

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)

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A. General Information

Grantee Name	Connecticut Department of Social Services
Name of Entity or Department Administering Funds	The Bureau of Aging, Community and Social Work Services
HPRP Contact Person (person to answer questions about this amendment and HPRP)	Pamela A. Giannini, MSW
Title	Director
Address Line 1	25 Sigourney Street
Address Line 2	10 th Floor
City, State, Zip Code	Hartford, CT 06106
Telephone	860-424-5277
Fax	860-424-4886
Email Address	Pamela.Giannini@ct.gov
Authorized Official (if different from Contact Person)	Claudette J. Beaulieu
Title	Deputy Commissioner
Address Line 1	25 Sigourney Street
Address Line 2	10 th Floor
City, State, Zip Code	Hartford, CT 06106
Telephone	860-424-5004
Fax	860-424-4899
Email Address	Claudette.J.Beaulieu@ct.gov
Web Address where this Form is Posted	www.decd.org and www.ct.gov/dss

Amount Grantee is Eligible to Receive*	\$10,818,309.00
Amount Grantee is Requesting	\$10,818,309.00

*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:

DECD is the lead agency for the Consolidated Plan and Citizen Participation Plan process. DSS will administer HPRP funds. Comments received were used in the development of the substantial amendment(s) to the Consolidated Plan 2008 Action Plan for Housing and Community Development. Oral or written comments were invited either through attendance at the public hearings, via e-mail or by submitting directly to DECD. Below activities were followed to ensure citizen participation within the reduced time allocation:

4/2/09 – Legal Notice of hearings published in 7 state newspapers including 1 of minority representation with Spanish version, also posted on DECD’s website, www.decd.org.

4/16/09 – 04/17/09 – 2 Public hearings held to solicit public input in response to funding opportunities contained in Title XII of the American Recovery and Reinvestment Act of 2009 (ARRA) as they apply to federal programs included in the state’s 2005-09 Consolidated Plan.

4/22/09 - Draft HPRP substantial amendment and Legal Notice posted on the DECD website and forwarded to all 169 municipal chief elected officials, regional planning agencies and the state library. Legal Notice of public comment period published in the same manner as previously noted.

5/6/09 – 5/8/09 – 3 Public hearings held to receive comments on the draft HPRP substantial amendment.

4/23/09 – 5/8/09 - Public comment period held.

Refer to Appendix A for copies of Legal Notices.

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

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- 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: The following is a summary of substantive comments received and the comments are organized by Sections in the Substantial Amendment to the Consolidated Plan 2008 Action Plan for the Homelessness Prevention and Rapid Re-housing Program (HPRP). *(Note this section currently includes comments from Public Hearings held on April 16 & 17, comments received during May 6, 7, & 8, 2009 public hearings and 12 day public comment.)*

Dawn Parker, The Connection, Inc.

HPRP:

- She would like to see a central location for information with regard to funding opportunities under HPRP, a more coordinated approach as to what is available within the state , what are key dates, deadlines etc.
- She would like to see that everyone (nonprofit services providers) get equal opportunity for the funding.
- She would recommend that in the implementation of the program we stick to the program guidelines and keep it simple.

DSS Response: DSS can address how it posts and distributes information concerning its HPRP program and process, as the 5 ESG municipalities have their own individual processes in place that might be governed by the Town/City Councils. DSS suggested during the April 22, 2009 HPRP Steering Committee meeting that each HPRP grantee post their RFP on DAS contracting portal, <http://www.das.state.ct.us/Purchase/Portal/Portal Home.asp> as well as Connecticut's recovery website, <http://www.ct.recovery.gov>. Also, DSS strongly concurs that programmatic requirements should not be so stringent that the target population for HPRP services are denied access.

Diane Randall, Partnerships for Strong Communities

HPRP:

She made a strong recommendation to use 100% of the funds for the programs intended purpose and not to supplant existing uses under the program.

DSS response: DSS does not plan to supplant monies away from the HPRP mission. In fact, the Governor's budget includes a revenue-neutral rapid re-housing model, in

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essence holding the beyond shelter program line item harmless. It is DSS's hope that, when the HPRP monies are no longer available, the state will have a system in place that can be sustained within existing resources.

Weatherization Program:

Use funding to preserve single family housing as well as housing developments for low and moderate income persons, serve both.

DECD response: This comment was not accepted because the funding for the Weatherization Program is not an eligible funding source under the Consolidated Plan. However the comment was forwarded to the appropriate staff at the Department of Social Services that is responsible for the Weatherization Program for consideration.

ARRA funds and the Consolidated Plan:

- Nonprofit developers and service providers are looking for clarity and transparency on how this new money (stimulus/ARRA) will mesh with existing programs that are available, what are the possibilities?
- Need to re think the planning for the ConPlan with regard to the new money, tighten up on what gets done- what can be done and what can not, pull together and frame it , give non profits and municipalities a clearer understanding of what the states priorities are and how the department will follow thru with the programs it administers

DECD response: The state is in the initial planning phase of drafting the 2010-2014 Consolidated Plan. The availability of new federal funding and opportunity for additional eligible activities will be considered in the development of the new Consolidated Plan. How the new funding can be meshed with the existing programs will be explored as well as re-examining how all the funding sources can be best used to address the present environment with regard to affordable housing and homelessness in our state. During the planning and citizen participation stage of the drafting of the 2010-2014 ConPlan, outreach will be made to state agencies, municipalities, housing authorities, community foundations, non profit organizations, social service providers, developers and citizens for input regarding needs, coordination of the funding resources, identification of goals and objectives, and evaluation of what the state priorities are and how they can be met

Legal Services Organizations

HPRP:

Connecticut Legal Services, New Haven Legal Assistance Association and Greater Hartford Legal Aid jointly submitted written comments to DSS during the public comment period. The written comments include four points which are as follows:

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- Legal Services are included in the federal guidelines as an appropriate use for HPRP funds, and thus should be explicitly included as part of DSS' Consolidated Action Plan;
- The work of legal services advocates directly focuses on homeless prevention and rapid re-housing;
- Legal services advocates have always worked closely to collaborate with other agencies in the continuum of care; and
- DSS should consider including in the plan the sole-sourcing of a significant portion of the funds for legal services.

DSS response: Based upon the word limitation outlined by HUD in the substantial amendment, all allowable services are not identified; however, legal services is an identified service that is permissible under HPRP in the competitive procurement process, as legal services is essential to prevention and rapid re-housing services. Since legal services already works closely with social services organizations, the concept of collaborating with providers in each of the catchment areas can be better achieved by working directly with those regions based on their specific needs and targets while maximizing HPRP monies for the target population.

David Shumway, American Red Cross Family Shelter, Middletown

HPRP:

Timing is perfect for coordinating with state's Ten Year Plan. Middlesex County had all the pieces, processes in place, just needed funding to address especially the rapid re-housing.

DSS response: DSS is pleased that the concept of homelessness prevention and rapid re-housing is covered in Middlesex County's Ten Year Plan, as homelessness prevention and rapid re-housing are integral components of HPRP.

Neil Brockwehl, CT Legal Services (representing all of state except for Hartford & New Haven)

HPRP:

Legal services has long played an important role in prevention of homelessness, such as locating and identifying funding available to clients such as S.S. and DSS programs. Legal services would like to plan to address their role. The funding sources that normally support Legal Services have become critically low. They would like to qualify as a sole source provider for HPRP services.

DSS response: DSS has only identified 2 entities to provide sole source services utilizing HPRP monies. Both of these entities provide a statewide service that will be uniformly available at a consistent funding level throughout the HPRP program. DSS agrees that legal service advocates play an important role in prevention of homelessness services. Services would be best funded through collaborative efforts within regional catchment

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areas to ensure seamless services for the target population and assure that each region identifies the appropriate mix of services and assistance for their needs.

Michele Conderino, Catholic Charities

HPRP:

- Better define what the five catchment areas are;
- Will the funding be divided up equally amongst the five catchment areas? and
- Reference to a certification by local municipalities being required, what does that entail?

DSS response: The catchment areas identified for HPRP monies are the same catchment areas identified under the Eviction Foreclosure and Prevention Program (EFPP), refer to Appendix D. The funding breakout could be based upon a number of indicators including but not limited to: geographic population count, homeless count during FFY 2008; 2008 Point in Time data; DSS TFA client count for April 2009, Beyond Shelter Program client count for calendar year 2008, etc. Our initial research indicates that, the certification by local municipalities is a standard HUD form that organizations are required to submit with a response to HUD NOFAs. The certification process refers to "Certification of Consistency with the Consolidated Plan." For your ready reference, in Appendix C includes the Consolidated Plan Final Rule language and the "Certificate of Consistency with the Consolidated Plan" form. Certifications are issued by Municipalities and/or the State (DECD) stating that a proposed application being submitted for HUD funding is consistent with an existing Consolidated Plan. It is our belief that only lead agencies will be responsible for the submission of these forms to DSS; however, we have submitted this question to the HPRP helpdesk to confirm our initial research and get a complete response.

Paul Carr, Greater Hartford Community of Promise

HPRP:

Normal services are providing children with a safe place after school. More recently they have been experiencing that some of the children do not have places to live, so they wanted to be able to address that, get more involved.

DSS response: DSS suggests that your agency sign-up to receive RFP announcements issued by the State of Connecticut at http://www.das.state.ct.us/Purchase/Portal/Portal_Home.asp#Bids. By taking this action step, your agency will receive the HPRP announcement and begin the steps to become more involved with addressing the need identified above.

Gary Evans, Co-Opportunity, Inc. (Hartford area as well as state)

HPRP:

Normal service is providing transitional housing that leads to permanent housing -
Questions:

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- What opportunity will be made for partnering on a regional basis?
- Will funding be leveraged on all five catchment areas, as well as region as a whole?

DSS response: DSS would like to strongly encourage collaboration and partnering within a specific catchment area / region. During the Bidder's Conference, time will be set aside for partnering / networking to occur. Also, it is DSS' expectation that organizations will leverage existing resources and utilize HPRP monies to fill in service gaps.

Judy Sklarz, United Way of Coastal Fairfield County

HPRP:

- For the RFP process, applicants will need more time than what was identified in the Sub. Amend. for submitting applications.
- What are the five catchment areas referred to in the substantial amendment?

DSS response: Unfortunately, DSS can not provide more time based upon HUD's HPRP Notice. DSS must have executed contracts in place in order to allocate HPRP funds to subgrantees by September 30, 2009 and the time frame provides the Department with enough to conduct a procurement process, develop and negotiate contracts to meet the required deadline. The catchment areas identified for HPRP monies are the same catchment areas identified under Eviction Foreclosure and Prevention Program (EFPP), refer to Appendix D.

Kathryn M. Crees, The Access Community Action Agency/on behalf of the Windham Tolland Continuum of Care

HPRP:

- In the Draft Plan it is noted that competitive proposals will be requested from 5 catchment areas. The Windham/Tolland Continuum of Care requests that consideration be given when designing these catchment areas to geographic areas with existing continuums and homeless service providers – specifically be creating separate and distinct northeastern and southern catchment areas to ensure and equitable distribution of funds to service providers.
- The Windham/Tolland Continuum also requests that consideration be given to maximizing the impact of these funds by ensuring that state utilizes as much funding as possible to direct service delivery costs and minimize the administrative costs of the state.

DSS response: DSS understands the unique nature of geographic areas and although the competitive process states that there will be 5 catchment areas, more than 1 proposal within a catchment area identifying distinct areas are permissible. For example, in the Eviction Foreclosure Prevention Program, only 5 catchment areas are identified, but within each catchment area, subsets are permissible and lead agencies can subcontract services with subsets within their catchment area. Also, DSS concurs that the vast

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majority of the monies should be identified for the HPRP program. Out of the 5% administrative cap identified in the HPRP guidance, DSS has tentatively identified approximately 2% of HPRP monies for its specific administrative uses and the remaining 3% is identified for providers. The remaining 95% of the HPRP funds are identified for direct services: financial assistance services, housing relocation and stabilization services, data collection and evaluation, per HUD guidance.

