

METROPOLITAN NASHVILLE-DAVIDSON COUNTY, TENNESSEE

**SUBSTANTIAL AMENDMENT 2  
TO THE  
2013-2018 CONSOLIDATED PLAN  
FOR  
HOUSING AND COMMUNITY DEVELOPMENT**

**AND**

**2016-2017 ANNUAL UPDATE FOR  
PROGRAM YEAR FOUR  
For the period April 1, 2016 – March 31, 2017**

**Prepared by:**

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Nashville, Tennessee 37206



**On Behalf of:**

The Metropolitan Government of  
Nashville and Davidson County

Updated May 2, 2016



**2016-2017 Annual Update to the 2013-2018 Consolidated Plan (2016 Action Plan)  
Program Year Four**

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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 and is estimated to be 668,347 in 2014. The 2010 population of the entire 13-county Nashville metropolitan area was 1,589,934 – making it the largest Metropolitan Statistical Area in the state.

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. Metro Nashville is 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.

#### **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 covers the period from April 1, 2013 to March 31, 2018. 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. Concurrent with this Action Plan, MDHA has prepared Substantial Amendment 2 to the Consolidated Plan to allow 2016 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. This Annual Update covers the period April 1, 2016 to March 31, 2017 and constitutes Program Year Four. The allocations for the 2016 program year are shown in the table below:

<b>2016 Formula Allocations</b>	
CDBG	\$4,559,221
HOME	\$1,819,757
ESG	\$ 416,420
HOPWA	\$ 942,082
<b>TOTAL</b>	<b>\$7,737,480</b>

The Annual Update is due to HUD forty-five (45) days prior to the beginning of the program year; for Metro Nashville, the Plan is usually due no later than February 14 of each year. However, as directed by HUD per CPD Notice 16-01, MDHA could not submit its plan until it received a Notice of Allocations from HUD for the 2016 Program Year. (See Exhibit 1.) In order to provide the public with a Plan that includes actual allocations instead of estimates, MDHA elected to begin the public comment period after receiving the Notice of 2016 allocations on February 16, 2016 and after consulting with Metro on proposed budgets. Although the CPD Notice required plans to be submitted within sixty (60) days of receiving the Notice, MDHA requested and received an extension to submit the Plan by May 31, 2016, to accommodate the public comment period, approval by the MDHA and Metro Council, and certification by the Metro Mayor. (See Exhibit 2.)

Substantial Amendment 2 is prepared to allow 2016 ESG funds to be used for Prevention Activities.

**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.

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

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. More information about each activity is available in Section AP-35.

<b>OBJECTIVE 1: SUITABLE LIVING ENVIRONMENT</b>	
<b>Outcomes</b>	<b>Related Activities</b>
<i>Availability/Accessibility</i>	<ul style="list-style-type: none"> <li>• Emergency Shelter &amp; Transitional Housing</li> <li>• Street Outreach</li> <li>• Rapid Re-Housing</li> <li>• Homeless Prevention</li> <li>• Housing Opportunities for Persons with AIDS</li> <li>• Services for the Homeless</li> </ul>
<i>Sustainability</i>	<ul style="list-style-type: none"> <li>• Infrastructure Improvements (Residential)</li> <li>• Neighborhood Facilities</li> <li>• Healthy Food Initiatives</li> <li>• Summer Youth Programs</li> <li>• Nonprofit Capacity Building</li> <li>• Planning Activities</li> <li>• Acquisition</li> </ul>

<b>OBJECTIVE 2: DECENT HOUSING</b>	
<b>Outcomes</b>	<b>Related Activities</b>
<i>Affordability</i>	<ul style="list-style-type: none"> <li>• Homeowner &amp; Rental Rehabilitation</li> <li>• Affordable Housing Development</li> <li>• Downpayment Assistance</li> </ul>
<i>Availability/Accessibility</i>	<ul style="list-style-type: none"> <li>• Fair Housing</li> </ul>
<b>OBJECTIVE 3: ECONOMIC OPPORTUNITIES</b>	
<b>Outcomes</b>	<b>Related Activities</b>
<i>Sustainability</i>	<ul style="list-style-type: none"> <li>• Microenterprise Assistance</li> <li>• Commercial Rehab</li> <li>• Business Technical Assistance</li> </ul>

### 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/2015/06/2014-CAPER\\_Nashville-Davidson-Co..pdf](http://www.nashville-mdha.org/wp-content/uploads/2015/06/2014-CAPER_Nashville-Davidson-Co..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 2014 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 July 2015, HUD conducted a monitoring review of the CDBG, HOPWA and NSP1 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 2016 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 2016 Action Plan and is summarized in Appendix D.

The Public Comment Period for the 2016 Action Plan began on March 21, 2016 and concluded at 4:00 p.m. on April 28, 2016. During the public comment period, members of the public were invited to share their comments at three public hearings. Details regarding the public comment period and public hearings were provided in the Public Notice, which is included in Appendix E. The Public Notice was 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 Mayor Barry, Vice Mayor Briley, and Members of Metro Council; posted on MDHA's website and social media outlets and at MDHA properties; and distributed at the Tennessee Fair Housing Matters Conference. The first public hearing was televised multiple times on the local government access channel, Metro 3, and was 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, will be included in Appendix F.



**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 will be provided in Appendix F.

**7. Summary**

This 2016 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 2016-2017 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.

<b>Agency Role</b>	<b>Name</b>	<b>Department/Agency</b>
Lead Agency for preparing Consolidated Plan	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 2016 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 2016 Action Plan should be directed as follows and submitted or postmarked by 4:00 p.m., central time, on Thursday, April 28, 2016:

- By mail: MDHA Community Development Department  
Attn: Consolidated Plan  
P. O. Box 846  
Nashville, TN 37202
- Electronically: [consolidatedplan@nashville-mdha.org](mailto: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](mailto:ahubbard@nashville-mdha.org).

## **AP-10 Consultation – 91.100, 91.200(b), 91.215(I)**

### **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 amount 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 2016 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 2016 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 D. 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 11 voting members, including advocates, persons who have experienced homelessness, and elected officials, and 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 implement a coordinated and focused approach to ending homelessness and to develop measurable objectives.

**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 CoC Lead Agency for Nashville-Davidson County, and as the Collaborative Applicant, coordinates the submission of over 25 local project applications each year, 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. Since 2008, MDHA has also been home to the CoC's Homeless Management Information System (HMIS).

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 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 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.

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 2015 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 2015 PIT count.

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 is expected to be released in the late March 2016 and will be a guide for developing or enhancing strategies to end homelessness.

**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 lead agency for the CoC process and HMIS, MDHA is responsible for the administration of the ESG program. 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 2016 formula funding. In particular, participants were asked to prioritize activities to address homelessness and subpopulations to be served by homeless assistance programs. In addition, consideration was given to HUD's encouragement of allocating ESG for rapid re-housing. After further discussion with MHC staff and providers, a need to allocate funds for prevention was identified. In conjunction with this Action Plan, MDHA has prepared Substantial Amendment 2 to allow ESG to be used for eligible prevention activities.

With two decades of compiling and submitting the CoC application and over seven years operating the city's HMIS, MDHA has extensive experience with two key CoC responsibilities: (1) as Collaborative Applicant, MDHA applied for 2015 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 quality standards for ESG recipients to gauge the quality of data for reported performance outcomes. In the next year, MDHA will examine combining the ESG and CoC matrices 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.

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 two 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 26 transitional and permanent housing projects. During 2016, MDHA will work to integrate HMIS data with data required by HHS for homeless youth (RHYMIS) and persons struggling with chronic mental illness (PATH).

**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 2016 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 2, 2015, 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 list the top three 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 prioritize needs for fair housing education.

Participants included representatives from Community Homeowner Associations; affordable housing advocates; housing developers/providers some which are certified as Community Housing Development Organizations (CHDOs); Metropolitan Nashville Homelessness Commission; realtors; private lenders; and non-profit service providers.

- *Non-housing community development consultation:* Held on the evening of September 29, 2015, 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; representatives of Bordeaux Hill Neighborhood Association; Martha O'Bryan Center; Metro Social Services; Metropolitan Nashville-Davidson County Parks; Trevecca Urban Farm; Family Children's Service; and Tennessee State University Entrepreneur Center.

- *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. A special consultation on the needs of public

housing residents for the 2016 Action Plan was held in conjunction with the MDHA weekly staff meeting on October 19, 2015 where the Director of Community Development provided an overview of activities to address these needs during the current program year and eligible uses of CDBG funds. Public Housing specific 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 October 1, 2015, 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 ESG and HOPWA funds. 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 a clinic that provides direct services for HIV clients; a funder and planning facilitator for HIV services; a representative from the Metropolitan Homelessness Commission; and subrecipients of ESG and HOPWA funds.

- Consultation with metro government agencies: MDHA hosted a luncheon in the MDHA Collaboration Center on January 6, 2016 for representatives from the Mayor’s offices of Economic and Community Development (ECD), Economic Opportunity and Empowerment (EOE); and Neighborhoods and Community Engagement (NCE) to provide an overview of the 2016 Action Plan and obtain their input on program priorities. There were 6 representatives in attendance. The attendees viewed a short power point presentation detailing the steps taken for the Action Plan thus far as well as a review of the topics and responses from the prior consultations. The following topics were discussed: Economic Development; Section 108 Loans; CDBG Homeowner and Rental Rehabilitation programs; distribution of funds and nonprofit organizational capacity; Citizen Participation; Summer Youth programs; HOME programs; and CHDO capacity building. The representatives emphasized the need for broad-based outreach and utilizing their networks to publicize the Plan.

In addition, MDHA staff has held further discussion with the Mayor’s Infrastructure Team, EOE, NCE, and MHC and has coordinated with these groups and the Metro Finance Department on proposed activity budgets.

Input received from all the consultations and meetings were considered when formulating funding priorities for the 2016 Action Plan.

