or local government will affirmatively further fair housing, which means it will conduct an analysis of impediments to fair housing choice within the jurisdiction or state, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting that analysis and actions in this regard.

Drug-Free Workplace --It will or will continue to provide a drug-free workplace by:

1. Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the grantee's workplace and specifying the actions that will be taken against employees for violation of such prohibition;
2. Establishing an ongoing drug-free awareness program to inform employees about:
 - (a) The dangers of drug abuse in the workplace;
 - (b) The grantee's policy of maintaining a drug-free workplace;
 - (c) Any available drug counseling, rehabilitation, and employee assistance programs; and
 - (d) The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace;
3. Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph 1;
4. Notifying the employee in the statement required by paragraph 1 that, as a condition of employment under the grant, the employee will –
 - (a) Abide by the terms of the statement; and
 - (b) Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;
5. Notifying the agency in writing, within ten calendar days after receiving notice under subparagraph 4(b) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the Federal agency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;
6. Taking one of the following actions, within 30 calendar days of receiving notice under subparagraph 4(b), with respect to any employee who is so convicted –
 - (a) Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended;

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or

- (b) Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, state, or local health, law enforcement, or other appropriate agency;

7. Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs 1, 2, 3, 4, 5 and 6.

Anti-Lobbying --To the best of the state, territory, or local government’s knowledge and belief:

- 1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
- 2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
- 3. It will require that the language of paragraphs 1 and 2 of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

Authority of Local Government, State, or Territory --The submission of the consolidated plan is authorized under state law and local law (as applicable) and the jurisdiction or state possesses the legal authority to carry out the programs under the consolidated plan for which it is seeking funding, in accordance with applicable HUD regulations.

Consistency with Plan -- The housing activities to be undertaken with HPRP funds are consistent with the strategic plan.

Section 3 --It will comply with section 3 of the Housing and Urban Development Act of 1968, and implementing regulations at 24 CFR Part 135.

Signature/Authorized Official [Aaron J. Bovos] Date

Director, Gwinnett County Department of Financial Services

Title

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**APPENDIX TO CERTIFICATIONS
INSTRUCTIONS CONCERNING LOBBYING AND DRUG-FREE WORKPLACE
REQUIREMENTS:**

A. Lobbying Certification

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

B. Drug-Free Workplace Certification

1. By signing and/or submitting this application or grant agreement, the grantee is providing the certification.
2. The certification is a material representation of fact upon which reliance is placed when the agency awards the grant. If it is later determined that the grantee knowingly rendered a false certification, or otherwise violates the requirements of the Drug-Free Workplace Act, HUD, in addition to any other remedies available to the Federal Government, may take action authorized under the Drug-Free Workplace Act.
3. Workplaces under grants, for grantees other than individuals, need not be identified on the certification. If known, they may be identified in the grant application. If the grantee does not identify the workplaces at the time of application, or upon award, if there is no application, the grantee must keep the identity of the workplace(s) on file in its office and make the information available for Federal inspection. Failure to identify all known workplaces constitutes a violation of the grantee's drug-free workplace requirements
3. Workplace identifications must include the actual address of buildings (or parts of buildings) or other sites where work under the grant takes place. Categorical descriptions may be used (e.g., all vehicles of a mass transit authority or State highway department while in operation, State employees in each local unemployment office, performers in concert halls or radio stations).
5. If the workplace identified to the agency changes during the performance of the grant, the grantee shall inform the agency of the change(s), if it previously identified the workplaces in question (see paragraph three).
6. The Grantee may insert in the space provided below the site(s) for the performance of work done in connection with the specific grant:

Place of Performance (Street address, city, county, state, zip code)

Gwinnett County Community Development Program [W. Frank Newton, Inc., Program Mgt. Firm]
575 Old Norcross Road, Suite A
Lawrenceville, Georgia 30045-4367 and

Gwinnett County Department of Financial Services
75 Langley Drive
Lawrenceville, Georgia 30045-6900

Check ___ if there are workplaces on file that are not identified here.

The certification with regard to the drug-free workplace is required by 24 CFR part 24, subpart F.

