

METROPOLITAN NASHVILLE-DAVIDSON COUNTY, TENNESSEE

GENERAL SECTION

**2017-2018 ANNUAL UPDATE TO
THE
2013-2018 CONSOLIDATED PLAN
FOR
HOUSING AND COMMUNITY DEVELOPMENT**

PROGRAM YEAR FIVE

For the period June 1, 2017 – May 31, 2018

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On Behalf of:

The Metropolitan Government of
Nashville and Davidson County

Updated June 2017



**2017-2018 Annual Update to the 2013-2018 Consolidated Plan
(2017 Action Plan) Program Year Five**

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(2017 Action Plan) Program Year Five**

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Executive Summary

AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

1. Introduction

Metropolitan Nashville and Davidson County (Metro Nashville) is located in Middle Tennessee and is the capital of the State of Tennessee. Metro Nashville has a consolidated city-county government that includes Nashville and several smaller municipalities and is the second largest city in Tennessee. As of the 2010 Census, the population of Davidson County, including all municipalities, was 626,681; the population was estimated to be 684,410 in 2016. The population of the Nashville-Davidson-Murfreesboro-Franklin metropolitan area was estimated at 1,589,934 in 2010 and at 1,865,298 in 2016 – making it the largest Metropolitan Statistical Area in the state and the 36th largest in the country

Metro Nashville is an entitlement community eligible to receive direct assistance under the U.S. Department of Housing and Urban Development's (HUD's) Community Development Block Grant (CDBG) program; a participating jurisdiction under the HOME Investment Partnerships Program (HOME); and a formula grantee under the Emergency Solutions Grant (ESG). Funds for these programs must be expended within Nashville-Davidson County for participants who meet applicable eligibility criteria and for eligible activities as outlined by program regulations. In addition, Metro Nashville is a formula grantee under the Housing Opportunities for Persons with AIDS (HOPWA) program; these funds target needs of persons living with HIV/AIDS and their families in the metropolitan area. Under Public Law 111-212, Metro Nashville received a one-time appropriation of CDBG Disaster Recovery (CDBG-DR) funds to assist with recovery efforts following the devastating flooding that occurred on May 1 and 2, 2010.

The Metropolitan Development and Housing Agency (MDHA) has been designated the lead agency responsible for the development and administration of the Consolidated Plan and CDBG Disaster Recovery Plan for Metro Nashville. Within MDHA, the Community Development Department is responsible for administering the Consolidated Plan programs – CDBG, HOME, ESG, and HOPWA – and CDBG DR programs. As the Consolidated Plan lead agency, the MDHA Community Development Department will lead the joint Assessment of Fair Housing (AFH) in 2017 on behalf of Metro Nashville and the MDHA public housing authority (PHA) operations. Goals and priorities identified in the AFH will be incorporated in the 2018-2024 Consolidated Plan (effective June 1, 2018) and 2019-2025 PHA Plan (effective October 1, 2019). Fair housing activities undertaken in this Action Plan are aimed to address impediments identified in the 2013 Analysis of Impediments to Fair Housing Choice.

Purpose of the Consolidated Plan and Annual Updates:

As a recipient of federal grant funds, MDHA is required by HUD to produce a five-year Consolidated Plan and an Annual Update (Action Plan) on behalf of Metro Nashville. These plans serve as the application for funding for the following federal programs:

- Community Development Block Grant (CDBG)
- HOME Investment Partnerships Act Program (HOME)
- Emergency Solutions Grant (ESG)
- Housing Opportunities for Persons with AIDS (HOPWA).

Metro Nashville's Consolidated Plan identifies the community's affordable housing, community development and economic development needs and outlines a comprehensive and coordinated strategy for addressing them. This document includes narrative responses to specific questions that grantees must answer in order to be compliant with the Consolidated Planning Regulations. The current Consolidated Plan, when originally approved, covered the period from April 1, 2013 to March 31, 2018. In December, 2016, HUD approved MDHA's request to change the 2017 Program Year start date to June 1, which effectively extends the period covered by the current Consolidated Plan to May 31, 2018. (See Exhibit 2.) In August 2013, MDHA prepared a Substantial Amendment 1 to the Consolidated Plan, which was approved by HUD in September 2013, to make significant budget revisions, add new activities, and revise the place-based strategy. In May 2016, MDHA prepared Substantial Amendment 2 to the Consolidated Plan, which was approved by HUD in July 2016, to allow ESG funds be used for homeless prevention.

The Consolidated Plan is updated each year (Annual Update) to reflect proposed activities and goals for the program year. As stated above, in December 2016 HUD approved a change in MDHA's program year from April 1 – March 31 to June 1 – May 30 to better coincide with HUD allocation funding and timeliness guidance. Thus, this Annual Update covers the period from June 1, 2017 to May 31, 2018 and constitutes Program Year Five. The allocations for the 2017 Program Year are shown in the table below:

2017 Formula Allocations	
CDBG	\$4,637,909
HOME	\$1,881,838
ESG	\$ 410,455
HOPWA	\$1,073,473
TOTAL	\$8,003,675

The Annual Update is due to HUD forty-five (45) days prior to the beginning of the program year, which for Metro Nashville, with the change in the program year, would be no later than April 14 of each year. However, as directed by HUD per CPD Notice 16-18

(See Exhibit 1), MDHA could not submit the Action Plan for HUD approval until actual allocations for 2017 were released by HUD. For the public comment period, the 2017 proposed budget for CDBG and HOME projects were expressed in terms of percentages (and the equivalent dollar amount) of the 2017 annual allocations to be budgeted to each planned activity. Once the final allocations were received from HUD, MDHA adjusted all CDBG and HOME activity budgets to reflect the same percentage of the actual allocations. The final allocations for 2017 ESG and HOPWA activities – other than those directly undertaken by MDHA staff – will be determined via Requests for Applications (RFA) process and demand for funding for projects, subject to regulatory caps.

2. Summarize the objectives and outcomes identified in the Plan

The priorities of the 2013-2018 Consolidated Plan were established after significant planning and public input and correlate to addressing impediments identified in the 2013 Analysis of Impediments to Fair Housing Choice.

Consolidated Plan Priorities	Impediments to Fair Housing Choice
<ol style="list-style-type: none"> 1. Increase the supply of affordable housing; 2. Strengthen collaboration among the network of service providers; 3. Increase access to healthy food choices; 4. Decrease homelessness; 5. Develop and implement place-based strategies for community development; 6. Provide summer programs for low- and moderate-income children and youth; 7. Provide housing assistance for persons with AIDS; and 8. Affirmatively Further Fair Housing. 	<ol style="list-style-type: none"> 1. Scarcity of affordable rental units; 2. Scarcity of housing units accessible to people with disabilities; 3. Lack of fair housing education, testing, and enforcement capacity; 4. Uneven distribution of community resources; and 5. Restriction on the expansion of protected classes.

Activities proposed to be undertaken this program year are intended to address the Consolidated Plan priorities and the primary objectives of the four Consolidated Plan programs: to develop viable urban communities by providing decent housing and a suitable living environment and expanding economic opportunities principally for low- and moderate-income persons. Related outcomes are increasing availability and accessibility, improving affordability, and promoting sustainability of communities. The primary means towards this end is to extend and strengthen partnerships at all levels of government and the private sector, including for-profit and nonprofit organizations, in the production and

operation of affordable housing and maximizing federal resources. The table below summarizes the proposed activities for addressing these objectives and outcomes. In addition, proposed activities are consistent with – to the greatest extent possible under Federal regulations – the recommendations of NashvilleNext and the Mayor’s 2016-2017 Housing Priorities and Action Plan. More information about each activity is available in Section AP-35.

OBJECTIVE 1: SUITABLE LIVING ENVIRONMENT	
Outcomes	Related Activities
<i>Availability/Accessibility</i>	<ul style="list-style-type: none"> • Emergency Shelter & Transitional Housing • Street Outreach • Rapid Re-Housing • Homeless Prevention • Housing Opportunities for Persons with AIDS • Services for the Homeless
<i>Sustainability</i>	<ul style="list-style-type: none"> • Infrastructure Improvements (Residential) • Neighborhood Facilities • Summer Youth Programs • Nonprofit Capacity Building • Planning Activities • Acquisition
OBJECTIVE 2: DECENT HOUSING	
Outcomes	Related Activities
<i>Affordability</i>	<ul style="list-style-type: none"> • Homeowner & Rental Rehabilitation • Affordable Housing Development • Downpayment Assistance
<i>Availability/Accessibility</i>	<ul style="list-style-type: none"> • Fair Housing
OBJECTIVE 3: ECONOMIC OPPORTUNITIES	
Outcomes	Related Activities
<i>Sustainability</i>	<ul style="list-style-type: none"> • Microenterprise Assistance • Commercial Rehab • Business Technical Assistance

3. Evaluation of past performance

Each year, MDHA reports its progress in meeting the five-year and annual goals in the Consolidated Annual Performance and Evaluation Report (CAPER). This report is required to be submitted to HUD within 90 days after the program year ends. A copy

of the CAPER is available on MDHA's website: <http://www.nashville-mdha.org/wp-content/uploads/2015/01/2015-2016-CAPER.pdf>. MDHA has consistently satisfied program mandates and has successfully targeted funds to benefit low- and moderate-income persons and neighborhoods. In its letter approving the 2015 CAPER, HUD determined that our overall progress is excellent and that activities appear to be in accordance with program requirements.

While the accomplishments reported in the CAPER are used to measure the success of meeting the goals for a program year, the evaluation of past performance is a continual process. For example, the quantity and quality of responses to funding opportunities indicate the demand for a particular activity, the capacity needs of an organization, and whether the expectations of MDHA and program requirements were communicated clearly. Results of audit/monitoring activities are used as management tools to strengthen MDHA and funding partners. Regular participation of MDHA staff in local forums, community meetings, and neighborhood events provide partners and citizens the opportunity to communicate needs, concerns, and ideas.

In May 2016, HUD conducted a monitoring review of the ESG grants which resulted in no findings or concerns.

4. Summary of Citizen Participation Process and consultation process

The Citizen Participation Plan in Substantial Amendment 1 to the 2013-2018 Consolidated Plan provides information on how citizens can become involved in the development, implementation and evaluation of housing and community development programs.

In developing the 2017 Action Plan, MDHA consulted with numerous partners, stakeholders, and local government officials on affordable housing and fair housing, non-housing community development, homelessness, and housing for persons with AIDS. Input from these consultations was incorporated to the extent possible into the 2017 Action Plan and is summarized in Appendix E.

The Public Comment Period for the 2017 Action Plan began on April 17, 2017 and concluded at 4:00 p.m. on May 19, 2017. During the public comment period, members of the public were invited to share their comments at two public hearings. Details regarding the public comment period and public hearings were provided in the Public Notice, which is included in Appendix F. The Public Notice was published in English and Spanish and advertised in *The Tennessean*, *The Tribune*, and *El Crucero*; emailed to over 300 citizens, partners, and community groups whose emails are on file with MDHA; sent to the Mayor's Office, Vice Mayor Briley, and Members of Metro Council; and posted on MDHA's website and social media outlets and at MDHA properties. The public hearing scheduled for 5:30 p.m. on May 9th was televised multiple times on the local government access channel, Metro 3, and made available on Metro's YouTube channel.

5. Summary of public comments

A summary of comments made at the public hearings and submitted in writing during the comment period, as well as MDHA's responses, are provided in Appendix G.

6. Summary of comments or views not accepted and the reasons for not accepting them

A summary of comments or views not accepted and the reasons for not accepting them are provided in Appendix G.

7. Summary

This 2017 Action Plan identifies Metro Nashville's affordable housing, community development and economic development needs and outlines a comprehensive and coordinated strategy for addressing them during the 2017-2018 Program Year. Using CDBG, HOME, ESG and HOPWA funds and by leveraging other public and private investment, MDHA will work to:

1. Increase the supply of affordable housing;
2. Strengthen collaboration among the network of service providers;
3. Increase access to healthy food choices;
4. Decrease homelessness;
5. Develop and implement place-based strategies for community development;
6. Provide summer programs for low- and moderate-income children and youth;
7. Provide housing assistance for persons with AIDS; and
8. Affirmatively Further Fair Housing.

The specific activities to be undertaken this program year further these priorities, as well as address impediments to fair housing choice.

PR-05 Lead & Responsible Agencies – 91.200(b)

1. Agency/entity responsible for preparing/administering the Consolidated Plan

Describe the agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
Consolidated Plan Lead Agency	Nashville-Davidson	MDHA Community Development Department
CDBG Administrator	Nashville-Davidson	MDHA Community Development Department
HOPWA Administrator	Nashville-Davidson	MDHA Community Development Department
HOME Administrator	Nashville-Davidson	MDHA Community Development Department
ESG Administrator	Nashville-Davidson	MDHA Community Development Department

Table 1 – Responsible Agencies

Narrative (optional)

MDHA has been designated as the lead agency for the preparation and administration of the Consolidated Plan and annual updates, as well as annual reports on Consolidated Plan activities. Within MDHA, the Community Development Department prepared the 2017 Annual Action Plan for public comment after consultation with various stakeholders and ultimately for submittal to HUD. The mission of MDHA is to create affordable housing opportunities, support neighborhoods, strengthen communities, and help build a greater downtown. MDHA has the capacity and demonstrated ability to effectively and successfully administer these programs.

Consolidated Plan Public Contact Information

Public comments regarding the 2017 Action Plan should be directed as follows and submitted or postmarked by 4:00 p.m., central time, on Friday, May 19, 2017:

- By mail: MDHA Community Development Department
Attn: Consolidated Plan
P. O. Box 846
Nashville, TN 37202
- Electronically: consolidatedplan@nashville-mdha.org
Subject: Consolidated Plan
- By fax: (615) 252-8533
Attn: Consolidated Plan
- Hand delivery: MDHA Community Development Department
Attn: Consolidated Plan
712 South Sixth Street
Nashville, TN 37206

Other inquiries about the Consolidated Plan or housing and community development programs should be directed to:

Angela Hubbard, Director of Community Development
Metropolitan Development and Housing Agency
712 South Sixth St. Nashville, TN 37206 (615) 252-8505
ahubbard@nashville-mdha.org.

AP-10 Consultation – 91.100, 91.200(b), 91.215(l)

1. Introduction

MDHA recognizes the value of its relationships with public and private entities to

effectively implement the strategies and related activities in the Consolidated Plan and annual updates. Moreover, one of the priorities of the Consolidated Plan is to “strengthen collaboration among the network of service providers”. Throughout the year, MDHA staff participates in many affordable housing and community development forums and local planning efforts along with many of our partners.

In preparing the 2017 Action Plan, MDHA consulted with numerous partners, stakeholders, and local government officials on affordable housing and fair housing, non-housing community development, and homelessness and housing for persons with AIDS. The purpose of these consultations was to review Consolidated Plan priorities and assess the impact of activities to address these priorities and gather input for the 2017 Action Plan.

Provide a concise summary of the jurisdiction’s activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(I))

During the consultation with stakeholders on homelessness and housing for persons with AIDS, participants were specifically asked to rate the level of coordination among the Continuum of Care (CoC); housing providers; health, mental health and services agencies and to provide recommendations on improving coordination. A summary is included in Appendix E. This input helps to identify weaknesses in the system and areas of opportunity.

A division of the Metro Social Services Department, the Metro Homelessness Commission (MHC) is comprised of 15 voting members, including advocates, persons who have experienced homelessness, and elected officials, as well as representatives of 7 Metro-related departments that serve as ex-officio members: Metro Social Services Commission, MDHA, Metro Public Health Department, Nashville Career Advancement Center, Metropolitan Action Commission, and the Metro Police Department. The purpose of the MHC is to collaborate with community partners to prevent and end homelessness. In doing so, the MHC leads efforts that create, implement, fund, and advocate for programs and policies that generate measurable results and lead to a clear, 30-day path out of homelessness that provides housing stability for individuals and families. The public response to homelessness is further coordinated by Nashville Mayor Barry’s Inter-Departmental Council, which includes representatives from various departments of the metropolitan government and focuses on a coordinated Metro response to literal homelessness.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.

MDHA serves as the Collaborative Applicant and HMIS (Homeless Management Information System) Lead for the Nashville-Davidson County CoC. As the Collaborative Applicant, MDHA staff coordinates the submission of over 25 local project applications

each year for the annual competition, as well as prepares the extensive CoC narrative for submission into HUD's e-snaps system. MDHA provides technical assistance to applicant agencies and coordinates monthly meetings of the Continuum of Care which comprises service providers including homeless shelters, mental health centers, veterans' services, educational institutions, and housing assistance providers. Continuum of Care agendas are focused on enhanced coordination among all entities and gauging housing and income stability measures of CoC-funded programs.

To coordinate services for families with children, the CoC relies on several local shelter agencies, particularly Safe Haven Family Shelter, a center of planning for coordinated entry into and out of Nashville's homeless service system.

The local continuum of housing and supports for homeless veterans and their families has been bolstered substantially, with additional VASH rent subsidies and case management, and enhanced re-housing assistance through new SSVF grants to two local agencies. Working with local agency partners like Centerstone & the VA, Nashville's Metropolitan Homelessness Commission spearheaded the Development of the *SSVF Priority 1 Community Plan*, revised in December 2014. Shelter and other frontline staff have been using a common assessment tool called the VI-SPDAT since February 2014 to identify and prioritize veterans and non-veterans for permanent housing. Staff also completed a 2-hour "housing navigation" training that outlines processes to connect people experiencing homelessness to housing and support service resources. These efforts have led to enhanced coordination, data sharing, and prioritization among providers. Metro Nashville is participating in the Mayor's Challenge to End Veteran's Homelessness and the Zero: 2016 Campaign; and the lead homeless assistance agencies (MDHA, MHC, and a representative from the Mayor's Office) meet at least semi-annually with the Nashville HUD Field Office Director to discuss the City's progress on ending Veteran's homelessness. Since January 2015, community partners in Nashville have worked together to house 447 homeless veterans. In the Spring of 2017, MDHA partnered with the Mayor's Office to create an incentive program for landlords participating in the VASH program.

Transition planning is required by Tennessee's Department of Children's Services to begin at age 17 to ensure that older youth aging out of foster care develop specific action steps to address housing, job training, continued education, and other community supports. Oasis Center is a primary player in the CoC and receives ESG funds to support emergency shelter beds for unaccompanied youth. This agency runs Nashville's only Youth Crisis Center, and assisted with the city's 2016 Point-in-Time (PIT) count by hosting a magnet event for at-risk, homeless and runaway youth. Dr. Jama Shelton, with the True Colors fund (raising awareness about and bringing an end to gay, lesbian, bisexual, and transgender youth homelessness), acted as consultant for marketing this youth portion of Nashville's 2016 PIT count.

The Nashville Continuum of Care (CoC) is making progress toward preventing and ending youth homelessness by developing a comprehensive system of care for young people rather than implementing individual or unconnected projects that serve this population. The Nashville CoC is collaborating with more than 30 organizations to develop an innovative and coordinated community approach to prevent and end youth homelessness specifically addressing unaccompanied youth, pregnant or parenting homeless youth, and youth at risk of homelessness.

These 30 organizations represent a broad cross sector of key stakeholders that serve the following homeless subpopulations or community services: veterans; Lesbian, Gay, Bisexual, Transgender, and Questioning (LGBTQ); domestic violence; emergency shelters; transitional housing; chronic homelessness; mental health; universities; justice; and public schools. Many of these organizations were integrally involved in the creation of the June 2016 **Key Action Plan - Opening Doors for Youth and Young Adults Experiencing Homelessness**. The plan outlines action steps that serve as a starting point for our community to address youth homelessness in Nashville.

These efforts are leading to the design of better projects and strong comprehensive plans to prevent and end youth homelessness. The Nashville CoC applied for a federal grant to support the planning and implementation of the Youth Homelessness Plan but was unsuccessful; rather, HUD awarded the Nashville CoC 32 hours of technical assistance to continue to the momentum and progress of the Youth Homelessness Plan. HUD also offered other opportunities to support the Youth Homelessness Plan such as a 100-Day Challenge.

To strengthen the City's efforts to address and end homelessness, MHC, MDHA, and the Frist Foundation engaged Focus Strategies to assess the current homeless system and make recommendations for improving our efforts. The final report was released in the spring of 2016. Its recommendations for developing a housing crisis resolution system and streamlining governance and planning are being considered. To assist with this discussion, HUD provided technical assistance via The Cloudburst Group, which began working with the CoC in November 2016. Since then, Cloudburst has facilitated honest and robust conversation around strengthening the Nashville Continuum of Care's ability to coordinate housing, services, and funding streams by:

- Developing a plan for meeting goals for ending and preventing homelessness
- Focusing on SYSTEM performance rather than project performance
- Increasing collaboration with ESG recipients
- Establishing optimal CoC governance structures.

This technical assistance is ongoing and is expected to last through the summer of 2017.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for

and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS.

In addition to serving as the CoC Collaborative Applicant and HMIS Lead, MDHA is responsible for the administration of the ESG program on behalf of Metro Nashville. In the consultation on homelessness described in Section AP-10, agencies receiving ESG funding and other stakeholders were solicited for critical feedback on the Plan for allocating ESG funds in Nashville in preparation for the city's 2017 formula funding. In particular, participants were asked to prioritize activities to address homelessness and subpopulations to be served by homeless assistance programs.

With two decades of compiling and submitting the CoC application and over eight years operating the city's HMIS, MDHA has extensive experience with two key CoC responsibilities: (1) as Collaborative Applicant, MDHA applied for 2016 CoC Planning funds to take the city to the next level, by formalizing local CoC processes, enhancing coordination of local planning efforts as well as varied homeless funding streams, and (2) setting performance measures for the community rather than solely for individual projects. A matrix has been developed to identify standards for ESG recipients to gauge the quality of data for reported performance outcomes. See pages 127-128 for more information. Using metrics listed below, MDHA will create reports to show how rates of access to income/financial supports and housing stability compare from 2018 back to 2017 and 2016, on both a subrecipient and a community/system level. In the next year MDHA will examine performance targets for both ESG and CoC to better detect how agencies can best align these two programs. In addition, MDHA will seek input from MHC staff on the development of funding opportunities to extend collection data on homeless persons sleeping in emergency shelters such as the Nashville Rescue Mission, and persons experiencing homelessness encountered by outreach workers funded by PATH at the Mental Health Cooperative.

In early December 2016, MDHA invited local ESG subrecipients to meet and discuss performance targets for the system as a whole. Stakeholders designed target percentages for improving indicators such as:

- Length of stay
- Placement into permanent housing
- Housing retention for rapid re-housing
- Outreach contacts and placement by outreach workers into safer environments

MDHA will gather these players again in the spring of 2017 to review actual performance against these goals.

In 2013, MDHA's HMIS Coordinator worked with HMIS leads across the state to develop a Policies and Procedures manual that guides local HMIS implementation. The quality of data in the HMIS has improved dramatically in the past three years and has resulted in demographic and programmatic data that is now extremely accurate and,

thereby, able to demonstrate and verify the performance of the CoC's 25 transitional and permanent housing projects. During 2017, MDHA will work to integrate HMIS data with data required by HHS for homeless youth (RHYMIS) and train staff at the Mental Health Cooperative to begin entering data on persons struggling with chronic mental illness who are served with outreach services through federal PATH funds.

2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdiction's consultations with housing, social service agencies and other entities.

To gather input for the 2017 Action Plan, MDHA held consultations on the following topics: affordable housing and fair housing, non-housing community development, and homelessness and housing for persons with AIDS. Partners, stakeholders, advocates, and government officials were invited. A summary of the responses from the consultation is provided in Appendix E.

- *Affordable housing and fair housing consultation:* Held on October 28, 2016, participants were invited to a Brown Bag lunch at which MDHA provided an overview of activities to address these needs during the current program year and eligible uses of CDBG and HOME funds to create and preserve affordable housing and affirmatively further fair housing. Participants were asked to identify barriers to affordable housing; prioritize activities to address affordable housing; prioritize subpopulations to be served by affordable housing programs; prioritize areas where funds for housing should be targeted; and provide suggestions for improving fair housing education.

Participants included representatives from affordable housing advocates; housing developers/providers some which are certified as Community Housing Development Organizations (CHDOs); realtors; and non-profit service providers.

- *Non-housing community development consultation:* Held on the evening of September 16, 2016, MDHA provided an overview of activities to address these needs during the current program year and eligible uses of CDBG funds. Participants were asked to list the top three barriers to reducing poverty; prioritize non-housing community development needs; list the top three specific non-housing community development activities; select locations where CDBG funds should be targeted; and select a preference between housing or non-housing for the use of CDBG funds.

Participants included at-large community members/leaders; Metro Arts Commission, Neighborhoods Resource Center, First Tennessee Bank, and local realtors.

- Consultation on needs of public housing residents: Because MDHA is the Public Housing Authority for Nashville there is close collaboration as all Department Directors, including those from Community Development, Asset Management/Affordable Housing and Rental Assistance meet weekly to discuss agency programs and activities. As a result, Community Development staff are aware of the needs of public housing residents and PHA staff are familiar with the CDBG-funded activities that meet the needs of their residents. Recently, specific discussion points included how youth being hired through MDHA as summer interns to work with public housing residents could fit within the parameters of the Mayor's "Opportunity NOW" initiative to provide project-based career experiences for young people 14-15 years old. Additional discussion points included the following: supply and condition of public housing; needs of public housing tenants and applicants on the waiting list for accessible units; most immediate needs of public housing residents and housing choice voucher holders (i.e., transportation, access to healthy food, etc.); restoration and revitalization needs and plans to address these needs; strategy for improving the living environment; and activities to increase resident involvement in management of public housing and to participate in homeownership.

Additional general discussion points included the following: perceived barriers to affordable housing and actions to remove these or mitigate the effects of public policies that create these barriers; obstacles to meeting underserved needs and actions to overcoming them; actions that will preserve affordable housing units that may be lost from the assisted housing inventory; efforts to reduce the number of poverty-level families; and coordination with social services or other public agencies.

- Homelessness and housing for persons with AIDS consultation: Held on September 15, 2016, MDHA provided an overview of activities to address these needs during the current program year and eligible uses of ESG and HOPWA funds at the monthly Continuum of Care (CoC) general meeting held at the Nashville Rescue Mission. Participants were asked to prioritize activities to address homelessness; prioritize sub-populations to be served by homeless assistance programs; prioritize activities to address housing to persons with HIV; list top three barriers to affordable housing for persons/families that are homeless or are at-risk of homelessness; list top three barriers to affordable housing for persons with HIV and their families; describe level of coordination for addressing homelessness among the CoC, housing providers; health, mental health and service agencies, and state and local government agencies and to provide one (1) recommendation for increasing coordination among these agencies; and to rate discharge coordination procedures between the following populations: youth aging from foster care/state custody; persons discharged from health care and mental health facilities; and persons discharged from correctional programs and institutions.

Participants included representatives from the Metropolitan Homelessness Commission, the CoC members and subrecipients of ESG and HOPWA funds.

- ***Consultation with metro government agencies:*** MDHA attended a meeting at the Mayor’s office on September 8, 2016 with representatives from the Mayor’s offices of Economic and Community Development (ECD); Economic Opportunity and Empowerment (EOE); Neighborhoods and Community Engagement (NCE); and Infrastructure, Transportation, and Sustainability; and the Youth Policy Consultant to provide an overview of the activities funded under the 2016 Action Plan and obtain their input on program priorities for 2017. There were approximately 15 representatives in attendance. The following topics were discussed: economic development; microenterprise programs; summer youth programs and youth employment programs; affordable Housing options; and public improvements/infrastructure needs.

Since the September 8 meeting, MDHA staff has had on-going dialogue with the Mayor’s Infrastructure Team, OEOE, ONCE, and MHC to coordinate on proposed activity budgets to align with the City’s initiatives. MDHA plans to hold additional consultations with metro government agencies after final grant allocations are received from HUD.

Input received from all the consultations and meetings were considered when formulating funding priorities for the 2017 Action Plan.

1	Agency/Group/Organization	MDHA
	Agency/Group/Organization Type	PHA
	What section of the Plan was addressed by Consultation?	All
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Prior to drafting the 2017 Annual Action Plan, MDHA consulted with stakeholders to obtain their input on developing the Plan. These consultations covered the following topics: Homelessness and Housing for Persons with Aids; Affordable Housing and Affirmatively Furthering Fair Housing; and Non-Housing Community Development Needs. Further descriptions of the meetings are detailed in the summary of this section above.
2	Agency/Group/Organization	Metro Homelessness Commission
	Agency/Group/Organization Type	Other Government-Local

	What section of the Plan was addressed by Consultation?	Anti-Poverty Strategy Public Housing Needs Homelessness Needs Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Prior to drafting the 2017 Annual Action Plan, MDHA consulted with stakeholders to obtain their input on developing the Plan. These consultations covered the following topics: Homelessness and Housing for Persons with Aids; Affordable Housing and Affirmatively Furthering Fair Housing; and Non-Housing Community Development Needs. Further descriptions of the meetings are detailed in the summary of this section above.
3	Agency/Group/Organization	Mayor's Infrastructure Team
	Agency/Group/Organization Type	Other government – Local
	What section of the Plan was addressed by Consultation?	Public Housing Needs Housing Needs Assessment Other-Non-Housing Community Development Needs Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Prior to drafting the 2017 Annual Action Plan, MDHA consulted with stakeholders to obtain their input on developing the Plan. These consultations covered the following topics: Homelessness and Housing for Persons with Aids; Affordable Housing and Affirmatively Furthering Fair Housing; and Non-Housing Community Development Needs. Further descriptions of the meetings are detailed in the summary of this section above.
4	Agency/Group/Organization	Metro Social Services
	Agency/Group/Organization Type	Other Government - Local
	What section of the Plan was addressed by Consultation?	Other-Non-Housing Community Development Needs Economic Development Homelessness Needs Public Housing Needs

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Prior to drafting the 2017 Annual Action Plan, MDHA consulted with stakeholders to obtain their input on developing the Plan. These consultations covered the following topics: Homelessness and Housing for Persons with Aids; Affordable Housing and Affirmatively Furthering Fair Housing; and Non-Housing Community Development Needs. Further descriptions of the meetings are detailed in the summary of this section above.
5	Agency/Group/Organization	Nashville CARES
	Agency/Group/Organization Type	Services-Persons with HIV/AIDS
	What section of the Plan was addressed by Consultation?	HOPWA Strategy Homelessness Needs Public Housing Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Prior to drafting the 2017 Annual Action Plan, MDHA consulted with stakeholders to obtain their input on developing the Plan. These consultations covered the following topics: Homelessness and Housing for Persons with Aids; Affordable Housing and Affirmatively Furthering Fair Housing; and Non-Housing Community Development Needs. Further descriptions of the meetings are detailed in the summary of this section above.
6	Agency/Group/Organization	Opportunity NOW
	Agency/Group/Organization Type	Services-Education
	What section of the Plan was addressed by Consultation?	Other-Non-Housing Community Development Needs Economic Development Youth Services

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Prior to drafting the 2017 Annual Action Plan, MDHA consulted with stakeholders to obtain their input on developing the Plan. These consultations covered the following topics: Homelessness and Housing for Persons with Aids; Affordable Housing and Affirmatively Furthering Fair Housing; and Non-Housing Community Development Needs. Further descriptions of the meetings are detailed in the summary of this section above.
7	Agency/Group/Organization	New Level Community Development
	Agency/Group/Organization Type	Housing Services-Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Prior to drafting the 2017 Annual Action Plan, MDHA consulted with stakeholders to obtain their input on developing the Plan. These consultations covered the following topics: Homelessness and Housing for Persons with Aids; Affordable Housing and Affirmatively Furthering Fair Housing; and Non-Housing Community Development Needs. Further descriptions of the meetings are detailed in the summary of this section above.
8	Agency/Group/Organization	Catholic Charities FEP
	Agency/Group/Organization Type	Other – Religious Organization
	What section of the Plan was addressed by Consultation?	Public Housing Needs Housing Needs Services-Housing

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Prior to drafting the 2017 Annual Action Plan, MDHA consulted with stakeholders to obtain their input on developing the Plan. These consultations covered the following topics: Homelessness and Housing for Persons with Aids; Affordable Housing and Affirmatively Furthering Fair Housing; and Non-Housing Community Development Needs. Further descriptions of the meetings are detailed in the summary of this section above.
9	Agency/Group/Organization	Mayor's Office -Department of Transportation and Sustainability
	Agency/Group/Organization Type	Other Government - Local
	What section of the Plan was addressed by Consultation?	Other-Non-Housing Community Development Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Prior to drafting the 2017 Annual Action Plan, MDHA consulted with stakeholders to obtain their input on developing the Plan. These consultations covered the following topics: Homelessness and Housing for Persons with Aids; Affordable Housing and Affirmatively Furthering Fair Housing; and Non-Housing Community Development Needs. Further descriptions of the meetings are detailed in the summary of this section above.
10	Agency/Group/Organization	The Next Door
	Agency/Group/Organization Type	Services-homeless
	What section of the Plan was addressed by Consultation?	Homelessness Needs Homelessness Strategy

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Prior to drafting the 2017 Annual Action Plan, MDHA consulted with stakeholders to obtain their input on developing the Plan. These consultations covered the following topics: Homelessness and Housing for Persons with Aids; Affordable Housing and Affirmatively Furthering Fair Housing; and Non-Housing Community Development Needs. Further descriptions of the meetings are detailed in the summary of this section above.
11	Agency/Group/Organization	Volunteers of America Middle TN
	Agency/Group/Organization Type	Services- Persons w/ Disabilities Services-Homeless
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homelessness Needs - Veterans
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Prior to drafting the 2017 Annual Action Plan, MDHA consulted with stakeholders to obtain their input on developing the Plan. These consultations covered the following topics: Homelessness and Housing for Persons with Aids; Affordable Housing and Affirmatively Furthering Fair Housing; and Non-Housing Community Development Needs. Further descriptions of the meetings are detailed in the summary of this section above.
12	Agency/Group/Organization	YWCA
	Agency/Group/Organization Type	Services – Homeless Services – Victims of Domestic Violence
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homelessness Needs – Victims of Domestic Violence

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Prior to drafting the 2017 Annual Action Plan, MDHA consulted with stakeholders to obtain their input on developing the Plan. These consultations covered the following topics: Homelessness and Housing for Persons with Aids; Affordable Housing and Affirmatively Furthering Fair Housing; and Non-Housing Community Development Needs. Further descriptions of the meetings are detailed in the summary of this section above.
13	Agency/Group/Organization	Room in the Inn
	Agency/Group/Organization Type	Services - Homeless
	What section of the Plan was addressed by Consultation?	Homelessness Needs Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Prior to drafting the 2017 Annual Action Plan, MDHA consulted with stakeholders to obtain their input on developing the Plan. These consultations covered the following topics: Homelessness and Housing for Persons with Aids; Affordable Housing and Affirmatively Furthering Fair Housing; and Non-Housing Community Development Needs. Further descriptions of the meetings are detailed in the summary of this section above.
14	Agency/Group/Organization	Nashville Rise
	Agency/Group/Organization Type	Civic Leaders
	What section of the Plan was addressed by Consultation?	Non-Housing Community Development Needs Economic Development

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Prior to drafting the 2017 Annual Action Plan, MDHA consulted with stakeholders to obtain their input on developing the Plan. These consultations covered the following topics: Homelessness and Housing for Persons with Aids; Affordable Housing and Affirmatively Furthering Fair Housing; and Non-Housing Community Development Needs. Further descriptions of the meetings are detailed in the summary of this section above.
15	Agency/Group/Organization	Neighborhoods Resource Center
	Agency/Group/Organization Type	Neighborhood Organization
	What section of the Plan was addressed by Consultation?	Non-Housing Community Development Needs Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Prior to drafting the 2017 Annual Action Plan, MDHA consulted with stakeholders to obtain their input on developing the Plan. These consultations covered the following topics: Homelessness and Housing for Persons with Aids; Affordable Housing and Affirmatively Furthering Fair Housing; and Non-Housing Community Development Needs. Further descriptions of the meetings are detailed in the summary of this section above.
16	Agency/Group/Organization	Be a Helping Hand Foundation
	Agency/Group/Organization Type	Housing Services - Housing
	What section of the Plan was addressed by Consultation?	Public Housing Needs Housing Needs Assessment

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Prior to drafting the 2017 Annual Action Plan, MDHA consulted with stakeholders to obtain their input on developing the Plan. These consultations covered the following topics: Homelessness and Housing for Persons with Aids; Affordable Housing and Affirmatively Furthering Fair Housing; and Non-Housing Community Development Needs. Further descriptions of the meetings are detailed in the summary of this section above.
17	Agency/Group/Organization	Metro Arts Commission
	Agency/Group/Organization Type	Other Government-Local
	What section of the Plan was addressed by Consultation?	Other-Non-Housing Community Development Needs Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Prior to drafting the 2017 Annual Action Plan, MDHA consulted with stakeholders to obtain their input on developing the Plan. These consultations covered the following topics: Homelessness and Housing for Persons with Aids; Affordable Housing and Affirmatively Furthering Fair Housing; and Non-Housing Community Development Needs. Further descriptions of the meetings are detailed in the summary of this section above.
18	Agency/Group/Organization	Park Center
	Agency/Group/Organization Type	Services – Homeless
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homelessness Strategy Homelessness Needs

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Prior to drafting the 2017 Annual Action Plan, MDHA consulted with stakeholders to obtain their input on developing the Plan. These consultations covered the following topics: Homelessness and Housing for Persons with Aids; Affordable Housing and Affirmatively Furthering Fair Housing; and Non-Housing Community Development Needs. Further descriptions of the meetings are detailed in the summary of this section above.
19	Agency/Group/Organization	Mayor's Office of Economic and Community Development
	Agency/Group/Organization Type	Other Government-Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Economic Development Other-Non-Housing Community Development Needs Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Prior to drafting the 2017 Annual Action Plan, MDHA consulted with stakeholders to obtain their input on developing the Plan. These consultations covered the following topics: Homelessness and Housing for Persons with Aids; Affordable Housing and Affirmatively Furthering Fair Housing; and Non-Housing Community Development Needs. Further descriptions of the meetings are detailed in the summary of this section above.
20	Agency/Group/Organization	Mayor's Office of Economic Opportunity And Empowerment
	Agency/Group/Organization Type	Other Government-Local
	What section of the Plan was addressed by Consultation	Housing Need Assessment Public Housing Needs Economic Development Other-Non-Housing Community Development Needs Homelessness Strategy

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Prior to drafting the 2017 Annual Action Plan, MDHA consulted with stakeholders to obtain their input on developing the Plan. These consultations covered the following topics: Homelessness and Housing for Persons with Aids; Affordable Housing and Affirmatively Furthering Fair Housing; and Non-Housing Community Development Needs. Further descriptions of the meetings are detailed in the summary of this section above.
21	Agency/Group/Organization	Mayor's Office of Neighborhoods and Community Engagement
	Agency/Group/Organization	Other Government-Local
	What section of the Plan was addressed by Consultation	Housing Need Assessment Public Housing Needs Economic Development Other-Non-Housing Community Development Needs Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Prior to drafting the 2017 Annual Action Plan, MDHA consulted with stakeholders to obtain their input on developing the Plan. These consultations covered the following topics: Homelessness and Housing for Persons with Aids; Affordable Housing and Affirmatively Furthering Fair Housing; and Non-Housing Community Development Needs. Further descriptions of the meetings are detailed in the summary of this section above.
22	Agency/Group/Organization	Armor Realty, LLC.
	Agency/Group/Organization Type	Housing Business Leaders
	What section of the Plan was addressed by Consultation?	Non-Housing Community Development Strategy Economic Development Strategy

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Prior to drafting the 2017 Annual Action Plan, MDHA consulted with stakeholders to obtain their input on developing the Plan. These consultations covered the following topics: Homelessness and Housing for Persons with Aids; Affordable Housing and Affirmatively Furthering Fair Housing; and Non-Housing Community Development Needs. Further descriptions of the meetings are detailed in the summary of this section above.
23	Agency/Group/Organization	First Tennessee Bank
	Agency/Group/Organization Type	Private Sector Banking/Financing
	What section of the Plan was addressed by Consultation?	Non-housing Community Development Strategy Economic Development Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Prior to drafting the 2017 Annual Action Plan, MDHA consulted with stakeholders to obtain their input on developing the Plan. These consultations covered the following topics: Homelessness and Housing for Persons with Aids; Affordable Housing and Affirmatively Furthering Fair Housing; and Non-Housing Community Development Needs. Further descriptions of the meetings are detailed in the summary of this section above.
24	Agency/Group/Organization	Urban Housing Solutions
	Agency/Group/Organization Type	Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs HOPWA Strategy

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Prior to drafting the 2017 Annual Action Plan, MDHA consulted with stakeholders to obtain their input on developing the Plan. These consultations covered the following topics: Homelessness and Housing for Persons with Aids; Affordable Housing and Affirmatively Furthering Fair Housing; and Non-Housing Community Development Needs. Further descriptions of the meetings are detailed in the summary of this section above.
25	Agency/Group/Organization	The Housing Fund
	Agency/Group/Organization Type	Community Development Financial Institution
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Prior to drafting the 2017 Annual Action Plan, MDHA consulted with stakeholders to obtain their input on developing the Plan. These consultations covered the following topics: Homelessness and Housing for Persons with Aids; Affordable Housing and Affirmatively Furthering Fair Housing; and Non-Housing Community Development Needs. Further descriptions of the meetings are detailed in the summary of this section above.
26	Agency/Group/Organization	Mary Parrish Center
	Agency/Group/Organization Type	Services – Homeless Services – Victims of Domestic Violence
	What section of the Plan was addressed by Consultation?	Homelessness Needs – Victims of Domestic Violence Homelessness Strategy

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Prior to drafting the 2017 Annual Action Plan, MDHA consulted with stakeholders to obtain their input on developing the Plan. These consultations covered the following topics: Homelessness and Housing for Persons with Aids; Affordable Housing and Affirmatively Furthering Fair Housing; and Non-Housing Community Development Needs. Further descriptions of the meetings are detailed in the summary of this section above.
27	Agency/Group/Organization	Nashville Downtown Partnership
	Agency/Group/Organization Type	Services-Homeless
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homelessness Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Prior to drafting the 2017 Annual Action Plan, MDHA consulted with stakeholders to obtain their input on developing the Plan. These consultations covered the following topics: Homelessness and Housing for Persons with Aids; Affordable Housing and Affirmatively Furthering Fair Housing; and Non-Housing Community Development Needs. Further descriptions of the meetings are detailed in the summary of this section above.
28	Agency/Group/Organization	First Response Center
	Agency/Group/Organization Type	Services – Persons w/ HIV/AIDS Services – Homeless
	What section of the Plan was addressed by Consultation?	HOPWA Strategy Homelessness Strategy

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Prior to drafting the 2017 Annual Action Plan, MDHA consulted with stakeholders to obtain their input on developing the Plan. These consultations covered the following topics: Homelessness and Housing for Persons with Aids; Affordable Housing and Affirmatively Furthering Fair Housing; and Non-Housing Community Development Needs. Further descriptions of the meetings are detailed in the summary of this section above.
29	Agency/Group/Organization	The Salvation Army
	Agency/Group/Organization Type	Services - Homeless
	What section of the Plan was addressed by Consultation?	Homelessness Needs Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Prior to drafting the 2017 Annual Action Plan, MDHA consulted with stakeholders to obtain their input on developing the Plan. These consultations covered the following topics: Homelessness and Housing for Persons with Aids; Affordable Housing and Affirmatively Furthering Fair Housing; and Non-Housing Community Development Needs. Further descriptions of the meetings are detailed in the summary of this section above.
30	Agency/Group/Organization	Meharry Medical Center
	Agency/Group/Organization Type	Services – Persons w/ HIV/AIDS
	What section of the Plan was addressed by Consultation?	HOPWA Strategy Homeless Needs-Persons with HIV/AIDS

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Prior to drafting the 2017 Annual Action Plan, MDHA consulted with stakeholders to obtain their input on developing the Plan. These consultations covered the following topics: Homelessness and Housing for Persons with Aids; Affordable Housing and Affirmatively Furthering Fair Housing; and Non-Housing Community Development Needs. Further descriptions of the meetings are detailed in the summary of this section above.
31	Agency/Group/Organization	Renewal House
	Agency/Group/Organization Type	Services - Homeless
	What section of the Plan was addressed by Consultation?	Homeless Needs - Families and Children Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Prior to drafting the 2017 Annual Action Plan, MDHA consulted with stakeholders to obtain their input on developing the Plan. These consultations covered the following topics: Homelessness and Housing for Persons with Aids; Affordable Housing and Affirmatively Furthering Fair Housing; and Non-Housing Community Development Needs. Further descriptions of the meetings are detailed in the summary of this section above.
32	Agency/Group/Organization	Safe Haven Family Center
	Agency/Group/Organization Type	Services - Homeless
	What section of the Plan was addressed by Consultation?	Homeless Needs – Families and Children Homelessness Strategy

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Prior to drafting the 2017 Annual Action Plan, MDHA consulted with stakeholders to obtain their input on developing the Plan. These consultations covered the following topics: Homelessness and Housing for Persons with Aids; Affordable Housing and Affirmatively Furthering Fair Housing; and Non-Housing Community Development Needs. Further descriptions of the meetings are detailed in the summary of this section above.
33	Agency/Group/Organization	Aphesis House
	Agency/Group/Organization Type	Services - Homeless
	What section of the Plan was addressed by Consultation?	Homeless Needs Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Prior to drafting the 2017 Annual Action Plan, MDHA consulted with stakeholders to obtain their input on developing the Plan. These consultations covered the following topics: Homelessness and Housing for Persons with Aids; Affordable Housing and Affirmatively Furthering Fair Housing; and Non-Housing Community Development Needs. Further descriptions of the meetings are detailed in the summary of this section above.
34	Agency/Group/Organization	Morning Star Sanctuary
	Agency/Group/Organization Type	Services – Homeless Services – Victims of Domestic Violence
	What section of the Plan was addressed by Consultation?	Homeless Needs – Domestic Violence Homelessness Strategy

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Prior to drafting the 2017 Annual Action Plan, MDHA consulted with stakeholders to obtain their input on developing the Plan. These consultations covered the following topics: Homelessness and Housing for Persons with Aids; Affordable Housing and Affirmatively Furthering Fair Housing; and Non-Housing Community Development Needs. Further descriptions of the meetings are detailed in the summary of this section above.
35	Agency/Group/Organization	Welcome Home Ministries
	Agency/Group/Organization Type	Services - Homeless
	What section of the Plan was addressed by Consultation?	Homeless Needs Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Prior to drafting the 2017 Annual Action Plan, MDHA consulted with stakeholders to obtain their input on developing the Plan. These consultations covered the following topics: Homelessness and Housing for Persons with Aids; Affordable Housing and Affirmatively Furthering Fair Housing; and Non-Housing Community Development Needs. Further descriptions of the meetings are detailed in the summary of this section above.
36	Agency/Group/Organization	Department of Veterans Administration
	Agency/Group/Organization Type	Other Government - Federal
	What section of the Plan was addressed by Consultation?	Homeless Needs -Veterans Homelessness Strategy

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Prior to drafting the 2017 Annual Action Plan, MDHA consulted with stakeholders to obtain their input on developing the Plan. These consultations covered the following topics: Homelessness and Housing for Persons with Aids; Affordable Housing and Affirmatively Furthering Fair Housing; and Non-Housing Community Development Needs. Further descriptions of the meetings are detailed in the summary of this section above.
37	Agency/Group/Organization	Operation Stand Down TN
	Agency/Group/Organization Type	Services - Homeless
	What section of the Plan was addressed by Consultation?	Homeless Needs - Veterans Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Prior to drafting the 2017 Annual Action Plan, MDHA consulted with stakeholders to obtain their input on developing the Plan. These consultations covered the following topics: Homelessness and Housing for Persons with Aids; Affordable Housing and Affirmatively Furthering Fair Housing; and Non-Housing Community Development Needs. Further descriptions of the meetings are detailed in the summary of this section above.
38	Agency/Group/Organization	Mending Hearts
	Agency/Group/Organization Type	Services - Homeless
	What section of the Plan was addressed by Consultation?	Homeless Needs Homelessness Strategy

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Prior to drafting the 2017 Annual Action Plan, MDHA consulted with stakeholders to obtain their input on developing the Plan. These consultations covered the following topics: Homelessness and Housing for Persons with Aids; Affordable Housing and Affirmatively Furthering Fair Housing; and Non-Housing Community Development Needs. Further descriptions of the meetings are detailed in the summary of this section above.
39	Agency/Group/Organization	Neighborhood Health
	Agency/Group/Organization Type	Services - Health
	What section of the Plan was addressed by Consultation?	Homeless Needs HOPWA Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Prior to drafting the 2017 Annual Action Plan, MDHA consulted with stakeholders to obtain their input on developing the Plan. These consultations covered the following topics: Homelessness and Housing for Persons with Aids; Affordable Housing and Affirmatively Furthering Fair Housing; and Non-Housing Community Development Needs. Further descriptions of the meetings are detailed in the summary of this section above.
40	Agency/Group/Organization	Metro Public Health Department
	Agency/Group/Organization Type	Services – Health Services – Persons w/ HIV/AIDS
	What section of the Plan was addressed by Consultation?	HOPWA Strategy Homelessness Strategy

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Prior to drafting the 2017 Annual Action Plan, MDHA consulted with stakeholders to obtain their input on developing the Plan. These consultations covered the following topics: Homelessness and Housing for Persons with Aids; Affordable Housing and Affirmatively Furthering Fair Housing; and Non-Housing Community Development Needs. Further descriptions of the meetings are detailed in the summary of this section above.
41	Agency/Group/Organization	HND Realty, LLC
	Agency/Group/Organization Type	Real Tracs - Nashville – Davidson County Multiple Listing Service (MLS)
	What section of the Plan was addressed by Consultation	Affordable Housing – Appendix B
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Upon publication of 2017 HOME Purchase Price Limits, MDHA consulted with a representative from HND Realty to obtain MLS data to determine if there was sufficient justification to establish a Local Purchase Price Limit for Nashville-Davidson County

Table 2 – Agencies, groups, organizations who participated

Identify any Agency Types not consulted and provide rationale for not consulting

MDHA attempted to engage as many participants as possible for consultations. Agencies and community members with interest in affordable housing, community development, and/or homelessness – whose contact information is on file at MDHA – were invited to the consultations; and MDHA encouraged invitees to circulate the information to other interested parties.

Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Governance Committee	<ul style="list-style-type: none"> -Setting agendas for full CoC meetings -Project monitoring -Determining project priorities -Providing final approval for the CoC application submission.
Nashville Next	Metro Planning Department	-Adopted plan for growth and preservation; addressing barriers to affordable housing
Nashville-Davidson Metro Housing Policy & Inclusionary Zoning Feasibility Study	Metro Planning Department	Increasing the supply of affordable housing is the number one priority in the 2013-2018 Consolidated Plan.
<i>Opening Doors: Federal Strategic Plan to Prevent and End Homelessness</i>	HUD	-Developing priorities for allocating funds to address homelessness
2016 Community Needs Evaluation	Metro Social Services	-Identifying unmet needs
Public Housing Agency Plan	MDHA	-Addressing the needs of public housing
Tennessee Housing Market at a Glance	THDA	-Identifying housing need and supply
100,000 Homes Campaign (How's Nashville), Zero2016 Plan to End Veterans Homelessness, and CoC Veterans' Leadership Committee	Metro Homelessness Commission	-Coordinating strategy to end chronic and Veteran homelessness
HUD-funded Continuum of Care technical assistance	HUD/Cloudburst group	Optimizing effectiveness of CoC
The Key Action Plan	Metro Homelessness Commission, Oasis Center	Create needed housing options for youth/young adults Create coordinated entry

Focus Strategies' Nashville System Performance Report	Metropolitan Homelessness Commission	Developing Housing Crisis Resolution System Streamlining system-level planning
The Tennessee State Plan to End Homelessness	Tennessee Interagency Council on Homelessness (TN Department of Mental Health and Substance Abuse Services)	Meshes w/ federal Opening Doors' goals of ending homelessness among vets, families, and youth, coordinates state government entities in addressing homeless issues
Metro Language Access Report	Metro Human Relations Commission	Guidance on developing systems to adequately provide services to linguistic minorities, namely, LEP and those who Deaf...
Mayor Megan Barry's Housing Priorities and Action Plan 2016 - 2017	Metropolitan Government of Nashville & Davidson County	Priorities and Actions for Funding, building, retaining and preserving affordable housing

Table 3 – Other local / regional / federal planning efforts

AP-12 Participation – 91.105, 91.200(c)

1. Summary of citizen participation process/Efforts made to broaden citizen participation

Summarize citizen participation process and how it impacted goal-setting

Activities proposed during the 2017 Program Year further the priorities of the 2013-2018 Consolidated Plan, as amended, which were established after a lengthy planning and public participation process. The Citizen Participation Plan in Substantial Amendment 1 to the 2013-2018 Consolidated Plan provides information on how citizens can become involved in the development, implementation and evaluation of housing and community development programs. The Citizen Participation Plan is available at <http://www.nashville-mdha.org/?p=1847>.

Interaction with the public and comments received throughout the year, as well as input from the consultations described in AP-10 shaped the particular activities proposed in this Action Plan, keeping in line with the 2013-2018 Consolidated Plan, as amended and HUD and local priorities, such as NashvilleNext and the Mayor's Housing Priorities and Action Plan. Comments submitted during the public comment period have been considered and incorporated to the extent possible into the final Action Plan.

For the purpose of the 2017 Action Plan, the public comment began on April 17, 2017 and concluded at 4:00 p.m. on May 19, 2017. During the public comment period, members of the public were invited to share their comments at two public hearings. Details regarding the public comment period and public hearings are provided in the Public Notice included in Appendix F.

The Public Notice was published in English and Spanish advertised in *The Tennessean*, *The Tribune*, and *El Crucero*. In addition, the Notice was posted in English and Spanish at MDHA administrative and public housing properties and on MDHA's website (www.nashville-mdha.org). The Notice was widely distributed via email to over 300 partners, government officials, nonprofit organizations, businesses, neighborhood groups, and citizens, whose email addresses have been provided to MDHA, and was sent to the Mayor's Office, Vice Mayor Briley, and Members of the Metro Council. MDHA encouraged recipients to circulate the Notice among their networks. The public comment period and public hearings and reminders were publicized via MDHA's social media outlets. Notice was specifically provided to Conexión Américas, The Center for Independent Living of Middle Tennessee, Native American Indian Association of Tennessee, Nashville International Center for Empowerment, and Metro Council.

The public hearing held on May 9, 2017, was broadcast multiple times on the local government access channel, Metro 3. In addition, the video of the public hearing was made available on Metro's YouTube Channel.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Newspaper Ad (The Tennessean)	Non-targeted/broad Community	N/A	N/A	N/A	
2	Newspaper Ad (The Tribune)	Minorities	N/A	N/A	N/A	
3	Newspaper Ad (El Crucero)	Non-English Speaking (Spanish)	N/A	N/A	N/A	
4	Internet Outreach (MDHA Website)	Non-targeted/broad Community	N/A	N/A	N/A	www.nashville-mdha.org
5	Internet Outreach (Social Media)	Non-targeted/broad Community	N/A	N/A	N/A	
6	Other: Posting at Public Housing & Other MDHA Properties	Residents of Public and Assisted Housing	N/A	N/A	N/A	
7	Other: Public Hearing	Non-targeted/broad Community	See Appendix F.	See Appendix F.	See Appendix F.	
8	Other: Email Distribution	Non-targeted/broad community	N/A	N/A	N/A	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
9	Other: Targeted Email	Non-English speaking persons (Spanish); Immigrants; Native Americans; Minorities; Persons with Disabilities	N/A	N/A	N/A	
10	Other: Distribution at Tennessee Fair Housing Matters Conference	Housing providers	N/A	N/A	N/A	
11	Other: Video of May 9th Public Hearing available on YouTube	Non-targeted/broad community	N/A	N/A	N/A	

Table 4 – Citizen Participation Outreach

Expected Resources

AP-15 Expected Resources – 91.220(c) (1. 2)

Introduction

MDHA received Notice of 2017 Allocations for CPD formula grants on June 14, 2017. Allocations for Metro Nashville for HOME, CDBG, and HOPWA reflected slight increases over the 2016 Allocations; however, the 2017 allocation for the ESG program was approximately \$5,965 less than the 2016 allocation. The 2017 proposed budget provided in the draft Action Plan was expressed in terms of percentages (and dollar equivalents) of the 2017 annual allocations to be budgeted to each planned activity. Once final allocations were received from HUD, MDHA adjusted these activity budgets to reflect the same percentage of the actual allocations, with rounding. The table below shows the ten-year allocation history for the four CPD grants.

	CDBG	HOME	ESG	HOPWA
2008	\$ 4,846,903.00	\$ 2,980,179.00	\$ 219,948.00	\$ 795,000.00
2009	\$ 4,984,105.00	\$ 3,270,421.00	\$ 215,801.00	\$ 829,966.00
2010	\$ 5,393,336.00	\$ 3,263,718.00	\$ 218,915.00	\$ 903,441.00
2011	\$ 4,508,020.00	\$ 2,880,319.00	\$ 341,417.00	\$ 911,759.00
2012	\$ 4,262,373.00	\$ 1,791,694.00	\$ 390,383.00	\$ 900,557.00
2013	\$ 4,694,678.00	\$ 1,855,995.00	\$ 310,953.00	\$ 852,786.00
2014	\$ 4,606,281.00	\$ 1,933,490.00	\$ 381,390.00	\$ 914,427.00
2015	\$ 4,625,859.00	\$ 1,770,963.00	\$ 410,588.00	\$ 923,834.00
2016	\$ 4,559,221.00	\$ 1,829,517.00	\$ 416,420.00	\$ 942,082.00
2017	\$ 4,637,909.00	\$ 1,881,838.00	\$410,455.00	\$1,073,473.00

Total Expected Resources for the 2017 Program Year include the estimated annual allocations for CDBG, HOME, ESG and HOPWA; estimated program income (PI) for CDBG; actual PI for HOME accumulated January through May, 2017 (as allowed by the HOME Program Commitment Requirement Interim final rule that became effective January, 2017); and prior year resources – funds carried-forward from the current program year to continue projects (for CDBG and HOME) and reprogrammed funds. MDHA expects to receive \$191,000 in CDBG PI during PY 2017. Carryforward funds result when projects take longer than one year to implement and the intended use of the funds remains the same as in the prior year. Prior year funds are reprogrammed when projects are completed below budget or when the demand is less than anticipated. The table below explains which 2016 CDBG and HOME funds that will be reprogrammed; no other grant funds will be reprogrammed.

Of the Expected Resources, a minimum of 15% of the 2017 HOME allocation (\$282,276.00) will be set aside for projects undertaken by eligible Community Housing Development Organizations (CHDOs).

2016 Reprogrammed CDBG Activities

Activity	2016 Budget	Amount Expended/ Obligated	Amount Reprogrammed	Comments
Healthy Food Initiatives	\$ 24,000.00	\$ 11,084.00	\$ 12,916.00	Lack of Demand; Existing program was funded with carryforward funds and will operate during the 2017 program year. \$12,916 reprogrammed to the 2017 Fair Housing public service activity.
Summer Youth Programs	\$ 430,000.00	\$412,223.09	\$ 17,776.91	2016 program completed under budget; \$17,776.91 reprogrammed to infrastructure improvements
Commercial Rehab – Façade Loans	\$150,000.00	-0-	\$ 37,500.00	Lack of Demand; \$37,500 reprogrammed to H/O Rehab
Economic Development: Microenterprise Assistance	\$215,000.00	-0-	\$ 50,000.00	Lack of Demand; \$50,000 reprogrammed to H/O Rehab
Total CDBG	\$819,000.00	\$423,307.09	\$ 118,192.91	

2016 Reprogrammed HOME Activities

Activity	2016 Budget	Amount Expended/ Obligated	Amount Reprogrammed	Comments
Homeowner Rehab – Rehab	\$115,000.00	\$14,749.00	\$100,251.00	Lack of Demand and infeasible due to minimum property standards for rehab of units using HOME funds. CDBG funds will be utilized for this activity. Reprogrammed to Homeownership: Homebuyer Programs
Total HOME	\$115,000.00	\$14,749.00	\$100,251.00	

In addition to these CPD and CoC resources, MDHA continues to administer the CDBG Disaster Recovery (CDBG-DR) Grant on behalf of Metro Nashville. This is a one-time appropriation in the amount of \$33,089,813; and all funds have been obligated to projects and the grant is 83% expended.

MDHA also administers the Weatherization Assistance Program (WAP) and the Low Income Energy Assistance Program (LIHEAP) in Davidson County. These programs operate in tandem. Funding passes from the U.S. Department of Energy (DOE), through the Tennessee Housing Development Agency (THDA), to local agencies, such as MDHA. MDHA has received a total WAP award of \$621,202.77 to serve 62 households during the period July 1, 2016 thru June 30, 2017 and a total LIHEAP award of \$585,031.62.

For several years, a Federal budget has not been enacted for several months after the beginning of the Federal fiscal year on October 1. Having a program year start date of April 1, Metro Nashville would not receive its notice of allocation until the end of the first quarter of its program year and not receive funding until the end of the second quarter. To better align with these funding cycles, MDHA, on behalf of Metro Nashville, applied to and was approved by HUD to change the start date for the 2017 program year to June 1. Since MDHA does not expect to receive the 2017 allocation until July – at the earliest – many activities are proposed to begin on July 1. MDHA began the process of preparing for later activity start dates during the 2016 Program Year in anticipation of making this change.

Priority Table

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 5				Expected Amount Available Reminder of ConPlan	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	Public-federal	Acquisition; Admin & Planning; Economic Development; Housing; Public Improvements; Public Services; Nonprofit Capacity Bldg.	\$4,637,909.00	\$ 191,000.00	\$1,435,775.00	\$6,264,684.00	0	Activities that benefit LMI households (≤80% AMI) or LMI neighborhoods (≤65% AMI)
HOME	Public-federal	Admin; Homebuyer Programs; Homeowner Rehab; Rental Projects	\$1,881,838.00	\$ 217,854.00	\$ 154,956.00	\$ 2,254,648.00	0	Funding for affordable rental housing (≤60%) or homeownership (≤80%)
ESG	Public-federal	Admin; Emergency Shelter; HMIS; Street Outreach; Rapid Re-housing; Prevention	\$ 410,455.00			\$ 410,455.00	0	Homeless Assistance Programs

HOPWA	Public-federal	Admin; Facility-based Housing Operations; STRMU; Supportive Services	\$1,073,473.00			\$1,073,473.00	0	Assistance for persons with HIV/AIDS and their families
Other: Continuum of Care	Public-federal	Permanent housing placement for homeless	\$3,234,117.00			\$3,234,117.00	0	Focus on permanent supportive housing

Table 5 - Expected Resources – Priority Table

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

HUD encouraged grantees to effectively plan and implement programs that leverage critical Federal resources to achieve the greatest possible return for the communities and individuals they are intended to assist. MDHA attempts to accomplish this in several ways. Except for homeowner rehab assistance, applications for funding should demonstrate the ability to leverage funds. This is part of the Financial Capacity evaluation criteria for requests for proposals. MDHA will seek to leverage CDBG funds made available for the rehabilitation of rental units with Section 8 vouchers. In addition, MDHA's grant writer researches Federal, state, local, and private funding opportunities and will apply for funds that further MDHA's mission, as well as Consolidated Plan and Public Housing Plan priorities.

