Homelessness Prevention and Rapid Re-Housing Program (HPRP)

Substantial Amendment to the 2008–2012 Consolidated Plan including the 2008 Annual Action Plan

Burrell Ellis, Chief Executive Officer

Board of Commissioners
Elaine Boyer, District 1
Jeff Rader, District 2
Larry Johnson, District 3
Sharon Barnes Sutton, District 4
Lee May, District 5
Kathie Gannon, District 6
Connie Stokes, District 7

DeKalb County DUNS Number: 061420535
Prepared by:
Community Development Department
Chris H. Morris, Director
DeKalb County, Georgia
(404) 286-3308 / (404) 286-3337
May 15, 2009
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)
A. General Information

<table>
<thead>
<tr>
<th>Grantee Name</th>
<th>DeKalb County</th>
</tr>
</thead>
<tbody>
<tr>
<td>Name of Entity or Department Administering Funds</td>
<td>DeKalb County Community Development</td>
</tr>
<tr>
<td>HPRP Contact Person</td>
<td>Chris H. Morris</td>
</tr>
<tr>
<td>(person to answer questions about this amendment and HPRP)</td>
<td></td>
</tr>
<tr>
<td>Title</td>
<td>Director</td>
</tr>
<tr>
<td>Address Line 1</td>
<td>1807 Candler Road</td>
</tr>
<tr>
<td>Address Line 2</td>
<td></td>
</tr>
<tr>
<td>City, State, Zip Code</td>
<td>Decatur, GA 30032</td>
</tr>
<tr>
<td>Telephone</td>
<td>404-286-3308</td>
</tr>
<tr>
<td>Fax</td>
<td>404-286-3337</td>
</tr>
<tr>
<td>Email Address</td>
<td><a href="mailto:chmorris@co.dekalb.ga.us">chmorris@co.dekalb.ga.us</a></td>
</tr>
<tr>
<td>Authorized Official</td>
<td>Burrell Ellis</td>
</tr>
<tr>
<td>(if different from Contact Person)</td>
<td></td>
</tr>
<tr>
<td>Title</td>
<td>CEO</td>
</tr>
<tr>
<td>Address Line 1</td>
<td>330 East Ponce De Leon Avenue</td>
</tr>
<tr>
<td>Address Line 2</td>
<td></td>
</tr>
<tr>
<td>City, State, Zip Code</td>
<td>Decatur, GA 30030</td>
</tr>
<tr>
<td>Telephone</td>
<td>404-371-2881</td>
</tr>
<tr>
<td>Fax</td>
<td>404-371-6291</td>
</tr>
<tr>
<td>Email Address</td>
<td><a href="mailto:ceoburrellellis@co.dekalb.ga.us">ceoburrellellis@co.dekalb.ga.us</a></td>
</tr>
<tr>
<td>Web Address where this Form is Posted</td>
<td><a href="http://www.co.dekalb.ga.us">www.co.dekalb.ga.us</a></td>
</tr>
</tbody>
</table>

| Amount Grantee is Eligible to Receive* | $2,359,998 |
| Amount Grantee is Requesting           | $2,359,998 |

*Amounts are available at [http://www.hud.gov/recovery/homelesspreventrecov.xls](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:
In summary, the County’s Citizen Participation Plan requires the following relevant activities:

1. Encourage citizen participation by all citizens
2. Provide citizens and units of general local government with reasonable and timely access to related local meetings, information, and records.
3. Provide technical assistance to groups representing persons with very low and low incomes that request assistance in developing proposals.
4. Consider all written or verbal comments or views of citizens or units of local government that are received during the public comment period.