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7. Definitions of terms in the Nonprocurement Suspension and Debarment common rule and Drug-Free Workplace common rule apply to this certification. Grantees' attention is called, in particular, to the following definitions from these rules: "Controlled substance" means a controlled substance in Schedules I through V of the Controlled Substances Act (21 U.S.C. 812) and as further defined by regulation (21 CFR 1308.11 through 1308.15);

"Conviction" means a finding of guilt (including a plea of nolo contendere) or imposition of sentence, or both, by any judicial body charged with the responsibility to determine violations of the Federal or State criminal drug statutes;

"Criminal drug statute" means a Federal or non-Federal criminal statute involving the manufacture, distribution, dispensing, use, or possession of any controlled substance;

"Employee" means the employee of a grantee directly engaged in the performance of work under a grant, including: (i) All "direct charge" employees; (ii) all "indirect charge" employees unless their impact or involvement is insignificant to the performance of the grant; and (iii) temporary personnel and consultants who are directly engaged in the performance of work under the grant and who are on the grantee's payroll. This definition does not include workers not on the payroll of the grantee (e.g., volunteers, even if used to meet a matching requirement; consultants or independent contractors not on the grantee's payroll; or employees of subrecipients or subcontractors in covered workplaces).

Homelessness Prevention and Rapid Re-Housing Program (HPRP) Certifications

The HPRP Grantee certifies that:

Consolidated Plan – It is following a current HUD-approved Consolidated Plan or CHAS.

Consistency with Plan – The housing activities to be undertaken with HPRP funds are consistent with the strategic plan.

Confidentiality – It will develop and implement procedures to ensure:

- (1) the confidentiality of records pertaining to any individual provided with assistance; and
- (2) that the address or location of any assisted housing will not be made public, except to the extent that this prohibition contradicts a preexisting privacy policy of the grantee.

Discharge Policy – A certification that the State or jurisdiction has established a policy for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent such discharge from immediately resulting in homelessness for such persons.

HMIS – It will comply with HUD’s standards for participation in a local Homeless Management Information System and the collection and reporting of client-level information.

<hr/>		<hr/>
Signature/Authorized Official	[Aaron J. Bovos]	Date
<hr/>		
Director, Gwinnett County Department of Financial Services		
Title		

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

Attachment 1

Public Comments

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

PUBLIC NOTICE
GWINNETT COUNTY COMMUNITY DEVELOPMENT PROGRAM
PROPOSED SUBSTANTIAL AMENDMENT
ACTION PLAN 2008
PUBLICATION DATE: APRIL 30, 2009
PUBLISH IN: GWINNETT DAILY POST

Public comments are invited on a proposed substantial amendment to Gwinnett County Action Plan 2008.

A Public Hearing will be held to receive comments on the proposed amendment **May 6, 2009 at 10:00 A.M., Gwinnett Justice and Administration Center, Conference Center Room C, 75 Langley Drive, Lawrenceville, Georgia 30045-6900.**

Written comments on the proposed amendment should be mailed to: Gwinnett County Community Development Program, 575 Old Norcross Road, Suite A, Lawrenceville, GA 30045-4367, sent by FAX [770-822-5193] or sent by email to: gchcd@gwinnettcountry.com. All written comments **MUST BE RECEIVED** by the Gwinnett County Community Development Program by **5:00 P.M. local time, May 12, 2009**.

Comments received will be included in the Action Plan 2008 HPRP substantial amendment submitted to HUD.

Contact the Gwinnett County Community Development Program with questions or comments: Telephone: 770-822-5190; FAX 770-822-5193; email: gchcd@gwinnettcountry.com.

PROPOSED SUBSTANTIAL AMENDMENT – ACTION PLAN 2008

Proposed Uses – Economic Stimulus Funds [Homelessness Prevention and Rapid Re-Housing Program [HPRP]]

Gwinnett County will receive HPRP funds [\$1,713,730] from the U.S. Department of Housing and Urban Development [HUD]. The HPRP was created under Title XI of the American Recovery and Reinvestment Act of 2009.

The purpose of HPRP is to provide homelessness prevention assistance to households who would otherwise become homeless – many due to the economic crisis – and to provide assistance to rapidly re-house persons who are homeless. The regulations issued by HUD do not permit HPRP funds to be used to make mortgage payments.

In this notice, Gwinnett County publishes its proposed eligible uses of HPRP funds. A competition for the HPRP funds will be conducted by Gwinnett County from May 19, 2009 – June 19, 2009, resulting in Gwinnett County awarding HPRP funds to one or more organizations that have experience serving persons who are homeless, or who are at risk of becoming homeless.