To leverage continually shrinking HOME dollars, MDHA continues efforts to fund projects that leverage other resources for affordable housing development. For example, in 2016, MDHA leveraged approximately \$540,000 million in HOME funds with \$1,420,010 in additional from U.S. HUD/SHOP Grant, Federal Home Loan Bank AHP funds, and private funds from corporations, foundations, churches, and individuals for projects that will create 49 affordable housing units. In 2017, MDHA will make additional HOME funds available for this effort. Additionally, the Barnes Fund, Metro's local Housing Trust Fund, made \$10 million available during the fall of 2016 for development of affordable housing. Awards made as a result of this funding will result in the creation of approximately 345 additional affordable housing units. An additional \$5 million was made available during the spring of 2017 from the Barnes Fund for development of affordable housing; awards are pending.

In July of 2016 Metro Council directed the Mayor's Office of Economic Opportunity and Empowerment to work with the Council's Ad Hoc Affordable Housing Committee to develop and implement a comprehensive plan to address the issue of housing affordability in Nashville and Davidson County. This plan, called the "Housing Nashville Report" was released in May 2017. This plan coordinates and builds upon the research and policy recommendations of existing plans and identifies the needs and gaps of affordable and workforce housing in Nashville's neighborhoods and provides a road map for addressing the needs in an equitable and coordinated fashion and with a provision for a regular re-evaluation of the stated goals. This plan will largely determine how local resources to address housing needs are allocated.

Another opportunity to leverage HOME funds is with Low Income Housing Tax Credits (LIHTC). Since 2010, MDHA has competitively awarded a total of \$5.4 million in HOME funds to 5 developers utilizing LIHTC that will result in the creation of 394 units affordable to households with incomes at or below 60% AMI. MDHA is actively pursuing other funding opportunities to leverage HOME and CDBG funds to create affordable housing through the Community Reinvestment Act (CRA), HUD-insured loans, the Rental Assistance Demonstration (RAD) program, and the State Housing Trust Fund (HFT). In 2015, MDHA was awarded a grant in the amount of \$500,000 from the State Housing Trust fund to assist in the construction of 70 units of new public housing, which will be completed

in June 2017. MDHA is closely monitoring the implementation of the National Housing Trust Fund for future funding opportunities.

Where appropriate, leverage may be achieved through supportive services provided by partners. For example, by leveraging supportive services of two nonprofit agencies, in 2013 MDHA awarded \$2.7 million in HOME funds to create 26 permanent supportive housing units for the homeless. On one of the projects, MDHA partnered with the nonprofit developer, Buffalo Valley, Inc., to secure competitive Project Based Voucher (PBV) set-aside funding for 32 units made available through the HUD-VASH Program.

The HOME program requires a 25% match of the total HOME funds drawn down for project costs. This match is different than leverage, and this requirement will be met by requiring partners to provide at least a 25% match on projects, Barnes Trust fund projects that meet the requirements of the HOME program, by the value of donated land or improvements, or by other eligible methods as provided in the HOME regulations. Amounts above the 25% match are considered leverage.

ESG also requires a match, and all organizations applying for funds must provide a 100% match of the funds they are seeking. The HMIS and MDHA administration match requirements may be satisfied by cash, the value of the time and services provided, or other eligible methods as provided by the ESG regulations.

If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

MDHA and Metro Government own vacant and improved property throughout the jurisdiction. A total of 2 MDHA owned lots were awarded to a nonprofit organization through a HOME open application in 2016 to be used to create 14 units of affordable housing. The Request for Applications through the Barnes Fund released in the fall of 2016 also included 36 Metro Government lots to be used to create affordable housing. As a result, 17 properties were awarded to a nonprofit developer to use to construct affordable homeownership housing.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives - 91.420, 91.220(c)(3)&(e)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Production of new units & Rehabilitation of existing	2013	2018	Affordable Housing	Tier 2 Areas Countywide Metropolitan Statistical Area	Develop & Implement Place-Based Strategies for CD Increase Supply of Affordable Housing	CDBG: \$3,022,660 HOME: \$2,048,313	Acquisition of property: 2 Rental units constructed: 40 Household Housing Unit Rental units rehabilitated: 10 Household Housing Unit Homeowner Housing Added: 4 Household Housing Unit Homeowner Housing Rehabilitated: 130 Household Housing Unit Direct Financial Assistance to Homebuyers: 4 Households Assisted Other: 10 Other

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
2	Administration & Planning	2013	2018	General	Tier 2 Areas Countywide	Increase Supply of Affordable Housing Affirmatively Further Fair Housing Choice Decrease Homelessness Develop & Implement Place-Based Strategies for CD Increase Access to Healthy Food Choices Provide Housing Assistance for Persons with HIV Provide Summer Programs for Low- and Moderate-Income Strengthen Collaboration Among Network of Service Providers	CDBG: \$965,781 HOPWA: \$107,347 HOME: \$206,335 ESG: \$30,784	N/A

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
3	Public Services & Economic Development	2013	2018	Non-Housing Community Development	Tier 1 & Tier 2 Areas LMI Food Deserts Countywide	Affirmatively Further Fair Housing Choice Decrease Homelessness Develop & Implement Place-Based Strategies for CD Increase Access to Healthy Food Choices Provide Summer Programs for Low- and Moderate-Income Strengthen Collaboration Among Network of Service	CDBG: \$1,422,050	Public service activities other than Low/Moderate Income Housing Benefit: 2630 Persons Assisted Facade treatment/business building rehabilitation: 2 Business Businesses assisted: 35
4	Public Facilities & Public Improvements & Infrastructure	2013	2018	Non-Housing Community Development	Tier 1 & Tier 2 Areas Countywide	Decrease Homelessness Develop & Implement Place-Based Strategies for CD	CDBG: \$824,326	Public facilities: 4

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
5	Outreach Emergency Shelter Transitional Housing Rapid Re-housing Prevention	2013	2018	Homeless	Countywide	Decrease Homelessness	ESG: \$379,671	*Homeless Person Overnight Shelter: 2,000 Persons Assisted Rapid Re-housing: 300 Persons Assisted Prevention: 27 persons Assisted Street Outreach: 100 Persons Assisted
6	Housing Opportunities for Persons with AIDS	2013	2018	Non-Homeless Special Needs	Countywide	Provide Housing Assistance for Persons with HIV	HOPWA: \$966,126	*Housing for People with HIV/AIDS: Short-term rent/mortgage /utility assistance:334 Households HIV/AIDS Housing Operations: 42 Households Supportive Services: 1,488 households

Table 6 – Goals Summary

*Goal Outcome Indicators for ESG & HOPWA Activities are based on 2016 funding levels for each activity.

Goal Descriptions

1	Goal Name	Production of new units & Rehabilitation of existing
	Goal Description	-CDBG Activities: Acquisition & Related Activities; Homeowner Rehab (Targeted & Countywide); HVAC Installation/Replacement; Rental Rehab; Program Delivery; Housing Services; Nonprofit Capacity Building -HOME Activities: Homebuyer (New Home Construction & Downpayment Assistance): Rental Projects (New Construction)
2	Goal Name	Administration & Planning
	Goal Description	Administration and planning activities for CDBG, HOME, ESG, and HOPWA for MDHA and project Sponsors
3	Goal Name	Public Services & Economic Development
	Goal Description	CDBG Activities: -Economic Development: Microenterprise Assistance, Commercial Rehab (Façade Loans), Business Technical Assistance, Section 108 Loan Repayment -Public Services: Fair Housing, Healthy Food Initiatives, Summer Youth, Services for the Homeless
4	Goal Name	Public Facilities & Public Improvements & Infrastructure
	Goal Description	-CDBG Activities: Infrastructure Improvements (Residential Areas); Rehab, Expansion of, or New Neighborhood Facilities and/or Homeless or Domestic Violence Shelters
5	Goal Name	Outreach, Emergency Shelter, Transitional Housing, Rapid Re-housing, Prevention
	Goal Description	-ESG Activities: Emergency Shelters (Operation & Essential Services); Street Outreach; HMIS; Rapid Re-housing, Prevention
6	Goal Name	Housing Opportunities for Persons with AIDS
	Goal Description	-HOPWA Activities: Sponsor Administration; Facility-Based Operations; Supportive Services; Short-term Rent, Mortgage & Utility Assistance

Table 7 – Goal Descriptions

*Goal Outcome Indicators for ESG & HOPWA Activities are based on 2016 funding levels for each activity.

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.215(b):

It is estimated that during Program Year 2017 HOME funds will result in affordable housing that will benefit approximately 44 extremely low and low- and moderate-income families. Preference will be given to projects proposing to benefit extremely low-income families. This estimate includes affordable housing produced by CHDOs and other Developers and leveraged with other resources. Also, this estimate includes both new construction and rehabilitation of single family and multi-family housing.

AP-35 Projects – 91.220(d)

Introduction

The following are proposed projects/activities to be undertaken during the 2017 Program Year. Detailed description for each follows.

#	Project Name
1	CDBG: Acquisition
2	CDBG: Administration and Planning
3	CDBG: Economic Development: Commercial Rehab (Façade Loans)
4	CDBG: Economic Development: Business Technical Assistance
5	CDBG: Economic Development: Microenterprise Assistance
6	CDBG: Economic Development: Section 108 Loan Repayment
7	CDBG: Housing: Homeowner Rehabilitation (Countywide)
8	CDBG: Housing: Homeowner Rehabilitation (Targeted)
9	CDBG Housing: HVAC Install/Replacement Program
10	CDBG Housing: Program Delivery
11	CDBG Housing: Housing Services
12	CDBG Housing: Rental Rehab
13	CDBG: Public Facilities: Neighborhood Facilities
14	CDBG: Public Facilities: Infrastructure Improvements Residential)
15	CDBG: Public Services: Summer Youth Programs
16	CDBG: Public Services: Fair Housing
17	CDBG: Public Services: Healthy Food Initiatives
18	CDBG: Public Services: Services for Homeless Persons
19	CDBG: Other: Nonprofit Organization Capacity Building
20	HOME: Administration
21	HOME: Homeownership: Homebuyer Programs
22	HOME: Homeownership: Homeowner Rehab
23	HOME: Rental Projects
24	ESG: Administration, Emergency Shelter & Transitional Housing, HMIS, Rapid Re-Housing, Street Outreach, and Prevention
25	HOPWA: Administration/MDHA, Facility-Based Operations, Short-term Rent, Mortgage, and/or Utility Payments (STRMU), and Supportive Services

Table 8 – Project Information

Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

According to the 2016 Community Needs Evaluation prepared by Metro Social Services, 111,230 Davidson County residents were living in poverty during 2015, down from 129,057 in 2014. Davidson County's overall poverty rate of 16.9% is slightly higher than the 16.7% rate for Tennessee and the 14.7% rate for the United States. (The poverty guideline for one person is \$11, 880, \$16,020 for two, \$20,160 for three, etc.) The poverty rate is lower than in 2014, which was 19.9% (Davidson County), 18.3% (Tennessee), and 15.5% (U.S.) The percent of children (under age 18) in Davidson County living in poverty in 2015 is 27.5%, compared to 24.2% for Tennessee and 20.7% for the U.S. These rates are also lower than in 2014, which were at 33.1%, 26.2%, and 21.7% respectively.

Of the 274,187 households in Davidson County, 90,250 households (55,388 renters and 34,862 owners) were cost burdened in 2015, paying more than 30% of their income for housing expenses. Cost burden is particularly acute for households with incomes below \$35,000, with 44,922 renters and 19,273 owners affected, making the need for affordable housing severe.

This need is compounded by Nashville's newfound popularity, and many are relocating to Nashville in search of economic opportunities. This influx has put tremendous pressure on an already stressed affordable housing market. According to a Housing Policy and Inclusionary Zoning and Feasibility Study finalized in March, 2016 by Economic & Planning Systems, Inc., the following problems are present in the Nashville housing market: average housing costs have escalated more than 100% since 2000 (120% for new housing); high rates of housing cost escalation countywide (highest in and around the inner loop); high rates of housing turnover, and displacement of low-income renter households.

The crisis has risen to a level that all sectors of the housing industry, advocates, and government officials are exploring multiple avenues to address the issue. The largest obstacle is the lack of financial resources. In response, Mayor Barry in April 2016 released her housing priorities and action plan for 2016-2017 that focused on city resources and attention on the need to fund, build, preserve and maintain affordable and workforce housing in Davidson County. One of the highlights of the plan included a \$10 million investment included in her first annual budget in the Barnes Fund for Affordable Housing and a commitment for this amount to be included in future budgets during her administration. This investment in the Barnes Fund is the largest since the Fund was created in 2013 and will be in addition to \$5 million to be received from the sale of the Nashville Convention Center that was committed to the fund during the prior administration. This local investment will help fill Nashville's widening affordable housing gap and will help supplement funding for the HOME program that has been continually shrinking (i.e., reduced by 37% since 2008).

In July of 2016 Metro Council directed the Mayor's Office of Economic Opportunity and Empowerment to work with the Council's Ad Hoc Affordable Housing Committee to develop and implement a comprehensive plan to address the issue of housing affordability in Nashville and Davidson County. This plan, called the "Housing Nashville Report" was released in May 2017. This plan coordinates and builds upon the research and policy recommendations of existing plans and identifies the needs and gaps of affordable and workforce housing in Nashville's neighborhoods and provides a road map for addressing the needs in an equitable and coordinated fashion and with a provision for a regular re-evaluation of the stated goals. This plan will largely determine how local resources to address housing needs are allocated.

Proposed activities in this Action Plan are based upon priorities identified in the 2013-2018 Consolidated Plan, HUD and local priorities, feedback received throughout the year, responses to funding opportunities/interest in programs, and input from the consultations. The top priority for the 2017 Action Plan is addressing housing needs. HOME, ESG, and HOPWA were specifically created to address affordable housing and homelessness. In addition, approximately 48% of the estimated 2017 CDBG allocation has been programmed to address housing needs through a variety of activities. In addition, CDBG funds will be utilized to create economic opportunities for low-income persons and enhance very low-income areas.

To ensure that activities maximize Federal funds and do not duplicate, but rather supplement, local efforts, MDHA works closely with Metro to coordinate projects.

The following activities are limited by regulatory caps

Activity	Cap	Allocation	PI Estimated/ Actual	Amount to Budget	Amount Budgeted
CDBG Admin. & Planning	20% of Allocation & PI	\$4,637,909.00	\$191,000.00 - Estimated	\$965,781.80	\$965,781.00
CDBG Public Services Programs	15% of Allocation	\$4,637,909.00		\$ 695,686.35	\$627,894.00
HOME Administration	10% of Allocation & PI	\$1,881,838.00	\$217,854.00 - Actual	\$209,969.20	\$206,335.00
ESG Administration	7.5% of Allocation	\$ 410,455.00		\$ 30,784.13	\$ 30,784.00
ESG Shelter Operations & Street Outreach	60% of Allocation	\$ 410,455.00		\$246,273.00	\$246,273.00
HOPWA Administration	10% of Allocation	\$1,073,473.00		\$107,347.30	\$107,347.00

Projects/Activities

The 2017 proposed budgets for CDBG and HOME projects were expressed in the draft Action Plan in terms of percentages of the 2017 annual allocations budgeted for each planned activity, along with estimates based on 2016 funding. Once the final allocations were received from HUD, MDHA adjusted all CDBG and HOME activity budgets to reflect the same percentage of the actual allocations, with rounding. The final allocations for 2017 ESG and HOPWA activities, other than those carried out by MDHA staff, will be determined via a Request for Application (RFA) process and the demand for funding for specific activities subject to regulatory caps. If an activity is funded solely with carryforward or reprogrammed funds, the dollar amounts budgeted were actual and did not change when the final 2017 annual allocation was received.

AP-38 Projects Summary

Project Summary Information

1	Project Name	CDBG: Acquisition
	Target Area	Tier 2 Priority Areas
	Goals Supported	Production of new units & rehabilitation of existing housing or neighborhood/community facilities (such as open space
	Needs Addressed	Increase Supply of Affordable Housing Develop & Implement Place-Based Strategies for CD
	Funding	\$230,082 (carryforward funds)
	Description	MDHA will identify vacant or built properties that are suitable for housing to be occupied by LMI persons or neighborhood/community facilities that benefit LMI areas.
	Target Date	7/1/17-6/30/18
	Estimate the number and type of families that will benefit from the proposed activities	2 properties
	Location Description	Areas with high concentrations of poverty
	Planned Activities	Activities will include acquisition and related activities (clearance, demolition, relocation clean up, and disposition). Disposition activities extend countywide. Activities will be undertaken by MDHA.

2	Project Name	CDBG: Administration and Planning
	Target Area	Countywide
	Goals Supported	Planning
	Needs Addressed	Increase Supply of Affordable Housing Strengthen Collaboration Among Network of Service Increase Access to Healthy Food Choices Decrease Homelessness Develop & Implement Place-Based Strategies for CD Provide Summer Programs for Low- and Moderate-I Provide Housing Assistance for Persons with HIV Affirmatively Further Fair Housing Choice
	Funding – Based on 20% of Allocation and 20% of Estimated PI	\$965,781.80 (\$927,581.80 annual allocation + \$38,200 estimated PI)
	Description	Program administration and overall program management, coordination, monitoring, reporting, and evaluation. Development of the annual action plan, citizen participation, and annual assessments. Planning includes studies, analysis, data gathering, preparation of plans, and identification of actions that will implement plans.
	Target Date	7/1/17-6/30/18
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	MDHA Administrative Offices
	Planned Activities	In addition to general administration and planning functions, \$40,000 of the budget will be allocated specifically for planning efforts in Tier 2 Priority Areas. Administrative and most planning functions will be undertaken by MDHA. MDHA may solicit contractor(s) to perform certain planning activities.

3	Project Name	CDBG: Economic Development: Commercial Rehab (Façade Loans)
	Target Area	Tier 1 Areas
	Goals Supported	Public Service & Economic Development
	Needs Addressed	Develop & Implement Place-Based Strategies for CD
	Funding	\$112,500 (carryforward funds)
	Description	Financial assistance for the exterior rehab of commercial buildings located in Target Areas
	Target Date	7/1/17- 6/30/18
	Estimate the number and type of families that will benefit from the proposed activities	2 businesses
	Location Description	Businesses located in Tier 1 Areas.
Planned Activities	MDHA will make a range of financing options available to businesses in located in Tier 1 areas to make exterior (Façade) improvements and to correct code violations on their properties. Forms of assistance may include deferred payment and low-interest loans, matching grants, etc. The terms of the loan will vary based on the amount of assistance. The maximum loan amount is \$50,000. All assistance is subject to underwriting review to determine the appropriate amount of assistance. Eligible costs include labor, materials, supplies and soft costs related to the rehabilitation. Landscaping, sidewalks, and driveways are eligible when the cost of such work is incidental to other rehabilitation of the property. MDHA will administer the program, and funding requests may be made by application until funding is exhausted. A portion of the funds may be used to pay for MDHA costs associated with administering the program.	

4	Project Name	CDBG: Economic Development: Business Technical Assistance
	Target Area	Tier 1 Areas
	Goals Supported	Public Service & Economic Development
	Needs Addressed	Develop & Implement Place-Based Strategies for CD
	Funding	\$0.00 (Pathway Lending is utilizing \$300,000 in 2015 funds for 2-year program described below. Since these funds are obligated, they are not considered carryforward.)
	Description	Technical assistance and training provided directly to for-profit businesses and to businesses where one of the owners qualifies as LMI.
	Target Date	10/1/15-6/30/2018
	Estimate the number and type of families that will benefit from the proposed activities	20 businesses annually
	Location Description	Tier 1 Areas
	Planned Activities	MDHA is partnering with Southeast Community Capital, DBA as Pathway Lending a private 501(c)(3) organization established to provide financial and technical assistance for economic development opportunities to low income communities and is certified by the U.S. Treasury Department as a Community Development Financial Institution (hereinafter "CDFI"), to administer the Business Technical Assistance program and to provide business technical assistance and training directly to for-profit businesses, to include workshops on Business Transformation, Money Smart for Small Business, Social Media for Business, the Basics of Government Contracting, and the Basics of Construction, marketing, and referrals, particularly for businesses that are located or may locate in Tier 1 Areas. An emphasis will be placed on disadvantaged businesses and business opportunities for public housing residents including opportunities for Section 3 Businesses. A portion of the funds may be used to pay for MDHA costs associated with administering the program.

5	Project Name	CDBG: Economic Development: Microenterprise Assistance
	Target Area	Tier 1 Areas
	Goals Supported	Public Service & Economic Development
	Needs Addressed	Develop & Implement Place-Based Strategies for CD
	Funding	\$165,000 (carryforward)
	Description	Microenterprise assistance to a commercial enterprise that has five or fewer employees, one or more of whom owns the enterprise and is LMI or is located in a Tier 1 Area.
	Target Date	7/1/17-6/30/18
	Estimate the number and type of families that will benefit from the proposed activities	15 businesses annually
	Location Description	Tier 1 Areas
	Planned Activities	MDHA is partnering with Southeast Community Capital, DBA as Pathway Lending a private 501(c)(3) organization established to provide financial and technical assistance for economic development opportunities to low income communities and is certified by the U.S. Treasury Department as a Community Development Financial Institution (hereinafter "CDFI") to administer the Microenterprise Assistance program to provide microenterprise assistance particularly for businesses that are located or may locate in Tier 1 Areas. An emphasis will be placed on women-owned businesses and business opportunities for public housing residents. Activities will include recruiting program participants; providing business and personal development training programs to qualified businesses/persons; providing individual consulting to participants for the development of business plans, loan applications and business problem-solving during and after start-up; facilitating access to business mentors or volunteers such as accountants or lawyers for the duration of the contract; advising and assisting participants concerning participation with existing trade associations, business networks, and lenders. A portion of the funds may be used to pay for MDHA costs associated with administering the program.

6	Project Name	CDBG: Economic Development: Section 108 Loan Repayment
	Target Area	East Bank of Cumberland River
	Goals Supported	Public Service & Economic Development
	Needs Addressed	N/A
	Funding – Based on payment required by Loan Amortization schedule – will not fluctuate based on allocation	\$516,655.50 (annual allocation)
	Description	Funds will be used to make principal and interest payments on a Section 108 loan.
	Target Date	8/31/1998-8/1/2018
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	East Bank of Cumberland River
Planned Activities	In 1998, MDHA obtained a Section 108 loan in the amount of \$6,000,000 to acquire land on the East Bank to eliminate slums and blight. Annual payments are made from the annual CDBG allocation. As of 1/31/2017, the loan balance is \$985,000.	

7	Project Name	CDBG: Housing: Homeowner Rehabilitation
	Target Area	Countywide
	Goals Supported	Production of new units & Rehabilitation of existing units
	Needs Addressed	Increase Supply of Affordable Housing Affirmatively Further Fair Housing Choice
	Funding – Based on 29% of Allocation excluding PI and reprogrammed funds	\$1,585,293.61 (\$1,344,993.61 annual allocation + \$152,800 estimated PI + \$87,500 from reprogrammed funds)
	Description	Repair/rehab of homes occupied by LMI families.
	Target Date	9/1/17-6/30/18
	Estimate the number and type of families that will benefit from the proposed activities	70 LMI families (≤ 80% AMI)
	Location Description	Countywide, with targeted outreach to areas that have been historically underserved
	Planned Activities	Assistance will be provided in the form of forgivable loans for elderly (age 62+) homeowners. Assistance to other homeowners will be provided in the form of deferred (due on sale) loans. Repairs or improvements will be limited to items that address health and safety needs, such as heat/air, roof repair, plumbing, electrical, and accessibility. Priority will be given to homeowners whose incomes are at or below 50% AMI, persons with disabilities, and the elderly (age 62+). This program will be administered directly by MDHA. Homeowners may apply during the open application period, and funds will be allocated on a first-come, first-serve basis to eligible households until funding is exhausted.

8	Project Name	CDBG: Housing: Homeowner Rehabilitation (Targeted)
	Target Area	North Nashville (Tier 2 Priority Area)
	Goals Supported	Production of new units & Rehabilitation of existing units
	Needs Addressed	Increase Supply of Affordable Housing Develop & Implement Place-Based Strategies for CD Affirmatively Further Fair Housing
	Funding	\$0.00 (Rebuilding Together Nashville is implementing the 2014/2015 program using prior year funds.)
	Description	Repair/rehab of homes occupied by LMI families within the North Nashville Tier 2 Priority Area
	Target Date	4/1/16-1/31/18
	Estimate the number and type of families that will benefit from the proposed activities	30 (≤ 80% AMI)
	Location Description	North Nashville (Tier 2 Priority Area)
	Planned Activities	MDHA, through its contracted partner Neighborhoods Resource Center and the community, identified streets within North Nashville (Tier 2 Priority Area) to be targeted for the improvements associated with this activity. The construction/project management coordination services for this project are being handled by the nonprofit organization, Rebuilding Together Nashville, selected through the procurement process. 14 applications are currently in various processing stages; 1 home has been completed; 3 homes have contracts pending. Assistance is provided as a grant and includes repairs to address health and safety needs, such as heat/air, roof repair, plumbing, electrical, and accessibility and exterior aesthetic improvements (excluding landscaping). Priority is being given to homeowners whose incomes are at or below 50% AMI, persons with disabilities, and the elderly (age 62+). Homeowners may apply during the open application period, and funds will be allocated on a first-come, first-serve basis to eligible households until funding is exhausted.

9	Project Name	CDBG: Housing: HVAC Installation/Replacement Program
	Target Area	Countywide
	Goals Supported	Production of new units & Rehabilitation of existing units
	Needs Addressed	Increase Supply of Affordable Housing Affirmatively Further Fair Housing Choice
	Funding – based on 3% of allocation	\$177,151.01 (annual allocation)
	Description	Installation of new HVAC systems or replacement of nonfunctioning HVAC units for eligible
	Target Date	7/1/17-6/30/18
	Estimate the number and type of families that will benefit from the proposed activities	30 (≤ 80% AMI)
	Location Description	Countywide
	Planned Activities	Installation of new HVAC systems or replacement of nonfunctioning HVAC units; assistance will be treated as a grant. Homeowners may apply during the open application period or be referred to the program through the Homeowner Rehab or Weatherization Programs. Funds will be allocated on a first-come, first-serve basis to eligible households until funding is exhausted.

10	Project Name	CDBG: Housing: Program Delivery
	Target Area	Countywide
	Goals Supported	Production of new units & Rehabilitation of existing units
	Needs Addressed	Increase Supply of Affordable Housing Develop & Implement Place-Based Strategies for CD Affirmatively Further Fair Housing
	Funding – based on 10% of allocation	\$450,000 (annual allocation)
	Description	Costs associated with CDBG housing activities.
	Target Date	7/1/17-6/30/18
	Estimate the number and type of families that will benefit from the proposed activities	Accomplishments will be tied to specific Housing activities.
	Location Description	Countywide
	Planned Activities	MDHA costs directly related to carrying out specific CDBG Housing activities.

11	Project Name	CDBG: Housing: Housing Services
	Target Area	Countywide
	Goals Supported	Production of new units & Rehabilitation of existing units
	Needs Addressed	Increase Supply of Affordable Housing Develop & Implement Place-Based Strategies for CD Affirmatively Further Fair Housing
	Funding – based on 1% of allocation	\$50,000 (annual allocation)
	Description	Costs to support activities eligible for funding under the HOME program
	Target Date	7/1/17-6/30/18
	Estimate the number and type of families that will benefit from the proposed activities	Accomplishments will be tied to specific HOME activities undertaken in PY 2017.
	Location Description	Countywide
	Planned Activities	MDHA costs associated with housing activities that are linked to providing services to owners, tenants, contractors, and other eligible entities participating in or seeking to participate in the HOME program.

12	Project Name	CDBG: Housing: Rental Rehab
	Target Area	Countywide
	Goals Supported	Production of new units & Rehabilitation of existing units
	Needs Addressed	Increase Supply of Affordable Housing Affirmatively Further Fair Housing Choice
	Funding	\$510,000 (carryforward)
	Description	Rehab of existing rental units or acquisition and rehab of units to be added to the affordable housing inventory to be occupied by LMI families.
	Target Date	9/1/16-6/30/18
	Estimate the number and type of families that will benefit from the proposed activities	10 LMI families (≤ 80% AMI)
	Location Description	Countywide
	Planned Activities	Assistance will be provided to qualified landlords/ developers until funding is exhausted to acquire and rehabilitate or rehabilitate substandard rental property to lease to tenants with incomes at or below 80% AMI. Assistance will be provided in the form of a forgivable loan if a landlord agrees to makes units available exclusively for Section 8 voucher holders or extremely low income tenants or special needs populations; otherwise, assistance will be as a low-interest loan. All units must remain affordable and be leased to income-eligible tenants for a minimum 10-year affordability period.

13	Project Name	CDBG: Public Facilities: Neighborhood Facilities
	Target Area	Tier 1 Areas
	Goals Supported	Public Facilities/Public Improvements and Infrastructure
	Needs Addressed	Develop & Implement Place-Based Strategies for CD
	Funding - based on 6% of allocation excluding carryforward funds	\$528,274.54 (\$278,274.54 annual allocation + \$250,000 carryforward funds)
	Description	Financial assistance for construction of a new or expansion and/or rehabilitation of existing neighborhood facilities located in Tier 1 areas owned by a nonprofit or public agency including, but not limited to, community centers, youth centers, senior centers, and parks. Facilities must be open to the general public during normal working hours.
	Target Date	7/1/17-6/30/18
	Estimate the number and type of families that will benefit from the proposed activities	3 Facilities
	Location Description	Tier 1 Areas
Planned Activities	Eligible costs include hard and soft construction costs, energy efficiency improvements and accessibility improvements. Operation and maintenance costs are ineligible. Funds will be made available for specific projects identified by Metro or made available to nonprofits through a competitive process to be announced in the fall of 2017. A portion of the funds may be used to pay for MDHA costs associated with administering the program.	

14	Project Name	CDBG: Public Facilities: Infrastructure Improvements
	Target Area	Tier 2 Priority Areas
	Goals Supported	Public Facilities/Public Improvements and Infrastructure
	Needs Addressed	Develop & Implement Place-Based Strategies for CD
	Funding – not to exceed 6% of allocation	\$296,051.45 (\$278,274.54 annual allocation + \$17,776.91 reprogrammed funds)
	Description	Construction and installation of infrastructure improvements in Tier 2 Priority Areas to connect residents in LMI areas to services
	Target Date	7/1/17-6/30/18
	Estimate the number and type of families that will benefit from the proposed activities	1 Project
	Location Description	Tier 2 Priority Areas
Planned Activities	Improvements include sidewalks and bus stops; projects will be identified in collaboration with the Mayor's Infrastructure Team. A portion of the funds may be used to pay for MDHA costs associated with administering the program.	

15	Project Name	CDBG: Public Services: Summer Youth Program
	Target Area	Countywide
	Goals Supported	Public Service & Economic Development
	Needs Addressed	Provide Summer Programs for LMI Youth
	Funding – not to exceed 10% of allocation	\$442,133 (annual allocation)
	Description	Funding for the eligible costs of new or enhanced Summer Programs for LMI youth ages 6-18 provided by nonprofits or public agencies.
	Target Date	6/1/2017-7/31/2017
	Estimate the number and type of families that will benefit from the proposed activities	2100
	Location Description	Countywide
	Planned Activities	Activities enhance participants' academic, artistic, and athletic interests, as well as promote job skills development and/or healthy lifestyles, to help prepare youth to become successful adults. Funding is awarded through a competitive process. A new component of this program is an initiative of Mayor Barry's office called "Opportunity NOW" that focuses on the need for employment and job training opportunities for youth ages 14 – 15. A portion of the funds may be used to pay for MDHA costs associated with administering the program.

16	Project Name	CDBG: Public Services: Fair Housing
	Target Area	Tier 1 Areas
	Goals Supported	Public Service & Economic Development
	Needs Addressed	Affirmatively Further Fair Housing Choice
	Funding based on 1% of annual allocation	\$35,761 (\$22,845 annual allocation + \$12,916 reprogrammed funds)
	Description	Fair housing counseling, outreach, and education; conduct complaint-based and targeted testing, primarily in Tier 1 areas.
	Target Date	7/1/17-6/30/18
	Estimate the number and type of families that will benefit from the proposed activities	300
	Location Description	Tier 1 Areas
	Planned Activities	Speaking with aggrieved individuals to inform them of their rights pertaining to Fair Housing; interacting with a potentially aggrieved individuals housing provider to determine the housing provider's version of the facts (i.e., investigation.); interacting with a housing provider to inform the housing provider of his or her obligations under applicable law, in order to bring relief to the aggrieved individual; providing legal representation to an aggrieved individual, either as a defendant or plaintiff in housing-related litigation; providing general education information to individuals to inform them of their rights in conjunction with the Fair Housing Laws; providing general educational information to individuals to inform them of their rights in conjunction with the Fair Housing Laws. Funding was allocated through a competitive process to the Tennessee Fair Housing Council, and the contract allows an option to renew for 1 additional term.

17	Project Name	CDBG: Public Services: Healthy Food Initiatives
	Target Area	LMI Food Deserts
	Goals Supported	Public Service & Economic Development
	Needs Addressed	Increase Access to Healthy Food Choices
	Funding – carryforward funds	\$0 (Program operating during the 2017 program year is funded with carryforward funds)
	Description	Public service and outreach/education campaign on making healthy food choices.
	Target Date	7/1/17-6/30/18
	Estimate the number and type of families that will benefit from the proposed activities	45
	Location Description	Metro Nashville LMI census tracts identified as food deserts by the USDA's Economic Research Service.
Planned Activities	Second Harvest Food Bank will provide classes to Seniors residing in Public Housing related to preparing, eating, and shopping for healthy food specifically related to controlling sodium intake, carbohydrates and fiber in the diet.	

18	Project Name	CDBG: Public Services: Services for Homeless Persons
	Target Area	Countywide
	Goals Supported	Public Service & Economic Development
	Needs Addressed	Decrease Homelessness
	Funding – based on 03% of allocation	\$150,000 (annual allocation)
	Description	Services include emergency payment of rent and utilities; facilitate Metro’s encampment response through the operation of a shelter or outreach team
	Target Date	7/1/17-6/30/18
	Estimate the number and type of families that will benefit from the proposed activities	Emergency payments: 125 individuals Encampment Response: 60 individuals
	Location Description	Countywide
	Planned Activities	<ul style="list-style-type: none"> • <u>Emergency Payments</u>: \$130,000 for one-time payments up to \$1000 per client to pay first month’s rent and security and utility deposits for participants of How’s Nashville campaign, Shelter Plus Care and VASH programs, and other local homeless programs. Payments are made directly to landlords and utility companies. • <u>Encampment Response</u>: \$20,000 of the operation of a shelter or to support outreach as part of Metro’s encampment response plan; funding for operations may be awarded on a competitive basis to a qualified nonprofit; funding to outreach may be awarded on a competitive basis or utilized by MHC as a subrecipient.

19	Project Name	CDBG: Other: Nonprofit Organization Capacity Building
	Target Area	Tier 1 Areas
	Goals Supported	Planning
	Needs Addressed	Increase Supply of Affordable Housing Develop & Implement Place-Based Strategies for CD
	Funding - carryforward	\$50,000 (carryforward)
	Description	Technical assistance provided to nonprofits related to building capacity for neighborhood revitalization or economic development.
	Target Date	7/1/17-6/30/18
	Estimate the number and type of families that will benefit from the proposed activities	10 entities annually
	Location Description	Tier 1 Areas
	Planned Activities	MDHA is partnering with the Mayor's Office of Economic Opportunity and Empowerment to provide funding to nonprofit affordable housing developers to build organizational capacity with a focus on affordable housing finance and development that will result in the creation/preservation of affordable housing as a key tool for neighborhood revitalization. Funding will be used to leverage the Barnes Nonprofit Capacity Building Program.

20	Project Name	HOME: Administration
	Target Area	Countywide
	Goals Supported	Planning
	Needs Addressed	Increase Supply of Affordable Housing Affirmatively Further Fair Housing Choice
	Funding – based on 10% of annual allocation + 10% of actual and PI on hand (excluding repayments) as of 5/31/2017	\$206,335 (\$188,183 annual allocation + \$18,152 PI)
	Description	Provide grant management, compliance, and oversight of HOME-funded activities.
	Target Date	7/1/17-6/30/17
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	MDHA Central Office
	Planned Activities	Administrative costs include staff and related costs required for overall program management, coordination, monitoring, reporting, and evaluation. Administrative activities will be undertaken by MDHA.

21	Project Name	HOME: Homeownership: Homebuyer Programs
	Target Area	Countywide
	Goals Supported	Production of new units
	Needs Addressed	Increase Supply of Affordable Housing
	Funding exclusively from PI, reprogrammed and carryforward funds	\$216,768.99 (\$99,701.99 actual PI received and unexpended as of 5/31/17+ reprogrammed \$100,251 + \$16,816 carryforward
	Description	New home construction and downpayment assistance in conjunction with the purchase of homes for LMI households (\leq 80% AMI)
	Target Date	7/1/17-6/30/18
	Estimate the number and type of families that will benefit from the proposed activities	4 (\leq 80% AMI)
	Location Description	Countywide
	Planned Activities	<p>A minimum of 15% of the 2017 allocation, estimated to be \$282,276, will be set aside for eligible CHDO projects. The tenure of the CHDO projects will be based on developer demand and can come from the homeownership or rental project budgets.</p> <p>Funding to developers associated with New Home Construction (including property acquisition costs) and funding available to eligible homebuyers for Downpayment Assistance specifically for the purchase of a home that has been constructed with HOME funds awarded through this activity. . All purchasers must receive/complete homebuyer education through a HUD or THDA approved education provider. MDHA may undertake development or award funds on a first come, first served basis through an open application cycle or on a competitive basis via a Request for Proposals.</p>

22	Project Name	HOME: Homeownership: Homeowner Rehab
	Target Area	Countywide
	Goals Supported	Rehabilitation of existing Units
	Needs Addressed	Increase Supply of Affordable Housing
	Funding	\$0.00 (program is being provided with CDBG funds)
	Description	Assistance for large-scale rehabilitation or reconstruction of owner-occupied units.
	Target Date	7/1/17-6/30/18
	Estimate the number and type of families that will benefit from the proposed activities	See CDBG Homeowner Rehab program.
	Location Description	Countywide
	Planned Activities	See description of CDBG Homeowner Rehab program.

23	Project Name	HOME: Rental: Rental Projects
	Target Area	Countywide
	Goals Supported	Production of new units
	Needs Addressed	Increase Supply of Affordable Housing Develop & Implement Place-Based Strategies for CD Affirmatively Further Fair Housing Choice
	Funding – based on 90% of allocation excluding PI and Carryforward funds	\$1,831,544 (\$1,693,655 annual allocation + \$100,000 actual and PI received and unexpended as of 5/31/17 + \$37,889 carryforward)
	Description	Funding for new construction of properties for rent to households with incomes ≤ 60% AMI
	Target Date	7/1/17-6/30/18
	Estimate the number and type of families that will benefit from the proposed activities	40 units (≤ 60% AMI)
	Location Description	Countywide
	Planned Activities	<p>A minimum of 15% of the 2017 allocation, estimated to be \$282,276, will be set aside for eligible CHDO projects. The tenure of the CHDO projects will be based on developer demand and can come from the homeownership or rental project budgets. MDHA may choose to undertake development or award funds on a first come, first served basis through an open application cycle or on a competitive basis via a Request for Proposals.</p> <p>Financial assistance to developers may be in the form predevelopment loans, construction loans, and permanent financing. Eligible uses of funds include acquisition, site preparation, construction, and soft costs. All new construction projects will be subject to underwriting by MDHA and must meet HOME Site and Neighborhood Standards. Units must be occupied by tenants with incomes at or below 60% AMI. In projects with 5 or more HOME-assisted units, at least 20% of the units must serve households at or below 50% AMI.</p>

24	Project Name	ESG: Administration; Emergency Shelter and Transitional Housing; Rapid Rehousing; Street Outreach; Prevention; HMIS
	Target Area	Countywide
	Goals Supported	Decrease Homelessness, Outreach, Emergency Shelter & Transitional Housing, Permanent Housing and Outreach
	Needs Addressed	Decrease Homelessness
	Funding for activities based on ESG 2017 allocation amounts will comply with regulatory requirements that cap the amount of funds that can be used for Administration and Shelter Operations and Street Outreach Activities	<ul style="list-style-type: none"> • <u>Administration</u>: \$30,784 (funds for this activity will not exceed 7.5% of the 2017 allocation) • <u>Shelter Operations and Street Outreach</u>: funds will be awarded through an RFA process based on agency demand – \$246,273 (will not exceed 60% of the 2017 allocation) • <u>Rapid Re-housing</u>: funds will be awarded through an RFA process based on agency demand. • <u>Street Outreach</u>: funds will be awarded through an RFA process based on agency demand • <u>Prevention</u>: funds will be awarded through an RFA process based on agency demand. • <u>HMIS</u>: \$15,000 (funds for this activity will not exceed 4% of the 2017 allocation)
	ESG Activity Descriptions	<ul style="list-style-type: none"> • Administration • Funding to provide operations and essential services for Emergency Shelters and Transitional Housing; • Services and direct housing assistance to help people who are homeless move quickly into permanent housing and achieve stability in that housing; • Reaching out to unsheltered homeless individuals and families, connecting them with emergency shelter, housing, or critical services, and providing them with urgent, non-facility based care; • Preventing individuals and/or families from losing housing and having to move into emergency shelter or back to the streets, with a priority on people with known histories of homelessness or chronic housing instability; and • HMIS <p><i>See ESG Planned Activities for additional information on each activity.</i></p>
Target Date	7/1/17-6/30/17	

	<p>Estimate the number and type of families that will benefit from the proposed activities</p>	<p>Goals are based on 2016 funded activities:</p> <ul style="list-style-type: none"> • 2000 Persons - Emergency Shelter and Transitional Housing • 300 Persons – Rapid Re-housing • 100 Persons – Street Outreach • 27 Persons – Prevention • 3000 Persons - HMIS
	<p>Location Description</p>	<p>Countywide</p>
	<p>ESG Planned Activities</p>	<ul style="list-style-type: none"> • <u>Administration</u>: staff and related costs for overall program management, coordination, monitoring, reporting, and evaluation. Administrative activities will be undertaken by MDHA staff. • <u>Shelter Operation</u>: including but not limited to maintenance, rent, repair, etc., and other eligible activities as defined in the ESG regulations at 24 CFR, §576.102 (3). • <u>Essential Services</u>: including but not limited to case management, childcare, education services, etc., and other eligible activities as defined in the ESG regulations at 24 CFR, §576.102 (1). • <u>Rapid re-housing assistance</u>: including but not limited to utilities, rental application fees, security deposits, etc. and other eligible activities as defined in the ESG regulations at 24 CFR, §576.104; §576.105 (Housing relocation and stabilization services) and §576.106 (Short-term and medium-term rental assistance). • <u>Street Outreach</u>: including but not limited to cost of engagement, case management, emergency health and mental health, etc. and other eligible activities as defined in the ESG regulations at 24 CFR, §576.101. • <u>Prevention</u>: including but not limited to rental assistance (such as arrears) and housing relocation and stabilization services, etc. and other eligible activities as defined in the ESG regulations at 24 CFR, §576.103. • <u>HMIS</u>: Costs associated with maintaining HMIS, including software, data review, input, and quality control reporting. The activity will be performed by MDHA staff.

	ESG Planned Activities (continued)	Funding for all activities will be awarded to qualified nonprofits through a competitive process to be announced late March/early April, 2017. Proposals will be evaluated by a Review Committee comprised of MDHA staff, representatives of programs that serve homeless persons, homeless or formerly homeless individuals or individuals that are knowledgeable about various aspects of the ESG program. Proposals will be evaluated in accordance with the evaluation criteria contained in the RFA and ranked from highest to lowest. Funding will be awarded for projects according to their overall rank until funding is exhausted.
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25	Project Name	HOPWA: Administration; Facility-Based Operations; Short-term Rent, Mortgage, and/or Utility Payments (STRMU); and Supportive Services
	Target Area	Metropolitan Statistical Area
	Goals Supported	Housing Opportunities for Persons with AIDS
	Needs Addressed	Provide Housing Assistance for Persons with HIV
	Funding for activities based on HOPWA 2017 allocation amounts will comply with regulatory requirements that cap the funds for Administration	<ul style="list-style-type: none"> • <u>Administration</u>: \$107,347 (funds for this activity will not exceed 10% of the 2017 allocation); \$32,204 (3%) will be retained by MDHA & \$75,143 (7%) will be awarded to agencies through an RFP • The balance of funds (\$966,126) will be awarded to agencies through an RFA process based on demand: <ul style="list-style-type: none"> ○ Facility-Based Operations ○ Short-term Rent, Mortgage, and/or Utility Payments (STRMU) ○ Supportive Services
	HOPWA Activity Descriptions	<ul style="list-style-type: none"> • <u>Administration</u>: Provide grant management, compliance and oversight of HOPWA-funded programs. • <u>Facility-Based Operations</u>: Support to facilities, including community residences, SRO dwellings, short-term or transitional facilities, project-based units, master leased units, scattered site units leased by the Sponsor, and other facilities approved by HUD. • <u>Short-term Rent, Mortgage, and/or Utility Payments (STRMU)</u>: Time-limited housing assistance designed to prevent homelessness and increase housing stability for a period of up to 21 weeks in any 52-week period. See planned activities below. • <u>Supportive Services</u>: Services supporting the housing stability program participants. <p>See HOPWA Planned Activities for additional information on activities.</p>
	Target Date	7/1/17-6/30/18
	Estimate the number and type of families that will benefit from the proposed activities	Goals are based on 2016 funded activities: <ul style="list-style-type: none"> • 42 households - Facility-Based Operations • 334 households – Short-term Rent, Mortgage, and/or Utility Payments (STRMU) • 1488 - Supportive Services
	Location Description	MSA

<p>HOPWA Planned Activities</p>	<ul style="list-style-type: none"> • <u>Administration</u>: staff and related costs for overall program management, coordination, monitoring, reporting, and evaluation. \$32,204 or 3% of the allocation will be retained by MDHA. Remaining funds of \$75,143 or 7% of the allocation will be awarded to Sponsors selected through an RFA process. • <u>Facility-Based Operations</u>: eligible costs include costs of operation of housing such as maintenance, security, operation, insurance, utilities, furnishings, equipment, supplies, and other incidental costs. • <u>Short-term Rent, Mortgage, and/or Utility Payments (STRMU)</u>: assistance varies per client depending on funds available, tenant need, and program guidelines. All rent and mortgage assistance payments must be reasonable and represent actual housing costs. • <u>Supportive Services</u>: supportive services include, but are not limited to, health, mental health assessments, permanent housing placement, drug and alcohol abuse treatment and counseling, day care, personal assistance, nutritional services, intensive care when required, and assistance in gaining access to local, State, and Federal government benefits and services, except that health services may only be provided to individuals with acquired immunodeficiency syndrome or related diseases and not to family members of these individuals. <p>All funds will be awarded to Sponsors selected for funding through an RFA to be issued late March/early April, 2017. Proposals will be evaluated by a Review Committee comprised of MDHA staff, representatives of programs that serve persons living with HIV/AIDS, or individuals that are knowledgeable about various aspects of housing services in accordance with the evaluation criteria contained in the RFA and ranked from highest to lowest. Funding will be awarded for projects according to their overall rank until funding is exhausted.</p>
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Table 9 – Project Summary

AP-50 Geographic Distribution – 91.220(f)

Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

Under the tiered Placed-Based Strategy introduced in Substantial Amendment 1, a portion of CDBG funds will be targeted to areas with high concentrations of poverty to help spur investment in these areas.

• Tier 1 Areas

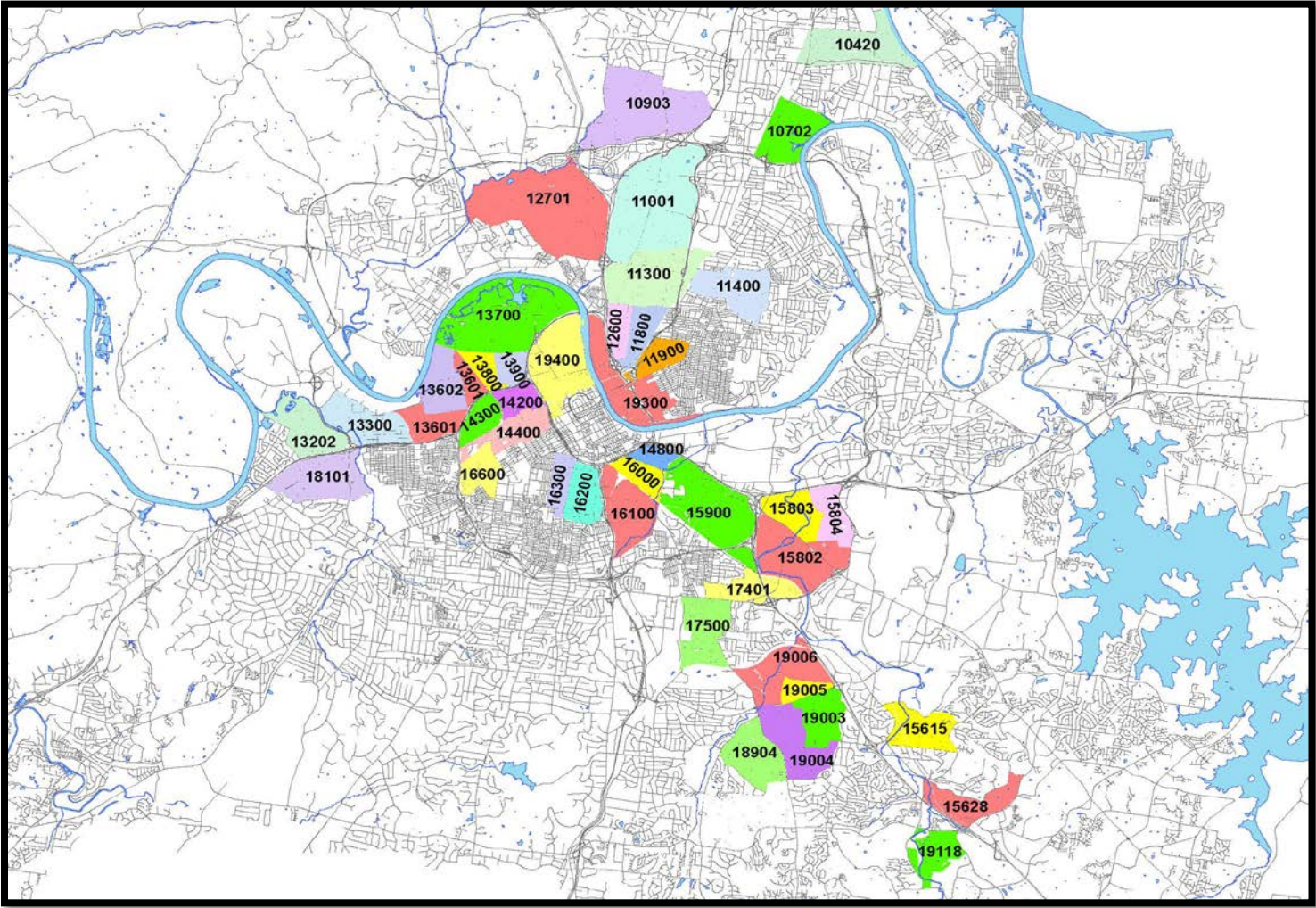
Tier 1 areas are census tracts where at least 65% of households are at or below 80% AMI or are part of a Tier 2 Priority Area. Tier 1 census tracts are listed below and are based on the latest data from the American Community Survey. A map showing all Tier 1 census tracts is provided on the following page. Detailed maps of each Tier 1 census tracts are provided in Exhibit 4. See Exhibit 5 for directions on determining the census tract number for a specific parcel/address.

010402	010702	010903	011001	011300	011400	011800	011900
012600	012701	013202	013300	013601	013602	013700	013800
013900	014200	014300	014400	014800	015615	015628	015802
015803	015804	015900	016000	016100	016200	016300	016600
017401	017500	018101	018904	019003	019004	019005	019006
019118	019300	019400					

The following programs will be available in Tier 1 areas:

- Commercial Rehab (Façade Loans)
- Business Technical Assistance
- Microenterprise Assistance
- Neighborhood Facilities
- Fair Housing Outreach, Education, and Testing
- Nonprofit Capacity Building.

Tier 1 Census Tracts



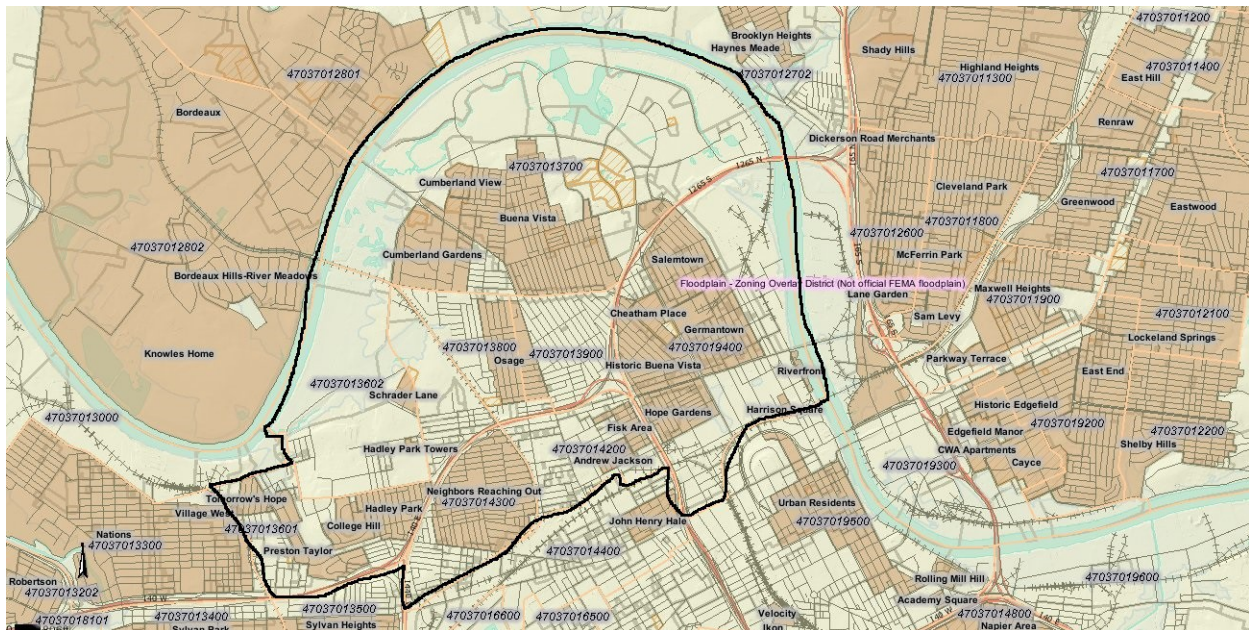
- **Tier 2 Priority Areas**

MDHA, with the support of a HUD-approved technical assistance provider, undertook a data-driven analysis in order to identify which neighborhoods(s) in Davidson County should be targeted for concentrated place-based investment activities. From this analysis, the North Nashville subarea (as outlined on the map and listed in the table below) was selected as the first Tier 2 Priority Neighborhood. During the 2013 and 2014 Program Years, MDHA invested CDBG funds for sidewalk improvements in North Nashville and began outreach, through a contracted partner (Neighborhoods Resource Center) to identify blocks to implement the targeted rehab program. In 2015, MDHA rolled-out the targeted rehab program and began construction on new apartments at 10th & Jefferson.

Tier 2 – North Nashville Census Tracts

013601	013602	013700	013800	013900	014200	014300	019400
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Tier 2 – North Nashville Map

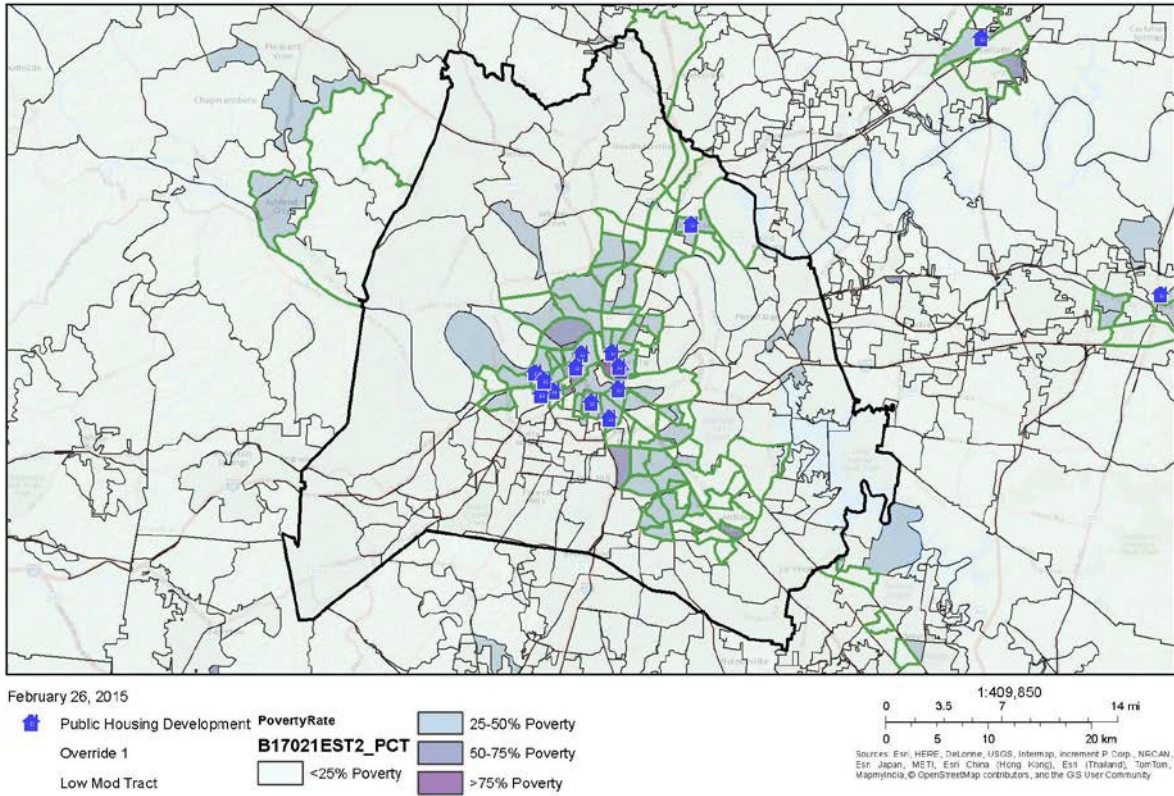


In the 2015 Annual Action Plan, MDHA added census tracts in which public housing properties are located as Tier 2 Priority Areas. As shown on the map below, many public housing sites are located in areas with very high concentrations of poverty.

Tier 2 Public Housing Census Tracts

010402	011800	011900	013601	013602	013700	014200
014400	014800	016100	016200	016300	016600	019300
019400						

CPD Maps - Public Housing Locations & Poverty Rates



See Exhibit 4 for maps of each census tract listed above.

In addition to the programs available to the Tier I areas, the following programs will be available **only** in Tier 2 areas:

- Acquisition and related activities
- Infrastructure Improvements (Residential areas)
- Targeted Housing Rehab
- Planning.

Note: Business Technical Assistance and Microenterprise Assistance programs will be required to target outreach to residents of public housing.