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): Sole source services with entities with an expertise in specialized services.

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

Response:

DSS will utilize 2 methods to select subgrantees – competitive procurement and sole source. Competitive procurement will be conducted for HPRP services approximately 84% of total award. DSS is currently in the process of identifying catchment areas for the provision of HPRP services that will ensure collaboration, utilization of existing resources, fill existing service gaps and reduction of duplication of services to the target population. Successful applications will meet DSS' scope of service identified in RFP, experience in providing similar services, demonstrate capacity, compliance with Secretary filing status, and owe no state, federal or local taxes.

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DSS has policies and procedures in place to sole source contracts when entities exist that can provide targeted services that are cost effective, experience in service provision, existing infrastructure/service delivery system, as well as the procurement process would not be cost effective.

DSS has identified two (2) potential providers of such targeted services. Currently DSS contracts with an entity to provide centralized CTHMIS administration including licensing costs, user support, report and data analysis, training & technical assistance. Utilization of this existing provider to assist with HPRP services, data quality and HMIS compliance is cost effective. The second entity has the potential to provide a centralize universal pre-screen tool and referral for statewide functionality for triaging the target population. Both entities offer Connecticut unique services that would enhance/expand their current service delivery systems to our target population. DSS reserves the right to procure or sole source HPRP services depending Connecticut's internal procurement processes.

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:

CT Department of Social Services (DSS) shall issue a Request For Proposals (RFP) for HPRP services targeting no more than five (5) catchment areas to provide services to the target population in a holistic manner. DSS will utilize existing infrastructures to ensure that it completes the competitive procurement process in a short period. DSS expects to issue RFP no later than May 26, 2009. The RFP submission deadline will be approximately 5 weeks after issuance of the RFP. Bidder's conference, question and answer period, logistics and review committee finalization will occur during the time set aside for RFP submission. The Review

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Committee will evaluate and rank proposals that meet CT's contracting minimum requirements, within 2 weeks of receipt of proposals. The Review Committee will provide final recommendations to the DSS Commissioner. Notification that entities have won the right to negotiate with the Department will be issued no later than July 24, 2009. DSS expects to enter into contracts with providers by September 1, 2009 and issue 1st payment to providers no later than September 25, 2009. DSS' experience in competitive procurement, contract development, negotiation and management as well as issuance of payments in a timely manner makes us confident that we will be able to allocate funds to subgrantees by September 30, 2009.

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:

In September 2008, the Connecticut Coalition to End Homelessness (CCEH) approached the CT Department of Social Services (DSS) in conjunction with CT Department of Children and Families (DCF) and CT Department of Economic and Community Development (DECD) to consider an interagency/ revenue neutral approach to address family homelessness. The model is a Rapid Re-housing model. Based upon this activity, Connecticut has already considered Rapid Re-Housing, prevention services, and its impact upon the target population. The following concepts were reviewed: service delivery models, intake and assessments, client flow before and after shelter breach, analysis of CT's Beyond Shelter Programs and Counselor in Shelter programs as rapid re-housing/prevention best practices, review of existing instruments and HMIS reports, and community-based services that can be leveraged for clients.

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DSS' Bureau of Aging, Community and Social Work Services developed a specialized unit entitled, "Housing Team" to target and develop an in-house expertise on DSS housing programs (AIDS Residential, Homeless Shelters, Homeless Outreach/Day program activities, Transitional Living, CT Beyond Shelter, and Counselor in Shelters). This expertise has yielded great results in the past 6 months and the Bureau instituted a designated e-mail address for receipt of housing reports and/or questions, uniform methods to review shelter utilization, contractual requirement for HMIS utilization, etc. This in-house expertise in conjunction with Connecticut Coalition to End Homelessness's (CCEH) training and technical assistance capacity will ensure that DSS' oversight and monitoring is timely and on going. DSS will require HMIS utilization of key HPRP data elements, case management and linkage with existing community based organizations. DSS will also request that CCEH provide it with a quarterly data integrity report during the 1st year of the contract period to monitor system utilization and data quality. Based upon that report DSS/CCEH will provide training and technical assistance as needed. Successful contractors will provide DSS quarterly system generated reports and six month narrative reports that identify successes, barriers, outcomes and measures and need for technical assistance. DSS and CCEH shall issue an annual report, which includes an analysis of the data and provision of services.

In addition to the above, an advisory steering committee entitled "Statewide HPRP Steering Committee" has been convened as a method to obtain statewide commentary from various community partners: legal services, community action agencies, state departments, family service agencies, CT United Way, domestic violence coalition, community partners and ESG municipal grantees. DSS/CCEH will report on activities during the statewide steering committee meeting. DSS will also conduct its standard monitoring visit, review of documentation-programmatic and fiscal in nature, and provision of technical assistance as needed. Payments will be issued to subgrantees, based upon the subgrantee's

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ability to meet contractual obligations and HPRP requirements. It should be noted that DSS will and does have the ability to monitor and visit contractors and subcontractors based upon contractual language.

Finally, DSS and CCEH will convene quarterly meetings for HPRP subgrantees to discuss HPRP expectations, delivered services, problems, best practices, and develop peer-to-peer relationships within the statewide and catchment area.

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:

CT Department of Social Services (DSS) and its local and interagency partners currently have relationships with local agencies that have the ability to serve households that are at-risk of homelessness or are homeless. Based upon DSS' initial review, we have identified approximately ten (10) funding streams associated with the American Recovery and Reinvestment Act of 2009. The funding streams are as follows: (1) Weatherization; (2) Education for Homeless Children and Youth Programs; (3) Emergency Food & Shelter Program; (4) Neighborhood Stabilization Program; (5) Transitional Housing Assistance Grants; (6) Community Services Block Grant; (7) Workforce Investment Act Programs; (8) Temporary Assistance for Needy Families (TANF) Emergency Contingency Fund and (9) Senior Community Service Employment Program –Title V (10) SNAP. The above referenced sources of funding within various communities are delivered by a number of community-based, local and state entities within Connecticut.

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DSS happens to be in the unique situation to have systems in place to leverage these funds for homeless households as well as households that are at-risk of homelessness and link to the appropriate community-based and state level resource. HPRP provides grantees the opportunity to test prevention and rapid re-housing models through its partnerships with community-based organizations, municipalities and interstate relationships. Moreover, through a competitive procurement process, DSS will request that potential subgrantees document how they will leverage and connect the target population with existing resources as well as those currently being funded through the ARRA Act of 2009.

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:

Through its partnership with CCEH, DSS is providing information and resources to all 12 of CT's Continuum of Care and other stakeholder groups regarding the planning processes for HPRP funds and ongoing operation of the HPRP activities. CCEH has already begun a series of in-state teleconferences regarding HPRP and programmatic goals and objectives, has been soliciting feedback and has established a well-publicized information repository on its website, <http://www.cceh.org/esg.htm>, which links to CT's ARRA-HPRP information, technical tools, information on national HPRP technical assistance, regular updates on DSS' HPRP activities, and HPRP Steering Committee minutes. In addition, CCEH and DSS continue to work with our statewide HPRP Steering Committee, which includes representatives from mainstream services providers, government entities and Continuum of Care representatives. CCEH plans to conduct at least one more teleconference or statewide meeting regarding HPRP and has acted as an intermediary between statewide HPRP related efforts and CT's municipal grantees, Continuum of Care and Ten Year Plan communities. CCEH

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has been in communication with chairs of all of CT's Continua on behalf of DSS relating to HPRP efforts, and will continue to solicit input and disseminate information throughout the grant period.

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

Response:

HPRP funds will be used in a manner that is consistent with the state's Consolidated Plan by addressing two objectives of "Goal 7. Homelessness" which are: Expand homeless prevention services, follow-up services and increase transitional services through out the system and Provide rent subsidies to increase housing affordability. DSS through partnerships with other state agencies and community-based non-profits, will carry out the following actions through the provision of financial assistance and housing relocation/stabilization services. DSS will close gaps in existing prevention programs, develop a uniform intake tool, and negotiate with 5 ESG municipalities, (Bridgeport, Hartford, New Britain, New Haven and Waterbury) on HPRP core data elements for HMIS reporting. Participation with statewide HPRP Steering Committee will ensure that DSS and ESG municipalities implement uniform processes wherever possible to streamline provision of services to the target population. DSS will issue regional contracts to providers that require collaboration and partnership with community providers to ensure the elimination of duplication of services, build upon existing resources to triage families and individuals, implement HMIS statewide documentation of outcomes, maximize and expand existing resources and use a results based approach to attacking homelessness.

DSS believes that a number of families and individuals end up in homeless shelters because a financial emergency or short term barrier was not addressed in time to

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maintain the household's current housing situation. CT shall document through HMIS instances of prevention efforts as well as how quickly homeless households are re-housed utilizing HPRP funds and based upon guidance issued by HUD.

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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	\$2,425,200.00	\$3,973,200.00	\$6,398,400.00
Housing Relocation and Stabilization Services ²	\$1,933,915.00	\$1,404,163.00	\$3,338,078.00
Subtotal (add previous two rows)	\$4,359,115.00	\$5,377,363.00	\$9,736,478.00
Data Collection and Evaluation ³			\$ 540,916.00
Administration (up to 5% of allocation)			\$ 540,915.00
Total HPRP Amount Budgeted⁴			\$10,818,309.00

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.

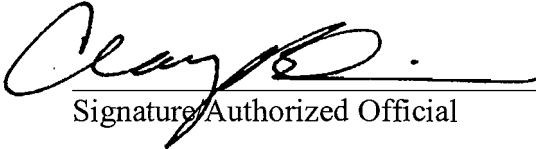
³Data collection and evaluation includes costs associated with operating HUD-approved homeless management information systems for purposes of collecting unduplicated counts of homeless persons and analyzing patterns of use of HPRP funds.

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

5/15/09

Date

Deputy Commissioner for Programs

Title

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Appendix A: Legal Notice

**NOTICE OF PUBLIC COMMENT PERIOD
THE STATE OF CONNECTICUT
DEPARTMENT OF ECONOMIC AND COMMUNITY DEVELOPMENT
IS SEEKING PUBLIC COMMENT ON HOUSING AND COMMUNITY DEVELOPMENT NEEDS AS THEY APPLY TO THE SUBSTANTIAL AMENDMENT(S) TO THE CONSOLIDATED PLAN 2008 ACTION PLAN FOR HOUSING AND COMMUNITY DEVELOPMENT UNDER TITLE XII OF THE AMERICAN RECOVERY AND REINVESTMENT ACT OF 2009 (ARRA)**

Public hearings on housing and community development needs in Connecticut's communities will be held to solicit input in response to funding opportunities contained in Title XII of the American Recovery and Reinvestment Act of 2009 (ARRA) as they apply to the federal programs included in the state's 2005-09 Consolidated Plan (ConPlan) and a revision to the state's Citizen Participation Plan pursuant to 24 CFR Part 91 Sec. 91.115. Comments received will be used in the development of the state's draft Substantial Amendment(s) to the Consolidated Plan 2008 Action Plan for Housing and Community Development. The hearings will be held at the following times and locations:

Rocky Hill
2:00 p.m.
April 16, 2009
CERC
Meeting Room
805 Brook Street, Bldg. 4
Rocky Hill, Connecticut

Hamden
2:00 p.m.
April 17, 2009
Hamden Gov. Center
Town Attorney Conference Room
2750 Dixwell Avenue
Hamden, Connecticut

All state residents are urged to attend the public hearings and provide oral or written comments. A copy of the ARRA can be found at <http://www.hud.gov/recovery/>. Copies of the 2008 Action Plan and the state's 5 year Consolidated Plan are available at the Department of Economic & Community Development's web site, www.decd.org and also at the State Library.

Written comments may be sent to W. Michael Regan, Community Development Assistant Administrator, Office of Strategy and Policy, Department of Economic & Community Development, 505 Hudson Street, Hartford, CT 06106-7106 or email to ARRA.comments@ct.gov. All comments received will be addressed in the Citizen Participation and Public Commentary Section of the Substantial Amendment(s) to the Consolidated Plan 2008 Action Plan for Housing and Community Development.

