

Commonwealth of Pennsylvania
Department of Community and Economic Development

Consolidated Plan Amendment 2004 – 2008

Action Plan for the Homelessness Prevention and Rapid
Re-housing Program

May 2009
(Revised September 16, 2009)

A. General Information

| | |
|--|---|
| Grantee Name | Commonwealth of Pennsylvania |
| Name of Entity or Department Administering Funds | Department of Community and Economic Development |
| HPRP Contact Person (person to answer questions about this amendment and HPRP) | Ed Geiger |
| Title | Director, DCED Center for Community Development |
| Address Line 1 | Commonwealth Keystone Building |
| Address Line 2 | 400 North Street, 4 th Floor |
| City, State, Zip Code | Harrisburg, PA 17120 |
| Telephone | 717-787-5327 |
| Fax | 717-214-5416 |
| Email Address | egeiger@state.pa.us |
| Authorized Official (if different from Contact Person) | George Cornelius |
| Title | Secretary |
| Address Line 1 | Commonwealth Keystone Building |
| Address Line 2 | 400 North Street |
| City, State, Zip Code | Harrisburg, PA 17120 |
| Telephone | 717-787-3003 |
| Fax | 717-787-6866 |
| Email Address | |
| Web Address where this Form is Posted | http://www.newpa.com/strengthen-your-community/technical-assistance/index.aspx |

| | |
|---|---------------------|
| Amount Grantee is Eligible to Receive* | \$23,411,484 |
| Amount Grantee is Requesting | \$23,411,484 |

*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:

DCED published a notice announcing the availability of this draft Action Plan Amendment (Action Plan) for HPRP in the *PA Bulletin*, which appeared on May 2, 2009. DCED also distributed information about the availability of this draft Action Plan to the following organizations and groups:

- Local Continuums of Care for homelessness housing and services
- State entitlement CDBG grantees
- Federal entitlement CDBG grantees
- County agencies that administer the Department of Public Welfare (DPW) Programs including the Homeless Assistance Program, the Mental Health and Substance Abuse Program, and other human service programs
- Housing Alliance of Pennsylvania
- Community Action Association of Pennsylvania (CAAP)
- PA Association of Housing and Redevelopment Authorities (PAHRA)

DCED staff also presented the draft Action Plan at the following meetings: May 5, 2009 annual meeting of the Housing Alliance of Pennsylvania, a statewide nonprofit advocacy organization, and May 6, 2009 Homelessness Steering Committee meeting, which serves as the working body of the state Interagency Council on Homelessness.

DCED will accepted comments on the draft Action Plan at these meetings and in writing. DCED accepted comments on the draft Action Plan at these meetings and in writing. DCED accepted comments for a period of 12 days.

- 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.**

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Response:

The Housing Alliance of Pennsylvania generally supported the plan but recommended a greater amount be made for legal services, specifically \$2 million be made available statewide for this purpose.

DCED Response: DCED recognizes the need for legal services representation in preventing homelessness and assisting homeless people in securing housing. DCED will give consideration to allocate additional funds for legal services if HPRP funds become unallocated or otherwise available because they cannot be expended under other components of this Action Plan for HPRP funds.

The Office of Mental Health and Substance Abuse Service (OMHSAS) solicited and gathered comments from county governments and provider agencies. The following comments were submitted through this process:

- Underserved population groups will need further definition.

DCED Response: This population group will be defined locally in applications to be submitted. It could include recently unemployed veterans from the Iraq and Afghanistan Wars, those with limited English proficiency, people with disabilities, or immigrant population groups. However, applicants must document the lack of, or inadequate availability of, services/assistance as instructed in the application guidelines.

- The sources of locally controlled funds should be defined rather than just referencing “may include”.

DCED Response: DCED will be very flexible and broad in defining “locally controlled funds.” DCED will defer to localities to identify and determine what federal, state, local, or private funds are locally controlled.

- Counties are interpreting “locally controlled” funds as a match. The final document must be clear if these funds are a “match” and what are the match requirements.

DCED Response: DCED views “locally controlled funds” as leverage and not as a required match. DCED views these funds as a commitment made by the county. There is no required match for HPRP funds. DCED will provide applicant training to give examples of acceptable commitments and potential means to make such a commitment. DCED added clarification in the Action Plan on this point.