Gwinnett County Proposed Uses of HPRP Funds			
	Homelessness Prevention	Rapid Re-Housing	Total Amount Budgeted
Financial Assistance [See Note 1]	\$100,000	\$720,000	\$820,000
Housing Relocation and Stabilization Services [See Note 2]	\$100,000	\$630,000	\$730,000
Subtotal	\$200,000	\$1,350,000	\$1,550,000
Data Collection and Evaluation [See Note 3]			\$78,044
Administration (5% of \$1,713,730)			\$85,686
Subtotal			\$163,730
Total Proposed Uses of HPRP Funds			\$1,713,730

Note 1: Financial assistance may include the following HPRP eligible activities: short-term rental assistance, medium-term rental assistance, security deposits, utility deposits, utility payments, moving cost assistance, and motel or hotel vouchers.

Note 2: Housing relocation and stabilization services may include the following HPRP eligible activities: case management, outreach, housing search and placement, legal services, mediation, and credit repair.

Note 3: Data collection and evaluation may include 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.

AMERICANS WITH DISABILITIES ACT OF 1990 [ADA], AS AMENDED AND SECTION 504 ACCOMMODATIONS STATEMENT
 Gwinnett County does not discriminate on the basis of disability in the admission or access to, or treatment or employment in, its programs or activities. Any requests for reasonable accommodations required by individuals to fully participate in any open meeting, program or activity of the Gwinnett County Community Development Program should be directed to Director, Gwinnett County Community Development Program, 575 Old Norcross Road, Suite A, Lawrenceville, GA 30045-4367. Telephone number 770-822-5190; FAX 770-822-5193; email: gchcd@gwinnettcountry.com.

GCD Voucher: CD601406

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

Public Comments:

Gwinnett County held a HPRP Needs Assessment Public Forum on April 17, 2009 where organizations serving the homeless population were invited to attend and provide input to the County on which is the HPRP eligible activities needed to receive priority attention in the funding categories for inclusion in the Substantial Amendment for Action Plan 2008 – HPRP Funds.

A survey was distributed to the attendees which, when analyzed indicated that short-term and medium term housing, homelessness prevention, and case management were the highest priority needs.

The Substantial Amendment for Action Plan 2008 – HPRP Funds – was advertised April 30, 2009 in Gwinnett County Legal Organ: Gwinnett Daily Post and was also posted on the Gwinnett County Website for a comment period ending May 12, 2009 @ 5:00 P.M. The Public Notice was also posted on the Gwinnett County Website:

The following is the link to the Gwinnett County Website for the advertisement: www.gwinnettcountry.com

On the Website, select “Stimulus Funding” from “Popular Links.”

During the public comment period, a Public Hearing was held on May 6, 2009, which was attended by:

Janet Tharpe and Debbie Wengrow, The Salvation Army
Tanikia Jackson, Gwinnett County Grants Manager
Percy Scott, Gwinnett County Human Relations Commission
Craig Goebel and Tony Lowe, Gwinnett County Community Development Program

No specific comments were received at the Public Hearing regarding the proposed uses of HPRP funds, as advertised on April 30, 2009.

Comments were received from Debbie Wengrow of the Salvation Army on May 11, 2009 and are accepted by Gwinnett County.

[A scanned copy Ms. Wengrow’s comments follow.]

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

May. 11. 2009 4:02PM

No. 5117 P. 1

Shaw Clifton
General

Max Feener
Territorial Commander



Major William Mockabee
Divisional Commander

Captains Bobby & Anne Westmoreland
Corps Officers

The Salvation Army

3455 Sugarloaf Pkwy., P.O. Box 1813
Lawrenceville, GA 30045
Telephone: (770) 963-8802 Fax: (770) 963-4371

Fax Transmittal

TO: Gwinnett County Community Development Program
DATE: 5-12-09
PAGES: 2
FAX#: 770.822.5193
FROM: D. Wengron
RE: Citizen Review Comment

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

May. 11. 2009 4:02PM

No. 5117 P. 2

CITIZEN REVIEW COMMENT FORM
 GWINNETT COUNTY, GEORGIA
PROPOSED AMENDED GWINNETT COUNTY ACTION PLAN 2008
 PUBLIC COMMENT PERIOD: 4/30/2009 - 5/12/2009
 INCLUDING PUBLIC HEARING

Public Hearing Location	Address	Date	Time
Gwinnett Justice and Administration Center 2 nd Floor, Conference Center, Room C	76 Langley Drive, Lawrenceville, GA	May 8, 2009	10:00 AM

Gwinnett County invites public comments on the proposed Substantial Amendment to Gwinnett County Proposed Action Plan 2008 (proposing uses of the Homelessness Prevention and Rapid Re-Housing Program – HPRP) which will be submitted to the U.S. Department of Housing and Urban Development not later than May 18, 2009.

