

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	State of Colorado
Name of Entity or Department Administering Funds	Colorado Department of Local Affairs Division of Housing
HPRP Contact Person (person to answer questions about this amendment and HPRP)	Lynn Shine
Title	Manager, Community Relations, Research & Publications
Address Line 1	1313 Sherman St., Room 518
Address Line 2	
City, State, Zip Code	Denver, CO 80203
Telephone	303-866-2046
Fax	303-866-4077
Email Address	lynn.shine@state.co.us
Authorized Official (if different from Contact Person)	Susan Kirkpatrick
Title	Executive Director, Dept. of Local Affairs
Address Line 1	1313 Sherman St., Room 500
Address Line 2	
City, State, Zip Code	Denver, CO 80203
Telephone	303-866-4904
Fax	
Email Address	susan.kirkpatrick@state.co.us
Web Address where this Form is Posted	www.dola.colorado.gov

Amount Grantee is Eligible to Receive*	\$ 8,154,036
Amount Grantee is Requesting	\$ 8,154,036

*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:

The Department of Local Affairs, Division of Housing (DOH), held two public hearings on its plans for using HPRP funds. The meetings were held on April 28, 2009 and May 6, 2009.

The April 28th meeting notice was published in the *Denver Post* on Sunday, April 26. The May 6th meeting notice was published in the *Denver Post* on Saturday, May 2nd, in both English and Spanish. In addition, we provided information via the Department of Local Affairs website located at the following URL:

<http://www.dola.colorado.gov/arra/index.html>. DOH sent e-mail notifications to over 600 stakeholders on our regular listServ with additional mailings to reach organizations in the disabled and minority communities. Homeless service agencies provided further distribution of the notices by incorporating the information into their listServes.

DOH posted the Substantial Amendment on the DOLA web site on April 28th and included this information in the notifications mentioned above. We received public comment from April 28th through May 15th. Comments and responses will appear in the final version of this plan.

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

- ☐ Grantee did not receive public comments.
- ☒ Grantee received and accepted all public comments.
- ☐ Grantee received public comments and did not accept one or more of the comments.

3. Provide a summary of the public comments regarding this substantial amendment. Include a summary of any comments or views not accepted and the reasons for non-acceptance.

Comments on HMIS: A large number of comments referred to the inadequacy of the State's existing HMIS, Tapestry. The comments are summarized below:

- Both the Balance of State and Metropolitan Denver Homeless Initiative have determined that Tapestry is unable to meet current needs and is unlikely to meet future needs.
- Strongly encourage DOH to include funding for a new HMIS package that is proven to work in other states and communities, as it is our position that

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Colorado does not have an existing functional HMIS. DOH should pursue a waiver from HUD to make this possible.

- Tapestry does not provide canned reports.
- Data export for even simple reports requires a high level of technical sophistication, posing a considerable barrier for agencies without IT staff; even lead agencies must use excessive resources to generate reports.
- While HUD's APRs can technically be generated out of Tapestry, the degree of technical assistance required for each agency is enormous and imposes a tremendous burden upon the lead agency
- Tapestry does not provide assistance with AHAR reports.
- Tapestry does not provide data quality and participation reports.
- Tapestry cannot any ad hoc reports, including ESG required reports unless an agency possesses very high levels of technical skill.
- Rapid entry is crucial for large-volume agencies. Tapestry does not have rapid entry functionality
- Tapestry's existing sharing function is inadequate. As such, it has not been activated in Colorado.
- Tapestry does not provide an adequate data validation function.
- Tapestry does not provide an adequate function for identifying and preventing duplicate records.
- Lack of scalability
- A recent online survey completed by HMIS users in Colorado indicated that 75.4% of respondents identified reporting as the most needed HMIS software feature. Among case managers, 81% (n = 131) said they wanted HMIS to track client services. Tapestry users report being unable to track client services and outcomes in a meaningful way.
- Tapestry's lack of intuitiveness poses significant difficulties in maintaining HUD compliance for user agencies.
- Tapestry offers no options for customized reporting, custom fields or screens thus rendering it useless for agencies except for some of their HUD reports.
- Many agencies run two data bases side-by-side resulting in double data entry and extra staff time.
- Cannot import data from other databases nor export data from Tapestry into other database programs.
- Tapestry is cumbersome and slow to use.
- Please use some HPRP money to find a new vendor and fix HMIS. We need to be able to agency share information about clients. This is one of the most efficient ways to track duplication and increase effective service to the client.