1	<b>Agency/Group/Organization</b>	MDHA
	<b>Agency/Group/Organization Type</b>	PHA
	<b>What section of the Plan was addressed by Consultation?</b>	All
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Prior to drafting the 2016 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	<b>Agency/Group/Organization</b>	Metro Homelessness Commission
	<b>Agency/Group/Organization Type</b>	Other Government-Local
	<b>What section of the Plan was addressed by Consultation?</b>	Anti-Poverty Strategy Public Housing Needs Homelessness Needs Homelessness Strategy



	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Prior to drafting the 2016 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	<b>Agency/Group/Organization</b>	Mayor's Infrastructure Team
	<b>Agency/Group/Organization Type</b>	Other government – Local
	<b>What section of the Plan was addressed by Consultation?</b>	Public Housing Needs Housing Needs Assessment Other-Non-Housing Community Development Needs Economic Development
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Prior to drafting the 2016 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	<b>Agency/Group/Organization</b>	Metro Social Services
	<b>Agency/Group/Organization Type</b>	Other Government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Other-Non-Housing Community Development Needs Economic Development Homelessness Needs Public Housing Needs

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Prior to drafting the 2016 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	<b>Agency/Group/Organization</b>	Nashville CARES
	<b>Agency/Group/Organization Type</b>	Services-Persons with HIV/AIDS
	<b>What section of the Plan was addressed by Consultation?</b>	HOPWA Strategy Homelessness Needs Public Housing Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Prior to drafting the 2016 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	<b>Agency/Group/Organization</b>	Tennessee State University
	<b>Agency/Group/Organization Type</b>	Services-Education
	<b>What section of the Plan was addressed by Consultation?</b>	Other-Non-Housing Community Development Needs Economic Development Homeless Needs

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Prior to drafting the 2016 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	<b>Agency/Group/Organization</b>	Affordable Housing Resources
	<b>Agency/Group/Organization Type</b>	Housing Services-Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Prior to drafting the 2016 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	<b>Agency/Group/Organization</b>	Catholic Charities FEP
	<b>Agency/Group/Organization Type</b>	Other – Religious Organization
	<b>What section of the Plan was addressed by Consultation?</b>	Public Housing Needs Housing Needs Services-Housing

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Prior to drafting the 2016 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	<b>Agency/Group/Organization</b>	Middle TN Workforce Board
	<b>Agency/Group/Organization Type</b>	Services-Employment
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Prior to drafting the 2016 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	<b>Agency/Group/Organization</b>	Magdalene House
	<b>Agency/Group/Organization Type</b>	Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Homelessness Needs Homelessness Strategy

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Prior to drafting the 2016 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	<b>Agency/Group/Organization</b>	Nashville Organized for Action and Hope (NOAH)
	<b>Agency/Group/Organization Type</b>	Business Leaders Civic Leaders
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Prior to drafting the 2016 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	<b>Agency/Group/Organization</b>	Bordeaux Hills RA
	<b>Agency/Group/Organization Type</b>	Neighborhood Association
	<b>What section of the Plan was addressed by Consultation?</b>	Other-Non-Housing Community Development Needs Economic Development Housing Needs Assessment

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Prior to drafting the 2016 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	<b>Agency/Group/Organization</b>	Mental Health Co-op
	<b>Agency/Group/Organization Type</b>	Health Agency Services- Health
	<b>What section of the Plan was addressed by Consultation?</b>	Homelessness Needs Homelessness Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Prior to drafting the 2016 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	<b>Agency/Group/Organization</b>	A Voice for Poverty Reduction
	<b>Agency/Group/Organization Type</b>	Civic Leaders
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Prior to drafting the 2016 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	<b>Agency/Group/Organization</b>	Madison ECD Project
	<b>Agency/Group/Organization Type</b>	Other Government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Prior to drafting the 2016 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	<b>Agency/Group/Organization</b>	City Road Chapel UMC
	<b>Agency/Group/Organization Type</b>	Other-Religious Organization
	<b>What section of the Plan was addressed by Consultation?</b>	Public Housing Needs Housing Needs Assessment

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Prior to drafting the 2016 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	<b>Agency/Group/Organization</b>	Metro Parks Services
	<b>Agency/Group/Organization Type</b>	Other Government-Local
	<b>What section of the Plan was addressed by Consultation?</b>	Other-Non-Housing Community Development Needs Economic Development
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Prior to drafting the 2016 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	<b>Agency/Group/Organization</b>	Park Center
	<b>Agency/Group/Organization Type</b>	Services – Homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Homelessness Strategy Homelessness Needs



	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Prior to drafting the 2016 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	<b>Agency/Group/Organization</b>	Mayor's Office of Economic and Community Development
	<b>Agency/Group/Organization Type</b>	Other Government-Local
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Economic Development Other-Non-Housing Community Development Needs Homelessness Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Prior to drafting the 2016 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	<b>Agency/Group/Organization</b>	Mayor's Office of Economic Opportunity And Empowerment
	<b>Agency/Group/Organization Type</b>	Other Government-Local
	<b>What section of the Plan was addressed by Consultation</b>	Housing Need Assessment Public Housing Needs Economic Development Other-Non-Housing Community Development Needs Homelessness Strategy

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Prior to drafting the 2016 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	<b>Agency/Group/Organization</b>	Mayor's Office of Neighborhoods and Community Engagement
	<b>Agency/Group/Organization</b>	Other Government-Local
	<b>What section of the Plan was addressed by Consultation</b>	Housing Need Assessment Public Housing Needs Economic Development Other-Non-Housing Community Development Needs Homelessness Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Prior to drafting the 2016 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	<b>Agency/Group/Organization</b>	Martha O'Bryan Center
	<b>Agency/Group/Organization Type</b>	Services- Education Services- Children
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Housing Community Development Strategy Economic Development Strategy

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Prior to drafting the 2016 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	<b>Agency/Group/Organization</b>	Family and Children's Services
	<b>Agency/Group/Organization Type</b>	Services-Children
	<b>What section of the Plan was addressed by Consultation?</b>	Non-housing Community Development Strategy Economic Development Strategy Homelessness Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Prior to drafting the 2016 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	<b>Agency/Group/Organization</b>	Urban Housing Solutions
	<b>Agency/Group/Organization Type</b>	Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs HOPWA Strategy

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Prior to drafting the 2016 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	<b>Agency/Group/Organization</b>	ABL Realty Services
	<b>Agency/Group/Organization Type</b>	Business Leaders
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Prior to drafting the 2016 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	<b>Agency/Group/Organization</b>	Trevecca Urban Farm
	<b>Agency/Group/Organization Type</b>	Services - Education
	<b>What section of the Plan was addressed by Consultation?</b>	Non-housing Community Development Strategy Economic Development Strategy

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Prior to drafting the 2016 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	<b>Agency/Group/Organization</b>	Habitat for Humanity Greater Nashville
	<b>Agency/Group/Organization Type</b>	Services-Fair Housing Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Prior to drafting the 2016 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	<b>Agency/Group/Organization</b>	Oasis Center
	<b>Agency/Group/Organization Type</b>	Services – Housing Services – Homeless Services - Children
	<b>What section of the Plan was addressed by Consultation?</b>	Homelessness Needs- Families with Children Homelessness Strategy

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Prior to drafting the 2016 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	<b>Agency/Group/Organization</b>	Temple Church ACT Center
	<b>Agency/Group/Organization Type</b>	Other – Religious Organization
	<b>What section of the Plan was addressed by Consultation?</b>	Homelessness Needs Homelessness Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Prior to drafting the 2016 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	<b>Agency/Group/Organization</b>	Vanderbilt USN
	<b>Agency/Group/Organization Type</b>	Services - Education
	<b>What section of the Plan was addressed by Consultation?</b>	HOPWA Strategy Homeless Needs-Persons with HIV/AIDS

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Prior to drafting the 2016 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	<b>Agency/Group/Organization</b>	United Way
	<b>Agency/Group/Organization Type</b>	Regional Organization
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs Homelessness Strategy HOPWA Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Prior to drafting the 2016 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	<b>Agency/Group/Organization</b>	TN Department of Health
	<b>Agency/Group/Organization Type</b>	Other Government - State
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs HOPWA Strategy

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Prior to drafting the 2016 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	<b>Agency/Group/Organization</b>	Needlink Nashville
	<b>Agency/Group/Organization Type</b>	Business Leaders
	<b>What section of the Plan was addressed by Consultation?</b>	Homelessness Needs Homelessness Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Prior to drafting the 2016 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.

**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"> <li>-Setting agendas for full CoC meetings</li> <li>-Project monitoring</li> <li>-Determining project priorities</li> <li>-Providing final approval for the CoC application submission.</li> </ul>
Nashville Next	Metro Planning Department	-Adopted plan for growth and preservation; addressing barriers to affordable housing
Nashville-Davidson Metro Housing Policy & 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
2015 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	Metro Homelessness Commission	-Coordinating strategy to end chronic and Veteran homelessness

**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 2016 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. Comments submitted during the public comment period will be considered and incorporated to the extent possible into the final draft.

For the purpose of the 2016 Action Plan, the public comment began on March 21, 2016 and concluded at 4:00 p.m. on April 28, 2016. During the public comment period, members of the public were invited to share their comments at three public hearings. Details regarding the public comment period and public hearings are provided in the Public Notice included in Appendix E.

The Public Notice was advertised in *The Tennessean*, *The Tribune*, and translated in Spanish in *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](http://www.nashville-mdha.org)) and at every public library branch in the county. 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 Mayor Barry, 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: Facebook, Twitter, LinkedIn, and Google+. 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 first public hearing, held on April 6, 2016, 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	<a href="http://www.nashville-mdha.org">www.nashville-mdha.org</a>
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 Hearings	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: First Public Hearing Broadcast multiple times on Metro Channel 3	Non-targeted/broad community	N/A	N/A	N/A	
12	Other: Video of First Public Hearing available on YouTube	Non-targeted/broad community	N/A	N/A	N/A	<a href="https://www.youtube.com/watch?v=BWA0vx1MIGE">https://www.youtube.com/watch?v=BWA0vx1MIGE</a>
13	Other: Posting at public library branches	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 2016 Allocations for CPD formula grants on February 16, 2016. Allocations for Metro Nashville for HOME, ESG, and HOPWA reflected slight increases over the 2015 Allocations; however, the 2016 allocation for the CDBG program was approximately \$66,638 less than the 2015 allocation. The table below shows the ten-year allocation history for the four CPD grants.