- The draft Action Plan gives highest priority to newly-homeless people who are not chronically homeless and have the greatest likelihood of becoming stabilized within 18 months. The reference to “stability” should be clarified as meaning “stably housed” or “without need for HPRP or other homeless funding.”

DCED Response: DCED agrees with this comment and will clarify that “stabilized” means that there is a reasonable prospect that the individual / family will be able to financially maintain a housing placement after HPRP financial assistance ceases.

- The reference to scoring applicants on cost savings should be clarified as to whom and how applicants substantiate cost savings. Cost savings is a very illusive concept. Many programs can point to it, but how real is the cost and does this result in cost shifts, etc.

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DCED Response: DCED will address and better define this point in the application guidelines. The cost savings to be documented will be savings in state and/or local funding, even if cost shifting may occur to other non-state sources. DCED also clarified this point in the Action Plan.

- The Collaboration section does not reference state or local organizations that have planning, funding, organizational or oversight responsibilities for health, mental health, substance abuse, developmental or related services or resources. This is a serious omission. In some cases, these organizations are key to already existing local homeless prevention efforts in Pennsylvania or, conversely, these organizations have not been present when needed.

DCED Response: While not identifying these organizations and agencies by name, they are a part of the membership of the local and regional Continuums of Care. To further emphasize their importance, DCED will reference these groups as partners in the collaboration efforts through the local Continuum of Care and County Housing Partnerships.

- The Underserved Populations and Pilot Initiatives component is not clear as to whether the “measures of financial stability” refers to stability of the program/agency or the individuals served.

DCED Response: DCED will clarify in the application guidelines that it is measures of financial stability for the persons served.

- The Underserved Populations and Pilot Initiatives component does not detail the “specific outcome measures,” which will be required. It is not clear whether DCED has specific outcomes that they are considering, or whether different projects will be measured in different manners.

DCED Response: DCED will provide additional information in the application guidelines.

- The description of monitoring is not clear whether DCED will perform a desk audit for each of the sub-grantees semi-annually or within DCED as the primary grantee.

DCED Response: DCED will conduct semi-annual desk audits of sub-grantees receiving HPRP funds from DCED through review of reports, IDIS and other reports that may be required.

- It is not clear if “locally controlled funds” will include HealthChoices Reinvestment funds.

DCED Response: DCED will include any funds that are used to pay for supportive services cost for permanent housing for formerly homeless people.

- It is not clear whether “Base Grant Allocations” for counties opting out of participating in the County Housing Partnerships will be redistributed in the base grant category or the “Need Factor Allocation”.

DCED Response: These funds may be reallocated using the Need Factor.

- Is underserved defined as people who are not able to get housing?

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DCED Response: The underserved populations would be defined locally.

- Will DCED be looking for pilots that have ability to sustain themselves?

DCED Response: Yes.

- Was the exclusion of county mental health/mental retardation agencies an error?

DCED Response: There are word limitations for the Action Plan. Other agencies may be identified and listed for both the County Housing Partnerships and collaborative efforts through the local or regional Continuums of Care. DCED added clarification on this point in the Action Plan.

- For the Underserved Populations and Pilot Initiatives, it is not clear if there is a limitation on the organizations to which the cost savings can accrue

DCED Response: Cost savings can be for any programs demonstrating savings of state and/or local funds in serving homeless individuals and families or preventing homelessness that can be clearly documented.

- Will there be an RFP or any other type of further guidance issued to potential sub-recipients for the Underserved Populations and Pilot Initiatives grants?

DCED Response: DCED will issue application guidelines and forms.

- Will any grant applicant or county be required to use HMIS?

DCED Response: Homeless service and housing providers will be required to participate in HMIS.

- It would appear counties can determine what portion of the amount awarded by DCED can be “matched” with “locally controlled funds” to support the provision of the supportive services needed to allow formerly homeless people to occupy permanent housing.”

DCED Response: There is no match requirement. Counties are asked to provide leverage through a commitment of local funds. Counties will determine the amount they will provide and DCED will provide further guidance through applicant training.

- One county indicated a concern about the requirement that County Housing Partnerships identify new local funds for support services for permanent housing for homeless if they are being helped with HPRP resources. While supporting such activities, the concern was due to the difficulty achieving this requirement in the current economic downturn. This county prefers the requirement similar to the Shelter Plus Care commitment that shows existing support services be made available.

