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>City of Knoxville</th>
</tr>
</thead>
<tbody>
<tr>
<td>Name of Entity or Department Administering Funds</td>
<td>Community Development Department</td>
</tr>
<tr>
<td>HPRP Contact Person (person to answer questions about this amendment and HPRP)</td>
<td>Becky Wade</td>
</tr>
<tr>
<td>Title</td>
<td>Community Development Administrator</td>
</tr>
<tr>
<td>Address Line 1</td>
<td>400 Main Street</td>
</tr>
<tr>
<td>Address Line 2</td>
<td>P.O. Box 1631</td>
</tr>
<tr>
<td>City, State, Zip Code</td>
<td>Knoxville, TN 37901</td>
</tr>
<tr>
<td>Telephone</td>
<td>865-215-2120</td>
</tr>
<tr>
<td>Fax</td>
<td>865-215-2962</td>
</tr>
<tr>
<td>Email Address</td>
<td><a href="mailto:bwade@cityofknoxville.org">bwade@cityofknoxville.org</a></td>
</tr>
<tr>
<td>Authorized Official (if different from Contact Person)</td>
<td>Bill Haslam</td>
</tr>
<tr>
<td>Title</td>
<td>Mayor</td>
</tr>
<tr>
<td>Address Line 1</td>
<td>400 Main Street</td>
</tr>
<tr>
<td>Address Line 2</td>
<td>P.O. Box 1631</td>
</tr>
<tr>
<td>City, State, Zip Code</td>
<td>Knoxville, TN 37901</td>
</tr>
<tr>
<td>Telephone</td>
<td>865-215-2040</td>
</tr>
<tr>
<td>Fax</td>
<td>865-215-2085</td>
</tr>
<tr>
<td>Email Address</td>
<td><a href="mailto:Mayor@cityofknoxville.org">Mayor@cityofknoxville.org</a></td>
</tr>
<tr>
<td>Web Address where this Form is Posted</td>
<td><a href="http://www.cityofknoxville.org/development">www.cityofknoxville.org/development</a></td>
</tr>
</tbody>
</table>

| Amount Grantee is Eligible to Receive* | $771,803 |
| Amount Grantee is Requesting           | $771,803 |

*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: Prior to submission of the substantial amendment, a public meeting was held on April 14, 2009. Approximately 600 postcards were mailed to citizens and agencies inviting them to the meeting. The meeting was also announced in our weekly neighborhoods newsletter that is sent via e-mail to approximately 300 persons. During this meeting the Homelessness Prevention and Rapid Re-Housing Program (HPRP) was announced and eligible activities were explained. Comments were taken and are included in this plan. Comments will continue to be accepted following posting of this substantial amendment on the City of Knoxville's web-site for 12 days and will be included in the final plan submitted to the Department of Housing and Urban Development.

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 from the April 14, 2009 Public Meeting
1. A comment was made regarding the need for support of legal services to residents facing eviction and foreclosure to prevent homelessness.
2. A question was asked regarding what agencies in Knoxville are dealing with the foreclosure problem.
3. Two comments were made regarding the need for foreclosure prevention funding.
4. A question was asked regarding the definition of "homelessness prevention" in reference to HPRP and who made the definition.
5. A comment was made that it would be beneficial for homelessness prevention money be directed to literacy and adult education programs.
6. A question was asked about whether HPRP funds can be used to re-house persons that have experienced foreclosure.
7. A comment was made regarding the need for homeless programs to focus on felons.
8. A comment was made requesting that the City communicate with citizens about other streams of stimulus money.

Comments and questions were recorded and questions were addressed during the meeting.

One comment was received during the public comment period via e-mail and is included below.

"I would like to suggest an overflow program to work along with the selected subcontractors for the HPRP plan. this is to ensure that persons who reside in homeless shelters or facilities are given an option to move out into a program where they can continue their independence once an income has been established for them. this will also help to ensure beds available to those who have no income or home. It will also enforce those with an income to stand on their own and stop using tax payers money to support them when they have an income of their own. basically it is called 'Managing homeless evaluations and criteria.' I will be at the May 5,09 meeting to submit more information regarding the backup or overflow program for this cause. thank you. I will hope to be able to voice my program information at this meeting."

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: ____________________________)

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

   Response: After receiving notification of HPRP funding and receipt of the regulation governing the program, the City of Knoxville's Community Development Department developed an application for subrecipient funding. On March 30, 2009, this
application and regulations were distributed via e-mail to the Homeless Coalition list-serv as well as other agencies who had requested an application package. In an effort to meet the requirements of the HPRP program in a timely, transparent and efficient manner, it was advertised that no start-up projects would be funded. Agencies currently involved in homelessness prevention and re-housing activities were encouraged to apply. Applications were accepted on April 13, 2009. The applications were reviewed and rated with input from staff involved with the Continuum of Care and the Mayors' Ten Year Plan to End Chronic Homelessness. Two agencies currently engaged in carrying out three projects have been selected to implement the eligible activities of the HPRP.

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: When HUD signs the grant agreement to allocate HPRP funds to the City of Knoxville, we will be ready to draft contracts with our subgrantees to take to our City Council for approval. If our grant agreement is received in July 2009, we will be able to have contracts signed in August 2009, and funds will be made available immediately.

