

STAFF REPORT



ITEM NO. 16
CITY OF OCEANSIDE

DATE: May 6, 2009

TO: Honorable Mayor and City Councilmembers

FROM: Neighborhood Services Department

SUBJECT: **APPROVAL OF A SUBSTANTIAL AMENDMENT ADDING THE HOMELESSNESS PREVENTION AND RAPID RE-HOUSING PROGRAM TO THE FY 2008-09 ACTION PLAN OF THE 2005-2010 CONSOLIDATED PLAN FOR HOUSING AND COMMUNITY DEVELOPMENT, AND AUTHORIZATION FOR THE CITY MANAGER TO SUBMIT THE AMENDMENT TO THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT**

SYNOPSIS

Staff recommends that the City Council approve a substantial amendment adding the Homelessness Prevention and Rapid Re-Housing Program (HPRP) to the FY 2008-09 Action Plan of the 2005-2010 Consolidated Plan for Housing and Community Development, and authorize the City Manager to submit the amendment to the U.S. Department of Housing and Urban Development (HUD).

BACKGROUND

The American Recovery and Reinvestment Act (ARRA) of 2009 (the "Recovery Act") appropriated \$1.5 billion for a Homelessness Prevention Fund to be managed by the U.S. Department of Housing and Urban Development (HUD). This appropriation provides for the Homelessness Prevention and Rapid Re-housing Program (HPRP) with entitlement grants awarded to states and local jurisdictions that meet certain population requirements. HUD has announced that the City of Oceanside is eligible for \$742,971 through the HPRP. HUD guidelines for the HPRP require that eligible jurisdictions file a substantial amendment to the FY 2008-09 Action Plan with HUD using a prescribed form no later than May 19, 2009. This substantial amendment serves as an application for HPRP funds. The guidelines require that the substantial amendment be approved by the local jurisdiction at a public hearing after a twelve-day public comment period.

ANALYSIS

The HPRP is designed for individuals or families (households) that are housed but at risk of becoming homeless and for households that are homeless solely due to the current economic crisis in the nation. The program is not a mortgage assistance program nor does it provide services to chronically homeless persons.

Authorized activities with HPRP funds include short- and medium-term rental assistance, security deposits, utility payments and deposits, and other services needed to prevent participants from becoming homeless, or to assist households to become rapidly re-housed. Households with children are a particular target audience to keep children and youth in school.

Program participants must be at or below fifty percent area median income, have no appropriate housing options identified, and lack the financial resources and/or support networks needed to obtain housing or remain in existing housing. The basic question to be asked is "Would this household be homeless but for this program?" All assisted households must be re-certified for assistance every three months and avail themselves of social, unemployment and other services for which they are eligible. No funds are provided directly to participants.

The Neighborhood Services Department proposes to manage the HPRP in-house although additional staff may be necessary to implement the program or to backfill positions of persons subordinated to HPRP work. Local nonprofit social service agencies including North County Lifeline and Interfaith Community Services, the local school districts and community clinics will all be involved in providing services; the City's primary task will be to provide support for housing for eligible households. Staff of the Neighborhood Services Department have been in contact with these local agencies as well as the Regional Continuum of Care, the Regional Task Force on the Homeless and other jurisdictions in the County to coordinate planning and outreach.

FISCAL IMPACT

The City is eligible to apply for \$742,791 from the Homelessness Prevention and Rapid Re-Housing Program of the Recovery Act of 2009. If awarded, 60 percent of the funds must be spent by September 30, 2011, and completely spent by September 30, 2012. Once the City's HPRP substantial amendment is approved, HUD will prepare a grant agreement for the program; the Neighborhood Services Department will return to the City Council to accept the funds and approve a local HPRP budget. All program delivery costs and staff costs will be paid with HPRP funds; five percent of the grant may be used for management of the program including quarterly reporting and financial management. There will be no impact on the General Fund.

COMMISSION OR COMMITTEE REPORT

The HPRP substantial amendment was presented to the Housing Commission at their April 28, 2009, meeting; the report of the Housing Commission is attached.

CITY ATTORNEY'S ANALYSIS

The City Council is authorized to hold a public hearing in this matter. Consideration of the matter should be based on the testimony and evidence presented at the hearing. After conducting the public hearing, the Council shall approve, modify or reject the plan. The supporting documents have been reviewed and approved as to form by the City Attorney.