Department of Economic & Community Development programs are administered in a nondiscriminatory manner, consistent with equal employment opportunities, affirmative action, and fair housing requirements. Questions, concerns, complaints or requests for information in alternative formats must be directed to the ADA (504) Coordinator at 860-566-1755. Locations for the public hearings are accessible to people with disabilities.

Distribution Date: April 2, 2009

AVISO DE COMENTARIOS PÚBLICOS

EL DEPARTAMENTO ECONÓMICO Y DE DESARROLLO COMUNITARIO DEL ESTADO DE CONNECTICUT ESTÁ SOLICITANDO COMENTARIOS PÚBLICOS SOBRE LAS NECESIDADES DE VIVIENDA Y DESARROLLO COMUNITARIO, QUE SON PARTE DE LAS SUSTANCIALES ENMIENDAS AL PLAN CONSOLIDADO DE ACCIÓN 2008 PARA VIVIENDAS Y DESARROLLO COMUNITARIO, BAJO EL TÍTULO XII DEL ACTA DEL 2009 SOBRE LA RECUPERACIÓN Y REINVERSIÓN NORTEAMERICANA (ARRA).

Se celebrarán audiencias públicas acerca de las necesidades de vivienda y desarrollo comunitario en comunidades de Connecticut. Las mismas tienen como propósito solicitar aportes en datos, en respuesta a oportunidades de financiamiento tal como contenidas en el Título XII del Acta del 2009 sobre la Recuperación y Reinversión Norteamericana (ARRA), en la medida en que se aplican a los programas federales incluidos en el Plan consolidado estatal (ConPlan) 2005-09. Igualmente una revisión al Plan de participación ciudadana según lo acordado en el 24 CFR, Parte 91, Sección 91.115. Los comentarios recibidos serán utilizados para elaborar el borrador estatal de Enmiendas sustanciales al Plan consolidado de acción 2008 para viviendas y desarrollo comunitario. Las audiencias tendrán lugar en las fechas y lugares siguientes:

Rocky Hill	Hamden
2:00 pm	2:00 pm
16 de abril, 2009	17 de abril, 2009
CERC	Hamden Gov. Center
Meeting Room	Town Attorney Conference Room
805 Brook St., Edificio 4	2750 Dixwell Avenue
Rocky Hill, Connecticut	Hamden, Connecticut

Se invita a todos los residentes del Estado a estas audiencias públicas y de presentar comentarios escritos u orales. Se puede obtener una copia del ARRA en <http://www.hud.gov/recovery/>. Copias del Plan de Acción 2008 y del Plan consolidado están disponibles en el sitio de Internet del Departamento Económico y Desarrollo Comunitario, www.decd.org y también en la biblioteca estatal.

Los comentarios escritos pueden ser enviados a W. Michael Regan, Administrador asistente de Desarrollo comunitario, Oficina de Estrategia y Política, Departamento Económico y de Desarrollo Comunitario, 555 Hudson St., Hartford, CT 06106-7106 o por e-mail a ARRA.comments@ct.gov. Todos los comentarios recibidos serán respondidos en la sección de Participación ciudadana y comentarios públicos de las Enmiendas sustanciales del Plan consolidado de Acción 2008 para Viviendas y desarrollo comunitario.

Los programas del Departamento Económico y de Desarrollo Comunitario son administrados de manera no discriminadora, consistente con los principios de oportunidades iguales para el empleo, acción afirmativa y exigencias apropiadas para la vivienda. Preguntas, preocupaciones, quejas o solicitudes de información en formatos alternativos deben ser hechas al Coordinador de ADA (504), teléfono 860-566-1755. Los locales donde tendrán lugar las audiencias son accesibles a personas con discapacidades.

Fecha de distribución: 2 de abril, 2009

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

NOTICE OF PUBLIC COMMENT PERIOD
THE STATE OF CONNECTICUT

DEPARTMENT OF ECONOMIC AND COMMUNITY DEVELOPMENT
IS SEEKING PUBLIC COMMENT ON THE STATE'S DRAFT
SUBSTANTIAL AMENDMENT TO THE CONSOLIDATED PLAN 2008 ACTION PLAN FOR THE
HOMELESSNESS PREVENTION AND RAPID RE-HOUSING PROGRAM (HPRP)

The public comment period will begin April 23, 2009 and end May 8, 2009 at the close of business. Public Hearings on the state's draft Substantial Amendment to the Consolidated Plan 2008 Action Plan for the Homelessness Prevention and Rapid Re-Housing Program (HPRP) will be held in locations and times as listed below. The state's draft HPRP Substantial Amendment is for the utilization of approximately \$10,818,309 of funding under Title XII of the American Recovery and Reinvestment Act of 2009 (ARRA). A copy of ARRA can be found at <http://www.hud.gov/recovery/>. The purpose of the HPRP funding is to provide financial assistance and services to either prevent individuals and families from becoming homeless or help those who are experiencing homelessness to be quickly re-housed and stabilized. The state's HPRP funds will be administered by the Department of Social Services.

Rocky Hill

2:00 p.m.
May 6, 2009
CERC
Meeting Room
805 Brook Street, Bldg. 4
Rocky Hill, Connecticut

Hamden

10:00 a.m.
May 7, 2009
Hamden Gov. Center
3rd Floor Conference Room
2750 Dixwell Avenue
Hamden, Connecticut

Coventry

10:00 a.m.
May 8, 2009
Coventry Town Annex
1712 Main Street (Route 31)
Coventry, Connecticut

All interested parties are encouraged to participate by reviewing and providing oral or written comment on the state's draft HPRP Substantial Amendment. A copy of the state's draft HPRP Substantial Amendment as well as the state's five-year Consolidated Plan for Housing and Community Development and the annual Action Plans are available at the Department of Economic and Community Development's website, www.DECD.org. The Department of Economic and Community Development acts as the lead for the state's Consolidated Plan and annual Action Plans.

Written comments may be sent to W. Michael Regan, Community Development Assistant Administrator, Office of Strategy and Policy, Department of Economic & Community Development, 505 Hudson Street, Hartford, CT 06106-7106 or emailed to ARRA.comments@ct.gov. All comments received will be addressed in the Citizen Participation and Public Comment Section of the HPRP Substantial Amendment.

Departments of Social Services and Economic & Community Development programs are administered in a nondiscriminatory manner, consistent with equal employment opportunities, affirmative action, and fair housing requirements. Questions, concerns, complaints or requests for information in alternative formats must be directed to the ADA (504) Coordinator at 860-566-1755. Locations for Public Hearings are accessible to people with disabilities.

Publication Date: April 22, 2009

AVISO DE COMENTARIOS PÚBLICOS

THE STATE OF CONNECTICUT DEPARTMENT OF ECONOMIC AND COMMUNITY DEVELOPMENT

ESTÁ SOLICITANDO COMENTARIOS PÚBLICOS PARA EL BORRADOR DE LAS SUSTANCIALES ENMIENDAS AL PLAN CONSOLIDADO DE ACCIÓN 2008 DEL PLAN DE VIVIENDAS BAJO EL PROGRAMA DE PREVENCIÓN DE LA CARENCIA DE HOGARES Y DOTAR RÁPIDAMENTE DE VIVIENDAS A PERSONAS AFECTADAS (HPRP).

El período de comentarios públicos comenzará el 23 de abril de 2009 y terminará el 8 de mayo de 2009 a la hora de cierre de las oficinas. Se celebrarán audiencias públicas para el borrador de las sustanciales enmiendas al plan consolidado de acción 2008 del plan de viviendas bajo el programa de prevención de la carencia de hogares y para dotar rápidamente de viviendas a las personas afectadas (HPRP) en las fechas y lugares siguientes. El borrador de de las sustanciales enmiendas es para la utilización de aproximadamente \$10, 818,309 provenientes del Título XII del Acta del 2009 sobre la Recuperación y Reinversión Norteamericana (ARRA). Se puede obtener una copia del ARRA en el sitio <http://www.hud.gov/recovery/>. El propósito del financiamiento HPRP es de proveer asistencia financiera y servicios para prevenir que personas queden en la situación de quedarse sin un hogar o de ayudar a estabilizarse o a conseguir una vivienda quienes se ven en esa situación. Los fondos estatales del HPRO serán administrados por el Departamento de Servicios Sociales.

Rocky Hill
2:00 p.m.
6 de mayo, 2009
CERC
Meeting Room
805 Brook Street, Bldg. 4
Rocky Hill, Connecticut

Hamden
10:00 a.m.
7 de mayo, 2009
Hamden Gov. Center
3rd Floor Conference Room
2750 Dixwell Avenue
Hamden, Connecticut

Coventry
10:00 a.m.
8 de mayo, 2009
Coventry Town Annex
1712 Main Street (Route 31)
Coventry, Connecticut

Se invita a todas las partes interesadas a revisar y a presentar comentarios escritos u orales sobre el borrador de las sustanciales enmiendas al HPRP. Se puede obtener una copia del borrador de las sustanciales enmiendas al HPRP, así como del Plan Consolidado para Viviendas y Desarrollo Comunitario de cinco años y del Plan de Acción anual, en el sitio del Departamento Económico y de Desarrollo Comunitario: www.DECD.org. El Departamento Económico y Desarrollo Comunitario está al frente del Plan Consolidado y del Plan de Acción anual.

Los comentarios escritos pueden ser enviados a W. Michael Regan, Administrador asistente de Desarrollo comunitario, Oficina de Estrategia y Política, Departamento Económico y de Desarrollo Comunitario, 505 Hudson St., Hartford, CT 06106-7106 o por e-mail a ARRA.comments@ct.gov. Todos los comentarios recibidos serán respondidos en la sección de Participación ciudadana y comentarios públicos de las Enmiendas sustanciales del HPRP.

Los programas del Departamento Económico y de Desarrollo Comunitario son administrados de manera no discriminatoria, consistente con los principios de oportunidades iguales para el empleo, acción afirmativa y exigencias apropiadas para la vivienda. Preguntas, preocupaciones, quejas o solicitudes de información en formatos alternativos deben ser hechas al Coordinador de ADA (504), teléfono 860-566-1755. Los locales donde tendrán lugar las audiencias son accesibles a personas con discapacidades.

Fecha de publicación: 22 de abril, 2009

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

Appendix B: Public Comment

Written transcripts of public hearings held on April 16, April 17, May 6, May 7, and May 8, 2009 are included in Appendix B.

STATE OF CONNECTICUT
DEPARTMENT OF ECONOMIC AND COMMUNITY DEVELOPMENT

* * * * *

IN RE:

APRIL 16, 2009

HOUSING & COMMUNITY
DEVELOPMENT NEEDS

2:05 P.M.

* * * * *

BEFORE: DEBRA LANDRY, CHAIRPERSON

HEARING RE: HOUSING & COMMUNITY DEVELOPMENT NEEDS
APRIL 16, 2009

1 . . . Verbatim proceedings of a hearing
2 before the Department of Economic and Community
3 Development in the matter of Housing & Community
4 Development Needs, held on April 16, 2009 at 2:05 p.m. at
5 805 Brook Street, Rocky Hill, Connecticut, at which time
6 the parties were represented as hereinbefore set forth. .
7 . . .

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11 CHAIRPERSON DEBRA LANDRY: Today is April
12 16, 2009, and it's 2:00 p.m., 2:05 p.m., and I am Debra
13 Landry from the Department of Economic and Community
14 Development.

15 I'm here to receive public comment and
16 response to funding opportunities contained in Title XII
17 of the American Recovery and Reinvestment Act of 2009,
18 also known as ARRA, as they apply to the Federal programs
19 included in the State's 2005/2009 Consolidated Plan and a
20 revision to the State's Citizen Participation Plan,
21 pursuant to 24 CFR Part 91 Section 91.115.