	<b>CDBG</b>	<b>HOME</b>	<b>ESG</b>	<b>HOPWA</b>
2007	\$ 5,104,777.00	\$ 3,113,721.00	\$ 217,772.00	\$ 757,000.00
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
<b>2016</b>	<b>\$ 4,559,221.00</b>	<b>\$ 1,819,757.00</b>	<b>\$ 416,420.00</b>	<b>\$ 942,082.00</b>

Total Expected Resources for the 2016 Program Year include the annual allocation, estimated program income (for CDBG and HOME) 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 \$300,000 in CDBG program income and \$230,000 in HOME program income during PY 2016. 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 2015 CDBG funds will be reprogrammed; no other grant funds will be reprogrammed.

Of the Expected Resources, a minimum of 15% of the 2016 HOME allocation (\$272,963.55) will be set aside for projects undertaken by eligible Community Housing Development Organizations (CHDOs).

<b>2015 Reprogrammed CDBG Activities</b>				
<b>Activity</b>	<b>2015 Budget</b>	<b>Amount Expended</b>	<b>Amount Reprogrammed</b>	<b>Comments</b>
Section 108 Loan Repayment	\$505,299.00	\$499,580.00	\$ 5,719.00	Over-budgeted; reprogrammed to H/O Rehab
Downpayment Assistance	\$ 50,000.00	\$ -	\$ 50,000.00	Will utilize HOME funds; reprogrammed to Rental Rehab
Shelter Rehab	\$500,000.00	\$170,000.00	\$ 330,000.00	Lack of demand; reprogrammed to Neighborhood Facilities & Infrastructure
Fair Housing	\$ 50,000.00	\$ 35,765.00	\$ 14,235.00	Contract under budget; reprogrammed to H/O Rehab
Healthy Food Initiatives	\$ 50,000.00	\$ -	\$ 50,000.00	Subrecipient for 2015 program cannot perform & will fund 2016 program with carryforward; \$10,000 reprogrammed to H/O Rehab & \$40,000 reprogrammed to Services for the Homeless
<b>Total</b>	<b>\$1,155,299.00</b>	<b>\$705,345.00</b>	<b>\$ 449,954.00</b>	

The Expected Amount Available for the Remainder of the ConPlan period reflects flat allocation and program income levels for remaining program year (Program Year Five).

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 80% 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 \$325,674.73 to serve 33 households during the period July 1, 2015 thru June 30, 2016 and a total LIHEAP award of \$40,613.90.

With a program year beginning on April 1, Metro Nashville is considered an “early grantee”. In recent years, this places Nashville in a bind when Congress does not pass a budget by October 1. Instead of receiving funds by the program year start date, MDHA has not received funds until July or August – into the second quarter of the program year. When this occurs, MDHA must incur pre-award costs as of April 1, but must also limit the

number of new projects that can begin due to the limit on pre-award costs that can be incurred. MDHA has begun the conversation with HUD to eventually move the program year to July 1 through June 30. Doing so requires careful planning; however, this change would not only minimize the impact of a delayed Federal budget, it aligns with Metro Nashville's and the State of Tennessee's fiscal years. Since MDHA does not expect to receive the 2016 allocation until July – at the earliest – many activities are proposed to begin on July 1, instead of April 1.

**Priority Table**

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				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.	\$4,559,221.00	\$ 300,000.00	\$1,729,954.00	\$6,589,175.55	\$4,859,221.00	Activities that benefit LMI households (≤80% AMI) or LMI neighborhoods (≤65% AMI)
HOME	Public-federal	Admin; Homebuyer Programs; Homeowner Rehab; Rental Projects	\$1,819,757.00	\$ 230,000.00	\$ 755,000.00	\$ 2,804,757.00	\$2,049,757.00	Funding for affordable rental housing (≤60%) or homeownership (≤80%)
ESG	Public-federal	Admin; Emergency Shelter; HMIS; Street Outreach; Rapid Re-housing; Prevention	\$ 416,420.00			\$ 416,420.00	\$ 416,420.00	Homeless Assistance Programs



HOPWA	Public-federal	Admin; Facility-based Housing Operations; STRMU; Supportive Services	\$ 942,082.00			\$ 942,082.00	\$ 1,884,164.00	Assistance for persons with HIV/AIDS and their families
Other: Continuum of Care	Public-federal	Permanent housing placement for homeless	\$3,479,196.00			\$3,479,196.00	\$3,479,196.00	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**

In its Notice of Allocations issued on February 16, 2016, HUD encouraged grantees to effectively plan and implement programs that leverage these 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 has leveraged funding through the City's Housing Trust Fund to award funds to nonprofits for affordable housing development. For example, in 2015, MDHA leveraged approximately \$1.5 million in HOME funds with \$500,000 from the local Barnes Housing Trust Fund for projects that will create 60 affordable housing units. In 2016, MDHA will make additional HOME funds available for this effort.

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. 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, MDHA awarded \$2.7 million in HOME funds to create 26 permanent supportive housing units for the homeless. For one of these 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, 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 17 lots were awarded to 3 nonprofit organizations through the Barnes and HOME RFA in 2015 to be used to create 52 units of affordable housing. MDHA and Metro Government are in the process of developing procedures to effectively use surplus properties for affordable housing and other community needs.

## 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: \$3,062,036 HOME: \$2,599,782	Acquisition of property: 3 Rental units constructed: 40 Household Housing Unit Rental units rehabilitated: 15 Household Housing Unit Homeowner Housing Added: 6 Household Housing Unit Homeowner Housing Rehabilitated: 173 Household Housing Unit Direct Financial Assistance to Homebuyers: 6 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: \$971,840 HOPWA: \$94,200 HOME: \$204,975 ESG: \$31,000	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: \$1,550,299	Public service activities other than Low/Moderate Income Housing Benefit: 2810 Persons Assisted Facade treatment/business building rehabilitation: 3 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: \$1,005,000	Public facilities: 7

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: \$385,420	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: \$847,882	Housing for People with HIV/AIDS added: Short-term rent/mortgage /utility assistance:334 Households HIV/AIDS Housing Operations: 42 Households Supportive Services: 1,488 households

**Table 6 – Goals Summary**

## Goal Descriptions

1	<b>Goal Name</b>	Production of new units & Rehabilitation of existing
	<b>Goal Description</b>	-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): Homeowner Rehab; Rental Projects (New Construction)
2	<b>Goal Name</b>	Administration & Planning
	<b>Goal Description</b>	Administration and planning activities for CDBG, HOME, ESG, and HOPWA for MDHA and project Sponsors
3	<b>Goal Name</b>	Public Services & Economic Development
	<b>Goal Description</b>	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	<b>Goal Name</b>	Public Facilities & Public Improvements & Infrastructure
	<b>Goal Description</b>	-CDBG Activities: Infrastructure Improvements (Residential Areas); Rehab, Expansion of, or New Neighborhood Facilities and/or Homeless or Domestic Violence Shelters
5	<b>Goal Name</b>	Outreach, Emergency Shelter, Transitional Housing, Rapid Re-housing, Prevention
	<b>Goal Description</b>	-ESG Activities: Emergency Shelters (Operation & Essential Services); Street Outreach; HMIS; Rapid Re-housing, Prevention
6	<b>Goal Name</b>	Housing Opportunities for Persons with AIDS
	<b>Goal Description</b>	-HOPWA Activities: Sponsor Administration; Facility-Based Operations; Supportive Services; Short-term Rent, Mortgage & Utility Assistance

Table 7 – Goal Descriptions



**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 2016 HOME funds will result in affordable housing that will benefit approximately 47 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 leveraged with the Metro Housing Trust Fund. 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 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
25	ESG: Emergency Shelter & Transitional Housing
26	ESG: HMIS
27	ESG: Rapid Re-housing
28	ESG: Street Outreach
29	ESG: Prevention
30	HOPWA: Administration/MDHA
31	HOPWA: Facility-Based Operations
32	HOPWA: Short-term Rent, Mortgage, and/or Utility Payments (STRMU)
33	HOPWA: Supportive Services

**Table 8 – Project Information**

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

According to the 2015 Community Needs Evaluation prepared by Metro Social Services, an all-time high of 129,057 Davidson County residents living in poverty during 2014, there were many people struggling to meet their basic needs. Davidson County's poverty rate of 19.9% is higher than the 18.3% rate for Tennessee and the 15.5% rate for the United States. (The poverty guideline for one person is \$11,770, \$15,930 for two, \$20,090 for three, etc.) While the unemployment rate has decreased, many jobs pay such low wages that workers remain in poverty. Davidson County had 352,415 civilian employed residents in 2014, with half who earned less than \$28,296. More than 54,000 Davidson County households earning less than \$40,000 per year were cost burdened (paying more than 30% of household earnings for housing expenses). In 2014, 67,746 of Nashville households were cost burdened, with 30,607 households paying more than 50% of their income for housing, 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 and Feasibility Study prepared in December 2015 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. While Nashville's affordable housing gap grows wider, funding for the HOME program continually shrinks (i.e., has been cut by 53% since 2005). These precious dollars provide a crucial gap in making housing affordable.

Proposed activities 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 2016 Action Plan is addressing housing needs. HOME, ESG, and HOPWA were specifically created to address affordable housing and homelessness. In addition, approximately 50% of CDBG funds have 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 work closely with Metro to coordinate projects.