RECOMMENDATION

Staff recommends that the City Council approve a substantial amendment adding the Homelessness Prevention and Rapid Re-Housing Program (HPRP) to the FY 2008-09 Action Plan of the 2005-2010 Consolidated Plan for Housing and Community Development, and authorize the City Manager to submit the amendment to the U.S. Department of Housing and Urban Development (HUD).

PREPARED BY:

SUBMITTED BY:



Angie Hanifin
Housing Program Manager



Peter A. Weiss
City Manager

REVIEWED BY:

Michelle Skaggs Lawrence, Deputy City Manager



Margery M. Pierce, Director, Neighborhood Services



Teri Ferro, Director, Financial Services



ATTACHMENTS:

1. Report of the Housing Commission
2. Synopsis of Homelessness Prevention and Rapid Re-Housing Program
3. Substantial Amendment to the FY 2008-09 Action Plan

TO: CITY COUNCIL
FROM: HOUSING COMMISSION
RE: AMENDMENT TO ACTION PLAN
DATE: APRIL 28, 2009

THE HOUSING COMMISSION RECOMMENDS THAT THE CITY COUNCIL APPROVE STAFF'S RECOMMENDATION TO AMEND THE FY 2008-09 ACTION PLAN OF THE FIVE YEAR CONSOLIDATED PLAN TO ADD THE "HOMELESSNESS PREVENTION AND RAPID RE-HOUSING PROGRAM."

CAMP	Absent
COOPER	YES
CHRISTY	YES
DAVIS	YES
FARMER	YES
HUSKEY	YES
PARKER	YES
SORENSEN	YES

ALTERNATE	
SAIZ	YES

Synopsis of Homelessness Prevention & Rapid Re-housing Program

Effective Date:	March 19, 2009
Applications Due:	May 18, 2009
HUD Review:	No later than July 2, 2009
Revisions:	Due within 15 days after HUD notification
Grant agreements:	September 1, 2009
Funds obligated:	September 30, 2009
Application:	Modification /substantial amendment to Consolidated Plan 2008 Action Plan using form HUD-40119; including plan for collaboration with local organizations receiving ARRA funds (CDBG Recovery, FEMA, TANF, Dept of Education, HHSA, Labor, Homeland Security), 10-yr plans and Continuum of Care; consistency with Consolidated Plan
Citizen Participation:	Minimum time period to comment reduced to 12 days; no 2 nd period required, but if required locally, period reduced to 3 days
Reporting Requirements:	As established by ARRA Client level data in a HMIS or comparable database (Required data elements to be included in revised HMIS Data and Technical Standards) Quarterly reports incl. # of unduplicated individuals and families served, # of new jobs created and retained Annual inspections of housing units
Target Population:	People still housed but at risk of becoming homeless; persons already homeless
Requirements for Program Participants:	1) Initial consultation with case manager and process to refer ineligible to other services, 2) Household at or below 50% Area Median Income, 3) Both no appropriate housing options identified <u>and</u> lacks financial resources and support networks needed to obtain immediate housing or remain in existing housing. <u>Would this individual or family be homeless BUT for this assistance?</u>
Authorized Activities:	Financial assistance: short (3 mos) and medium-term (4 – 18 mos) rental assistance, security deposits, utility deposits and payments, moving cost assistance, motel and hotel vouchers (up to 30 days). Minimum needed to prevent participant from becoming homeless or returning to homelessness in near term.

	<p>Housing Relocation and Stabilization Services: case management; outreach and engagement including publicity; housing search and placement; legal services; credit repair including budgeting, money management, resolving credit issues.</p> <p>Data Collection and Evaluation: Operating HMIS, purchase of software/licenses, leasing or purchase of computer equipment, costs of data collection, entry and analysis, and staffing associated with operation and training; costs to participate in HUD research and evaluation</p> <p>Administrative Costs: accounting, preparing reports, audits, training staff to administer program or case managers; pre-award costs related to preparing application, public comment process; no more than 5% of grant; must be shared reasonably with sub-grantees.</p>
Considerations:	Coordination with Recovery Act Resources to create a comprehensive package of housing and service options.
Ineligible Activities:	Financial assistance or services to pay for expenses available through other ARRA programs, including child care and employment training; mortgage costs; construction or rehabilitation; credit care or consumer debt; car repairs or transportation costs; travel costs; food; medical or dental care or medicines; clothing; home furnishings; pet care; work or education materials; cash assistance to participants; discharge planning. Case management certifications, licenses and general training.
Discharge Coordination:	Grantees must develop and implement policies and protocols for discharge from institutions or systems of care
Risk Factors for Prevention Assistance:	Eviction within 2 weeks; discharge within 2 weeks from an institution; residency in condemned housing; sudden and significant loss of income; sudden and significant increase in utility costs; mental health and substance abuse issues; housing costs greater than 50% of income; homeless in last 12 months; young head of household; current or past involvement with child welfare; pending foreclosure of rental housing; extremely low income; credit problems; significant medical debt; recent traumatic life event; etc.
Risk Factors for Rapid Re-housing Assistance:	Sleeping in emergency shelter; sleeping in place not meant for human habitation; staying in hospital or institution; graduation/timing out of transitional housing; victim of domestic violence