- **Other Geographic Priorities**

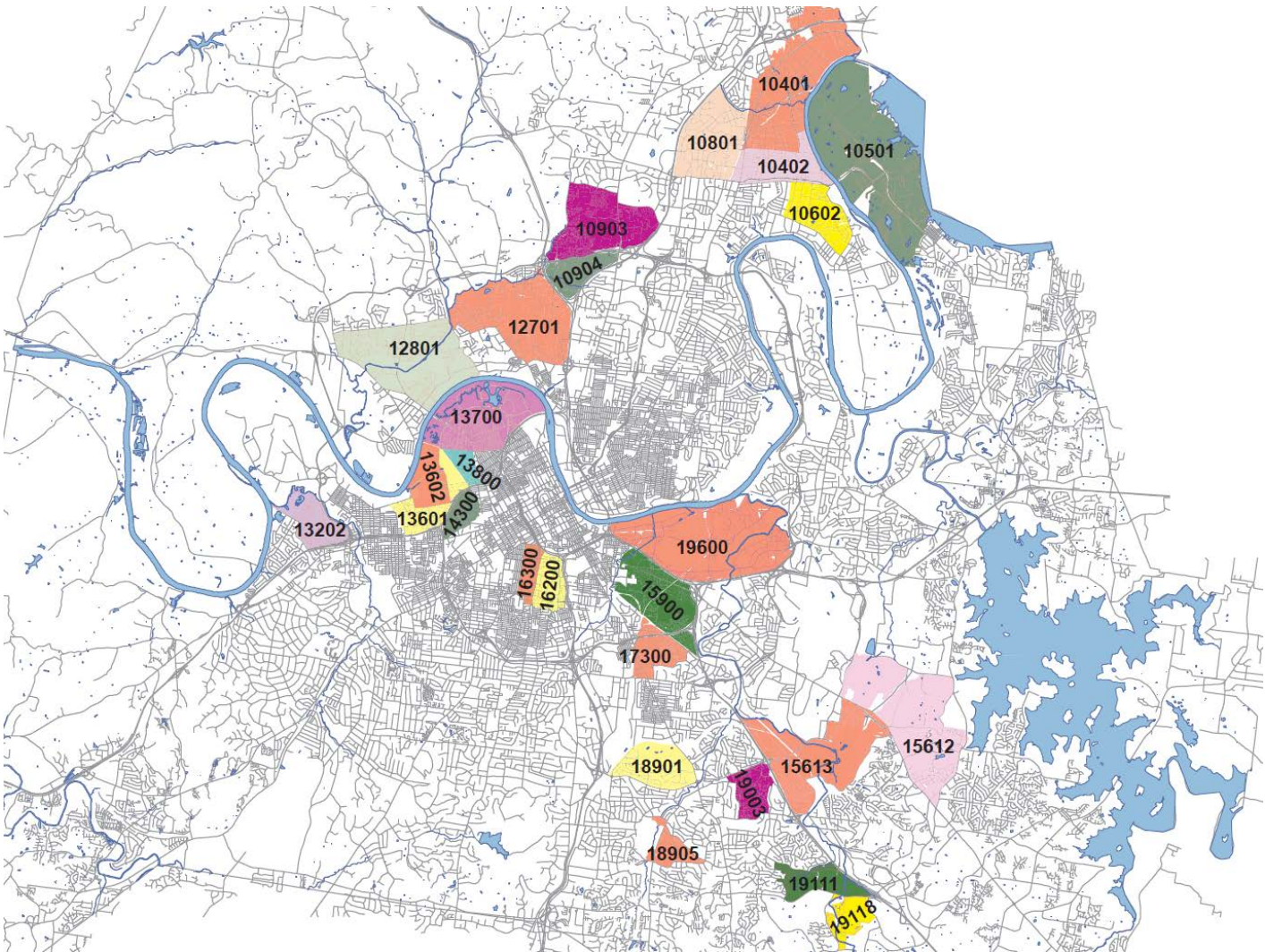
Food Deserts

One of the priorities listed in the Consolidated Plan is to “increase access to healthy food choices”. Many low-income neighborhoods of Metro Nashville can be categorized as “food deserts” - area where residents have limited access to healthy and affordable food. A food desert is defined by the USDA as a low-income census tract (tract with a poverty rate equal to or greater than 20%, or a median family income that is 80% or less of the metropolitan area’s median family income) in which a substantial proportion of the population has low access (at least 500 people or 33% of the population is located more than one mile (urban) or 10 miles (rural) from the nearest supermarket or large grocery store). Concentrated poverty and the percent of minority populations are critical factors in determining low access. Also, areas with lower vehicle availability and public transportation access have a higher likelihood of being in a food desert. A portion of 2016 CDBG funds were allocated for healthy food initiatives in the following LMI Census Tracts that are also designated as Food Desert Areas based on the latest data from American Community Survey. This program will operate during the 2017 program year under an existing contract with Second Harvest Food Bank. *Note: Although a census tract may be labeled as a Food Desert by the USDA, it is eligible for CDBG funds **only** if 51% of households have incomes at or below 80% AMI. These “LMI Food Desert Tracts” are listed below, and a map is provided on the following page.*

LMI Food Desert Census Tracts

010401	010402	010501	010602	010801	010903	010904	012701
012801	013202	013601	013602	013700	013800	014300	015612
015613	015900	016200	016300	017300	018901	018905	019003
019111	019118	019600					

LMI Food Desert Map



Housing for Persons with AIDS

The only program that is administered by MDHA that would lend itself to providing services to those who may not be located within the Metro Nashville-Davidson County boundary is through the disbursement of HOPWA funding. This funding stream is distributed through the broader metropolitan area, including Cannon, Cheatham, Davidson, Dickson, Hickman, Macon, Robertson, Rutherford, Smith, Sumner, Trousdale, Williamson, and Wilson Counties. HOPWA funds are not intended to be targeted towards a specific geographic area, but rather towards a specific population, which is people living with AIDS/HIV and their families.

Geographic Distribution

Target Area	Percentage of CDBG Funds
Tier 1 Areas	5%*
Tier 2 Priority Areas	5%**
LMI Census Tracts also designated as Food Desert Areas	0%*
Target Area	Percentage of HOPWA Funds
Metropolitan Statistical Area (MSA)	100%

Table 10 - Geographic Distribution

*Percentages based solely on 2017 funding allocated to activities in Tier 1, 2, and LMI Census Tracts designated as Food Desert Areas and do not reflect funding for activities in these areas being carried out with carryforward or prior year funds.

** % is exclusive of Tier 1 funding that is available.

Rationale for the priorities for allocating investments geographically

Significant issues identified during the planning process included the uneven distribution of community resources and the concentration of poverty. Many high-poverty neighborhoods are not able to leverage resources or attract investment that is necessary to stabilize the area, improve quality of life, and create opportunities. To help address this issue, MDHA introduced the “place-based” approach for targeting its community development efforts rather than distributing limited funds throughout the County. MDHA worked with a HUD-approved technical assistance provider to develop a two-tiered Place-Based Strategy. The purpose of the tiered approach is to provide funding to spur investment in eligible census tracts.

Via HOPWA funding to Nashville CARES, STRMU assistance and supportive services (including medical case management, transportation) are provided to clients throughout 13 counties in the Middle Tennessee region. Nashville CARES is the largest HOPWA sponsor agency, & utilizes medical case managers as the access point for all HOPWA services throughout this region.

ESG funds are allocated to an array of nonprofit shelter agencies, with locations that are scattered throughout Nashville-Davidson County.

The majority of CDBG and HOME funds are distributed on a countywide level. Because very few areas of the County are affordable to extremely low-income persons, funding for the creation and preservation of affordable housing is not limited to a specific area within a jurisdiction. Further, project proposers are evaluated, in part, on their proximity to services and transportation. The Countywide Homeowner Rehab and HVAC Installation/Replacement programs are designed to preserve existing affordable housing by allowing elderly, disabled, and low-income homeowners to receive the necessary assistance to make health and safety repairs.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

Scarcity of affordable rental units was an impediment identified in the 2013 Analysis of Impediments to Fair Housing Choice and was a common thread among all consultations during the 2017 planning period. This issue is being discussed and reviewed by a number of groups throughout the area and was studied heavily by the Metro Planning Department during the NashvilleNext process. Additionally, in August, 2015 Metro Nashville awarded a contract to Economic and Planning Systems, Inc. to prepare a Housing Policy and Inclusionary Zoning Feasibility Study Report. The goal of commissioning this study was to understand the practical options for structuring a locally-relevant inclusionary housing policy based on a comprehensive and detailed economic and policy analysis of inclusionary housing policy options. This report was completed in March 2016 and as a result of this study, Metro Council passed inclusionary housing legislation on September 6, 2016.

In July of 2016 Metro Council directed the Mayor’s Office of Economic Opportunity and Empowerment to work with the Council’s Ad Hoc Affordable Housing Committee to develop and implement a comprehensive plan to address the issue of housing affordability in Nashville and Davidson County. This plan, called the “Housing Nashville Report” was released in May 2017. This plan coordinates and builds upon the research and policy recommendations of existing plans and identifies the needs and gaps of affordable and workforce housing in Nashville’s neighborhoods and provides a road map for addressing the needs in an equitable and coordinated fashion and with a provision for a regular re-evaluation of the stated goals. This plan will largely determine how local resources to address housing needs are allocated.

The greatest need continues to be among households with very low incomes, persons with disabilities, and families. As a result, CPD affordable housing programs are designed to address these needs within the Federal guidelines.

Note: Housing assistance, as discussed in this section, does not include emergency shelter, transitional shelter, street outreach, or supportive services.

One Year Goals for the Number of Households to be Supported	
Homeless	452
Non-Homeless	186
Special Needs	334
Total	972

Table 11 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	786
Production of New Units	44
Rehab of Existing Units	140
Acquisition of Existing Units	2
Total	972

Table 12 - One Year Goals for Affordable Housing by Support Type

Discussion

A summary of affordable housing activities to be undertaken this program year is listed below:

- **Rental Assistance**

- **Rapid Re-housing (ESG):** Services and direct housing assistance to help people who are homeless move quickly into permanent housing and achieve stability in that housing. Eligible costs include utilities, rental application fees, security deposits, last month's rent, utility deposits and payments, moving costs, housing search and placement, housing stability case management, landlord-tenant mediation, tenant legal services, and credit repair.
- **Prevention (ESG):** Assistance to prevent individuals and/or families from losing housing and having to move into emergency shelter or back to the streets, with a priority on people with known histories of homelessness or chronic housing instability. Eligible activities include rental assistance (such as arrears), housing relocation and relocation services.
- **Services for the Homeless (CDBG):** Funds will be made available to assist persons participating in How's Nashville, Shelter Plus Care, VASH, and other local homeless initiatives to obtain housing. One-time assistance will provide up to \$1,000 per client for first month's rent and rental and utility deposits. Funds are provided directly to the landlord and utility provider.
- **Short-term Rent, Mortgage and Utilities (STRMU) (HOPWA):** Time-limited housing assistance designed to prevent homelessness and increase housing stability for a period of up to 21 weeks in any 52-week period. The amount of assistance varies per client depending on funds available, tenant need, and program guidelines. Rent and mortgage assistance payments must be reasonable and represent actual housing costs.
- **Project-Based Vouchers:** In order to increase the supply of affordable rental housing, MDHA made a decision to convert up to 900 of their housing choice vouchers to project-based vouchers and issued an open RFP in the fall of 2016 soliciting proposals from owners and/or developers of new or existing housing to

allow them to apply for these project-based vouchers to provide rental assistance to tenants that would occupy their housing units.

- **Landlord Incentive Program – Veterans Affairs Supportive Housing (VASH Program):** Metro Nashville is funding an incentive program to encourage owners/landlords of property in Davidson County to rent their units to homeless Veterans that are eligible for rental assistance under MDHA VASH program. There are two components to the program, a lease signing bonus and eligibility for payment of unpaid rent or damages after a VASH participant moves from a unit.

- **Production of New Units (HOME only)**

HOME funds are the only source of funds available for new construction; for this reason, MDHA elected to allocate HOME funds for new construction rather than for rehab. (Funding for rehab of homeowner and rental projects will be available through CDBG.) During the program year, MDHA will make available HOME funding opportunities for nonprofit and for profit development partners or elect to undertake development of affordable housing for rent or homeownership. Financial assistance may be in the form of predevelopment loans, construction loans, and permanent financing. Eligible uses of funds may include acquisition, site preparation, construction, soft costs and down payment assistance to purchasers acquiring units constructed with HOME funds. All projects are subject to underwriting by MDHA in accordance with HOME program regulations. New construction will adhere to HUD's guidance on broadband infrastructure.

See: <https://www.federalregister.gov/documents/2016/12/20/2016-30708/narrowing-the-digital-divide-through-installation-of-broadband-infrastructure-in-hud-funded-new>.

- **Rental Projects:** All HOME assisted rental projects must serve households with incomes at or below 60% AMI. In projects with 5 or more units, at least 20% of the units must serve households with incomes at or below 50% AMI. Priority is established for projects serving households at or below 30% AMI and large families. New construction rental projects must meet HOME Site and Neighborhood Standards.
- **Homeownership:** On February 7, 2017, HUD issued 2017 homeownership value limits for the HOME program. Upon reviewing the new limits, MDHA became concerned that the HUD-provided limits were much lower than the current Nashville market. Review of local housing data substantiated these suspicions. As a result, MDHA is submitting documentation in Appendix B of this Action Plan seeking HUD approval to allow MDHA use local value limits established in accordance with the requirements and methodology outlined at 24 CFR 92.254(a)(2)(iii). Based on the data provided using the prescribed methodology, 95% of the median purchase price limit will be \$265,290 for single family existing construction and \$341,999 for single family new construction. These are the value limits MDHA will utilize to ensure homes acquired with HOME funds comply with modest housing requirement of 24 CFR 92.254. All Homes must be sold to

households with incomes at or below 80% AMI. In accordance with HOME regulations, if a home is not sold within 6 months of completion, the home must be rented to a household at or below 80% AMI.

- **Rehab of Existing Units**

- **Homeowner Rehab Program:** Homeowners with household incomes at or below 80% AMI may apply for assistance for household repairs to address health and safety issues. Due to the demand for assistance, priority will be given to homeowners whose incomes are at or below 50% AMI, persons with disabilities, and the elderly (age 62+).
 - Countywide Rehab Program (with targeted outreach to areas of the County deemed recently underserved): CDBG funds will be used to complete home repairs to eliminate health and safety issues, such as lack of heat/air, roof repair, plumbing, accessibility, lead and/or asbestos removal, etc. This assistance will be made available to qualified homeowners and be treated as a forgivable loan for elderly (62+) homeowners and a deferred (due on sale) loan for non-elderly homeowners.
 - Targeted Rehab Program: MDHA, through its contracted partner Neighborhoods Resource Center and the community, identified streets within North Nashville (Tier 2 Priority Area) to be targeted for the improvements associated with this activity. The construction/project management coordination services for this project are being handled by the nonprofit organization, Rebuilding Together Nashville, selected through the procurement process. 14 applications are currently in various processing stages; 1 home has been completed; 3 homes have contracts pending. Assistance is provided as a grant and includes repairs to address health and safety needs, such as heat/air, roof repair, plumbing, electrical, and accessibility and exterior aesthetic improvements (excluding landscaping). Priority is being given to homeowners whose incomes are at or below 50% AMI, persons with disabilities, and the elderly (age 62+). Homeowners may apply during the open application period, and funds will be allocated on a first-come, first-serve basis to eligible households until funding is exhausted.
 - HVAC Installation/Replacement Program: CDBG funds will be used to expedite installation or repair/replacement of nonfunctioning HVAC systems for homeowners with incomes at or below 80% AMI.
 - Rental Rehab: CDBG funds will be used to provide assistance to landlords and developers to acquire and rehabilitate or rehabilitate substandard rental property to lease to tenants with incomes at or below 80% AMI. Input received through 2017 Action Plan consultations indicated the lack of rental units and refusal of landlords to accept Section 8 vouchers as a primary barrier to retaining/maintaining the existing affordable housing inventory.

These consultations also indicated that rehabilitation of rental units needed to be a priority activity to address affordable housing. This assistance will be provided in the form of a low interest loan or a forgivable loan. If a landlord agrees to make their units available exclusively to Section 8 Voucher holders for a minimum 10-year affordability period, the assistance will be provided in the form of a forgivable loan. If a landlord wishes to rent to other income eligible tenants and not exclusively to Section 8 Voucher holders for a minimum 10 affordability period, the assistance will be provided in the form of a low interest loan. Structuring the assistance as a forgivable loan for landlords that agree to exclusively lease to Section 8 Voucher holders will hopefully act as an incentive to increase the number of standard units that are available for lease by Section 8 Voucher holders. MDHA will also provide rental rehab assistance as a forgivable loan to nonprofit agencies that agree to renovate and lease their property to special needs populations for a minimum of 10 years.

Projects with substantial rehab will adhere to HUD's guidance on broadband infrastructure. See: <https://www.federalregister.gov/documents/2016/12/20/2016-30708/narrowing-the-digital-divide-through-installation-of-broadband-infrastructure-in-hud-funded-new>.

- **Acquisition of Existing Units**
 - **Acquisition:** MDHA may utilize CDBG funds to acquire property in Tier 2 Priority Areas for affordable housing.
- **Barnes Housing Trust Fund:** MDHA will continue to collaborate with the Metropolitan Trust Fund Commission on the best way to align the use of HOME and Barnes Funds.
- **CHDO Set-Aside:** A minimum of 15% of the 2017 HOME allocation, estimated to be \$282,276, will be set aside for CHDOs to undertake affordable housing development and eligible CHDO projects. The tenure of the CHDO projects will be based on developer demand and can come from the homeownership or rental project budgets. To assist organizations with their capacity needs, MDHA will continue to provide technical assistance as needed.
- **RAD Set Aside:** MDHA may choose to use a portion of HOME funds from the rental project budget for new construction of affordable housing as part of the redevelopment of MDHA-owned properties that have been converted under RAD.

AP-60 Public Housing – 91.220(h)

Introduction

MDHA is the Public Housing Authority (PHA) for Nashville. MDHA's Affordable Housing Department oversees Metro Nashville's public housing stock, including the administration and maintenance of 5,399 public housing units which provide housing for more than 13,497 persons. In 2017, MDHA plans to continue the online application process, but instead of a lottery, an online applicant portal will be assigned for each property allowing each property to individually manage their waitlist. The applications will be date stamped and processed in chronological order. MDHA is also proposing to change the application process to the following:

- Once the applicant is selected from wait list, property management will try to contact the applicant using the contact information provided by the applicant (telephone and email).
- If the attempted contact is not successful, within 24 hours of attempted contact, property management will forward a letter by first class U.S. mail requesting that the applicant contact property management within 10 days from the date of the letter. The next applicant on the wait list will be contacted the initiate application processing.
- If the applicant fails to contact the office by telephone within the prescribed time period, their pre-application will be removed from the wait list.

In preparation of transitioning to Yardi Affordable Housing module, in accordance with the current Admission and Continued Occupancy Policy the current wait-list pools were purged in March, 2016. MDHA opened waitlists by property type (family, contemporary, elderly, and elderly and disabled), asked applicants to select the specific property in which they were interested in applying, and developed a list of applicants for each specific property. Applications will be processed chronologically using date and time order. Upon closing the waitlist, each individual public housing property wait list will be transferred to the RAD affordable housing wait list. MDHA will no longer maintain a central pool of applicants.

MDHA's Rental Assistance Department administers the Section 8 Housing Choice Voucher and Moderate Rehabilitation Programs. In 2016, MDHA provided rental assistance through the voucher program to over 6,900 households. The Rental Assistance Department strives to reach an annual utilization rate of at least 99% of all voucher funding. To provide more housing choices for its eligible voucher recipients, the Department has set a goal to recruit at least 25 new property owners to the voucher program each year.

MDHA continues to use the online only system for taking application. The online system provides another advantage because applicants can apply from the comfort of their own homes and be assisted by friends and family. This process saves them both time and travel expense. Additionally, if they are working with service providers, the provider can assist them with the application process from their office. In one week period in August 2015, Rental Assistance accepted applications for HCV and received over 15,000 online applications.

In 2013, MDHA HCV program established a preference for persons referred by the Metro Homelessness Commission as part of the “How’s Nashville” Campaign and pledged up to 18 vouchers per month for participants. MDHA is continuing this program in 2017.

Actions planned during the next year to address the needs to public housing

As evidenced by the number of applicants on the waiting list for Section 8 rental assistance and the lack of available units for public housing for families, the most immediate need of those qualified to receive public housing or rental assistance is an increased supply of available rental units.

MDHA has established the following goals to address the needs of its public housing population: Increase the number of public housing family self-sufficiency units by 453 (this goal has been exceeded, the current cumulative total is 619; 118 new households were added during the last 12-month reporting period); audit 20% of all public housing resident files annually to reduce instances of income discrepancies and inaccurate rent calculations; and attract at least 25 new property owners to the Section 8 Housing Choice Voucher program. 111 new landlords were added as of FY ending 9/30/2016. The Rental Assistance office plans to continue to hold landlord meetings on a regular basis to encourage landlords to participate in the program and make affordable units available to participants. In addition, Rental Assistance received set-aside funding to increase housing opportunities for homeless Veterans and a Program Outreach Coordinator was hired in February, 2016. Rental Assistance received another year of set-aside funding for 2017 and will continue to employ the Program Outreach Coordinator.

In August 2016, MDHA issued a Request for Proposals for project-based voucher funding for up to 200 units. MDHA plans to convert up to 200 of its tenant-based vouchers to project-based vouchers in an effort to increase the supply of affordable housing.

Rental Assistance plans to open the Section 8 waiting list in August or September 2017.

MDHA also aims to increase the number of participants in the Family Self-Sufficiency program and establish new partnerships annually with agencies that promote aspects of family self-sufficiency (homeownership, budget management, career development, job training and readiness) in order to help families transition to economic independence and thereby reduce the demand for public housing assistance.

In December 2013, MDHA applied to HUD to convert Metro Nashville's entire portfolio of public housing properties to Project-Based Rental Assistance through the Rental Assistance Demonstration (RAD) Program. MDHA received notice in December 2014 that its application for the RAD program has been approved. As a result, MDHA has begun the process of converting to Project-Based Rental Assistance under the guidelines of PIH Notice 2012-32, REV-1 and any successor Notices and will close on the first property in July 2016.

RAD was designed by HUD to assist in addressing the capital needs of public housing by providing MDHA with access to private sources of capital to repair and preserve its affordable housing assets. Although MDHA is proposing to convert Metro Nashville's entire portfolio of public housing properties under RAD; it is expected that the conversion of different properties will occur at different times as final negotiations are completed with HUD, but all conversions are expected to be completed by Fall 2017.

A portion of the 2017 HOME allocation may be used for new construction in conjunction with RAD. MDHA is moving forward with its Envision Cayce Plan with 70 new units of public housing under construction and new mixed-income housing under design for the former Kirkpatrick Park. The plan is available at: <http://www.nashville-mdha.org/?p=1616>. MDHA received a 9% 2016 Low Income Housing Tax Credit Allocation at Cheatham Place, and we anticipate applying for another 9% allocation for 2017.

A portion of CDBG funds have been allocated to address the needs of public housing residents. CDBG funds were provided via an agreement with Pathway Lending, a Community Development Financial Institution, in 2015 to operate a 2-year program to provide business technical assistance and training directly to businesses, with an emphasis being placed on disadvantaged business, and business opportunities for public housing residents including opportunities for Section 3 Businesses. This program has been very popular and will continue into the 2017 PY and will be expanded to include microenterprise assistance. Healthy Food Initiatives in the 2017 PY will provide an education program to residents of Hadley Park Towers, an elderly and disabled public housing property. Nonprofits applying for funding for Summer Youth programs are encouraged to recruit youth living in public housing. MDHA continues to engage in planning activities for the potential redevelopment of properties.

MDHA's grant writer is actively pursuing funding opportunities that can benefit public housing residents. As a result of these efforts, in June 2016, MDHA was awarded three significant awards.

- First was a \$350,000 Nursing Diversity Workforce Program grant to address the lack of diversity in the nursing workforce by using evidence-based strategies to improve retention and academic achievement of students from disadvantaged backgrounds. This program represents collaboration between MDHA, the Tennessee College of Applied Technology-Nashville's Practical Nursing Program, the Martha O'Bryan Center, and the Nashville Financial Empowerment Center.

- Second was a \$500,000 Choice Neighborhoods Planning grant to support the development of a comprehensive neighborhood transformation plan to revitalize the adjacent and distressed public housing developments of Napier Place and Sudekum Homes. Co-applicants MDHA and the Martha O'Bryan Center will lead an inclusive group of residents and community stakeholders through a two-year planning project to build locally driven solutions to address the challenges that plague this neighborhood such as poor quality housing, inadequate schools, poor health, high crime, and lack of capital. By focusing on the three core goals of housing, people, and neighborhood, the final Transformation Plan will guide the revitalization of public housing while simultaneously directing the transformation of the surrounding neighborhood and build positive outcomes for families.
- Third, was a 10-year Promise Zone designation to revitalize high-poverty communities by creating jobs, increasing economic activity, improving educational opportunities, reducing violent crime, leveraging private capital, and assisting local leaders in navigating federal programs. The Nashville Promise Zone represents collaboration between the Metropolitan Development and Housing Agency (MDHA), the Office of Mayor Megan Barry, six implantation partners, and 87 supporting partners which include a comprehensive group of leaders from government, local institutions, nonprofits, and community organization. These promise zone partners have come together to undertake a collaborative effort to socially and economically transform the community.

Additional grants being pursued during the 2017 Program Year that will benefit public housing residents, if received, are as follows:

- Nursing Workforce Diversity Program Grant renewal application to address the lack of diversity in the nursing workforce by using evidence-based strategies to improve retention and academic achievement of students from disadvantaged backgrounds.
- Youth Homelessness Demonstration Project to provide funds to develop and implement a community approach to prevent and end youth homelessness through a comprehensive system of care for young people rather than implementing individual or unconnected projects that serve this population.
- HUD Safety and Security Grant to provide funds to address emergency capital needs to improve safety and security measures necessary to address crime and drug-related activity that threaten the health and safety of public housing residents.
- Byrne Criminal Justice Innovation Program Grant to support community stakeholders and public housing residents as they develop a plan to address neighborhoods that have disproportionately high crime rates compared to the rest of the city. This program helps the community develop place-based initiatives that strengthen the capacity of residents and organizations so that they

are able to implement comprehensive strategies to revitalize an entire neighborhood or community to create lasting change for its residents.

- Juvenile Reentry Assistance Program Grant will support legal services for youth up to age 24 to help improve chances for reentry, reduce recidivism, and address the challenges the youth face while trying to reintegrate into their communities.

Additionally, MDHA is involved in the national ConnectHome Initiative to bring technology to public housing residents. ConnectHome is a HUD initiative to increase broadband internet access to HUD assisted communities. MDHA has committed to pay internet access service fees for up to 100 residents of Cayce Place Apartments for one year.

In December 2016 Mayor Barry and representatives from HUD joined MDHA and Sanderling Renal Services for a ribbon cutting ceremony and opening of the Sanderling Dialysis Clinic located in the Atchison Community Center at Historic Preston Taylor Apartments, an MDHA public housing community. This dialysis clinic is thought to be the first of its kind on the grounds of a public housing entity. This innovative and collaborative public-private partnership will improve the quality of life for MDHA residents and nearby neighbors by creating easier access to health care, better health and career opportunities. Sanderling Renal Services has committed to provide public housing residents with the opportunity to serve as paid students in a training program that will lead to certification as a Hemodialysis Patient Technician. During the training program, expected to last 6-8 months, residents will be eligible to receive full benefits including health care, and once they pass the certification examination, residents will receive a pay increase comparable to other certified Hemodialysis Patient Technicians in the area. Four MDHA residents have already been hired as dialysis technician trainees. This partnership benefits all parties, and once proven successful, MDHA hopes to replicate it at another site.

MDHA is currently compliant with all fair housing and civil rights requirements and is not under a Voluntary Compliance Agreement.

Actions to encourage public housing residents to become more involved in management and participate in homeownership

MDHA provides multiple opportunities for public housing residents to be involved. Two membership positions on the MDHA Board of Commissioners are filled by public housing residents. Residents also serve as officers on the Resident Association Board at each of MDHA's public housing properties. In addition to serving as community leaders, residents are also encouraged to participate in and support activities and workshops sponsored by their respective resident associations. Property Management and the Social Services Division work in tandem with Resident Association leaders to develop and launch community events.

The Social Services Division of the Affordable Housing Department serves a vital role at MDHA properties. The Social Services Team will continue in 2017 to assist Property Managers with home inspections, one-on-one resident conferences and home visits. Social Services team members also provide on-site budgeting and money

management classes, make referrals for community service hours, referrals for supplemental/emergency food and infant products, provide crises intervention, and rental assistance for those at risk of being evicted. The team also host valuable events, activities, workshops and trainings designed to foster growth and self-sufficiency among residents. In addition, MDHA social services professionals form valuable partnerships with service providers to bring beneficial services to MDHA properties. Among these valuable partnerships are those formed specifically to assist residents who aspire to become homeowners. MDHA's team of social services professionals have a crucial role in the homeownership process for our families including but not limited to: enrolling them in homeownership classes, linking them with organizations who match the dollars they save for homeownership, assisting with credit repair and reducing debt, fostering relationships with sound lenders, helping them determine the best home for their family's needs and financial resources, assisting with the gathering of documents for the mortgage process, providing "sweat equity" on behalf of residents approved for homeownership by Habitat for Humanity and helping residents establish a post-purchase budget that's instrumental in managing the new responsibility of homeownership etc.

Another effective tool for assisting residents with homeownership and self-sufficiency is MDHA's Family Self-Sufficiency (FSS) Program. Through the FSS, portions of participants' rent received are earmarked for participants and placed in an escrow account to accumulate for later use. Participants sign an agreement to receive intensive goal-driven case management for a period of five years. Both Section 8 and Public Housing residents are eligible for MDHA's Family Self-Sufficiency (FSS) Program which combines MDHA and private resources to support residents in transitioning out of public assistance and attaining homeownership and financial independence. The type of services received enable families to increase their income, reduce or eliminate the need for government assistance, achieve higher education and job training, and progress in achieving economic independence and housing sufficiency. A total of 301 public housing residents are currently participating in the FSS Program. Four public housing participants purchased homes last year as of the last quarter of 2016. Since two thirds of the residents currently participating in the FSS Program were enrolled within the last twenty-four months, public housing FSS staff has set a goal of 2 first-time homebuyers during 2017. MDHA aims to increase the number of Family Self-Sufficiency Section 8 Voucher households to 150. MDHA's Rental Assistance Division has also set a goal to have 3 participants move to homeownership over the next calendar year. As of the third quarter of 2016, 3 participants had purchased homes.

Notices of public hearings for annual plans and reports are posted at properties, and residents are encouraged to attend. Public hearings on the Annual Update to the Consolidated Plan provide residents the opportunity to learn about affordable housing programs. During the development of the Agency's annual PHA plan, representatives from each MDHA department meet with Resident Association presidents to present a summary of each's department's core mission; again, this is an opportunity for residents to learn about affordable housing programs.

If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

MDHA is rated as a High Performer by HUD in the management of its public housing programs and a high performer under the Housing Choice Voucher Section 8 Management Assessment Program.

AP-65 Homeless and Other Special Needs Activities – 91.220(i)

Introduction

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness:

MDHA will support the following goals and actions for reducing and ending homelessness:

1. Utilizing HUD-provided technical assistance to collaborate with MHC and the community on assessing and improving the community's system for addressing homelessness.
2. Planning and program development, in conjunction with the Metropolitan Homelessness Commission and the Nashville/Davidson County Continuum of Care, to implement coordinated entry for veterans, chronic/vulnerable, families and youth/young adults. A Coordinated Entry System (CES) Manager is now in place at the Metro Homelessness Commission; the CES Manager has produced a working draft of a CES Policies & Procedures Manual and formed a CoC CES Subcommittee.
3. Providing homelessness prevention and diversion services to those who are still housed. To be maximally effective, shelter prevention and diversion will target households who are imminently going to experience homelessness within a few days. Ideally, this assistance will be tied to coordinated entry systems. For 2017, MDHA will consider prioritizing ESG prevention funds to assist persons with histories of homelessness, thereby increasing housing retention among the community of formerly homeless people in Nashville.
4. Investing in high-performing rapid rehousing. In spite of the tight local rental market, rapid rehousing programs are achieving positive results in exiting people to permanent housing. This suggests that the local system could house more people with an expansion of rapid rehousing and a shift of resources from emergency shelter. 2016 subrecipients are being asked to collect housing retention data from 90 days to as long as 6 months, to better determine the long-term effectiveness of this intervention.
5. Increasing system capacity in outreach and housing navigation services. The high cost of housing in Nashville has made it increasingly difficult to locate appropriate units for rapid rehousing and other subsidy programs. MDHA will consider

prioritizing outreach funds over emergency shelter funds (subject to the applicable cap), so that more system resources are dedicated to helping unsheltered people with searching for and securing housing through landlord cultivation and creation of housing/service plans. Local system capacity could be improved by utilizing ESG Rapid Re-housing funds to pay for housing search and placement services, and MDHA will encourage such proposals in its 2017 RFA process.

6. Investing more in HMIS. A key obstacle to local system planning and improvement in Nashville is a low rate of emergency shelter and transitional bed coverage in HMIS. With large key programs not contributing data, it is very difficult to have a complete system-level understanding of where people are entering the homelessness system, what programs are accessed, and the results of the interventions. MDHA will seek out additional funding for HMIS to support the expansion of the database to cover more local shelter beds and persons served; increase its focus on using this data to measure system performance; and support efforts to integrate the management of ESG funds with the Continuum of Care.
7. Providing funds (subject to applicable cap) to support shelter operations.
8. Supporting local efforts to increase permanent housing opportunities, linked to appropriate supports, for homeless veterans, chronic/vulnerable homeless persons, families and youth.
9. Addressing barriers to housing entry, such as, but not limited to, up-front housing costs like rent/utility deposits and first-month's rent, using available resources.

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

MDHA's Emergency Solutions Grants Review Committee will continue to invest in street outreach activities during the next funding cycle. In past years, Park Center has been awarded program funds for street outreach funds.

State ESG funds, administered by THDA have expanded outreach by the Metro Homelessness Commission to launch the new Nashville Outreach Team for Encampments (N.O.T.E.). The mobile team of two staff will soon be expanded to three, using CDBG funds committed by MDHA: the outreach specialists will engage people experiencing homelessness in unauthorized encampments to increase their access to housing and services.

Assessment of needs among the chronic and/or veteran homeless subpopulations will be conducted using the screening tool known as VI- SPDAT. Prioritization scores from this tool establish an admissions preference for housing.

A significant percentage of individuals experiencing homelessness are also impacted by mental illness. For 2017, Park Center will continue its homeless outreach program, partly funded by the Metropolitan Homelessness Commission. The program consists of two components: the SOAR initiative to link people to SSI/SSDI benefits; and Street

Outreach. Coordinators for each program work together to help connect homeless persons with vital community resources and services in an effort to ease their return to independent living.

The Mental Health Cooperative (MHC) operates the PATH program for persons with serious mental illnesses who are homeless or at risk of becoming homeless. The organization utilizes a team of outreach workers, case managers and providers, and makes services available offsite via a mobile clinic and offices at the Nashville Rescue Mission and other area shelters.

Addressing the emergency shelter and transitional housing needs of homeless persons

Nashville has an extensive network of emergency and transitional shelter options for homeless individuals and families. A supply of 1,596 year-round emergency beds and 614 transitional beds is enhanced each October by more than 200 seasonal beds added by the Room in the Inn program, which relies on local faith communities to open their doors and offer shelter during the winter months. Large shelters at times accommodate guests on overflow cots; in addition, the city has worked with private nonprofits to put in place a *Cold Weather Community Response Plan*, utilizing emergency warming shelters during extreme weather. In addition to the Nashville Rescue Mission and the Room in the Inn, efforts by advocates at Open Table Nashville assist with outreach and canvassing to let homeless persons sleeping outdoors know about available shelter options. Oasis Center and Launch Pad offer shelter to youth, and during times of extreme cold, the Nashville Humane Society provides a mobile haven for pets of homeless persons as well.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

MDHA has worked hand-in-hand with the Metropolitan Homelessness Commission to ensure that homeless individuals and families with the most severe needs are prioritized in Permanent Supportive Housing - a difficult but necessary step to ending homelessness among the most vulnerable, and towards meeting the Obama Administration's goal of ending chronic homelessness.

Among the top barriers to affordable housing cited in the Action Plan consultation session on homelessness were lack of affordable housing stock, and landlords who do not accept people with Section 8 vouchers and/or eviction histories. MDHA may explore possible technical assistance from HUD to better understand the new HEARTH Act regulations as they apply to rental assistance programs funded under CoC, and what steps could be

taken to more quickly lease units to homeless people in need. The CoC program, under Rental Assistance, allows payments to landlords to exceed the Fair Market Rent (FMR) as long as those payments are within the rent reasonableness standard. MDHA will work with agencies granted CoC assistance under this activity to explore existing sources of rental housing data that could be used to establish comparable rents that exceed FMR and potentially attract a broader spectrum of landlords. This could also serve as a springboard to strengthen coordination between services providers and housing providers, noted as having improved, but still weak in the consultation sessions. MDHA will encourage housing search and placement efforts for homeless persons, and hopes to convene a CoC General Meeting session sharing key strategies used by agencies that are successfully moving persons experiencing homelessness quickly into appropriate housing supports.

To help ease the transition of homeless people into affordable, permanent housing, MDHA identified Rapid Re-Housing as a priority for the FY 2016 ESG funding cycle. Obtaining permanent housing quickly for individuals and families who are already homeless will shorten the length of time spent in emergency and transitional shelters - justifying a focus on rapid re-housing. A triage tool like the VI-SPDAT will help quickly assess for extreme vulnerabilities and match people with the most appropriate support and housing interventions available. As the local market for affordable rental housing is extremely tight, MDHA forecasts using Rapid Re-housing funds in 2016 & 2017 via collaborative efforts that will serve homeless participants across agency lines, with critical housing search and placement activities.

This focus on investment in re-housing people who live on the streets, or in shelters, is a thread that runs consistently through the related federal notices.

Each year, MDHA estimates that over 9,000 people sleep in city shelters, transitional housing or outdoors, in need of safe, affordable, and permanent housing. Annual point-in-time numbers for the city since 2010 hover just above 2,200. These figures provide ample justification for re-housing as a top priority.

Using ESG funds to rapidly re-house homeless persons sleeping in shelters and outdoors in Metro Nashville will reduce the number of homeless people in the city across all subpopulations, including chronically homeless persons, veterans, families with children and homeless/runaway youth. MDHA encourages collaboration with local nonprofits to transition as many people as possible into permanent housing.

In November 2014, Nashville's Homeless Veteran Service Coordination Team was formed to coordinate efforts to prevent and end homelessness among Veterans in the CoC. This group will continue to review data on veteran households experiencing homelessness each month, number of Veteran households exiting homelessness each month by type of assistance provided (TH, PSH, RRH, etc.), length of stay in GPD and other transitional housing, data quality and reporting within HMIS, landlord outreach, permanent housing retention data, and SSVF integration into the ongoing development of the local coordinated entry system. The main objective is to have adequate permanent

housing opportunities available for Veterans who are experiencing homelessness at any given time. Metro Nashville is participating in the national Mayor's Challenge to End Veteran Homelessness and Zero:2016.

MDHA will continue to commit staff time and expertise to a housing campaign called How's Nashville, the local version of the national 100,000 Homes Campaign that is a community-wide, collaborative, and inclusive effort to end chronic and veterans homelessness in Nashville. How's Nashville partners work to connect the most vulnerable to permanent solutions and housing supports through a Housing First approach. How's Nashville partners set shared housing placement goals to end veterans and chronic homelessness and track the community's progress through frequent reporting of monthly housing placement and retention data. To bolster the supply of affordable housing offerings, MDHA has committed a monthly set-aside of 18 Housing Choice Vouchers each month, dedicated to chronic and highly vulnerable homeless persons with the longest histories of homelessness, who are identified via the VI-SPDAT screening tool and added to a prioritized waiting list maintained by Nashville's coordinated assessment system. MDHA will work with frontline nonprofit staff to streamline the application process for Section 8 and help decrease barriers to this resource.

The 2017 Action Plan includes additional Community Development Block Grant (CDBG) funds to continue the program started in 2013 to help pay for first month's rent, security deposits, and utility deposits for individuals and families experiencing chronic homelessness who are identified/prioritized by the common screening tool described above coming through the How's Nashville Campaign, Shelter Plus Care and VASH.

Primary local forces in preventing homelessness in Nashville include the Metro Social Services department, Metro Action Commission, NeedLink, Rooftop, and Ladies of Charity. These agencies work tirelessly to offer services and limited financial assistance on rent and utility arrears to keep households from becoming homeless.

MDHA intends to use ESG Prevention funds to enhance the efforts above. Funds were awarded to Safe Haven Family Shelter and Catholic Charities in 2016. Precious resources are being utilized to permanently house homeless people in Nashville, including rental subsidies such as VASH, CoC Shelter Plus Care and Housing Choice Vouchers. In tandem with these vehicles, ESG funds can help formerly homeless individuals remain housed and increase stability.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.

The United Way of Metro Nashville will continue to partner with Catholic Charities & Safe Haven Family Shelter in an effort to serve homeless/at-risk families with children in the city's school system, using funds from the Siemer Institute for Family Stability, a funder whose mission is reducing student mobility for school-aged children and preventing homelessness for families. To date, this program has served 292 families.

State ESG funds are administered by THDA. 2016 ESG funds to agencies in Nashville provide street outreach, emergency shelter, prevention and rapid rehousing services and enhance HMIS reporting capabilities. In the September 2016 consultation session that focused on needs of people with HIV/AIDS, participants urged support for short-term housing assistance (STRMU). This STRMU emphasis should be evident in HOPWA allocations for 2017, addressing a barrier to affordable housing that was also identified as critical in the session.

MDHA has adopted the following discharge policies for specific sub-populations to decrease the risk of persons exiting institutions will not enter into homelessness:

- **Foster Care Discharge Protocol: Formal Protocol**

Formal protocols are established and implemented through the Tennessee Department of Children's Services (DCS), which provides Chafee Foster Care Independent Living Program (CFCILP) services through its Independent Living Program (ILP), and also monitors the provision of Extension of Foster Care (ESC) Services. As a part of the federal mandate, this Division is charged with building a network of appropriate supports and services. DCS utilizes a "Predictors of Homelessness" assessment to help identify youth at age 17 who might be high risk for homelessness to ensure thoughtful planning and prevention.

The Department continues to believe that the best strategy for ensuring that older youth in foster care develop the independent living skills and have the ongoing supports and opportunities they need for a successful transition to adulthood is for them to achieve permanency and be part of a well-functioning family. For this reason, the Department continues its emphasis on finding permanency for older youth. The Department also recognizes that it is unrealistic to expect young people transitioning from foster care at age 18 to function fully independently without access to ongoing supports.

TN DCS IL has been partnering with the WIOA Youth Program through Tennessee Division of Labor and Workforce development. TN DCS and WIOA have met to discuss new federal regulations and how to better connect young people to employment opportunities. IL staff are participating in WIA youth councils across the state. This work will be ongoing.

The 4 Jim Casey resource centers across the state have programs that assist youth participating in their programs find employment and connection to the community. TN ILPS has secured contracts to 2017 for the four (4) resource centers.

Through a partnership with Youth Villages, any young person transitioning from foster care, irrespective of whether he or she opts into EFC, can receive case management services and supports through the Transitional Living Program, which helps foster youth and former foster youth ages 17-22 find safe housing, achieve stable employment, continue their education or get job training, reunite with birth families if possible, build healthy adult support systems and learn to manage their physical and mental health. YVLifeSet has three grand regional employment staff that help build relationships with business and connect youth to these opportunities.

The Department's Independent Living is focused on getting 90%+ of youth discharged from foster care because they reached the age of 18 at least one of the following apply at the time of discharge: earned a GED, graduated from high school, enrolled in high school or college or alternative approved educational program for special needs children, currently enrolled in vocational training, or employed full time.

Young people aging out of foster care are eligible for TennCare up to age 26.

As the Department believes 18 is too young for someone to be on their own, it developed a program called Extension of Foster Care within the Independent Living division. Young adults ages 18 up to 21 may enroll in Extension of Foster Care Services, which gives youth the ability to prepare for their futures by receiving additional educational opportunities, employment opportunities, and consistent and safe housing. DCS staff provide education and training vouchers to help pay for post-secondary education, whether college or technical school. They also provide placement support or a living allowance, access to life skills classes and leadership opportunities. The services are optional, but DCS wants to assist in the transition in order for youth and young adults in the state to become more confident, productive individuals in society and achieve lifelong success.

This additional time is designed to help youth:

- Prepare for your future through additional educational and employment training opportunities;
 - Find and secure consistent and safe housing; and
 - Build permanent connections with caring adults, including relatives, mentors and community members.
- **Health Care Discharge Protocol: Initial Discussion**

When seeking to successfully discharge homeless individuals, local hospitals and emergency rooms face inherent system challenges including a lack of centralized coordination and disposition planning across all levels of care; a paucity of shared information amongst a variety of service providers across housing, health, and social service sectors; and a shortage of stable housing and placement infrastructure.

The Hospital-to-Home (H2H) project, originating out of the Ideas to Reality program through the former Mayor's Office of Innovation, is positioned to improve the health outcomes and well-being of homeless individuals identified as high utilizers of local hospitals, by creating a coordinated, multi-sectoral collaborative response that breaks the cycle of homelessness and connects residents to health care and social supports in the community.

The H2H project focuses on a population that is known to accumulate uncompensated health care costs, have increased readmission rates, and poor health outcomes. The originating H2H team has drawn on best practices from other cities, academic research, and an extensive examination of Nashville's local processes to determine the best approach to the challenge presented by homeless people who are discharged by hospitals but who have no home, are frequently uninsured, and cannot manage their medical issues (and often co-occurring medical and behavioral health needs) on the streets or in emergency shelters.

Key events from 2016 and 2017 objectives for the Hospital to Home project:

1. The H2H Steering Committee was established and began meeting monthly then quarterly. Members initially include representatives from four (4) local hospitals/hospital systems; three (3) Federally Qualified Health Centers (FQHC's); and members of the Metropolitan Homelessness Commission (MHC);
2. MHC, as the backbone organization for H2H, convened a meeting with the Davidson County Sheriff's Office and the Nashville Rescue Mission to create and implement a data-sharing agreement. As a result, a cross-system data match was done between high users of jail beds and emergency shelter beds. The intent is to export said data match with local hospitals participating in the project in efforts to understand where to best allocate homeless assistance and housing resources;
3. Eighteen (18) group home beds were dedicated to H2H. Some hospitals are exploring opportunities to utilize said beds as "bridge housing" for H2H high utilizers;
4. In conjunction with the Coordinated Entry System, current efforts are underway to improve the process for referrals to and linkages to support services for those individuals and families moving from literal homelessness to housing. It is envisioned that identification of support service needs will occur in sync with bi-monthly care coordination (housing placement) meetings for Veterans, chronic single individuals and families. High utilizers may cut across all subpopulations of a coordinated entry system.

- **Mental Health Discharge Protocol: Formal Protocol Implemented**

Formal protocols are implemented through the Tennessee Department of Mental Health and Developmental Disabilities. Within 48 hours of patient admission to the area's mental health institute (MTMHI), social workers formulate discharge plans. Formal protocols are implemented through the TN Department of Mental Health & Substance Abuse Services, partnering with Centerstone to promote moves into community settings when patients are clinically ready. Indigent/Targeted funds provide temporary help with rent/utility deposits, transportation, & medication copays until income & benefits can be restored. A SOAR (Supplemental Security Insurance/Social Security Disability Insurance (SSI/SSDI) Outreach, Access and Recovery) liaison to MTMHI enhances the connection to SSI/SSDI & TennCare benefits. Although Tennessee has yet to expand Medicaid, maximizing access to Medicaid through SOAR is an example of Nashville doing a great deal more with less. This local effort, spearheaded by Park Center and funded through Nashville's Homelessness Commission, boasts an approval rate of 98% and a 38-day turnaround time for a disability determination.

Upon discharge, persons return to the home of family members, an apartment, recovery houses or an appropriate group home setting. Supplemented by the state, PATH (Projects for Assistance in Transition from Homelessness) assistance to the Mental Health Co-op provides outreach, referral, and linkage to housing and mainstream mental health/substance abuse services. Post-Discharge Follow-up Reports to MTMHI staff increase the likelihood that community housing options succeed.

In 2016 the Tennessee Department of Mental Health and Substance Abuse Services began implementing the Tennessee Cooperative Agreement to Benefit Homeless Individuals-State (TN-CABHI). This three-year initiative will provide collaboration among state-level agencies to reduce homelessness, and housing with support services to homeless veterans and other chronically homeless people living with mental illness and/or substance use disorders in Nashville- Davidson County, via financial support to the Metropolitan Homelessness Commission. The CABHI grant will help bridge local gaps by addressing barriers to access and availability of treatment as well as other support services - a critical link, in cases where participants choose to avoid certain providers or services, or are determined to be ineligible for a needed service.

- **Corrections Discharge Protocol: Initial Discussion**

The State Department of Corrections is in the process of revising the Tennessee Reentry Collaborative, a statewide group that hosts videoconferences quarterly to discuss solutions for preventing homelessness for individuals leaving the prison system. The group includes stakeholders such as the State Board of Probation and Parole, the Tennessee Housing and Development Agency, The Next Door, the Rehabilitative Services division of the Tennessee Department of Corrections, the

Alcohol & Drug Council, TriCor and the Veterans Administration. Policies have not been drafted or implemented to date. Within Metro Nashville's jail system, a Discharge Planner works to coordinate discharge, and lists of people due to be discharged are regularly sent electronically to case managers to coordinate and avoid discharge to the streets.

Within Metro Nashville's jail system, a Discharge Planner works to coordinate discharge; lists of people due to be discharged are regularly sent electronically to case managers to coordinate and avoid discharge to the streets. Many individuals coming out of jail, especially those who are not required to reside in a particular type of housing, want either their own housing or a private room in a place that is safe, drug/alcohol-free, affordable, clean and located outside of high-crime areas but still near public transportation.

The Davidson County Sheriff's Office operates the Transition from Jail to Community (TJC) Reentry Project in tandem with nearly 40 nonprofits. Reentry programming, which is offered to individuals regardless of length of stay or legal status, focuses on life skills, earning employment credentials, anger management/self-regulation, and other individual needs. The program is offered within 150 days of release. Reentry counselors work with incarcerated individuals to create a post-custody transition plan, including helping build connections to community supports. As part of the transition process, a variety of community-based organizations work in the jails/prisons to establish relationships with incarcerated individuals. This helps ensure, as individuals reenter the community, they are connected with a support system and needed services for completing a successful transition.

AP-70 HOPWA Goals – 91.220 (I)(3)

One year goals for the number of households to be provided housing through the use of HOPWA for:	
Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family	334
Tenant-based rental assistance	0
Units provided in housing facilities (transitional or permanent) that are being developed, leased, or operated	42
Units provided in transitional short-term housing facilities developed, leased, or operated with HOPWA funds	0
Total	372

AP-75 Barriers to affordable housing – 91.220(j)

Introduction

MDHA hosted a consultation on October 28, 2016 to discuss the affordable housing and fair housing needs/priorities for the 2017 Action Plan. As part of this discussion, participants were asked to identify barriers to affordable housing. These are listed below:

1. Cost of land.
2. Construction costs.
3. Costs of capital.

The attendees prioritized activities to address affordable housing as follows:

1. Rental housing for large families at or below 60% AMI.
2. Rental rehabilitation assistance.
3. New construction of rental housing for populations at or below 60% AMI.

The Analysis of Impediments to Fair Housing Choice (AI) listed “lack of affordable rental housing” and “lack of housing for persons with disabilities” as the top two impediments, respectively. These same impediments were echoed in the 2016 affordable housing consultation. Actions and activities to address these barriers and priorities are reflected in the AP-20 annual goals and objectives. Detailed information on all of the impediments listed in the AI and strategies for addressing them is contained in the Fair Housing Narrative. (See Appendix C.)

These needs and proposed activities are also reflected in the NashvilleNext Plan and have been voiced repeatedly in numerous conversations throughout the community.

Actions planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

During the NashvilleNext planning process, the Metro Planning Department thoroughly examined the impact of public policies, zoning and land use controls, and other barriers to affordable housing. The plan as adopted is available at <http://www.nashville.gov/Government/NashvilleNext.aspx>.

As a result of the NashvilleNext Plan, the Metro Council charged the Planning Department with taking the lead in the preparation of new regulations and tools aimed at ensuring that housing is attainable to every Nashvillian, at every income level. The Planning Department continuously reviews all regulatory requirements in the context of whether they impede the development of affordable housing and recommends changes be made when appropriate. Additionally, after review of the Housing Policy and Inclusionary Zoning Feasibility Study Report completed by Economic Development and Planning Systems, Inc., in March 2016, Metro Council adopted Inclusionary Housing Legislation in September, 2016 which provides incentives to developers that voluntarily agree include affordable housing in their proposed developments. A copy of this ordinance can be found at the following link:

http://www.nashville.gov/mc/ordinances/term_2015_2019/bl2016_133.htm

The Housing Policy and Inclusionary Zoning Feasibility Study report can be reviewed at the following link:

<http://www.nashville.gov/Portals/0/SiteContent/Planning/docs/InclusionaryHousing/Draft%20Report%20-%20Mar%2018%202016.pdf>

MDHA staff, including the Director of Community Development, participated in the Inclusionary Housing Stakeholders Group which provided input for the study that resulted in the passage of the legislation.

Because affordable housing is a countywide need, Metro and MDHA support Low- Income Housing Tax Credit and other subsidized housing projects. In addition, Metro, THDA, and MDHA supported state legislation to address property tax issues encountered by LIHTC developers, which make many affordable housing projects unfeasible. Further, through the support of Metro and MDHA, state legislation was passed in 2015 to allow MDHA to establish a Payment In-Lieu of Taxes (PILOT) program. MDHA began accepting applications for the PILOT in the fall of 2015, and, as of April 1, 2017, has approved PILOTS for three (3) developments to provide an estimated tax abatement of approximately \$921,445 annually for ten years to enable the development of 723 units of affordable housing.

During the 2017 Program Year, MDHA will undertake an Assessment of Fair Housing in accordance with the new Fair Housing Rule. The purpose of this Assessment is to analyze

challenges to fair housing and establish goals and priorities to address barriers. MDHA will perform the assessment on behalf of the entitlement programs and the public housing agency. The assessment will be submitted to HUD in September 2017 and will be used to guide the creation of the next Five Year Consolidated Plan.

AP-85 Other Actions – 91.220(k)

Actions planned to address obstacles to meeting underserved needs

The primary focus of the CPD grants is to address affordable housing needs. Through the placed-based strategy for community development, CDBG funds are targeted in areas with high concentrations of poverty – where investment is needed most. MDHA is continually seeking opportunities to provide additional services to public housing residents.

In 2013, MDHA allocated CDBG funds to help homeless Veterans through Metro Homelessness Commission's How's Nashville campaign with security deposits, utility service deposits and first month's rent assistance for an amount up to \$1,000 per client. This program was expanded in 2014 to provide this assistance to persons in Shelter Plus Care, VASH and other local homeless programs and continued in the 2015 thru 2017 Program Years. In 2016 additional funds were allocated to support outreach as part of Metro's encampment response plan.

In response to the shortage of affordable housing, in February 2017, Metro Nashville provided funds for an incentive program to encourage owner/landlords of property located in Davidson County to rent their units to homeless Veterans who are determined eligible for rental assistance under the MDHA VASH program. There are two components to the program: a lease signing bonus and eligibility of unpaid rent or damages after VASH participant moves from the unit.

Actions planned to foster and maintain affordable housing

As discussed throughout this Plan, the need for affordable housing, particularly for the extremely low-income is acute. Programs and funding opportunities offered through CDBG and HOME are designed to create and/or preserve affordable housing. However, these resources fall far short of the need. MDHA actively pursues Low-Income Housing Tax Credit (LIHTC) funding opportunities and has successfully developed two LIHTC properties in the past three years. In addition, since 2010, MDHA has competitively awarded a total of \$5.4 million in HOME funds to five developers utilizing LIHTC that will result in the creation of 394 units affordable to households with incomes at or below 60% AMI.

MDHA is also pursuing opportunities to increase the number of public housing units, which will increase the housing stock for the extremely low-income and continues to work with local financial institutions to create additional financing mechanisms through the Community Reinvestment Act partnership. MDHA submitted LIHTC applications in 2016

for funding to construct 80 new units of affordable housing and to renovate 125 units in the Parkway Terrace Public Housing Development.

In 2013, Metro Nashville established the Barnes Fund for Affordable Housing in an effort to create a recurring funding source for affordable housing development. During the initial funding round, MDHA leveraged \$1.2 million in HOME funds with \$2 million from the Barnes Fund for projects that will create 44 affordable housing units. During the 2015 funding round, MDHA leveraged \$1.5 million in HOME funds with \$500,000 from the Barnes to be used to create 60 additional units of affordable housing.

The Nashville-Davidson Metro Housing Policy and Inclusionary Zoning Feasibility Study completed by Economic & Planning Systems, Inc. in March 2016 recommended a dedicated revenue source of approximately \$10 million a year was needed to begin to address the affordable housing crisis. In response, Mayor Barry in April 2016 released her housing priorities and action plan for 2016-2017 that focused on city resources and attention on the need to fund, build, preserve and maintain affordable and workforce housing in Davidson County. One of the highlights of the plan included a \$10 million investment in her first annual budget in the Barnes Fund for Affordable Housing and a commitment for this amount to be included in future budgets during her administration. This investment in the Barnes Fund is the largest since the Fund was created in 2013 and will be in addition to \$5 million to be received from the sale of the Nashville Convention Center that was committed to the fund during the prior administration. This local investment will help fill Nashville's widening affordable housing gap and will help supplement funding for the HOME program that has been continually shrinking (i.e., cut by 53% since 2005).

The Barnes Trust Fund Commission and other partners continue to research additional ways to capitalize the Trust Fund in order to have a recurring source of funds to use for affordable housing that is non-dependent on public dollars in case of leaner budget times and/or a change in the priorities of local government.

Actions planned to reduce lead-based paint hazards

Addressing lead-based hazards are eligible costs in all CDBG and HOME-funded rehabilitation projects.

MDHA implements its housing related activities in accordance with all applicable HUD, EPA, and State of Tennessee regulations. When providing assistance under its housing programs, MDHA will provide all clients and potential clients with the "Lead- Based Paint" pamphlet that describes hazards of lead-based paint. Pursuant to 24 CFR Part 35, all rental and homeowner dwelling units that wish to receive federal assistance and were built prior to 1978 are tested for lead-based paint. These tests consist of visual inspections, lead screens, and full assessments. In addition, addressing lead- based paint hazards is an eligible activity in the home rehab programs and rehab of shelters and community centers.

MDHA has supported the Tennessee Department of Environment and Conservation (TDEC) on its application for a HUD Lead-Based Paint Hazard Control Grant. In past years, MDHA supported Rebuilding Together Nashville when it operated a Lead Hazard Reduction Program by providing outreach to residents.

Actions planned to reduce the number of poverty-level families

Part of MDHA's ongoing anti-poverty effort is to provide job training, employment, and contract opportunities for government housing residents and low- or very-low income residents in compliance with the regulatory requirements of HUD's Section 3 program. Section 3 aims to help residents obtain the skills and employment needed to become self-sufficient and to provide opportunities for qualified, low-income business owners to receive preference in bidding on HUD-funded contracts in their neighborhoods. MDHA's partnership with Pathway Lending is designed to increase the number of Section 3 opportunities.

In furtherance of MDHA's commitment to provide employment training and opportunities, MDHA's Affordable Housing division created a Groundskeeper position. This is an entry level position with MDHA that will be targeted towards current residents of MDHA properties. The positions will be full-time, and are eligible for all benefits currently offered to current MDHA employees. The first resident Groundskeepers were hired in October 2016. If there is an insufficient resident pool of applicants, the position will be made available to other Section 3 eligible applicants. Employees that start as Groundskeepers will have an opportunity to work with MDHA maintenance staff. After successfully gaining skills necessary for promotion, it is our plan that this position will serve as a source of eligible applicants for MDHA's Maintenance Technician positions.

In addition, MDHA's Rental Assistance Department will continue to offer a Family Self Sufficiency Program, which funds strategies to help families obtain decent employment that will lead to economic independence and self-sufficiency. The types of services offered include life skills training, case management to assist persons in getting enrolled in GED and other educational programs, job training and placement, and homeownership counseling. These services enable participants to increase income, reduce or eliminate the need for public assistance, achieve economic independence and homeownership. Several CDBG-funded programs place an emphasis on providing opportunities to public housing residents.

One of Mayor Barry's first actions was to create the Office of Economic Opportunity and Empowerment (OEOE). The Office seeks to ensure that Nashville's growth results in an increased quality of life for all Nashvillians through innovation and collaboration across Nashville's economic opportunity efforts. OEOE routinely engages community partners, efficiently leverages resources, and facilitates long-term planning and coordination to reduce poverty in Nashville.

With an emphasis on social and economic equity, OEOE currently focuses on the following economic opportunity priority areas:

- Affordable Housing: Increase access to safe and affordable housing
- Financial Empowerment: Increase access to financial stability through the Financial Empowerment Center and other financial empowerment tools
- Homelessness: Work closely with the Metropolitan Homelessness Commission and service providers to end homelessness in Nashville
- Workforce Development: Increase access to quality jobs and wages.

MDHA staff work closely with the OEOE team.

In support of Mayor Barry’s efforts to increase opportunities for Nashville youth, MDHA recreated the Summer Youth Employment Program. For six weeks during the summer of 2016, MDHA hired 12 public housing residents enrolled in Davidson County High Schools for the previous academic year. The students were selected based on their expressed interest, attitude, and recommendation of the staff that work at the sites where the students live. The goal of the summer program was to introduce students to: workplace culture, workplace speech, workplace dress, punctuality requirements, and to expose them to careers they may not ordinarily encounter. In addition to introduction to MDHA careers, students took trips to: Frist Visual Arts Center, Meharry Medical College, established banking relationships with U.S. Community Credit Union, and completed various team building activities. This program will be replicated in 2017 in partnership with the Opportunity NOW program.

Based on recommendations from a Youth Violence Summit held in 2016, Mayor Barry has launched “Opportunity NOW” which is a coordinated initiative between the Mayor’s Office, the Nashville Career Advancement Center (NACA), and the City’s agency for workforce development to provide opportunity and hope to youth between the ages of 14 and 24 by providing access to paid employment opportunities. The program is broad enough to cater to a variety of skill levels. The goal of the program is to employ 10,000 youth during the summer of 2017.

Additionally, MDHA’s grant writer continuously pursues funding opportunities that will aide in the reduction of poverty-level families, particularly those that reside in public housing.

Actions planned to develop institutional structure

As during previous planning periods, MDHA will continue to work with various agencies within Metro Nashville to ensure that services offered through entitlement grant programs receive maximum amounts of exposure and benefit. Several of these programs will be carried out through oversight by MDHA and work conducted through the issuance of subrecipient agreements and/or developer agreements. The table provided in Appendix D illustrates the delivery system.

The Metro Nashville community has a number of qualified and experienced nonprofits that assist MDHA in the implementation of the Consolidated Plan. Many of the existing programs that are administered by MDHA have been redesigned for efficiency in the last several years as funding priorities have shifted. During this time, MDHA has

continued to expand efforts to increase the number of opportunities for participation from outside organizations.

There are continuing needs to develop and encourage the participation of residential groups in the community development process. There are ongoing efforts to strengthen the capacity of Community Housing Development Organizations (CHDOs) to carry out housing development activities funded through MDHA.

Additionally, MDHA will partner with the Mayor's Office of Economic Opportunity and Empowerment to utilize CDBG funds that are allocated for non-profit capacity building to structure a training/mentoring program with an emphasis on affordable housing development and preservation.

To strengthen the City's efforts to address and end homelessness, Metropolitan Homelessness Commission (MHC), MDHA, and the Frist Foundation engaged Focus Strategies in 2015 to assess the current homeless system and make recommendations for improving our efforts. The final report was released in the spring of 2016. Its recommendations for developing a housing crisis resolution system and streamlining governance and planning are being considered. To assist in this effort, the HUD Field Office requested technical assistance (TA) to support the Continuum of Care (CoC) in developing a strong and transparent governance structure to help the city prevent and end homelessness. As a result, the Cloudburst Group, a national HUD Technical Assistance consultancy, was assigned to the Nashville CoC to facilitate a community driven process to simplify the governance structure for its homelessness system. Cloudburst team members bring experience facilitating governance processes from all over the country. This TA began in November 2016 and is expected to last through the summer of 2017.