DCED Response: The Action Plan does not request new local funding be used for support services. It does ask the county and its partners to identify available sources of funds that can be used for support services but were not considered in the past, such as state Homeless Assistance Program (HAP) funds, Community Development Block Grant (CDBG) funds, or Community Service Block Grant (CSBG) funds. The County Housing Partnerships applications will need to contain a commitment letter that would identify the source of the funds and the amount of funds being committed to pay support services costs for permanent housing.

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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 (BOTH)**
- Formula Allocation (BOTH)**
- Other (Specify: _____)**

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

Response:

All counties will be eligible to receive a portion of \$20,065,428 pursuant to a formula. DCED developed an allocation formula using the following need factors: 2007 homeless population count, number of working-age unemployed persons, and number of persons receiving food stamps. DCED established base grant amounts along with these need factors to assure an appropriate-sized grant for each county. In setting the DCED formula amount distributed to each county, DCED reduced the base grant amount for those counties or cities receiving HPRP funds directly from HUD.

Counties must submit a notice to DCED of their intent to participate in the formula portion of the program. DCED will inform participating counties of their final allocation amounts by June 30, 2009.

DCED will reserve \$1,800,487 for competitive grants up to \$200,000 for the following uses:

- **Underserved Population Groups:** These grants will cover people traditionally underserved or not served through the formula distribution process via counties. Counties that cannot commit to the conditions of the County Housing Partnerships formula distribution will be eligible under this component; however, no county will be eligible for an amount greater than the amount under the formula distribution.
- **Pilot Initiatives:** These grants will fund initiatives that effectively prevent homelessness and rapidly re-housing homeless people.

DCED will reserve \$585,287 to support Legal Services that assist people to stay in their home or secure housing. Funds will be available to nonprofit entities demonstrating the capacity to distribute the funds to a statewide network of legal service agencies.

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- 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:

DCED will initiate efforts to allocate funds well in advance of September 2009 to allocate all funds in a timely manner.

Formula Component (County Housing Partnerships)

In May 2009, DCED will notify all counties of the opportunity to receive a formula award through the County Housing Partnerships component of DCED's HPRP funding, along with the preliminary allocation amount. DCED will require that counties submit a Notice of Intent by June 15, 2009.

Once counties have made their decision to participate, DCED will recalculate the formula award based upon the counties that commit to submit an application. DCED will inform participating counties of their final allocation amounts by June 30, 2009. Counties must submit a completed application by July 31, 2009.

All counties in Pennsylvania have access to HUD's electronic Integrated Disbursement and Information System (IDIS) to quickly access funds distributed to them.

Competitive Components (Underserved Populations, Pilot Initiatives, and Legal Services)

The application due date for Underserved Populations, Pilot Initiatives, and Legal Services will be June 15, 2009.

If DCED does not receive sufficient eligible applications under this component, DCED will transfer these funds to the County Housing Partnerships component to be distributed by formula.

All applicants must demonstrate capacity or have an agreement with a local government entity that has the capacity to draw funds via HUD's IDIS.

- 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:

County Housing Partnerships

DCED intends to provide HPRP funds to counties to facilitate an increase in their existing programs that provide emergency rental assistance payments, case management, and related services to prevent homelessness. DPW's state Homeless Assistance Program

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(HAP) provides these existing services. As a condition of receiving the increased funding from DCED, counties must demonstrate how they will leverage locally controlled funds to support the provision of the supportive services needed to allow formerly homeless people to occupy permanent housing. Such funds may include HAP, CSBG, CDBG or other resources identified by the county. These supportive services are critical to make additional permanent, supportive housing available for this population. Increased availability of permanent, supportive housing should reduce client recidivism and lessen the demand for existing local homeless services funds in the future.

The applications submitted by the counties must identify the amount of locally controlled funds that will be directed to pay the supportive services costs for permanent housing and an estimate of the increased number of permanent, supportive housing units that will be assisted with the identified funds. These leveraged funds are a required commitment, not a required match.

Counties must also identify specific local priorities for households being assisted using the following framework:

- Highest priority will be given to newly homeless people who are not chronically homeless and have the greatest likelihood of becoming stabilized with housing within the 18-month limit of HPRP assistance.
- Priorities for homelessness prevention activities for people at risk of homelessness must identify specific criteria that demonstrate assistance is critical to avoid homelessness, as required in the HUD Notice.