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

Grantees eligible to receive funds under the Homelessness Prevention and Rapid Re-Housing Program (HPRP) are required to complete a substantial amendment to their Consolidated Plan 2008 Action Plan. This form sets forth the required format for this substantial amendment. A completed form is due to HUD within 60 days of the publication of the HUD HPRP notice.

To aid grantees in meeting this submission deadline, the HPRP Notice reduces the requirement for a 30-day public comment period to no less than 12 calendar days for this substantial amendment. With this exception, HPRP grantees are required to follow their Consolidated Plan's citizen participation process, including consultation with the Continuum of Care (CoC) in the appropriate jurisdiction(s). Grantees are also required to coordinate HPRP activities with the CoC's strategies for homeless prevention and ending homelessness. To maximize transparency, HUD strongly recommends that each grantee post its substantial amendment materials on the grantee's official website as the materials are developed.

A complete submission contains the following three documents:

- 1) A signed and dated SF-424,
- 2) A completed form HUD-40119 (this form), and
- 3) Signed and dated General Consolidated Plan and HPRP certifications.

For additional information regarding the HPRP program, visit the HUD Homelessness Resource Exchange (www.hudhre.info). This site will be regularly updated to include HPRP resources developed by HUD and its technical assistance providers.

The information collection requirements contained in this application have been submitted to the Office of Management and Budget (OMB) for review under the Paperwork Reduction Act of 1995 (44 U.S.C. 3501-3520). This agency may not collect this information, and you are not required to complete this form, unless it displays a currently valid OMB control number.

Information is submitted in accordance with the regulatory authority contained in each program rule. The information will be used to rate applications, determine eligibility, and establish grant amounts.

Public reporting burden for this collection of information is estimated to be 16 hours, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. This information is required to obtain benefits. To the extent that any information collected is of a confidential nature, there will be compliance with Privacy Act requirements. However, the substantial amendment to the Consolidated Plan 2008 Action Plan does not request the submission of such information.

Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

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

A. General Information

Grantee Name	City of Oceanside, California
Name of Entity or Department Administering Funds	Neighborhood Services Department
HPRP Contact Person (person to answer questions about this amendment and HPRP)	John A. Lundblad
Title	Management Analyst
Address Line 1	300 North Coast Highway
Address Line 2	Nevada Street Annex
City, State, Zip Code	Oceanside CA 92054
Telephone	760-435-3393
Fax	760-757-9076
Email Address	jlundblad@ci.oceanside.ca.us
Authorized Official (if different from Contact Person)	Peter A. Weiss
Title	City Manager
Address Line 1	300 North Coast Highway
Address Line 2	
City, State, Zip Code	Oceanside CA 92054
Telephone	760-435-3066
Fax	760-435-3078
Email Address	pweiss@ci.oceanside.ca.us
Web Address where this Form is Posted	www.ci.oceanside.ca.us

Amount Grantee is Eligible to Receive*	\$742,791
Amount Grantee is Requesting	\$742,791

*Amounts are available at <http://www.hud.gov/recovery/homelesspreventrecov.xls>

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

B. Citizen Participation and Public Comment

1. Briefly describe how the grantee followed its citizen participation plan regarding this proposed substantial amendment (limit 250 words).