This technical assistance is focused on strengthening the local Continuum of Care's ability to coordinate housing, services, and funding streams by:

- Developing a plan for meeting goals for ending and preventing homelessness
- Focusing on SYSTEM performance rather than project performance
- Increasing collaboration with ESG recipients
- Establishing optimal CoC governance structures

The Cloudburst team will also be looking at HMIS data options during their engagement to assess the feasibility of including data from additional community agencies for analysis and planning to quantify the extent of the need.

Actions planned to enhance coordination between public and private housing and social service agencies

Coordination between housing providers and services providers was identified as a particularly weak link in the local system, during the September 2016 Action Plan consultation session on homelessness and housing for persons with AIDS.

A key recommendation was to more closely connect housing providers (public and private) with service providers, via a number of efforts:

- Developing a list of housing providers that serve low-income/homeless and their requirements
- Implement more effective communication among providers- using Information & Referral and/or Coordinated Entry System
- Provide incentives and support systems for landlords

Several participants suggested using the city's HMIS to accomplish the tasks above.

Staff at shelters and other frontline staff have been using a common assessment tool called the VI-SPDAT since February 2014 to identify and prioritize Veterans and non-Veterans for permanent housing. Staff that use the VI-SPDAT also complete a 2-hour "housing navigation" training that outlines processes to connect people experiencing homelessness to housing and support service resources. These efforts have led to more coordination, data sharing, and prioritization among providers.

MDHA Community Development and Rental Assistance staff are participating in the ZERO 2016 initiative to end Veterans homelessness. Staff is serving on the Leadership Committee to help coordinate the efforts of this initiative.

In 2017, MDHA staff will continue to meet with staff of the Nashville Rescue Mission to discuss how to most effectively integrate/aggregate client level data collected by the Mission and MDHA, to better gauge the extent of homelessness in the city, gain an understanding of duplications and how to reduce them. In this same vein, MDHA will also discuss an alternative to the current "closed" HMIS system. During the consultation session, a common thread in responses to several of the coordination questions was the need for an open management information system. Cloudburst will be looking at HMIS data options as part of the TA process.

The HOPWA program will continue to be coordinated with other community planning efforts that address housing and supportive service needs of individuals and families affected by HIV/AIDS. These include the Ryan White Community AIDS Partnership and HUD's Continuum of Care planning process. MDHA's Homeless Coordinator, who facilitates the city's Continuum of Care competition each year, was appointed by former Mayor Karl Dean to the 30-member Ryan White Part A Planning Council, staffed by the city's Public Health Department. Members of this planning effort include individuals who are affected and infected by HIV and/or AIDS. The Planning Council is responsible for prioritizing HIV/AIDS services based on community need, allocating Ryan White Part A funding for these services, conducting an annual Needs Assessment, establishing a standard of care based on best practices, developing and following a 3-year strategic plan, evaluating service effectiveness, assessing the administrative functions of the grant, and other activities which maintain and improve the system of care in the 13- county Transitional Grant Area (TGA).

Discussion

MDHA is responsible for ensuring that the federal funds it manages are in compliance with federal guidelines. MDHA's performance monitoring activities include onsite monitoring, desk reviews, and technical assistance for recipient agencies.

In an effort to ensure long-term compliance with program requirements and comprehensive planning requirements, all subrecipients, contractors, grantees, etc., enter into a contractual agreement with MDHA. These agreements include a detailed scope of services with measurable objectives. The general Federal provisions, along with reference to the appropriate 2 CFR Part 200 Uniform Administrative Requirements, Cost Principles, and Audit requirements for federal awards, are included in contractual agreements to ensure compliance. The budget line items must be reflective of the goals and objectives.

MDHA's Community Development Department staff conducts on-site monitoring of recipient agencies on an annual basis. MDHA staff will evaluate agencies' programmatic and fiscal management policies. MDHA staff utilize the HUD Monitoring Desk Guide to determine CDBG, HOME, HOPWA, and ESG compliance. Additionally, recipients are required to provide regular reports on their achievement of contractual objectives as a requirement for reimbursement.

MDHA's Community Development Department will continue to evaluate its monitoring plan to ensure grant programs are in accordance with local program policies and procedures and Federal regulations and to develop appropriate internal controls. Staff will conduct an annual risk assessment to identify high-risk agencies or programs and develop a quarterly monitoring schedule and is in the process of developing formal monitoring protocol.

In addition to staff monitoring, Community Development programs may be selected for review by the Agency's internal and external auditors.

Program Specific Requirements

AP-90 Program Specific Requirements – 91.220(l)(1.2.4)

Introduction

In accordance with Federal regulations, this Action Plan describes the CDBG, HOME, and ESG activities proposed to be undertaken during the 2017 Program Year. To the extent allowed by Federal regulations, MDHA may claim costs incurred prior to the effective date of respective grant agreements.

Community Development Block Grant Program (CDBG) Reference 24 CFR 91.220(l)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

- | | |
|---|---|
| 1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed | 0 |
| 2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan | 0 |
| 3. The amount of surplus funds from urban renewal settlements | 0 |
| 4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan. | 0 |
| 5. The amount of income from float-funded activities | 0 |

Total Program Income 0

Other CDBG Requirements

- | | |
|---|-----|
| 1. The amount of urgent need activities | 0 |
| 2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. | 95% |

Specify the years covered that include this Annual Action Plan. 2017

HOME Investment Partnership Program (HOME)
Reference 24 CFR 91.220(I)(2)

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

N/A

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

HOME Resale/Recapture provisions are detailed in Appendix A.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds. See 24 CFR 92.254(a)(4) are as follows:

HOME Resale/Recapture provisions are detailed in Appendix A.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

N/A

Discussion: On February 7, 2017, HUD issued 2017 homeownership value limits for the HOME program. Upon reviewing the new limits, MDHA became concerned that the HUD-provided limits were much lower than the current Nashville market. Review of local housing data substantiated these suspicions. As a result, MDHA is submitting documentation in Appendix B of this Action Plan seeking HUD approval for MDHA to use local value limits established in accordance with the requirements and methodology outlined at 24 CFR 92.254(a)(2)(iii). Based on the data provided using the prescribed methodology, 95% of the median purchase price limit will be \$265,291 for single family existing construction and \$341,999 for single family new construction. These are the value limits MDHA will utilize to ensure homes acquired with HOME funds comply with modest housing requirement of 24 CFR 92.254. All Homes must be sold to households with incomes at or below 80% AMI.

**Emergency Solutions Grant (ESG)
Reference 91.220(I)(4)**

1. Include written standards for providing ESG assistance (may include as attachment).

An ESG Policies & Procedures Manual was created by MDHA in June 2012. A draft of standards for the local ESG assistance was emailed to ESG sub-recipients for their input, and updated in December 2016. A final draft will be prepared in consultation with the CoC, once HUD publishes final regulations for the ESG program.

2. If the Continuum of Care has established centralized or coordinated assessment system (CES) that meets HUD requirements, describe that centralized or coordinated assessment system.

Since June 2013, the VI-SPDAT tool has served as a de facto coordinated assessment to prioritize homeless people for housing through the city's How's Nashville campaign. The Homelessness Commission has hired a CES Manager, who has revised a CES Policies and Procedures Manual, and is fine tuning the Families, Veterans and Individuals systems. In early 2017, we hope to begin utilizing the CES system to connect young people to housing and services.

3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations).

A Request for Applications is emailed to 108 individuals, representing over 40 community- and faith-based entities and/or governmental agencies. Application responses are reviewed and rated by a six-member review committee based on the following evaluation criteria: Project Quality; Need for Project; Operational Feasibility; Applicant Capacity, including HMIS data quality; and proven ability to stabilize homeless people with housing and income supports. The review committee is distinct from the local CoC decision-making body but typically includes a member of the CoC Performance Evaluation Committee furthering the coordination between the two funding streams. Awards are made based on the recommendation of the review committee.

4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.

MDHA ensures the voice of homeless or formerly homeless people in ESG policies and funding decisions in two ways. Each year, it recruits someone who has been, or who is currently, homeless to serve as a member of the ESG Review Committee. A clause requiring this type of input is also written by MDHA into all ESG Memoranda of Agreement with subrecipient agencies.

5. Describe performance standards for evaluating ESG.

At the December 2016 start-up conference, where draft statistics on performance for the prior year were distributed, MDHA and ESG funded agencies began a conversation on 2017-18 performance standards to evaluate the effective use of ESG funding. The targets below are based on this draft data as well as feedback during March 2017, and reach for improvements during program year 2017-18 on several measures. This is a work in progress, as the Continuum increases its focus on data collected via MDHA’s Homeless Management Information System (& comparable databases, in the case of domestic violence shelters).

Agencies using ESG funds will continue to strive to assure that housing stability & incomes are increasing via ESG funds, as well as how stays in shelter are becoming shorter, and recidivism is declining. These measures, and how well agencies are meeting them, will have increasing weight in scoring in the local ESG RFP process.

ESG PERFORMANCE TARGETS for PROGRAM YEAR 2017		
NASHVILLE, TENNESSEE		
Operating Costs		Target
	Exits to Permanent Housing	25%
	Increased Income	15%
	Employment	20%
	Increased Access to Mainstream Benefits	80%
	Length of Stay – 30 days Emergency - 180 days – Transitional*	
	Recidivism	10%
	Data Accuracy	95%

Rapid Re-housing		
	Maintained or Increased Income	85%
	Increased Access to Mainstream Benefits	92%
	Length of Stay	70 days
	Recidivism	5%
	Data Accuracy	95%
	Retention in Housing	85%
Street Outreach		
	% who exit streets to perm hsg	10%
	% who exit streets to temp destination	20%
	# actually served vs. projected	100%
Prevention		
	Maintained or Increased Income	90%
	Increased Access to Mainstream Benefits	75%
	Housing stability at exit	95%
	Recidivism	10%

*Transitional housing programs that received ESG funding in 2010 are grandfathered into eligibility for current funding.

METROPOLITAN NASHVILLE-DAVIDSON COUNTY, TENNESSEE

APPENDICES

**2017-2018 ANNUAL UPDATE
TO THE
2013-2018 CONSOLIDATED PLAN
FOR
HOUSING AND COMMUNITY DEVELOPMENT**

PROGRAM YEAR FIVE

For the period June 1, 2017 – May 31, 2018

Prepared by:

Metropolitan Development and Housing Agency
701 South Sixth Street
Nashville, Tennessee 37206



On Behalf of:

The Metropolitan Government of
Nashville and Davidson County

Updated June 2017



2017-2018 Annual Update to the 2013-2018 Consolidated Plan

(2017 Action Plan) Program Year Five

APPENDICES

Appendix A – HOME Resale/Recapture Provisions

Appendix B – Data to establish 95% of the Median Area Purchase Price for Single Family housing in Metropolitan Nashville-Davidson County

Appendix C - Fair Housing Narrative

Appendix D – Actions Planned to Develop Institutional Structure Delivery System

Appendix E - Summary of Consultations

Appendix F – Public Notices

Appendix G – Summary of Public Comments and MDHA Responses

Appendix H – SF 424 and Certifications

APPENDIX A

HOME RESALE/RECAPTURE PROVISIONS

I. BACKGROUND

Section 215 of the HOME statute establishes specific requirements that all HOME-assisted homebuyer housing must meet in order to qualify as affordable housing. Specifically, all HOME-assisted homebuyer housing must have an initial purchase price that does not exceed 95 percent of the median purchase price for the area, be the principal residence of an owner whose family qualifies as low-income at the time of purchase, and be subject to either resale or recapture provisions. The HOME statute states that resale provisions must limit subsequent purchase of the property to income-eligible families, provide the owner with a fair return on investment, including any improvements, and ensure that the housing will remain affordable to a reasonable range of low-income homebuyers. The HOME statute also specifies that recapture provisions must recapture the HOME investment from available net proceeds in order to assist other HOME-eligible families. The Participating Jurisdiction (PJ) utilizes the resale/recapture methods for HOME homebuyer programs in accordance with 24 CFR 92.254(a)(5).

The HOME rule at §92.254(a)(5) establishes the resale and recapture requirements HOME PJs must use for all homebuyer activities. These provisions are imposed for the duration of the period of affordability on all HOME-assisted homebuyer projects through a written agreement with the homebuyer, and enforced via lien, deed restrictions, or covenants running with the land. The resale or recapture provisions are triggered by any transfer of title, either voluntary or involuntary, during the established HOME period of affordability.

When undertaking HOME-assisted homebuyer activities, including projects funded with HOME program income, the PJ must establish resale or recapture provisions that comply with HOME statutory and regulatory requirements and set forth the provisions in its Consolidated Plan. HUD must determine that the provisions are appropriate. The written resale/recapture provisions that the PJ submits in its Annual Action Plan must clearly describe the terms of the resale/recapture provisions, the specific circumstances under which these provisions will be used, and how the PJ will enforce the provisions.

II. DEFINITIONS

- Development Subsidy – a development subsidy is defined as financial assistance provided by the PJ to offset the difference between the total cost of producing a housing unit and the fair market value of the unit. When provided independently and absent any additional subsidy that could be classified a direct subsidy, development subsidy triggers resale.

- **Direct Subsidy** – a direct subsidy is defined as financial assistance provided by the PJ that reduces the purchase price for a homebuyer below market or otherwise subsidizes the homebuyer [i.e. down-payment loan, purchase financing, assistance to CHDO to develop and sell unit below market, or closing cost assistance]. A direct subsidy triggers recapture.
- **Net Proceeds** – the sales price minus superior loan repayment (other than HOME funds) and any closing costs.

III. PERIOD OF AFFORDABILITY

The HOME rule at §92.254(a)(4) establishes the period of affordability for all homebuyer housing. How the PJ calculates the amount of HOME assistance in each unit and therefore the applicable period of affordability varies depending on whether the unit is under resale or recapture provisions.

a. Period of Affordability Under Resale Provisions

Under resale, §92.254(a)(5)(i) of the HOME rule states that the period of affordability is based on the total amount of HOME funds invested in the housing. In other words, the total HOME funds expended for the unit determines the applicable affordability period. Any HOME program income used to assist the project is included when determining the period of affordability under a resale provision.

b. Period of Affordability Under Recapture Provisions

For HOME-assisted homebuyer units under the recapture option, the period of affordability is based upon the HOME-funded Direct Subsidy provided to the homebuyer that enabled the homebuyer to purchase the unit. Any HOME program income used to provide direct assistance to the homebuyer is included when determining the period of affordability.

The following table outlines the required minimum affordability periods.

If the total HOME investment (resale) or Direct Subsidy (recapture) in the unit is:	The Period of Affordability is:
Under \$15,000	5 years
Between \$15,000 and \$40,000	10 years
Over \$40,000	15 years

IV. RESALE PROVISIONS

The PJ's Resale Provisions shall ensure that, when a HOME-assisted homebuyer sells his or her property, either voluntarily or involuntarily, during the affordability period,

1. The property is sold to another low-income homebuyer who will use the property as his or her principal residence;
2. The original homebuyer receives a fair return on investment, (i.e., the homebuyer's down-payment plus capital improvements made to the house); and
3. The property is sold at a price that is "affordable to a reasonable range of low-income buyers."

a. Applicability

When provided independently and absent any additional subsidy that could be classified a direct subsidy, development subsidy triggers Resale Provisions. The PJ shall apply the Resale Provisions to projects receiving development subsidies only, with no direct subsidy to the homebuyer. In the event the PJ provides a development subsidy (i.e. the difference between the total cost of producing the unit and the fair market value of the property) to CHDOs or subrecipients and a direct subsidy is subsequently provided to the homebuyer, only the direct subsidy shall be considered and the Recapture (not Resale) Provisions shall be applied.

b. Effect

The HOME rule at §92.254(a)(3) requires that all HOME-assisted homebuyer housing be acquired by an eligible low-income family, and the housing must be the principal residence of the family throughout the Period of Affordability. Under Resale Provisions, if the housing is transferred, voluntarily or otherwise, during the Period of Affordability, it must be made available for subsequent purchase only to a buyer whose household qualifies as low-income, and will use the property as its principal residence.

c. Fair Return on Investment

The PJ's Resale Provisions shall ensure that, if the property is sold during the period of affordability, the price at resale provides the original HOME-assisted homebuyer a fair return on investment (including the original homebuyer's initial investment and any capital improvement). The value of capital improvements is defined by the PJ as the actual, documented costs of permanent structural improvements or the restoration of some aspect of a property that either will enhance the property value or will increase the useful life of the property. Capital improvements are generally non-recurring expenses, such as the cost of an addition, a remodel, or a new roof. Repairs and regular maintenance are not capital improvements. To be considered by the PJ in determining fair return on investment, the actual costs of the capital improvements must be documented with receipts, cancelled checks, or other documents acceptable to the PJ.

The PJ shall consider a fair return on investment achieved when the original homebuyer (now the seller) receives from the sale a percentage return on investment based on the change in the Median Sale Price for the Metropolitan

Statistical Area, as published periodically by HUD with the FHA Mortgage Limits (also known as the “203(b) limits”).

$$\text{Fair Return} = (\text{initial investment} + \text{value of improvements}) \times \\ \text{Current Area Median Sales Price} / \text{Initial Area median sales price}$$

Where Median Sale Price is the current area median sale price at the time of resale and Median Sale Price is the initial area median sale price at the time of the homeowner’s original purchase transaction.

For example, in 2009 an eligible homebuyer purchases a house that has received a HOME development subsidy and is subject to Resale Provisions. The homebuyer provides \$5,000 for a down-payment and in 2011 spends \$10,000 to remodel and upgrade the kitchen. In 2012 the homeowner sells the home. In 2009 the median sale price for the area was \$250,000 and in 2012 the figure is \$268,000. In this example, the fair return on investment is \$16,080.

$$\text{Fair Return} = (\$5,000 + \$10,000) \times \\ \$268,000 / \$250,000$$

The fair return to the homeowner is paid out of proceeds from the sale of the home; if the home is sold at a loss and no proceeds are available, the homeowner shall not be entitled to any return. If proceeds are insufficient to provide the full amount of the calculated fair return, the homeowner shall receive a return only up to the amount of available proceeds.

d. Continued Affordability

In addition to ensuring that the HOME-assisted homebuyer receives a fair return on his or her investment, the PJ’s Resale Provisions shall ensure that the housing under a Resale Provision will remain affordable to a reasonable range of low-income homebuyers. Accordingly, the PJ shall ensure that the sales price of a home resold under Resale Provisions is within the maximum mortgage capacity of a target population of potential buyers with incomes ranging from 50% to 80% of the Area Median Income (AMI). More specifically, the PJ defines “affordable to a reasonable range of low-income homebuyers” as housing with a sales price not exceeding three times the low-income limit (80% AMI) for the Metropolitan Statistical Area corresponding to a household size equivalent to the number of bedrooms in the home.

For example, if the low-income limit or (80% AMI) for a household of three in the PJ’s jurisdiction is \$49,200, the maximum resale price for a three bedroom house subject to Resale Provisions in the PJ’s jurisdiction is \$147,600, or three times the low-income limit.

e. Imposing Resale Provisions

A clear, detailed written agreement, executed before or at the time of sale,

ensures that all parties are aware of the specific HOME requirements applicable to the unit (i.e., period or affordability, principal residency requirement, terms and conditions of either the resale or recapture requirement). The HOME written agreement must be a separate legal document from any loan instrument and must, at a minimum, comply with the requirements at §92.504(c)(5) of the HOME rule. If the PJ provides HOME funds to a subrecipient or CHDO to develop and sell affordable housing, the PJ must prepare and execute the agreement with the buyer, or be a party to the agreement along with the entity it funded.

While mortgage and lien documents are used to secure repayment of the HOME subsidy, these documents are not sufficient to enforce the Resale Provisions. Separately recorded deed restrictions, covenants running with the land, or other similar mechanisms must be used to impose the Resale Provisions (§92.254(a)(5)(i)(A)) in HOME-assisted homebuyer projects under the resale option. The purpose of these enforcement mechanisms is to secure and retain the affordable re-use of the property, while providing a fair return to the seller.

f. Foreclosure

In HOME-assisted homebuyer projects, the affordability restrictions imposed by deed restrictions, covenants running with the land, or other similar mechanisms may terminate upon foreclosure, transfer in lieu of foreclosure or assignment of an FHA insured mortgage to HUD. In such cases, the termination of the affordability restrictions does not satisfy the requirement that the property remains qualified as affordable housing under §92.254 for the period of affordability.

Consequently, for HOME-assisted homebuyer housing under a Resale Provision, if the affordability is not preserved by a subsequent purchase at a reasonable price by a low-income homebuyer who will use the property as its principal residence, and who agrees to assume the remainder of the original affordability period, the PJ shall repay the full amount of the HOME investment.

V. RECAPTURE PROVISIONS

Unlike the resale approach, the PJ's Recapture Provisions permit the original homebuyer to sell the property to any willing buyer during the period of affordability while the PJ is able to recapture all or a portion of the HOME-assistance provided to the original homebuyer.

a. Applicability

Recapture Provisions are the PJ's preferred mechanism for securing HOME Program investments and are generally applicable to all PJ homebuyer activities, unless circumstances otherwise require Resale Provisions be used. Specifically, Recapture Provisions are always used in cases involving a Direct Subsidy to a homebuyer. Recapture provisions cannot be used when a project receives only a

Development Subsidy and is sold at fair market value, because there is no direct HOME subsidy to recapture from the homebuyer. Instead, Resale Provisions must be used in this case.

b. Effect

If a homeowner chooses to sell or use the property for non-eligible HOME Program activities during the Period of Affordability, the full amount of the HOME Program Direct Subsidy (specifically excluding the amount of any Development Subsidy) shall be recaptured and repaid to the PJ provided that net proceeds are sufficient. MDHA may choose to forgive a portion of the HOME Program Direct Subsidy subject to recapture on a pro-rata basis over the affordability period. If net proceeds are insufficient to repay the total HOME investment due, only the actual net proceeds will be recaptured. In the event that net proceeds are zero (as is usually the case with foreclosure), the recapture provision still applies, but there are no funds to recapture. Recaptured funds shall be returned to the PJ HOME Trust Fund to be reinvested in other affordable housing for low to moderate income persons.

c. Imposing Recapture Provisions

A clear, detailed written agreement, executed before or at the time of sale, ensures that all parties are aware of the specific HOME requirements applicable to the unit (i.e., period or affordability, principal residency requirement, terms and conditions of either the resale or recapture requirement). The HOME written agreement must be a separate legal document from any loan instrument and must, at a minimum, comply with the requirements at §92.504(c)(5) of the HOME rule. If the PJ provides HOME funds to a subrecipient or CHDO to develop and sell affordable housing, the PJ must prepare and execute the agreement with the buyer, or be a party to the agreement along with the entity it funded.

The written agreement between the homebuyer and the PJ, as well as mortgage and lien documents are all used to impose the Recapture Provisions in HOME-assisted homebuyer projects under the recapture option. The purpose of these enforcement mechanisms is to ensure that the PJ recaptures the Direct Subsidy to the HOME-assisted homebuyer if the HOME-assisted property is transferred. Unlike the resale option, deed restrictions, covenants running with the land, or

other similar mechanisms are not required by the HOME rule to be used in homebuyer projects under the recapture option.

d. Foreclosure

In HOME-assisted homebuyer projects, the affordability restrictions imposed by deed restrictions, covenants running with the land, or other similar mechanisms may terminate upon foreclosure, transfer in lieu of foreclosure or assignment of an FHA insured mortgage to HUD. In such cases, the termination of the

affordability restrictions does not satisfy the requirement that the property remains qualified as affordable housing under §92.254 for the period of affordability. Consequently, homebuyer housing with a Recapture Provision is not subject to the affordability requirements after the PJ has recaptured the HOME funds in accordance with its written agreement. If the ownership of the housing is conveyed pursuant to a foreclosure or other involuntary sale, the PJ shall attempt to recoup any net proceeds that may be available through the foreclosure sale. The PJ is subject to the limitation that when there are no net proceeds or net proceeds are insufficient to repay the HOME investment due, the PJ may only recapture the actual net proceeds, if any.

VI. REFINANCING POLICY

The PJ shall carefully review all requests for subordination on a case-by-case basis in order to protect its interests and the interests of the homebuyer. The conditions under which the PJ will agree to subordinate to new debt are as follows:

1. The refinancing must be necessary to reduce the owner's overall housing costs, OR
2. The refinancing must otherwise make the housing more affordable, AND
3. Refinancing for the purpose of taking out equity is not permitted.

Upon receipt of a subordination request from a lender or homebuyer, the PJ will review the terms of the refinancing to determine whether the above criteria are met. The PJ may require additional documentation from the homeowner or lender in order to make its determination. Once complete information is received, a subordination decision is made within 15 business days.

VII. MONITORING RESALE & RECAPTURE PROVISIONS

For HOME-assisted homebuyer projects, the PJ shall perform ongoing monitoring of the principal residency requirement during the period of affordability. Confirmation that the buyer is using the property as his or her principal residence may be accomplished by verifying that the buyer's name appears on utility company records or insurance company records for the home. In addition, postcard or letters mailed with "do not forward" instructions may demonstrate whether the buyer is receiving mail at the home.

Failure to comply with the resale or recapture requirements means that:

1. the original HOME-assisted homebuyer no longer occupies the unit as his or her principal residence (i.e., unit is rented or vacant), or
2. the home was sold during the period of affordability and the applicable resale or recapture provisions were not enforced.

In cases of noncompliance under either resale or recapture provisions, the PJ must repay to its HOME Investment Trust Fund in accordance with §92.503(b), any outstanding HOME funds invested in the housing. The amount subject to repayment is the total amount of HOME funds invested in the housing (i.e., any HOME development subsidy to the developer plus any HOME down-payment or other assistance (e.g., closing costs) provided to the homebuyer) minus any HOME funds already repaid (i.e., payment of principal on a HOME loan). Any interest paid on the loan is considered program income and cannot be counted against the outstanding HOME investment amount.

VIII. APPROVAL OF CHDO & SUBRECIPIENT PROVISIONS

CHDOs and Subrecipients carrying out development and/or homebuyer activities on behalf of the PJ shall be contractually bound to apply and implement these same Resale and Recapture Provisions, verbatim. As such, review and approval of these Provisions shall constitute an effective review and approval of the provisions used by the CHDOs and subrecipients.

APPENDIX B

DATA TO ESTABLISH 95% OF THE MEDIAN AREA PURCHASE PRICE FOR SINGLE FAMILY HOUSING IN METROPOLITAN NASHVILLE-DAVIDSON COUNTY

Metropolitan Nashville-Davidson County

Summary of Single Family New Construction Real Estate Sales for 3-Month Period November 2016 – January 2017

Month	Unit Type	Sales Volume	Median Price Based on 95%
November 2016	Single Family	155	\$307,236.65
December 2016	Single Family	199	\$404,700.00
January 2017	Single Family	140	\$314,060.50
	Average Volume & Median Sales Price for Months reviewed	494	\$341,999.05

Sales Volume for Single Family New Construction Units is less than 250 sales per month so 3 months' worth of sales data is required per HUD guidelines to establish a median sales price based on local data.

HUD Existing Home Single Family Limit effective March 1, 2017 - \$224,000 – median prices listed above for each of 3 months reviewed exceed this limit.

Compilation of Single Family Existing Real Estate Sales for 3-Month Period November 2016 – January 2017

Month	Unit Type	Sales Volume	Median Price Based on 95%
November 2016	Single Family – Existing	249	\$256,500.00
December 2016	Single Family – Existing	661	\$210,420.25
January 2017	Single Family – Existing	503	\$265,290.63
	Average Volume & Median Sales Price for Months reviewed	471	\$244,070.29

Sales Volume for December, 2016 and January 2017 exceeds the required 500 volume of sales per month so it would be possible to use the January, 2017 as the median per HUD guidelines.

HUD Existing Home Single Family Limit effective March 1, 2017 - \$198,000 – median prices listed above for each of 3 months reviewed exceed this limit.

Average Median Sales price for New Construction and Existing Construction is \$293,035

Due to the volume of the data, please contact the Community Development Department by phone at (615) 252-8505 or by email at consolidatedplan@nashville-mdha.org to request to view the source data.

APPENDIX C

FAIR HOUSING NARRATIVE

1. FAIR HOUSING BACKGROUND

Equal access to housing choice is a cornerstone principle of America's commitment to equality and opportunity for all. Title VIII of the Civil Rights Act of 1968, more commonly known as the Fair Housing Act, ensures protection of housing opportunity by prohibiting discrimination in the sale or rental of housing on the basis of race, color, religion, sex, and national origin. The Act was amended in 1988 to provide stiffer penalties, establish an administrative enforcement mechanism and to expand its coverage to prohibit discrimination on the basis of familial status and disability. The U.S. Department of Housing and Urban Development (HUD), and specifically HUD's Office of Fair Housing and Equal Opportunity (FHEO), is responsible for the administration and enforcement of the Fair Housing Act and other civil rights laws.

HUD holds recipients of Community Development Block Grant funds (i.e. entitlement communities), such as Metro Nashville, responsible for affirmatively furthering fair housing choice, as required by Section 808(e)(5) of the Fair Housing Act. In the past, these entitlement communities met the obligation by performing an "Analysis of Impediments to Fair Housing Choice" (AI) within their communities and developing and implementing strategies and actions to overcome any impediments to fair housing choice based on their history, circumstances, and experiences.

Through this process, Metro Nashville promotes fair housing choices for all persons, provides opportunities for racially and ethnically inclusive patterns of housing occupancy, identifies structural and systemic barriers to fair housing choice, and promotes housing that is physically accessible and usable by persons with disabilities.

On December 31, 2015, HUD published in the Federal Register the final Affirmatively Furthering Fair Housing (AFFH) Assessment Tool that CDBG grantees and public housing agencies (PHAs) must use to assess barriers to fair housing. During the 2017 Program Year, MDHA will undertake a joint Assessment of Fair Housing in accordance with the new rule. The purpose of this Assessment is to analyze challenges to fair housing and establish goals and priorities to address barriers. MDHA will perform the assessment on behalf of Metro Nashville's entitlement programs and the PHA. The assessment will be submitted to HUD in September 2017 and will be used to guide the creation of the next Five Year Consolidated Plan and the next Five Year PHA Plan.

2. Fair Housing in Nashville

MDHA works with a variety of local organizations to educate housing organizations and the general public on fair housing and offers some information and referral services itself. The key organizations in the Nashville area that participate in educational and compliance efforts are: the Tennessee Fair Housing Council, the Tennessee Human

Rights Commission, the Metro Human Relations Commission, and MDHA. Each organization has its own fair housing education goals and objectives and ideally, all of these organizations implement collaborative efforts to ensure that fair housing education is promoted.

The Tennessee Fair Housing Council is a nonprofit organization that was founded in 1995 by the Tennessee Fair Housing Council. Its primary mission is to eliminate housing discrimination in Tennessee through education and outreach, enforcement, and promoting technology in the fair housing field. A concerned citizen who believes discrimination has occurred would contact the Tennessee Fair Housing Council for advice and guidance. Similarly, for-profit or nonprofit housing organizations that need educational materials on fair housing and Tennessee fair housing laws may contact Tennessee Fair Housing Council as the primary contact and resource center in the state of Tennessee. In 2015, MDHA awarded funds to the Tennessee Fair Housing Council to conduct outreach, education, and testing in Nashville. The 2015 award allowed a continuation of the program that was originally started in 2014 with 2013 funds. The award allows for an extension into the 2017 Program Year.

The Tennessee Fair Housing Council receives fair housing complaints from citizens, investigates them and refers them, when warranted, to the Tennessee Human Rights Commission (THRC), HUD, and/or cooperating attorneys for further investigation. THRC is responsible for administering and enforcing the Tennessee Human Rights Act and the Tennessee Disability Act. The Commission is also responsible for coordinating the State’s compliance with Title VI of the Civil Rights Act of 1964. The organization’s mission to safeguard individuals from discrimination through enforcement and education is accomplished through a staff of investigators, attorneys, and other professional support staff. The Commission works in conjunction with HUD and the Equal Employment Opportunity Commission to coordinate investigations and to diminish duplication of efforts in ending discrimination.

3. Fair Housing Priority Needs and Strategies for Implementation

Metro Nashville’s 2013-2018 Consolidated Plan identified “Affirmatively Further Fair Housing Choice” as a priority need within the jurisdiction, for which several specific strategies, congruent with the impediments named in the Analysis of Impediments (AI), are outlined. Impediments and strategies to reduce such are listed in the table below:

IMPEDIMENT	STRATEGY
1. Scarcity of Affordable Rental Units	Increase the supply of affordable rental units.
2. Scarcity of Affordable Housing Units Accessible to People with Disabilities	Increase the supply of housing units for people with disabilities.
3. Lack of Fair Housing Education, Testing and Enforcement Capacity	Increase fair housing education and build capacity for testing and enforcement of fair housing law.

4. Uneven Distribution of Community Resources	Support improved access to community resources/implement a place-based strategy for community development.
5. Restriction on the Expansion of Protected Classes	Continue to operate in compliance with expanded protected class definitions found in federal regulations.

Listed below are the various actions that MDHA will attempt to undertake during the five-year period covered by the 2013 – 2018 Consolidated Plan to reduce the impediments identified in the table above.

Actions MDHA will take to Increase the Supply of Affordable Units

- 1a)** MDHA-controlled resources will be dedicated to the development of new rental units affordable to households at or below 60% AMI, with specific targets for the 0-30%, 31-50%, 51-60%, and 61-80% AMI categories and for units with 4+ bedrooms.
- 1b)** In addition to development of new units, MDHA will consider other opportunities to provide rental subsidies to low income households thus making existing units affordable.
- 1c)** MDHA will adopt a policy of 1:1 replacement of any affordable housing demolished or otherwise removed from MDHA’s inventory. Such replacement must constitute a comparable housing opportunity, but may not necessarily be a physical housing unit.

Increase the Supply of Housing Units for People with Disabilities

- 2a)** MDHA will develop and adopt a policy requiring a percentage of units in each MDHA-funded development be designed for accessibility by people with physical and/or mental disabilities (even when federal law exempts such units from accessibility requirements) and implement a 1:1 replacement standard for any housing lost from the Agency’s inventory of accessible units.
- 2b)** When contemplating the re-designation, redevelopment, or renovation of properties in the future, MDHA will develop a housing strategy in concert with stakeholders and advocates representing affected populations to ensure the displaced residents are provided appropriate housing opportunities. MDHA may count toward its accessible unit requirements units owned by other entities but funded by MDHA.
- 2c)** The Agency will require that any single-family housing built or financed by MDHA incorporate universal design/visitability standards. In the course of construction, MDHA will inspect all units it builds or finances and ensure strict compliance with building codes, particularly with respect to accessibility.

- 2d)** Further, Metro Nashville will continue to follow its process of inspection for compliance with building code provisions, including accessibility requirements, on all multifamily units for which a certificate of occupancy is issued. A further inspection after issuance of such a certificate will be performed if a complaint of non-compliance is received by the Property Standards Division of the Metro Codes. If a violation is found to have occurred, a citation or warrant will be issued and pursued in Environmental Court, as necessary to achieve compliance.

Increase Fair Housing Education and Build Capacity for Testing and Enforcement

- 3a)** MDHA will annually reserve a portion of its CDBG public service funds to be awarded as a competitive Fair Housing Grant to an organization that will carry out a comprehensive fair housing testing program in Metro Nashville, to specifically include an investigation of probable discrimination in the mortgage lending market and possible steering by real estate agents in areas where data indicates racial segregation. As an additional component of the Fair Housing Grant, the successful applicant will launch and sustain a robust public interest ad campaign to increase the public's awareness of housing discrimination and of the process for filing a complaint and increase opportunities for representation of victims of discrimination in the pursuit of legal recourse.
- 3b)** Further, MDHA will work toward increased coordination among the area's fair housing organizations by convening representatives of the organizations for the purpose of preparing a written plan outlining the goals and responsibilities of each organization in fair housing education, testing, and enforcement.
- 3c)** MDHA will sponsor specific education opportunities on Fair Housing Act compliance for landlords, builders, real estate agents, MDHA and Metro staff, and the public at large, making periodic training participation mandatory for Agency staff and entities contracting with the Agency.
- 3d)** MDHA will improve its outreach efforts to persons with Limited English Proficiency.

Support improved Access to Community Resources

- 4a)** MDHA will collaborate with Metro agencies on public infrastructure improvements that align with the goal of expanding housing choice.
- 4b)** MDHA will develop and implement an evaluation tool to be used when evaluating new projects that considers factors such as the proximity to

public transportation, healthy food options, schools, and public parks. Use of the evaluation tool will ensure that MDHA-funded developments create new housing opportunities in locations with optimum access to community resources.

4c) MDHA's role as a provider of gap financing will include financing for private affordable housing developers to make housing affordable in a variety of neighborhoods throughout Metro Nashville.

4d) MDHA will target resources in areas with high concentrations of poverty.

Continue to Operate in Compliance with Federal Regulations

5a) MDHA will continue to operate its housing programs in full compliance with the expanded protections found in federal regulations.

5b) MDHA will publicize its anti-discrimination policies and efforts, particularly noting its compliance with the *Equal Access to Housing in HUD Programs – Regardless of Sexual Orientation or Gender Identity* rule published in 2012.

5c) The Metro government passed Resolution RS2011-1810 authorizing Metro Legal to file an amicus brief in support of the plaintiffs currently engaged in litigation against the State regarding the Equal Access to Intrastate Commerce Act. Metro Nashville should continue to stand by this expression of support.

**2017 ACTION PLAN
PROPOSED FAIR HOUSING ACTIVITIES**

Impediment	Affected Group(s)	Activity
1) Scarcity of Affordable Rental Units	Race/color, National Origin, Religion, Sex, Familial Status, Disability	1a) MDHA has allocated the following amounts to produce targeted rental units for the 2017 program year: HOME: \$1,831,544 for New Construction or Rehab of Rental Housing; CDBG \$510,000 for Rental Rehab. During FY 2017 MDHA will announce funding opportunities; complete environmental review process; award funds for developers to start permitting and construction. MDHA may elect to undertake development as well. In addition to federal resources, it is anticipated that a portion of the monies from the Barnes Housing Trust Fund will also be allocated toward increasing the Rental Housing stock.
Estimated Staff Hours Required		2000
Performance Indicator		Funds allocated during the 2017 Program Year for the activities listed above are estimated to produce 50 affordable rental units when completed.
Responsible Entity/Method of Distribution		MDHA, CHDOs, Developers – all funding to CHDOs and Developers awarded through an open application or RFP process.

Impediment	Affected Group(s)	Activity
1) Scarcity of Affordable Rental Units	Race/color, National Origin, Religion, Sex, Familial Status, Disability	1b) MDHA will continually research and explore avenues that may become available through public and private sources to be utilized to expand the supply of subsidized existing units for low income households. To this end, MDHA made a decision to convert up to 900 Housing Choice Vouchers to Project-Based Vouchers and issued an RFP in 2016 to allow property owners to apply for this program. Interest has been high to date. Additionally, in 2017 MDHA launched an incentive program funded by Metro Nashville to encourage property owners to rent their units to homeless Veterans that are eligible for rental assistance under MDHA's VASH program. The program encourages landlord participation by will providing a lease signing bonus and payment of unpaid rent or damages after a VASH participant moves from a unit.
Estimated Staff Hours Required		2080 – MDHA Affordable Housing and Rental Assistance Department, and Grant Writer exploring new funding sources to expand the supply of subsidized units for low income households.
Timetable		Ongoing
Responsible Entity		MDHA

Impediment	Affected Group(s)	Activity
1) Scarcity of Affordable Rental Units	Race/color, National Origin, Religion, Sex, Familial Status, Disability	1d) MDHA will adopt a policy to provide a 1:1 replacement of any affordable housing demolished or otherwise removed from MDHA's inventory and that the replacement is to provide a comparable housing opportunity, but may not necessarily be a physical housing unit.
Estimated Staff Hours Required		Time for ongoing monitoring
Timetable		MDHA is implementing this policy.
Responsible Entity		MDHA

Impediment	Affected Group(s)	Activity
2) Scarcity of Affordable Housing Units Accessible to People with Disabilities	Disability	2a) MDHA will adopt a policy requiring a percentage of units in each MDHA newly-funded development be designed for accessibility by people with physical and/or mental disabilities (even when federal law exempts such units from accessibility requirements) and implement a 1:1 replacement standard for any housing lost from the Agency's inventory of accessible units.
Estimated Staff Hours Required		Time for ongoing monitoring.
Timetable		MDHA is implementing this policy.
Responsible Entity		MDHA

Impediment	Affected Group(s)	Activity
2) Scarcity of Affordable Housing Units Accessible to People with Disabilities	Disability	2b) When contemplating the re-designation, redevelopment, or renovation of properties in the future, MDHA will develop a housing strategy in concert with stakeholders and advocates representing affected populations to ensure the displaced residents are provided appropriate housing opportunities. MDHA may count toward its accessible unit requirements units owned by other entities but funded by MDHA.
Estimated Staff Hours Required		Ongoing
Timetable		Ongoing
Responsible Entity		MDHA

Impediment	Affected Group(s)	Activity
2) Scarcity of Affordable Housing Units Accessible to People with Disabilities	Disability	2c) Require any single-family housing built or financed by MDHA incorporate universal design/visitability standards. In the course of construction, MDHA will inspect all units it builds or finances and ensure strict compliance with building codes, particularly with respect to accessibility.
\$ for Activity		HOME: Program Year 2017 - \$216,769 New Construction
Estimated Staff Hours Required		60
Timetable		Ongoing
Performance Indicator		Units
Annual Goal		4
Responsible Entity/Method of Distribution		MDHA, CHDOs, Developers – all funding to CHDOs and Developers awarded through an RFP or application process.

Impediment	Affected Group(s)	Activity
2) Scarcity of Affordable Housing Units Accessible to People with Disabilities	Disability	2d) Metro Nashville will continue to inspect for compliance with building code provisions, including accessibility requirements, on all multifamily units for which a certificate of occupancy is issued. A further inspection after issuance of such a certificate will be performed if a complaint of non-compliance is received by the Property Standards Division of the Metro Codes. If a violation is found to have occurred, a citation or warrant will be issued and pursued in Environmental Court, as necessary to achieve compliance.
Estimated Staff Hours Required		0 Additional
Timetable		Ongoing
Responsible Entity		Metro Codes

Impediment	Affected Group(s)	Activity
3) Lack of Fair Housing Education, Testing, and Enforcement Capacity	Race/color National Origin Religion Sex Familiar Status Disability	3a) MDHA has allocated \$35,761 in 2017 CDBG public service funds to continue funding for the Tennessee Fair Housing Council to implement the program that started that started as part of competitive RFP that was issued in 2015. In addition to fair housing testing, the program includes investigations of probable discrimination in the mortgage lending market and possible steering by real estate agents in areas where data indicates racial segregation and to launch and sustain a robust public interest ad campaign to increase the public's awareness of housing discrimination; the process for filing a complaint; and increase opportunities for representation of victims of discrimination in the pursuit of legal recourse.

Estimated Staff Hours Required	1000
Timetable	Program Year 2017-2018
Performance Indicator	Persons
Annual Goal	200
Responsible Entity/Method of Distribution	MDHA and Tennessee Fair Housing Council

Impediment	Affected Group(s)	Activity
3) Lack of Fair Housing Education, Testing, and Enforcement Capacity	Race/color National Origin Religion Sex Familiar Status Disability	3b) MDHA or the Tennessee Fair Housing Council will convene a meeting with representatives of the area's fair housing organizations to discuss ways to work toward increased coordination and to prepare a written plan outlining the goals and responsibilities of each organization in fair housing education, testing, and enforcement.
Estimated Staff Hours Required		160

Timetable		Ongoing
Responsible Entity		MDHA and Fair Housing Partners

Impediment	Affected Group(s)	Activity
3) Lack of Fair Housing Education, Testing, and Enforcement Capacity	Race/color National Origin Religion Sex Familiar Status Disability	3c) MDHA thru its subrecipient, the Tennessee Fair Housing Council, will sponsor specific education opportunities on Fair Housing Act compliance for landlords, builders, real estate agents, MDHA and Metro staff, and the public at large, making periodic training participation mandatory for Agency staff and entities contracting with the Agency.
Estimated Staff Hours Required		160
Timetable		Ongoing
Responsible Entity		MDHA and the Tennessee Fair Housing Council. Partners

Impediment	Affected Group(s)	Activity
3) Lack of Fair Housing Education, Testing, and Enforcement Capacity	Race/color National Origin Religion Sex Familiar Status Disability	3d) MDHA thru its subrecipient, the Tennessee Fair Housing Council, will improve outreach efforts to publicize plans, programs, and reports to persons with Limited English Proficiency.
Estimated Staff Hours Required		50
Timetable		Ongoing
Responsible Entity		MDHA and the Tennessee Fair Housing Council Partners

Impediment	Affected Group(s)	Activity
4) Uneven Distribution of Community Resources	Race/color National Origin Religion Sex Familiar Status Disability	4a) MDHA will collaborate with Metro agencies on public infrastructure improvements that align with the goal of expanding housing choice.
Estimated Staff Hours		50
Timetable		Ongoing
Responsible Entity		MDHA, CHDOs, Developers.

Impediment	Affected Group(s)	Activity
4) Uneven Distribution of Community Resources	Race/color National Origin Religion Sex Familiar Status Disability	4b) MDHA will institute a point system to be utilized as a scoring factor in evaluating responses to RFPs and applications that will award higher points for developers proposing projects located in close proximity to public transportation, healthy food options, school, churches, employment centers, hospitals, public parks, etc.
Estimated Staff Hours		40
Timetable		Ongoing
Responsible Entity		MDHA, CHDOs, Developers.

Impediment	Affected Group(s)	Activity
4) Uneven Distribution of Community Resources	Race/color National Origin Religion Sex Familiar Status Disability	4c) MDHA will institute a point system to be utilized as a scoring factor in evaluating responses to RFPs and applications that will award higher points for developers proposing projects located outside areas with high poverty and minority concentration to encourage affordable housing development in a variety of neighborhoods throughout Metro Nashville.
Estimated Staff Hours		40
Timetable		Ongoing
Responsible Entity		MDHA, CHDOs, Developers.

Impediment	Affected Group(s)	Activity
5) Restriction on the Expansion of Protected Classes	Race/color National Origin Religion Sex Familiar Status Disability	5a) MDHA will continue to operate its housing programs in full compliance with the expanded protections found in federal regulations.
Estimated Staff Hours		0 Additional Hours
Timetable		Ongoing
Responsible Entity		MDHA, CHDOs, Developers.

Impediment	Affected Group(s)	Activity
5) Restriction on the Expansion of Protected Classes	Race/color National Origin Religion Sex Familiar Status Disability	5b) MDHA will provide information on its website and any published material pertaining to its anti-discrimination policies and efforts, particularly noting its compliance with the expanded regulatory protections.
Estimated Staff Hours Required		32
Timetable		Ongoing
Responsible Entity		MDHA

Impediment	Affected Group(s)	Activity
5) Restriction on the Expansion of Protected Classes	Race/color National Origin Religion Sex Familiar Status Disability	5c) The Metro government passed Resolution RS2011-1810 authorizing Metro Legal to file an amicus brief in support of the plaintiffs currently engaged in litigation against the State regarding the Equal Access to Intrastate Commerce Act. Metro Nashville should continue to stand by this expression of support.
Estimated Staff Hours Required		0 Additional Hours
Timetable		Ongoing
Responsible Entity		Metro Nashville

APPENDIX D

ACTIONS PLANNED TO DEVELOP INSTITUTIONAL STRUCTURE DELIVERY SYSTEM

Responsible Entity	Responsible Entity Type	Role/Program Served	Geographic Area Served
MDHA	Government	Homeowner and Rental Rehabilitation Programs	Metro Nashville
Developers, including CHDOs; MDHA	Private Developers/ Community Organizations; Government	Affordable Housing Program	Metro Nashville
MDHA/Metro Agencies	Government	Neighborhood Improvement Program	Metro Nashville; Tier 1 & Tier 2 Areas
Qualified Nonprofit Organizations/ Sponsors	Nonprofits as selected by Review Committee through Competitive RFP Process	ESG and HOPWA	Metro Nashville; MSA (HOPWA)
Qualified Subrecipient	Subrecipient organization	Business Technical Assistance and Microenterprise Program	Metro Nashville
Various Nonprofits and Public Agencies	Nonprofits and Public Agencies	Public Services Program	Metro Nashville
MDHA/Qualified Subrecipient	Government/private contractor	Planning	Tier 2 Areas

APPENDIX E SUMMARY OF CONSULTATIONS

Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdiction's consultations with housing, social service agencies and other entities.

To gather input for the 2017 Action Plan, MDHA held consultations on the following topics: affordable housing and fair housing, non-housing community development, and homelessness and housing for persons with AIDS. Partners, stakeholders, advocates, and government officials were invited. A summary of the responses from the consultation is provided in Appendix D.

- *Affordable housing and fair housing consultation:* Held on October 28, 2016, participants were invited to a Brown Bag lunch at which MDHA provided an overview of activities to address these needs during the current program year and eligible uses of CDBG and HOME funds to create and preserve affordable housing and affirmatively further fair housing. Participants were asked to identify barriers to affordable housing; prioritize activities to address affordable housing; prioritize subpopulations to be served by affordable housing programs; prioritize areas where funds for housing should be targeted; and provide suggestions for improving fair housing education.

Participants included representatives from affordable housing advocates; housing developers/providers some which are certified as Community Housing Development Organizations (CHDOs); realtors; and non-profit service providers.

- *Non-housing community development consultation:* Held on the evening of September 16, 2016, MDHA provided an overview of activities to address these needs during the current program year and eligible uses of CDBG funds. Participants were asked to list the top three barriers to reducing poverty; prioritize non-housing community development needs; list the top three specific non-housing community development activities; select locations where CDBG funds should be targeted; and select a preference between housing or non-housing for the use of CDBG funds.

Participants included at-large community members/leaders; Metro Arts Commission, Neighborhoods Resource Center, First Tennessee Bank, and local realtors.

- *Homelessness and housing for persons with AIDS consultation:* Held on September 15, 2016, MDHA provided an overview of activities to address these needs during the current program year and eligible uses of ESG and HOPWA funds at the monthly Continuum of Care general meeting held at the Nashville Rescue Mission. Participants were asked to prioritize activities to address

homelessness; prioritize sub-populations to be served by homeless assistance programs; prioritize activities to address housing to persons with HIV; list top three barriers to affordable housing for persons/families that are homeless or are at-risk of homelessness; list top three barriers to affordable housing for persons with HIV and their families; describe level of coordination for addressing homelessness among the CoC, housing providers; health, mental health and service agencies, and state and local government agencies and to provide one (1) recommendation for increasing coordination among these agencies; and to rate discharge coordination procedures between the following populations: youth aging from foster care/state custody; persons discharged from health care and mental health facilities; and persons discharged from correctional programs and institutions.

Participants included representatives from the Metropolitan Homelessness Commission, the Continuum of Care members and subrecipients of ESG and HOPWA funds.

Along with these consultations, MDHA met with representatives from the Mayor's Office, particularly from the Office of Neighborhoods and Community Engagement, Office of Economic Opportunity and Empowerment, and the Office of Economic and Community Development. MDHA provided an overview of the activities funded under the 2016 Action Plan and obtained their input on program priorities for 2017.

Because MDHA is the public housing authority for Nashville, staff is familiar in the needs of public housing residents. The Community Development Director meets weekly with the directors of public housing (Asset Management/Affordable Housing Department) and Section 8 (Rental Assistance Department) programs to collaborate on programs and provides input on the Agency's public housing plan.

Input received from all the consultations and meetings were considered when formulating funding priorities for the 2017 Action Plan.

Affordable Housing & Affirmatively Furthering Fair Housing

Comments and Analysis

MDHA hosted a consultation meeting on October 28, 2016 to discuss the Affordable Housing and fair housing needs/priorities for the 2017-2018 Action Plan. Invitees included representatives from local and state government, housing developers, financial institutions, social service providers, and realtors, etc. The meeting was held in the MDHA Cafeteria as a Brown Bag Lunch from 11:00 a.m. to 12:30 p.m. The meeting was attended by persons representing the following groups: Community Activists; Housing Developers/Providers, some certified as Community Housing Development Organizations (CHDOs); non-profit service providers. The sign-in sheets for the meeting are attached.

For this discussion, attendees were asked to complete idea rating sheets to recognize points of agreement among the group. They were asked to respond to the following series of questions and rate whether they were in strong agreement, agreement, neutral, disagreement, strong disagreement, or confused on an idea that was presented. Cumulative responses are summarized below:

- **What do you feel are the top barriers to affordable housing in Nashville-Davidson County?**

Several responses were given in this category. The concerns identified by the group were as follows.

1. Cost of land
2. Construction costs
3. Cost of capital
4. NIMBYism

Each of these barriers received a rating of strong agreement from the group.

- **Where do you think the priority needs to be focused to address affordable housing in Nashville-Davidson County? (activities and subpopulations)**

The top activities identified by the group were as follows.

1. Rental housing for large families at or below 60% AMI
2. Rental rehab
3. New construction rental housing for populations at or below 60% AMI
4. Build housing near jobs and services

New construction of rental housing and rental housing for large families for households at 60% received a rating of strong agreement. The group was in agreement that rental rehab should be a priority. However, half the group was in strong agreement and the other half were neutral that housing should be built near jobs and services

- **Which areas do you think funds should be targeted?**

The priorities identified by the group were as follows.

1. Transit oriented areas in close proximity to the urban core.
2. Low density residential zoned areas.
3. Areas in which <25% of units are affordable to households at 80% AMI.
4. Locate affordable housing in each Council district.
5. Neighborhoods of economic opportunity.

The group was in strong agreement that funds should be concentrated in transit oriented areas in close proximity to the urban core, low density residential zoned areas, and areas in which <25% of units are affordable to households at 80% AMI. The majority of the group was in agreement that funds should be used to build affordable housing in all Council districts, while one person strongly agreed with the idea. Most of the group strongly agreed that funds should be concentrated in neighborhoods of economic opportunity, while others were either in agreement or neutral to the idea.

- **What suggestions do you have for improving knowledge about fair housing and removing barriers to housing opportunities in Nashville-Davidson County?**

The priorities identified by the group were as follows.

1. Marketing and promotion of Fair Housing to consumers, landlords, and Realtors.
2. Billboard advertising.
3. Educational workshops.
4. Seminars at Council meetings.
5. Seminars at PTA meetings.
6. A course taken by tenants at lease signing for members of protected classes.
7. Distribute HUD's newest fair housing marketing materials to protected classes.

Marketing and promotion of fair housing to consumers, landlords, and Realtors, billboard advertising, and educational workshops received a strong agreement rating from the group in regard to increasing knowledge about fair housing. They were in agreement that seminars at council meetings and PTA meetings, and courses taken by tenants at lease signing for members of protected classes would improve knowledge about fair housing.

In addition, the idea that distributing HUD's newest marketing materials to protected classes would improve knowledge about fair housing received a rating of strong agreement from half of the group, while the other half were in agreement to the idea.

- **How can MDHA increase the effectiveness of its housing programs, other than an increase in funding?**
 1. Fund projects that offer diversity in housing types.
 2. Align submission dates with other funding sources.
 3. Use sources in addition to federal funds.
 4. Offer property tax credits.

The majority of the group was in strong agreement that MDHA could increase its effectiveness by funding projects that offer a diversity of housing types. Others in the group either agreed or were neutral to the idea. Aligning submission dates with other funding sources, using other sources in addition to federal funds and offering property tax credits received an agreement rating from the majority of the group, with one person being neutral to the idea.

MDHA will consider all of these comments along with the strategic goals and priorities as determined in the 2013-2018 Con Plan and other regulatory concerns when determining the distribution of funds for housing related activities for the 2017-2018 program year and action plan.

Non-Housing Community Development

Comments and Analysis

MDHA hosted a community-based consultation meeting on September 20, 2016 to discuss the Non-Housing Community Development needs for the 2017-2018 Action Plan. Members of several neighborhood communities and other leaders were invited to attend the meeting. The meeting was held at Randee Rogers Training Center at 5:30 PM. There were 7 community attendees – separated into two discussion tables.

For this discussion, only the non-housing needs for community development funds under CDBG were discussed. Housing needs, including those funded under CDBG, were discussed in a separate consultation. The following series of questions were asked of those in attendance. The cumulative responses are below:

1) List the top three barriers to reducing poverty

As this was a small group, all responses are provided.

- Inequitable distribution of resources and information
- Inequitable opportunities for education and training
- Lack of tangible and immediate growth on the personal level as well as the family services eligibility standards
- Jobs- pay rate increase
- Lack of affordable college education and trade training. Lack of workforce readiness programs or youth job training
- Affordable housing
- Educational inequity in schools
- Inability to connect those in poverty to resources/opportunities
- Lack of public infrastructure that boosts economy for all

2) Prioritize non-housing community development needs

For this question, attendees were asked to rank by priority the following community development activities:

- public facilities (i.e., community centers),
- public improvements and infrastructure (i.e. sidewalks, stormwater improvements),
- public services (i.e., healthy food initiatives, summer youth programs),
- and economic development (i.e., microenterprise assistance, façade loans).

The results showed that the attendees felt public services were the most important non-housing need. This was followed by economic development. Public improvements and infrastructure and public facilities rounded out the rankings respectively.

There were two additional comments - 1) Eligibility criteria needs to be adjusted in a way that is less punitive for families who participate and 2) Need youth employment, youth training and youth delinquency prevention

3) List the top three specific non-housing community development activities

Following up on question 2, the attendees were then asked to list their top 3 non-housing community development activities. The activities identified by the individuals were:

- Summer and yearlong or year round youth training and employment programs – mixed income, not just those at the lowest of the low income level.
- Business technical assistance for nontraditional/creative business ideas and pre-existing underfunded/unfunded small businesses.
- Create more pathways to home ownership for middle income as well as low income, especially households headed by single parents.
- Microenterprise, housing rehab, and sidewalks/neighborhood infrastructure improvements (lights, green space, parks, etc.)
- Summer internship programs
- Affordable housing

4) Select the location where CDBG funds should be targeted

For this question, the attendees were asked to rank the priority of low income areas for assistance. The areas were identified as:

- Areas with extremely high concentrations of poverty (i.e., 80% of HHs with AMI less than or equal to 80%)
- Areas with relatively high concentrations of poverty (i.e., 65% of HHs with AMI less than or equal to 80%)
- Any LMI area (i.e., 51% of HHs with AMI less than or equal to 80%)

The results showed the attendees felt relatively high areas of poverty concentration should receive the most funding. This was followed by extremely high areas and any LMI area respectively.

Additional comment: Make sure we are tracking/analyzing those areas that are changing because of gentrification (i.e. – areas that used to be 51% LMI are now over income, etc.)

5) Select the preference for use of CDBG funds

Even though the focus of this consultation was non-housing community development, attendees were asked to state their preference for the distribution of CDBG funds between Housing and Non-Housing Activities. The results showed that 1 attendee preferred that 75% of the CDBG funds be used towards housing needs, 2 attendees preferred 50% of funds toward housing needs, 1 attendee preferred 50% of funds toward non-housing needs and 1 attendee preferred 75% of funds towards non-housing needs. One person selected housing and non-housing both be split evenly between 50-75%.

Other Comments

No additional comments.

In summary, community members feel that housing needs are still the number one concern in their neighborhood communities. However, they also see the need and value in the use of CDBG funds for non-housing needs. Non-housing funds can be used to help address the barriers to reducing poverty such as education and job training/placement. Assistance to those areas with the high concentrations of poverty is most needed per the attendees. MDHA will consider all of these factors along with the strategic goals determined in the 2013-2018 Con Plan and other regulatory concerns when determining the distribution of CDBG funds – housing and non-housing –for the 2017-2018 program year and action plan.

Homelessness and Housing for Persons with AIDS 2016 Action Plan Consultation

Comments and Analysis

MDHA hosted a consultation meeting for Nashville-Davidson County ESG & HOPWA grantees during the monthly Continuum of Care meeting at the Nashville Rescue Mission on September 15, 2016. Forty people attended, representing twenty-nine agencies in the community.

This discussion was specific to housing and services needs for homeless persons in Nashville, as well as for people living with HIV/AIDS in the area. A “dotmocracy” method was used to determine the order of priorities.

Prioritize activities to address homelessness

- 1.) Emergency Shelter & Transitional Housing
- 2.) Prevention
- 3.) Rapid Re-housing
- 4.) Street Outreach

Although emergency shelter and transitional housing appeared as a higher priority than prevention, a general consensus was that if you achieve prevention there will be less need for the other activities. The immediate need for emergency shelters for domestic violence victims and the difficulties ensuring families meet the eligibility criteria for prevention were reasons that it did not get the top priority.

Prioritize subpopulations to be served by homeless assistance programs.

- 1.) Families
- 2.) Chronic
- 3.) Persons discharged from corrections programs and institutions
- 4.) Youth aging out of foster care/state custody

Persons who are “chronically homeless” often fall into multiple subcategories. Veterans have had enhanced access to SSVF and VASH services as a result of the national agenda to end homelessness among this population, which may be why the community prioritized them below other populations and they do not appear as a priority. It was suggested that focusing on youth now might avoid having to help later on in life.

Prioritize activities to address housing for persons with HIV

- 1.) Permanent housing facilities
- 2.) Tenant-based rental assistant (TBRA)
- 3.) Short-term rent, mortgage and utility assistance payments (STRMU)

List the top three barriers to affordable housing for persons/families that are homeless or are at-risk of homelessness.

- 1.) Affordable housing or housing stock
- 2.) Lack of adequate income
- 3.) Landlords will not accept people with questionable background histories (criminal, credit, rental etc.)

A close fourth pick was the lack of supportive services for those with mental health and substance abuse issues.

List the top three barriers to affordable housing for persons with HIV and their families

- 1.) Affordable and quality units & Permanent supportive housing
- 2.) Lack of adequate income
- 3.) Fear of discrimination and stigmas and lack of support

Describe the level of coordination for addressing homelessness among the following:

- 1.) CoC (5 votes for Strong, 19 Weak)
- 2.) Housing providers (1 vote for Strong, 5 votes in between S/W, 20 Weak)
- 3.) Health, mental health & Service agencies (14 votes for strong, 4 votes in between S/W, 9 for weak)
- 4.) Local and state govt. agencies (5 for Strong, 1 vote in between S/W, 21 for Weak)

Comments included lack of incentives for housing providers (i.e., landlords) and lack of funding as primary barrier to coordination of services for all areas.

Provide one recommendation for increasing coordination among the following: “CoC”

The CoC should not be only HUD focused. It should include all funding opportunities. It needs to better utilize HMIS/CES to analyze community needs. It also needs more open communication with community and those served to determine priorities based on community need.