The following activities are limited by regulatory caps

<b>Activity</b>	<b>Cap</b>	<b>Allocation</b>	<b>Estimated PI</b>	<b>Amount to Budget</b>	<b>Amount Budgeted</b>
CDBG Admin. & Planning	20% of Allocation & PI	\$4,559,221.00	\$300,000.00	\$971,844.20	\$971,840.00
CDBG Public Services Programs	15% of Allocation	\$4,559,221.00		\$ 683,883.15	\$ 680,000.00
HOME Administration	10% of Allocation & PI	\$1,819,757.00	\$230,000.00	\$204,975.70	\$204,975.00
ESG Administration	7.5% of Allocation	\$ 416,420.00		\$ 31,231.50	\$ 31,000.00
ESG Shelter Operations & Street Outreach	60% of Allocation	\$ 416,420.00		\$249,852.00	\$218,000.00
HOPWA Administration	10% of Allocation	\$ 942,082.00		\$ 94,208.20	\$ 94,200.00

## Projects/Activities

### AP-38 Projects Summary

#### Project Summary Information

<b>1</b>	<b>Project Name</b>	<b>CDBG: Acquisition</b>
	<b>Target Area</b>	Tier 2 Priority Areas
	<b>Goals Supported</b>	Production of new units & rehabilitation of existing housing or neighborhood facilities (such as open space or park)
	<b>Needs Addressed</b>	Increase Supply of Affordable Housing Develop & Implement Place-Based Strategies for CD
	<b>Funding</b>	<b>\$230,082</b> (\$115,082 annual allocation + \$115,000 carryforward)
	<b>Description</b>	MDHA will identify vacant or built properties that are suitable for housing to be occupied by LMI persons or neighborhood facilities that benefit LMI areas.
	<b>Target Date</b>	7/1/16-6/30/17
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	3 properties
	<b>Location Description</b>	Areas with high concentrations of poverty
	<b>Planned Activities</b>	Activities will include acquisition and related activities (clearance, demolition, relocation clean up, and disposition). Disposition activities extend countywide. Activities will be undertaken by MDHA. \$115,000 set-aside as match for Choice Neighborhoods Grant, if successful. If not, will be used in eligible areas.

2	<b>Project Name</b>	<b>CDBG: Administration and Planning</b>
	<b>Target Area</b>	Countywide
	<b>Goals Supported</b>	Planning
	<b>Needs Addressed</b>	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
	<b>Funding</b>	<b>\$971,840</b> (\$911,840 annual allocation + \$60,000 estimated program income)
	<b>Description</b>	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.
	<b>Target Date</b>	4/1/16-6/30/17
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	N/A
	<b>Location Description</b>	MDHA Administrative Offices
	<b>Planned Activities</b>	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.

<b>3</b>	<b>Project Name</b>	CDBG: Economic Development: Commercial Rehab (Façade Loans)
	<b>Target Area</b>	Tier 1 Areas
	<b>Goals Supported</b>	Public Service & Economic Development
	<b>Needs Addressed</b>	Develop & Implement Place-Based Strategies for CD
	<b>Funding</b>	<b>\$150,000</b> (carryforward funds)
	<b>Description</b>	Financial assistance for the exterior rehab of commercial buildings located in Target Areas
	<b>Target Date</b>	4/1/13-6/30/17
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	3 businesses
	<b>Location Description</b>	Businesses located in Tier 1 Areas.
	<b>Planned Activities</b>	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.

4	<b>Project Name</b>	CDBG: Economic Development: Business Technical Assistance
	<b>Target Area</b>	Tier 1 Areas
	<b>Goals Supported</b>	Public Service & Economic Development
	<b>Needs Addressed</b>	Develop & Implement Place-Based Strategies for CD
	<b>Funding</b>	<b>\$0.00</b> (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.)
	<b>Description</b>	Technical assistance and training provided directly to for-profit businesses and to businesses where one of the owners qualifies as LMI.
	<b>Target Date</b>	10/1/15-9/30/2017
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	20 businesses annually
	<b>Location Description</b>	Tier 1 Areas
	<b>Planned Activities</b>	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.



<b>5</b>	<b>Project Name</b>	CDBG: Economic Development: Microenterprise Assistance
	<b>Target Area</b>	Tier 1 Areas
	<b>Goals Supported</b>	Public Service & Economic Development
	<b>Needs Addressed</b>	Develop & Implement Place-Based Strategies for CD
	<b>Funding</b>	<b>\$215,000</b> (carryforward)
	<b>Description</b>	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.
	<b>Target Date</b>	7/1/16-6/30/17
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	15 businesses annually
	<b>Location Description</b>	Tier 1 Areas
	<b>Planned Activities</b>	In coordination with the Mayor's ECD Office, MDHA will partner with a subrecipient 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.

<b>6</b>	<b>Project Name</b>	CDBG: Economic Development: Section 108 Loan Repayment
	<b>Target Area</b>	East Bank of Cumberland River
	<b>Goals Supported</b>	Public Service & Economic Development
	<b>Needs Addressed</b>	N/A
	<b>Funding</b>	<b>\$505,299</b> (annual allocation)
	<b>Description</b>	Funds will be used to make principal and interest payments on a Section 108 loan.
	<b>Target Date</b>	8/31/1998-8/1/2018
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	N/A
	<b>Location Description</b>	East Bank of Cumberland River
	<b>Planned Activities</b>	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 1/4/2016, the loan balance is \$1,435,000.

7	<b>Project Name</b>	CDBG: Housing: Homeowner Rehabilitation
	<b>Target Area</b>	Countywide
	<b>Goals Supported</b>	Production of new units & Rehabilitation of existing units
	<b>Needs Addressed</b>	Increase Supply of Affordable Housing Affirmatively Further Fair Housing Choice
	<b>Funding</b>	<b>\$1,531,954</b> (\$1,310,000 annual allocation + \$192,000 estimated program income + \$29,954 from reprogrammed)
	<b>Description</b>	Repair/rehab of homes occupied by LMI families.
	<b>Target Date</b>	9/1/16-3/30/17
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	77 LMI families (≤ 80% AMI)
	<b>Location Description</b>	Countywide, with targeted outreach to areas that have been historically underserved
	<b>Planned Activities</b>	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.

<b>8</b>	<b>Project Name</b>	<b>CDBG: Housing: Homeowner Rehabilitation (Targeted)</b>
	<b>Target Area</b>	North Nashville (Tier 2 Priority Area)
	<b>Goals Supported</b>	Production of new units & Rehabilitation of existing units
	<b>Needs Addressed</b>	Increase Supply of Affordable Housing Develop & Implement Place-Based Strategies for CD Affirmatively Further Fair Housing
	<b>Funding</b>	<b>\$0.00</b> (Rebuilding Together Nashville is implementing the 2014/2015 program.)
	<b>Description</b>	Repair/rehab of homes occupied by LMI families within the North Nashville Tier 2 Priority Area
	<b>Target Date</b>	4/1/16-3/31/17
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	55
	<b>Location Description</b>	North Nashville (Tier 2 Priority Area)
	<b>Planned Activities</b>	MDHA, through contracted its partner Neighborhoods Resource Center and the community, has identified streets within North Nashville (Tier 2 Priority Area) to be targeted for the improvements associated with this activity. MDHA staff will be responsible for taking applications and determining the eligibility of applicants. The construction/project management coordination services will be handled by the nonprofit organization, Rebuilding Together Nashville that was selected through the procurement process. Assistance may be treated as a grant and will include repairs that address health and safety needs, such as heat/air, roof repair, plumbing, electrical, and accessibility and exterior aesthetic improvements (excluding landscaping). Priority will be 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.

<b>9</b>	<b>Project Name</b>	CDBG: Housing: HVAC Installation/Replacement Program
	<b>Target Area</b>	Countywide
	<b>Goals Supported</b>	Production of new units & Rehabilitation of existing units
	<b>Needs Addressed</b>	Increase Supply of Affordable Housing Affirmatively Further Fair Housing Choice
	<b>Funding</b>	<b>\$200,000</b> (\$60,000 annual allocation + \$140,000 carryforward))
	<b>Description</b>	Installation of new HVAC systems or replacement of nonfunctioning HVAC units for eligible
	<b>Target Date</b>	4/1/15-6/30/17
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	40
	<b>Location Description</b>	Countywide
	<b>Planned Activities</b>	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.

<b>10</b>	<b>Project Name</b>	<b>CDBG: Housing: Program Delivery</b>
	<b>Target Area</b>	Countywide
	<b>Goals Supported</b>	Production of new units & Rehabilitation of existing units
	<b>Needs Addressed</b>	Increase Supply of Affordable Housing Develop & Implement Place-Based Strategies for CD Affirmatively Further Fair Housing
	<b>Funding</b>	<b>\$450,000</b> (\$402,000 annual allocation + \$48,000 program income)
	<b>Description</b>	Costs associated with CDBG housing activities.
	<b>Target Date</b>	4/1/16-6/30/17
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Accomplishments will be tied to specific Housing activities.
	<b>Location Description</b>	Countywide
	<b>Planned Activities</b>	Costs directly related to carrying out specific CDBG Housing activities.

<b>11</b>	<b>Project Name</b>	<b>CDBG: Housing: Housing Services</b>
	<b>Target Area</b>	Countywide
	<b>Goals Supported</b>	Production of new units & Rehabilitation of existing units
	<b>Needs Addressed</b>	Increase Supply of Affordable Housing Develop & Implement Place-Based Strategies for CD Affirmatively Further Fair Housing
	<b>Funding</b>	<b>\$50,000</b> (annual allocation)
	<b>Description</b>	Costs to support activities eligible for funding under the HOME program
	<b>Target Date</b>	4/1/16-6/30/17
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Accomplishments will be tied to specific HOME activities undertaken in PY 2016.
	<b>Location Description</b>	Countywide
	<b>Planned Activities</b>	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	<b>Project Name</b>	CDBG: Housing: Rental Rehab
	<b>Target Area</b>	Countywide
	<b>Goals Supported</b>	Production of new units & Rehabilitation of existing units
	<b>Needs Addressed</b>	Increase Supply of Affordable Housing Affirmatively Further Fair Housing Choice
	<b>Funding</b>	<b>\$550,000</b> (\$250,000 annual allocation + \$250,000 carryforward + \$50,000 from reprogrammed)
	<b>Description</b>	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.
	<b>Target Date</b>	9/1/16-6/30/17
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	15 LMI families (≤ 60% AMI)
	<b>Location Description</b>	Countywide
	<b>Planned Activities</b>	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; 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	<b>Project Name</b>	CDBG: Public Facilities: Neighborhood Facilities
	<b>Target Area</b>	Tier 1 Areas
	<b>Goals Supported</b>	Public Facilities/Public Improvements and Infrastructure
	<b>Needs Addressed</b>	Develop & Implement Place-Based Strategies for CD
	<b>Funding</b>	<b>\$750,000</b> (\$250,000 annual allocation + \$250,000 carryforward + \$250,000 in reprogrammed funds)
	<b>Description</b>	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.
	<b>Target Date</b>	7/1/16-6/30/17
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	5 Facilities
	<b>Location Description</b>	Tier 1 Areas
<b>Planned Activities</b>	Eligible costs include hard and soft construction costs, energy efficiency improvements and accessibility improvements. Operation and maintenance costs are ineligible. Up to \$500,000 may be made available to nonprofits through a competitive process to be announced in late Spring 2016 and. A minimum of \$250,000 will be designated for specific projects identified by Metro.	