22 Please be advised that, as contained in
23 the legal notice, all comments received at this public
24 hearing will be addressed in the citizen participation

HEARING RE: HOUSING & COMMUNITY DEVELOPMENT NEEDS
APRIL 16, 2009

1 and public commentary section of the Substantial
2 Amendments to the Consolidated Plan 2008 Action Plan for
3 Housing and Community Development.

4 Just to be a little bit more specific, the
5 programs included are Emergency Shelter Grant Program,
6 the Housing Opportunities for Persons with AIDS Program,
7 the Home Investment Partnership Program and the Community
8 Development Block Grant for Small Cities Program.

9 To date, approximately 10,018,309 has been
10 identified to be available under the ESG grant, also
11 known as the Housing Prevention and Rapid Re-housing
12 Program.

13 My role here today is to make sure that
14 your comments become part of the public record and that
15 they are addressed in the Substantial Amendments that
16 will be submitted to HUD.

17 I would ask that you start by identifying
18 yourself and who you represent before presenting your
19 comments. There are some people here to provide public
20 comment, so we will start.

21 If you would like to introduce yourself,
22 and who you represent, and provide any comment. I just
23 want you to know I'm not here necessarily to answer
24 questions on the public record, but the comments will go

HEARING RE: HOUSING & COMMUNITY DEVELOPMENT NEEDS
APRIL 16, 2009

1 into record and will be responded to in the Substantial
2 Amendments.

3 MS. DAWN PARKER: Great. Okay, thanks.

4 CHAIRPERSON LANDRY: Yup.

5 MS. PARKER: I'm Dawn Parker, and I'm here
6 on my own, but I work for a non-profit, so I'm taking my
7 opinions from what I see in my non-profit world in
8 Connecticut, and, in particular, this is about the
9 Homeless Prevention and Rapid Re-housing part of the
10 money.

11 CHAIRPERSON LANDRY: Um-hum.

12 MS. PARKER: And I would like to see that
13 there's a more central location for information. There's
14 a lot of -- I know this is for the State, balance of the
15 State money, but there's also RFPs in the different
16 cities, and we're a statewide organization, and we're
17 having a difficult time keeping track of information,
18 deadlines, hearings, discussions, things like that, and
19 we have statewide organizations that might serve as the
20 vehicle for information.

21 They've served a vehicle of information
22 and knowledge and, you know, HUD's interpretation and
23 guidelines and sort of summaries and ideas, but dates are
24 not like being conveyed in one central location, which is

HEARING RE: HOUSING & COMMUNITY DEVELOPMENT NEEDS
APRIL 16, 2009

1 making it difficult for us.

2 And then the other thing I would like to
3 try to make sure is that everybody is able to
4 participate, and that the guidelines put down from HUD I
5 look at them as pretty simplified, and I hope that they
6 stay simplified in order to have as many people be able
7 to access the funds for their organizations and to help
8 out different people across the state.

9 Those are my comments. Keep it simple,
10 and try to let the dates be known for people, so that
11 they don't miss opportunities.

12 CHAIRPERSON LANDRY: All set?

13 MS. PARKER: Yes.

14 CHAIRPERSON LANDRY: Thank you very much
15 for providing public comment. Is there anyone else here
16 that would like to provide public comment at this time?

17 MS. DIANE RANDALL: Do you want me to go
18 ahead?

19 CHAIRPERSON LANDRY: Sure.

20 MS. RANDALL: I'm Diane Randall. I'm the
21 Director of the Partnership for Strong Communities, and I
22 want to thank you for having public comment on the ARRA
23 money and how it will impact the Consolidated Plan.

24 I would say a couple of things. One is

HEARING RE: HOUSING & COMMUNITY DEVELOPMENT NEEDS
APRIL 16, 2009

1 that I think, in particular, with the money, the
2 emergency shelter grant money that's going to be used for
3 Rapid Re-housing and Homelessness Prevention it's a
4 wonderful opportunity for us to I think make some very
5 positive inroads in addressing homelessness and helping,
6 assisting families and individuals get out of shelters.

7 I would very strongly recommend that the
8 Department and that the State use 100 percent of the new
9 Federal stimulus money for that purpose and not supplant.

10 I know that early on there was some
11 conversation, because this money wasn't required to not
12 do that, that there was some question about whether it
13 would supplant some of the existing uses already. While
14 I think given the potential growth in the numbers of
15 families in need and facing homelessness, that it's
16 really critical that we use 100 percent of the new money
17 for that purpose.

18 I think the other, the specific pot I want
19 to address is the weatherization money and the obvious
20 opportunities that are created with the significant
21 increase in new funding for weatherization.

22 That money has been used in a very small
23 way for a very important purpose, which is to help, I
24 think primarily help households, who own their homes, who

HEARING RE: HOUSING & COMMUNITY DEVELOPMENT NEEDS
APRIL 16, 2009

1 are at a certain income level be able to maintain those
2 homes and provide the necessarily repairs that provide
3 better energy efficiency, which I think is absolutely
4 part of what needs to be done, particularly within our
5 center cities, where we have a lower-income population,
6 who may own their homes and may not be able to maintain
7 them. I think it's very critical that at least a portion
8 of the money be used for that.

9 I would like to also encourage the State,
10 though, to consider whether some of this money can be
11 used, and I don't know all the guidelines, but can be
12 used to address the preservation needs of other forms of
13 housing, in addition to single-family homeownership.

14 Significantly, we have a number of
15 affordable housing developments that are serving a lower-
16 income population that need modifications that will help
17 make those developments much more energy efficient, much
18 more safe for the residents who live there, and whether
19 this money might be able to be invested in some of those
20 properties in a way that sustains the properties,
21 themselves, provides better quality of life for the
22 tenants and, in fact, does it in a green way that is I
23 think serving the broader purposes of the ARRA
24 legislation to basically create more sustainable

HEARING RE: HOUSING & COMMUNITY DEVELOPMENT NEEDS
APRIL 16, 2009

1 communities, as well, so I think it's very important that
2 that use of the weatherization money be weighed carefully
3 to serve both homeowners and renters.

4 In regard to how this impacts the
5 Consolidated Plan, I think that one of the critical needs
6 that we hear as an advocacy and policy organization is
7 what was reflected in the earlier comment, which is a
8 need for clarity, what I would call broadly clarity and
9 transparency.

10 We've been participating in forums
11 throughout the State this week that the community
12 foundations have done, and the non-profit organizations
13 that are delivering services on behalf of the State, in
14 particular addressing homelessness and housing, are just
15 looking for information at the very basic and need
16 clarity about what is happening, what the time frames
17 are, what the opportunities are.

18 And I think the other part of it is to
19 understand how this new money will mesh with existing
20 resources that are currently available. For example, the
21 new Neighborhood Stabilization Program. How does this
22 money mesh with that? But, also, longstanding programs
23 that DECD or DSS or others operate to understand how
24 these programs can fit and what the possibilities are I

HEARING RE: HOUSING & COMMUNITY DEVELOPMENT NEEDS
APRIL 16, 2009

1 think are really important.

2 I think the other element that is striking
3 about this new resource and how it fits with the
4 Consolidated Plan is that I think it will require, as to
5 really rethink the planning for how we're going to
6 address the issues of housing and homelessness in our
7 state.

8 Clearly, I think both the non-profit
9 community that are delivering these services and the
10 State will increasingly be looking to how the Federal
11 response can assist us, and, so, I think, and I
12 understand that the amendments to this plan are probably
13 very specific to this set of money, but as we look
14 forward to the next phase of planning, I think it's going
15 to be really critical to reassess and perhaps tighten up
16 how we prioritize, what gets done in the State, what can
17 be done, and to be honest and clear about what can't be
18 done.

19 You know, there's a lot of ingenuity in
20 our State and a lot of opportunity, and, so, I think the
21 Department's ability to pull that together and to frame
22 it in a way that gives those organizations, whether
23 municipalities, or housing authorities, or anyone else
24 who wanted to address housing needs for people who are

HEARING RE: HOUSING & COMMUNITY DEVELOPMENT NEEDS
APRIL 16, 2009

1 very low income, as well as in some cases service needs,
2 and they want to do it from both the perspective that
3 addresses tenants, as well as neighborhoods, that they
4 have a clear understanding of what the State's priorities
5 are and, also, how the DECD is working in conjunction
6 with other State agencies and with HUD on these
7 priorities.

8 I think, again, just the greatest amount
9 of clarity and transparency will serve our entire State
10 the best. That's my comment.

11 CHAIRPERSON LANDRY: All set? Okay. As
12 there are no other members of the public currently
13 present, we would like to recess until such time as
14 additional persons may appear. Thank you.

15 (Off the record)

16 CHAIRPERSON LANDRY: Since no other member
17 of the public has appeared to provide comment, we will
18 close this hearing at 3:05 p.m.

19 (Whereupon, the hearing adjourned at 3:05
20 p.m.)

STATE OF CONNECTICUT
DEPARTMENT OF ECONOMIC AND COMMUNITY DEVELOPMENT

* * * * *

IN RE: APRIL 17, 2009
HOUSING & COMMUNITY 2:00 P.M.
DEVELOPMENT NEEDS

* * * * *

BEFORE: RICK ROBBINS, CHAIRPERSON

HEARING RE: HOUSING & COMMUNITY DEVELOPMENT NEEDS
APRIL 16, 2009

1 . . .Verbatim proceedings of a hearing
2 before the Department of Economic and Community
3 Development in the matter of Housing & Community
4 Development Needs, held on April 17, 2009 at 2:00 p.m. at
5 2750 Dixwell Avenue, Hamden, Connecticut, at which time
6 the parties were represented as hereinbefore set forth. .
7 . .

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11 CHAIRPERSON RICK ROBBINS: Today is April
12 17, 2009, and it's 2:00. I'm Rick Robbins of the
13 Connecticut Department of Economic and Community
14 Development, and I'm here to receive public comment and
15 response to funding opportunities contained in Title XII
16 of the American Recovery and Reinvestment Act of 2009 as
17 they apply to the Federal programs included in the
18 State's 2005 to 2009 Consolidated Plan and a revision to
19 the State's Citizen Participation Plan, pursuant to 24
20 CFR Part 91 Section 91.115.

21 Please be advised, as contained in the
22 legal notice, all comments received at this public
23 hearing will be addressed in the citizen participation
24 and public commentary section of the Substantial

HEARING RE: HOUSING & COMMUNITY DEVELOPMENT NEEDS
APRIL 16, 2009

1 Amendment to the Consolidated Plan 2008 Action Plan for
2 Housing and Community Development.

3 My role here today is to make sure that
4 your comments become part of the public record and that
5 they are addressed in the Substantial Amendment.

6 I would ask that you start by identifying
7 yourself and who you represent before presenting your
8 comments. As no member of the public is currently
9 present to provide comment, we will recess until such
10 time as someone appears to do so.

11 (Off the record)

12 CHAIRPERSON ROBBINS: Okay. Since no
13 member of the public has appeared to provide comment, we
14 will close this hearing at 3:25 on the 17th of April.
15 Thank you.

16 (Whereupon, the hearing adjourned at 3:25
17 p.m.)

**Comments from Legal Services Organizations on
Connecticut's Substantial Amendment to the Consolidated Plan 2008 Action Plan
for the Homelessness Prevention and Rapid Re-Housing Program (HPRP)**

May 4, 2009

Connecticut Legal Services, New Haven Legal Assistance Association, and Greater Hartford Legal Aid jointly submit these comments regarding Connecticut's Amended Consolidated Plan for HPRP. These three agencies together provide urgently-needed legal services to low income clients in crisis throughout the entire state.

We write to ask the Department of Social Services to amend its Consolidated Plan to explicitly include the provision of legal services as a critical element of homelessness prevention and rapid re-housing.

Legal Services are included in the federal guidelines as an appropriate use for HPRP funds, and thus should be explicitly included as part of DSS's Consolidated Action Plan.