Provide one recommendation for increasing coordination among the following: “Housing”

The general consensus was to more closely connect housing providers (public and private) with service providers, via a number of efforts:

- Developing a list of housing providers that serve low-income/homeless and their requirements

- Implement more effective communication among providers- using Information & Referral and/or Coordinated Entry System
- Provide incentives and support systems for landlords

Several participants suggested using the city's HMIS to accomplish some of the tasks above.

Provide one recommendation for increasing coordination among the following: "Health, Mental Health and service agencies"

More open communication between agencies providing services and mental health agencies. One method of expanding communication would be to utilize HMIS or an updated CES to ensure correct data on who is served and reduced duplication of services. The system should link all providers and resources to ensure greatest needs are met.

Provide one recommendation for increasing coordination among the following: "Local and State Government Agencies"

A more open communication between governments and community and non-profit experts to determine community needs. These discussions should lead to increase funding to agencies and/or a better distribution system of funding to the most needed areas.

Describe discharge coordination procedures for the following:

- 1.) Youth aging out of foster care/state custody (0 Strong, 13 Weak)
- 2.) Persons discharged from health care facilities (1 Strong, 17 Weak)
- 3.) Persons discharged from mental health facilities (1 strong, 16 Weak)
- 4.) Persons discharged from correctional programs and institutions (2 Strong, 3 in between S/W, 14 weak)

Provide one recommendation for increasing discharge coordination among the following: "Youth aging from Foster Care/State Custody"

Dedicated housing for transitional youth and a shift from state jurisdiction to agencies successfully helping transitional youth. Also suggests better connections with social workers and resources prior to release.

Provide one recommendation for increasing discharge coordination among the following: "Persons discharged from health care facilities"

A more direct link is needed between ALL local hospitals and housing/service providers that educates both sides so that care is coordinated prior to discharge. This would include education on cost effectiveness. The "Hospital to Home" program was suggested as good program and that it should expand.

Provide one recommendation for increasing discharge coordination among the following: “Mental Health Facilities”

Involve existing service & housing providers to integrate/educate at mental health facilities prior to discharge. Also, increased follow up, not just drop off so clients can maintain health program.

Provide one recommendation for increasing discharge coordination among the following: “Persons discharged from correctional programs and institutions”

Provide better services and contacts for services and/or placement opportunities before discharge. Try to ease restrictions on housing to those with recent discharge and/or create better communication system between agencies and landlords to work with those recently discharged.

Additional Comments:

1. It seems that the agencies that received more funding were all Housing First priorities.
2. We need more education on the populations and funding sources before the Dotmocracy – especially if we are inviting folks who are not normally a part of these discussions.
3. Need one person from each population at the table.
4. There is a need for more public access. More transparency and accountability.
5. Place MDHA/COC meetings onto Metro email delivery system (similar to MTA/RTA meeting notices).
6. Establish a standard, predictable, advertised board meeting location and agenda ahead of Board meetings.
7. I prefer the smaller specific meetings to do the “dotmocracies” that have been done in the past years.
8. Need more information about the agencies like Greater Nashville Regional Council’s involvement in ESG and HOPWA, especially due to the MOA the Greater Nashville Regional Council has with other state agencies (or MPO).

The need for more affordable housing, addressing barriers to housing entry such as criminal history and lack of transportation, and the need for more effective coordination were common threads running through this consultation. MDHA will consider all of these factors along with the strategic goals determined in the 2013-2018 Con Plan and other regulatory concerns when determining the distribution of ESG & HOPWA funds for the 2017-2018 program year and action plan.

APPENDIX F PUBLIC NOTICES

PUBLIC NOTICE

REQUEST FOR PUBLIC COMMENT AND NOTICE OF PUBLIC HEARINGS

2017-2018 ANNUAL UPDATE FOR PROGRAM YEAR FIVE (2017 ACTION PLAN) TO THE 2013-2018 CONSOLIDATED PLAN FOR HOUSING AND COMMUNITY DEVELOPMENT

Public Hearings: The Metropolitan Development and Housing Agency (MDHA) will host two public hearings on the draft 2017-2018 Annual Update for Program Year Five (2017 Action Plan) to the 2013-2018 Consolidated Plan for Housing and Community Development and on:

Saturday, April 29, 2017, 10:00 a.m.
J. Henry Hale Apartments Community Room
1433 Jo Johnston Avenue
Nashville, TN 37203

Tuesday, May 9, 2017, 5:30 p.m.
Levy Place Community Room
303 Foster Street
Nashville, TN 37207

Public Comment Period: Beginning Monday, April 17, 2017, the draft 2017 Action Plan will be available for public examination and comment. Members of the public may download copies from MDHA's website at www.nashville-mdha.org/consolidated-plan or may request copies by contacting the MDHA Community Development Department at 615-252-8505 or TDD at 615-252-8599. Also, copies will be available at MDHA's Community Development Department, located at 712 South Sixth Street, Nashville, TN 37206, between the hours of 7:30 a.m. and 4:00 p.m., Monday-Friday. MDHA will receive written comments through 4:00 p.m., central time, on Friday, May 19, 2017. Comments may be submitted electronically at consolidatedplan@nashville-mdha.org, faxed to 615-252-8533 (Attention: Consolidated Plan), mailed to MDHA Community Development Department, Attention: Consolidated Plan, P.O. Box 846, Nashville, TN 37202, or hand-delivered to MDHA Community Development Department, Attention: Consolidated Plan, 712 South Sixth Street, Nashville TN 37206.

Purpose and Summary: MDHA has prepared for submittal to the U.S. Department of Housing and Urban Development (HUD) a draft 2017-2018 Annual Update for Program Year Five (2017 Action Plan) to the 2013-2018 Consolidated Plan for Housing and Community Development.

The 2017 Action Plan describes community needs and funding priorities for the 2017-2018 program year (June 1, 2017 through May 31, 2018) and serves as Metropolitan Nashville-Davidson County's application for receiving funds for the following programs: Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), the Emergency Solutions Grant (ESG), and Housing Opportunities for Persons with AIDS (HOPWA). Proposed funding allocations are intended to address the priority needs identified in the 2013-2018 Consolidated Plan, as amended, and to benefit low- and moderate-income households and areas. Details regarding specific activities to be funded are provided in the 2017 Action Plan.

- Funding Priorities:**
- Increase the supply of affordable housing
 - Strengthen collaboration among network of service providers
 - Increase access to healthy food choices
 - Decrease homelessness
 - Develop and implement place-based strategies for community development
 - Provide summer programs for low- and moderate-income children and youth
 - Provide housing assistance for persons with HIV/AIDS
 - Affirmatively further fair housing

Anticipated Resources:

	CDBG	HOME	ESG	HOPWA
2017 Allocation	\$4,559,221.00	\$ 1,829,517.00	\$416,420.00	\$942,082.00
Estimated Program Income	\$ 191,000.00	\$ 178,896.00	\$ -	\$ -
Carryforward 2016 Funds	\$1,330,498.00	\$ 154,956.00	\$ -	\$ -
Reprogrammed 2016 Funds	\$ 105,276.91	\$ -	\$ -	\$ -
TOTAL	\$6,185,995.91	\$ 2,163,369.00	\$416,420.00	\$942,082.00

2017-2018 Proposed Allocations:

CDBG	
Project Type	Proposed Budget
Acquisition & Related Activities	\$ 230,082.00
Administration & Planning	\$ 950,044.00
Economic Development	\$ 794,155.50
Housing	\$ 2,742,577.50
Public Facilities & Infrastructure	\$ 783,375.91
Public Services	\$ 635,761.00
Other: Nonprofit Capacity Building	\$ 50,000.00
TOTAL	\$ 6,185,995.91

HOME	
Project Type	Proposed Budget
Administration	\$ 197,380.00
Homebuyer Programs	\$ 181,574.00
Homeowner Rehabilitation	\$ 0.00
Rental Programs	\$1,784,415.00
TOTAL	\$2,163,369.00

ESG	
Project Type	Proposed Budget
Administration	\$ 31,000.00
Emergency Shelter & Transitional Housing; Rapid Re-Housing; Street Outreach; Prevention;	\$ 370,420.00
HMIS	\$ 15,000.00
TOTAL	\$416,420.00

HOPWA	
Project Type	Proposed Budget
Administration	\$ 94,200.00
Facility-Based Operations; Short-term Rent, Mortgage & Utilities; Supportive Services	\$ 847,882.00
TOTAL	\$ 942,082.00

Request for Accommodations: MDHA makes every effort to provide reasonable accommodations to assist persons with disabilities. Any person needing assistance in accessing this information or who has other needs that require special accommodations may contact 615-252-8555 or TDD at 615-252-8599.

PUBLIC NOTICE IN SPANISH

NOTICIA PÚBLICA

SOLICITUD DE COMENTARIO PÚBLICO Y NOTIFICACIÓN DE AUDIENCIAS PÚBLICAS

2017-2018 ACTUALIZACIÓN ANUAL PARA EL AÑO CINCO (PLAN DE ACCIÓN 2017) AL PLAN DE CONSOLIDACIÓN 2013-2018 PARA VIVIENDA Y DESARROLLO COMUNITARIO

Audiencias públicas: El desarrollo metropolitano y Vivienda (MDHA) será la sede de dos audiencias públicas sobre el proyecto de Actualización Anual 2017-2018 para Five (2017) Plan de Acción del Programa Año en el plan consolidado 2013-2018 de Vivienda y Desarrollo de la Comunidad y en:

**Sábado 29 de abril,
J. Henry Hale Apartments Sala de estar**

Nashville, TN 37203

**Martes, 9 de mayo de 2017, 5:30 pm
Habitación Comunitaria Levy Place
303 Foster Street
Nashville, TN 37207**

Período de comentarios públicos: A partir del lunes, 17 de de abril de, 2017, el proyecto de Plan de Acción 2017 estará disponible para su análisis y comentarios del público. Los miembros del público pueden descargar copias de la página web de la MDHA en www.nashville-mdha.org/consolidated-plan o pueden solicitar copias poniéndose en contacto con el Departamento de Desarrollo de la Comunidad MDHA al 615-252-8505 o TDD al 615-252-8599. Además, las copias estarán disponibles en el Departamento de Desarrollo Comunitario de MDHA, localizado en 712 South Sixth Street, Nashville, TN 37206, entre las 7:30 am y las 4:00 pm, de lunes a viernes. MDHA recibirá comentarios por escrito hasta las 4:00 pm, hora central, el viernes, 19 de mayo de 2017. Los comentarios pueden ser enviados electrónicamente a consolidatedplan@nashville-mdha.org, por fax al 615-252-8533 (Atención: plan consolidado), Enviada por correo al Departamento de Desarrollo Comunitario de la MDHA, Atención: Plan Consolidado, PO Box 846, Nashville, TN 37202, o entregada en mano al Departamento de Desarrollo Comunitario de MDHA, Atención: Plan Consolidado, 712 South Sixth Street, Nashville TN 37206.

Objeto y Resumen: MDHA ha preparado para su sometimiento a la Departamento de Vivienda y Desarrollo Urbano (HUD), un proyecto de Actualización Anual 2017-2018 Programa para el Año Cinco (2017 Plan de acción) para el plan consolidado 2013-2018 de Vivienda y Desarrollo de la Comunidad de Estados Unidos.

El Plan de Acción 2017 describe las necesidades de la comunidad y las prioridades de financiamiento para el año del programa 2017-2018 (del 1 de junio de 2017 al 31 de mayo de 2018) y sirve como solicitud del Condado Metropolitano Nashville-Davidson para recibir fondos para los siguientes programas: Subvención de Desarrollo Comunitario (CDBG), el Programa de Asociaciones de Inversión HOME (HOME), el Subsidio de Soluciones de Emergencia (ESG) y Oportunidades de Vivienda para Personas con SIDA (HOPWA). Las asignaciones de fondos propuestas tienen por objeto atender las necesidades prioritarias identificadas en el Plan Consolidado 2013-2018, según enmendado, y beneficiar a hogares y áreas de ingresos bajos y moderados. En el Plan de Acción de 2017 se proporcionan detalles sobre las actividades específicas que han de financiarse.

Prioridades de financiamiento:

- Aumentar el suministro de vivienda asequible.
- Fortalecer la colaboración entre la red de proveedores de servicios.
- Aumentar el acceso a las opciones de alimentos saludables.
- Disminuir la falta de vivienda.
- Desarrollar e implementar estrategias basadas en el lugar para el desarrollo comunitario.
- Proporcionar programas de verano para niños y jóvenes de bajos y moderados ingresos.
- Proporcionar asistencia de vivienda para personas con VIH/SIDA.
- Afirmativamente más justa vivienda.

Recursos Anticipados:

	CDBG	HOME	ESG	HOPWA
Asignación 2017	\$	\$ 1,829,517.00	\$ 416,420.00	\$ 942,082.00
Ingresos estimados del programa	\$ 191,000.00	\$ 178,896.00	\$ -	\$ -
Carryforward 2016 Fondos	\$ 1,330,498.00	\$ 154,956.00	\$ -	\$ -
Reprogramación de Fondos 2016	\$ 105,276.91	\$ -	\$ -	\$ -
TOTAL	\$ 6,185,995.91	\$ 2,163,369.00	416,420.00	\$ 942,082.00

2017-2018 Asignaciones propuestas:

CDBG	
Tipo de proyecto	Presupuesto propuesto
Adquisición y actividades relacionadas	\$ 230,082.00
Administración y planificación	\$ 950,044.00
Desarrollo económico	\$ 794,155.50
Alojamiento	\$ 2,742,577.50
Instalaciones públicas e infraestructura	\$ 783,375.91
Servicios Públicos	\$ 635,761.00
Otros: Construcción de capacidad sin fines de lucro	\$ 50,000.00
TOTAL	\$ 6,185,995.91

HOME	
Tipo de proyecto	Presupuesto propuesto
Administración	\$ 197,380.00
Programas para compradores de vivienda	\$ 181,574.00
Rehabilitación de Propietarios	
Programas de alquiler	\$ 1,784,415.00
TOTAL	\$ 2,163,369.00

ESG	
Tipo de proyecto	Presupuesto propuesto
Administración	\$ 31,000.00
Refugio de Emergencia y Vivienda de Transición; Re-Vivienda Rápida; Alcance de la calle; Prevención	\$ 370,420.00
HMIS	\$ 15,000.00
TOTAL	\$ 416,420.00

HOPWA	
Tipo de proyecto	Presupuesto propuesto
Administración	\$ 94,200.00
Operaciones basadas en instalaciones; Alquiler a corto plazo, hipoteca y servicios públicos; Servicios de Apoyo	\$ 847,882.00
TOTAL	\$ 942,082.00

Solicitud de modificaciones: MDHA hace todo lo posible para proporcionar medidas razonables para ayudar a las personas con discapacidad. Cualquier persona que necesite ayuda para acceder a esta información o que tenga otras necesidades que requieran acomodaciones especiales puede comunicarse con el 615-252-8555 o TDD al 615-252-8599.

如果需要本通知的中文翻译，请打电话 615-252-8505

Để nhận một bản dịch Tiếng Việt của thông báo này, vui lòng gọi: 615-252-8505

لوصللا لى لء ءمءرء ءءبءء اءهء الببءء، لى ءرءء لءصءءلا ءء: 615-252-8505

Haddii aad rabto qoraalkan oo af-Soomaali lagu tarjumay haddii aad doonayso fadlan naga soo wac: 615-252-8505

Declaración de no-discriminación: MDHA no discrimina por razones de edad, raza, sexo, orientación sexual, identidad de género, información genética, color, origen nacional, religión, discapacidad o cualquier otra condición protegida en la admisión, el acceso a, O operaciones de sus programas, servicios o actividades.



Disclaimer: Este documento fue traducido del inglés al español usando "Google Translation" por lo tanto, MDHA no puede garantizar la exactitud del texto convertido.

APPENDIX G

SUMMARY OF PUBLIC COMMENTS AND MDHA'S RESPONSES

Comments/Questions received at the April 29, 2017 Public Hearing -

Q. Why did we have to do a substantial amendment in August 2013 so soon after the original plan was approved in July of 2013.

A. To revise/define/clarify the place-based strategy and make budget revisions to allocate funds to new projects from projects where the funds were not fully used.

Q. What does "Restriction on expansion of protected classes" mean?

A. A current Tennessee law passed in 2011 known as the "Equal Access to Intrastate Commerce Act" prevents the extension of fair housing protections by local governments to groups or classes not explicitly protected under state law. Because it nullified all existing and prevents any future extensions of protection from discrimination of nearly every kind (including housing discrimination) based on any status not already included in state law, the Act represents an impediment to fair housing choice in Nashville.

Q. Why the need for carryforward funds?

A. For projects that take longer than one year to implement, such as infrastructure/sidewalk projects.

Q. What is the definition of substantial amendment?

A. A substantial amendment, as described in our Citizen Participation Plan, is needed when one of the following criteria occurs and the public must be informed and provided an opportunity to comment on the change:

- a change in funding allocation priorities described in the Consolidated Plan,
- a new program not previously described in an annual action plan,
- the deletion of an activity described in the Consolidated Plan,
- a budget amendment for any program of more than twenty-five percent (25%), or
- a substantial amendment is required by HUD.

Q. What is program Housing Program delivery cost?

A. Staff costs associated with carrying out Housing Rehabilitation Programs, such as inspections.

Q. How do you determine goals?

A. We try to be conservative and realistic and on programs such as Homeowner Rehabilitation, we look at past history and average cost/house.

Q. Why did the HOME dollars for homeownership projects decrease?

A. There is a greater demand for rental units, and a large portion of last year's funds went toward homeownership projects that are still in the process of being constructed and sold.

Q. What was the 108 loan for?

A. Land acquisition and improvements on the East Bank of the Cumberland River to eliminate slum and blight and construction of a greenway.

Comment - Recommend - 2 slides to page next time on power point.

No comments/questions were received at the May 9, 2017 public hearing.

No comments/questions were received in any other formats during the comment period.

APPENDIX H

SF 424 and CERTIFICATIONS

To be updated once the Metro Council approves the Action Plan and Mayor Barry signs all documents.

METROPOLITAN NASHVILLE-DAVIDSON COUNTY, TENNESSEE

EXHIBITS

**2017-2018 ANNUAL UPDATE
TO THE
2013-2018 CONSOLIDATED PLAN
FOR
HOUSING AND COMMUNITY DEVELOPMENT
PROGRAM YEAR FIVE**

For the period June 1, 2017 – May 31, 2018

Prepared by:

Metropolitan Development and Housing Agency
701 South Sixth Street
Nashville, Tennessee 37206



Updated June 2017

2017-2018 Annual Update to the 2013-2018 Consolidated Plan

(2017 Action Plan) Program Year Five

EXHIBITS

Exhibit 1 – CPD Notice 16-18, HUD Guidance on Submitting Consolidated Plans and Annual Updates for Fiscal Year (FY) 2017

Exhibit 2 – HUD Approval to Change Consolidated Plan Program Year

Exhibit 3 – Notice of 2017 Allocations

Exhibit 4 – Geographic Priorities/Place-Based Census Tracts

Exhibit 5 – Determining a Census Tract Number

EXHIBIT 1

CPD NOTICE 16-18

**GUIDANCE ON SUBMITTING CONSOLIDATED PLANS AND ANNUAL ACTION
PLANS FOR FISCAL YEAR 2017**



OFFICE OF COMMUNITY PLANNING
AND DEVELOPMENT

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-7000

Special Attention of:
All CPD Division Directors
HUD Field Offices
HUD Regional Offices
All CDBG Grantees
All HOME Participating Jurisdictions
All HTF Grantees
All ESG -Grantees
All HOPWA - Grantees

NOTICE: CPD-16-18
Issued: December 15, 2016
Expires: September 30, 2017

Cross Reference: 24 CFR Part 91

Subject: Guidance on Submitting Consolidated Plans and Annual Action Plans
for Fiscal Year (FY) 2017

Purpose:

The purpose of this Notice is to instruct all Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), Housing Trust Fund (HTF), Emergency Solutions Grants (ESG) and Housing Opportunities for Persons with AIDS (HOPWA) grantees on the timing of submission of FY 2017 consolidated plans and action plans. This Notice provides instructions to grantees/participating jurisdictions under each of these programs regarding costs incurred prior to execution of a grant agreement. This Notice further informs Entitlement CDBG grantees and HOME participating jurisdictions of waivers being made available to certain grantees/participating jurisdictions to assist in the implementation of the pre-award costs instructions. These procedures apply equally to grantees' 3-5 year consolidated plans as well as to annual action plans (either as a stand-alone document or as a component of the overall consolidated plan submission).

Notes regarding applicability:

This Notice uses the term "grantee" generically, to also include HOME participating jurisdictions, except where the term appears in discussions explicitly limited to one of the other covered funding programs. Provisions of this Notice covering the Entitlement CDBG program also apply to Insular Areas grantees and CDBG nonentitlement county grantees in Hawaii, as the Entitlement CDBG program regulations also apply to their CDBG funds.

Background:

Pursuant to 24 CFR 91.15(a)(1), each jurisdiction should submit its consolidated plan to HUD at least 45 days before the start of its program year. The earliest date on which HUD will accept a consolidated plan or action plan submission is November 15, 2016; and the latest submission deadline is August 16, 2017. However, in most years, HUD does not receive its annual funding appropriation until several months into the federal fiscal year (rarely earlier than December,

www.hud.gov

espanol.hud.gov

and sometimes as late as April). Once a fiscal year's appropriation is enacted, HUD needs time to compute grantees' allocation amounts for the programs covered by the consolidated plan. The Housing Trust Fund (HTF) Program is funded by the mandatory assessments on Fannie Mae and Freddie Mac -Government-Sponsored Enterprises (GSEs) and the assessments will not be transferred to the U.S. Treasury Department until March 2017. When appropriations are significantly delayed, grantees with program year start dates prior to the announcement of allocations do not know their actual allocation amounts when they are developing their plans, conducting citizen participation, and submitting their plans.

According to 24 CFR 91.500(a), a plan will be deemed approved 45 days after HUD receives the plan, unless HUD notifies the jurisdiction before that date that the plan is disapproved. In past years, HUD typically did not disapprove a plan solely because it was based on estimated allocation amounts. As a result, a plan submitted by a grantee before its allocation amounts are announced typically received automatic approval, even though the plan did not list the grantee's actual allocation amounts.

This practice resulted in significant additional work for both HUD and grantees. After the actual allocation amounts were announced, a grantee had to submit a revised, re-signed SF-424 form listing the actual allocation amounts for each of its grants. In many cases, the grantee had to make additional changes to amend its plan to reflect its actual allocation amounts. This may have constituted a substantial amendment under 24 CFR 91.505, which is subject to the grantee's citizen participation plan process. For FY 2017, HUD will not execute a grant agreement with a grantee until HUD has received a plan (or an amended plan) which incorporates the actual allocation amounts a grantee is to receive for that fiscal year.

Revised Procedures for Submission of FY 2017 Consolidated Plans and Action Plans by Grantees with Early Program Year Start Dates:

HUD is issuing the following revised procedures to govern the submission and review of consolidated plans and action plans for FY 2017 funding prior to computation of FY 2017 allocation amounts. These procedures will apply to any grantee whose normal consolidated plan/action plan submission deadline (45 days before the start of the program year) falls either before, or less than 60 days after, the date HUD announces FY 2017 allocation amounts for CDBG, ESG, HOME and HOPWA funding. (See Section II. for a discussion of the timing of Housing Trust Fund allocations.)

Congress has not completed the appropriations process for HUD's FY2017 appropriation. At this time, HUD cannot predict when its FY 2017 appropriations bill will be enacted and when it will be able to announce FY 2017 allocation amounts. Thus, HUD cannot say how many grantees – or which program year start dates – will be subject to these revised procedures. Similarly, HUD cannot provide estimated FY 2017 allocation amounts for grantees to use for planning purposes in developing annual action plans.

Note: These procedures will not apply to grantees whose normal consolidated plan/action plan submission deadline is more than 60 days after HUD announcement of FY 2017 allocation

amounts; those grantees should have sufficient time to revise their plans to match actual allocation amounts prior to the due date for their plan.

I. Revised Submission Dates for FY 2017 Action Plans for CDBG, ESG, HOME, HOPWA

Grantees are advised not to submit their consolidated plan/action plan until after the FY 2017 allocations have been announced. Grantees due to submit a new 3-5-year consolidated plan in FY 2017 should refrain from submitting the overall consolidated plan as well as the FY 2017 action plan contained within the overall document. HUD cannot complete its review of the overall consolidated plan components independent of the current year's action plan component. Once HUD informs grantees of their FY 2017 funding allocation amounts, each grantee should, prior to submission, ensure that the actual FY 2017 allocation amounts are reflected in the form SF-424, in the description of resources and objectives, and in the description of activities to be undertaken (or, for states, the method of distribution). It may be necessary for a grantee to revise its action plan before submission to HUD.

An affected grantee may delay submission of its consolidated plan or action plan to HUD until 60 days after the date allocations are announced, or until August 16, 2017 (whichever comes first). This delay will give a grantee time to revise its action plan to incorporate actual allocation amounts, and to conduct any additional citizen participation, if necessary.

For example, if HUD were to announce the FY 2017 allocation amounts to grantees on April 28, 2017:

- For grantees with January 1 – June 1 program year start dates, their normal plan submission date would have been before the date that HUD announced allocation amounts. These grantees would be able to postpone submission of their consolidated plan/action plan until June 26, 2017.
- For grantees with July 1 and August 1 program year start dates, their normal plan submission date would be less than 60 days after HUD's announcement of allocation amounts. These grantees would also be able to postpone submission of their consolidated plan/action plan until June 26, 2017.
- Grantees with September 1 and October 1 program year start dates would have more than 60 days between the date of announcement of allocations and the normal submission deadline for their consolidated plan/action plan. These grantees would be expected to submit their plan on time.

However, in no case may a consolidated plan/action plan be submitted to HUD later than August 16, 2017. Failure to submit an action plan for FY 2017 by August 16, 2017, will result in the automatic loss of FY 2017 CDBG funds to the grantee. This requirement is established by statute, and HUD cannot waive the August 16 submission deadline. Funding under other CPD programs are not subject to this deadline but, since virtually all CPD grantees receive CDBG

funding, the CDBG submission requirement effectively establishes the deadline for submission of action plans.

The regulations, at 24 CFR 91.15(a)(1), state that "... each jurisdiction should submit its consolidated plan at least 45 days before the start of its program year." HUD has determined that it is not necessary to waive this provision in order to implement the procedures in this Notice for FY 2017 action plans. This provision does not prohibit a grantee from submitting a plan in the eCon Planning Suite after that time. It is not necessary for an affected grantee to request an exception to its normal action plan submission date under 24 CFR 91.15(a)(1), nor is it necessary for a field office to grant an exception to the action plan submission deadlines, under 24 CFR 91.20, in order to implement the procedures in this Notice.

II. Submission Process for the HTF Program

The Housing Trust Fund (HTF) is an affordable housing production program to increase and preserve the supply of decent, safe, and sanitary affordable housing for extremely low-income and very low-income families. HTF is a formula grant program for states.

The HTF rule at 24 CFR 93.100 requires each state to include its HTF allocation plan in its annual action plan as described at 24 CFR 91.320(k)(5). The HTF allocation plan describes the method for the distribution of funds, and establishes the application requirements and criteria for selecting applications. The rule also requires a local jurisdiction that receives a subgrant of HTF funds from the state to include a HTF allocation plan (24 CFR 91.220(l)(5)) in its annual action plan, but due to the timing of the publication of HTF allocations, the local jurisdiction may need to amend its annual action plan to include HTF.

The timing of the HTF allocations is different from other CPD programs (CDBG, HOME, HOPWA, and ESG) because the source of funding is the mandatory assessments on Fannie Mae and Freddie Mac rather than Federal appropriations. The earliest HUD expects to publish the HTF allocations is April 2017. This will likely be well after the date that allocations for other CPD programs will be announced. A state may submit its consolidated plan/action plan for the other CPD programs before the HTF allocations are published and then submit its HTF allocation plan as a substantial amendment to its annual action plan, after the HTF allocations are published.

The state or the entity designated by the state to be the HTF grantee may begin to develop its HTF allocation plan following its citizen participation process in accordance with its consolidated plan citizen participation plan before the publication of the HTF allocations. However, the state may not submit its HTF allocation plan before its HTF allocation has been published. HUD recommends the state use its 2016 HTF allocation as a baseline allocation estimate when conducting citizen participation.

III. HUD Review of Action Plans

HUD will review a consolidated plan/action plan in accordance with 24 CFR 91.500(b). The 45-day review period will begin whenever the eCon Planning Suite submission or executed SF-424(s) are received by the field office, whichever is later. HUD will disapprove as substantially

incomplete any consolidated plan or action plan covering FY 2017 funding that does not reflect actual CDBG, HOME, ESG and HOPWA allocation amounts on the form SF-424(s), in the description of resources and objectives, and in the description of activities to be undertaken (or, for states, the method of distribution). A grantee whose action plan is disapproved for this reason is advised to not resubmit a revised plan until HUD has announced the actual FY 2017 allocation amounts, and until the grantee has incorporated the actual allocation amounts into its plan. (See Section II regarding including the HTF program in an original or amended consolidated plan/action plan.)

24 CFR 91.500(b) states HUD may disapprove a plan or a portion of a plan if it is inconsistent with the purpose of the Cranston-Gonzalez National Affordable Housing Act (42 U.S.C. 12703), if it is substantially incomplete, or, in the case of a CDBG certification under §91.225(a) and (b) or §91.325(a) and (b), if it is not satisfactory to the Secretary in accordance with §570.304, §570.429(g), or §570.485(c). The following are examples of substantially incomplete plans:

- (1) A plan developed without the required citizen participation or the required consultation;
- (2) A plan fails to satisfy all the required elements in 24 CFR Part 91, as reflected in the eCon Planning Suite. This includes when the grantee has not provided a final statement of community development objectives and the projected use of funds;
- (3) A plan for which a certification is rejected by HUD as inaccurate; and
- (4) A plan without a description of the manner in which the unit of general local government or state will provide financial or other assistance to a public housing agency if the public housing agency is designated as “troubled” by HUD.

24 CFR 91.500(d) states that “(t)he jurisdiction may revise or resubmit a plan within 45 days after the first notification of disapproval.” HUD has determined that it is not necessary to waive this provision in order to implement the procedures in this Notice for FY 2017 consolidated plans/action plans. This provision does not prohibit a grantee from re-submitting a plan after that time period.

24 CFR 91.105(c), 91.115(c) and 91.505 require a grantee to comply with citizen participation requirements when it undertakes a substantial amendment to an approved plan. A plan that has been disapproved by HUD is, by definition, not an approved plan. When a grantee’s plan is disapproved by HUD, the consolidated plan regulations do not necessarily require a grantee to undertake further citizen participation on the changes the grantee makes before re-submitting it. (A major exception to this, however, would be if the reason for disapproval involved the grantee’s failure to fulfill citizen participation requirements to begin with.) However, as noted in this Notice, there are circumstances in which a grantee may need to make major revisions to a disapproved plan, which could trigger further citizen participation efforts. A grantee with a disapproved plan should review its citizen participation plan and local policies to determine whether it will need to conduct further citizen participation as a result of the changes it makes to incorporate actual allocation amounts into its plan, prior to re-submission of the revised plan.

IV. Development of Proposed Action Plans and Citizen Participation During The Interim

A grantee has several options regarding fulfilling its citizen participation obligations while waiting for HUD to announce FY 2017 allocation amounts:

- a. A grantee may conduct citizen participation on its draft plan (with estimated funding amounts) according to its normal timetable and citizen participation procedures. (Grantees are cautioned, though, that they should not submit their plan until allocation amounts are known.) A grantee doing so should make clear that the funding levels shown are estimated amounts. In addition, the grantee should include “contingency provision” language in its action plan which explains how it will adjust its proposed plan to match its actual allocation amounts, once actual amounts become known. By including such contingency language, a grantee can avoid the need to make significant revisions to its plan (beyond incorporating the final allocation amounts into the plan and the SF-424 form). The grantee may also avoid the potential need to conduct additional citizen participation on a plan that has to be significantly revised in order to reflect actual allocation amounts.

Examples of contingency provisions include:

- A plan could state that all proposed activities’ budgets will be proportionally increased or decreased from the estimated funding levels to match actual allocation amounts.
- A grantee could express its budget in terms of percentages of the allocation to be budgeted to each planned activity, along with the grantee’s current estimate of how many dollars that equates to for each activity. [For example, regardless of what the final allocation amounts are, the United Interfaith Street Outreach Program will receive 22% (currently estimated to be approximately \$38,000) of the grantee’s total ESG allocation, and the Tenant-Based Rental Assistance activity will receive 10% (currently estimated to be about \$68,750) of the HOME allocation.]
- A plan could state that any increase or decrease in funding to match actual allocation amounts will be applied to one or more specific activities (e.g., any increase or decrease relative to the grantee’s estimated allocation amount will be applied to the single family housing rehabilitation grant program).
- A plan could list its proposed activities in priority order and indicate that the East Side Sidewalk Replacement activity listed in the plan is a “backup” activity that will be funded only if sufficient CDBG funding exists; or conversely, if the grantee’s actual allocation is less than estimated, the East Side Sidewalk Replacement activity will not be funded in FY 2017.
- A plan could state that, should the actual allocation amount exceed the grantee’s estimate, the grantee will increase the Uptown Sewer Separation activity budget and will extend the service area block-by-block along the 600-900 blocks of Cherry Street, based on the amount of additional funding available.

A grantee may include these or other comparable provisions singly or in any combination to meet its needs. A grantee may adopt a different contingency approach for each of the programs covered by this Notice (CDBG, ESG, HOME, HOPWA and HTF).

- b. Alternatively, a grantee may prepare a proposed action plan according to its normal timetable, but wait until actual allocation amounts are known before undertaking citizen participation actions. Once allocation amounts are announced by HUD, the grantee will need to update relevant sections of its plan (such as the listings of resources and objectives, and the description of activities or the state's method of distribution) to reflect actual allocation amounts before conducting citizen participation. All grantees intending to incur pre-award costs under the programs covered by this Notice should be aware that this option will not be available to them, as citizen participation requirements must be met before pre-award costs are incurred. (See section V. below.)

HUD has developed these procedures to minimize disruption to grantees and to minimize duplication of effort on grantees' part. A grantee that does not follow either option a. or b. above (i.e., the grantee undertakes citizen participation according to its normal timetable, based solely on estimated funding levels, and the plan does not contain any contingency language on how the final plan will be adjusted to match actual allocation amounts) runs the risk of increasing its own work obligations and costs. The grantee will still be required to update its plan to incorporate actual allocation amounts before submission to HUD. The grantee may need to undertake additional publication and citizen participation processes, depending on the difference between its actual allocation amounts and the estimated amounts in its proposed action plan, and how the grantee plans to adjust its proposed activities in order to match its actual allocation amounts. Local policies and procedures may also require the grantee to obtain re-approval of the revised plan from its legislative body or authorizing officials.

A plan that has not yet been submitted to HUD is also not an approved plan, and is not subject to the citizen participation requirements of a substantial amendment. However, a grantee that delays its plan submission should review its citizen participation plan and local policies to determine whether it will need to conduct further citizen participation as a result of the changes it makes to incorporate actual allocation amounts into its plan, prior to its submission.

V. Pre-Award Costs

A. General Provisions applicable to all Consolidated Plan programs

Special attention must be paid to situations in which a grantee wishes to incur costs prior to grant award. For example, under certain programs, a grantee may want to execute annual renewals of agreements with social service providers in order to prevent interruption of social services. The annual performance cycle of these agreements might normally begin after the grantee's official program year start date but, under this Notice the grantee cannot even submit its Action Plan until after the date that the agreements need to be executed. Thus, the timing instructions in this Notice may cause some program costs to be classified as pre-award costs where they would otherwise not have been.

The government-wide Uniform Administrative Requirements, Cost Principles and Audit Requirements regulation, at 2 CFR Part 200, contains language concerning agency approval of pre-award costs. The language at 2 CFR 200.458 applies to any program that does not have its own separate provisions concerning authorization of pre-award costs:

§ 200.458. Pre-award costs. Pre-award costs are those incurred prior to the effective date of the Federal award directly pursuant to the negotiation and in anticipation of the Federal award where such costs are necessary for efficient and timely performance of the scope of work. Such costs are allowable only to the extent that they would have been allowable if incurred after the date of the Federal award and only with the written approval of the Federal awarding agency.

The ESG, HOPWA and HTF program regulations do not contain program-specific language establishing pre-award cost requirements for those programs; the CDBG and HOME program regulations do contain pre-award cost requirements unique to those programs. (However, the HOME requirements apply only to certain types of pre-award costs.) The following guidance applies to all five programs. Additionally, guidance unique to each separate program is provided below.

The Part 91 consolidated plan regulations make distinctions between a “proposed plan” and “a plan”. Most notably, 24 CFR 91.105(b) and 91.115(b) describe the citizen participation requirements for a grantee’s proposed plan. For purposes of this Notice regarding pre-award costs, HUD considers a grantee’s plan to have moved from being “a proposed plan” to being “a plan” once a grantee has completed the publication, public hearing and public comment requirements at 24 CFR 91.105(b)(2), (3) and (4) or 91.115(b)(2), (3) and (4), and has developed its written summary of comments received pursuant to 24 CFR 91.105(b)(5) or 91.115(b)(5).

To minimize additional workload on grantees and HUD field offices, this Notice establishes the following procedures implementing the 2 CFR 200.458 requirements cited above. This Notice provides HUD approval to incur pre-award costs if and when the grantee completes the following documentation in its local files:

1. The grantee documents that the costs incurred prior to grant award are necessary for efficient and timely performance of the activity in question.
2. The grantee documents that the costs are for eligible activities under the regulations for the applicable funding program;
3. The grantee documents that the grantee has complied with all other requirements for pre-award costs under the regulations for the applicable funding program or as described below;
4. The activity for which costs will be incurred is included in a consolidated plan/action plan;
5. The grantee documents completion of its citizen participation process by including in its files a written, dated summary of citizen participation comments received on its plan, pursuant to 24 CFR 91.105(b)(5) or 91.115(b)(5) as applicable.

If the grantee’s files contain all other necessary documentation supporting the costs (described below for each program), the date of HUD approval for pre-award costs is the date of the written summary of citizen participation comments, or the grantee’s program year start date, whichever is later.

B. Additional Provisions: Entitlement CDBG Program

The Entitlement CDBG program regulations specify, at 24 CFR 570.200(h), the situations under which a grantee may incur costs prior to the effective date of its grant agreement. The provisions of this Notice will affect how grantees comply with the pre-award cost reimbursement requirements.

1. 24 CFR 570.200(h) defines the effective date of a grantee's agreement as the grantee's program year start date or the date that the consolidated plan/action plan is received by HUD (whichever is later). Under the provisions of this Notice, a grantee's action plan may not be submitted to (and thus received by) HUD until several months after the grantee's program year start date. This may negatively affect grantees' ability to incur pre-award costs.
2. Therefore, HUD has issued a waiver of 24 CFR 570.200(h) to the extent necessary to implement the following requirement: the effective date of a grantee's FY 2017 grant agreement will be considered to be the earlier of the grantee's program year start date or the date that the consolidated plan/action plan (with actual allocation amounts) is received by HUD. Attachment A contains the HUD memorandum authorizing this waiver. This waiver is applicable to any Entitlement CDBG grantee seeking to incur pre-award costs, whose action plan submission is delayed past the normal submission date because of delayed enactment of FY 2017 appropriations for the Department. An affected community applying this waiver shall document in writing the conditions giving rise to the need to use this waiver, and maintain the documentation for HUD's review. Grantees' authority to make use of this waiver is only in effect until August 16, 2017, as that is the last date that a grantee may submit its FY 2017 action plan.
3. 24 CFR 570.200(h)(1)(i) requires that the activity for which the costs are being incurred must be included in a consolidated plan/action plan prior to the costs being incurred; grantee compliance with steps 4 and 5 under the general pre-award cost provisions above will meet that requirement. However, grantees must also comply with §570.200(h)(1)(ii), which further specifies that the plan must advise citizens of the extent to which the pre-award costs will affect future grants. CDBG grantees intending to incur pre-award costs are cautioned that option b. described in Section IV above is not likely to be a feasible alternative for them. HUD advises any Entitlement CDBG grantee intending to incur pre-award costs to follow the process described in Section IV. a. above; in doing so, the grantee will need to ensure that it has met the citizen participation and notification requirements above.
4. Pursuant to § 570.200(h)(1)(iii) and § 570.604, the costs and corresponding activities must comply with the environmental review requirements at 24 CFR Part 58.

C. Additional Provisions: HOME Program

The HOME regulations specify situations under which a grantee may incur costs prior to the effective date of its grant agreement. The provisions of this Notice will affect how grantees comply with the pre-award cost reimbursement requirements.

1. 24 CFR 92.212(b) defines the effective date for incurring administrative and planning costs to be charged to the HOME allocation as the beginning of the participating jurisdiction's consolidated program year or the date that the consolidated plan is received by HUD (whichever is later). Under the provisions of this Notice, a participating jurisdiction's action plan may not be submitted to (and thus received by) HUD until several months after the PJ's program year start date. This may negatively affect a participating jurisdiction's ability to incur planning and administrative pre-award costs. Therefore, HUD has issued a waiver of 24 CFR 92.212(b) to the extent necessary to implement an alternative requirement: the effective date of a grantee's FY 2017 grant agreement will be considered to be the earlier of the participating jurisdiction's program year start date or the date that the consolidated plan/action plan (with actual allocation amounts) is received by HUD.
2. Attachment B contains the HUD memorandum authorizing this waiver. This waiver is applicable to any HOME participating jurisdiction seeking to incur pre-award administrative and planning costs, whose action plan submission is delayed past the normal submission date because of delayed enactment of FY 2017 appropriations for the Department. An affected participating jurisdiction applying this waiver shall document in writing the conditions giving rise to the need to use this waiver, and maintain the documentation for HUD's review. A participating jurisdiction's authority to make use of this waiver is only in effect until August 16, 2017, as that is the last date that a grantee may submit its FY 2017 action plan.
3. The HOME regulations already provide a participating jurisdiction with the authority to incur certain project costs. Eligible project costs may be incurred during the current program year in an amount not to exceed 25% of the current HOME allocation amount, to be charged after the award of the HOME allocation, provided the costs are in compliance with the requirements of the HOME Program. Before incurring the pre-award costs, the participating jurisdiction must comply with its citizen participation plan requirements.
4. 24 CFR 92.212(c) requires that the project costs that are being incurred must be included in a consolidated plan/action plan prior to the costs being incurred; compliance with steps 4 and 5 under the general pre-award cost provisions above will meet that requirement. These provisions must also be met if the participating jurisdiction elects to develop a mini-action plan pursuant to § 92.212(c).

D. Additional Provisions: ESG Program

An ESG grantee is permitted to incur pre-award costs against its FY 2017 grant, provided that the grantee has met the general conditions described above, plus the following conditions:

1. The costs and corresponding activities must comply with the Emergency Solutions Grants (ESG) Program regulations at 24 CFR Part 576.
2. The costs and corresponding activities must comply with environmental review requirements. The "Moving Ahead for Progress in the 21st Century Act" (MAP-21), (Public Law 112-141) made several changes to HUD's homeless assistance programs,

including authorization to permit recipients and other responsible entities to assume HUD environmental review responsibilities in accordance with 24 CFR Part 58. Initially, for FY 2012 ESG funds, ESG projects were subject to the environmental review procedures under 24 CFR Part 50, which assigns HUD all environmental review responsibilities due to the HEARTH Act's repeal of Section 443 of the McKinney-Vento Homeless Assistance Act. Now, recipients or other Responsible Entities assume environmental review responsibilities under 24 CFR Part 58.

E. Additional Provisions: HOPWA Program

A HOPWA grantee is permitted to incur pre-award costs against its FY 2017 grant, provided that the grantee has met the general conditions described above, plus the following conditions:

1. The costs are incurred for eligible activities undertaken in accordance with HOPWA program regulations at 24 CFR Part 574.
2. The costs and corresponding activities must comply with environmental review requirements at 24 CFR 574.510.

F. Additional Provisions: HTF Program

HUD is authorizing HTF grantees to incur pre-award costs permitted under 2 CFR 200.458 for planning activities and preparation of the HTF allocation plan. Eligible pre-award costs may include the cost of public hearings, consultations, and publication of public notices, as well as developing program guidelines. Pre-award costs may not exceed 5% of the minimum allocation amount of \$3 million. This is one half of the grant amount that the state may use for administration and planning in accordance with 24 CFR 93.202, based on receiving a minimum grant amount. The costs and corresponding activities must comply with the environmental review requirements at 24 CFR 93.301(f).

VI. Applicability of This Notice to Future Years

This Notice only applies to consolidated plans/action plans submitted for FY 2017 funding on or before August 16, 2017, or 60 days after HUD announcement of the FY 2017 allocation amounts for CDBG, ESG, HOME and HOPWA funding (whichever is earlier). HUD anticipates revising the Consolidated Plan regulations (and other related regulations) to explicitly include, as a basis for disapproval of a plan, that a plan does not contain and reflect a grantee's actual allocation amounts. For further information on potential rulemaking in this area, see HUD's June 3, 2015, Federal Register Notice (80 FR 31538). That document solicited public comments on possible amendments to the Consolidated Plan regulations and the CDBG Entitlement regulations to effect such a change. See in particular Sections II.B.1., II.B.2 and II.B.7 of the Notice, pages 31544 and 31546. (Please note, however, that the public comment period for that Federal Register Notice has closed.)

For further information:

Grantees with questions concerning this Notice should direct their inquiries to their local HUD Field Office Community Planning and Development Division. Field Offices should direct their questions to the following Headquarters program offices as applicable:

Office of Block Grant Assistance at (202) 708-1577 for the Entitlement CDBG program or (202) 708-1322 for the State CDBG program

Office of Affordable Housing Programs at (202) 708-2684

Office of Special Needs Assistance Programs at (202) 708-4300

Office of HIV/AIDS Housing at (202) 708-1934 or at hopwa@hud.gov

ATTACHMENT A




U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-7000

OFFICE OF THE ASSISTANT SECRETARY FOR
COMMUNITY PLANNING AND DEVELOPMENT

OCT 14 2016

MEMORANDUM FOR: All Community Planning and Development Field Office Division
Directors

FROM: Harriet Tregoning, Principal Deputy Assistant Secretary for
Community Planning and Development, D 

SUBJECT: Waiver of 24 CFR 570.200(h) regarding FY 2017 Action Plans
Community Development Block Grant (CDBG) Program

HUD is issuing revised procedures to govern the submission and review of action plans for FY 2017 funding prior to the enactment of a FY 2017 appropriation bill. Any grantee with a program year start date prior to, or up to 60 days after, HUD's announcement of the FY 2017 formula program funding allocations is advised not to submit its consolidated plan or action plan until the FY 2017 formula allocations have been announced. However, an action plan must be submitted to HUD no later than August 16, 2017.

The likelihood of delays in the receipt of annual appropriations by HUD and implementation of this policy for FY 2017 may have negative consequences for CDBG grantees that intend to incur eligible costs prior to the award of FY 2017 funding. Some activities might otherwise be interrupted while implementing these revised procedures. In addition, grantees might not otherwise be able to use CDBG funds for planning and administrative costs of administering their programs. In order to address communities' needs and to ensure that programs can continue without disturbance, I find that good cause exists pursuant to 24 CFR 5.110 to waive the provisions of 24 CFR 570.200(h) for the Entitlement CDBG program, the Insular Areas CDBG program, and for grants to non-entitlement counties in Hawaii. 24 CFR 570.200(h) is waived to the extent necessary to treat the effective date of the grant agreement as the program year start date or the date that the consolidated plan/action plan (with actual allocation amounts) is received by HUD, whichever comes first.

This waiver will apply to any Entitlement, Insular or Hawaii non-entitlement CDBG grantees whose program year start date for FY 2017 funding occurs during the period starting October 1, 2016, and ending August 16, 2017 or 60 days after HUD's announcement of FY 2017 allocation amounts for formula program funding (whichever comes first). The waiver is available for use by any applicable CDBG grantee whose action plan submission is delayed past the normal submission date because of delayed enactment of FY 2017 appropriations for the Department. Any affected grantee taking advantage of this waiver shall document in writing the conditions giving rise to the need to utilize this waiver, and shall maintain such documentation for HUD's review. This waiver authority is only in effect until August 16, 2017.

ATTACHMENT B




U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-7000

OFFICE OF THE ASSISTANT SECRETARY FOR
COMMUNITY PLANNING AND DEVELOPMENT

OCT 14 2016

MEMORANDUM FOR: All Community Planning and Development Field Office Division
Directors

FROM: Harriet Tregoning, Principal Deputy Assistant Secretary for
Community Planning and Development, D 

SUBJECT: Waiver of 24 CFR 92.212(b) regarding FY 2017 Action Plans
HOME Investment Partnership Program (HOME) Program

HUD is issuing revised procedures to govern the submission and review of action plans for FY 2017 funding prior to the enactment of a FY 2017 appropriation bill. Any participating jurisdiction with a program year start date prior to, or up to 60 days after, HUD's announcement of the FY 2017 funding allocations is advised not to submit its consolidated plan or action plan until the FY 2017 allocations have been announced. However, an action plan must be submitted to HUD no later than August 16, 2017.

The likelihood of delays in the receipt of annual appropriations by HUD and implementation of this policy for FY 2017 may have negative consequences for HOME participating jurisdictions that intend to incur eligible costs prior to the award of FY 2017 funding. Some activities might otherwise be interrupted while implementing these revised procedures. In addition, participating jurisdictions might not otherwise be able to use HOME funds for planning and administrative costs of administering their programs. In order to address communities' needs and to ensure that programs can continue without disturbance, I find that good cause exists pursuant to 24 CFR 5.110 to waive the provisions of 24 CFR 92.212(b) for the HOME Program. 24 CFR 92.212 (b) is waived to the extent necessary to treat the effective date of the grant agreement as the program year start date or the date that the consolidated plan/action plan (with actual allocation amounts) is received by HUD, whichever comes first.

This waiver will apply to any HOME participating jurisdiction whose program year start date for FY 2017 funding occurs during the period starting October 1, 2016, and ending August 16, 2017 or 60 days after HUD's announcement of FY 2017 allocation amounts for program funding (whichever comes first). The waiver is available for use by any applicable HOME participating jurisdiction whose action plan submission is delayed past the normal submission date because of delayed enactment of FY 2017 appropriations for the Department. Any affected participating jurisdiction taking advantage of this waiver shall document in writing the conditions giving rise to the need to utilize this waiver, and shall maintain such documentation for HUD's review. This waiver authority is only in effect until August 16, 2017.

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EXHIBIT 2

HUD NOTIFICATION OF APPROVAL TO CHANGE CONSOLIDATED PLAN PROGRAM YEAR



U. S. Department of Housing and Urban Development

Knoxville Field Office, Region IV
John J. Duncan Federal Building
710 Locust Street, Suite 300
Knoxville, Tennessee 37902-2526

December 21, 2016

James Harbison, Executive Director
Metropolitan Development and Housing Agency
701 South Sixth Street
Nashville, Tennessee 37206

Dear Mr. Harbison:

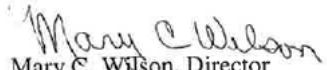
SUBJECT: Consolidated Plan - Request to Change Program Year

This letter is in response to the December 2, 2016, letter regarding the above subject matter. In the letter, the Metropolitan Development and Housing Agency (MDHA), as the lead agency of Nashville - Davidson County Consolidated Planning programs, has requested to change the beginning date for Program Year 2017 to June 1, 2017 and all subsequent program years to June 1. This of course, also includes a request to extend the Program Year 2016 to May 31, 2017.

This Office has reviewed the justification provided to support the request and the request has been approved. We acknowledge, as noted in your letter, that the finalization of annual formula allocation amounts has usually occurred in the spring of each year, which has adversely affected grantees that begin their program years during that time. Also, the program year change should allow your staff more time in completing the Assessment of Fair Housing.

If you have any questions, please contact Lynn Holt, Senior Community Planning and Development Representative, at (865) 474-8222.

Very sincerely yours,


Mary C. Wilson, Director
Office of Community Planning
and Development

cc:

Honorable Megan Barry, Mayor
Metropolitan Government of Nashville – Davidson County
Angela Hubbard, Assistant Director of Community Development

EXHIBIT 3

HUD NOTIFICATION of 2017 ALLOCATIONS

The following was published on the HUD.gov website on June 14, 2017.

The Fiscal Year (FY) 2017 budget for the Department of Housing and Urban Development has been enacted. These spreadsheets provide full-year allocations for the Office of Community Planning and Development's (CPD) formula programs: Community Development Block Grants (CDBG); HOME Investment Partnerships (HOME), Housing Opportunities for Persons with AIDS (HOPWA); and Emergency Solutions Grants (ESG).

The allocations reflect the level of funding approved for these programs in your community. The amounts also reflect approved grant reductions and include any reallocated funds for the CDBG and HOME programs. Under the CDBG program, some metropolitan cities have a **joint grant agreement** with an urban county to administer their CDBG grant. The urban county amounts shown in this table do not include the funds allocated to any metropolitan city. The metropolitan city and urban county amounts are shown separately.

TN-FY17 ALLOCATIONS							
KEY	CNSRTKEY	NAME	STA	CDBG17	HOME17	HOPWA17	ESG17
471368		Nashville-Davidson	TN	\$4,637,909	\$1,881,838	\$1,073,473	\$410,455

EXHIBIT 4

GEOGRAPHIC PRIORITIES/PLACE-BASED CENSUS TRACTS

- Qualification as a Tier 1 Area: At least 65% of households in the census tract have incomes at or below 80% of the area median income for Nashville-Davidson County or are part of a Tier 2 Priority Area.
- List of Tier 1 Census Tracts: The following are Tier 1 census tracts. See the directions provided in **EXHIBIT 5** to determine the census tract number for a specific piece of property.

010402	010702	010903	011001	011300	011400	011800	011900
012600	012701	013202	013300	013601	013602	013700	013800
013900	014200	014300	014400	014800	015615	015628	015802
015803	015804	015900	016000	016100	016200	016300	016600
017401	017500	018101	018904	019003	019004	019005	019006
019118	019300	019400					

- List of Tier 2 North Nashville Census Tracts

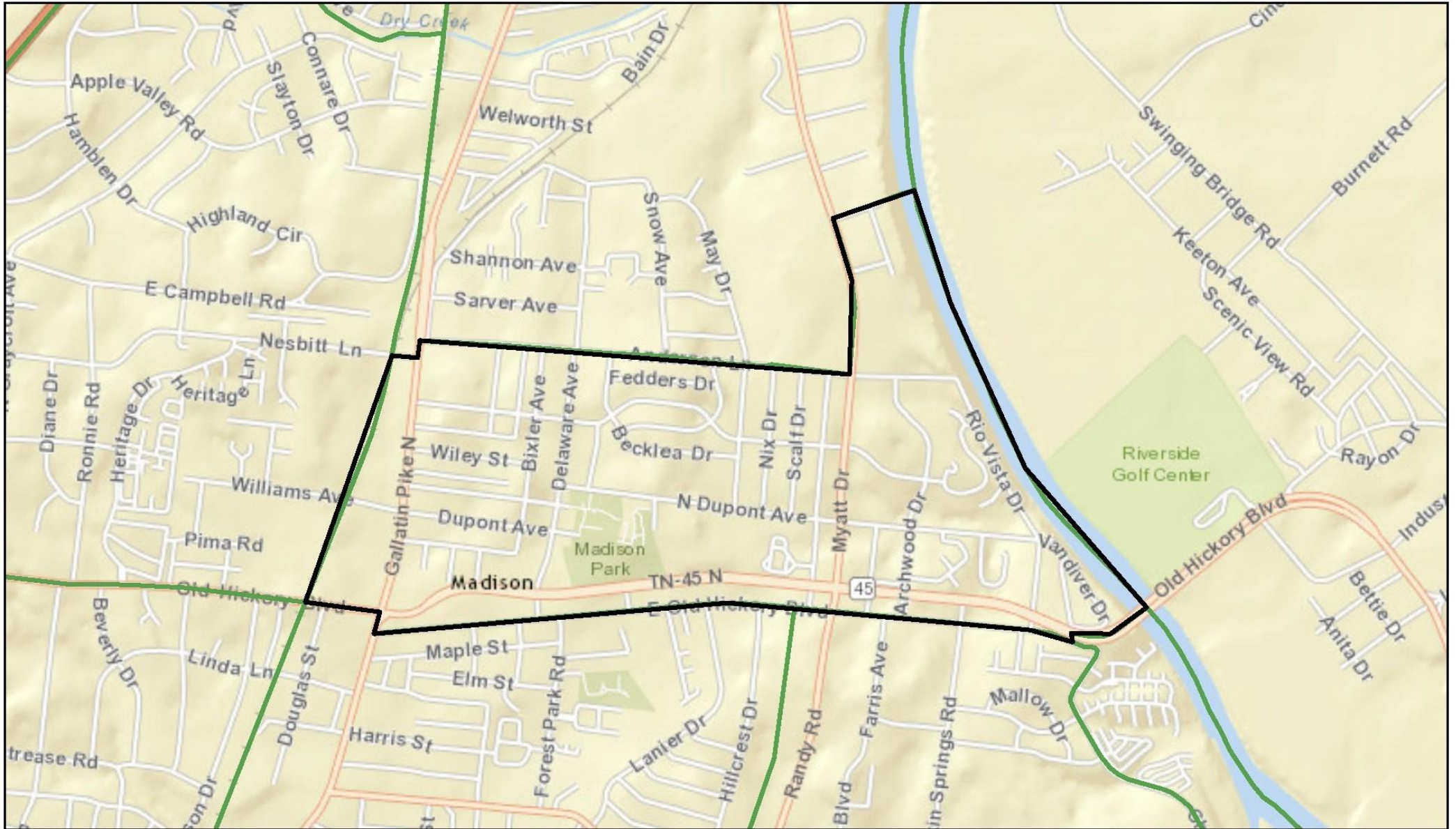
013601	013602	013700	013800	013900	014200	014300	019400
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- List of Tier 2 Public Housing Census Tracts

010402	011800	011900	013601	013602	013700	014200
014400	014800	016100	016200	016300	016600	019300
019400						

- Map of Tier 1 Census Tracts: A map of all Tier 1 census tracts is provided on the following page. Maps for each census tract listed in the tables above are provided on subsequent pages in numerical order.
- Additional Census Tract Information: A step-by-step guide for obtaining low-moderate income (LMI) census tract information follows the map section. Please note the following:
 - Census tract information is not available through this application for tracts that are not LMI.
 - Although a census tract may be identified as LMI, it is eligible for Tier 1 programs **only** if it meets the qualification stated above and **specifically listed** as a Tier 1 Area and is eligible as a Tier 2 Area only if it is **specifically listed** above.