Underserved Populations and Pilot Initiatives

DCED will provide competitive grants to proposals that demonstrate that resources are unavailable or extremely limited. Applicants must describe and DCED will score applicants on the following criteria:

- Cost savings to be experienced by state or local sources.
- Reduction in time that people are homeless
- Measures of financial stability
- Other specific outcome measures to be achieved as a result of competitive grant funding.
- Programmatic experience and capacity to implement activities

Legal Services

DCED will allocate funds for this activity separately because of the unique nature of this service and its benefits in reducing homelessness. (These funds may not be used for criminal activity cases leading to eviction.) DCED may also collaborate with PHFA to distribute these funds.

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Monitoring

DCED staff will review and monitor the use of HPRP funds in compliance with the statute and HUD Notice. DCED will enhance its monitoring efforts by utilizing a new grant tracking system to undertake contract monitoring and will secure reports from grantees as well as IDIS drawdown reports regarding the timely expenditure of funds. DCED will perform, in addition to its monitoring efforts, a desk audit process that occurs at least semi-annually.

Any grantee that has not expended at least 30% of its funds during the first year will be subject to review and reallocation of funds to grantees that are performing successfully. DCED may re-allocate funds in future years if grantees do not meet timeliness requirements.

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:

DCED coordinated the development of this Action Plan with DPW (primary recipient of HHS's ARRA funds) because of the availability of state funds that provide emergency rental payments and other services to prevent or end homelessness. This collaboration will identify new ways to use existing state and federal resources more effectively to address the problems of homelessness through increased availability of supportive housing.

Counties receiving HPRP funding through DCED will determine the local administrating agency in its application to DCED. That application must demonstrate, via a local Memorandum of Understanding (MOU), that a County Housing Partnership exists that includes, at a minimum:

- County HAP agency and/or other appropriate county agencies such as mental health and agencies meeting health or disability needs.
- One or more local housing providers (housing authority, community development agency, and/or community action agency)
- Local government agency(s) administering HPRP funds, for any cities and counties receiving a direct allocation of HPRP funds from HUD

DCED also coordinated this Action Plan and expenditure of HPRP funds with DPW in an effort to seek additional federal funding through the ARRA TANF Emergency Funds that HHS will allocate to DPW. The TANF Emergency Funds initiative will reimburse the Commonwealth for additional funds spent on housing and relocation/moving expenses. DCED will provide reports to DPW in accessing these funds.

Additionally, DCED shared the draft Action Plan with other state agencies that administer ARRA funds from Education, Homeland Security and Labor.

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- 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:

Each county must identify how the County Housing Partnership will collaborate with the local or regional "Continuum of Care" which coordinates HUD and local homelessness programs.

The County Housing Partnerships must include representation from the local or regional Continuum of Care. These County Housing Partnerships will have the local responsibility for collaboration with the Continuums of Care, as well as the other relevant agencies that have resources that could benefit homeless people and those at risk of homelessness. These Continuums of Care should include agencies that meet the variety of needs for homeless persons, including health, mental health, substance abuse and disability service needs.

DCED and DPW co-chair the statewide Homelessness Steering Committee, which provides guidance and leadership to the four regional Continuums of Care that cover the smaller cities and rural areas of the state. This committee also coordinates its efforts with the federal entitlement Continuums of Care through a subcommittee of those entitlement Continuums. DCED consulted with both the full committee and subcommittee in the development of this Action Plan.

- 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:

This Action Plan for the use of HPRP funds is consistent with the Commonwealth's Consolidated Plan because the Consolidated Plan includes a goal statement that directs state and local agencies to use a Continuum of Care to address the economic, social, and health problems of homeless people. The Consolidated Plan acknowledges that the needs of homeless people are diverse, not just economic.

HPRP funds will provide an opportunity to address the needs of newly homeless people and those people who are newly at risk of homelessness through substantially increased funding. DCED will use this one-time funding to meet those needs and help counties restructure the use of their existing local funding to address the problems of the traditional and chronically homeless population more effectively.

Specifically, as a condition of receiving the increased funding from DCED, counties must commit a portion of their locally controlled funds to support the provision of the supportive services needed to allow formerly homeless people to occupy permanent housing. These supportive services are critical to make additional permanent, supportive housing available for this population. Increased availability of permanent, supportive housing should subsequently reduce client recidivism and lessen the demand for local homeless services funds in the future.