The chart below lists the County’s HPRP related Citizen Participation activities and demonstrates that the County adhered to its Citizen Participation Plan:

<table>
<thead>
<tr>
<th>DATE</th>
<th>ACTIVITY</th>
</tr>
</thead>
<tbody>
<tr>
<td>April 16</td>
<td>Discussed Substantial Amendment and application process at the Technical Workshop for CDBG/ESGP.</td>
</tr>
<tr>
<td>April 21</td>
<td>Information shared with CEO and Board of Commissioners</td>
</tr>
<tr>
<td>April 22</td>
<td>Sent notices of Substantial Amendment and comment period to Community Development Advisory Council (CDAC) members, Homeless Advisory Council (HAC) members, agencies, and County Departments.</td>
</tr>
<tr>
<td>April 23</td>
<td>Discussed Substantial Amendment at the DeKalb Collaborative Forum and CDBG Public Hearing</td>
</tr>
<tr>
<td>April 23</td>
<td>Advertisements appeared in The Champion, On Common Ground, and Crossroads newspapers, informing citizens of the upcoming Substantial Amendment process and methods of participating</td>
</tr>
<tr>
<td>May 5</td>
<td>Public Comment Period ended. No comments received.</td>
</tr>
</tbody>
</table>
Substantial Amendment to the Consolidated Plan 2008 Action Plan for the Homelessness Prevention and Rapid Re-Housing Program (HPRP)

<table>
<thead>
<tr>
<th>DATE</th>
<th>ACTIVITY</th>
</tr>
</thead>
<tbody>
<tr>
<td>May 6</td>
<td>Advertised HPRP application process</td>
</tr>
<tr>
<td>May 12</td>
<td>BOC meeting</td>
</tr>
<tr>
<td>May 13</td>
<td>Conducted Technical Assistance Workshop for applicants.</td>
</tr>
</tbody>
</table>

2. Provide the appropriate response regarding this substantial amendment by checking one of the following options:

- [x] 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: No comments were submitted to the County.

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
- [x] Other (Specify: Agency Application Process)
2. Briefly describe the process(es) indicated in question 1 above (limit 250 words).

Response:
To select HPRP subgrantees, DeKalb County plans to follow the procedure shown below:

<table>
<thead>
<tr>
<th>Activity</th>
<th>Anticipated Date(s)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Advertise the DeKalb County HPRP agency application acceptance period and technical assistance workshop in local newspapers</td>
<td>5/6</td>
</tr>
<tr>
<td>Place applications and general information on the County website</td>
<td>5/12</td>
</tr>
<tr>
<td>Distribute additional applications at the Technical Assistance Workshop</td>
<td>5/13</td>
</tr>
<tr>
<td>Conduct Technical Assistance Workshop for potential applicants. During the workshop explain HPRP requirements, HPRP, CoC and other collaborations, the DeKalb implementation of HPRP, application categories, agency requirements, and the scoring process</td>
<td>5/13</td>
</tr>
<tr>
<td>Receive agency questions regarding the agency application via email</td>
<td>5/13 – 5/25</td>
</tr>
<tr>
<td>Receive and date stamp all agency applications received by the agency application deadline</td>
<td>6/1</td>
</tr>
<tr>
<td>Review applications to ensure threshold requirements are satisfied</td>
<td>6/2-6/19</td>
</tr>
<tr>
<td>Distribute applications satisfying threshold requirements to applications review team for scoring based on applicant capacity, request feasibility, project costs and other predetermined criteria</td>
<td>6/2-6/19</td>
</tr>
<tr>
<td>Notify agencies not satisfying threshold requirements that applications could not be accepted</td>
<td>6/2-6/19</td>
</tr>
<tr>
<td>Application review team scores applications, recommends funding amounts</td>
<td>6/2-6/19</td>
</tr>
<tr>
<td>DeKalb County senior staff examines and approves recommendations</td>
<td>6/2-6/19</td>
</tr>
</tbody>
</table>
Substantial Amendment to the Consolidated Plan 2008 Action Plan for the Homelessness Prevention and Rapid Re-Housing Program (HPRP)

<table>
<thead>
<tr>
<th>Activity</th>
<th>Anticipated Date(s)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Contract Preparation/Approval Process via Purchasing &amp; Contracts</td>
<td>6/20 – 9/1</td>
</tr>
<tr>
<td>BOC Agenda for funding recommendations</td>
<td>7/14</td>
</tr>
<tr>
<td>HUD Deadline to Commit funds</td>
<td>9/30</td>
</tr>
</tbody>
</table>

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:
As shown in the chart in Item 2 above, the County plans to identify HPRP funded agencies before the September 1, 2009 Grant Agreement date. With this early identification process, subgrantee agreements will be signed before September 30, 2009.