14	<b>Project Name</b>	<b>CDBG: Public Facilities: Infrastructure Improvements</b>
	<b>Target Area</b>	Tier 2 Priority Areas
	<b>Goals Supported</b>	Public Facilities/Public Improvements and Infrastructure
	<b>Needs Addressed</b>	Develop & Implement Place-Based Strategies for CD
	<b>Funding</b>	<b>\$255,000</b> (\$175,000 annual allocation + \$80,000 in reprogrammed funds)
	<b>Description</b>	Construction and installation of infrastructure improvements in Tier 2 Priority Areas to connect residents in LMI areas to services
	<b>Target Date</b>	7/1/16-6/30/17
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	2 Projects
	<b>Location Description</b>	Tier 2 Priority Areas
<b>Planned Activities</b>	Improvements include sidewalks and bus stops.; Projects will be identified in collaboration with the Mayor's Infrastructure Team	

15	<b>Project Name</b>	<b>CDBG: Public Services: Summer Youth Program</b>
	<b>Target Area</b>	Countywide
	<b>Goals Supported</b>	Public Service & Economic Development
	<b>Needs Addressed</b>	Provide Summer Programs for LMI Youth
	<b>Funding</b>	<b>\$430,000</b> (annual allocation)
	<b>Description</b>	Funding for the eligible costs of new or enhanced Summer Programs for LMI youth ages 6-18 provided by nonprofits or public agencies.
	<b>Target Date</b>	6/1/2016-7/31/2016
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	2100
	<b>Location Description</b>	Countywide
<b>Planned Activities</b>	Activities should enhance participants' academic, artistic, and athletic interests, as well as promote job skills development and/or healthy lifestyles, to help prepare Metro Nashville's youth to become successful adults. Funding will be awarded through a competitive process.	

16	<b>Project Name</b>	CDBG: Public Services: Fair Housing
	<b>Target Area</b>	Tier 1 Areas
	<b>Goals Supported</b>	Public Service & Economic Development
	<b>Needs Addressed</b>	Affirmatively Further Fair Housing Choice
	<b>Funding</b>	\$36,000 (carryforward)
	<b>Description</b>	Fair housing counseling, outreach, and education; conduct complaint-based and targeted testing, primarily in Tier 1 areas.
	<b>Target Date</b>	7/1/16-6/30/17
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	300
	<b>Location Description</b>	Tier 1 Areas
	<b>Planned Activities</b>	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 2 additional terms.

17	<b>Project Name</b>	CDBG: Public Services: Healthy Food Initiatives
	<b>Target Area</b>	LMI Food Deserts
	<b>Goals Supported</b>	Public Service & Economic Development
	<b>Needs Addressed</b>	Increase Access to Healthy Food Choices
	<b>Funding</b>	\$24,000 (carryforward)
	<b>Description</b>	Public service and outreach/education campaign on making healthy food choices.
	<b>Target Date</b>	7/1/16-6/30/17
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	200
	<b>Location Description</b>	Metro Nashville LMI census tracts identified as food deserts by the USDA's Economic Research Service.
<b>Planned Activities</b>	Activities include classes on selecting, preparing, and storing healthy food, particularly directed to migrant populations, low-income families (especially public housing residents), and homeless populations. Funding will be awarded to a subrecipient.	

<b>18</b>	<b>Project Name</b>	<b>CDBG: Public Services: Services for Homeless Persons</b>
	<b>Target Area</b>	Countywide
	<b>Goals Supported</b>	Public Service & Economic Development
	<b>Needs Addressed</b>	Decrease Homelessness
	<b>Funding</b>	<b>\$190,000</b> (\$100,000 annual allocation + \$50,000 carryforward + \$40,000 from reprogrammed funds)
	<b>Description</b>	Services include emergency payment of rent and utilities; facilitate Metro's encampment response through the operation of a shelter or outreach team
	<b>Target Date</b>	7/1/16-6/30/17
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Emergency payments: 150 individuals Encampment Response: 60 individuals
	<b>Location Description</b>	Countywide
	<b>Planned Activities</b>	-Emergency Payments: \$150,000 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. -Encampment Response: \$40,000 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.

<b>19</b>	<b>Project Name</b>	<b>CDBG: Other: Nonprofit Organization Capacity Building</b>
	<b>Target Area</b>	Tier 1 Areas
	<b>Goals Supported</b>	Planning
	<b>Needs Addressed</b>	Increase Supply of Affordable Housing Develop & Implement Place-Based Strategies for CD
	<b>Funding</b>	<b>\$50,000</b> (carryforward)
	<b>Description</b>	Technical assistance provided to nonprofits related to building capacity for neighborhood revitalization or economic development.
	<b>Target Date</b>	7/1/16-6/30/17
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	10 entities annually
	<b>Location Description</b>	Tier 1 Areas
	<b>Planned Activities</b>	MDHA will partner with the Mayor's Office of Economic Opportunity and Empowerment and a possible subrecipient to utilize these funds to structure a training/mentoring program with an emphasis on affordable housing development and preservation for low-income families as a key tool for neighborhood revitalization.

20	<b>Project Name</b>	HOME: Administration
	<b>Target Area</b>	Countywide
	<b>Goals Supported</b>	Planning
	<b>Needs Addressed</b>	Increase Supply of Affordable Housing Affirmatively Further Fair Housing Choice
	<b>Funding</b>	<b>\$204,975</b> (\$181,975 annual allocation + \$23,000 estimated program income)
	<b>Description</b>	Provide grant management, compliance, and oversight of HOME-funded activities.
	<b>Target Date</b>	4/1/16-/30/17
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	N/A
	<b>Location Description</b>	MDHA Central Office
	<b>Planned Activities</b>	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	<b>Project Name</b>	HOME: Homeownership: Homebuyer Programs
	<b>Target Area</b>	Countywide
	<b>Goals Supported</b>	Production of new units & Rehabilitation of existing
	<b>Needs Addressed</b>	Increase Supply of Affordable Housing
	<b>Funding</b>	\$500,000 (\$400,000 annual allocation + \$60,000 estimated program income + \$40,000 carryforward)
	<b>Description</b>	New home construction, acquisition rehab of existing homes, and downpayment assistance in conjunction with the purchase of homes for LMI households ( $\leq$ 80% AMI)
	<b>Target Date</b>	7/1/16-6/30/17
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	6 (New home construction and or acquisition and rehab of existing units and downpayment assistance to purchasers of same)
	<b>Location Description</b>	Countywide
<b>Planned Activities</b>	New Home Construction, Acquisition/Rehab, and Downpayment Assistance to eligible homebuyers in conjunction with the purchase of a home that has been constructed or acquired and rehabilitated with HOME funds by MDHA or developer partners. 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.	

22	<b>Project Name</b>	HOME: Homeownership: Homeowner Rehab
	<b>Target Area</b>	Countywide
	<b>Goals Supported</b>	Production of new units & Rehabilitation of existing
	<b>Needs Addressed</b>	Increase Supply of Affordable Housing
	<b>Funding</b>	\$115,000 (carryforward)
	<b>Description</b>	Assistance for large-scale rehabilitation or reconstruction of owner-occupied units.
	<b>Target Date</b>	4/1/16-6/30/17
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	1
	<b>Location Description</b>	Countywide
	<b>Planned Activities</b>	Rehab/reconstruction must meet address all health and safety issues; upgrade major housing systems to ensure a minimum of a five (5) year useful life expectancy; address lead based paint; accessibility requirements, as applicable; all local building codes, ordinances and zoning requirements; and Uniform Physical Condition Standards (UPCS) for properties. Assistance for rehabilitation will be in the form of a forgivable loan for elderly (62+) homeowners and a deferred (due on sale) loan for other homeowners. Assistance for reconstruction will be in the form of a grant for elderly (62+) homeowners and a deferred (due on sale) loan for other homeowners. Applicants will be referred from the CDBG Homeowner Rehab Program.



23	<b>Project Name</b>	HOME: Rental: Rental Projects
	<b>Target Area</b>	Countywide
	<b>Goals Supported</b>	Production of new units & Rehabilitation of existing
	<b>Needs Addressed</b>	Increase Supply of Affordable Housing Develop & Implement Place-Based Strategies for CD Affirmatively Further Fair Housing Choice
	<b>Funding</b>	<b>\$1,984,782</b> (\$1,237,782 annual allocation + \$147,000 estimated program income + \$600,000 carryforward)
	<b>Description</b>	Funding for construction of new properties for rent to households with incomes ≤ 60% AMI
	<b>Target Date</b>	4/1/16-6/30/17
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	40 units
	<b>Location Description</b>	Countywide
	<b>Planned Activities</b>	A minimum of \$275,000 will be set aside for eligible CHDO projects. A minimum of \$500,000 will be set aside for redevelopment of MDHA-owned properties converted under RAD. For remaining funds, 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. 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.

24	<b>Project Name</b>	ESG: Administration
	<b>Target Area</b>	Countywide
	<b>Goals Supported</b>	Planning
	<b>Needs Addressed</b>	Decrease Homelessness
	<b>Funding</b>	<b>\$31,000</b> (annual allocation)
	<b>Description</b>	Provide grant management, compliance, and oversight of ESG-funded activities
	<b>Target Date</b>	4/1/16-6/30/17
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	N/A
	<b>Location Description</b>	MDHA Central Office
	<b>Planned Activities</b>	Program administration costs include staff and related costs required for overall program management, coordination, monitoring, reporting, and evaluation. Administrative activities will be undertaken by MDHA staff.