The City will present the draft substantial amendment to the Housing Commission, a citizen advisory body that reviews all housing and homeless programs, on April 28, 2009. The meeting is open to the public and members of the public have access to the draft amendment prior to the meeting. The draft amendment with any changes approved at the Housing Commission will be presented to the Oceanside City Council on May 6, 2009, at a public hearing. Public notice announcing the Housing Commission meeting and City Council public hearing will be published in a newspaper of general circulation on April 22nd and 26th, to meet the HUD twelve-day announcement requirement and the City's ten-day requirement for all public hearings.

The draft substantial amendment was placed on the City's website on pages devoted to Recovery Act programs and projects at <http://www.ci.oceanside.ca.us/recoveryact/>; the HPRP page included information on how members of the public could comment on the amendment. Copies of the draft amendment were available at the Oceanside Housing Authority offices. The draft amendment was also distributed for review and comment to local nonprofit agencies that provide services to needy families and to McKinney-Vento staff persons at the local school districts.

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:

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.

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

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: The City of Oceanside plans to manage the program in-house using existing Housing Authority staff. The City will work with local social service agencies and will refer assisted households to these agencies for specific services, such as providing family financial management training

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

The City will use HPRP funds primarily to prevent households from becoming homeless and to help them return to stability. The City of Oceanside is a Housing Authority for a Section 8 Housing Choice Voucher Program and is experienced in providing housing services. The City has staff members that are capable of evaluating potential HPRP participants and assessing their needs. The City has existing positive relations with local nonprofit social service agencies, the North County Coastal Regional Center of the San Diego County Health and Human Services Agency, and the McKinney-Vento persons at local school districts. The City will utilize these contacts to develop initial points of entry to the HPRP for needy households.

The City will work with local nonprofit social service agencies and County welfare offices to provide additional services, with the City providing overall case management. The HPRP staff person in the City will refer households to these agencies when appropriate for services that the City cannot provide, such family financial planning; the City's role will be to ensure that households have and maintain stable housing. These agencies will work with participating households to develop long-term family stability plans. The City is also working with other HPRP recipient jurisdictions in San Diego County to ensure a consistency of activities and practices across the county. The recipient jurisdictions are planning for joint evaluation and data management through the Regional Task Force on the Homeless.

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).

Once the substantial amendment has been approved by the City Council and submitted to HUD, the City will assign program staff to the HPRP. Any program agreements including MOUs with local school districts will be presented to the City Council for approval no later than August 12, 2009. Program staff at the City will have all program material – application forms, assessment forms, participant agreements, etc. - ready for use no later than September 1. The City will start recording HPRP costs as of July 1 for subsequent billing to the program. The Council will be asked to accept the grant funds and adopt a local HPRP budget as soon as the City receives the grant agreement; the City anticipates having all program components in place by September 15. Since the City will

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

manage the program directly, The City can begin assisting households as soon as HUD signs the grant agreement.

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).

The City will assign a Housing Program Manager to oversee HPRP in Oceanside. The City will work with McKinney-Vento staff persons at the school districts, staff at the County Health and Human Services Agency and welfare offices, and staff at local homeless-serving organizations to do brief assessments of households for referrals to the City's HPRP staff, and to provide other services.

The City will initially target households referred from the school districts to ensure that children remain in their school of origin and maintain a stable home environment. The McKinney-Vento persons at each of the local school districts will train teachers and site staff at local schools to help them identify students who are or may be at risk of homelessness because of the current economic crisis. Parents of the student will be encouraged to contact the McKinney-Vento person at the District office, who will do a brief assessment and refer to the City HPRP person for housing assistance. The City and school districts will remain in contact concerning assisted families throughout their period of HPRP assistance to ensure that households are receiving the assistance that they need and that they are following up on referrals for other assistance.

The City HPRP person will assess each household applying for assistance in order to establish what the household needs toward the goal of ensuring stability in housing. This can include rental assistance payments, payments of arrearages on utilities or rent, or security deposits. The amount of assistance will vary depending on the needs of the household and financial resources available to them; the City will set a maximum on how much any one household can receive. The City will explore with HUD the possibility of issuing some assistance in the form of zero percent interest loans to develop a revolving loan fund; loans would only be repaid when the household has regained employment and financial stability.

The City will maintain records of each HPRP applicant, including initial application, assessment form and determination of need, the type and amount of financial services provided, referrals for other services, and any other data needed to substantiate use of the HPRP funds. Time spent by the HPRP staff person with each applicant will be included in the file to support program delivery expenditures.