The County plans to allocate funds to agencies based on the following criteria:
- HPRP component being provided
- agency capacity
- number of participants served
- cost relative to service provided
- need for the proposed eligible service
- magnitude of the collaboration with other HPRP and non-HPRP providers

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:
DeKalb County plans to take the following steps to ensure the effective and timely use of HPRP funds by subgrantees:
- Distribute grants only to subgrantees demonstrating the capacity to effectively administer the grant funds.
- Provide funding through collaborative arrangements to lead agencies
- Assign subgrantee liaison responsibilities to DeKalb County staff representatives. The liaison will ensure that agencies adhere to HPRP
Substantial Amendment to the Consolidated Plan 2008 Action Plan for the Homelessness Prevention and Rapid Re-Housing Program (HPRP)

regulations, submit timely and accurate reports, and utilize funds as prescribed by County agreements and HPRP regulations.

- Monitor sub-grantee activity every 6 months and otherwise in accordance the DeKalb County Consolidated Plan
- Provide HMIS technical assistance to ensure that data is accurately entered within the HMIS system.

To oversee the administration of HPRP funds, DeKalb County will employ an HPRP Coordinator. This coordinator will report to the Housing Manager in the County’s Community Development Department and be responsible for analyzing overall program effectiveness, monitoring programmatic expenditures, ensuring program compliance with HPRP regulations and DeKalb County requirements, and facilitating agency collaboration.

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:
Through its collaborative forums, strategy development groups and service provision/funding efforts, DeKalb County currently collaborates with the Georgia Department of Community Affairs, DeKalb Work Force Development, DeKalb Board of Health, Department of Family and Children’s Services, DeKalb School System, DeKalb Community Service Board, DeKalb Police Department, Georgia Department of Pardons and Parole, and other agencies providing homeless assistance. Through its collaboration with these organizations and agencies, the County summarily works with their state and federal counterparts to achieve stated goals. The County will continue collaborating with these organizations in the HPRP processes to provide services, housing, and ensure long-term stability for households that are homeless or at risk of becoming homeless.

To facilitate the team effort with HPRP funds, agencies have agreed to provide intake, assessment and referral using a centralized access and referral method. With this centralized method, lead agencies will assess program participants and refer them appropriately, depending upon participant need. Agencies that receive funding under the American Recovery and Reinvestment Act will play key roles in ensuring that participants gain the stability needed to remain housed. For example, Work Force Development (an ARRA recipient), DeKalb
Substantial Amendment to the Consolidated Plan 2008 Action Plan for the Homelessness Prevention and Rapid Re-Housing Program (HPRP)

Economic Development, DeKalb Parks and Recreation and DeKalb School System will provide a summer camp and job training program. Program staff will assess the needs of camp participants' families and refer the housing needs cases to the DeKalb Central Point of contact for further assessment and service. It is known that many of the youth in the program's target area are precariously housed.

2. Briefly describe how the grantee plans to collaborate with appropriate Continuum(s) of Care and mainstream resources regarding HPRP activities (limit 250 words).

Response:
The County's collaborative intent is manifested in one of its long-term goals: "Serve the homeless and at-risk populations by collaborating with the Regional Commission on Homelessness, Metropolitan Atlanta Tri-Jurisdictional Collaborative on Homelessness (Tri-J Continuum of Care), and other appropriate entities to identify and implement the housing and supportive services required to mitigate homelessness." The collaboration with the Regional Homeless Commission and Tri-J are especially significant. These collaborations are the result of an acknowledgement that homelessness in one jurisdiction or county affects other jurisdictions in the Metropolitan area.

DeKalb County has adopted the Continuum of Care strategy to address the needs surrounding homelessness within its borders. To ensure the effective use of resources and the provision of comprehensive services, the County partners with mainstream providers, governmental organizations, public and private non-profit agencies, faith based organizations, and for profit businesses. All of these agencies/organizations are represented in County sponsored collaborative forums on homelessness and special solution oriented workgroups.