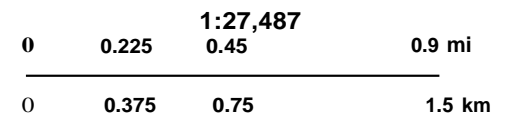
CPO Maps - Census Tract 010402



April 9, 2015

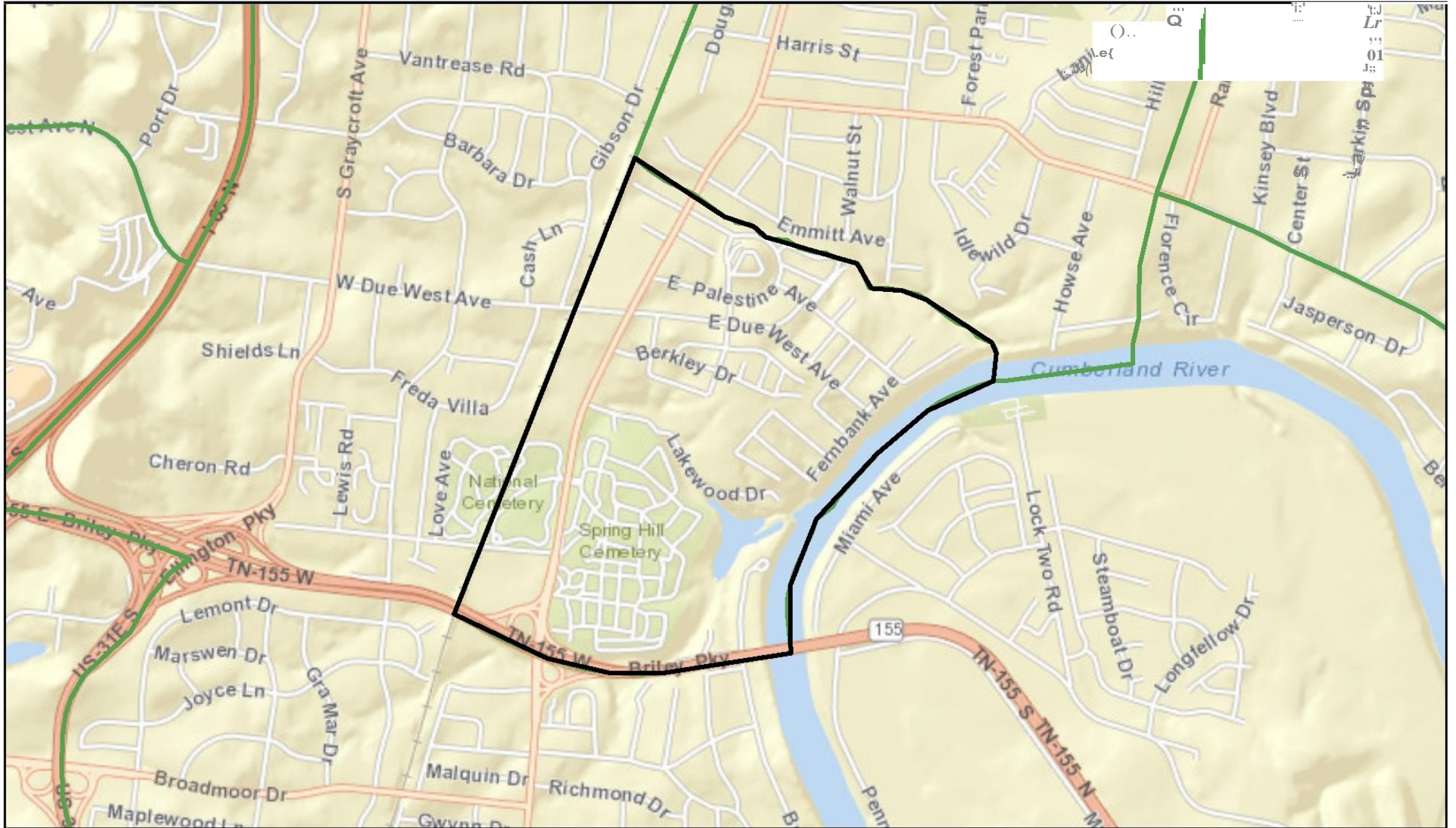
Override 1

Low Mod Tract



Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTom, MapmyIndia, © OpenstreetMap contributors, and the GIS User Community

CPO Maps - Census Tract 010702



April 6, 2015

Override 1

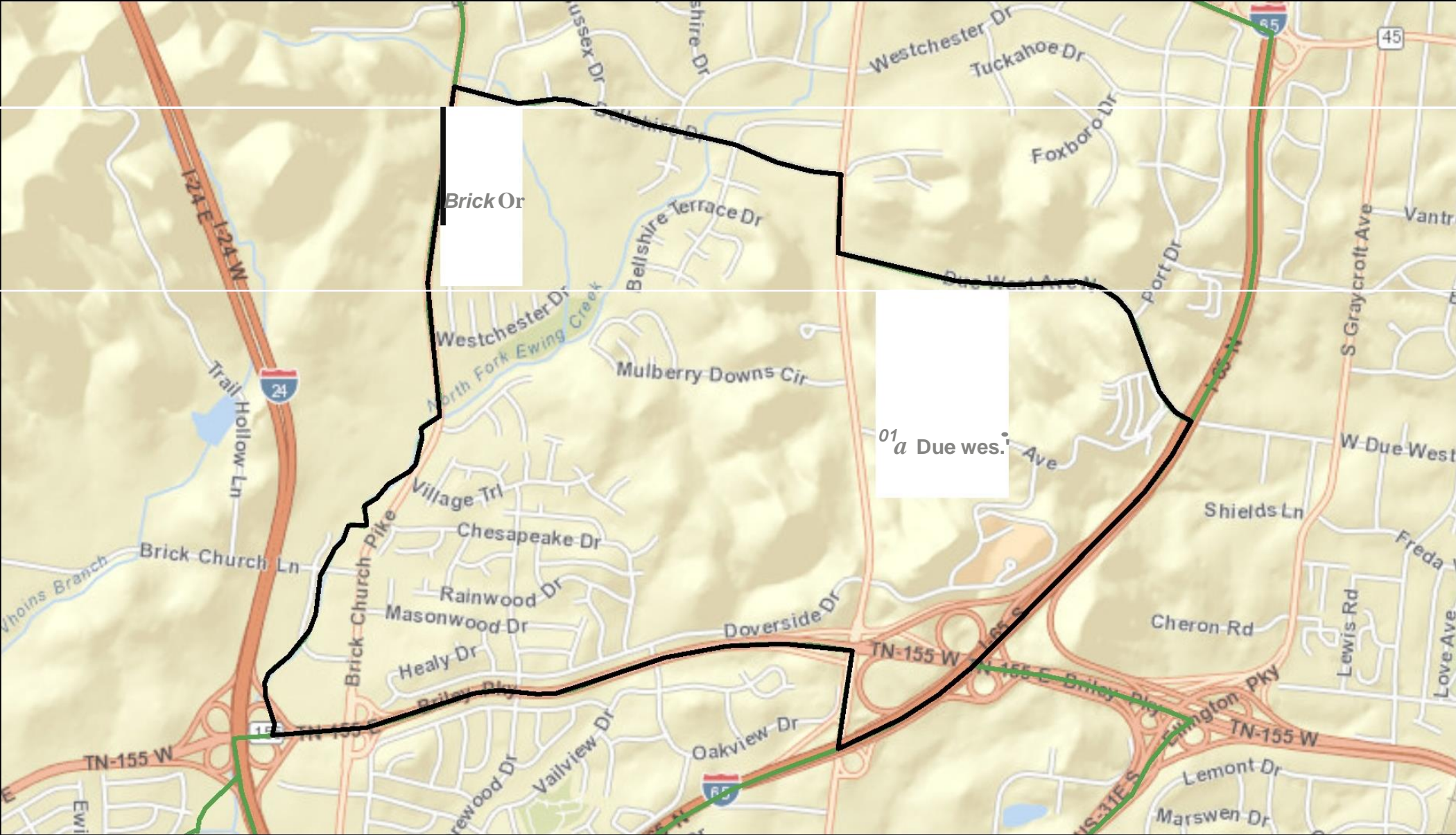
Low Mod Tract

0 0.225 0.45 0.9 mi

0 0.375 0.75 1.5 km

Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTom, MapmyIndia, © OpenstreetMap contributors, and the GIS User Community

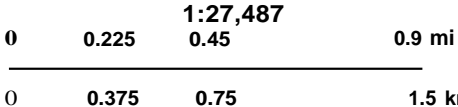
CPO Maps - Census Tract 010903



April 6, 2015

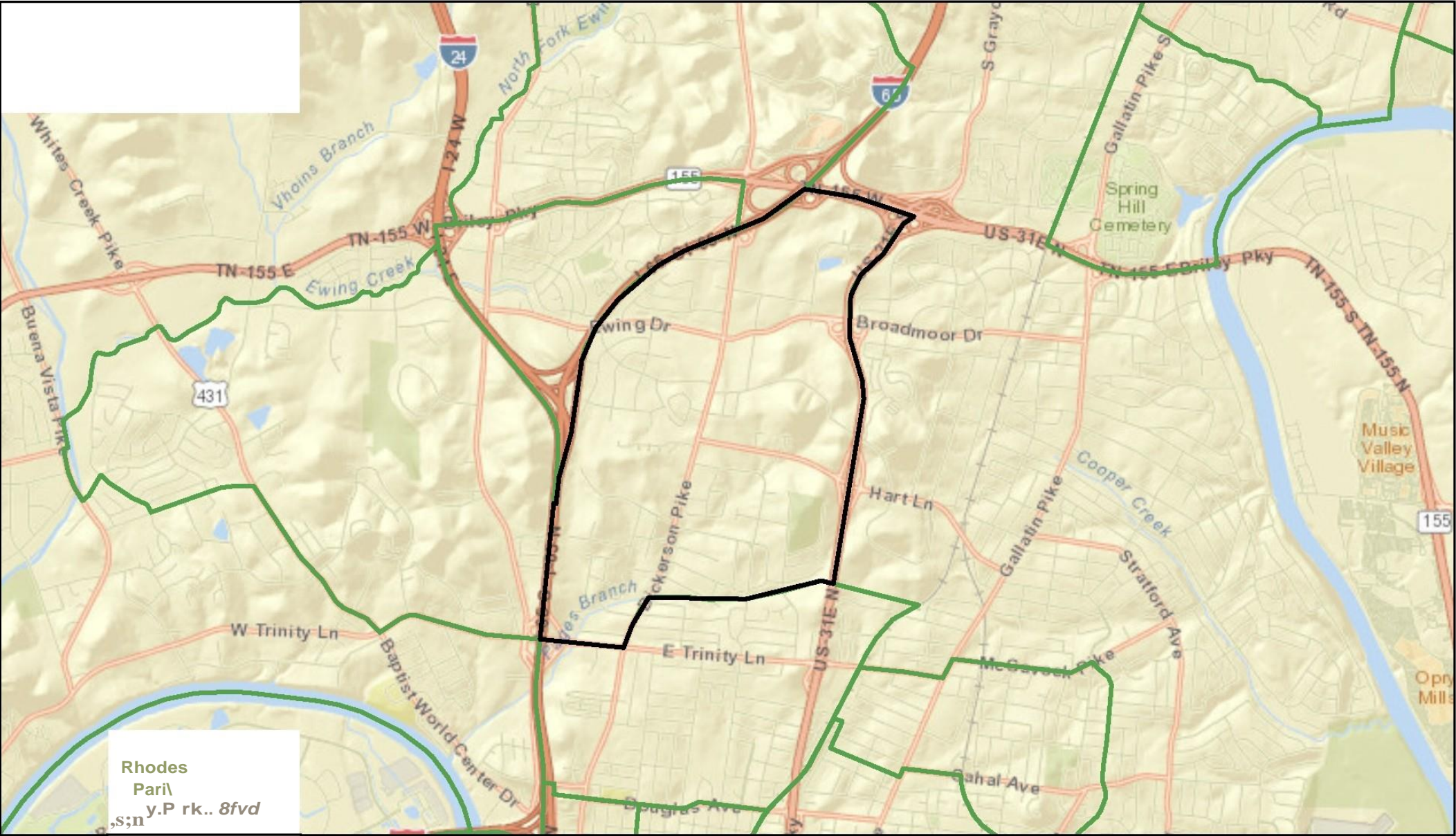
Override 1

Low Mod Tract



Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTom, MapmyIndia, © OpenstreetMap contributors, and the GIS User Community

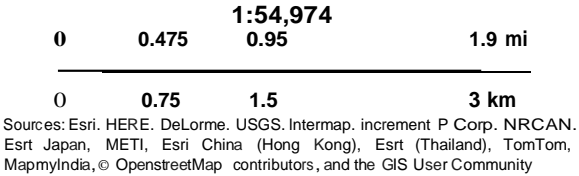
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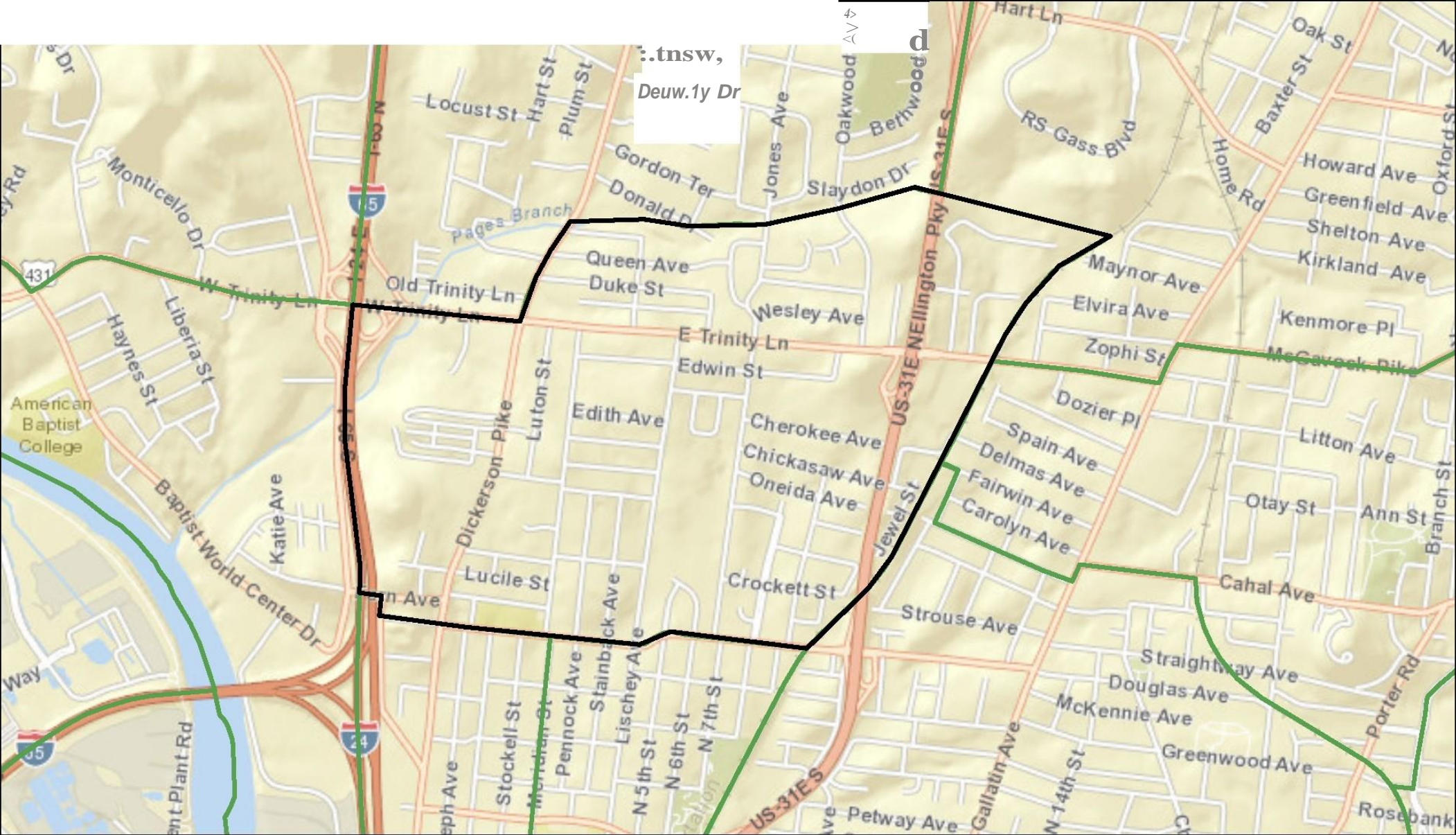
April 6, 2015

Override 1

Low Mod Tract



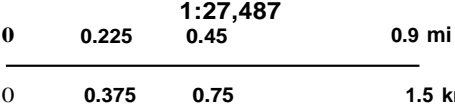
CPO Maps- Census Tract 011300



April 6, 2015

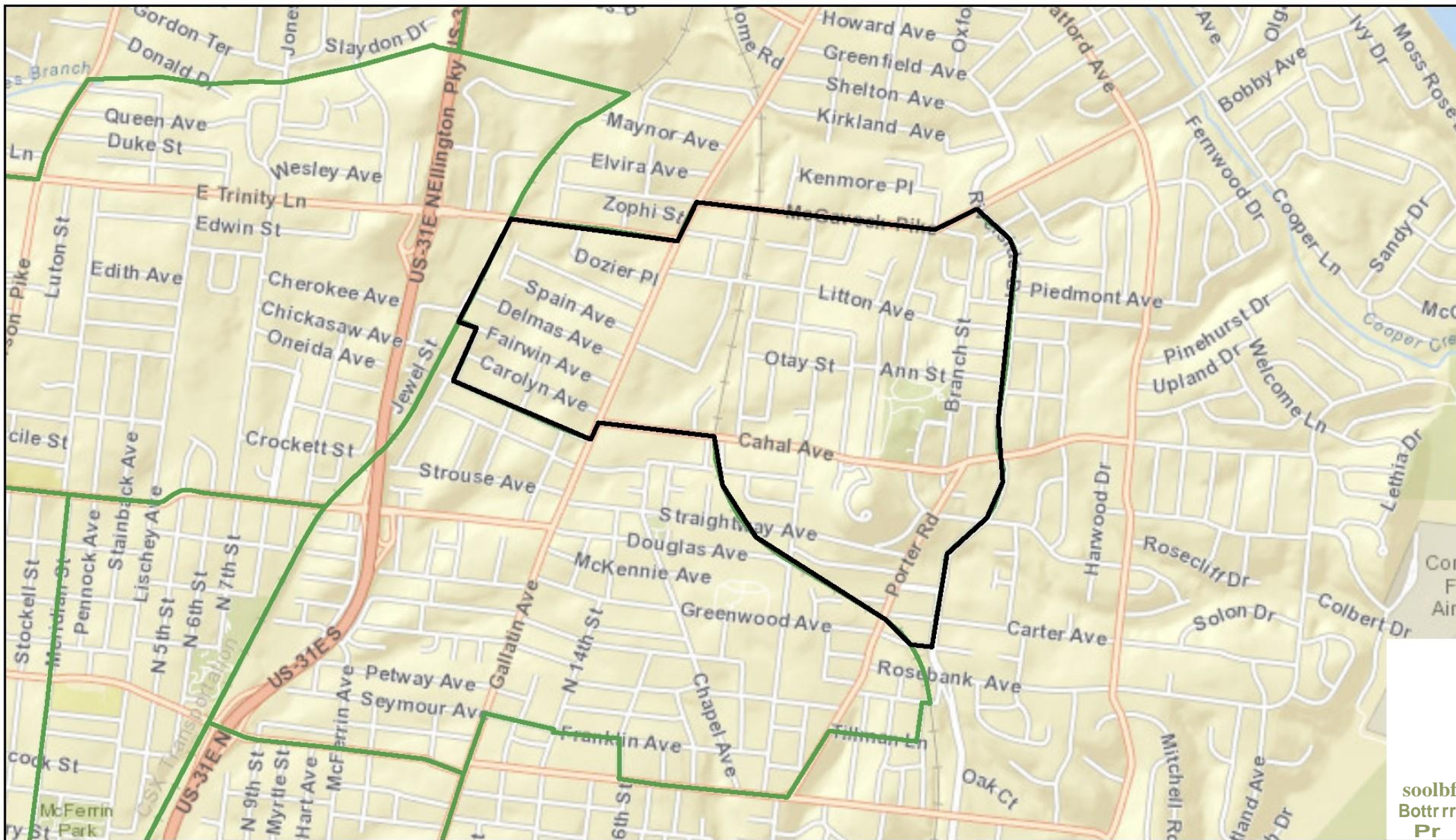
Override 1

Low Mod Tract



Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTom, MapnyIndia, © OpenstreetMap contributors, and the GIS User Community

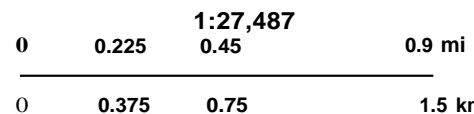
CPO Maps- Census Tract 011400



April 6, 2015

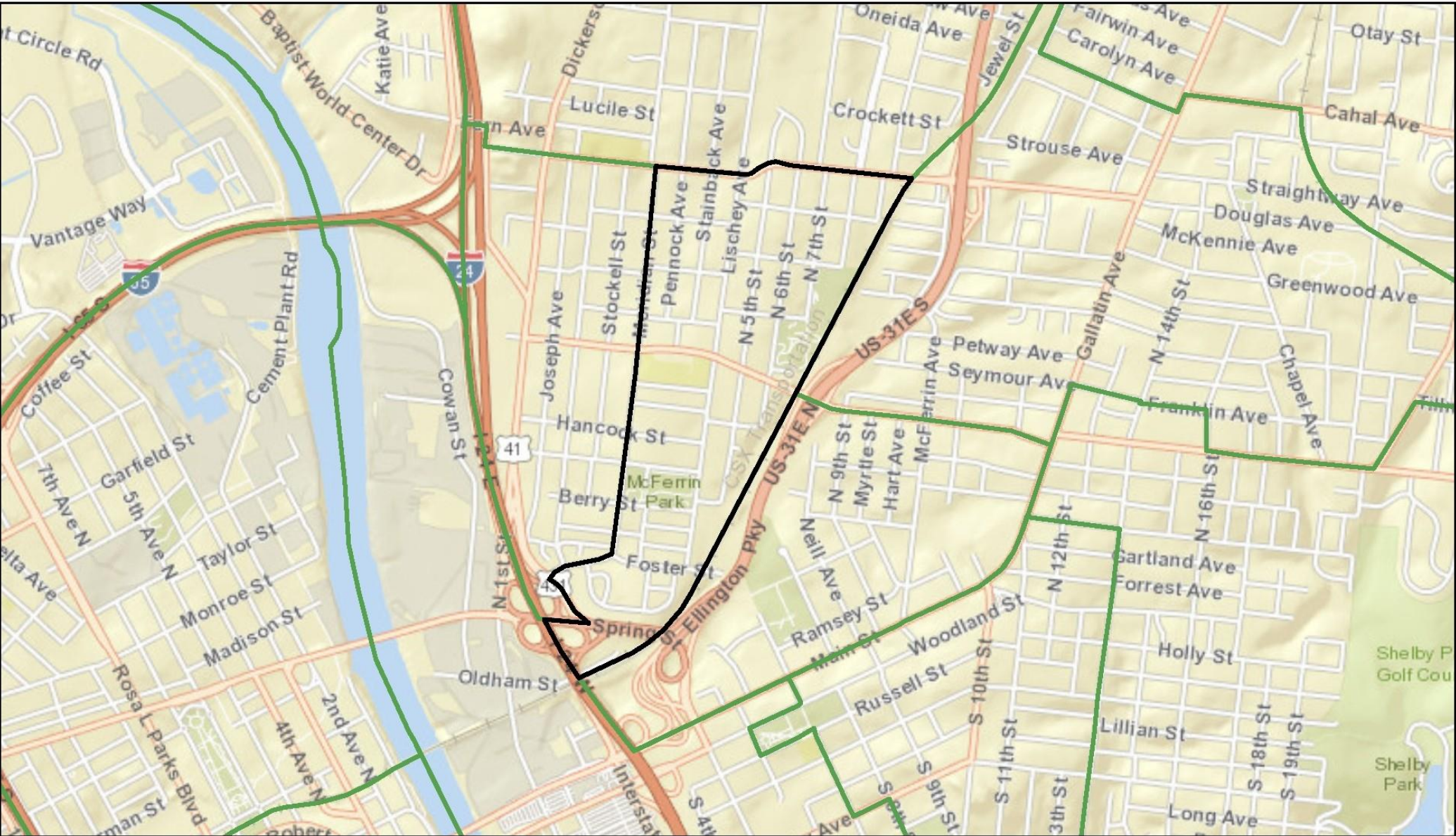
Override 1

Low Mod Tract



Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTom, MapmyIndia, © OpenstreetMap contributors, and the GIS User Community

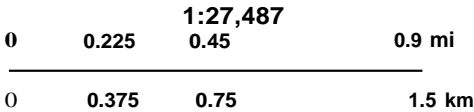
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April 6, 2015

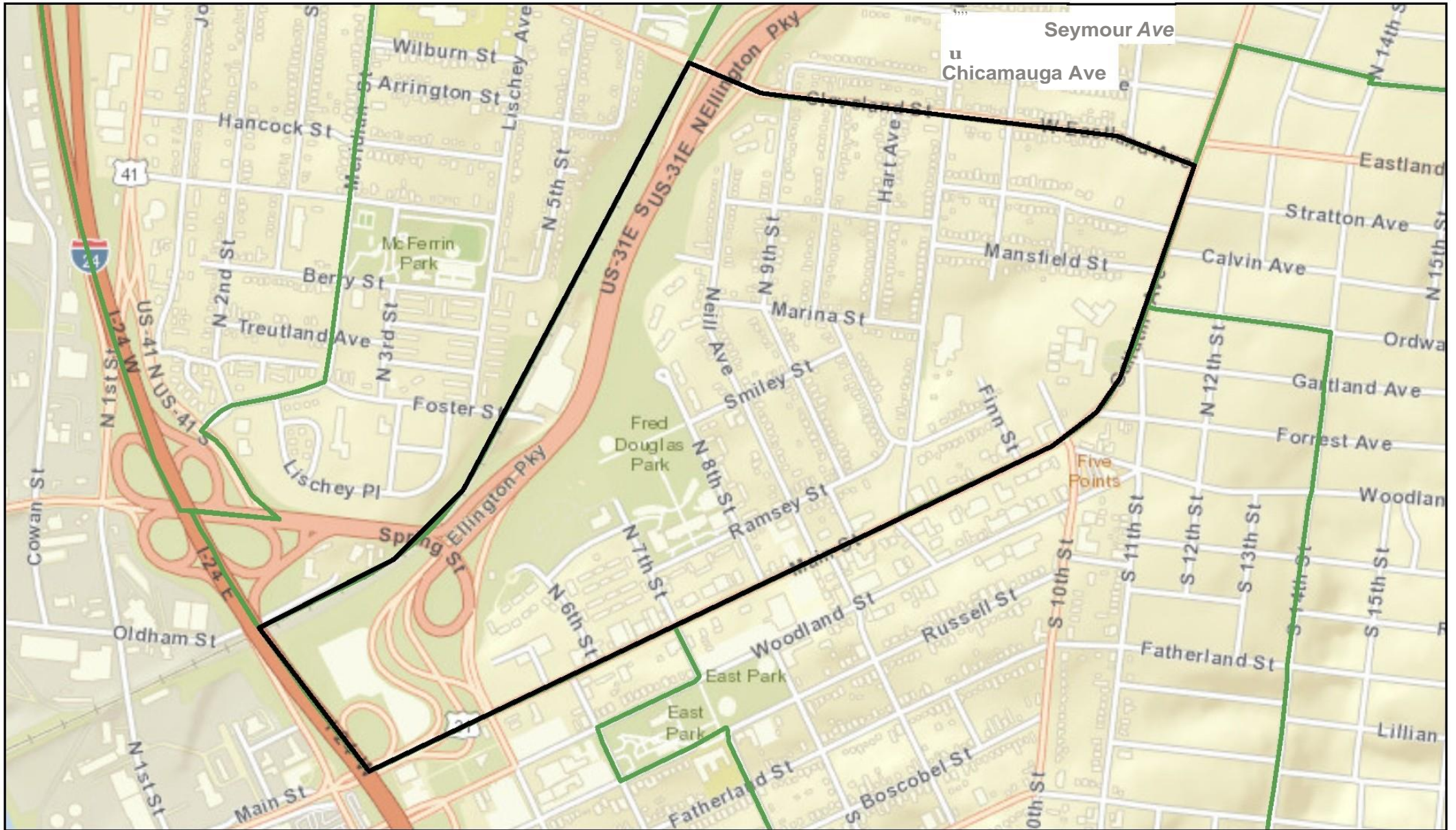
Override 1

Low Mod Tract



Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTom, MapmyIndia, © OpenstreetMap contributors, and the GIS User Community

CPO Maps- Census Tract 011900



April 6, 2015

Override 1

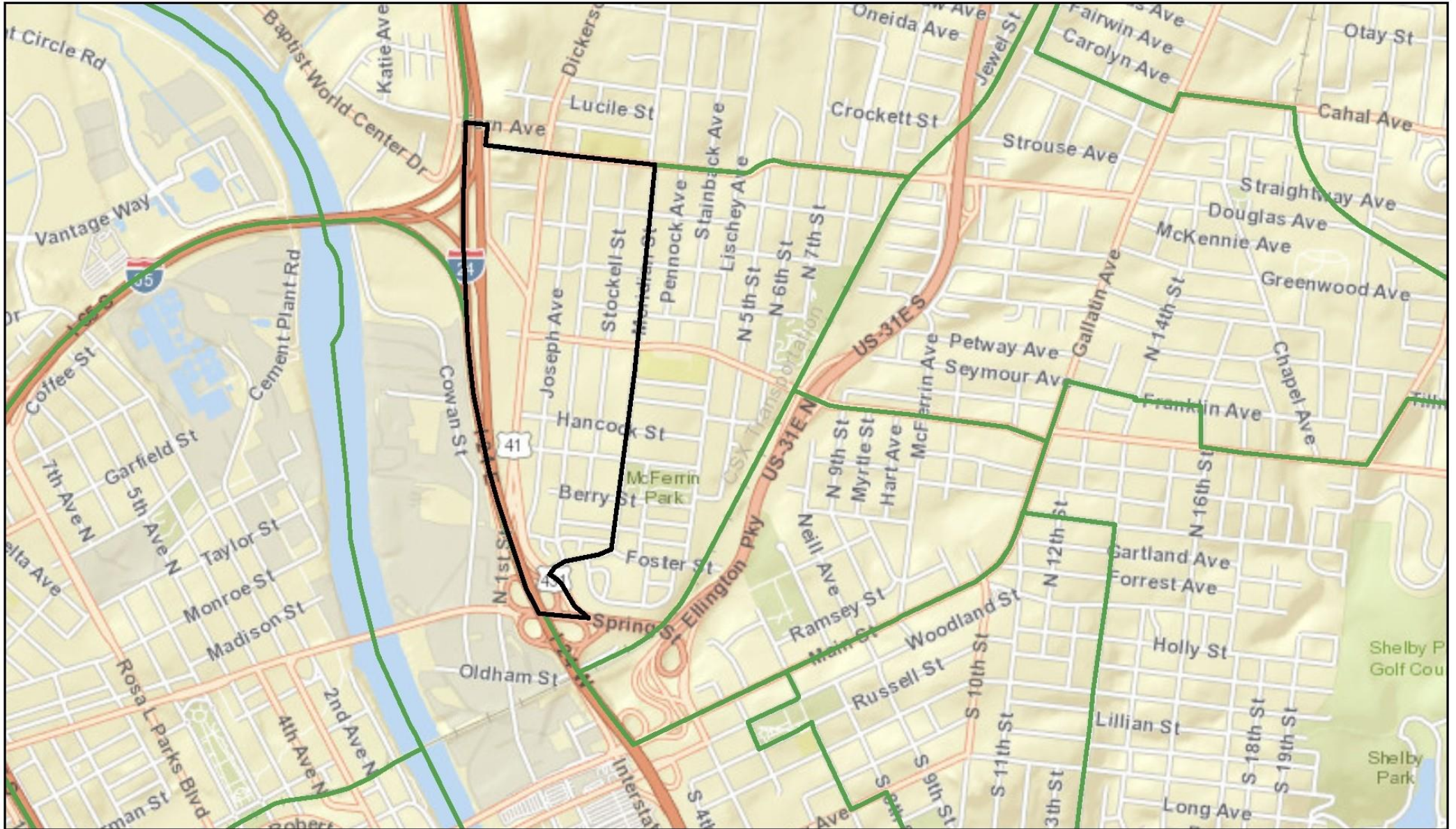
Low Mod Tract

0 0.1 0.2 0.4 mi

0 0.175 0.35 0.7 km

Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTom, MapmyIndia, © OpenstreetMap contributors, and the GIS User Community

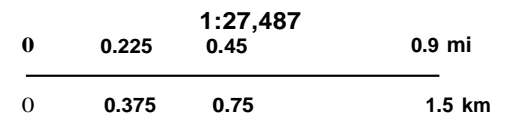
CPO Maps- Census Tract 012600



April 6, 2015

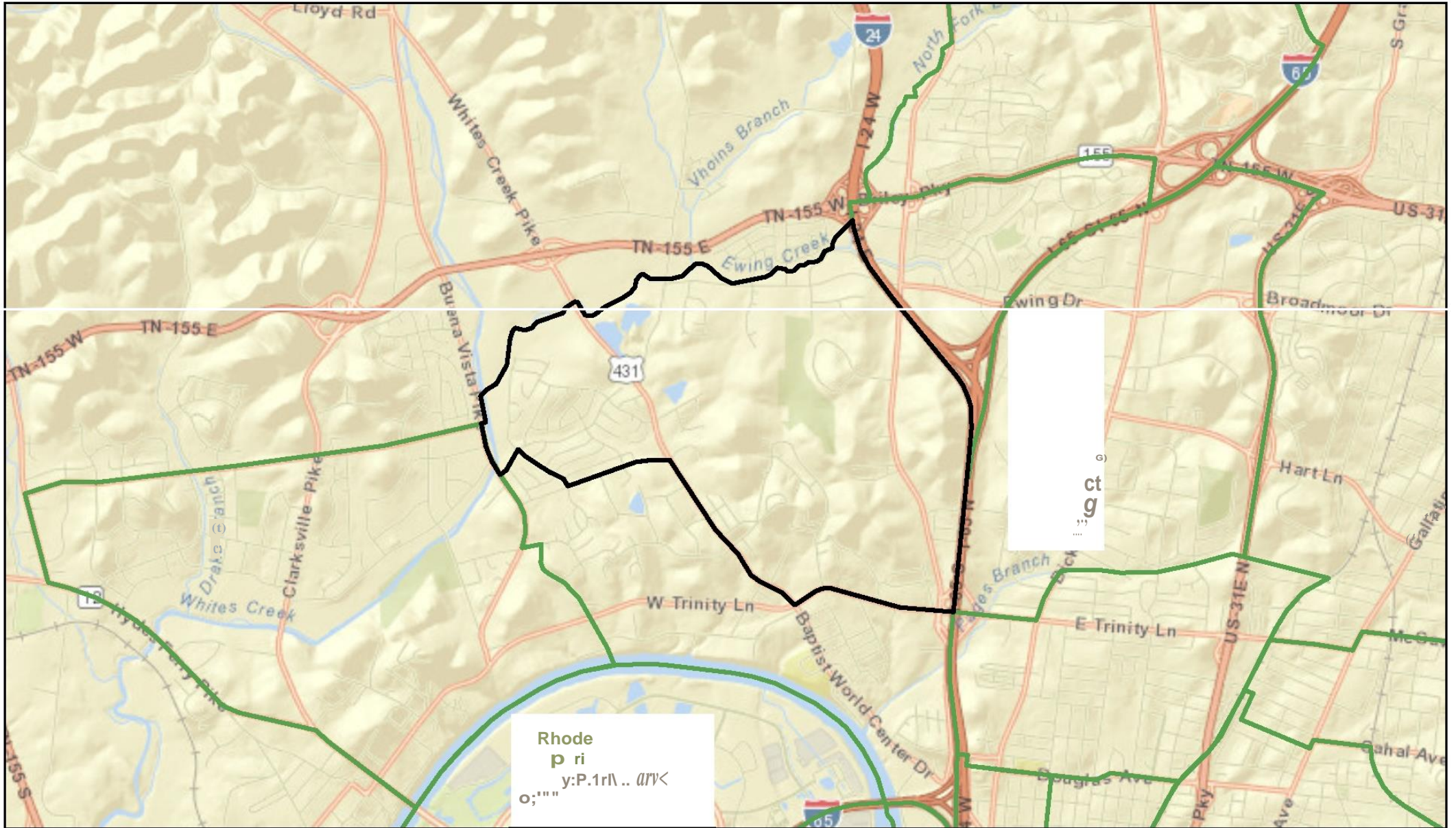
Override 1

Low Mod Tract



Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTom, MapmyIndia, © OpenstreetMap contributors, and the GIS User Community

CPO Maps- Census Tract 012701



April 6, 2015

Override 1

Low Mod Tract

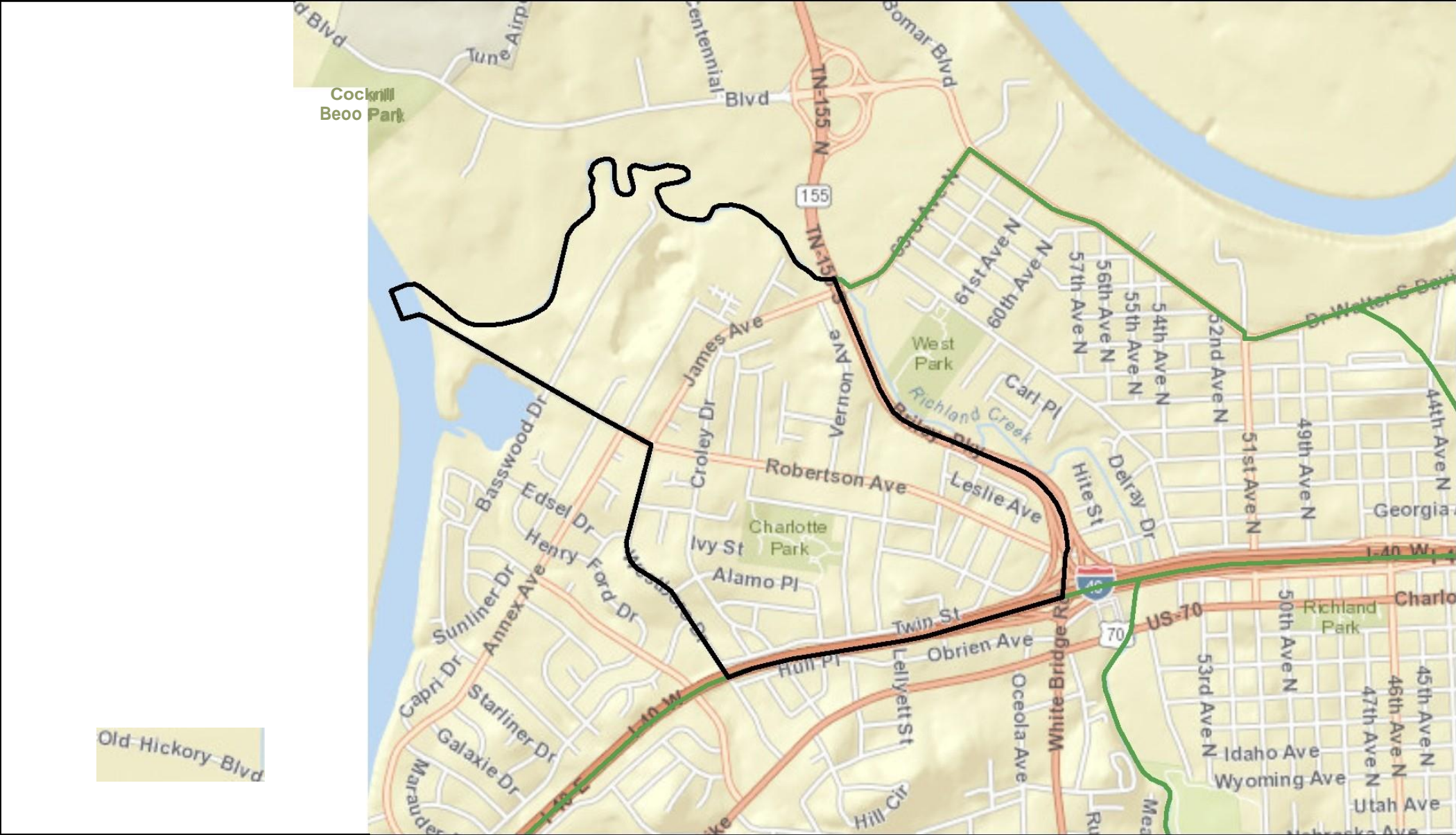
Rhode
p ri
y:P.1r\.. arv<
o;"'"

0 0.475 1.54,974 1.9 mi

0 0.75 1.5 3 km

Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRCAN, Esrt Japan, METI, Esri China (Hong Kong), Esrt (Thailand), TomTom, MapnyIndia, © OpenstreetMap contributors, and the GIS User Community

CPO Maps - Census Tract 013202



April 6, 2015

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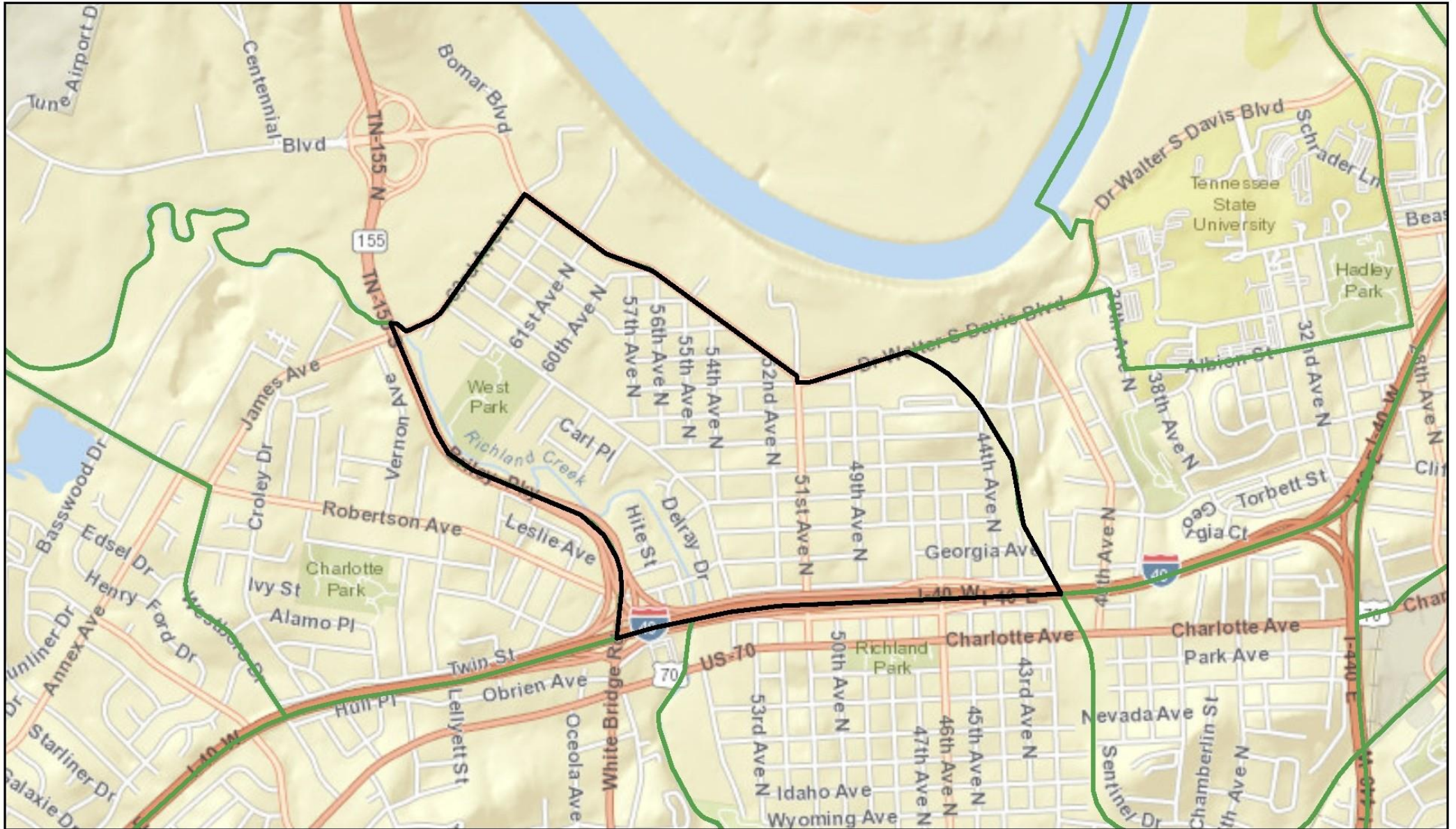
Low Mod Tract

0 0.225 0.45 0.9 mi

0 0.375 0.75 1.5 km

Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTom, MapmyIndia, © OpenstreetMap contributors, and the GIS User Community

CPO Maps - Census Tract 013300



April 6, 2015

Override 1

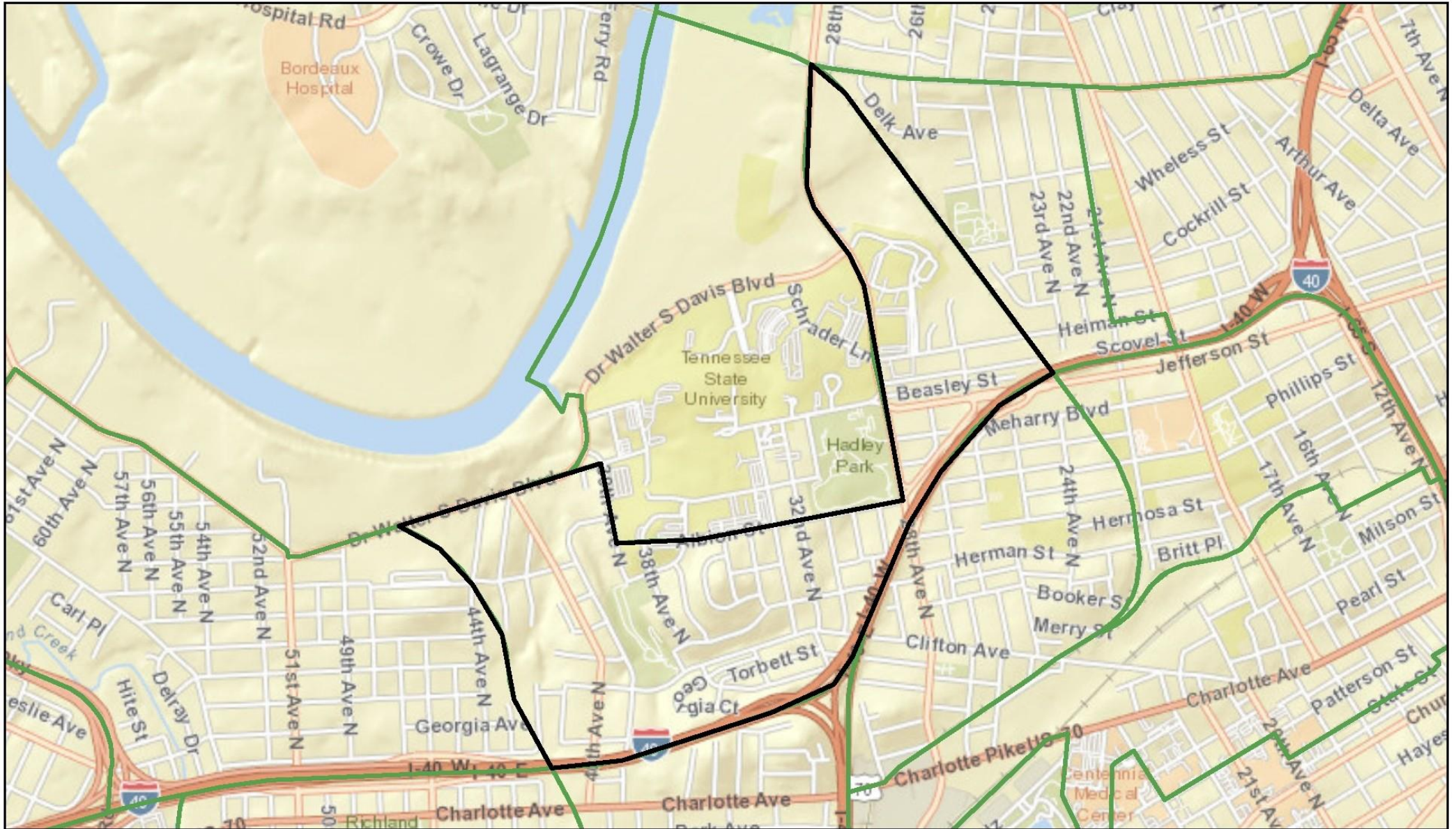
Low Mod Tract

0 0.225 0.45 0.9 mi

0 0.375 0.75 1.5 km

Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTom, MapmyIndia, © OpenstreetMap contributors, and the GIS User Community

CPO Maps- Census Tract 013601



April 6, 2015

Override 1

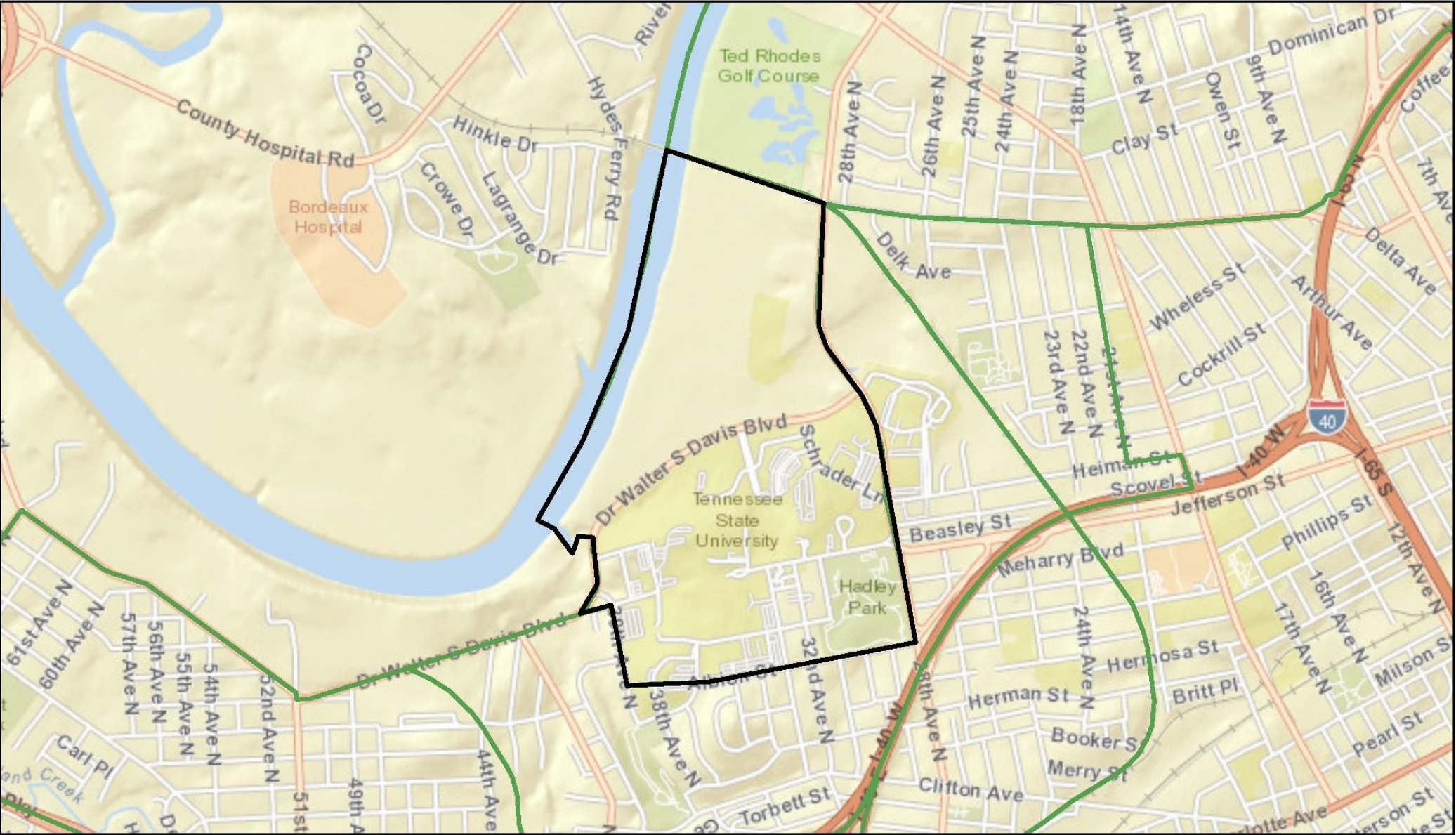
Low Mod Tract

0 0.225 0.45 0.9 mi

0 0.375 0.75 1.5 km

Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTom, MapmyIndia, © OpenStreetMap contributors, and the GIS User Community

CPO Maps - Census Tract 013602



April 6, 2015

Override 1

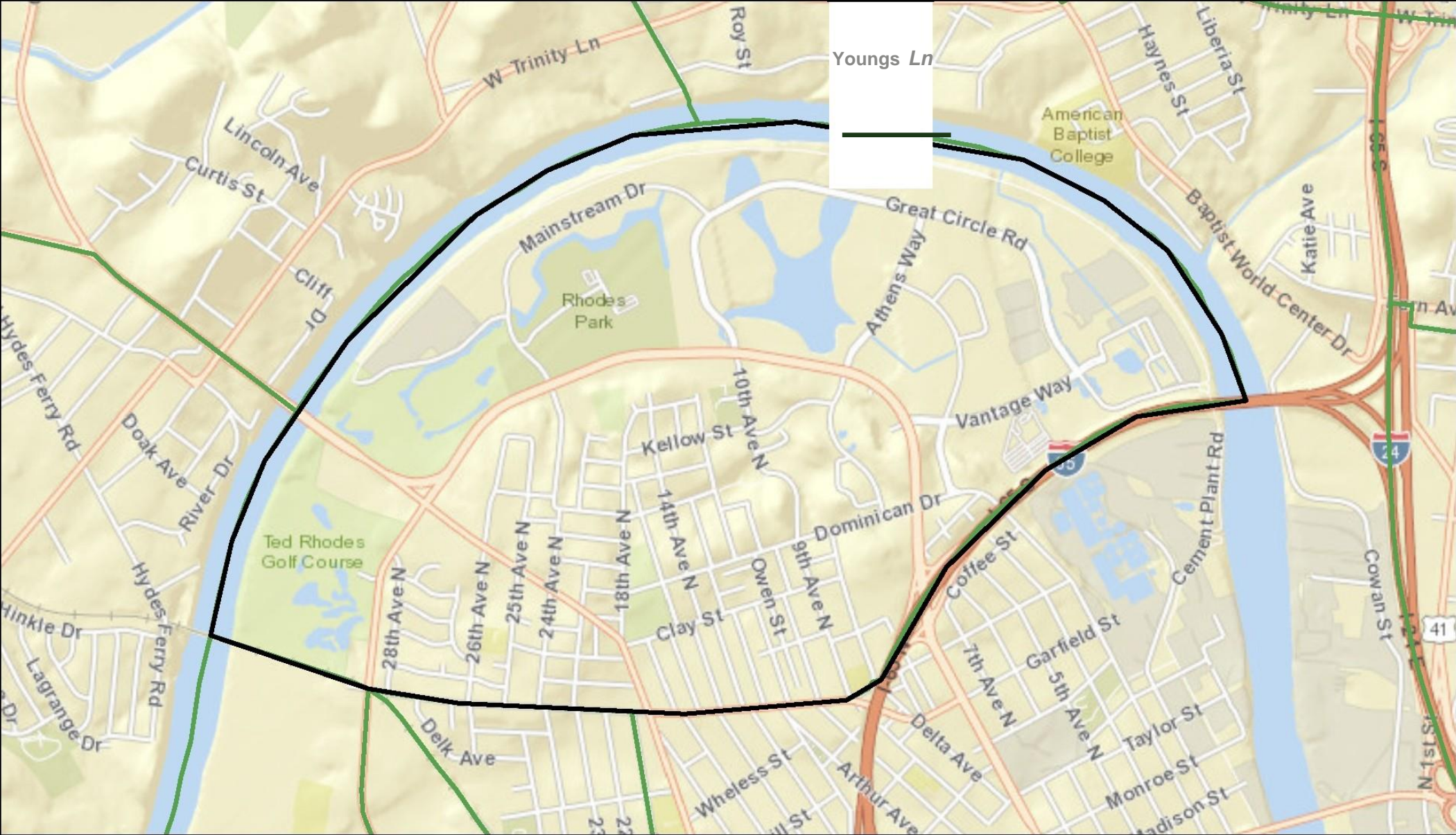
Low Mod Tract

0 0.225 0.45 0.9 mi

0 0.375 0.75 1.5 km

Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTom, MapmyIndia, © OpenstreetMap contributors, and the GIS User Community

CPO Maps - Census Tract 013700



April 6, 2015

Override 1

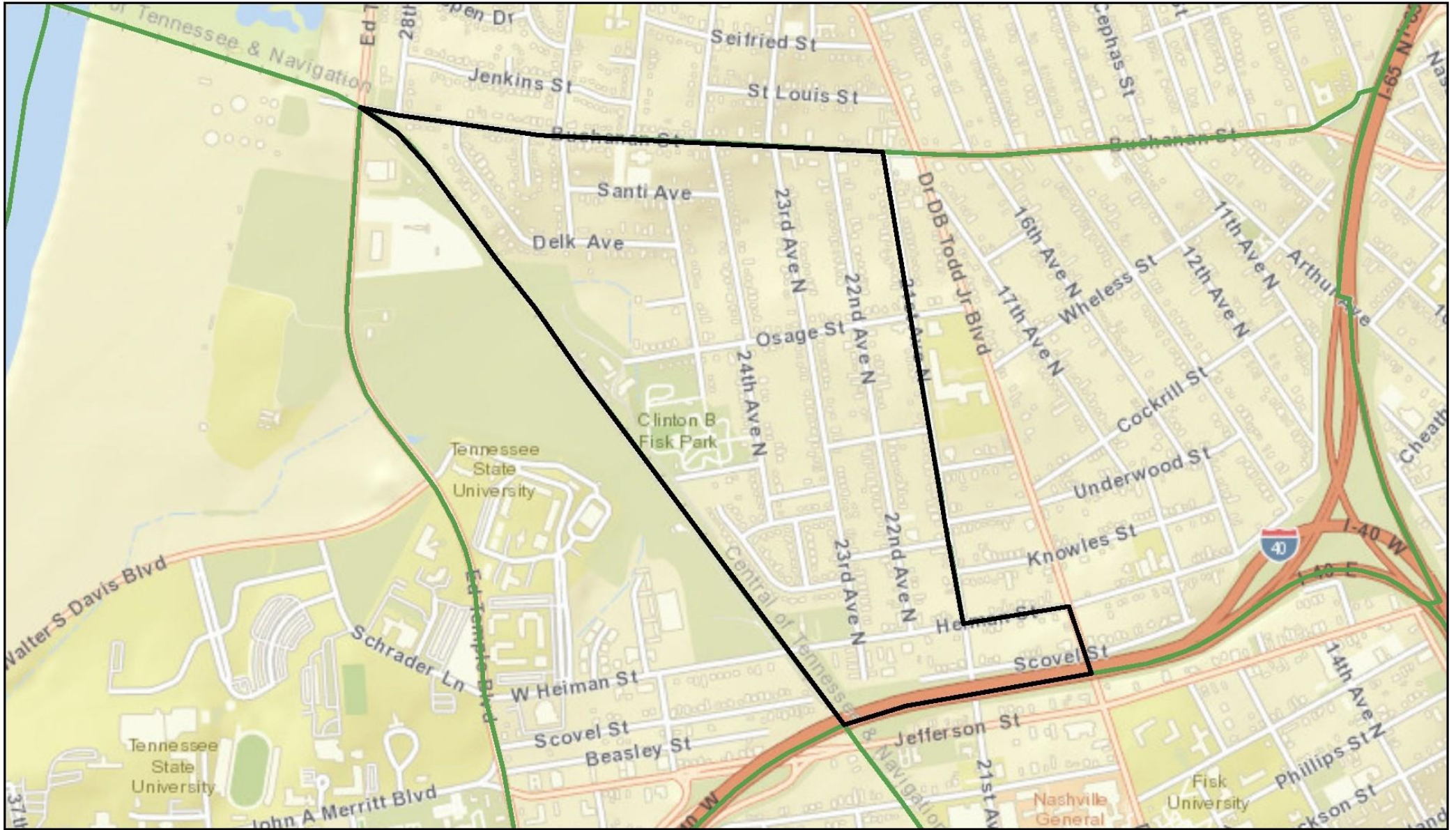
Low Mod Tract

0 0.225 0.45 0.9 mi

0 0.375 0.75 1.5 km

Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTom, MapmyIndia, © OpenstreetMap contributors, and the GIS User Community

CPO Maps - Census Tract 013800



April 6, 2015

Override 1

Low Mod Tract

0 0.1 0.2 0.4 mi

0 0.175 0.35 0.7 km

Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTom, MapmyIndia, © OpenstreetMap contributors, and the GIS User Community

CPO Maps - Census Tract 013900



April 6, 2015

Override 1

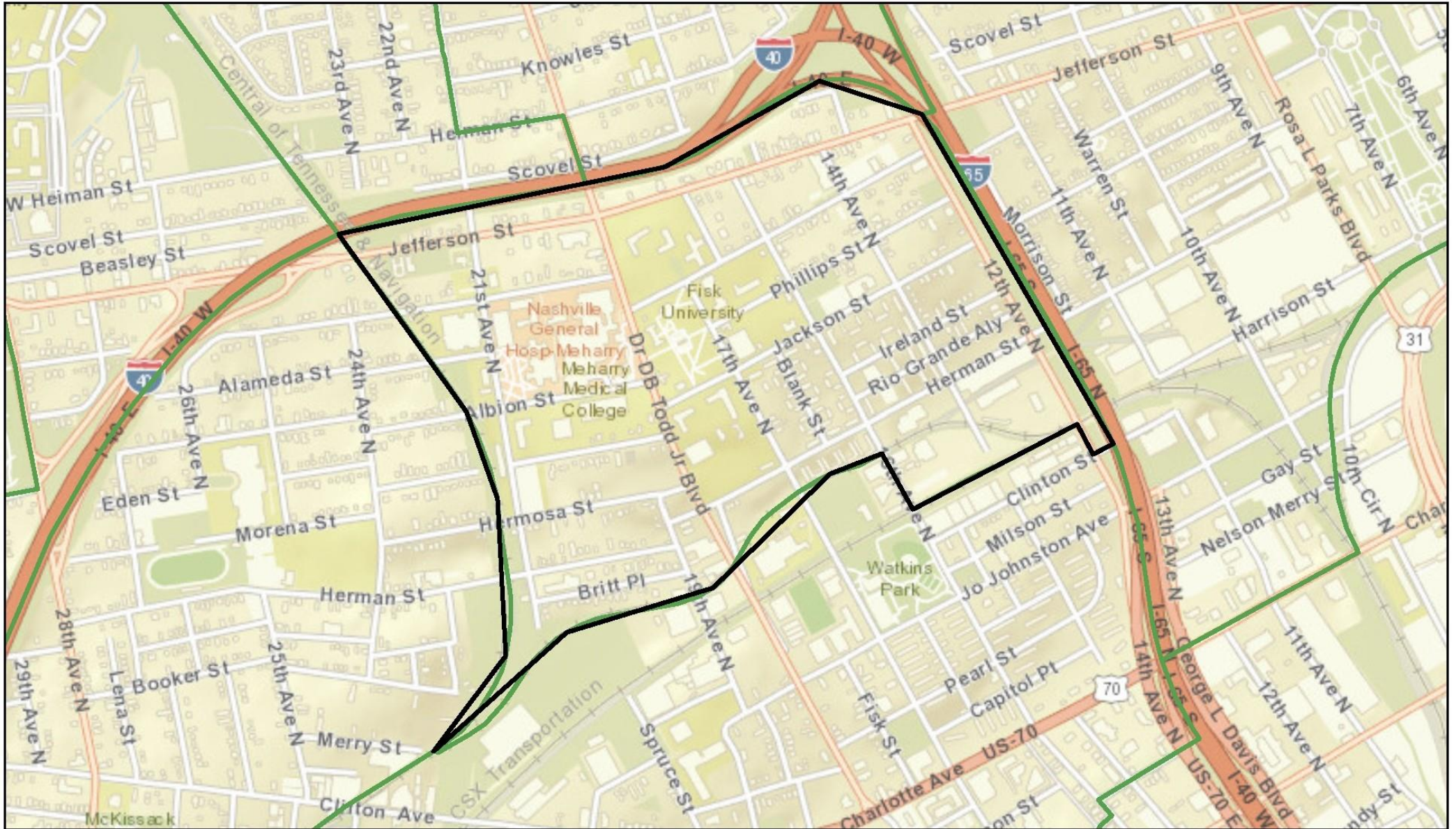
Low Mod Tract

0 0.1 0.2 0.4 mi

0 0.175 0.35 0.7 km

Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTom, MapmyIndia, © OpenstreetMap contributors, and the GIS User Community