Response to these comments: The State will request a waiver of the HUD rule that HPRP funds cannot be used to replace an existing HMIS. This plan sets aside funds for both short-term fixes and for replacement software if that becomes possible. Please see the notes in Attachment A.

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Other Comments:

Several people commented on the importance of three items:

- Use of an integrated approach to homelessness prevention and re-housing. Have a single intake and assessment process to direct families and individuals into the appropriate form of assistance.
- Case management is essential to the success of both homelessness prevention and re-housing efforts.
- Importance of coordinated intake and assessment tools and processes to address a household's needs and resources and determine the most appropriate approach

Response: The revised substantial amendment incorporates all of these ideas.

Comment: Encourage use of a competitive application process.

Response: The substantial amendment calls for a competitive process as well as a mechanism for regional allocation of funds.

Comment: Prioritize larger organizations with the capacity to meet complex HUD regulations and ARRA reporting requirements, who are also committed to working with smaller agencies to provide wider access to those who need the program.

Response: The substantial amendment provides a significant role for large, high-capacity organizations that can comply with the complexity of both regulations and reporting requirements while also providing a role for small agencies that can provide readier access to those who need assistance.

Comment: Encourage priority be given to agencies that demonstrate ability to leverage other ARRA funding as well as mainstream programs.

Response: The Substantial Amendment includes this capacity in the competitive criteria.

Comment: Propose that 40% of funding be targeted to prevention and 60% to Rapid Re-Housing.

Comment: Strong case management and support services are critical to successful use of financial assistance and at least 25% of the funding in both prevention and re-housing should be used for this critical purpose.

Comment: Recommend that at least 4% of the administration funding be passed on to subgrantees.

Comment: Request that funding for technical assistance and support also be passed through.

Response: The substantial amendment has been revised to bring the budgeted amounts closer to this distribution.

Comment: Prevention funding should be targeted to those who are most likely to become homeless without such assistance.

Comment: Ensure that subgrantees do not allow HPRP funds to supplant existing funding.

Response: These issues are addressed in the HPRP notice, and are therefore already required by the plan.

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Comment: Prioritize funding to jurisdictions already receiving direct HPRP funding who are willing to coordinate prevention and re-housing services across county and city lines.

Response: The DOH substantial amendment deals with providing services across jurisdictions by working within the Continuum of Care framework.

Comment: Pay attention to rural areas, which have such long waiting lists for Section 8 that many people become homeless. There are high-functioning agencies that can handle the program requirements in rural areas.

Response: The allocation process in this substantial amendment attempts to ensure that funds proportional to area need will be available agencies in rural areas that have the capacity to use it effectively.

Comment: Please be sure that Boulder receives funding under this program, specifically in connection with its ongoing Housing Crisis Program.

Response: Funds are allocated to the Continuum of Care that includes Boulder, and organizations within the Boulder area will be able to apply for those funds on a competitive basis.

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: RFP Process

_____)

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

Response:

Set-asides:

The Colorado Department of Local Affairs, Division of Housing (DOH) will set aside HPRP grant funds to cover eligible administrative costs associated with the program. As required by the U.S. Department of Housing and Urban Development (HUD), the State will provide funding for Homeless Management Information Systems (HMIS). Additional set-asides include upgrades to the housing search website, "coloradohousingsearch.com" and funds for a housing resource guide.

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Allocations:

DOH will allocate remaining funds to each of the three Colorado continua of care (CoC). These monies will provide funding for client services for homelessness prevention and rapid re-housing that are the essence of the HPRP. As shown in "Attachment B", the State used unemployment data, number of foreclosures, percentage of state population and number of homeless persons to determine allocations.