The County will continue this strategy in its planning and implementation of HPRP. The Department of Labor, DeKalb Work Force Development, DeKalb Board of Health, Department of Family and Children's Services, DeKalb School System, and other agencies providing homeless assistance will collaborate to provide services, housing, and ensure long-term stability for households that are homeless or at risk of becoming homeless. To facilitate the team effort with HPRP funds, agencies have agreed to provide intake, assessment and referral using a centralized access and referral method. Lead agencies will assess program participants and refer them appropriately depending upon participant need. Employment services providers (Department of Labor, Work Force Development and agencies offering
Substantial Amendment to the Consolidated Plan 2008 Action Plan for the Homelessness Prevention and Rapid Re-Housing Program (HPRP)

employment services) will play a key role in ensuring that participants gain employment that can lead to self sufficiency and the retention of housing. Thus, agencies will collaborate to refer program participants appropriately and ensure that participants receive comprehensive services from mainstream providers and agencies.

3. Briefly describe how HPRP grant funds for financial assistance and housing relocation/stabilization services will be used in a manner that is consistent with the grantee’s Consolidated Plan (limit 250 words).

Response:
HPRP funds for financial assistance and housing relocation/stabilization services will be used to provide housing and eligible services to households that require temporary assistance in order to obtain and maintain housing. The DeKalb County 2008-2012 Consolidated Plan directly supports this activity. The Consolidated Plan excerpts shown below demonstrate this consistency with the planned HPRP use of funds:

To assist low income households at imminent risk of homelessness, DeKalb County collaborates with agencies to sponsor programs aimed at providing affordable housing, self-sufficiency training, employment, job training, emergency rental assistance, and other supportive services. Listed below are the planned collaborative efforts:

- The County will implement a collaborative effort among all agencies serving the homeless to ensure that the homeless and “at risk” populations are served comprehensively.
- The County will implement an assessment center approach to facilitate access to providers serving the “at risk” and homeless populations.
- Serve the homeless and at risk populations by collaborating with the Regional Commission on Homelessness, Tri-J, and other appropriate entities to identify and implement the housing and supportive services required to mitigate homelessness.

The HPRP housing and eligible services will be augmented by services from mainstream providers, governmental agencies, and non-profit agencies to ensure long-term program participant stability.
Substantial Amendment to the Consolidated Plan 2008 Action Plan for the Homelessness Prevention and Rapid Re-Housing Program (HPRP)

E. Estimated Budget Summary

HUD requires the grantee to complete the following table so that participants in the citizen participation process may see the grantee’s preliminary estimated amounts for various HPRP activities. Enter the estimated budget amounts for each activity in the appropriate column and row. The grantee will be required to report actual amounts in subsequent reporting.

<table>
<thead>
<tr>
<th>HPRP Estimated Budget Summary</th>
<th>Homlessness Prevention</th>
<th>Rapid Re-housing</th>
<th>Total Amount Budgeted</th>
</tr>
</thead>
<tbody>
<tr>
<td>Financial Assistance(^1)</td>
<td>$ 1,057,699</td>
<td>$ 597,300</td>
<td>$ 1,654,999</td>
</tr>
<tr>
<td>Housing Relocation and Stabilization Services(^2)</td>
<td>$ 297,600</td>
<td>$ 170,400</td>
<td>$ 468,000</td>
</tr>
<tr>
<td><strong>Subtotal</strong> (add previous two rows)</td>
<td>$ 1,355,299</td>
<td>$ 767,700</td>
<td><strong>$ 2,122,999</strong></td>
</tr>
</tbody>
</table>

| Data Collection and Evaluation\(^3\)                | $ 119,000              |
| Administration (up to 5% of allocation)            | $ 117,999              |
| **Total HPRP Amount Budgeted\(^4\)**               | **$ 2,359,998**        |

\(^1\)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.

\(^2\)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.

\(^3\)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.

\(^4\)This amount must match the amount entered in the cell on the table in Section A titled “Amount Grantee is Requesting.”
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]

[Title]

[Date]

Burrell Ellis
Chief Executive Officer
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; 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

Burrell Ellis
Chief Executive Officer

____________________
Date

5/15/04
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.

4. 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)

Locations will be identifies when sug-grantees are identified.

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.

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
Burrell Ellis
Chief Executive Officer

Date
5/15/09