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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 | \$7,453,560 | \$7,453,561 | \$14,907,121 |
| Housing Relocation and Stabilization Services ² | \$3,479,398 | \$3,479,396 | \$6,958,794 |
| Subtotal (add previous two rows) | \$10,932,958 | \$10,932,957 | \$21,865,915 |
| | | | |

| | |
|---|---------------------|
| Data Collection and Evaluation ³ | \$375,000 |
| Administration (up to 5% of allocation) | \$1,170,569 |
| Total HPRP Amount Budgeted⁴ | \$23,411,484 |

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.

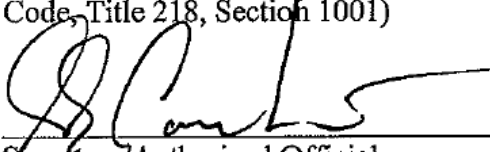
³Data collection and evaluation includes costs associated with operating HUD-approved homeless management information systems for purposes of collecting unduplicated counts of homeless persons and analyzing patterns of use of HPRP funds.

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

May 18, 2009
Date

George E. Cornelius
Acting Secretary
Department of Community and Economic Development

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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

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- (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.

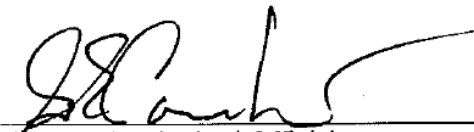
Anti-Lobbying -- To the best of the state, territory, or local government's knowledge and belief:

- 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

May 18, 2009

Date

Acting Secretary

Title

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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

May 18, 2009
Date

Acting Secretary
Title

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

Pennsylvania Department of Community and Economic Development (DCED)

Homelessness Prevention and Rapid Re-housing Program (HPRP)

**Description of the Funding Formula
For
County Housing Partnerships**

Department of Community and Economic Development (DCED) developed a formula to allocate Homelessness Prevention and Rapid Re-housing Program (HPRP) funds using the following methodology.

All counties will be eligible to receive a portion of \$20,365,910 pursuant to a formula developed by DCED. DCED developed an allocation formula using both a base grant amount to assure an appropriate-sized grant for each county, and a need factor based upon population risk factors.

The following population risk factors are used to develop the need factor that indicates the presence of homelessness, as well as the risk of homelessness:

- Homeless population count in 2007 (most recent year completed with both sheltered and unsheltered count of the homeless people)
- Number of working-age unemployed persons in March 2009
- Number of persons receiving food stamps in February 2009

The need factor is calculated by adding the number of people in all three categories in each county. Then, each county's total is calculated as a percentage of the total for all counties. This percentage is used to distribute a portion of the funds under the formula.

The base grant amounts are as follows:

| <u>County Population</u> | <u>Base Grant Amount</u> |
|--------------------------|--------------------------|
| Less than 30,000 | \$25,000 |
| 30,000 to 59,999 | \$150,000 |
| 60,000 to 139,999 | \$300,000 |
| 140,000 and up | \$400,000 |

The base grant amount will be reduced if the county, or a city within a county, received HPRP funds directly from HUD. Those counties that receive more HPRP funds will receive a smaller, or potentially no base grant amount under this formula. The base grant allocated to counties where one or more local governments receive HPRP funds are listed below:

| <u>Local HPRP Funding</u> | <u>Adjusted Base Grant Amount</u> |
|---------------------------|-----------------------------------|
| Over \$2 million | \$0 |

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

| | |
|-------------------------|-----------|
| \$750,000 - \$1,999,999 | \$150,000 |
| Under \$750,000 | \$250,000 |

A total of \$11,700,000 is awarded using the base grant amounts. The remaining amount from the total distributed by formula (\$8,665,906) is awarded using the need factor. The base grant amount and the need factor amount are then added to reach the total HPRP allocation from DCED.

In May 2009, DCED will notify all counties of the opportunity to receive a formula award through the County Housing Partnerships component of DCED's HPRP funding, along with the preliminary allocation amount. DCED will require that counties submit a Notice of Intent by June 15, 2009.

Once counties have made their decision to participate, DCED will recalculate the formula award based upon the counties that commit to submit an application. The final allocation amount will be provided to participating counties by June 30, 2009. Counties seeking County Housing Partnership funds must submit a completed application by July 31, 2009.

The preliminary allocations using this methodology are found on the following pages.

