

Proposed
**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	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 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>

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:

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

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 will be included in the Substantial Amendment delivered to HUD.

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: _____)

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

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 28, 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

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

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

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

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.

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

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

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

- 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.”

**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 28, 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]

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

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;

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

**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.

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

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.

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