Submit Written Comments by May 12, 2009: 5:00 P.M. to:
 Gwinnett County Community Development Program
 575 Old Norcross Road, Suite A
 Lawrenceville, Georgia 30045-4367
 Telephone 770-822-5190; FAX 770-822-5193; email: gchcd@gwinnettcountry.com

Your review of the documents is encouraged and your comments are invited. Please use this form for any comments you may have.

Copy this page and attach as many pages as required for your comments.

Comments:

Page 1 of 2.

See attached comments

Thank you for your comments.

Please Provide Your Name/Organization/Address/Telephone Number/FAX/Email: [Optional, but appreciated]

Name: Debbie Wengrow
 Organization Represented, if Any: The Salvation Army, Lawrenceville
 Mailing Address: 3455 Sugarloaf Parkway
 City: Lawrenceville State GA Zip 30044
 Telephone (770) 963-8802 FAX (770) 963-4371
 Email: Deborah_Wengrow@uss.salvationarmy.org

N:\WP\Economic Stimulus 2009\HPRP\PUBLIC HEARINGS\PUBLIC COMMENT FORM - PROPOSED AMENDED ACTION PLAN 2008.DOC

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

May. 11. 2009 4:02PM

No. 5117 P. 3

In an effort to address the needs of the Gwinnett community and respond to the requests of our partnering emergency assistance providers and the faith-based community, The Salvation Army in collaboration with the Gwinnett County Continuum of Care for homelessness services has begun providing a rapid re-housing program for families who are newly homeless or at imminent risk of homelessness. All homeless applicants are provided on an emergency basis immediate safe housing, food and other types of basic quality care and are also provided with an immediate assessment by a licensed social worker to determine the applicant's level of service need and appropriateness for participation in our Home Sweet Home rapid re-housing program. Those whose assessments disclose that they can benefit from intensive case management services to help them rapidly return to economic independence and housing stability are provided with an apartment in one of our sites scattered about the county and are provided with a trained case manager who helps the family to quickly ameliorate their particular barriers to housing stability. Those whose assessments indicate a need for longer-term housing solutions are assisted with case management services and applications to help them enter the longer-term housing programs available in the community.

Upon regaining economic self-sufficiency, the families in our Home Sweet Home rapid re-housing program are able to assume the lease for their apartment eliminating the need for any additional disruptive moves. This apartment rapid re-housing model has been well accepted by the community which has previously struggled to meet the needs of those individuals who needed traditional box style homeless shelters. The model has also eliminated the stigma of homelessness for families with children who blend seamlessly into their new apartment communities and has further reduced the emotional trauma of homelessness by providing immediate, comprehensive and supportive services through our Salvation Army corps and our community partners. This emergency, rapid re-housing program has shown effectiveness at moving individuals to housing stability who have not been successful in other community emergency housing programs.

Emergency service providers often utilize hotel voucher programs as a method of providing emergency housing services. These programs are well meaning but sometimes lack qualified staff trained to provide the type of assessments and ongoing case management services that can move families back to self-sufficiency. The vouchers are dispensed at a variety of widely dispersed locations for limited amounts of time (a few days to a few weeks) at each location.

The current economic downturn means the homeless population are frequently unable to find new jobs before the limited hotel stay ends forcing them to spend their days trolling for more hotel vouchers. This endless voucher search with such uncertain outcomes negatively impacts their ability to job search, to re-train or to take part in other healthier activities that might overcome their homelessness. In addition, the homeless people coming to our offices after exhausting much of the voucher assistance available to them in the county are also exhibiting symptoms of severe anxiety and depression further hindering their efforts to present well at job interviews and regain self-sufficiency. Outcome measures designed to track program success indicate that the addition of trained case managers along with the right supportive services dramatically improves the rate of return for our families to housing stability.