Requests for Proposals:

DOH will issue a Request for Proposals (RFP) to select a single grantee for each CoC, who will subgrant the funds to agencies within their Continuum to ensure equitable distribution. The grantee for each CoC will coordinate and oversee the HPRP-funded activities of the subgrantees. These activities will require a standardized HMIS-compatible intake and assessment form for all subgrantees.

Criteria for Proposals:

Selection criteria will include: agency capacity; successful experience in homeless prevention and rapid re-housing; CoC participation; ability to manage subgrantees; housing search capabilities; ability to provide case management; outreach plan; use of a centralized or coordinated intake and assessment system; ability to develop a risk-assessment tool; capacity to track and document funding; and strong HMIS capability.

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:

DOH will allocate 73% of the funding for financial assistance and 27% for housing relocation and stabilization services. This reflects the tremendous need for financial assistance and is consistent with the legislation's intent. Approximately 42% of the funding will go to homelessness prevention, while 58% will go to re-housing activities. This allocation of funds was determined by analyzing how other states were allocating their funds and subsequently modified on the basis of public comment.

These are cost projections: DOH requests the opportunity to adjust cost allocations after the plan is implemented to ensure that the investment made by HUD has the maximum impact. DOH will allow sub-grantees to use either Prevention or Rapid Re-Housing funds depending on need, assessment and eligibility.

Process/Decision-Making Plan

- Executive Director (ED) of the Department of Local Affairs (DOLA) will approve the final HPRP Plan, including RFP process to select a grantee for each CoC.

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- The Colorado Community and Interagency Council on Homelessness (CICH) will serve as an Advisory committee to assist DOH in three areas: outreach, communication and education.
- The CICH, ED and the State Housing Board will jointly announce the availability of funds through the RFP process.
- DOH will provide general distribution criteria to its subgrantees.

Timeline:

April 2009	Collaboration with CICH and other stakeholders
May 6, 2009	Public Hearing on draft Amendment
May 18, 2009	Final Substantial Amendment due to HUD
May 19, 2009	Initiate RFP
July 1, 2009	Open RFP Responses
July 8, 2009	Awards
August 1, 2009	Contract
September 1, 2009	Funds distributed
September 2011	60% of funds expended
September 2012	100% of funds expended

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:

DOH intends to use the full grant amount made available in the HPRP notice in a timely, efficient and cost-effective manner.

The State of Colorado established an interagency workgroup to monitor the use of funding received through the American Recovery and Reinvestment Act to ensure compliance with federal regulations. DOH will submit copies of HUD's required quarterly reports to this workgroup through the Department of Local Affairs ARRA committee and will post all reports and updates on the ARRA website at the Department of Local Affairs. (<http://www.dola.state.co.us/arra/index.html>).

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DOH will integrate HPRP oversight and monitoring with the existing oversight and monitoring efforts for its Emergency Shelter Grants. Copies of all applicable federal rules and regulations for the program will be disseminated to grantees, along with materials to assist them with vouchering and reporting.

DOH will monitor all HPRP contracts throughout the term of the contract. The primary methods of monitoring include:

- * ongoing desk review of drawdown requests and backup documentation
- * review of quarterly Project Performance Plans (PPPs)
- * on-going email and telephone and technical assistance contact with program staff
- * periodic on-site monitoring (one site visits per contract)
- * review of year-end reports

DOH performs risk-based monitoring for all of its federal funds. A DOH asset manager will review subgrantee compliance with regulations, tracking of expenditures to ensure appropriate internal controls are in place and timely distribution of HPRP funds occurs.

DOH will appoint an in-house HPRP program manager to oversee funding and ensure timely and compliant expenditure of program funds by subgrantee agencies. DOH will monitor grantee draws to ensure that the draw-rate will meet the required expenditure timeframe. If a grantee does not meet required timeframes and benchmarks as specified in their contract, grantee's funds may be withdrawn and reallocated to another eligible agency.