25	<b>Project Name</b>	ESG: Emergency Shelter and Transitional Housing
	<b>Target Area</b>	Countywide
	<b>Goals Supported</b>	Outreach, Emergency Shelter & Transitional Housing
	<b>Needs Addressed</b>	Decrease Homelessness
	<b>Funding</b>	<b>\$180,000</b> (annual allocation)
	<b>Description</b>	Funding to provide operations and essential services
	<b>Target Date</b>	7/1/16-6/30/17
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	2000 persons
	<b>Location Description</b>	Countywide

<p><b>Planned Activities</b></p>	<p><u>Shelter Operations</u>: maintenance, rent, repair, security, fuel, equipment, insurance, utilities, relocation, and furnishings. The interim ESG rule adds to the list of eligible shelter activities the costs of supplies and motel/hotel stays in certain cases.</p> <p>ESG funds may be used for emergency shelters only. A transitional facility will only be eligible to receive ESG funds if EITHER:</p> <p>It meets BOTH of the following criteria under the new <i>emergency shelter</i> definition:</p> <ul style="list-style-type: none"> <li>(a) its primary purpose is to provide a temporary shelter for the homeless in general or for specific populations of the homeless; and</li> <li>(b) it does not require occupants to sign leases or occupancy agreements;</li> </ul> <p>O R</p> <p>It received funds under a FY 2010 ESG grant and met the criteria under the former emergency shelter definition (“any facility, the primary purpose of which is to provide temporary or transitional shelter for the homeless”).</p> <p><u>-Essential Services</u>, such as case management, childcare, education services, employment assistance and job training, outpatient health services, legal services, life skills training, mental health services, substance abuse treatment services, transportation, and services for special populations.</p> <p>Funding will be awarded to qualified nonprofits through a competitive process to be announced late March/early April.</p>
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26	<b>Project Name</b>	ESG: Homeless Management Information System (HMIS)
	<b>Target Area</b>	County
	<b>Goals Supported</b>	Outreach, Emergency Shelter & Transitional Housing, Permanent Housing
	<b>Needs Addressed</b>	Decrease Homelessness
	<b>Funding</b>	\$15,000 (annual allocation)
	<b>Description</b>	Costs associated with maintaining HMIS
	<b>Target Date</b>	7/1/16-6/30/17
	<b>Estimate the number</b>	3000 persons
	<b>Location Description</b>	MDHA Central Office
	<b>Planned Activities</b>	Software costs; data review, input, and quality control; reporting. The activity will be performed by MDHA staff.

27	<b>Project Name</b>	ESG: Rapid Re-housing
	<b>Target Area</b>	Countywide
	<b>Goals Supported</b>	Permanent Housing
	<b>Needs Addressed</b>	Decrease Homelessness
	<b>Funding</b>	\$112,420 (annual allocation)
	<b>Description</b>	Services and direct housing assistance to help people who are homeless move quickly into permanent housing and achieve stability in that housing.
	<b>Target Date</b>	7/1/16-6/30/17
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	300 persons
	<b>Location Description</b>	Countywide
	<b>Planned Activities</b>	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. Funding will be awarded to qualified nonprofits through a competitive process to be announced late March/early April.

28	<b>Project Name</b>	ESG: Street Outreach
	<b>Target Area</b>	Countywide
	<b>Goals Supported</b>	Outreach
	<b>Needs Addressed</b>	Decrease Homelessness
	<b>Funding</b>	<b>\$38,000</b> (annual allocation)
	<b>Description</b>	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.
	<b>Target Date</b>	7/1/16-6/30/17
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	100 persons
	<b>Location Description</b>	Countywide
	<b>Planned Activities</b>	Eligible costs include engagement, case management, emergency health and mental health services, and transportation. Funding will be awarded to qualified nonprofits through a competitive process to be announced late March/early April.

29	<b>Project Name</b>	ESG: Prevention	
	<b>Target Area</b>	Countywide	
	<b>Goals Supported</b>	Outreach	
	<b>Needs Addressed</b>	Decrease Homelessness	
	<b>Funding</b>	<b>\$40,000</b> (annual allocation)	
	<b>Description</b>	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.	
	<b>Target Date</b>	7/1/16-6/30/17	
		<b>Estimate the number and type of families that will benefit from the proposed activities</b>	27 persons
		<b>Location Description</b>	Countywide
		<b>Planned Activities</b>	Rental assistance (such as arrears) and housing relocation and stabilization services. Funding will be awarded to qualified nonprofits through a competitive process to be announced in April.

30	<b>Project Name</b>	HOPWA: Administration
	<b>Target Area</b>	Metropolitan Statistical Area
	<b>Goals Supported</b>	Housing Opportunities for Persons with AIDS
	<b>Needs Addressed</b>	Provide Housing Assistance for Persons with HIV
	<b>Funding</b>	<b>\$94,200</b> (annual allocation)
	<b>Description</b>	Provide grant management, compliance and oversight of HOPWA-funded programs.
	<b>Target Date</b>	4/1/16-6/30/17
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	N/A
	<b>Location Description</b>	MSA
	<b>Planned Activities</b>	<p>Program administration costs include staff and related costs required for overall program management, coordination, monitoring, reporting, and evaluation. \$28,260 will be retained by MDHA. The remaining funds will be awarded to Sponsors selected for funding through a Request for Proposals to be issued late March/early April. 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. Proposals will be evaluated in accordance with the evaluation criteria contained in the RFP and ranked from highest to lowest. Funding will be awarded for projects according to their overall rank until funding is exhausted.</p>

31	<b>Project Name</b>	HOPWA: Facility-Based Operations
	<b>Target Area</b>	Metropolitan Statistical Area
	<b>Goals Supported</b>	Housing Opportunities for Persons with AIDS
	<b>Needs Addressed</b>	Provide Housing Assistance for Persons with HIV
	<b>Funding</b>	\$172,882 (annual allocation)
	<b>Description</b>	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 organization, and other housing facilities approved by HUD.
	<b>Target Date</b>	7/1/16-6/30/17
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	42 households
	<b>Location Description</b>	MSA
<b>Planned Activities</b>	Eligible costs include operating costs for housing such maintenance, security, operation, insurance, utilities, furnishings, equipment, supplies, and other incidental costs. Funds will be awarded to Sponsors selected for funding through a Request for Proposals to be issued late March/early April. 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. Proposals will be evaluated in accordance with the evaluation criteria contained in the RFP and ranked from highest to lowest. Funding will be awarded for projects according to their overall rank until funding is exhausted.	

32	<b>Project Name</b>	HOPWA: Short-term Rent, Mortgage, and/or Utility Payments (STRMU)
	<b>Target Area</b>	Metropolitan Statistical Area
	<b>Goals Supported</b>	Housing Opportunities for Persons with AIDS
	<b>Needs Addressed</b>	Provide Housing Assistance for Persons with HIV
	<b>Funding</b>	<b>\$250,000</b> (annual allocation)
	<b>Description</b>	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.
	<b>Target Date</b>	7/1/16-6/30/17
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	334 households
	<b>Location Description</b>	MSA
<b>Planned Activities</b>	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. Funds will be awarded to Sponsors selected for funding through a Request for Proposals to be issued late March/early April. 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. Proposals will be evaluated in accordance with the evaluation criteria contained in the RFP and ranked from highest to lowest. Funding will be awarded for projects according to their overall rank until funding is exhausted.	



33	<b>Project Name</b>	HOPWA: Supportive Services
	<b>Target Area</b>	Metropolitan Statistical Area
	<b>Goals Supported</b>	Housing Opportunities for Persons with AIDS
	<b>Needs Addressed</b>	Provide Housing Assistance for Persons with HIV
	<b>Funding</b>	<b>\$425,000</b> (annual allocation)
	<b>Description</b>	Services supporting the housing stability of program participants.
	<b>Target Date</b>	7/1/16-6/30/17
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	1488 households
	<b>Location Description</b>	MSA
	<b>Planned Activities</b>	Supportive services include, but are not limited to, health, mental health, assessment, 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. Funds will be awarded to Sponsors selected for funding through a Request for Proposals to be issued late March/early April. 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. Proposals will be evaluated in accordance with the evaluation criteria contained in the RFP and ranked from highest to lowest. Funding will be awarded for projects according to their overall rank until funding is exhausted.