CPO Maps- Census Tract 014200



April 6, 2015

Override 1

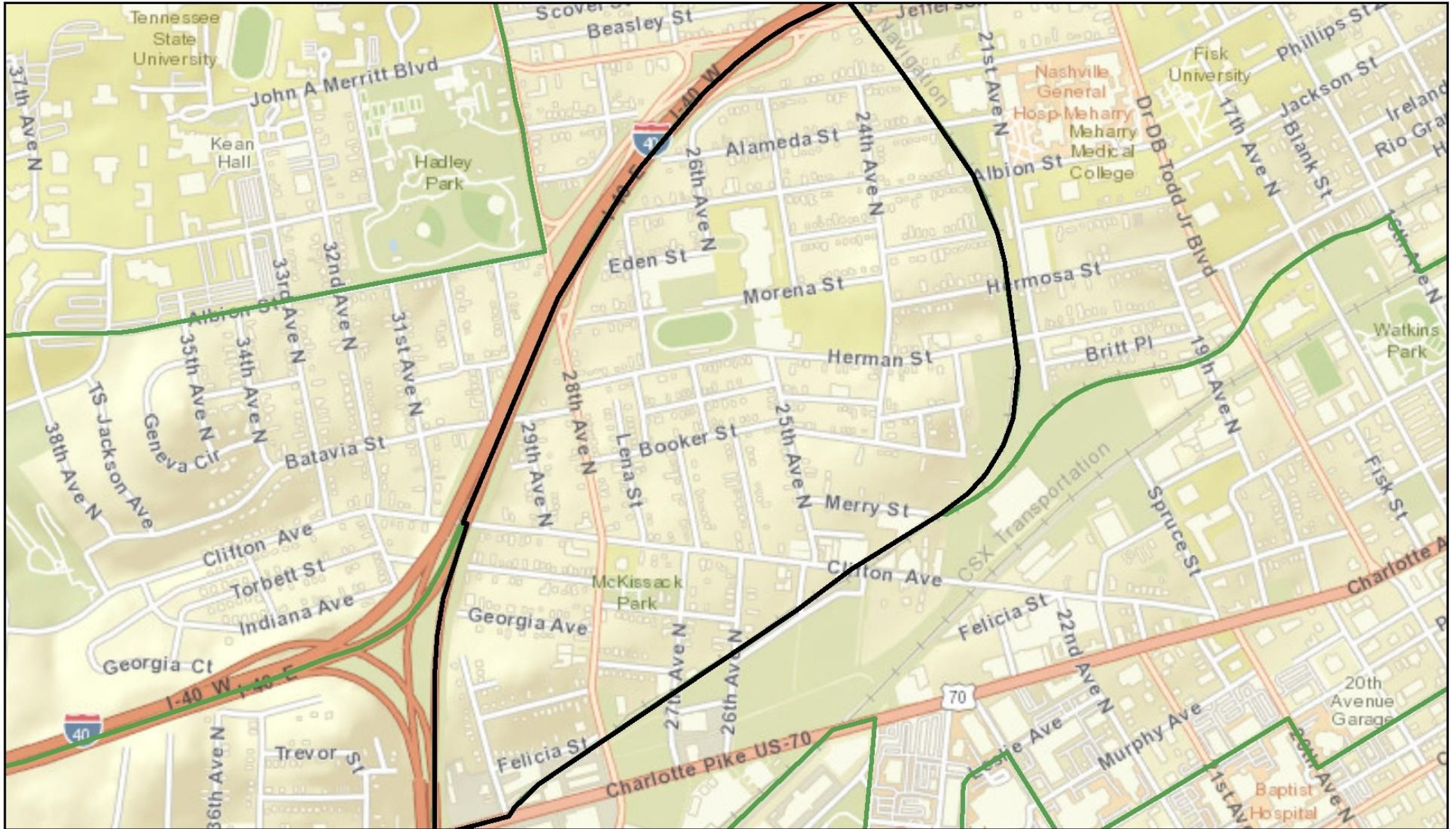
Low Mod Tract

0 0.1 0.2 0.4 mi

0 0.175 0.35 0.7 km

Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTom, MapmyIndia, © OpenstreetMap contributors, and the GIS User Community

CPO Maps- Census Tract 014300



April 6, 2015

Override 1

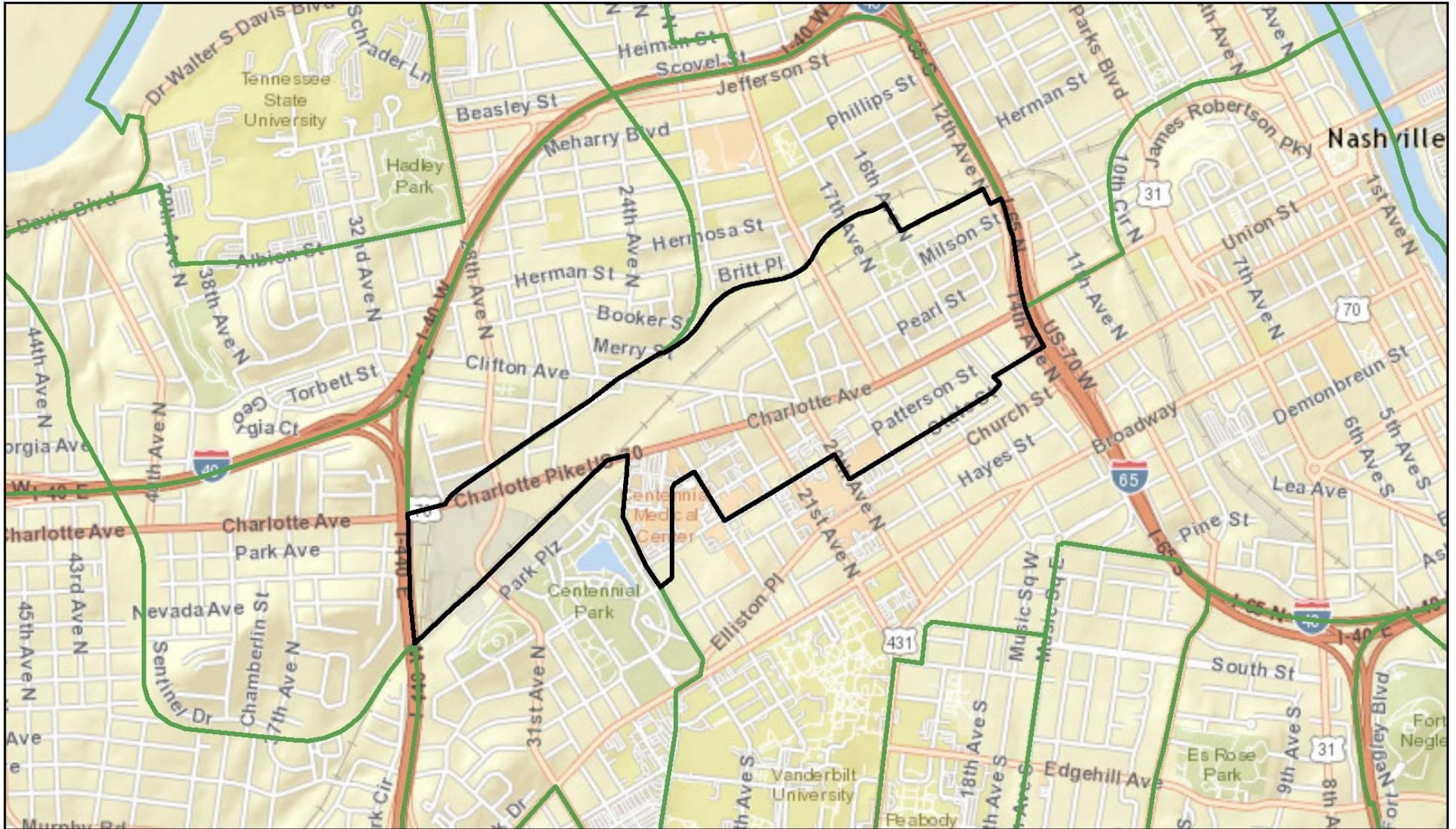
Low Mod Tract

0 0.1 0.2 0.4 mi

0 0.175 0.35 0.7 km

Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTom, MapmyIndia, © OpenstreetMap contributors, and the GIS User Community

CPO Maps- Census Tract 014400



April 6, 2015

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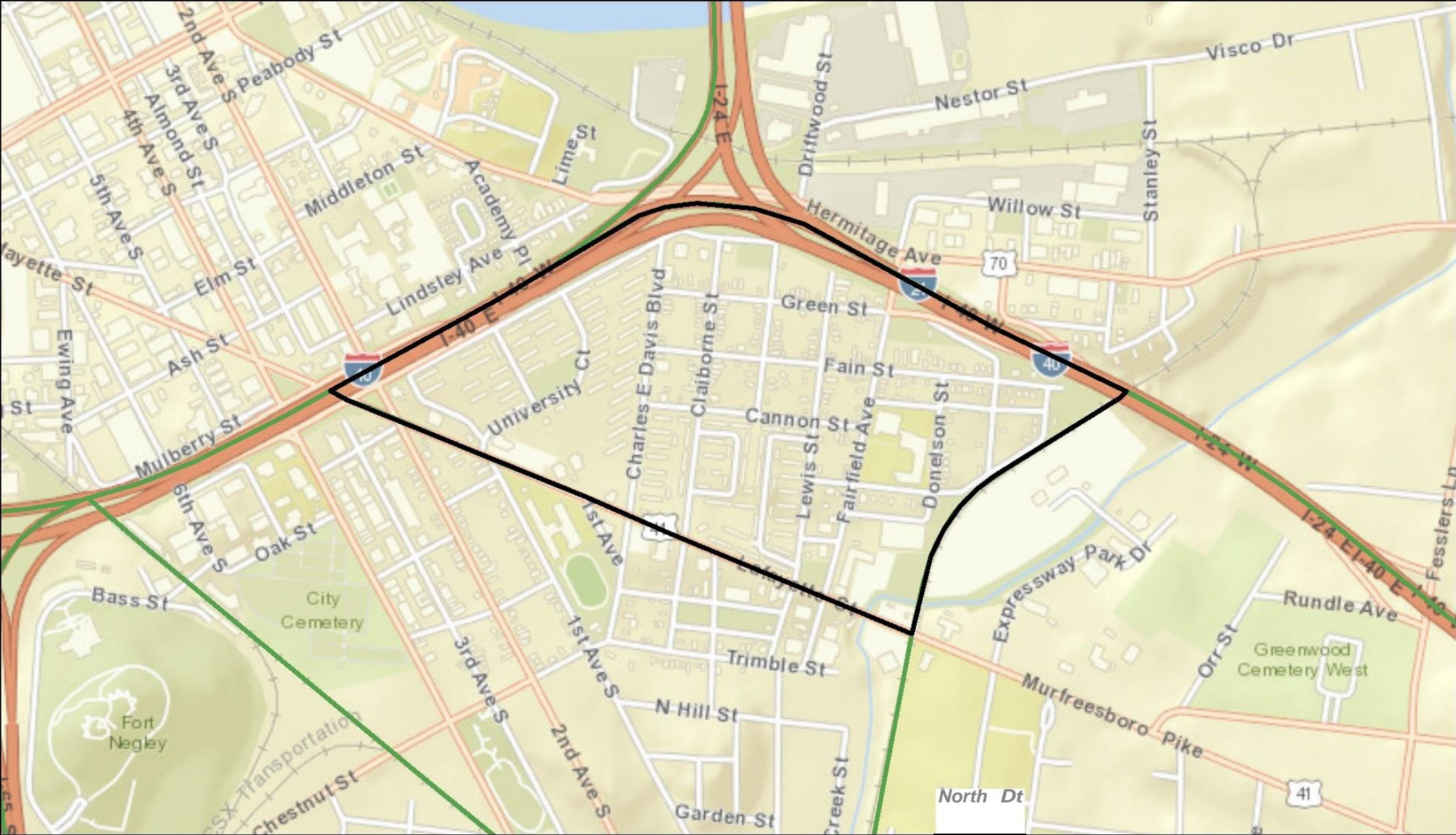
Low Mod Tract

0 0.225 0.45 0.9 mi

0 0.375 0.75 1.5 km

Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTom, MapmyIndia, © OpenStreetMap contributors, and the GIS User Community

CPO Maps- Census Tract 014800



April 6, 2015

Override 1

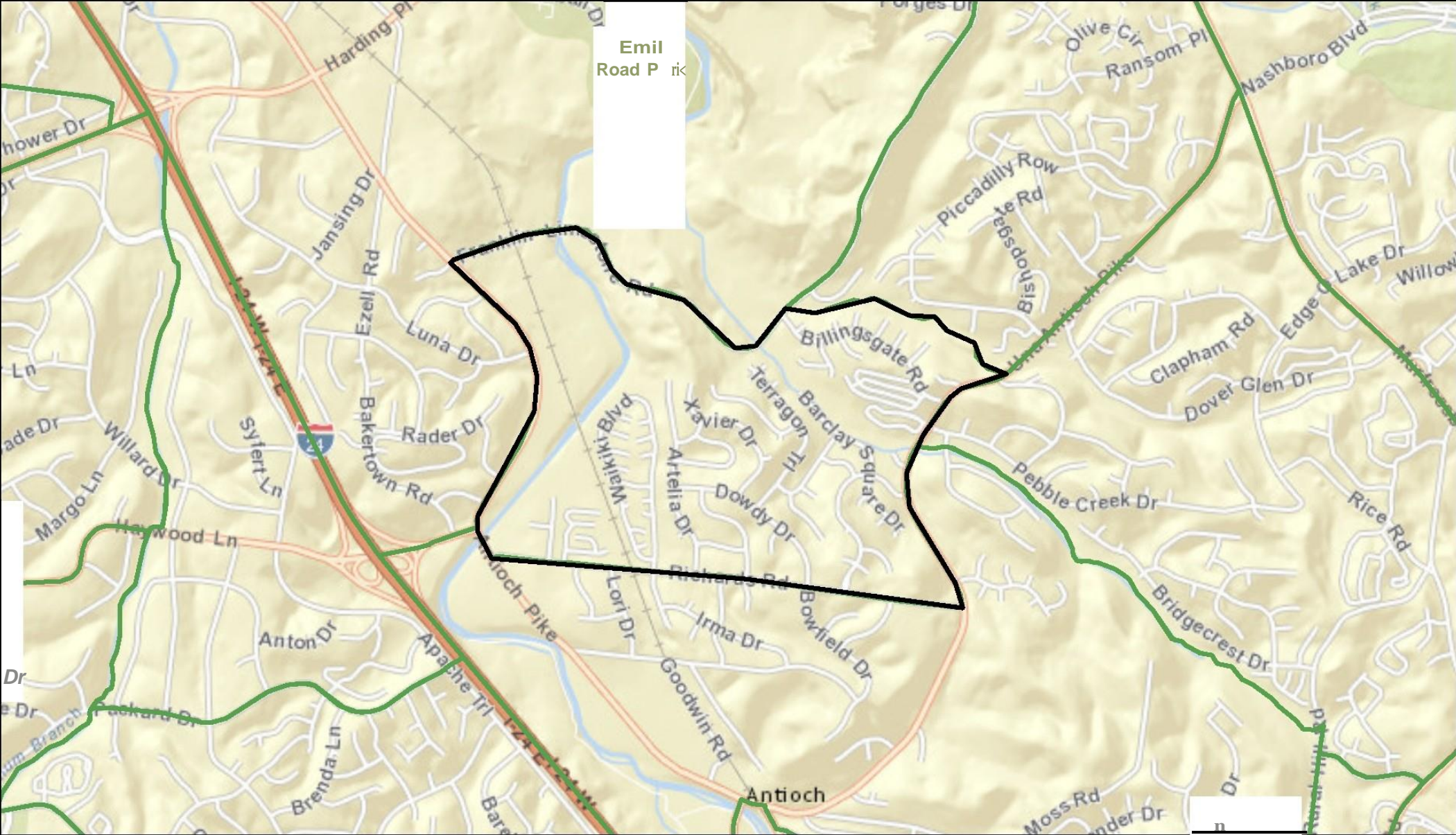
Low Mod Tract

0 0.1 0.2 0.4 mi

0 0.175 0.35 0.7 km

Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTom, MapmyIndia, © OpenstreetMap contributors, and the GIS User Community

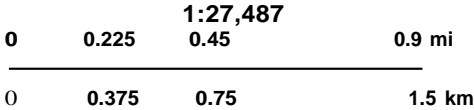
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April 6, 2015

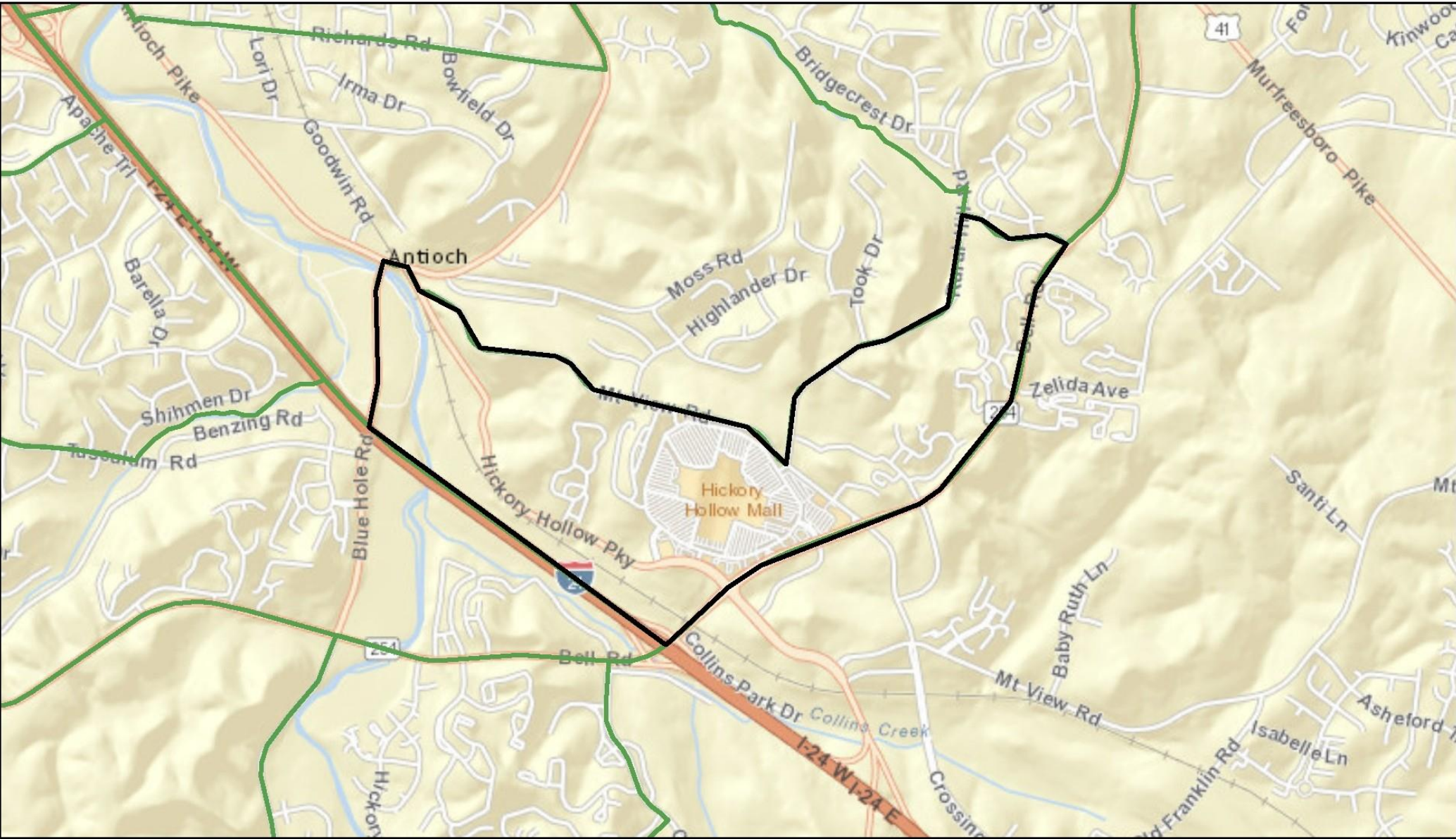
Override 1

Low Mod Tract



Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp. NRCAN, Esrt Japan, METI, Esri China (Hong Kong), Esrt (Thailand), TomTom, MapnyIndia, © OpenstreetMap contributors, and the GIS User Community

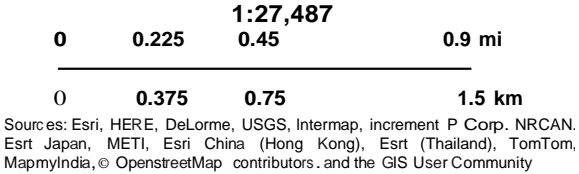
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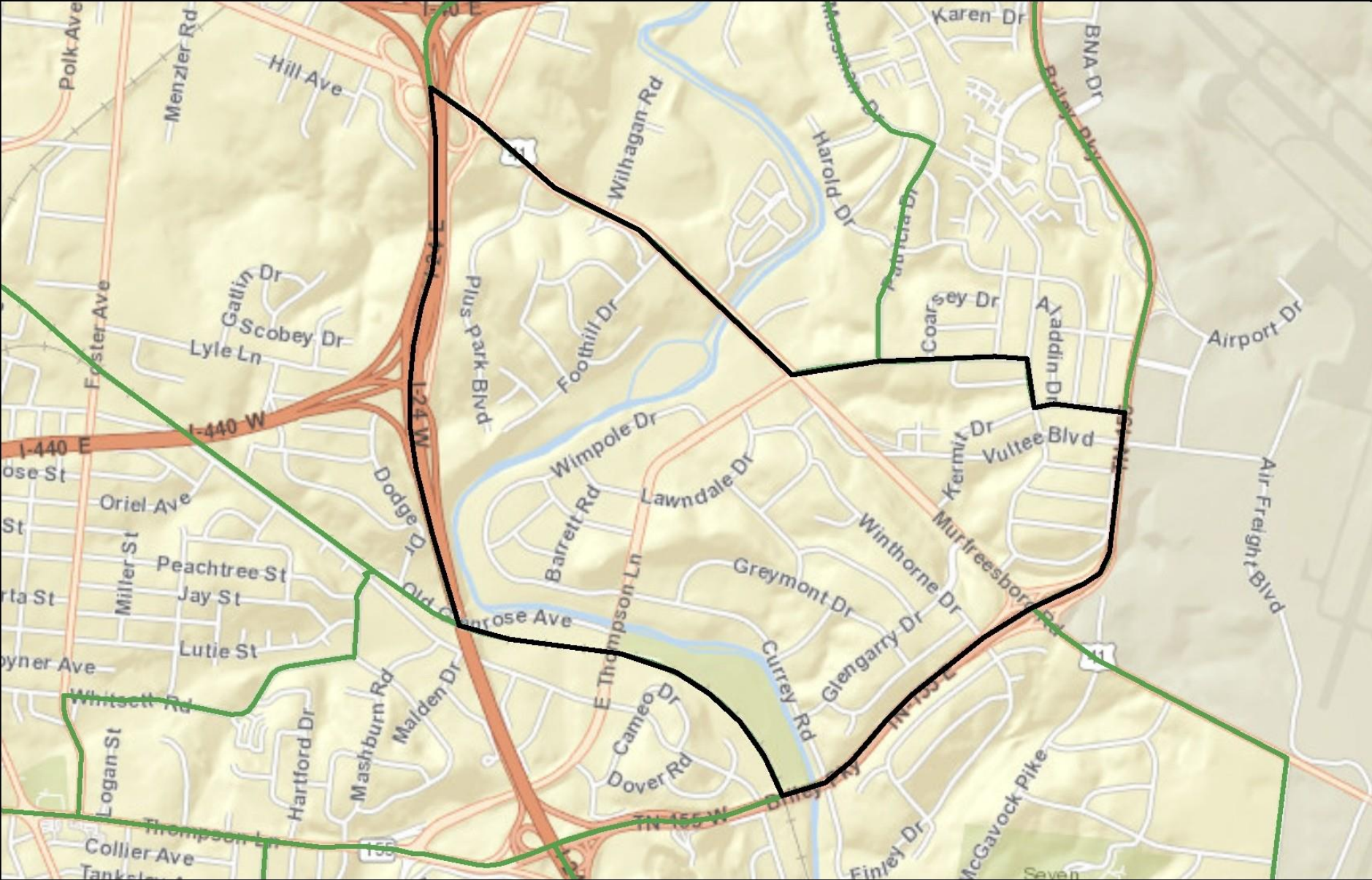
April 6, 2015

Override 1

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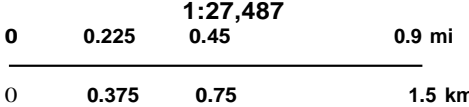
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April 6, 2015

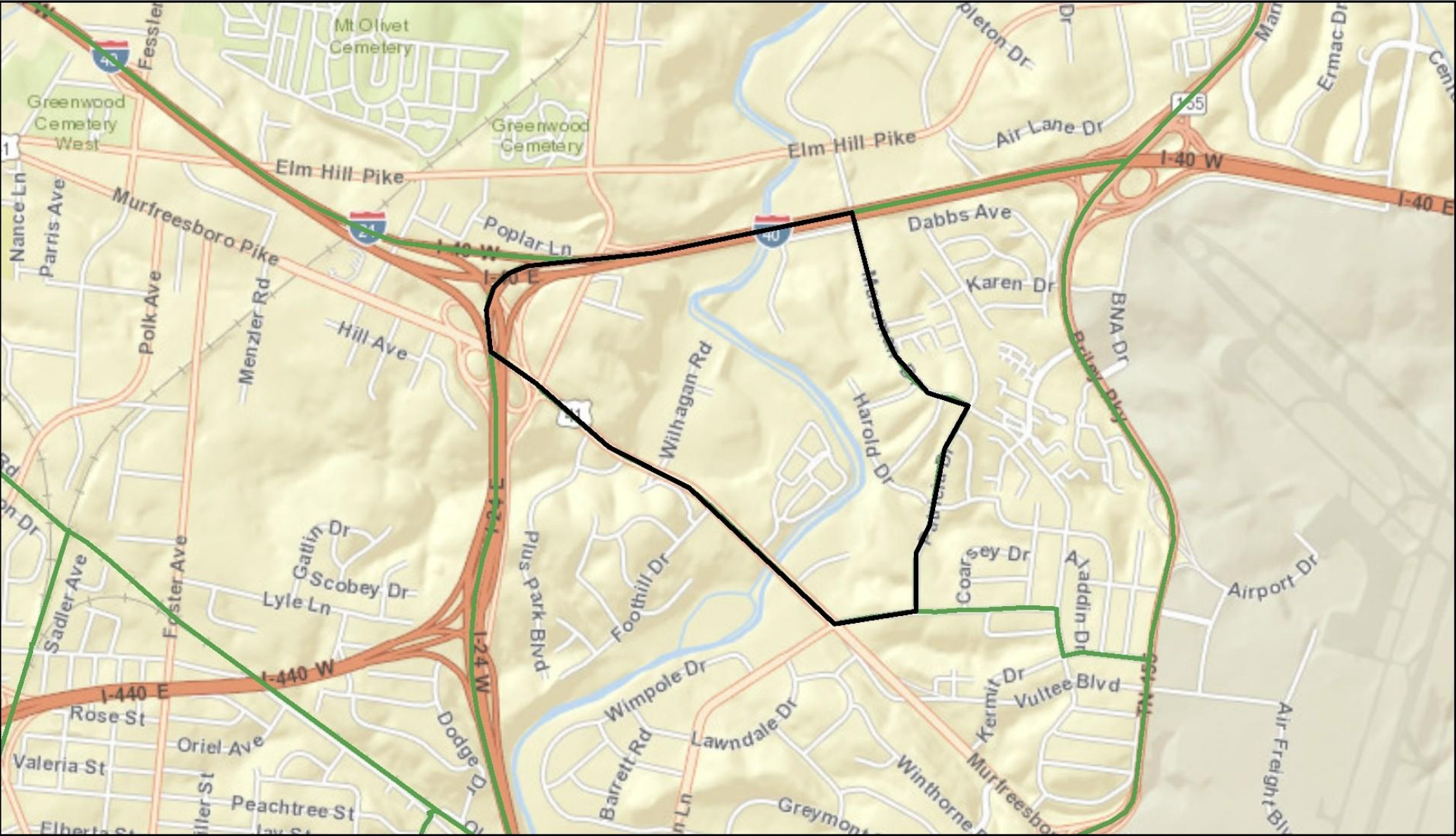
Override 1

Low Mod Tract



Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTom, MapmyIndia, © OpenstreetMap contributors, and the GIS User Community

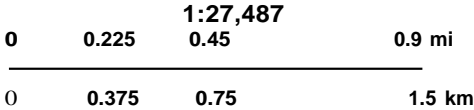
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April 6, 2015

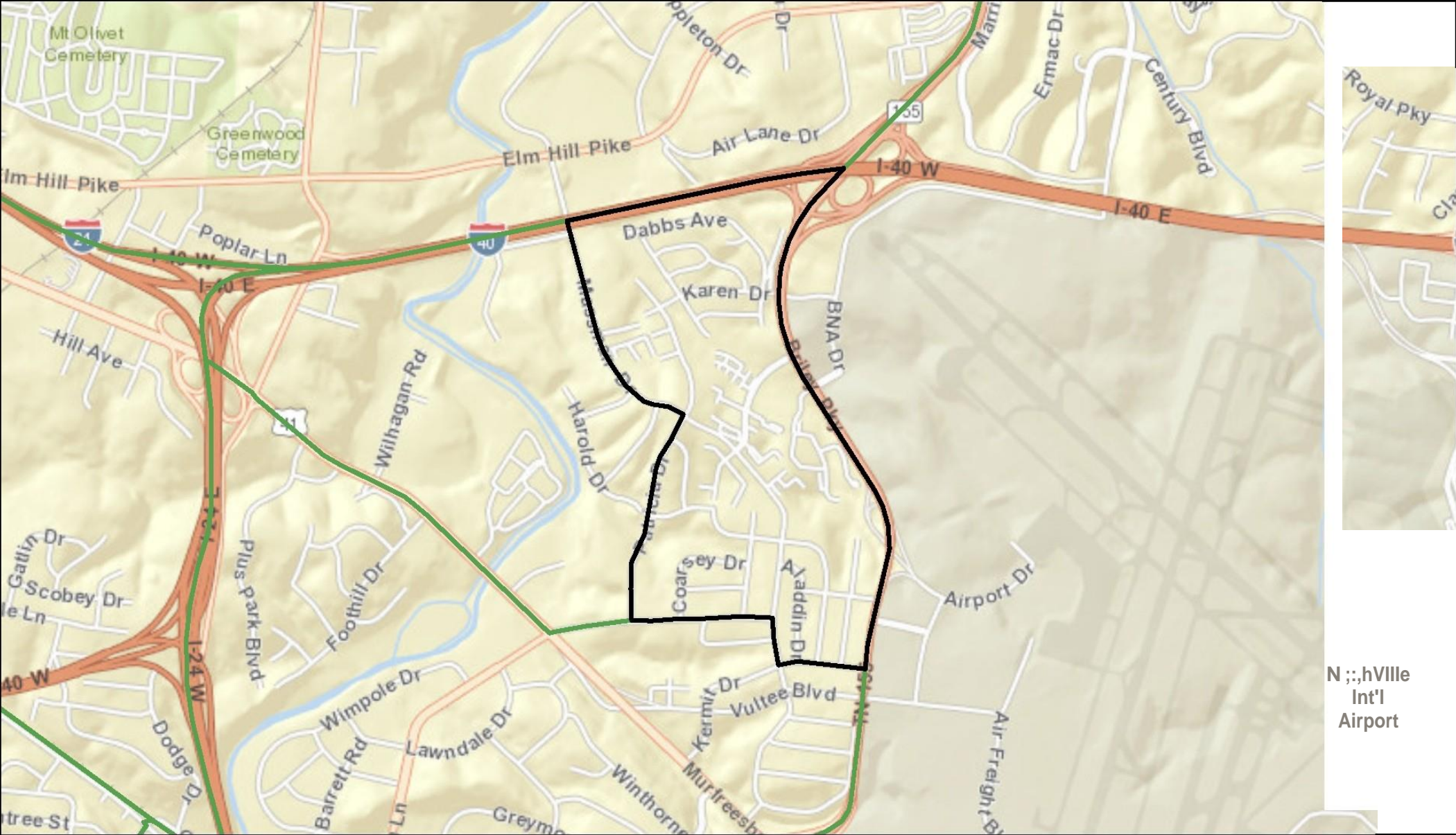
Override 1

Low Mod Tract



Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTom, MapmyIndia, © OpenstreetMap contributors, and the GIS User Community

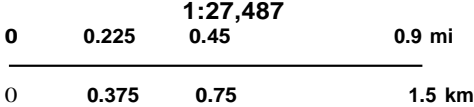
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April 6, 2015

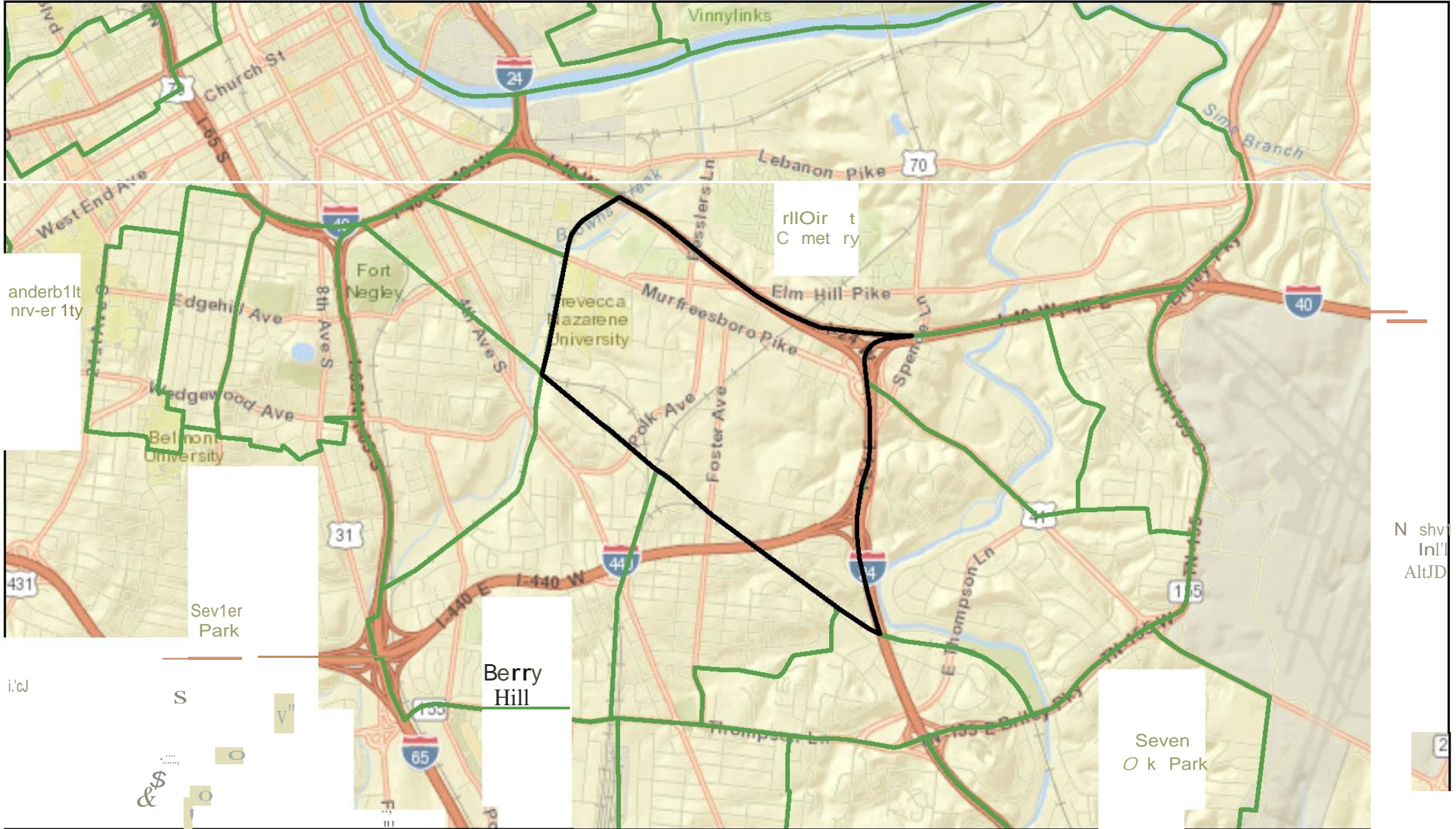
Override 1

Low Mod Tract



Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTom, MapmyIndia, © OpenstreetMap contributors, and the GIS User Community

CPO Maps - Census Tract 015900



April 6, 2015

Override 1

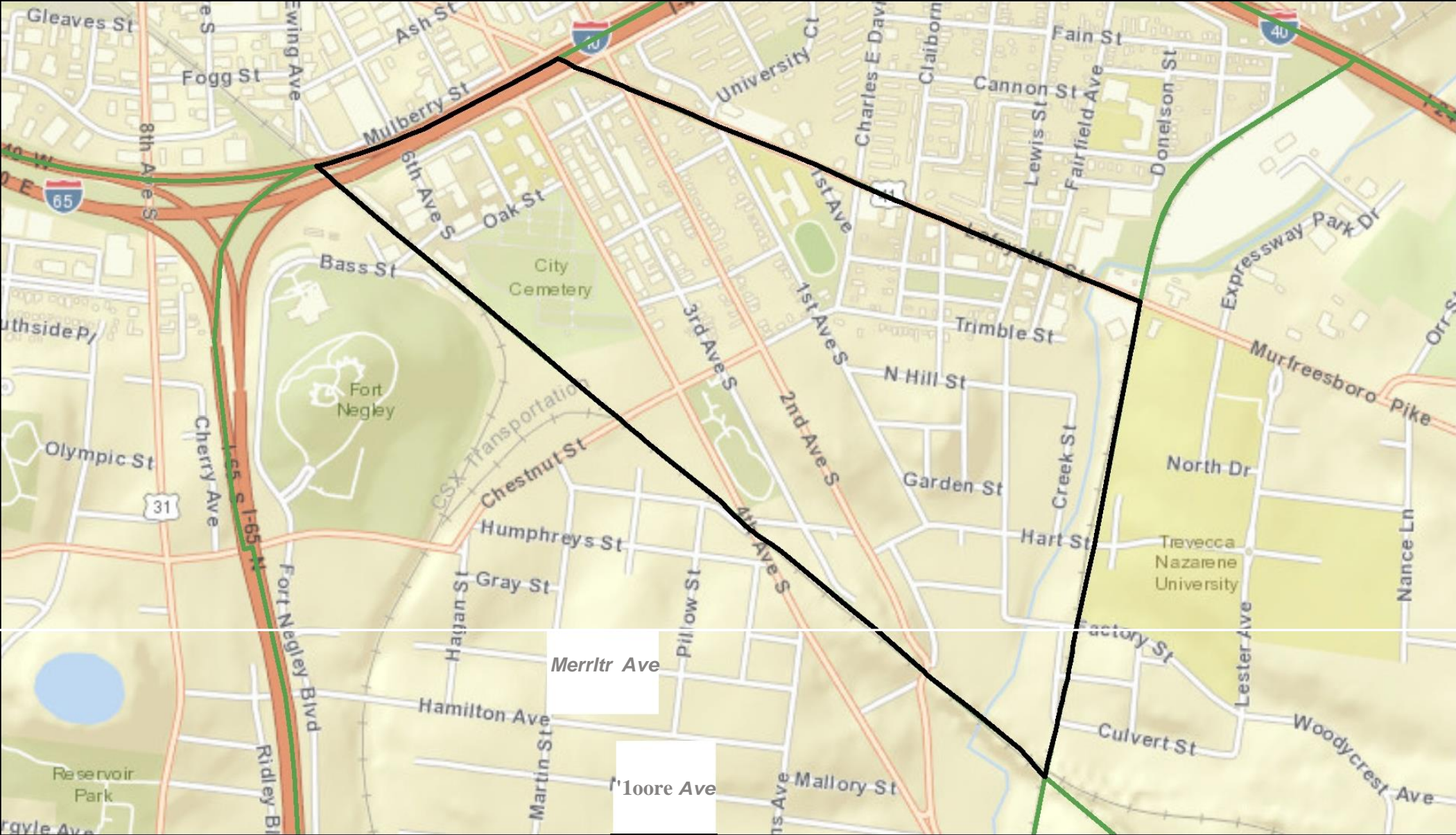
Low Mod Tract

1:54,974
0 0.475 0.95 1.9 mi

0 0.75 1.5 3 km

Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTom, MapnyIndia, © OpenstreetMap contributors, and the GIS User Community

CPO Maps- Census Tract 016000



April 6, 2015

Override 1

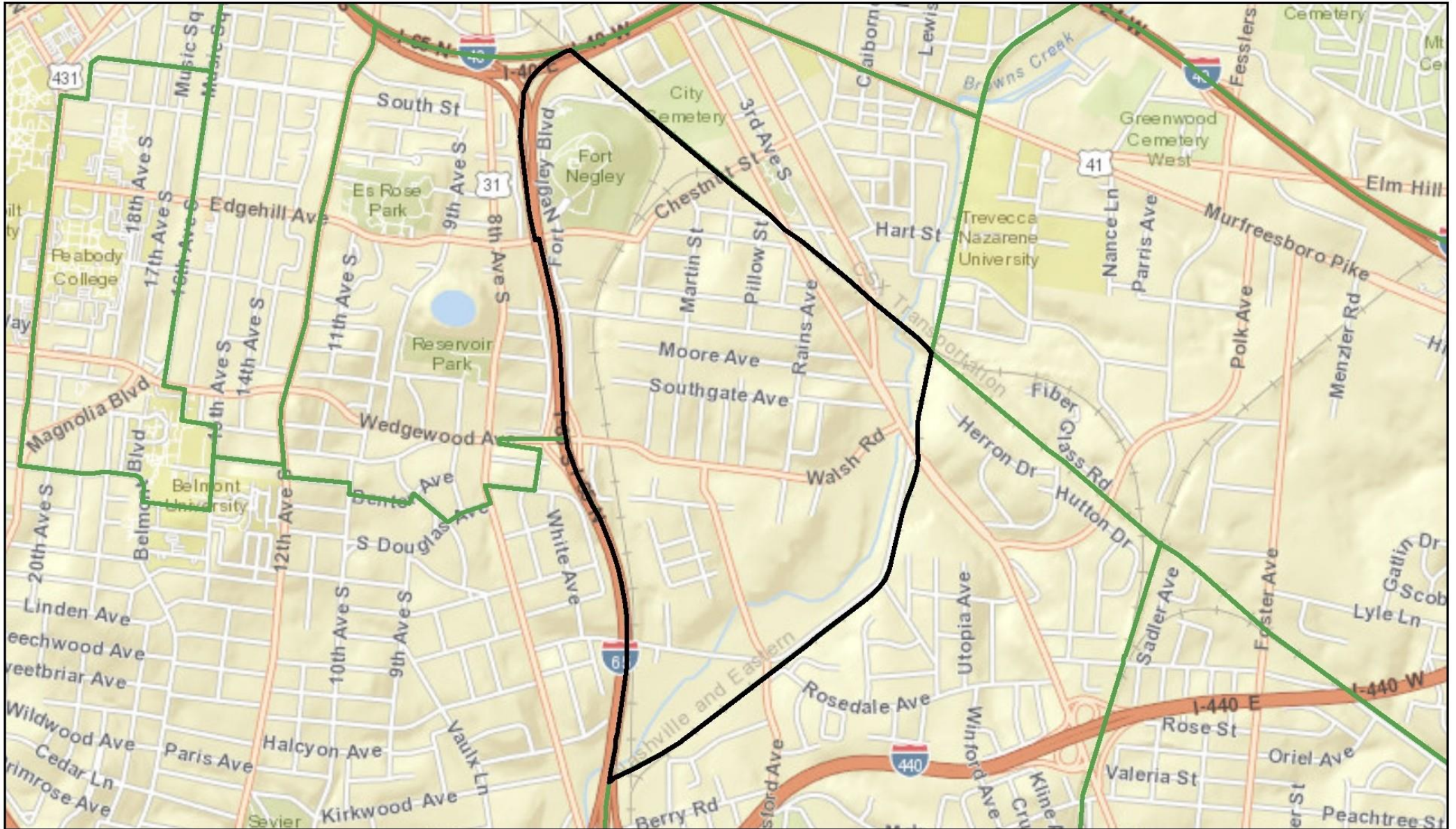
Low Mod Tract

0 0.1 0.2 0.4 mi

0 0.175 0.35 0.7 km

Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTom, MapmyIndia, © OpenstreetMap contributors, and the GIS User Community

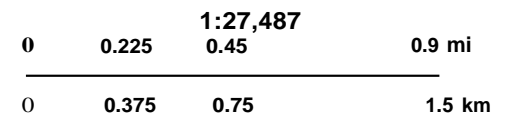
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April 6, 2015

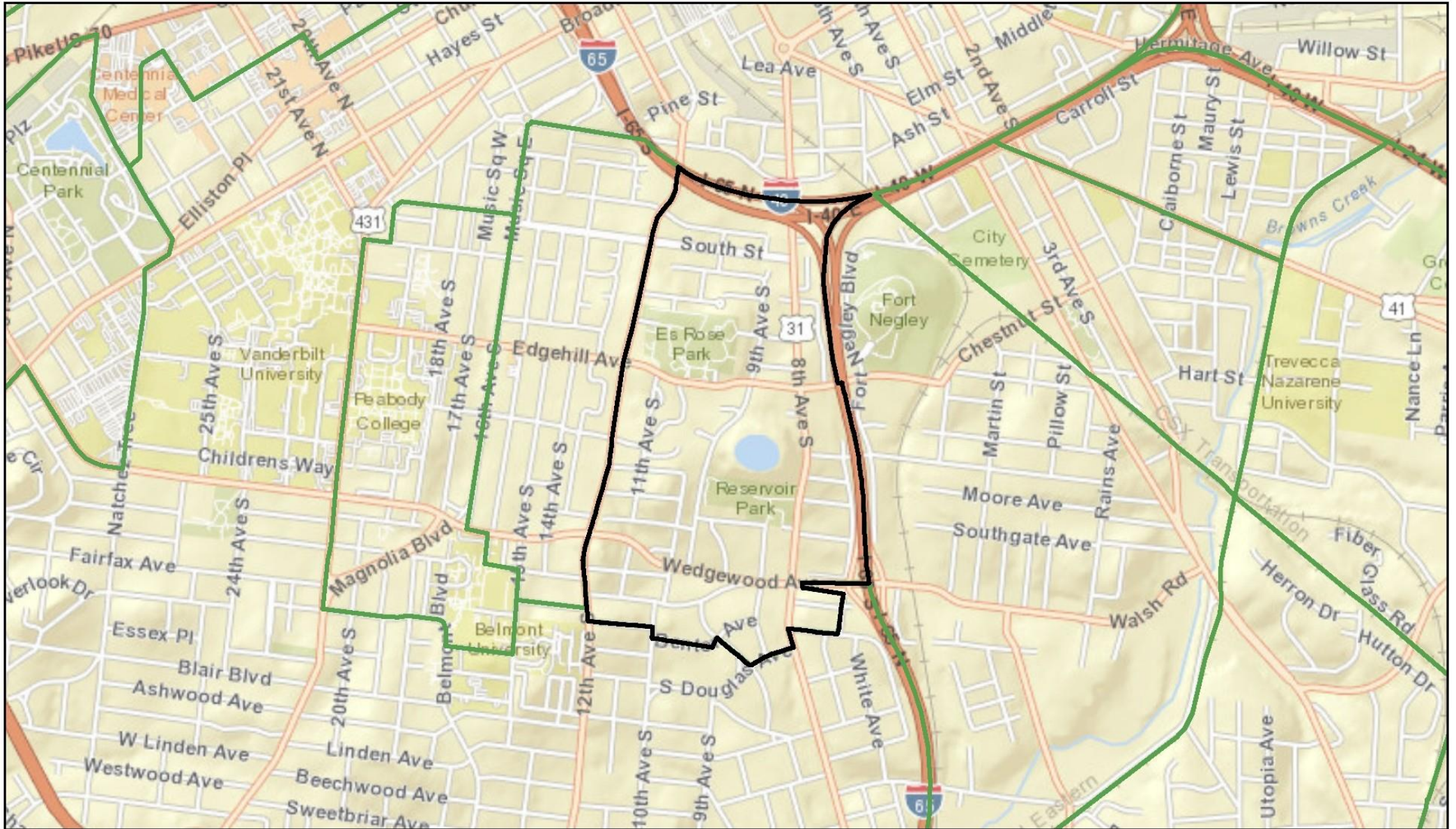
Override 1

Low Mod Tract



Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTom, MapmyIndia, © OpenstreetMap contributors, and the GIS User Community

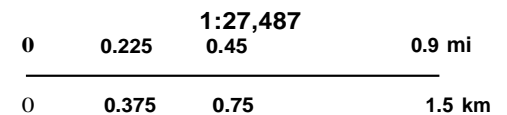
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April 6, 2015

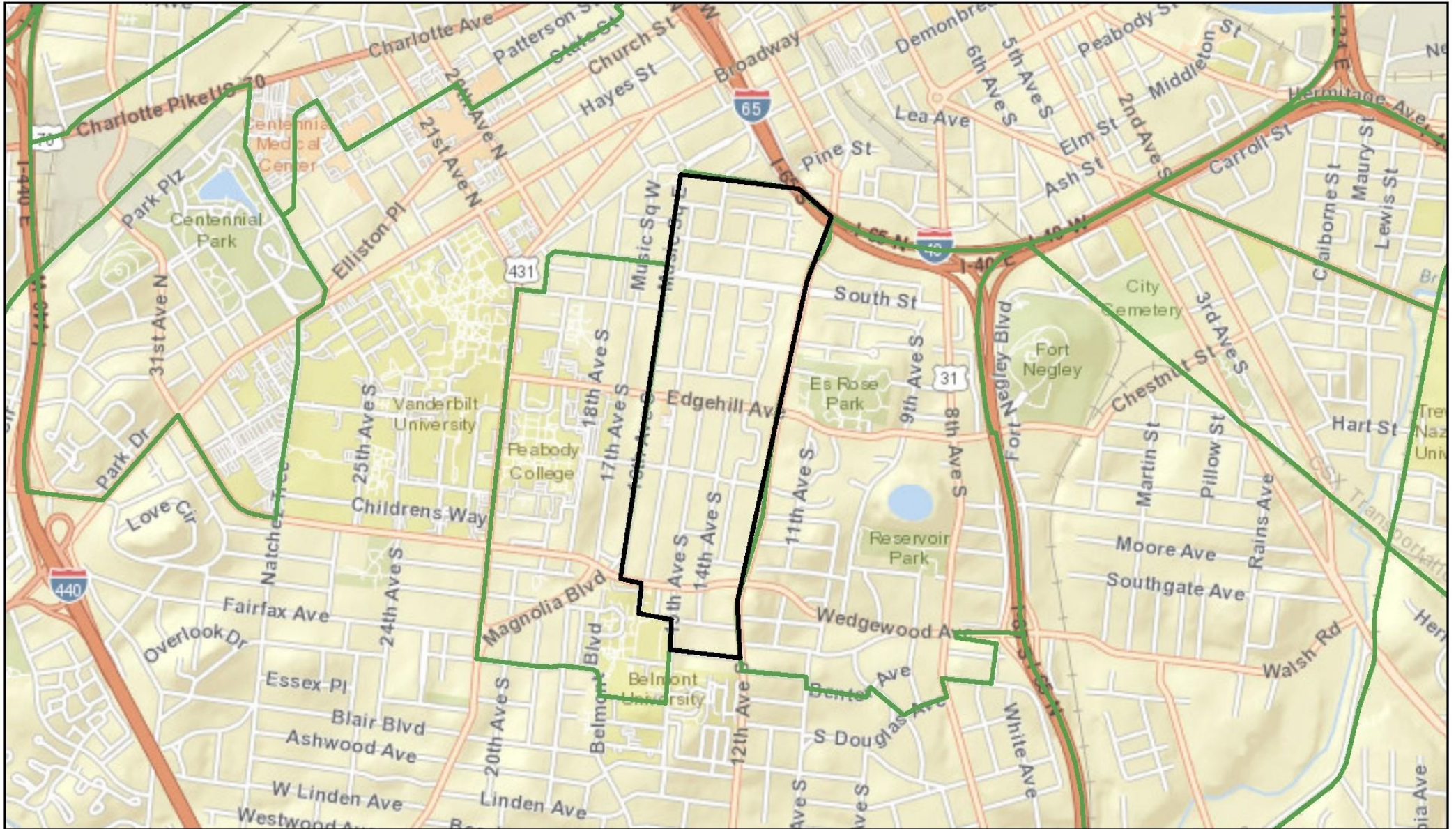
Override 1

Low Mod Tract



Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTom, MapmyIndia, © OpenstreetMap contributors, and the GIS User Community

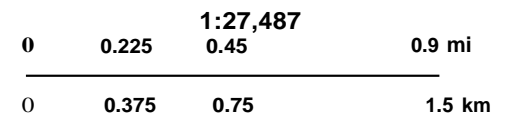
CPO Maps- Census Tract 016300



April 6, 2015

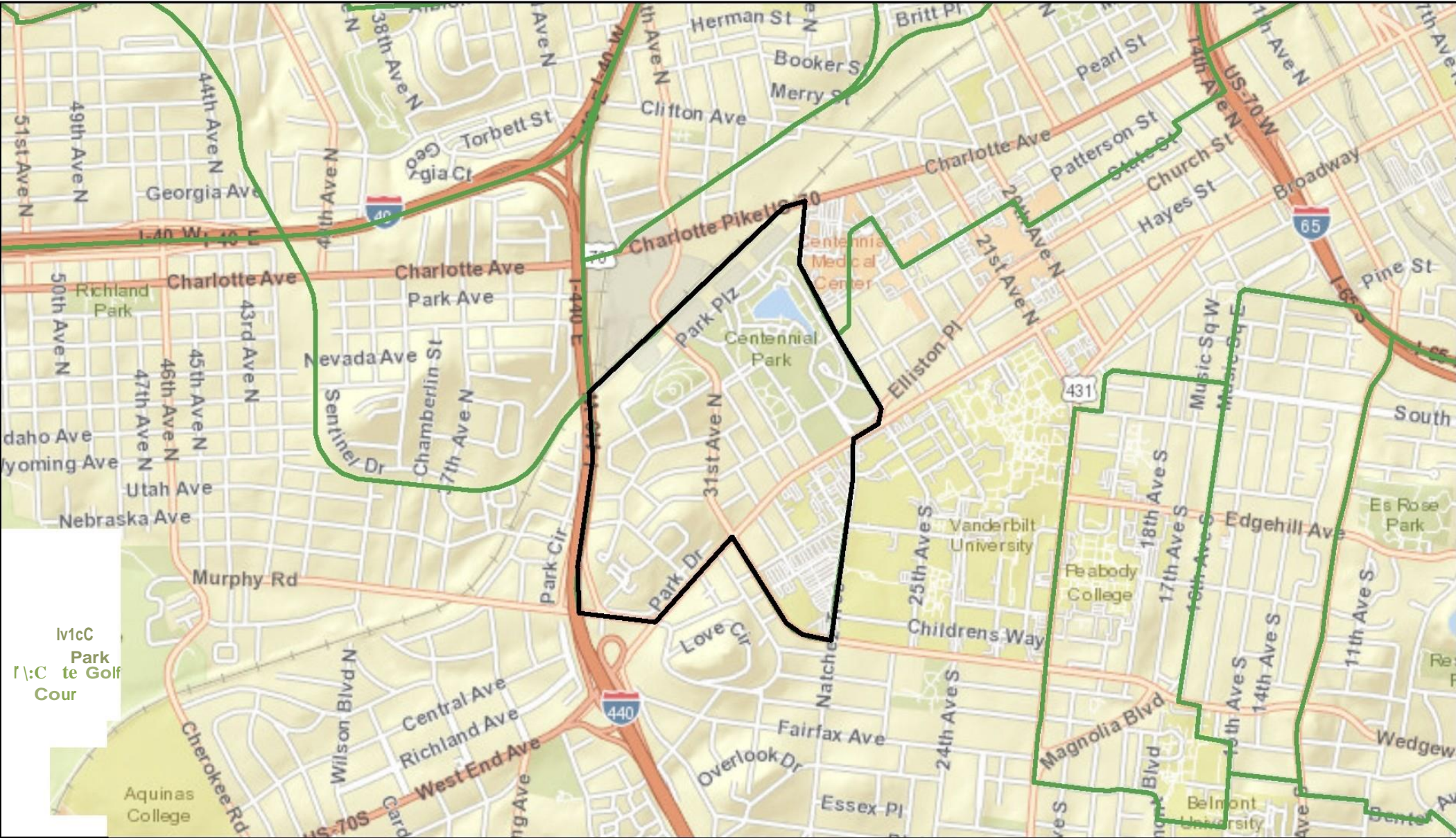
Override 1

Low Mod Tract



Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTom, MapmyIndia, © OpenstreetMap contributors, and the GIS User Community

CPO Maps- Census Tract 016600



April 9, 2015

Override 1

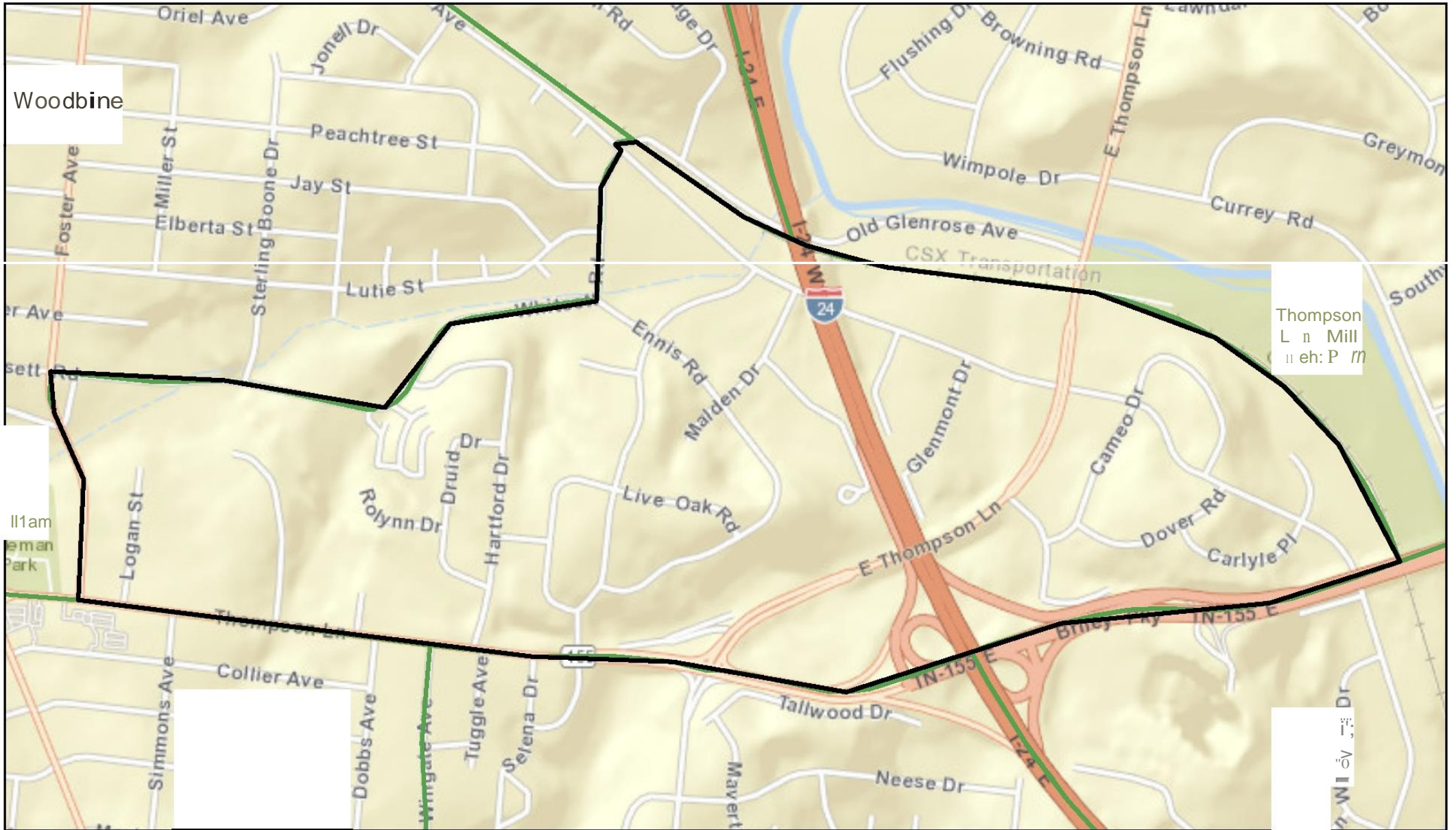
Low Mod Tract

0 0.225 0.45 0.9 mi

0 0.375 0.75 1.5 km

Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTom, MapmyIndia, © OpenstreetMap contributors, and the GIS User Community

CPO Maps- Census Tract 017401



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Park

April 6, 2015

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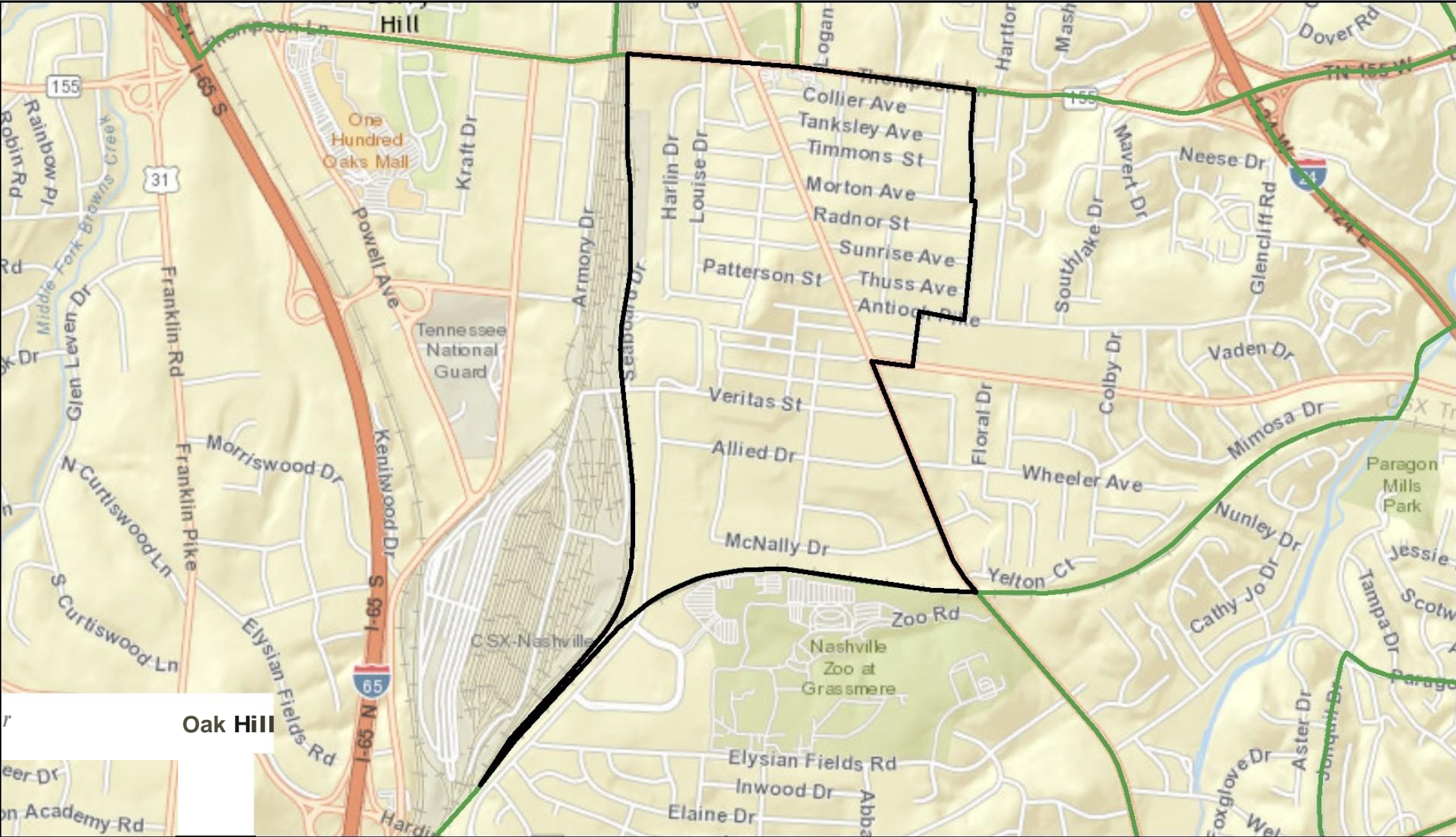
Low Mod Tract