Grantees must ensure that books, records, documents and other evidence pertaining to costs and expenses under the grant are adequately maintained. DOH has the legal right to directly access any records relevant to the project, including books, documents, photographs, correspondence and records needed to complete an audit. All records pertaining to the grant including financial audits, budgets, plans, drafts, supporting documents, statistical records, etc., must be retained for a period of a least five years following submission of the final expenditure report. If, there are any claims, audit findings, investigation or litigation, then records must be retained until the grantee resolves all claims or findings.

The contractual agreement requires grantees to submit a quarterly Project Performance Plan (PPP) that outlines required benchmarks and tracks subgrantee progress. The PPP will incorporate all federal reporting requirements that pertain to HPRP. The PPP also identifies significant obstacles in carrying out the contract obligations, along with plans to overcome these obstacles.

To meet HUD reporting requirements, subgrantee must track statistical data for the type of activity carried out, and the number of assisted individuals and families, racial/ethnic characteristics of the participants and other data necessary to comply with Homeless Management Information System (HMIS) standards.

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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:

Regional and/or metropolitan homeless prevention and rapid re-housing initiatives will be encouraged by the State of Colorado. Collaborative programs offering prevention and housing resources for homeless families and individuals will maximize the available resources and improve the efficiency of service delivery. These collaborative efforts will also provide a structure for targeting of other ARRA funding resources (TANF, Food Stamps, Medicaid, employment programs, etc.) to the families and individuals with the greatest needs. We will require our HPRP contractors to establish collaborative relationships with local workforce investment boards or county workforce centers, and encourage them to work with local law enforcement organizations, which may serve as a source of referrals.

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

Response:

The Colorado Department of Local Affairs, Division of Housing (DOH) has extensive collaborations with CoCs and mainstream resources through its existing grant-making programs and the Colorado Community and Interagency Council on Homelessness (CICH). DOH intends to award funds in a way that magnifies and enhances this collaboration.

DOH will inform the CoCs and the CICH about Requests for Proposals (RFPs) or application processes. DOH will require that grantee and any sub-recipients have ongoing participation with local CoC planning processes and that they develop protocols/MOUs with agencies that provide mainstream benefits, including Social Security SSI and SSDA, TANF Food Stamps Medicaid, SCHIP+, child care employment programs, health and other services.

As a member of the CICH, DOH will continue to coordinate and collaborate with the following organizations: Governor's Office; Social Security Administration; U.S. Department of Veterans' Affairs, Colorado Departments of Health Care Policy and Financing; Health and Environment; Human Services, Education; Labor; Corrections, Supportive Housing and Homeless Programs; local jurisdictions; homeless persons; and nonprofit homeless service agencies.

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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:

A seamless approach is the best way to serve those who are homeless or at-risk of homelessness. Colorado is working with the CICH, local jurisdictions, and homeless service agencies to develop coordinated intake systems. The State provides, through its Emergency Shelter Grant and Community Development Block Grant, services that keep homeless families stable and intact. The State's Consolidated Plan has listed permanent supportive and transitional housing for the homeless as a high priority for the last two years, and has awarded over \$1.7 million to create 106 units of such housing.

DOH expects its grantees to engage in all eligible activities of the Homeless Prevention and Rapid Re-housing Program (HPRP). To support the program, this Substantial Amendment to the State of Colorado 2008-2009 Consolidated Plan (Con Plan) will expand the types of activities in which the Division may engage or subgrant to ensure that homeless or at-risk households receive the appropriate level of assistance they need to achieve stability and independence.

The Con Plan already provides for tenant-based rental assistance (including case management and supportive services) targeted to low- and moderate-income households, with a preference for those who are already homeless. It also includes homeless prevention, financial assistance, essential services, motel and hotel vouchers and utility assistance. This substantial amendment will add moving cost assistance, housing placement and stabilization to the menu of support provided for people who are homeless or at imminent risk of homelessness.

By building upon ongoing collaborations with homeless program experts and practitioners, the State of Colorado will continue to move away from "old school" theories of ending homelessness and toward "Housing First" and "Rapid Re-entry" programs that provide a new paradigm for service to homeless families.