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

| County | POPULATION RISK FACTORS | | | Total of Population Risk Factors | Need Factor (County Percent of Population Risk Factors) | HUD Direct HPRP Allocation | 2008 County Population | Formula Calculations | | |
|------------|-----------------------------|----------------------------------|--------------------------------|----------------------------------|---|----------------------------|------------------------|-----------------------|------------------------|---------------------------------|
| | CoC/PIT Homeless Count 2007 | March 2009 Unemployed Population | Food Stamp Recipients Feb 2009 | | | | | Base Grant Allocation | Need Factor Allocation | Total HPRP Allocation from DCED |
| Adams | 71 | 4,300 | 4,536 | 8,907 | 0.4883% | 0 | 101,119 | \$300,000 | \$43,905.00 | \$343,905.00 |
| Allegheny | 1380 | 43,100 | 123,225 | 167,705 | 9.1948% | 14,063,957 | 1,215,103 | | \$826,654.00 | \$826,654.00 |
| Armstrong | 114 | 3,400 | 8,150 | 11,664 | 0.6395% | 0 | 68,790 | \$300,000 | \$57,494.00 | \$357,494.00 |
| Beaver | 213 | 7,500 | 19,899 | 27,612 | 1.5139% | 1,596,719 | 172,476 | \$150,000 | \$136,105.00 | \$286,105.00 |
| Bedford | 10 | 3,000 | 4,795 | 7,805 | 0.4279% | 0 | 49,727 | \$150,000 | \$38,473.00 | \$188,473.00 |
| Berks | 463 | 18,000 | 45,952 | 64,415 | 3.5317% | 2,376,680 | 403,595 | | \$317,515.00 | \$317,515.00 |
| Blair | 100 | 5,000 | 16,705 | 21,805 | 1.1955% | 819,718 | 125,174 | \$150,000 | \$107,482.00 | \$257,482.00 |
| Bradford | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. |
| Bucks | 254 | 26,300 | 23,440 | 49,994 | 2.7410% | 975,905 | 621,643 | \$150,000 | \$246,431.00 | \$396,431.00 |
| Butler | 76 | 7,300 | 10,911 | 18,287 | 1.0026% | 0 | 182,902 | \$400,000 | \$90,141.00 | \$490,141.00 |
| Cambria | 31 | 6,100 | 16,852 | 22,983 | 1.2601% | 644,490 | 144,319 | \$250,000 | \$113,288.00 | \$363,288.00 |
| Cameron | 0 | 400 | 811 | 1,211 | 0.0664% | 0 | 5,266 | \$25,000 | \$5,969.00 | \$30,969.00 |
| Carbon | 0 | 3,300 | 5,717 | 9,017 | 0.4944% | 0 | 63,558 | \$300,000 | \$44,447.00 | \$344,447.00 |
| Centre | 40 | 4,400 | 6,528 | 10,968 | 0.6013% | 0 | 144,779 | \$400,000 | \$54,064.00 | \$454,064.00 |
| Chester | 387 | 16,400 | 13,809 | 30,596 | 1.6775% | 1,130,871 | 491,489 | \$150,000 | \$150,814.00 | \$300,814.00 |
| Clarion | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. |
| Clearfield | 13 | 4,400 | 11,477 | 15,890 | 0.8712% | 0 | 82,896 | \$300,000 | \$78,325.00 | \$378,325.00 |
| Clinton | 1 | 1,800 | 4,337 | 6,138 | 0.3365% | 0 | 37,038 | \$150,000 | \$30,256.00 | \$180,256.00 |
| Columbia | 31 | 3,300 | 5,730 | 9,061 | 0.4968% | 0 | 65,004 | \$300,000 | \$44,664.00 | \$344,664.00 |
| Crawford | 57 | 4,400 | 11,770 | 16,227 | 0.8897% | 0 | 88,411 | \$300,000 | \$79,986.00 | \$379,986.00 |
| Cumberland | 97 | 8,300 | 8,755 | 17,152 | 0.9404% | 558,742 | 229,361 | \$250,000 | \$84,546.00 | \$334,546.00 |
| Dauphin | 412 | 10,200 | 27,750 | 38,362 | 2.1033% | 1,476,665 | 256,562 | \$150,000 | \$189,095.00 | \$339,095.00 |
| Delaware | 696 | 20,400 | 46,233 | 67,329 | 3.6915% | 3,085,064 | 553,619 | | \$331,879.00 | \$331,879.00 |
| Elk | 13 | 2,400 | 3,026 | 5,439 | 0.2982% | 0 | 32,268 | \$150,000 | \$26,810.00 | \$176,810.00 |
| Erie | 375 | 12,400 | 42,479 | 55,254 | 3.0294% | 1,458,364 | 279,175 | \$150,000 | \$272,359.00 | \$422,359.00 |
| Fayette | 87 | 6,400 | 27,125 | 33,612 | 1.8429% | 0 | 143,925 | \$400,000 | \$165,681.00 | \$565,681.00 |
| Forest | 0 | 300 | 563 | 863 | 0.0473% | 0 | 6,825 | \$25,000 | \$4,254.00 | \$29,254.00 |
| Franklin | 102 | 7,000 | 9,206 | 16,308 | 0.8941% | 0 | 143,495 | \$400,000 | \$80,386.00 | \$480,386.00 |
| Fulton | 12 | 1,200 | 1,329 | 2,541 | 0.1393% | 0 | 14,935 | \$25,000 | \$12,525.00 | \$37,525.00 |
| Greene | 2 | 1,400 | 6,083 | 7,485 | 0.4104% | 0 | 39,344 | \$150,000 | \$36,895.00 | \$186,895.00 |