HUD's guidelines for eligible activities state: "HPRP funds may be used for legal services to help people stay in their homes, such as services or activities provided by a lawyer or other person(s) under the supervision of a lawyer to assist program participants with legal advice and representation in administrative or court proceedings related to tenant/landlord matters or housing issues. Legal services related to mortgages are not eligible." Thus, legal services, particularly for homelessness prevention, are an appropriate activity to explicitly include in the State's Consolidated Plan.

The work of legal services advocates directly focuses on homeless prevention and rapid re-housing.

DSS's Consolidated Action Plan states: "DSS believes that a number of families and individuals end up in homeless shelters because a financial emergency or short term barrier was not addressed in time to maintain the household's current housing situation." (p.12). Legal services representation is aimed at addressing exactly these kinds of barriers and emergencies, to prevent a family or individual from becoming homeless, or enable them to be quickly re-housed. For example:

- Legal services attorneys represent tenants to prevent them from being evicted, or secure them enough time, in an eviction case, to find alternative housing. Such representation often includes helping them obtain the supports and services they need to ensure the future preservation of housing stability, such as mental health treatment, a representative payee to ensure timely rent payments, housekeeping services etc. For tenants hit hard by the economic downturn, such as those who recently lost a job, representation by legal services advocates can help tide them over and keep them in their housing until gain a new income source, whether through a new job, unemployment compensation, or public assistance.

- Legal services advocates represent tenants seeking to keep the housing subsidy that makes their housing affordable so that they will not be evicted and become homeless, when an administrative agency has proposed to terminate this essential subsidy. We also help clients who are homeless get re-instated in, or admitted to the Section 8, RAP or public housing programs – assistance that is a key to their successful rapid re-housing.
- Legal services advocates represent clients to help them obtain or keep income from public sources, such as TANF, SAGA, Social Security, or Unemployment Compensation. Maintaining a reliable income source is also a key element in preventing homelessness, and is particularly important as employment opportunities for low-income people are impacted by these difficult economic times.
- Legal services advocates represent clients in situations involving domestic violence. Helping a domestic violence victim obtain (and then enforce) a restraining order is key to helping her safely stay in her housing, or obtain rapid re-housing if she has been forced to move to a domestic violence shelter. Representing her in a divorce and helping her gain regular child support can also be crucial to the financial stability needed for either homelessness prevention or rapid re-housing.

Thus, the Plan should be amended to explicitly recognize and include the direct provision of legal services as part of the State's efforts at both Homelessness Prevention and Rapid Re-Housing.

Legal services advocates already closely collaborate with other agencies in the continuum of care.

Legal services advocates have always worked closely with the social services programs in our communities. We receive referrals on a daily basis from social services providers, whether it is the victim advocate in the court calling to ask what her client should do with the eviction papers she just received, or the shelter counselor asking how to get her client back on the Section 8 program. We also regularly refer our clients to other agencies for the expertise that they can offer, from domestic violence support groups for women in violent situations, to clients needing mental health treatment in order to work out their relationships with their neighbors so they can maintain their housing. The HPRP seeks programs that work as part of a network with other community organizations to respond to clients' needs. The Connecticut legal services programs are already working in close collaboration with other organizations within the continuum of care.

DSS Should Consider Including in the Plan the Sole-Sourcing of a Significant Portion of the Funds for Legal Services

The current Plan states: "DSS has policies and procedures in place to sole source contracts when entities exist that can provide targeted services that are cost effective,

experience in service provision, existing infrastructure/service delivery system, as well as the procurement process would not be cost effective.”

The three legal services field programs would be appropriate for sole source contracts, because they can provide targeted, cost effective services through an existing delivery system; and there are no other organizations in the state that provide high-volume in-person legal services to low income people and that have the legal expertise in the broad areas of homelessness prevention and rapid re-housing outlined above. Thus, while grants for legal services could be awarded through the competitive process, DSS could also appropriately decide to streamline the process through use of a sole source contract.

STATE OF CONNECTICUT
DEPARTMENT OF ECONOMIC AND COMMUNITY DEVELOPMENT

* * * * *

IN RE:

MAY 6, 2009

2008 ACTION PLAN FOR THE
HOMELESSNESS PREVENTION AND
RAPID RE-HOUSING PROGRAM

2:00 P.M.

* * * * *

BEFORE: DEBRA LANDRY, CHAIRPERSON

RE: 2008 ACTION PLAN FOR HOMELESSNESS PREVENTION (HPRP)
MAY 6, 2009

1 . . .Verbatim proceedings of a
2 hearing before the Department of Economic and Community
3 Development in the matter of the 2008 Action Plan for the
4 Homelessness Prevention and Rapid Re-Housing Program,
5 held on May 6, 2009 at 2:00 p.m. at 805 Brook Street,
6 Rocky Hill, Connecticut, at which time the parties were
7 represented as hereinbefore set forth. . . .

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10

11

CHAIRPERSON DEBRA LANDRY: Today is May 6,
12 2009, and it's 2:00 p.m. I am Debra Landry of the
13 Department of Economic and Community Development, and I'm
14 here to receive public comment in response to State's
15 Draft Substantial Amendment to the Consolidated Plan,
16 2008 Action Plan for the Housing Prevention and Rapid Re-
17 Housing Program, also known as HPRP.

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The State's Draft HPRP Substantial
Amendment is for the utilization of approximately
\$10,818,309 funding under Title XII of the American
Recovery and Reinvestment Act of 2009, also known as
ARRA, and this is as they apply to the Federal programs
included in the State's 2005/2009 Consolidated Plan.

24

The purpose of the HPRP funding is to

RE: 2008 ACTION PLAN FOR HOMELESSNESS PREVENTION (HPRP)
MAY 6, 2009

1 provide financial assistance and services to either
2 prevent individuals and families from becoming homeless
3 or help those who are experiencing homelessness to be
4 quickly re-housed and stabilized.

5 The State's HPRP funds would be
6 administered by the Department of Social Services and the
7 Department of Economic and Community Development acts as
8 a lead for the State's Consolidated Plan.

9 My role here today is to make sure that
10 your comments become part of the public record and that
11 they are addressed in the Substantial Amendment. I would
12 ask that before you present your comments, you start by
13 identifying yourself. There's also a sign-up sheet here,
14 so we make sure we spell your name correctly, and if you
15 are representing a certain agency or a non-profit, that
16 you identify that, also.

17 So it looks like there's several people
18 here today to provide comment or participate in this
19 public hearing, and I would ask that somebody who would
20 like to start this that they come up to the podium.
21 Anybody interested?

22 MR. DAVID SHUMWAY: My name is David
23 Shumway. I am the Program Director for the American Red
24 Cross, Amity Shelter, Transitional Housing Program and

RE: 2008 ACTION PLAN FOR HOMELESSNESS PREVENTION (HPRP)
MAY 6, 2009

1 Beyond Shelter Program in Middletown, in Middlesex
2 County. I'm also the Chair of the Middlesex County
3 Continuum of Care, which is a group of service providers
4 who are working to end homelessness.

5 My message about the funding opportunity
6 that the Prevention in Rapid Re-Housing Program presents
7 is that the timing is perfect, in light of the work that
8 has been done in so many communities around the state by
9 the 10-year plan groups.

10 In Middlesex County, the 10-year plan has
11 been put together by community leaders, business leaders,
12 social service leaders, religious leaders and other
13 people from the community, and it has created concrete
14 plans that we believe will end homelessness in the next
15 few years.

16 As such, the work that we've done in the
17 10-year plan process has given us an opportunity to
18 create some of the pieces that the Prevention in Rapid
19 Re-Housing Program refer to. I think, again, the timing
20 is absolutely perfect.

21 In Middlesex County, we have established a
22 prevention fund. We have created it. We have a format
23 for it. We have all the pieces in place, except the
24 money, and that's a very, very important part.

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RE: 2008 ACTION PLAN FOR HOMELESSNESS PREVENTION (HPRP)
MAY 6, 2009

1 We also have a Beyond Shelter Program that
2 now works with people who have been in shelters and have
3 gone into housing, and one of the things we anticipate
4 doing in Middlesex County is taking our Beyond Shelter
5 Program and expanding it in a very dramatic way to
6 provide Rapid Re-Housing, so that what will happen with a
7 family that becomes homeless in Middlesex County in the
8 future with the opportunity presented here is that a
9 family that comes to our family shelter, where they might
10 now stay three months, or four months, or five months,
11 will be there one week, two weeks, and we will have a
12 very aggressive process in the community, whereby we will
13 be setting up meetings with landlords and selling
14 landlords on the opportunity that Rapid Re-Housing
15 presents, so that families will be able to go directly in
16 the housing within a week or two of them becoming
17 homeless.

18 Our Rapid Re-Housing group will consist
19 of, also, case managers that will continue to work with
20 people and keep them from becoming homeless again.

21 What I will also tell you is that, as
22 somebody who has worked with people who have become
23 homeless for over 20 years now, this is the first time,
24 absolutely the first time in my life that I really

RE: 2008 ACTION PLAN FOR HOMELESSNESS PREVENTION (HPRP)
MAY 6, 2009

1 honestly believe that we can forever change what becoming
2 homeless is like in our area. Thank you for the
3 opportunity to speak on this issue.

4 CHAIRPERSON LANDRY: Is there anyone else
5 who is ready to provide comment? I can close this for a
6 period of time until you're ready, if that's acceptable
7 to you. Let me know. I'm here for a little bit. Okay.

8 MR. NEIL BROCKWEHL: My name is Neil
9 Brockwehl. I work with Connecticut Legal Services. I'm
10 a Housing Attorney. I spend a lot of my time trying to
11 prevent people from becoming homeless. I didn't have
12 prepared remarks for today, but I just wanted to say
13 something generally.

14 Not only my own program, Connecticut Legal
15 Services -- Connecticut Legal Services serves most of the
16 state outside of the Hartford County area and the New
17 Haven County area, both of which have other legal
18 services programs, and we all do work together on issues,
19 including preventing homelessness.

20 We will be submitting something to the
21 Department. The comment period ends I think on Friday,
22 the 8th. We basically, you know, welcome this funding
23 opportunity, because it should greatly increase the
24 coordination of services, both toward preventing

RE: 2008 ACTION PLAN FOR HOMELESSNESS PREVENTION (HPRP)
MAY 6, 2009

1 homelessness and the Rapid Re-Housing that's also part of
2 it.

3 Legal aid is very involved in many of the
4 communities, such as Middlesex County, in working with
5 the other organizations that focus on this area. We
6 would like to see this plan specifically address the fact
7 that legal services is a very important, in fact, many
8 times critical part in preventing homelessness for
9 families.

10 We do that through a lot of tenant
11 education, for example, informing people of their rights
12 and making sure that if they face an addiction or subsidy
13 termination that they utilize their rights to have
14 hearings, whether it be administrative hearings, or
15 hearings in court.

16 We accept referrals from many community
17 agencies that will have a client come in, who may be at
18 risk of homelessness. Not only can we address the
19 housing issue that may be involved, but there's often
20 income issues, and we have other staff that can work with
21 the Department of Social Services to see if there's
22 income that they may be eligible for.

23 We have attorneys that focus on social
24 security disability. Many of the low income clients who

RE: 2008 ACTION PLAN FOR HOMELESSNESS PREVENTION (HPRP)
MAY 6, 2009

1 might become disabled, excuse me, become homeless,
2 because they are disabled and they may not be receiving
3 adequate income to support themselves, so through appeals
4 to social security we can often secure that income.

5 Legal Services has a full range of
6 services. We assist families who have children who are
7 in school. Maybe they had to go to a shelter. They may
8 need to be assisted to make sure they continue to get the
9 educational services.

10 Basically, the point I just want to make
11 is that I think that Legal Services are a critical part
12 of the plan, and they should be more specifically
13 addressed in this. I'll see if I can come up with places
14 to put it or whatever.

15 I think, also, that I do want to point out
16 that funding for Legal Services is actually at a very
17 critical point. The main funding source that we've
18 depended on for many years has basically crashed over the
19 last year, because it was coming out of real estate
20 transactions. I'm glad to see the nod awareness.