**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**

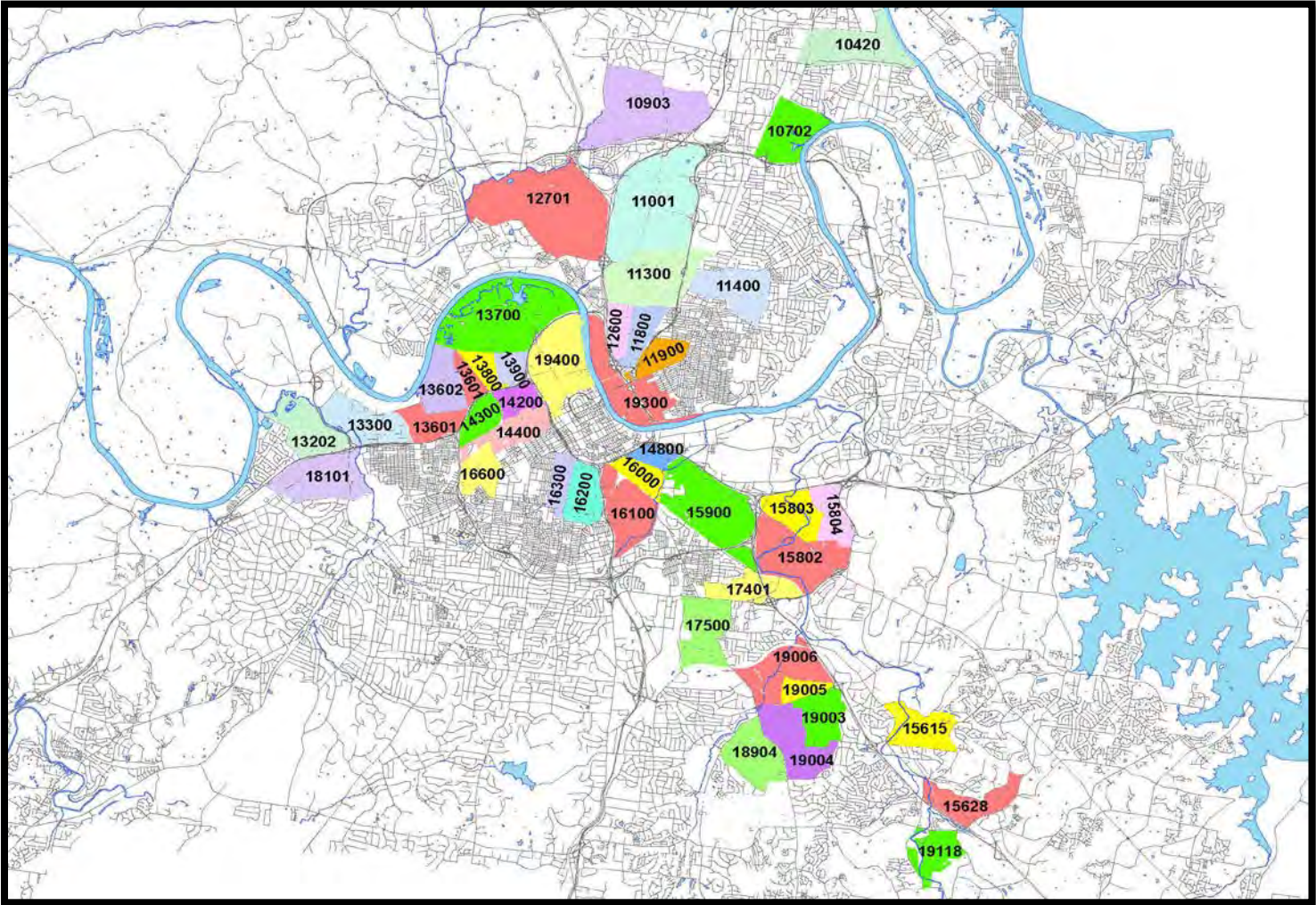
Tier 1 areas are census tracts where at least 65% of households are at or below 80% AMI or are part of a Tier 2 Priority Area. Tier 1 census tracts are listed below and are based on the latest data from the American Community Survey. A map showing all Tier 1 census tracts is provided on the following 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 10<sup>th</sup> & Jefferson.

Tier 2 – North Nashville Census Tracts

013601	013602	013700	013800	013900	014200	014300	019400
--------	--------	--------	--------	--------	--------	--------	--------

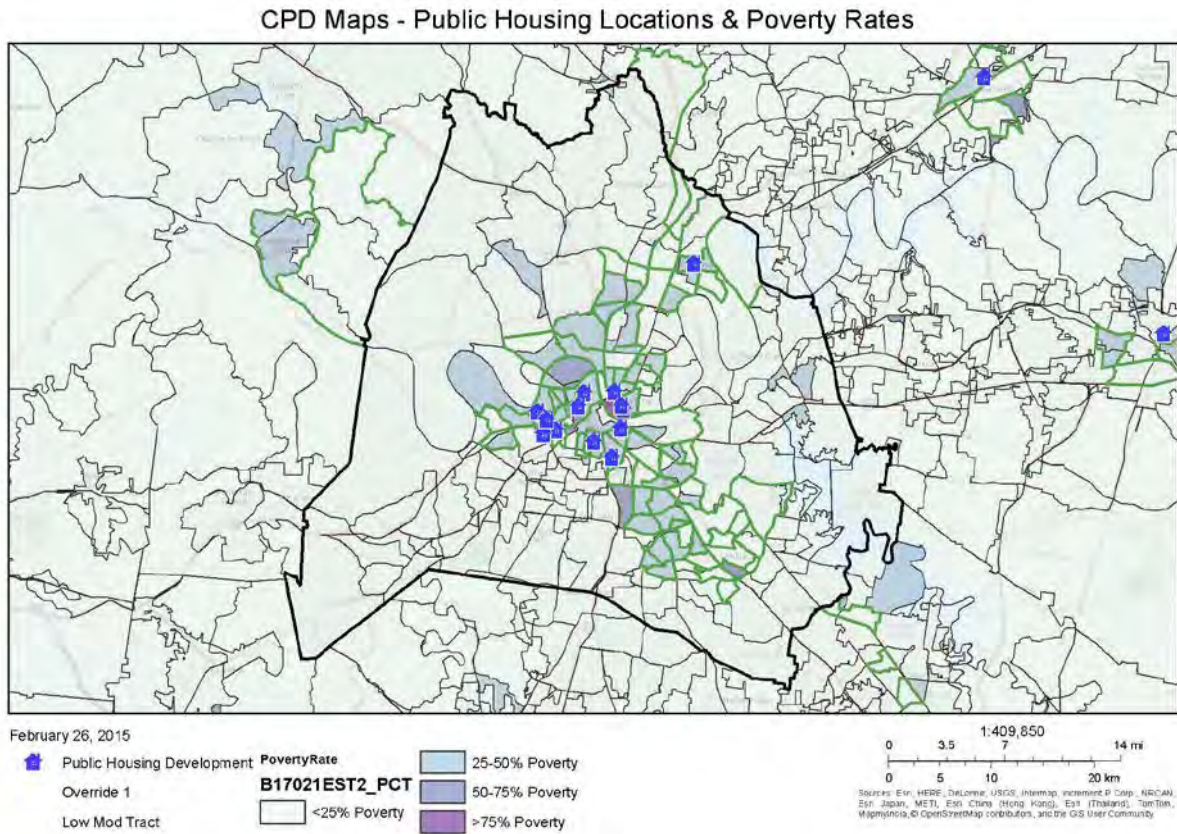
Tier 2 – North Nashville Map



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						



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**

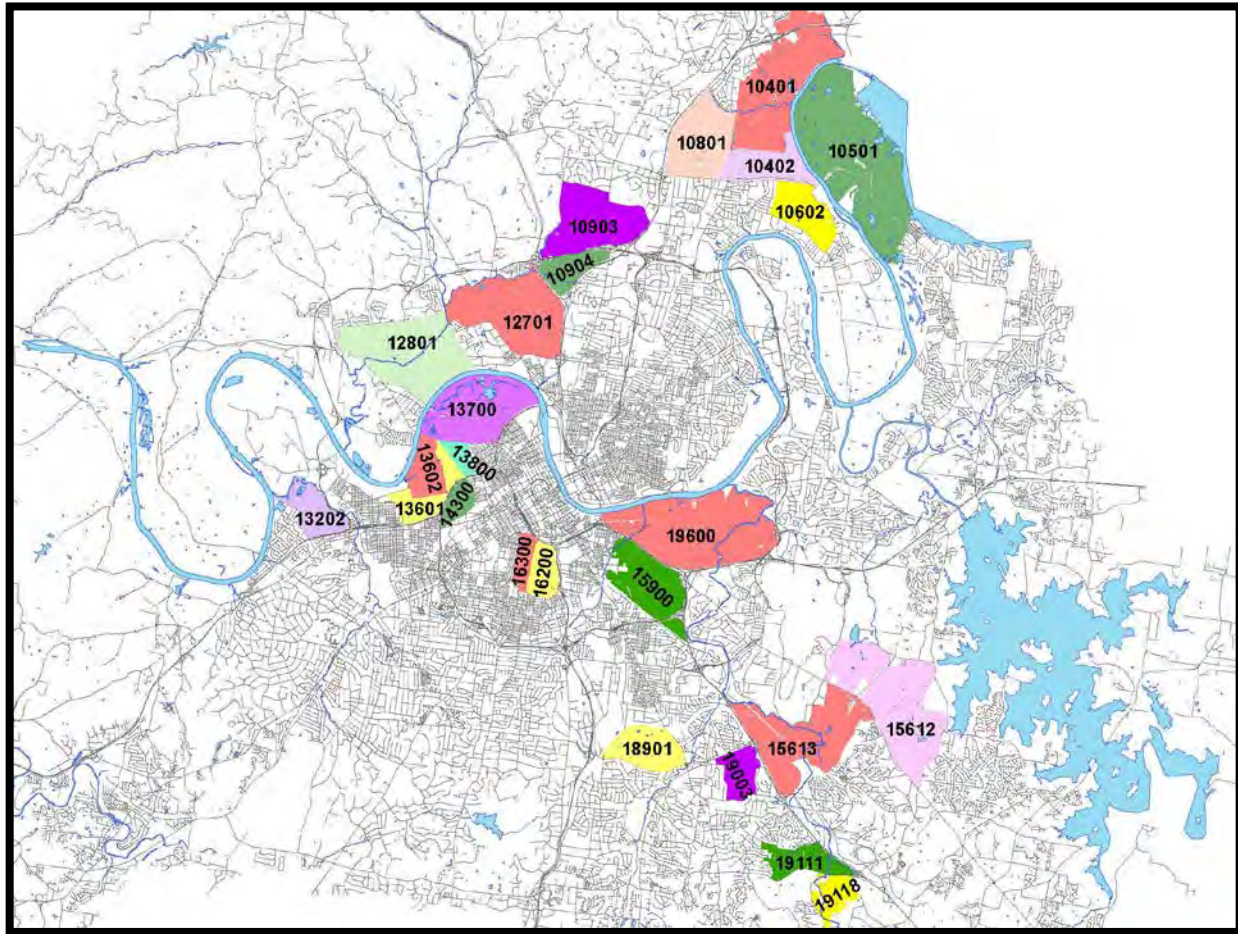
Food Deserts

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 are 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. *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	018901	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	14%
Tier 2 Priority Areas	8%*
LMI Census Tracts also designated as Food Desert Areas	<1%
Target Area	Percentage of HOPWA Funds
Metropolitan Statistical Area (MSA)	100%

**Table 10 - Geographic Distribution**

\*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 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 2016 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 an Inclusionary Housing Feasibility and Policy Study. 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 study will result in policy recommendations being presented to Metro Council for approval in early 2016.

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.*

<b>One Year Goals for the Number of Households to be Supported</b>	
Homeless	477
Non-Homeless	235
Special Needs	334
<b>Total</b>	<b>1046</b>

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

<b>One Year Goals for the Number of Households Supported Through</b>	
Rental Assistance	811
Production of New Units	46
Rehab of Existing Units	187
Acquisition of Existing Units	2
<b>Total</b>	<b>1046</b>

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.