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

| County | POPULATION RISK FACTORS | | | Total of Population Risk Factors | Need Factor (County Percent of Population Risk Factors) | HUD Direct HPRP Allocation | 2008 County Population | Formula Calculations | | |
|----------------|-----------------------------|----------------------------------|--------------------------------|----------------------------------|---|----------------------------|------------------------|-----------------------|------------------------|---------------------------------|
| | CoC/PIT Homeless Count 2007 | March 2009 Unemployed Population | Food Stamp Recipients Feb 2009 | | | | | Base Grant Allocation | Need Factor Allocation | Total HPRP Allocation from DCED |
| Huntingdon | 19 | 2,800 | 4,633 | 7,452 | 0.4086% | 0 | 45,543 | \$150,000 | \$36,733.00 | \$186,733.00 |
| Indiana | 63 | 3,400 | 7,685 | 11,148 | 0.6112% | 0 | 87,479 | \$300,000 | \$54,951.00 | \$354,951.00 |
| Jefferson | 32 | 2,200 | 5,449 | 7,681 | 0.4211% | 0 | 45,105 | \$150,000 | \$37,861.00 | \$187,861.00 |
| Juniata | 9 | 1,100 | 1,649 | 2,758 | 0.1512% | 0 | 23,146 | \$25,000 | \$13,595.00 | \$38,595.00 |
| Lackawanna | 222 | 9,100 | 23,479 | 32,801 | 1.7984% | 1,401,868 | 209,408 | \$150,000 | \$161,683.00 | \$311,683.00 |
| Lancaster | 589 | 19,700 | 35,213 | 55,502 | 3.0430% | 2,120,286 | 502,370 | | \$273,581.00 | \$273,581.00 |
| Lawrence | 91 | 4,200 | 12,729 | 17,020 | 0.9332% | 0 | 90,272 | \$300,000 | \$83,895.00 | \$383,895.00 |
| Lebanon | 37 | 5,000 | 11,217 | 16,254 | 0.8912% | 0 | 128,934 | \$300,000 | \$80,119.00 | \$380,119.00 |
| Lehigh | 253 | 15,500 | 34,924 | 50,677 | 2.7785% | 2,391,143 | 339,989 | | \$249,798.00 | \$249,798.00 |
| Luzerne | 188 | 15,500 | 39,049 | 54,737 | 3.0011% | 2,851,135 | 311,983 | | \$269,810.00 | \$269,810.00 |
| Lycoming | 91 | 5,600 | 12,243 | 17,934 | 0.9833% | 518,859 | 116,670 | \$250,000 | \$88,401.00 | \$338,401.00 |
| McKean | 12 | 2,200 | 5,806 | 8,018 | 0.4396% | 0 | 43,537 | \$150,000 | \$39,522.00 | \$189,522.00 |
| Mercer | 45 | 5,600 | 15,916 | 21,561 | 1.1821% | 0 | 116,652 | \$300,000 | \$106,279.00 | \$406,279.00 |
| Mifflin | 17 | 2,500 | 5,855 | 8,372 | 0.4590% | 0 | 46,062 | \$150,000 | \$41,267.00 | \$191,267.00 |
| Monroe | 45 | 7,800 | 15,716 | 23,561 | 1.2918% | 0 | 165,058 | \$400,000 | \$116,137.00 | \$516,137.00 |
| Montgomery | 526 | 29,600 | 27,209 | 57,335 | 3.1435% | 1,514,639 | 778,048 | \$150,000 | \$282,616.00 | \$432,616.00 |
| Montour | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. |
| Northampton | 214 | 12,900 | 22,089 | 35,203 | 1.9301% | 738,192 | 294,787 | \$250,000 | \$173,523.00 | \$423,523.00 |
| Northumberland | 13 | 5,100 | 8,147 | 13,260 | 0.7270% | 0 | 91,091 | \$300,000 | \$65,361.00 | \$365,361.00 |
| Perry | 0 | 2,000 | 3,058 | 5,058 | 0.2773% | 0 | 45,185 | \$150,000 | \$24,932.00 | \$174,932.00 |
| Philadelphia | 7640 | 60,500 | 356,189 | 424,329 | 23.2648% | 21,486,240 | 1,447,395 | | \$2,091,608.00 | \$2,091,608.00 |
| Pike | 3 | 2,600 | 4,018 | 6,621 | 0.3630% | 0 | 59,664 | \$150,000 | \$32,636.00 | \$182,636.00 |
| Potter | 0 | 1,000 | 2,111 | 3,111 | 0.1706% | 0 | 16,720 | \$25,000 | \$15,335.00 | \$40,335.00 |
| Schuylkill | 43 | 7,900 | 15,609 | 23,552 | 1.2913% | 0 | 147,254 | \$400,000 | \$116,093.00 | \$516,093.00 |
| Snyder | 10 | 2,000 | 2,521 | 4,531 | 0.2484% | 0 | 38,074 | \$150,000 | \$22,334.00 | \$172,334.00 |
| Somerset | 78 | 3,600 | 7,423 | 11,101 | 0.6086% | 0 | 77,454 | \$300,000 | \$54,719.00 | \$354,719.00 |
| Sullivan | 1 | 300 | 450 | 751 | 0.0412% | 0 | 6,124 | \$25,000 | \$3,702.00 | \$28,702.00 |
| Susquehanna | 1 | 1,900 | 3,761 | 5,662 | 0.3104% | 0 | 40,831 | \$150,000 | \$27,909.00 | \$177,909.00 |
| Tioga | 45 | 2,400 | 3,652 | 6,097 | 0.3343% | 0 | 40,574 | \$150,000 | \$30,053.00 | \$180,053.00 |
| Union | 13 | 1,800 | 2,422 | 4,235 | 0.2322% | 0 | 43,640 | \$150,000 | \$20,875.00 | \$170,875.00 |