E. Estimated Budget Summary

HUD requires the grantee to complete the following table so that participants in the citizen participation process 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

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Financial Assistance ¹ (73%)	\$ 2,122,000	\$3,000,000	\$5,122,000
Housing Relocation and Stabilization Services ² (27%) Less Set Asides under Housing Relocation: Search Set Aside Outreach/Resource Guide TOTAL HOUSING RELOCATION		\$1,200,000 (\$ 60,000) (\$ 40,000) <u>(\$100,000)</u> \$1,100,000	
Subtotal (add previous two rows)	\$ 794,334 (42%)	\$ 4,100,000 (58%)	\$1,894,334
Data Collection and Evaluation ³	\$630,000*		\$ 630,000*
Administration (up to 5% of allocation)	\$407,702		\$ 407,702
Total HPRP Amount Budgeted⁴	\$ 8,154,036		\$ 8,154,036

* The State of Colorado will seek a waiver to acquire a functional HMIS system.

**See Attachment A: Supporting Budget Documents

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

Date

Executive Director, Colorado Department of Local Affairs
Title

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Attachment A: Supporting Budget Documents

STATE HPRP GRANT AWARD

HOMELESSNESS PREVENTION AND RAPID REHOUSING PROGRAM (HPRP)	
TOTAL GRANT AMOUNT	\$8,154,036

SET-ASIDES

ADMINISTRATION	STATE	SUBGRANTEE	SUBTOTAL	
	\$81,540	\$326,162	(\$407,702)	
HOUSING RESOURCE GUIDE - OUTREACH			(\$ 40,000)	
HMIS	SHORT-TERM IMPROVEMENTS – STATE SHARE	NEW SOFTWARE* VENDOR + AND RELATED COSTS STATE SHARE		
	\$30,000	\$600,000	(\$630,000)	
HOUSING SEARCH coloradohousingsearch.com			(\$ 60,000)	
SUBTOTAL ALL SET-ASIDES				(\$1,137,702)
TOTAL FOR DISTRIBUTION				\$7,016,334

* The State of Colorado will apply for a HUD Waiver to acquire a functional HMIS system. While support for the Homeless Management Information System (HMIS) is a part of this plan, the software currently utilized in Colorado to meet HMIS is inadequate for the needs of Colorado's CoCs. This plan includes short-term costs to meet current HMIS standards and required HPRP reports, but the State and other direct-HPRP jurisdictions in Colorado will seek HPRP waivers from HUD to purchase new HMIS software, license, customization, support, training and other necessary components that will help Colorado meet federal reporting regulations. Colorado Continuum of Care are also committed to partner and/or invest in HMIS so that all may comply with reporting requirements.

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Attachment B: Supporting Allocation Calculations

Weighting Factors : Percentages of State Unemployment, Foreclosures, Homelessness and Population by Continuum of Care

	Unemployed Persons 3/31/09	% of Total	Home Foreclosure Sales 2008	% of Total	Homeless Persons	% of Total	Population	% of Total	HPRP to Distribute*
Statewide Total	213899	100%	21306	100%	11844	100%	4,939,456	100%	\$7,016,334
MDHI	122061	57%	14580	68%	7772	66%	2,745,804	56%	
Pikes Peak	25616	12%	2169	10%	943	8%	596,053	12%	
BOS	66222	31%	4557	22%	3129	26%	1,597,599	32%	
	Unemployed Persons 3/31/09		Home Foreclosure Sales 2008		Homeless Persons*		Population		TOTALS
Weight	20%		20%		40%		20%		
MDHI	799,862		954,221		1,852,312		780,065		\$4,386,460
Pikes Peak	168,392		140,327		224,523		169,335		\$ 702,576
BOS	435,013		308,719		729,699		453,867		\$1,927,297
Totals	1,403,267		1,403,267		2,806,534		1,403,267		\$7,016,334

*\$7,016,334 represents the amount available for distribution after all set-asides, including \$40,000 and \$60,000 outreach and housing information services (see Attachment A).

**The number of homeless persons in each Continuum of Care was given a weight of 40% as opposed to 20% for each of the other factors as it best approximates the distribution of the core need that this funding is intended to meet.