21 It's something that has become more public
22 knowledge in the last year, and we've had to go
23 essentially begging to the State Legislature in what, as
24 you know, is the worst fiscal situation that the State

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MAY 6, 2009

1 has faced to ask for money to continue the services that
2 are needed.

3 Fortunately, there is a good amount of
4 support for that in the legislature, and the Judicial
5 Department, for example, is assisting in this, because
6 they recognize that, you know, it's part of the services
7 of the State Justice System to make sure that there's
8 available legal services both to assist pro se people and
9 to represent more people who need the services of a
10 lawyer to adequately present their cases in court.

11 We're certainly hoping that there will be
12 something coming out of the State Legislature, but this
13 kind of funding we believe that we will qualify as the
14 sole source provider of legal services.

15 We may be able to work something out with
16 a contractor, whatever, to make sure that we get some
17 funding and that the services, then, are contracted for,
18 whether they be evaluating the clients, you know, who may
19 need service, providing a certain amount of
20 representation, or whatever might be required. Thank you
21 for this opportunity. I'll sign my name here now.

22 CHAIRPERSON LANDRY: And just to let you
23 know, I think we have received written comment from your
24 other half of the state, Legal Services for New Haven and

RE: 2008 ACTION PLAN FOR HOMELESSNESS PREVENTION (HPRP)
MAY 6, 2009

1 Hartford. We just got it.

2 Some people have been walking in since I
3 started. I'm not sure if anyone else is ready to provide
4 any public comment at this time. I'd like to give you
5 the opportunity, and, as I mentioned before, I can break,
6 and we can come back on record when others of you are
7 ready to provide comment. Is anybody ready?

8 MS. MICHELE CANDERINO: Hello. I'm
9 Michele Canderino. I'm the Director of Homeless Services
10 for Catholic Charities in the Greater Danbury area.
11 Currently, Greater Danbury is able to provide
12 comprehensive and collaborative services to the homeless
13 in our area.

14 At this time, we are seeing an ever
15 increasing population of those who would fall within the
16 boundaries of this grant. We are hopeful that we will be
17 able to prevent people from ever being homeless or at
18 least decrease the amount of time they will be at the
19 shelter if we were able to access this grant.

20 We did have a few questions about or some
21 clarification that we were looking for in the wording.
22 One of the questions was if we could better define what
23 the five catchment areas would be. We haven't seen that
24 written anywhere.

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1 Also, is the money being divided equally
2 among the five areas? And, also, what kind of
3 certification process, if any, will agencies that respond
4 to the RFP need? Will they need to be certified by the
5 local municipalities, and what would that entail? I'm
6 done. Thank you.

7 CHAIRPERSON LANDRY: Okay. Is there
8 anybody else that's ready? Sure. It gets easier, right?

9 MR. PAUL CARR: I'm Paul Carr. I
10 represent the Greater Hartford Community of Promise,
11 located here in Rocky Hill. Among the five promises that
12 our program makes to children who participate is that
13 they would have a safe place to be when they're not in
14 school.

15 Lately, it seems more and more apparent
16 that we need to provide a safe place for some of the kids
17 to be when they no longer have a home, so we've just
18 recently turned their attention to the issue of
19 homelessness, and I attended today, because I wanted to
20 see what the process was going forward. That's basically
21 all I have to say today.

22 CHAIRPERSON LANDRY: Thank you. Is there
23 anybody else that's ready and would like to provide
24 comment? Like I said, I'll break for awhile if you want

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MAY 6, 2009

1 to wait. I don't want to cut anybody off.

2 I want to thank you very much for all the
3 comments that have been provided so far, and, at this
4 time, there are other people here, and we're going to
5 close for public comment now and possibly reopen, at
6 which time others may want to provide comment. Thank
7 you.

8 (Off the record)

9 CHAIRPERSON LANDRY: This is Debra Landry
10 again, and we do have some other persons that have showed
11 up to provide public comment. Again, I just ask that you
12 identify and sign in, so that we properly represent you.

13 MR. GARY EVANS: Thank you very much.
14 Gary Evans, Director of Housing Community Development and
15 Asset Building for Co-Opportunity. We're not-for-profit,
16 located in Hartford. Been around for 21 years, providing
17 asset building strategies for individuals in the Hartford
18 area, and we have contracts throughout the entire state.

19 Our mission is to increase the income
20 earnings and assets of the clients we provide services
21 to, and, right now, a portion of that would be for
22 individuals who are in transitional housing or could be
23 full-time in a shelter.

24 The opportunities that are coming from

RE: 2008 ACTION PLAN FOR HOMELESSNESS PREVENTION (HPRP)
MAY 6, 2009

1 this are, you know, when you talk about other resources
2 out there, could potentially be, while they might be a
3 short period of time, kind of boundless. We have a great
4 opportunity to impact a lot of individuals, and in
5 working with the shelters and individuals, our job is to
6 try to move someone from transitional housing, make them
7 financially stable and self-sufficient, so that they go
8 from transitional to something more permanent, and, so,
9 this is more of an opportunity for me to talk about Co-
10 Opportunity, but to also ask a question in terms of
11 what's available in terms of partnering on a regional
12 level. Will there be opportunities to partner?

13 That means, also, with the five catchment
14 areas out there, is there an opportunity to leverage free
15 sources between the five catchment areas and the region
16 as a whole? That's it.

17 CHAIRPERSON LANDRY: This is Debra Landry.
18 It is now 2:35, and it appears that we have no other
19 persons that would like to provide public comment, and
20 I'd like to close this public hearing. Again, 2:35.

21 (Whereupon, the hearing adjourned at 2:35
22 p.m.)

RE: 2008 ACTION PLAN FOR HOMELESSNESS PREVENTION (HPRP)
MAY 6, 2009

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STATE OF CONNECTICUT
DEPARTMENT OF ECONOMIC AND COMMUNITY DEVELOPMENT

* * * * *

IN RE: MAY 7, 2009

2008 ACTION PLAN FOR THE 10:00 A.M.
HOMELESSNESS PREVENTION AND
RAPID RE-HOUSING PROGRAM

* * * * *

BEFORE: RICK ROBBINS, CHAIRPERSON

RE: 2008 ACTION PLAN FOR HOMELESSNESS PREVENTION (HPRP)
MAY 7, 2009

1 . . .Verbatim proceedings of a hearing
2 before the State of Connecticut, Department of Economic
3 and Community Development, in the matter of the 2008
4 Action Plan for the Homelessness Prevention and Rapid Re-
5 Housing Program, held at 2750 Dixwell Avenue, Hamden,
6 Connecticut, on May 7, 2009 at 10:00 a.m. . . .

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10 CHAIRPERSON RICK ROBBINS: Good morning.
11 Today is May 7, 2009, and it's approximately 10:00 a.m.
12 I'm Rick Robbins from the Connecticut Department of
13 Economic and Community Development, and I'm here to
14 receive public comment relative to a notice issued by the
15 State of Connecticut on the State's Draft Substantial
16 Amendment to the Consolidated Plan for 2008 and the
17 Action Plan for the Homeless Prevention and Rapid Re-
18 Housing Program.

19 The public comment period began on April
20 23rd and ends on May 8th. Public hearings on the State's
21 Draft Substantial Amendment have been held in Rocky Hill,
22 this is the second hearing in Hamden, and there will be a
23 hearing tomorrow in Coventry.

24 The State's Draft Plan is for the

RE: 2008 ACTION PLAN FOR HOMELESSNESS PREVENTION (HPRP)
MAY 7, 2009

1 utilization of approximately 10.8 million dollars for
2 funding under Title XII of the American Recovery and
3 Reinvestment Act of 2009.

4 A copy of the Act can be found at
5 hud.gov\recovery. The purpose of the Homeless Prevention
6 and Rapid Re-Housing Program funding is to provide
7 financial assistance and services to either prevent
8 individuals and families from becoming homeless or to
9 help those that have experienced homelessness to move --
10 be quickly re-housed and stabilized.

11 The State's funds will be administered by
12 the Department of Social Services. All interested
13 parties are encouraged to participate in reviewing and
14 providing oral or written comments on the State's Draft
15 Plan. A copy of the State's Draft Plan, as well as the
16 State's Five-Year Consolidated Plan and Annual Action
17 Plans, are available on the Department's website at
18 www.decd.org.

19 Written comments can be sent to the
20 Department, addressed to W. Michael Regan, Community
21 Development Assistant Administrator, the Office of
22 Strategy and Policy at the DECD, or they can be e-mailed
23 to arra.comments@ct.gov. All comments received will be
24 addressed in our citizen participation and public comment

RE: 2008 ACTION PLAN FOR HOMELESSNESS PREVENTION (HPRP)
MAY 7, 2009

1 section of our amendment.

2 My role here today is to make sure that
3 your comments are part of the public record and that they
4 are included in the Substantial Amendment. I ask that
5 you start by identifying yourself and who you represent
6 before presenting your comments.

7 At this point, I will open it up to public
8 comment. Thank you. If you'd come to the table, I'd
9 appreciate it.

10 MS. BERNICE GIBBS: Before she gets
11 started, could I have the website again,
12 hud.gov\recovery?

13 CHAIRPERSON ROBBINS: Recovery.

14 MS. JUDY SKLARZ: Good morning. My name
15 is Judy Sklarz. I am representing today United Way of
16 Coastal Fairfield County, which stretches from Stratford
17 down to Darien, and, also, the Bridgeport Continuum of
18 Care.

19 Mine are sort of comments and a couple of
20 questions, so I guess that's appropriate. I would like
21 to suggest that a six to eight-week return time for any
22 regional proposal be allowed, because the nature of a
23 region, whatever that is, will take some time to
24 negotiate and make sure that the folks who need to

RE: 2008 ACTION PLAN FOR HOMELESSNESS PREVENTION (HPRP)
MAY 7, 2009

1 participate in this have sufficient time to think about
2 their roles, rather than just throw something on a piece
3 of paper, which isn't well thought out, which leads to
4 sort of the determination of the catchment area clause.

5 I don't know if there has been a
6 determination. Rumor has it it's the foreclosure
7 prevention. Those are the words I've heard. For us,
8 that's great, because it covers what we cover.

9 Again, when you say five catchment areas,
10 that's sort of a little too loose. It would be good to
11 define those, so, again, you know, we're not running
12 around the state trying to figure out who we're supposed
13 to be talking to while developing an application.

14 There also needs to be some clarity for
15 cities, such as Bridgeport, New Haven and the others,
16 where they have gotten their own allocations, but how
17 will these funds apply or not apply to them, you know,
18 granted, in Bridgeport, there's 1.3 million, and while
19 that's a lot of money, there are a lot of people, and the
20 costs of relocating, re-housing and prevention in
21 Fairfield County are quite high.

22 We just need clarity in our own area to
23 figure out what's going on. Basically, those are my
24 comments.

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MAY 7, 2009

1 CHAIRPERSON ROBBINS: Thank you.

2 MS. SKLARZ: You're welcome. How long are
3 you here for?

4 CHAIRPERSON ROBBINS: I'll be here
5 probably until there's no more comments.

6 MS. SKLARZ: I heard somebody from CCH was
7 coming.

8 CHAIRPERSON ROBBINS: Okay. What we'll
9 do, if there's no one else that wants to comment at this
10 time, we'll adjourn the public hearing until others show,
11 and then we'll reopen the hearing and take additional
12 comments, so we may be in and out of this. That way, we
13 don't have to record the whole thing while we sit here in
14 silence, okay? Thank you.

15 (Off the record)

16 CHAIRPERSON ROBBINS: Since no member of
17 the public has appeared to provide comment for over an
18 hour, we will close this hearing at 11:15 on the 9th day
19 of May. Thank you.

20 (Whereupon, the hearing adjourned at 11:15
21 a.m.)