The Housing Program Manager will review HPRP files to ensure that program regulations are being followed, the Recovery Act transparency requirements are satisfied, and to make program adjustments. The City will make payments directly to property owners or managers and utility companies to ensure that funds are spent properly. The Financial Services Department will track HPRP funds in an account identified as Recovery Act funding to ensure accountability to Recovery Act guidelines and regulations.

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

Recipient households will provide monthly written follow-up reports. Extension of financial support beyond the initial three-month period will require a review of financial need, activity of adults in the household to find employment or to increase household income, and other factors.

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).

The City has longstanding and positive relationships with government agencies and local nonprofit organizations that will receive funds under the Recovery Act of 2009. The City will work with SER/Jobs for Progress to place youth ages 14-24 in summer jobs with funds provided through the Workforce Investment Act. The City is working with the Oceanside Unified and Vista Unified School Districts, both of which serve students in Oceanside, to support McKinney-Vento services for students that could also be assisted with HPRP funds. The City works with senior-serving organizations that may receive senior nutrition and/or senior workforce community service funding under the Recovery Act. Vista Community Clinic and North County Health Services both received Health Center Recovery Act funding; the City will work with households receiving HPRP assistance to ensure that households have a medical home at one of these clinics and that children are enrolled in CHIP services.

The City has positive experience in developing and maintaining collaborative programs and partnerships with local agencies. The City will bring together representatives from each of the agencies and organizations that provide services to needy households, including the County Health and Human Services, Community Service Block Grant recipients, social service agencies, etc., before September 1. The City will present the HPRP plan to ensure that everyone has an understanding of what HPRP can do and how best to make referrals of households for HPRP assistance. The City is committed to a “wrap-around” approach for assisted households.

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

The City is an active participant in the regional Continuum of Care Committee. Jurisdictions and other members of the Continuum of Care Committee and the Regional Task Force on the Homeless began meeting in early March to develop plans for a regional HPRP approach. The six jurisdictions in San Diego County that are direct recipients of HPRP funds began meeting in early April to share program ideas and to develop a regional approach to evaluation and data management. The City of Oceanside will partner with these other local participating jurisdictions to release a competitive RFP for consulting services related to outcome and evaluation planning. Participating

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

jurisdictions will form a Regional Homeless Prevention Fund Collaborative (RHPFC) for purposes of issuing an RFP for Evaluation Services, selecting a sub-contractor and monitoring the contract.

The City will continue to work with the Continuum of Care and partner agencies to ensure that HPRP housing services are connected with all other services that are available for households, whether homeless or at risk of homelessness. Assessment of households for HPRP assistance will include consideration of whether the household is best served with HPRP resources or if another CofC agency would be more appropriate, as, for example, a household made homeless because of domestic violence. The City understands its role as primarily being that of providing housing assistance with HPRP funds, and will work with local and regional agencies for social, health, mental health and other services that will benefit the assisted household.

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).

The City of Oceanside 2005-2010 Consolidated Plan includes this objective: "Prevent homelessness through short-term rent and utility assistance programs and other services" and is defined as follows:

"One approach to preventing homelessness is to provide short-term assistance for rent, security deposits, and/or utility payments. This has been shown to be one of the most effective ways of preventing homelessness, especially for families. Emergency assistance can also be combined with family financial education on budgeting, proper use of credit and a family savings program."

Local guidelines for HPRP funds will have these priorities of use, which are consistent with the (above) objective in the Consolidated Plan:

1st Short-term rental and/or utility payment assistance and payment of arrearages to prevent households from becoming homeless;

2nd Payment of security and other deposits for households made homeless due to economic conditions and who would remain homeless but for this assistance;

3rd Referrals to agencies for services so that the household can develop long-term stability and security.

HPRP assistance will not go to households considered chronically homeless or to households that demonstrate unwillingness to accept services necessary to develop stability and security. Assisted households will be expected to be active in seeking employment and/or participating in job-training programs.

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.

HPRP Estimated Budget Summary			
	Homelessness Prevention	Rapid Re-housing	Total Amount Budgeted
Financial Assistance ¹	\$400,000	\$150,000	\$550,000
Housing Relocation and Stabilization Services ²	\$75,000	\$43,791	\$118,791
Subtotal (add previous two rows)	\$	\$	\$668,791
Data Collection and Evaluation ³			\$37,000
Administration (up to 5% of allocation)			\$37,000
Total HPRP Amount Budgeted⁴			\$742,791

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.”