0 0.1 0.2 0.4 mi

0 0.175 0.35 0.7 km

Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTom, MapmyIndia, © OpenstreetMap contributors, and the GIS User Community

CPO Maps - Census Tract 017500

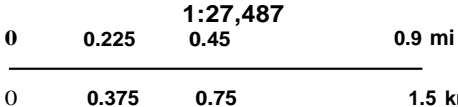


Oak Hill

April 6, 2015

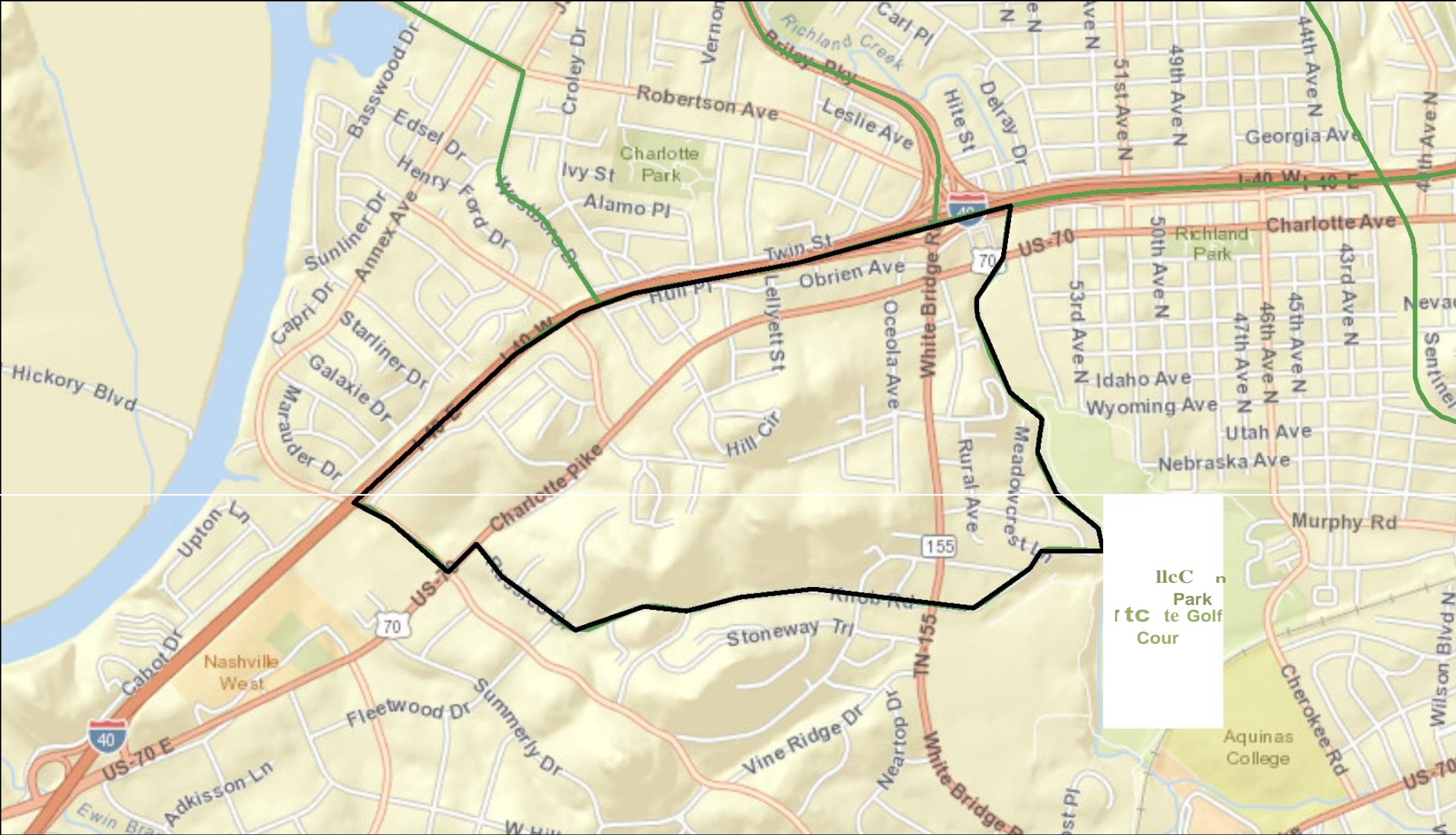
Override 1

Low Mod Tract



Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp. NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTom, MapnyIndia, © OpenstreetMap contributors, and the GIS User Community

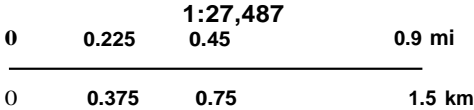
CPO Maps- Census Tract 018101



April 6, 2015

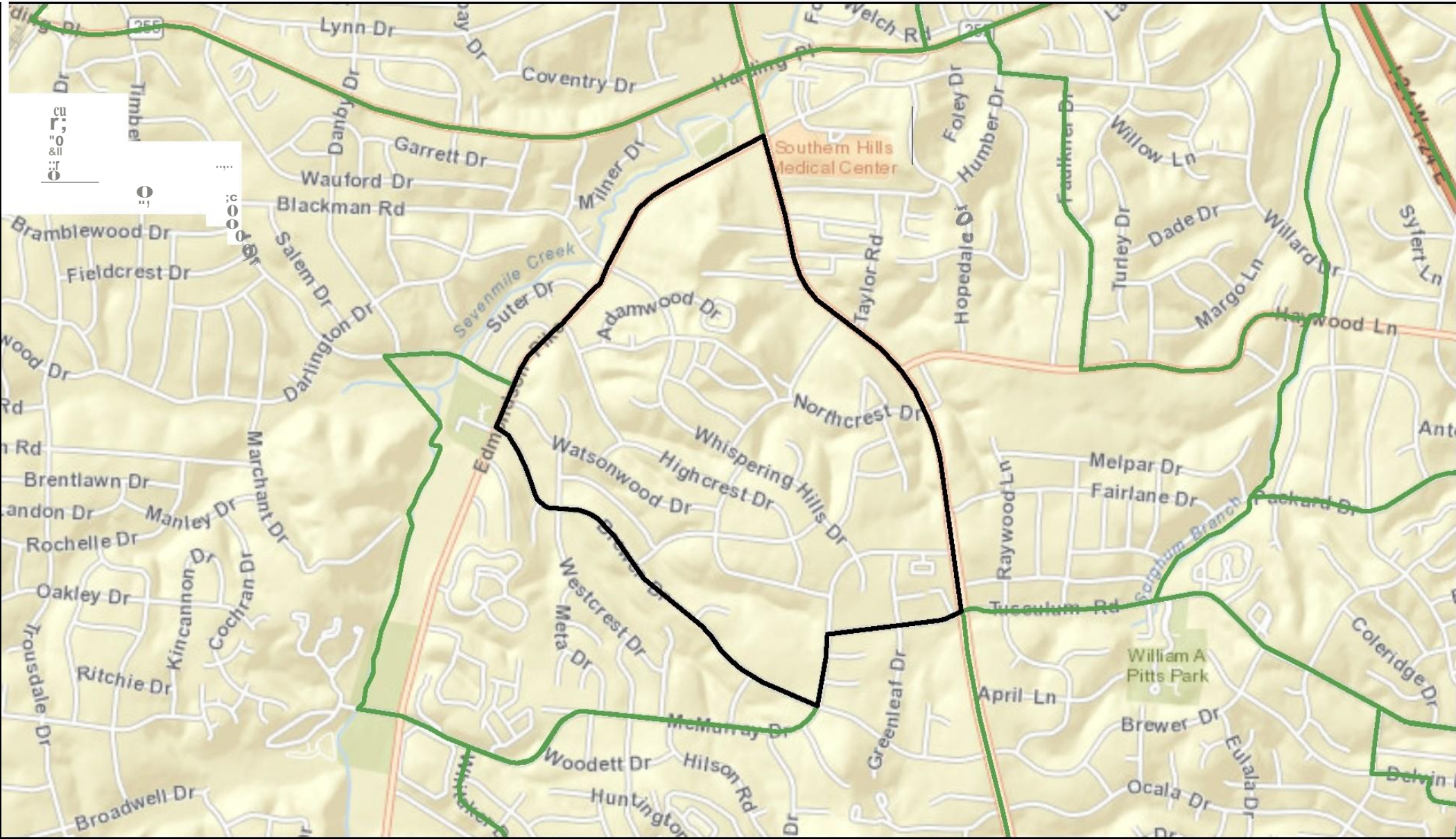
Override 1

Low Mod Tract



Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp. NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTom, MapmyIndia, © OpenstreetMap contributors, and the GIS User Community

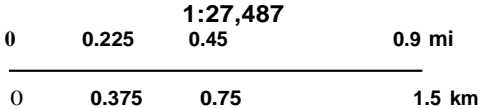
CPO Maps - Census Tract 018904



April 6, 2015

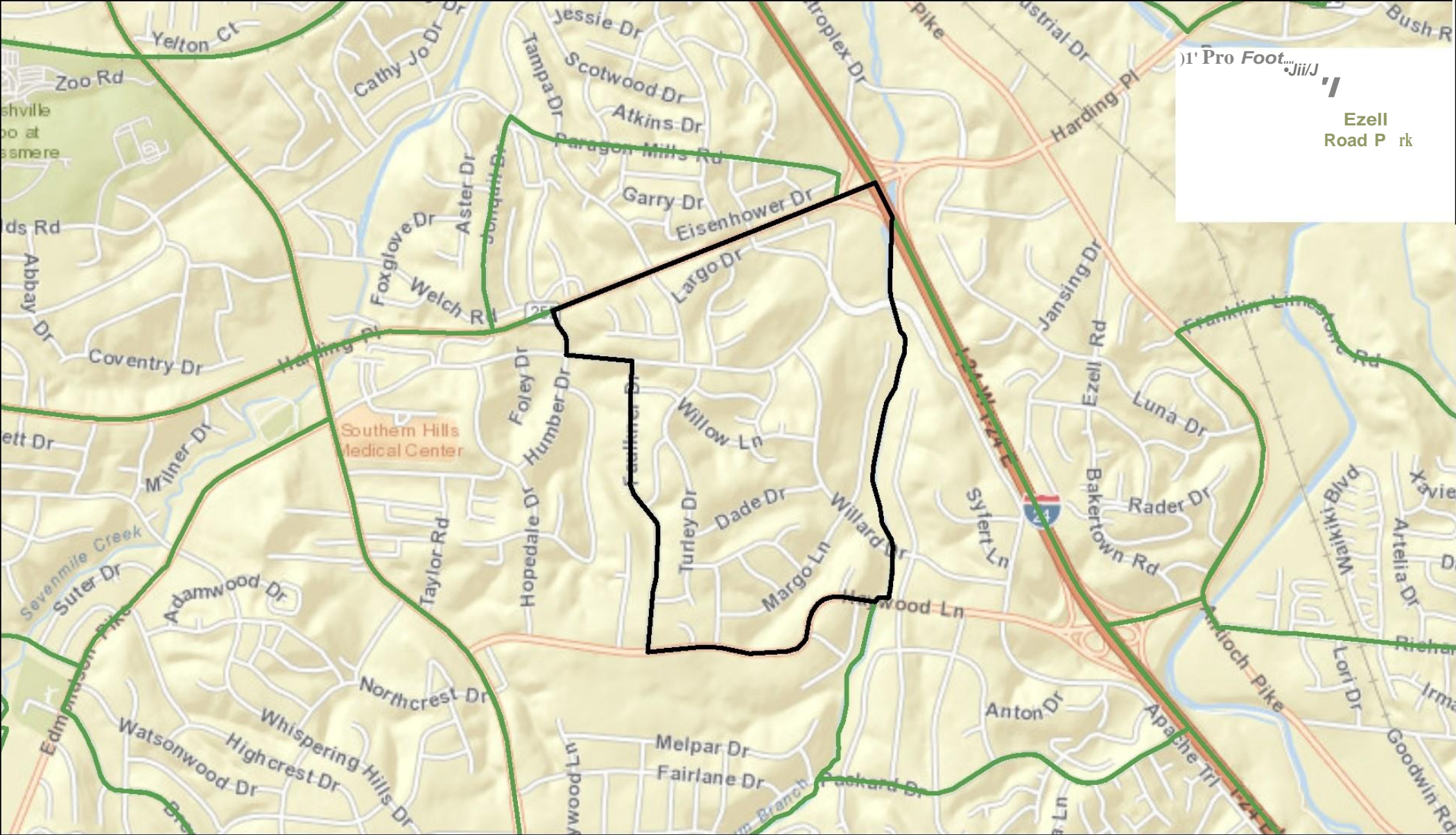
Override 1

Low Mod Tract



Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTom, MapnyIndia, © OpenstreetMap contributors, and the GIS User Community

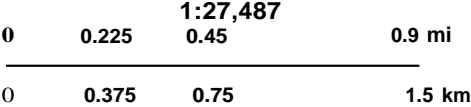
CPO Maps - Census Tract 019003



April 6, 2015

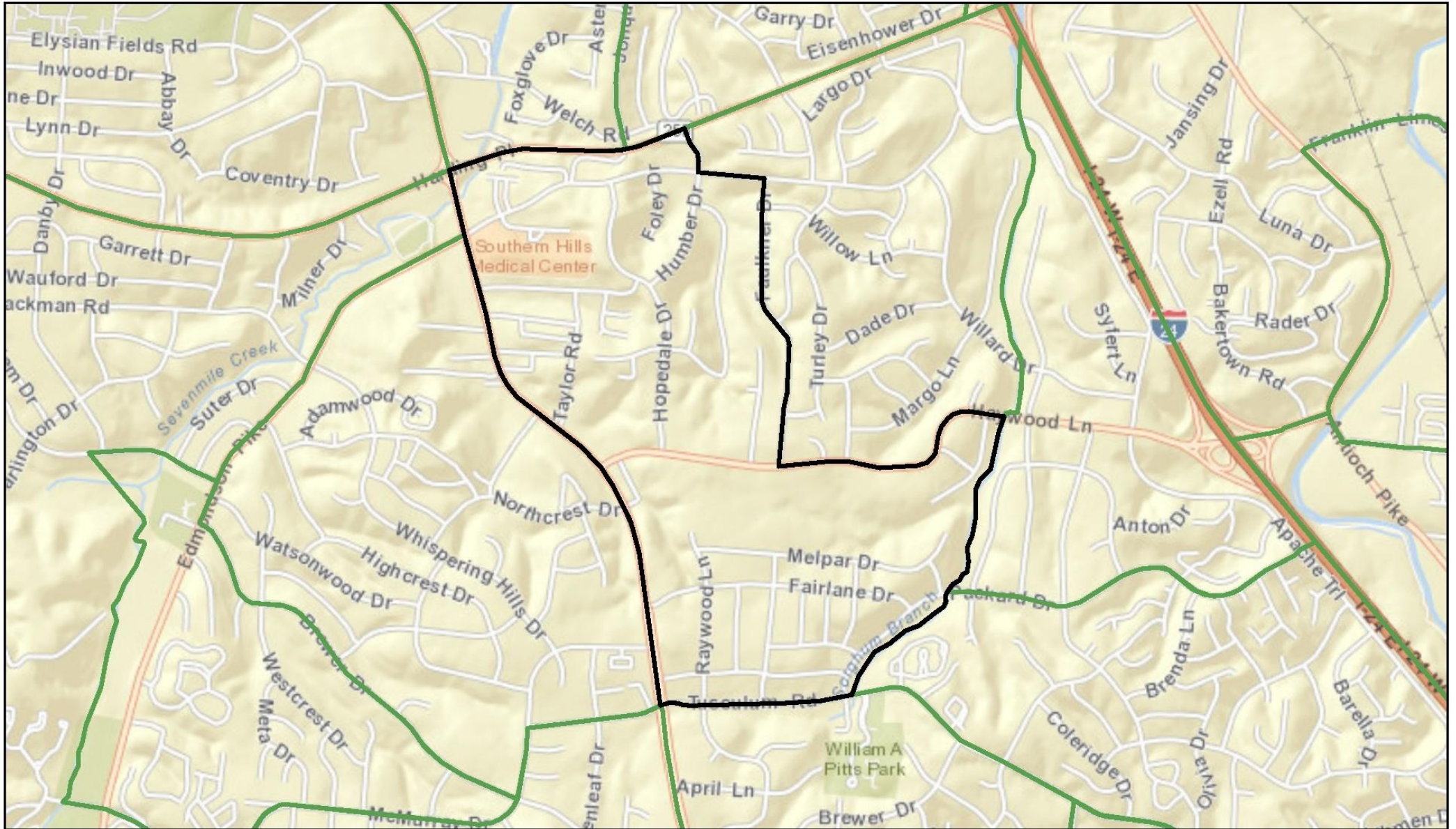
Override 1

Low Mod Tract



Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRCAN, Esrt Japan, METI, Esri China (Hong Kong), Esrt (Thailand), TomTom, MapnyIndia, © OpenstreetMap contributors, and the GIS User Community

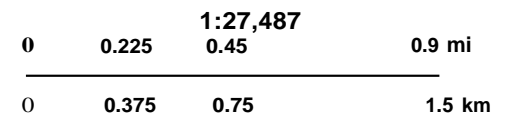
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April 6, 2015

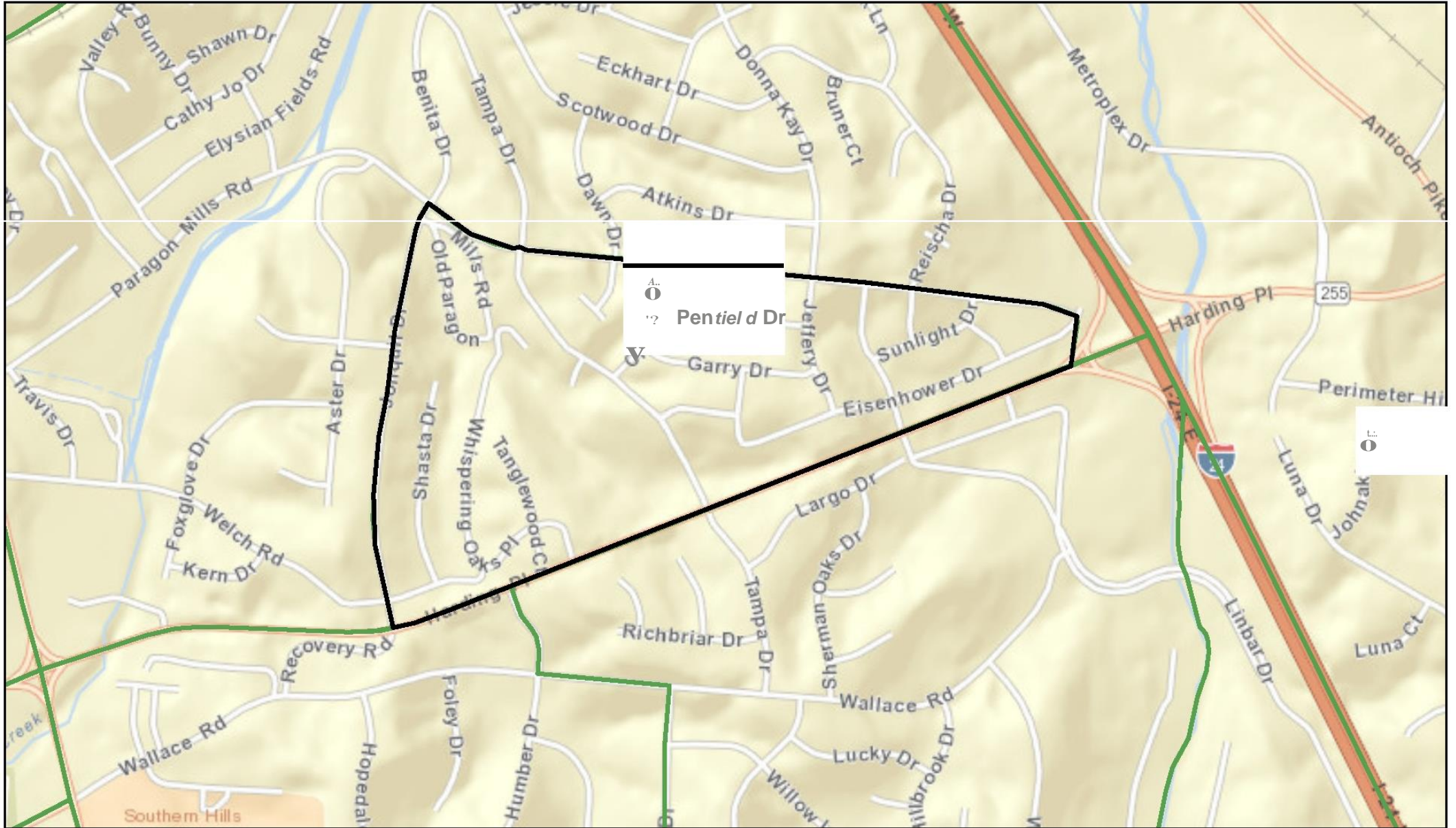
Override 1

Low Mod Tract



Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTom, MapmyIndia, © OpenstreetMap contributors, and the GIS User Community

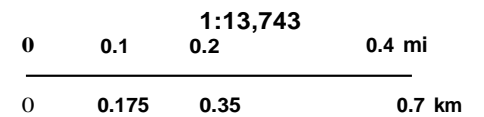
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April 6, 2015

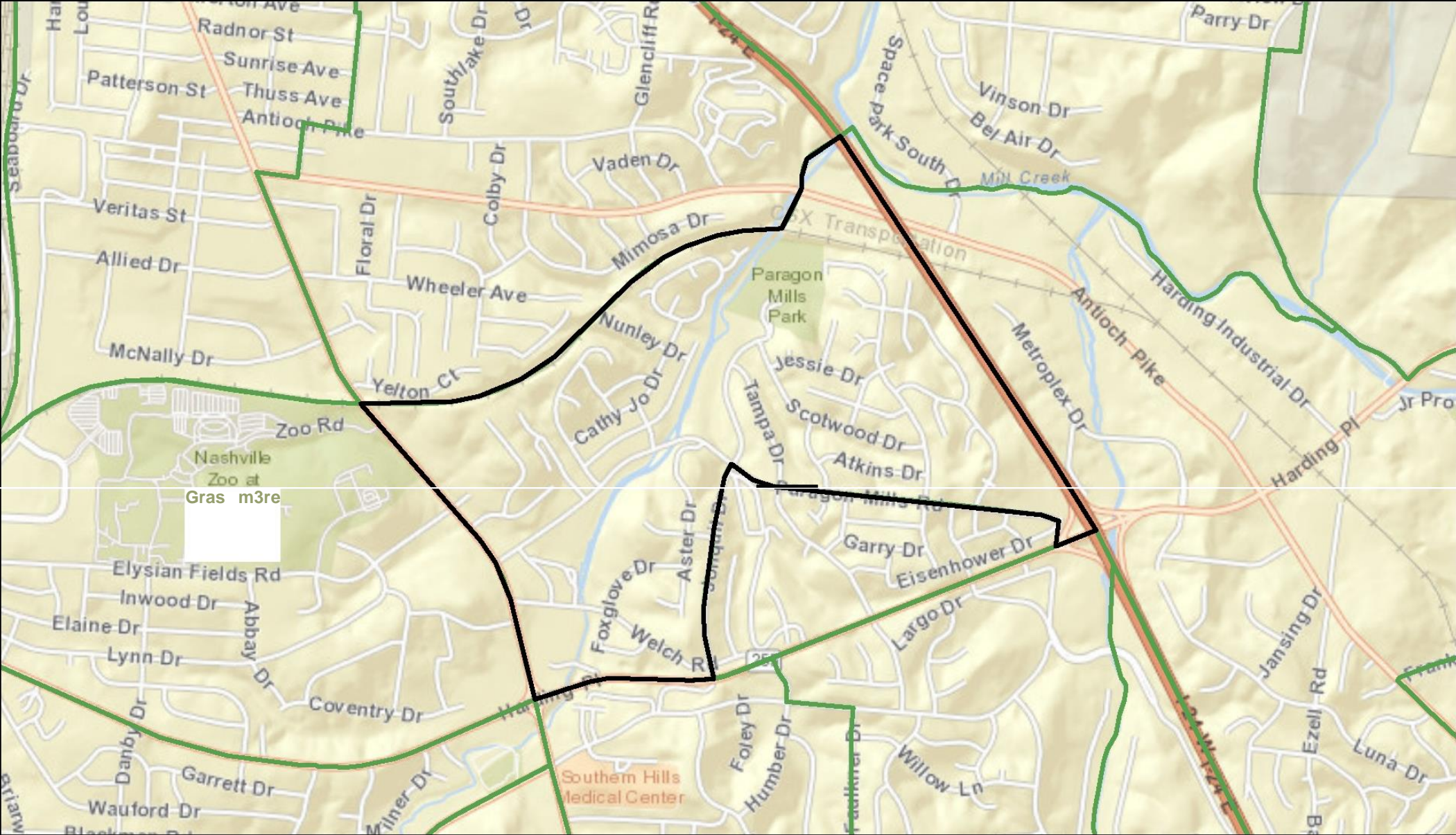
Override 1

Low Mod Tract



Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTom, MapmyIndia, © OpenstreetMap contributors, and the GIS User Community

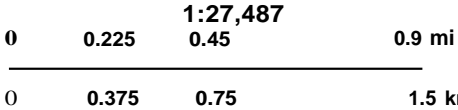
CPO Maps - Census Tract 019006



April 6, 2015

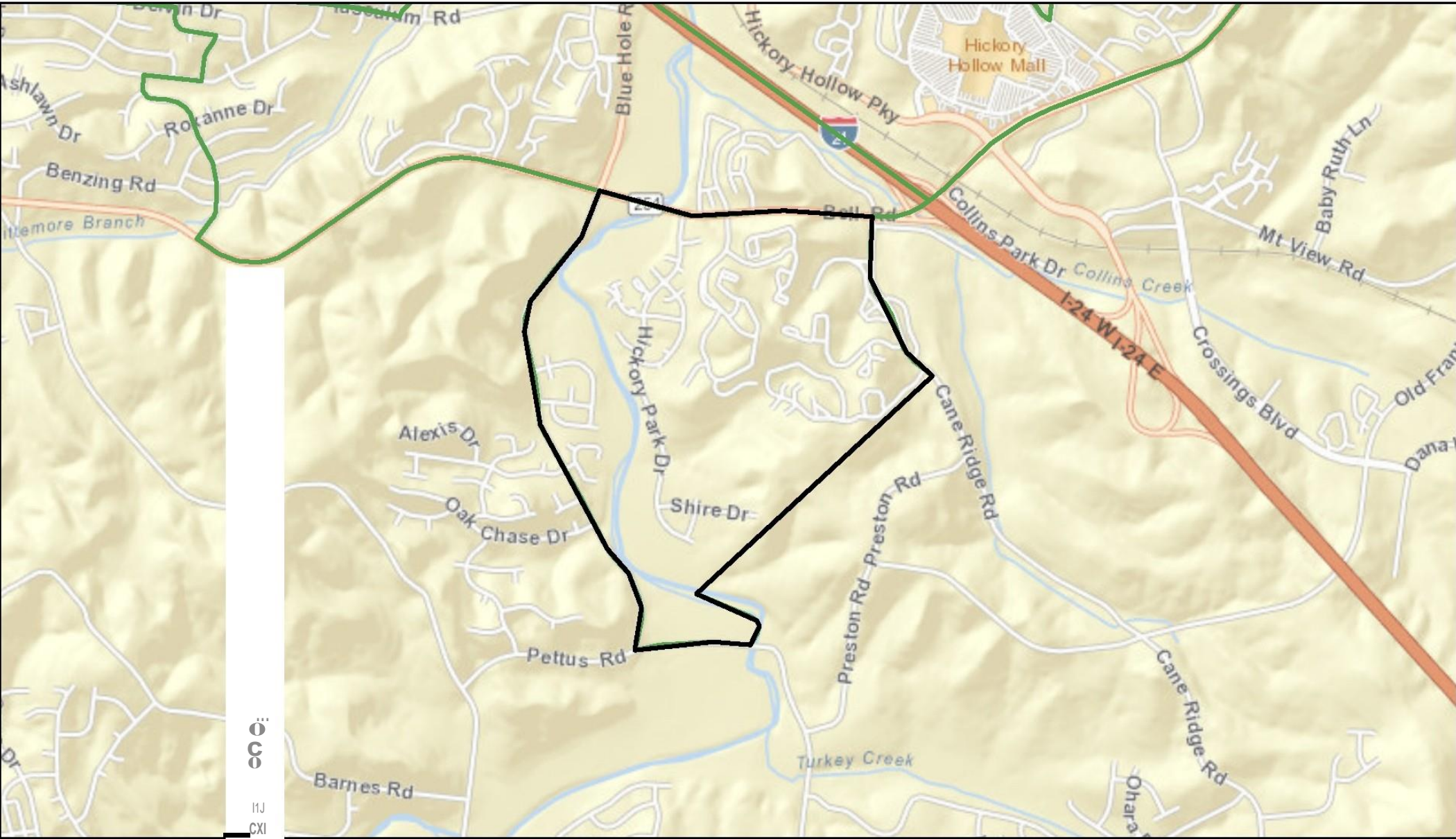
Override 1

Low Mod Tract



Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTom, MapmyIndia, © OpenstreetMap contributors, and the GIS User Community

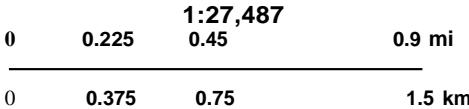
CPO Maps- Census Tract 019118



April 6, 2015

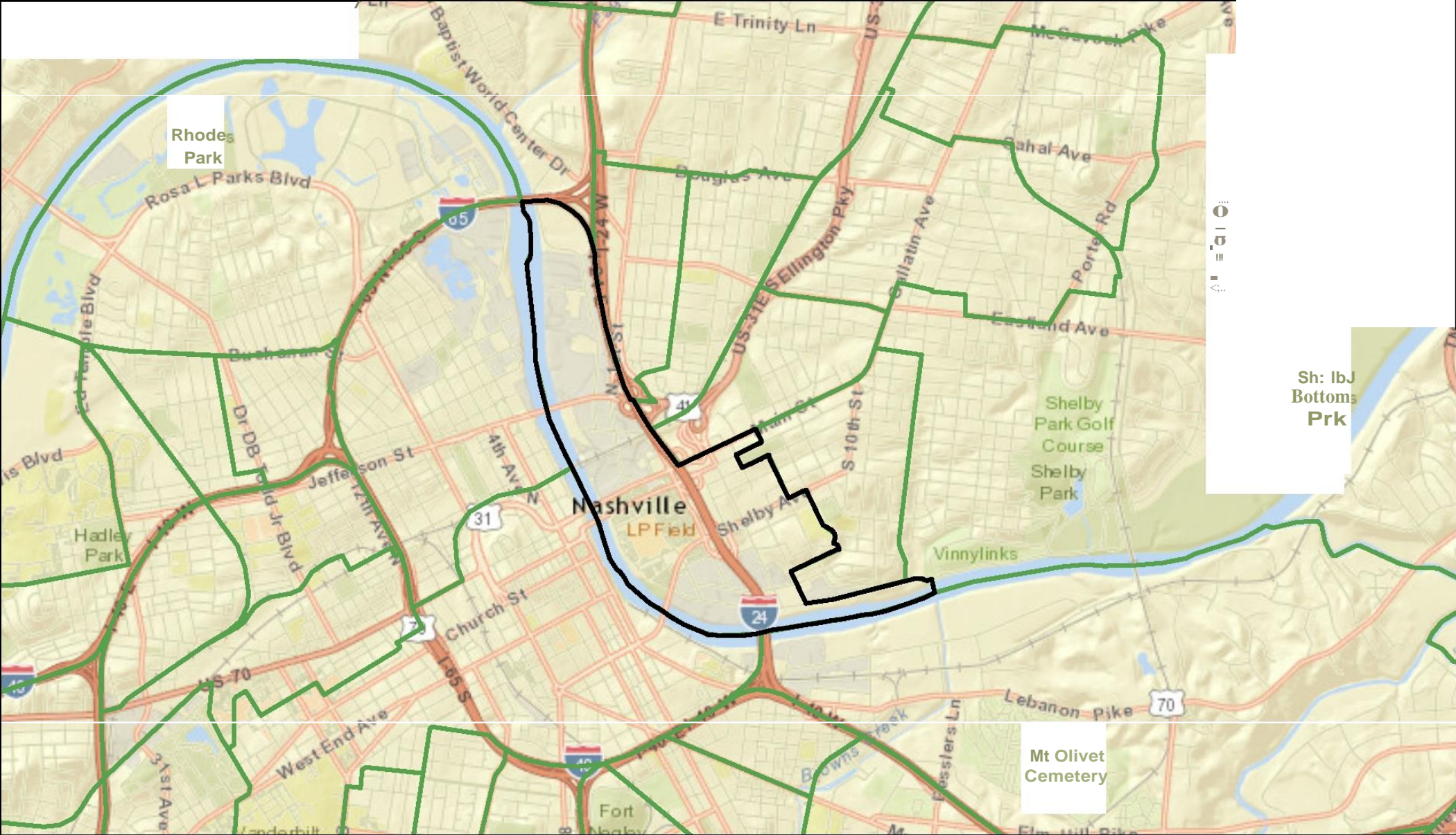
Override 1

Low Mod Tract



Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTom, MapmyIndia, © OpenstreetMap contributors, and the GIS User Community

CPO Maps - Census Tract 019300



April 6, 2015

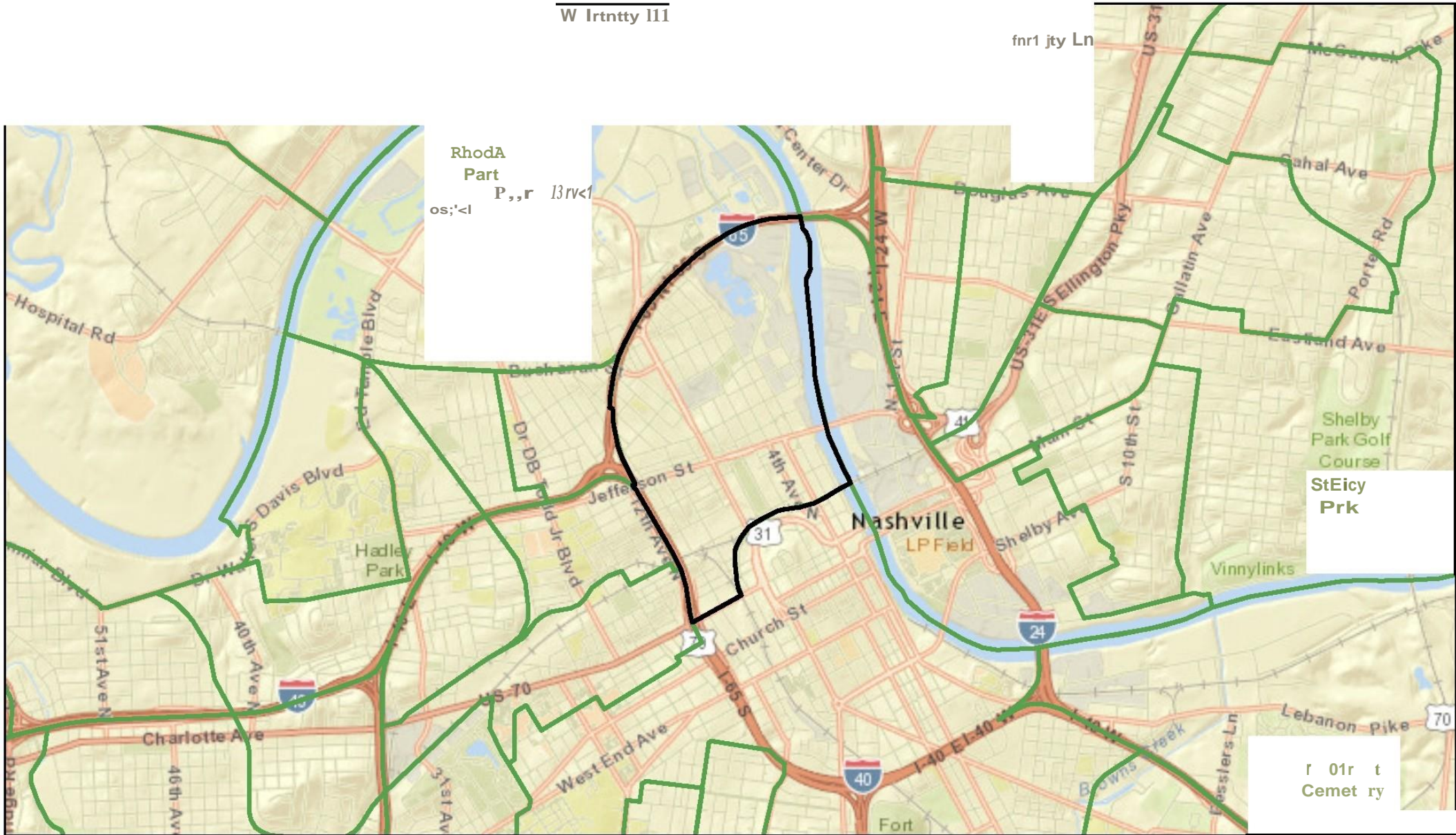
Override 1

Low Mod Tract

1:54,974
0 0.475 0.95 1.9 mi
0 0.75 1.5 3 km
Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTom, MapmyIndia, © OpenstreetMap contributors, and the GIS User Community

CPO Maps - Census Tract 019400

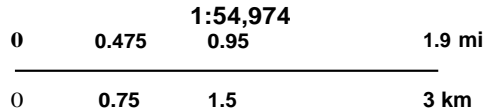
W Irtnnty III



April 9, 2015

Override 1

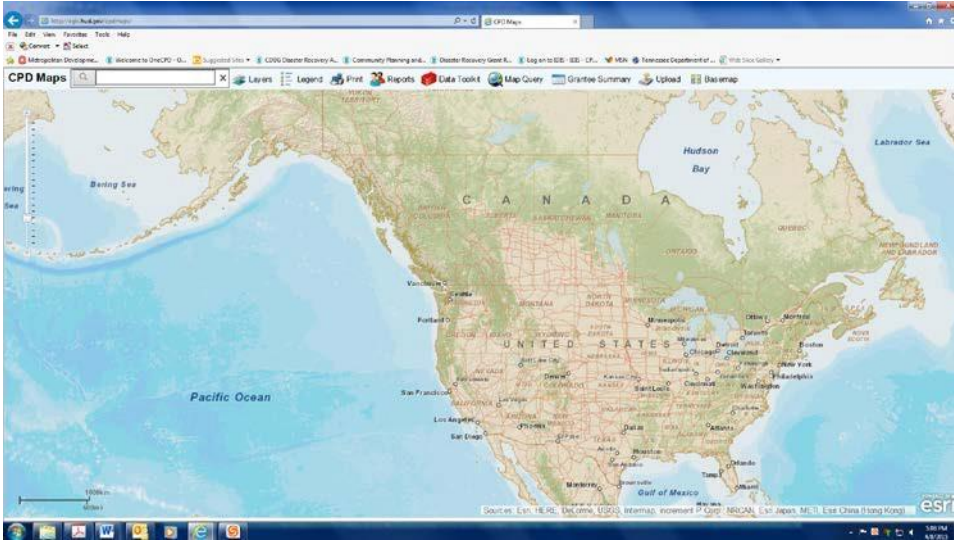
Low Mod Tract



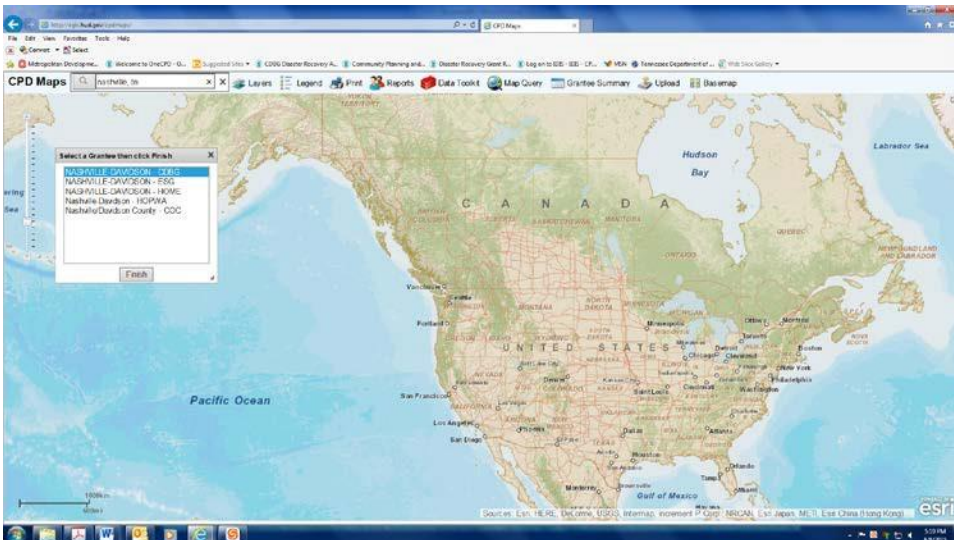
Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTom, MapmyIndia, © OpenstreetMap contributors, and the GIS User Community

Additional Census Tract Information

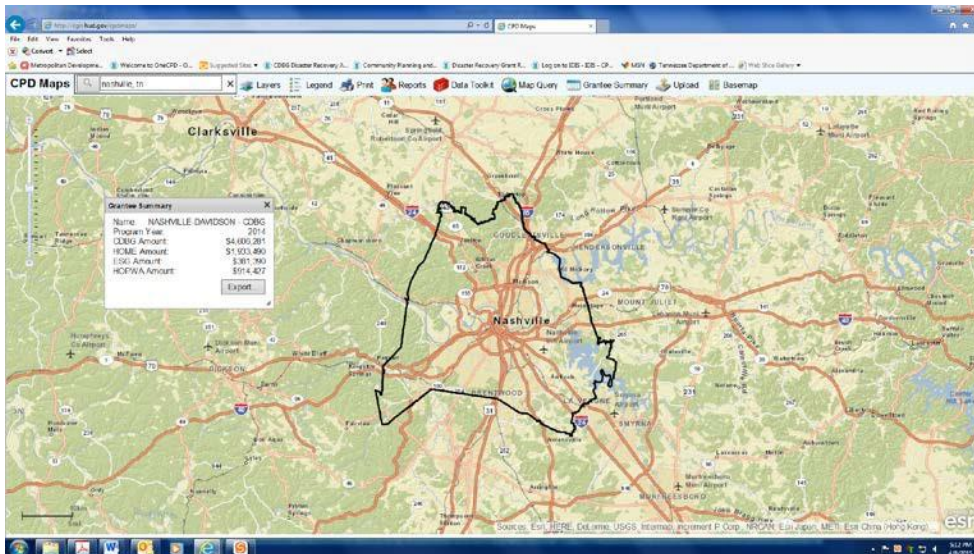
1. Go to: <http://egis.hud.gov/cpdmaps/>.
2. In the search box, type Nashville, TN and hit “Enter”.



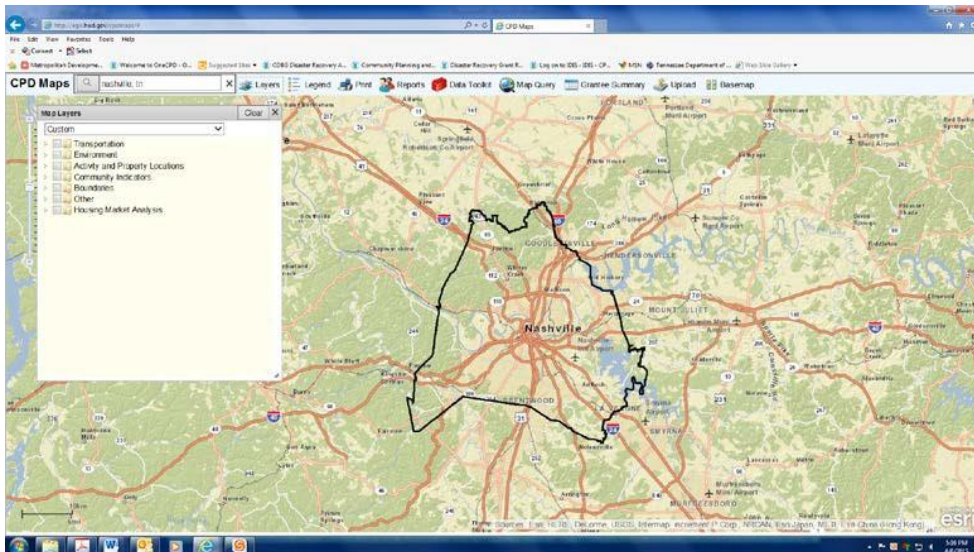
3. Under “Select a Grantee then click Finish”, select Nashville-Davidson CDBG. Click “Finish”.



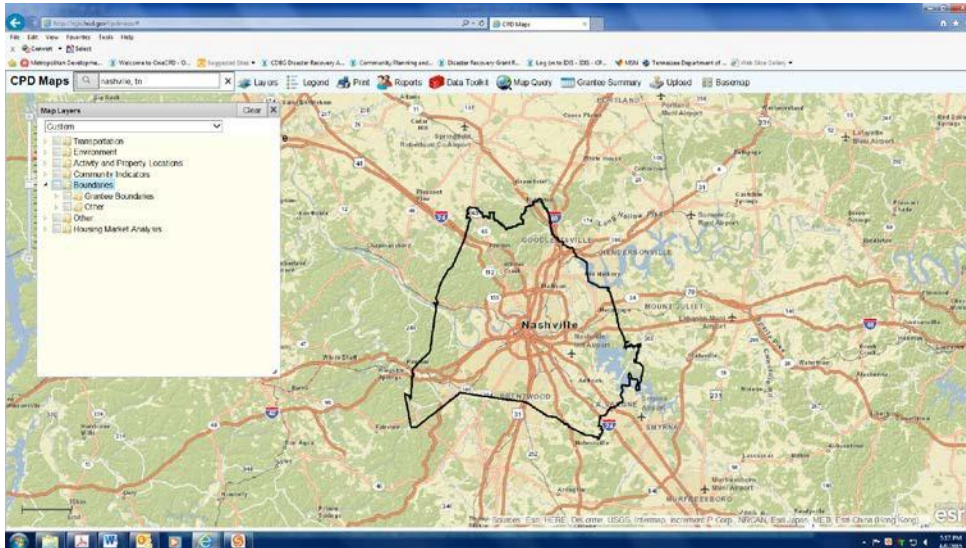
4. A map of Davidson County will appear. Close the “Grantee Summary” box.



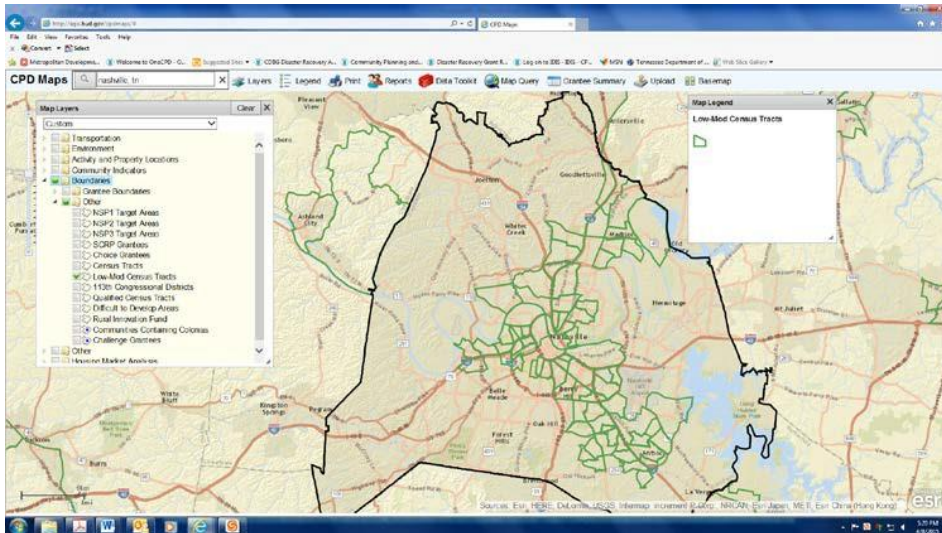
5. Click on the “Layers” icon on the far left. In the box that appears, select “Boundaries”.



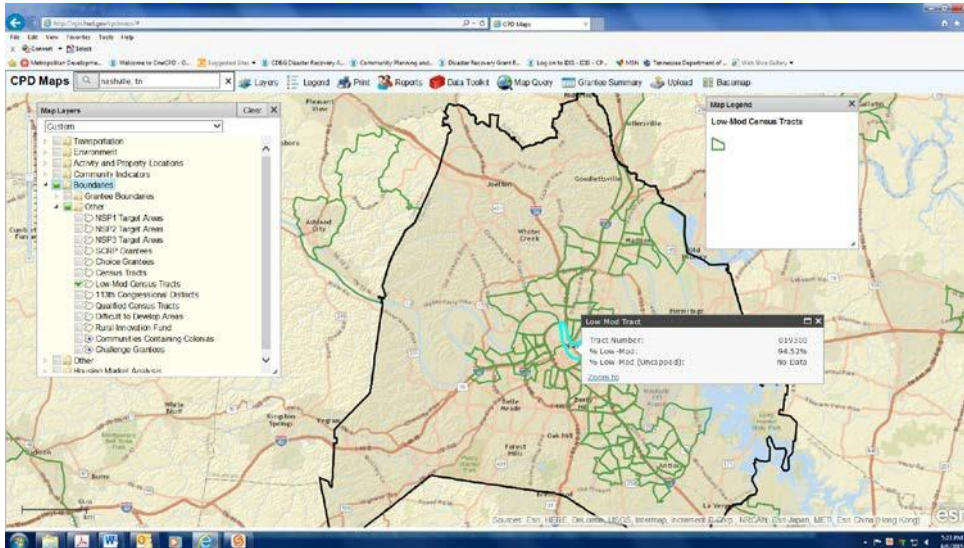
6. Under “Boundaries”, select “Other”.



7. Under “Other”, select “Low-Mod Census Tracts”. *Note: Use the scale on the far left side of the page to adjust the size of the map.*



- To get specific information about a census tract that has a green border, place your cursor inside the tract's border and click. Information about the tract will appear in a pop-up window.

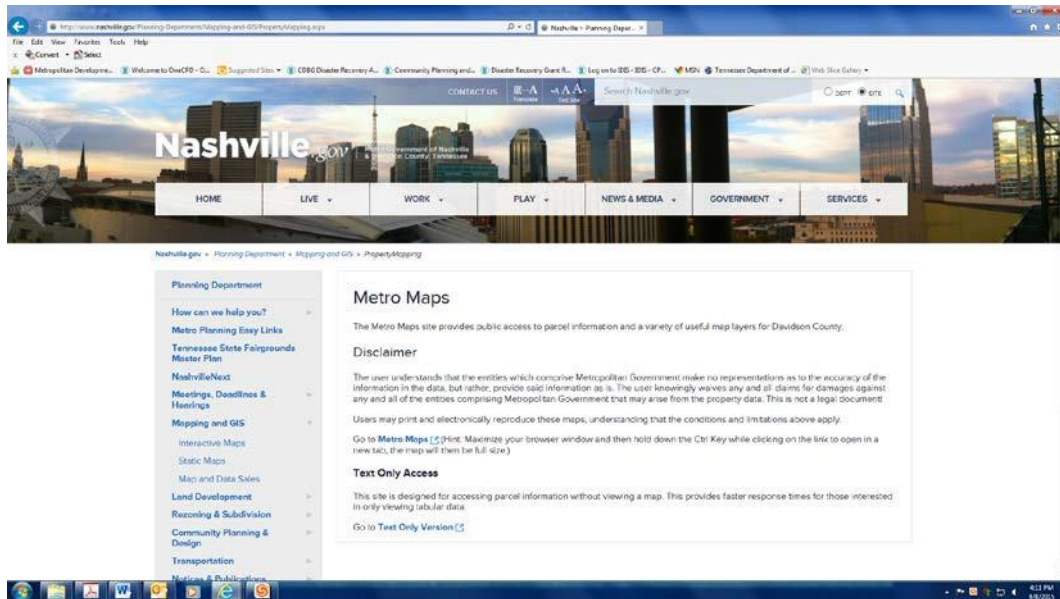


- For more information about this mapping tool, go to: <https://www.hudexchange.info/resources/documents/CPD-Maps-Desk-Guide.pdf>.

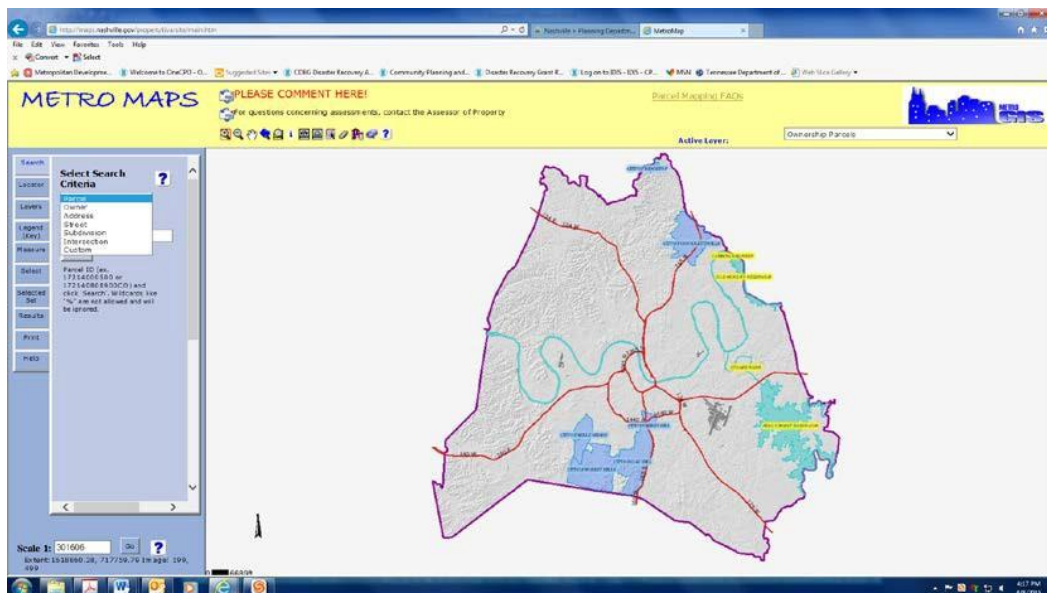
EXHIBIT 5

HOW TO DETERMINE YOUR CENSUS TRACT

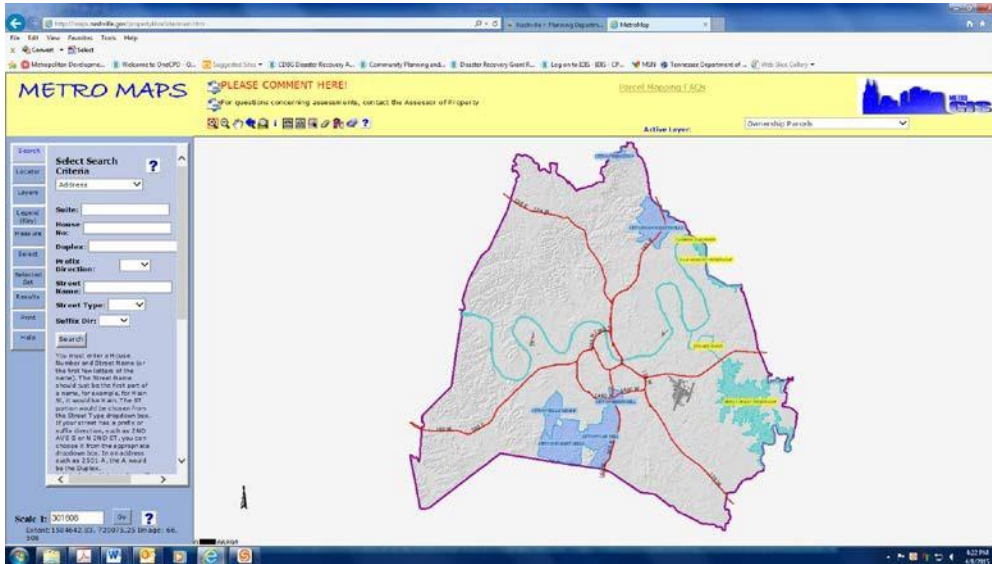
1. Go to: <http://www.nashville.gov/Planning-Department/Mapping-and-GIS/PropertyMapping.aspx>.
2. Click on: **Metro Maps** in the sentence that says, “Go to **Metro Maps**”.



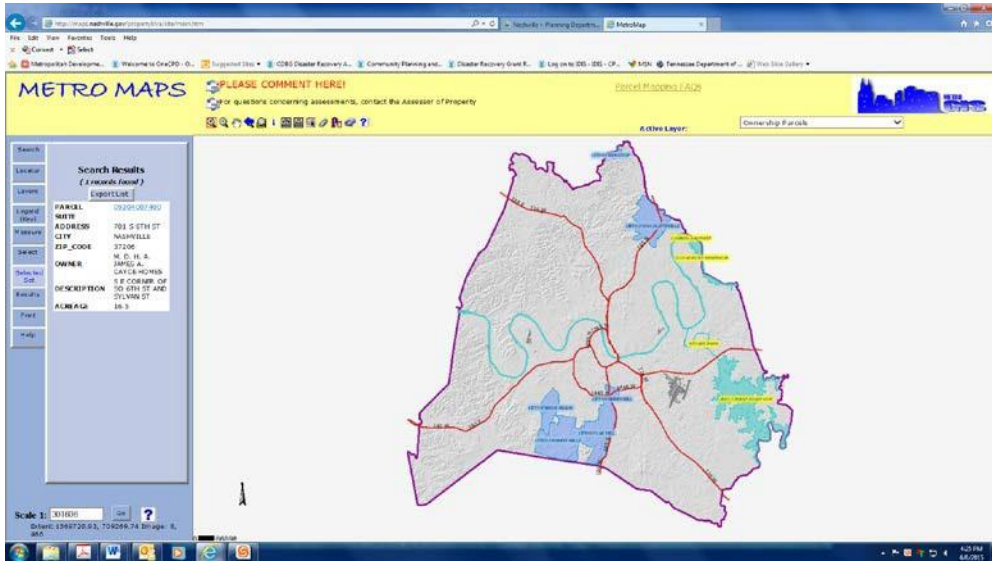
3. In the drop-down box under Select Search Criteria, select Address.



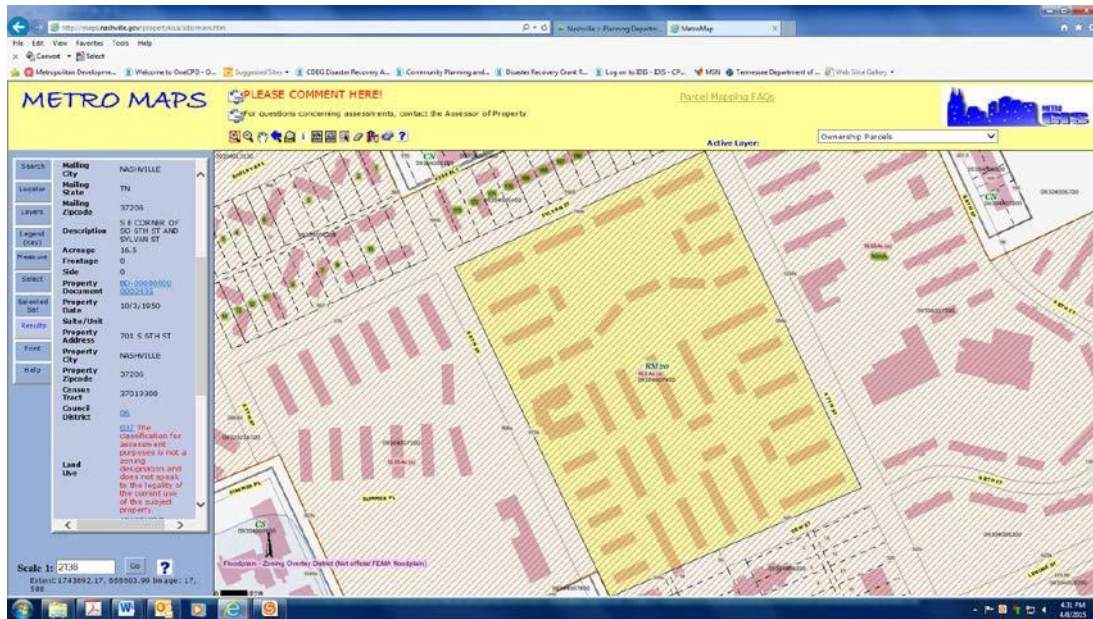
4. Enter your address, and then click on Search.



5. Under Search Results, click on the highlighted parcel number. *NOTE: The address for MDHA's central office is used as an example.*



- Under View More Parcel Data, scroll down until you find the Census Tract. The **last six numbers** identify your Census Tract.



- If you need assistance, contact the Community Development Department at 615-252-8505.