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MAY 7, 2009

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JUDY SKLARZ

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STATE OF CONNECTICUT
DEPARTMENT OF ECONOMIC AND COMMUNITY DEVELOPMENT

* * * * *

IN RE: MAY 8, 2009

2008 ACTION PLAN FOR THE 10:09 A.M.
HOMELESSNESS PREVENTION AND
RAPID RE-HOUSING PROGRAM

* * * * *

BEFORE: DEBRA LANDRY, CHAIRPERSON

RE: 2008 ACTION PLAN FOR HOMELESSNESS PREVENTION (HPRP)
MAY 8, 2009

1 . . .Verbatim proceedings of a hearing
2 before the State of Connecticut, Department of Economic
3 and Community Development, in the matter of the 2008
4 Action Plan for the Homelessness Prevention and Rapid Re-
5 Housing Program, held at 1712 Main Street, Coventry,
6 Connecticut, on May 8, 2009 at 10:09 a.m. . . .

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10 CHAIRPERSON DEBRA LANDRY: Today is
11 Friday, May 8, 2009. It's 10:00 a.m. I am Debra Landry
12 of the Department of Economic and Community Development,
13 and I'm here to receive public comment in response to the
14 State's Draft Substantial Amendment to the Consolidated
15 Plan 2008 Action Plan for Homelessness Prevention and
16 Rapid Re-Housing, also known as HPRP.

17 The State's Draft HPRP Substantial
18 Amendment is for the utilization of approximately
19 \$10,818,309 of funding under Title XII of the American
20 Recovery and Reinvestment Act of 2009, also known as
21 ARRA, and as they apply to the Federal programs included
22 in the State's 2005/2009 Consolidated Plan.

23 The purpose of the HPRP funding is to
24 provide financial assistance and services to either

RE: 2008 ACTION PLAN FOR HOMELESSNESS PREVENTION (HPRP)
MAY 8, 2009

1 prevent individuals and families from becoming homeless
2 or help those who are experiencing homelessness to be
3 quickly re-housed and stabilized.

4 The State's HPRP funds will be
5 administered by the Department of Social Services and the
6 Department of Economic and Community Development acts as
7 the lead for the State's Consolidated Plan.

8 My role here today is to make sure that
9 your comments become part of the public record and that
10 they are addressed in the Substantial Amendment. I would
11 ask before you present your comments you start by
12 identifying yourself and, as applicable, who you are
13 representing.

14 Since there's no member of the public
15 currently present to provide comment, I will recess until
16 such time as someone appears to do so.

17 (Off the record)

18 MS. KATHRYN CREES: I'm Kathryn Crees.
19 I'm the Vice President of Development and Community
20 Services for the Access Community Action Agency, but I'm
21 actually here representing the Windham and Tolland County
22 Continuum of Care.

23 Through this funding source, there is some
24 collaboration that's required with the continuums, and as

RE: 2008 ACTION PLAN FOR HOMELESSNESS PREVENTION (HPRP)
MAY 8, 2009

1 part of that for the Windham and Tolland County Continuum
2 of Care, I'm here to speak to just a couple of things.
3 One is in the Draft Plan. It's noted competitive
4 proposals are requested from five catchment areas.

5 So the Windham/Tolland Continuum of Care
6 requests that consideration be given when designing these
7 catchment areas to geographic areas with existing
8 continuums and homeless service providers, specifically
9 by creating separate and distinct northeastern and
10 southeastern catchment areas to ensure equitable
11 distribution of funds to service providers.

12 We're a little concerned with the five
13 catchment areas, as to how they'll be broken out and
14 whether, say, like the southeastern and sort of the
15 northeastern Continuum of Care will be competing against
16 each other.

17 Typically, when that happens, this area
18 gets shortchanged, so we want to make sure that the
19 people that are represented in northeastern Connecticut
20 and the service providers in northeastern Connecticut
21 have a fair opportunity to apply for these funds and
22 assist the people that we have in this area, because
23 there's a lot of people doing Rapid Re-Housing.

24 We have counselors in shelters. We have

RE: 2008 ACTION PLAN FOR HOMELESSNESS PREVENTION (HPRP)
MAY 8, 2009

1 no fee shelters. We have, you know, permanent shelters,
2 so we want to make sure that the people in this area are
3 properly represented in that RFP.

4 The second thing is, and I know this is
5 difficult, but I was asked to say this, so I will, the
6 Windham/Tolland Continuum also requests that
7 consideration be given to maximizing the impact of these
8 funds by ensuring the State utilizes as much funding as
9 possible to direct service delivery needs and minimize
10 the administrative costs of the State. I had to say
11 that.

12 That's really the only comments we have,
13 other than we want to thank you for the opportunity to
14 present, and that was it. We just really want to make
15 sure that there's an opportunity for the northeast area
16 to be competitive in the solicitation.

17 CHAIRPERSON LANDRY: Thank you very much
18 for your comments today.

19 MS. CREES: Okay. That's all I have.

20 CHAIRPERSON LANDRY: Is there anyone else
21 that is interested in providing comment at this time?
22 Okay. We'll close down again until further --

23 (Off the record)

24 CHAIRPERSON LANDRY: This is Debra Landry

RE: 2008 ACTION PLAN FOR HOMELESSNESS PREVENTION (HPRP)
MAY 8, 2009

1 with the Department of Economic and Community
2 Development, and since no other member of the public has
3 appeared to provide comment, we will close this hearing
4 at 12:00 noon.

5 (Whereupon, the hearing adjourned at 12:00
6 p.m.)

RE: 2008 ACTION PLAN FOR HOMELESSNESS PREVENTION (HPRP)
MAY 8, 2009

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

Appendix C: Consolidated Plan Final Rule

Consolidated Plan Final Rule

24 CFR Part 91
January 5, 1995
(updated through February 6, 2006)

TITLE 24--HOUSING AND URBAN DEVELOPMENT

PART 91 CONSOLIDATED SUBMISSIONS FOR COMMUNITY PLANNING AND DEVELOPMENT PROGRAMS

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Authority: 42 U.S.C. 3535(d), 3601-3619, 5301-5315, 11331-11388, 12701-12711, 12741-12756, and 12901-12912.

Source: 60 FR 1896, Jan. 5, 1995, unless otherwise noted.

Sec. 91.2 Applicability.

(a) The following formula grant programs are covered by the consolidated plan:

- (1) The Community Development Block Grant (CDBG) programs (see 24 CFR part 570, subparts D and I);
- (2) The Emergency Shelter Grants (ESG) program (see 24 CFR part 576);
- (3) The HOME Investment Partnerships (HOME) program (see 24 CFR part 92); and
- (4) The Housing Opportunities for Persons With AIDS (HOPWA) program (see 24 CFR part 574).

(b) The following programs require either that the jurisdiction receiving funds directly from HUD have a consolidated plan that is approved by HUD or that the application for HUD funds contain a certification that the application is consistent with a HUD-approved consolidated plan:

- (1) The HOPE I Public Housing Homeownership (HOPE I) program (see 24 CFR Subtitle A, Appendix A);
- (2) The HOPE II Homeownership of Multifamily Units (HOPE II) program (see 24 CFR Subtitle A, Appendix B);
- (3) The HOPE III Homeownership of Single Family Homes (HOPE III) program (see 24 CFR part 572);
- (4) The Low-Income Housing Preservation (prepayment avoidance incentives) program, when administered by a State agency (see 24 CFR 248.177);
- (5) The Supportive Housing for the Elderly (Section 202) program (see 24 CFR part 889);
- (6) The Supportive Housing for Persons with Disabilities program (see 24 CFR part 890);
- (7) The Supportive Housing program (see 24 CFR part 583);
- (8) The Single Room Occupancy Housing (SRO) program (see 24 CFR part 882, subpart H);
- (9) The Shelter Plus Care program (see 24 CFR part 582);
- (10) The Community Development Block Grant program--Small Cities (see 24 CFR part 570, subpart F);
- (11) HOME program reallocations;
- (12) Revitalization of Severely Distressed Public Housing (section 24 of the United States Housing Act of 1937, (42 U.S.C. 1437 et seq.));
- (13) Hope for Youth: Youthbuild (see 24 CFR part 585);
- (14) The John Heinz Neighborhood Development program (see 24 CFR part 594);
- (15) The ``Lead-Based Paint Hazard Reduction Program (see 42 U.S.C. 4852(o));"

(16) Grants for Regulatory Barrier Removal Strategies and Implementation (section 1204, Housing and Community Development Act of 1992 (42 U.S.C. 12705c)); and

(17) Competitive grants under the Housing Opportunities for Persons With AIDS (HOPWA) program (see 24 CFR part 574).

(c) Other programs do not require consistency with an approved consolidated plan. However, HUD funding allocations for the Section 8 Certificate and Voucher Programs are to be made in a way that enables participating jurisdictions to carry out their consolidated plans.

(d) The Public Housing Agency Plan submission (PHA Plan) (see 24 CFR part 903) includes a certification by the appropriate state or local official that the PHA Plan is consistent with the applicable consolidated plan for the jurisdiction in which the public housing agency is located and must describe the manner in which the applicable contents of the PHA Plan are consistent with the consolidated plan.

[60 FR 1896, Jan. 5, 1995, as amended at 60 FR 16379, Mar. 30, 1995; 64 FR 50223, Sept. 15, 1999; 71 FR 6961, Feb. 9, 2006]

Sec. 91.510 Consistency determinations.

(a) Applicability. For competitive programs, a certification of consistency of the application with the approved consolidated plan for the jurisdiction may be required, whether the applicant is the jurisdiction or another applicant.

(b) Certifying authority. (1) The certification must be obtained from the unit of general local government if the project will be located in a unit of general local government that is required to have a consolidated plan, is authorized to use an abbreviated consolidated plan but elects to prepare and has submitted a full consolidated plan, or is authorized to use an abbreviated consolidated plan and is applying for the same program as the applicant pursuant to the same Notice of Funding Availability (and therefore has or will have an abbreviated consolidated plan for the fiscal year for that program).

(2) If the project will not be located in a unit of general local government, the certification may be obtained from the State or, if the project will be located in a unit of general local government authorized to use an abbreviated consolidated plan, from the unit of general local government if it is willing to prepare such a plan.

(3) Where the recipient of a HOPWA grant is a city that is the most populous unit of general local government in an EMSA, it also must obtain and keep on file certifications of consistency from such public officials for each other locality in the EMSA in which housing assistance is provided.

(c) Meaning. A jurisdiction's certification that an application is consistent with its consolidated plan means the jurisdiction's plan shows need, the proposed activities are consistent with the jurisdiction's strategic plan, and the location of the proposed activities is consistent with the geographic areas specified in the plan. The jurisdiction shall provide the reasons for the denial when it fails to provide a certification of consistency.