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

| County | POPULATION RISK FACTORS | | | Total of Population Risk Factors | Need Factor (County Percent of Population Risk Factors) | HUD Direct HPRP Allocation | 2008 County Population | Formula Calculations | | |
|--------------|-----------------------------|----------------------------------|--------------------------------|----------------------------------|---|----------------------------|------------------------|-----------------------|------------------------|---------------------------------|
| | CoC/PIT Homeless Count 2007 | March 2009 Unemployed Population | Food Stamp Recipients Feb 2009 | | | | | Base Grant Allocation | Need Factor Allocation | Total HPRP Allocation from DCED |
| Venango | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. |
| Warren | 13 | 1,800 | 3,995 | 5,808 | 0.3184% | 0 | 40,728 | \$150,000 | \$28,629.00 | \$178,629.00 |
| Washington | 172 | 8,400 | 19,249 | 27,821 | 1.5254% | 1,762,094 | 206,407 | \$75,000 | \$137,136.00 | \$212,136.00 |
| Wayne | 0 | 2,100 | 4,961 | 7,061 | 0.3871% | 0 | 52,016 | \$150,000 | \$34,805.00 | \$184,805.00 |
| Westmoreland | 112 | 15,600 | 32,265 | 47,977 | 2.6305% | 1,832,195 | 361,589 | \$150,000 | \$236,489.00 | \$386,489.00 |
| Wyoming | 0 | 1,400 | 2,970 | 4,370 | 0.2396% | 0 | 27,759 | \$25,000 | \$21,541.00 | \$46,541.00 |
| York | 223 | 18,400 | 31,295 | 49,918 | 2.7369% | 1,768,341 | 424,583 | \$75,000 | \$246,057.00 | \$321,057.00 |
| Total | 15,857 | 515,900 | 1,292,150 | 1,823,907 | 100.0000% | \$66,572,167 | | \$11,075,000 | \$8,990,428 | \$20,065,428 |