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: As outlined above, the City of Knoxville will be funding subgrantees currently engaged in homelessness prevention and rapid re-housing activities. In this way, the city of Knoxville will ensure effective and timely use of HPRP funds. These projects will be enhanced by the addition of HPRP funds so they are able to assist more families facing homelessness or those in need of re-housing. Knoxville-Knox County Community Action Committee (CAC) will administer two projects. The Ten Year Plan Case Management project will focus on stabilization services to prevent residents at risk of eviction from losing their housing and becoming homeless. This project will be funded in the amount of $518,000 in HPRP funds which will cover operation for two years. This project has been in operation since September 2008 and has been successful in reducing the number of evictions at four public housing properties that serve elderly and disabled residents. CAC's Homeward Bound project, in operation for many years, will use HPRP funding in the amount of $107,213 to provide short term and medium term financial assistance to households for a two year period. This project is experiencing an increase in need for services due to the current economic crisis. HPRP funds will be made available to households at risk of becoming homeless due to a recent lay-off, reduction of hours, or other catastrophic event. Funding will also be used to re-house homeless households by paying delinquent housing/utility bills, deposits and/or first month's rent. This project will focus on those households that are most likely to maintain stable housing as a result of this temporary assistance. Recovery Act funds available to CAC through the Community
Services Block Grant Program will be used to provide the case management for the Homeward Bound project. The third subgrantee to be funded with HPRP funds is Legal Aid of East Tennessee (LAET) for their Homeless Prevention project. The project will be funded in the amount of $108,000 for a period of one year. LAET will expand its current project to increase the number of persons served with legal representation. The goal of the program is to provide education and direct representation to low-income persons in danger of losing their housing through eviction.

Each project will be assigned a project manager from the Community Development Department staff who will be responsible for monitoring the projects for compliance with HPRP regulations. Project objectives and milestones will be included in the subgrantee agreements, and project managers will review invoices for accuracy and eligible costs.

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: The Knoxville-Knox County Coalition for the Homeless is an organization that convenes the local agencies responsible for administering other non-HPRP federal funding streams. The City of Knoxville will use this established means of coordination and collaboration to assure that Recovery and Reinvestment Act funds from all sources are effectively used to the maximum benefit possible.

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 City of Knoxville’s Community Development Department currently coordinates closely with the Implementation Office of the Knoxville-Knox County Ten Year Plan to End Chronic Homelessness (TYP) and the local Homeless Coalition. TYP staff and the Homeless Coalition jointly coordinate the local Continuum of Care (CoC). As such, established strategies regarding homelessness prevention and rapid re-housing are already aligned among these organizations. In keeping with this, the grantee coordinated directly with the Ten Year Plan Office and Continuum of Care in establishing priorities and selecting programs to use HPRP funds. The selected activities for HPRP funding are designed to maximize use of other mainstream resources in order to help the homeless quickly access housing or to prevent homelessness in the first place, which is consistent with TYP and CoC goals. This direct cooperation will continue in order to assure that the HPRP funds are used as intended, and to carry out the aligned goals of the Ten Year Plan, Continuum of Care and this grantee.
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: The City of Knoxville's Five Year Consolidated Plan identified six priorities that have been the focus of the Community Development Department since 2005. The priorities are: neighborhood stabilization, housing rehabilitation, home ownership, assistance to the homeless, job creation, and crime prevention and safety. The projects selected to implement the HPRP grant will contribute to neighborhood stabilization by reducing the number of vacant properties. The CAC Case Management project has proven to reduce crime and increase safety as evidenced by the reduced number of police calls in the public housing developments. Additionally, the priority of assistance to the homeless will be met by the financial assistance provided through the HPRP grant.
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>Homelessness Prevention</th>
<th>Rapid Re-housing</th>
<th>Total Amount Budgeted</th>
</tr>
</thead>
<tbody>
<tr>
<td>Financial Assistance¹</td>
<td>$ 54,000</td>
<td>$ 53,213</td>
<td>$ 107,213</td>
</tr>
<tr>
<td>Housing Relocation and Stabilization Services²</td>
<td>$ 572,000</td>
<td>$ 54,000</td>
<td>$ 626,000</td>
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<tr>
<td><strong>Subtotal</strong> (add previous two rows)</td>
<td><strong>$ 626,000</strong></td>
<td><strong>$ 107,213</strong></td>
<td><strong>$ 733,213</strong></td>
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<tr>
<td>Data Collection and Evaluation³</td>
<td></td>
<td></td>
<td>$</td>
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<tr>
<td>Administration (up to 5% of allocation)</td>
<td>$38,590</td>
<td>$38,590</td>
<td>$38,590</td>
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<tr>
<td><strong>Total HPRP Amount Budgeted⁴</strong></td>
<td></td>
<td></td>
<td><strong>$ 771,803</strong></td>
</tr>
</tbody>
</table>

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.”
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)

_________________________________________  5/11/09
Signature/Authorized Official          Date

Mayor
Title
# Organization and Project Name | Project Summary | Recommended funding
--- | --- | ---
1 Knoxville-Knox County Community Action Committee - Ten Year Plan | Homelessness prevention through targeted case management of individuals at risk of eviction at four housing sites operated by KCDC for two years. | $518,000
2 Legal Aid of East Tennessee - Homeless Prevention Project | Provision of legal services to families facing eviction and those needing assistance to obtain housing. Funding will be for one year. | $108,000
3 CAC - Homeward Bound | Provision of direct homeless prevention assistance and rapid rehousing funds on a short term (up to $500) and medium term (up to $1200) basis for 150 families over a two year period. | $107,213
4 City Administration - 5% of total | Administration of the HPRP grant, manage projects and monitor for compliance. | $38,590
**Total HPRP Funding** |  | **$771,803**