(Approved by the Office of Management and Budget under control number 2506-0117)

Certification of Consistency with the Consolidated Plan

U.S. Department of Housing
and Urban Development

I certify that the proposed activities/projects in the application are consistent with the jurisdiction's current, approved Consolidated Plan.
(Type or clearly print the following information:)

Applicant Name: _____

Project Name: _____

Location of the Project: _____

Name of the Federal
Program to which the
applicant is applying: _____

Name of
Certifying Jurisdiction: _____

Certifying Official
of the Jurisdiction
Name: _____

Title: _____

Signature: _____

Date: _____

Appendix D: Eviction Foreclosure Prevention Catchment Area

Service Catchments				
Catchment I	Catchment II	Catchment III	Catchment IV	Catchment V
Bridgeport	Ansonia	Ashford	Andover	Barkhamsted
Darien	Bethany	Bozrah	Avon	Beacon Falls
Easton	Branford	Brooklyn	Berlin	Bethel
Fairfield	Chester	Canterbury	Bloomfield	Bethlehem
Greenwich	Clinton	Chaplin	Bolton	Bridgewater
Monroe	Cromwell	Colchester	Bristol	Brookfield
New Cannan	Deep River	Columbia	Burlington	Canaan
Norwalk	Derby	Coventry	Canton	Cheshire
Stamford	Durham	East Lyme	East Granby	Colebrook
Stratford	East Haddam	Eastford	East Hartford	Cornwall
Trumbull	East Hampton	Franklin	East Windsor	Danbury
Weston	East Haven	Griswold	Ellington	Goshen
Westport	Essex	Groton	Enfield	Hartland
Wilton	Guilford	Hampton	Farmington	Harwinton
	Haddam	Killingly	Glastonbury	Kent
	Hamden	Lebanon	Granby	Litchfield
	Killingworth	Ledyard	Hartford	Middlebury
	Lyme	Lisbon	Herbron	Morris
	Madison	Mansfield	Manchester	Naugatuck
	Meriden	Montville	Marlborough	New Fairfield
	Middlefield	New London	New Britain	New Hartford
	Middletown	North Stonington	Newington	New Milford
	Milford	Norwich	Plainville	Newtown
	New Haven	Plainfield	Plymouth	Norfolk
	North Branford	Pomfret	Rocky Hill	North Canaan
	North Haven	Preston	Simsbury	Oxford
	Old Lyme	Putnam	Somers	Prospect
	Old Saybrook	Salem	South Windsor	Redding
	Orange	Scotland	Southington	Ridgefield
	Portland	Sprague	Stafford	Roxbury
	Seymour	Sterling	Suffield	Salisbury
	Shelton	Stonington	Tolland	Sharon
	Wallingford	Thompson	Vernon	Sherman
	West Haven	Union	West Hartford	Southbury
	Westbrook	Voluntown	Wethersfield	Thomaston
	Woodbridge	Waterford	Windsor	Torrington
		Willington	Windsor Locks	Warren
		Windham		Washington
		Woodstock		Waterbury
				Watertown
				Winchester
				Wolcott
				Woodbury

Appendix E: Application For Federal Assistance SF-424

Application for Federal Assistance SF-424 Version 02

*1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	*2. Type of Application * If Revision, select appropriate letter(s) <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision *Other (Specify) _____
--	---

3. Date Received:	4. Applicant Identifier:
-------------------	--------------------------

5a. Federal Entity Identifier:	*5b. Federal Award Identifier:
--------------------------------	--------------------------------

State Use Only:

6. Date Received by State:	7. State Application Identifier:
----------------------------	----------------------------------

8. APPLICANT INFORMATION:

*a. Legal Name: State of Connecticut, Department of Social Services

*b. Employer/Taxpayer Identification Number (EIN/TIN): 06-6000798	*c. Organizational DUNS: 807854435
--	---------------------------------------

d. Address:

*Street 1: 25 Sigourney Street
Street 2: _____
*City: Hartford
County: _____
*State: CT
Province: _____
*Country: USA
*Zip / Postal Code 06106

e. Organizational Unit:

Department Name: Department of Social Services	Division Name: Community, Energy and Refugee Services
---	--

f. Name and contact information of person to be contacted on matters involving this application:

Prefix: Ms. *First Name: Pamela
Middle Name: A.
*Last Name: Giannini
Suffix: _____

Title: Director, Bureau of Aging, Community & Social Work Services

Organizational Affiliation:

*Telephone Number: 860-424-5277 Fax Number: 860-424-4886

*Email: pamela.giannini@ct.gov

Application for Federal Assistance SF-424

Version 02

***9. Type of Applicant 1: Select Applicant Type:**

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

*Other (Specify)

10 Name of Federal Agency:*U.S. Department of Housing & Urban Development****11. Catalog of Federal Domestic Assistance Number:**

14.257

CFDA Title:

Homelessness Prevention and Rapid Rre-Housing Program (HPRP)

***12 Funding Opportunity Number:**

DE-FOA-0000051

*Title:

American Recovery and Reinvestment Act (ARRA)

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):***15. Descriptive Title of Applicant's Project:**

The Recovery Act funds will be used (to ramp up to meet the goals and expectations in the weatherization of swellings of low-income households; to preserve and create jobs and promote economic recovery; to assist those most impacted by the recession; to provide investments needed to increase in transportation, environmental protection, and other infrastructure that will provide long term economic benefits) and to stabilize State and local government budgets.

Application for Federal Assistance SF-424

Version 02

16. Congressional Districts Of:

*a. Applicant: 1

*b. Program/Project: 1,2,3,4,5 Statewide

17. Proposed Project:

*a. Start Date: 9/30/09

*b. End Date: 9/29/2010

18. Estimated Funding (\$):

*a. Federal	<u>10,818,309</u>
*b. Applicant	_____
*c. State	_____
*d. Local	_____
*e. Other	_____
*f. Program Income	_____
*g. TOTAL	<u>10,818,309</u>

***19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- a. This application was made available to the State under the Executive Order 12372 Process for review on _____
- b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- c. Program is not covered by E. O. 12372

***20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes", provide explanation.)**

Yes No

21. *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)

** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions

Authorized Representative:

Prefix: Ms. *First Name: Claudette

Middle Name: J

*Last Name: Beaulieu

Suffix: _____

*Title: Deputy Commissioner

*Telephone Number: 860-424-5004

Fax Number: 860-424-5899

* Email: Claudette.J.Beaulieu@ct.gov

*Signature of Authorized Representative *Date Signed: 5/15/09

Application for Federal Assistance SF-424

Version 02

***Applicant Federal Debt Delinquency Explanation**

The following should contain an explanation if the Applicant organization is delinquent of any Federal Debt.

Appendix F:
Homeless Prevention and Rapid Re-Housing Program (HPRP)
Certifications

Homelessness Prevention and Rapid Re-Housing Program (HPRP) Certifications

The HPRP Grantee certifies that:

Consolidated Plan – It is following a current HUD-approved Consolidated Plan or CHAS.

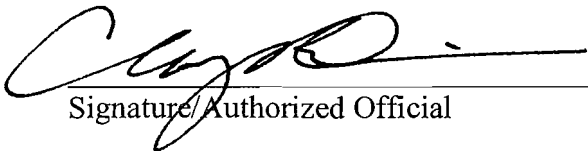
Consistency with Plan – The housing activities to be undertaken with HPRP funds are consistent with the strategic plan.

Confidentiality – It will develop and implement procedures to ensure:

- (1) The confidentiality of records pertaining to any individual provided with assistance; and
- (2) That the address or location of any assisted housing will not be made public, except to the extent that this prohibition contradicts a preexisting privacy policy of the grantee.

Discharge Policy – A certification that the State or jurisdiction has established a policy for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent such discharge from immediately resulting in homelessness for such persons.

HMIS – It will comply with HUD's standards for participation in a local Homeless Management Information System and the collection and reporting of client-level information.



Signature/Authorized Official

5/15/09

Date

Deputy Commissioner for Programs

Title

Appendix G:

**GENERAL CERTIFICATION FOR STATE AND LOCAL GOVERNMENT FOR THE
HOMELESSNESS PREVENTION AND RAPID RE-HOUSING PROGRAM (HPRP)**

GENERAL CERTIFICATIONS FOR STATE OR LOCAL GOVERNMENT FOR THE HOMELESSNESS PREVENTION AND RAPID RE-HOUSING PROGRAM (HPRP)

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the state, territory, or local government certifies that:

Affirmatively Further Fair Housing -- The state, territory, or local government will affirmatively further fair housing, which means it will conduct an analysis of impediments to fair housing choice within the jurisdiction or state, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting that analysis and actions in this regard.

Drug-Free Workplace -- It will or will continue to provide a drug-free workplace by:

1. Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the grantee's workplace and specifying the actions that will be taken against employees for violation of such prohibition;
2. Establishing an ongoing drug-free awareness program to inform employees about:
 - (a) The dangers of drug abuse in the workplace;
 - (b) The grantee's policy of maintaining a drug-free workplace;
 - (c) Any available drug counseling, rehabilitation, and employee assistance programs; and
 - (d) The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace;
3. Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph 1;
4. Notifying the employee in the statement required by paragraph 1 that, as a condition of employment under the grant, the employee will -
 - (a) Abide by the terms of the statement; and
 - (b) Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;
5. Notifying the agency in writing, within ten calendar days after receiving notice under subparagraph 4(b) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the Federal agency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;
6. Taking one of the following actions, within 30 calendar days of receiving notice under subparagraph 4(b), with respect to any employee who is so convicted -
 - (a) Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or

- (b) Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, state, or local health, law enforcement, or other appropriate agency;
7. Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs 1, 2, 3, 4, 5 and 6.

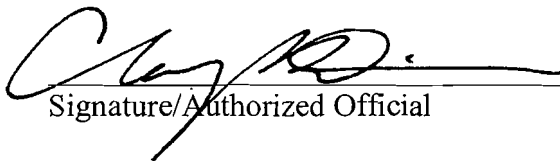
Anti-Lobbying -- To the best of the state, territory, or local government's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraphs 1 and 2 of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

Authority of Local Government, State, or Territory -- The submission of the consolidated plan is authorized under state law and local law (as applicable) and the jurisdiction or state possesses the legal authority to carry out the programs under the consolidated plan for which it is seeking funding, in accordance with applicable HUD regulations.

Consistency with Plan -- The housing activities to be undertaken with HPRP funds are consistent with the strategic plan.

Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968, and implementing regulations at 24 CFR Part 135.



Signature/Authorized Official

5/15/09

Date

Deputy Commissioner for Programs

Title

APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING AND DRUG-FREE WORKPLACE REQUIREMENTS:

A. Lobbying Certification

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

B. Drug-Free Workplace Certification

1. By signing and/or submitting this application or grant agreement, the grantee is providing the certification.
2. The certification is a material representation of fact upon which reliance is placed when the agency awards the grant. If it is later determined that the grantee knowingly rendered a false certification, or otherwise violates the requirements of the Drug-Free Workplace Act, HUD, in addition to any other remedies available to the Federal Government, may take action authorized under the Drug-Free Workplace Act.
3. Workplaces under grants, for grantees other than individuals, need not be identified on the certification. If known, they may be identified in the grant application. If the grantee does not identify the workplaces at the time of application, or upon award, if there is no application, the grantee must keep the identity of the workplace(s) on file in its office and make the information available for Federal inspection. Failure to identify all known workplaces constitutes a violation of the grantee's drug-free workplace requirements.
4. Workplace identifications must include the actual address of buildings (or parts of buildings) or other sites where work under the grant takes place. Categorical descriptions may be used (e.g., all vehicles of a mass transit authority or State highway department while in operation, State employees in each local unemployment office, performers in concert halls or radio stations).
5. If the workplace identified to the agency changes during the performance of the grant, the grantee shall inform the agency of the change(s), if it previously identified the workplaces in question (see paragraph three).
6. The Grantee may insert in the space provided below the site(s) for the performance of work done in connection with the specific grant:

Place of Performance (Street address, city, county, state, zip code)

25 Sigourney Street, Hartford, CT 06106

Check if there are workplaces on file that are not identified here.

The certification with regard to the drug-free workplace is required by 24 CFR part 24, subpart F.

7. Definitions of terms in the Nonprocurement Suspension and Debarment common rule and Drug-Free Workplace common rule apply to this certification. Grantees' attention is called, in particular, to the following definitions from these rules:

"Controlled substance" means a controlled substance in Schedules I through V of the Controlled Substances Act (21 U.S.C. 812) and as further defined by regulation (21 CFR 1308.11 through 1308.15);

"Conviction" means a finding of guilt (including a plea of nolo contendere) or imposition of sentence, or both, by any judicial body charged with the responsibility to determine violations of the Federal or State criminal drug statutes;

"Criminal drug statute" means a Federal or non-Federal criminal statute involving the manufacture, distribution, dispensing, use, or possession of any controlled substance;

"Employee" means the employee of a grantee directly engaged in the performance of work under a grant, including: (i) All "direct charge" employees; (ii) all "indirect charge" employees unless their impact or involvement is insignificant to the performance of the grant; and (iii) temporary personnel and consultants who are directly engaged in the performance of work under the grant and who are on the grantee's payroll. This definition does not include workers not on the payroll of the grantee (e.g., volunteers, even if used to meet a matching requirement; consultants or independent contractors not on the grantee's payroll; or employees of subrecipients or subcontractors in covered workplaces).