- **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 most HOME funds for new construction rather than for rehab. During the Program Year, MDHA will make available HOME funding opportunities for 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, and soft costs. All projects are subject to underwriting by MDHA in accordance with HOME program regulations.

- **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:** Homes must be sold to households with incomes at or below 80% AMI. However, 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(initially targeted to areas of the County deemed recently underserved) Rehab Program: 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: CDBG funds that were allocated from 2013 and 2014 program years have been reserved for Targeted Rehab in North Nashville as part of the Placed-Based Strategy initiative. MDHA has partnered with Neighborhood Resource Center (NRC) and the community to identify streets where the homeowner rehab funds can be targeted to achieve the greatest impact. The North Nashville area is currently receiving substantial attention from investors trying to acquire properties for new commercial and residential development. Community members have expressed concerns regarding gentrification and are researching ways to ensure continued affordability of the existing housing stock. NRC obtained input from the community on how assistance provided through the homeowner rehab program should be structured to ensure that the properties assisted remain affordable. MDHA finalized the structure for the type of assistance for the targeted rehab program based on community input in late 2015 which favored funds being granted to individual property owners. The program will begin taking applications in early 2016.
  
    - A limited amount of HOME funds will be available for rehab/reconstruction of owner-occupied units with needs greater than those that can be assisted through the CDBG-funded regular homeowner rehabilitation program. Cases are referred to this program by Homeowner Rehab Advisors after performing home inspections. Assistance for rehabilitation is in the form of a forgivable loan for elderly (62+) homeowners and a deferred (due on sale) loan for other homeowners. Assistance for reconstruction will be in the form of a grant for

elderly (62+) homeowners and a deferred (due on sale) loan for other homeowners..

- HVAC Installation/Replacement Program: CDBG funds will be used to expedite installation or repair/replacement of 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 2016 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.
- **Acquisition of Existing Units**
    - **Acquisition:** MDHA may utilize CDBG funds to acquire property in Tier 2 Priority Areas for affordable housing.
    - **Downpayment Assistance:** Financial assistance may be made available to households making less than 80% AMI for the purchase of homes constructed or acquired and rehabilitated with HOME funds. Recipients must complete housing counseling.
  - **Barnes Housing Trust Fund:** MDHA will continue to collaborate with the Metropolitan Trust Fund Commission on the best use of HOME and Barnes Funds. Following MDHA procurement standards, availability, commitment and expenditure deadlines, a portion of 2016 HOME funds may be used to leverage additional funds for projects submitted to the Barnes Housing Trust Fund.
  - **CHDO Set-Aside:** A minimum of fifteen percent (15%) of the annual HOME allocation (\$272,963.55) must be set aside for designated CHDOs to undertake affordable housing development. MDHA has set-aside \$275,000 of funds for new rental construction for CHDOs. In addition, MDHA will make funds for

homeownership projects available to CHDOs. To assist organizations with their capacity needs, MDHA will continue to provide technical assistance as needed.

- **RAD Set Aside:** MDHA proposes to set-aside \$500,000 of HOME funds 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 12,000 persons. In 2016, 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 20 days from the date of the letter.
- 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 will have been purged in March, 2016. MDHA will open waitlists by property type (family, contemporary, elderly, and elderly and disabled), ask applicants to select the specific property in which they are interested in applying, and develop a pool of applicants for each specific property. Applications will be processed chronologically in date order. Upon closing, 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 2015, MDHA provided rental assistance through the voucher program to over 6,000 households. The Rental Assistance Department strives to reach an annual utilization rate of at least 99% of all issued vouchers. 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 continued the online only system for taking application during the 2015 program year. 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 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 2016.

### **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. 113 new landlords were added as of FY ending 9/30/2015. 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.

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 Summer 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.

\$500,000 from the 2016 HOME allocation is being set aside for new construction in conjunction with RAD. MDHA is moving forward with its Envision Cayce Plan with 60 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>.

A portion of CDBG funds have been allocated to address the needs of public housing residents. The Microenterprise and Business Technical Assistance programs will provide economic development opportunities to public housing residents. Healthy Food Initiatives will include public housing properties. MDHA will 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, MDHA was awarded \$2.7 million in December 2015 to be used for a Jobs Plus Pilot Initiative. This is a 4-year program and the funding will be used to expand locally based, job-driven services such as work readiness training, employer linkages, job placement, educational advancement, technology skills, computer literacy, community leadership, and financial literacy and deliver them to the residents in the J.C. Napier Homes and adjacent Tony Sudekum Homes public housing developments. The Jobs Plus program represents a community collaboration between MDHA, the Martha O'Bryan Center, the Nashville Career Advancement Center, and the Nashville Financial Empowerment Center. These agencies address poverty among public housing residents and will leverage their collective experience to build a culture of work through the Jobs Plus program model. Jobs Plus combines three core components:

- 1) employment-related services,
- 2) community supports for work, and
- 3) financial incentives to remove barriers and advance employment outcomes.

Additional grants being pursued during the 2016 program year that will benefit public housing residents if they are received are as follows:

- Nursing Workforce Diversity 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. Eligible public housing residents will live in one of six MDHA communities located in federally designated health professional shortage areas.

- Tennessee (TN) Department of Environment and Conservation Clean TN Energy Grant Program would support infrastructure upgrades to MDHA public housing with products that reduce emissions and pollutants through cleaner alternative energy, energy conservation, and air quality improvements. Examples of upgrades include replacement of electric water heaters with Energy Star heat pump water heaters, replacement of gas fired furnaces with Energy Star rated furnaces; and installation of low-flow sink faucet aerators.
- Choice Neighborhoods Planning Grant to support community stakeholders and residents of J.C. Napier and Tony Sudekum Homes public housing sites to develop a plan to transform these communities. The Choice Neighborhoods program is focused on three core goals: Housing – replace distressed public housing with well-managed, high-quality, mixed-income housing that complements the surrounding neighborhoods; People – improve educational outcomes and intergenerational mobility for youth and supports delivered directly to youth and their families; and Neighborhoods – create the conditions necessary for public and private reinvestment in distressed neighborhoods to offer the kinds of amenities and assets, including safety, good schools, and commercial activity, that are important to families’ choices about their community.
- Promise Zone Designation will be pursued during 2016 for selected public housing properties. Receipt of this designation will allow the selected communities to work directly with federal, state and local agencies and give local leaders proven tools to improve the quality of life in those communities.
- TechHire Partnership Grants in partnership with the Nashville Technology Council, funding from the TechHire grant will provide jobs skills training and internships to MDHA residents in the information technology field including software development, network administration, and cyber security.
- 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.

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 outlets for public housing residents to be involved. Two membership positions on the MDHA Board of Commissioners are filled by public housing residents. Residents may also serve on the Resident Advisory Board and are encouraged to participate in their respective resident associations.

The Social Services Division of the Asset Management/Affordable Housing Department serves a vital role at MDHA properties. The Social Services Team will continue in 2016 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, 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.

The Resident Services Division provides a variety of direct social services to the residents and coordinates services offered by other agencies. Service Coordinators are located at each public housing property to provide counseling, information, and referral services.

MDHA's Section 8 Family Self-Sufficiency (FSS) Program combines MDHA and private resources to support residents in transitioning out of public assistance and attaining home ownership 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. 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 last quarter of 2015, 4 participants had purchased homes.

The Community Development Department will work with the MDHA Family Self-Sufficiency Coordinator to provide downpayment assistance to public housing households with incomes not exceeding 80% AMI currently enrolled in the FSS program that are ready to transition into homeownership and financial independence. Applicants will be responsible for obtaining first mortgage financing through an approved FHA, THDA, VA or conforming conventional lender. Financial assistance may be in the form of 0% interest deferred payment loans forgiven on a pro rata basis over a 5-15 year affordability period. The property must be maintained as a primary residence for the duration of the affordability period. At a minimum, FSS households will be required to contribute one percent (1%) of the sales price towards the home purchase. Recipients will also be required to attend an 8-hour Homebuyer Education Course prior to closing provided by a HUD approved Housing Counseling Agency.

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. Planning and program development, in conjunction with the Metropolitan Homelessness Commission and the Nashville/Davidson County Continuum of Care, to implement coordinated entry for all populations. Pilot systems for both

- families and Veterans were designed or launched in 2015. A system for youth/young adults will be designed in 2016, and improvements of the system for individuals/households without children will be identified and implemented in 2016.
2. 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 2016, MDHA intends to prioritize ESG prevention funds to assist persons with histories of homelessness, thereby increasing housing retention among the community of formerly homeless people in Nashville. MDHA has prepared Substantial Amendment 2 to allow that ESG be used for prevention.
  3. Investing in high-performing rapid rehousing. Rapid rehousing programs are achieving strong 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.
  4. Increasing system capacity in outreach and housing navigation services. The high cost of housing in Nashville makes it 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 Rehousing funds to pay for housing search and placement services, and MDHA will encourage such proposals in its 2016 RFA process.
  5. 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 increase the HMIS allocation to 10% of total available ESG funds to: support the development of the database; 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.
  6. Provide funds (subject to applicable cap) to support shelter operations.
  7. Support local efforts to increase permanent supportive housing opportunities.
  8. Collaborate with MHC on a strategic plan to assess and improve the community's system for addressing homelessness.

### **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 and the Mental Health Cooperative have applied for and been awarded program funds for street outreach funds.

State ESG funds, administered by THDA and awarded in late 2014, have expanded outreach by Oasis Center to unsheltered homeless youth. This year, THDA plans to open up the ESG competition to allow nonprofits and units of local government in the ESG

entitled communities of Chattanooga, Memphis and Nashville to apply directly to THDA for resources. Outreach in Nashville could be expanded via this resource.

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 2016, Park Center is expected 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.

MDHA will coordinate with MHC on responding to encampments.

### **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 1,169 year-round emergency beds and 583 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.

### **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. 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 homeless quickly into appropriate housing supports.

To help ease the transition of homeless people into affordable, permanent housing, MDHA has 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 identify to help quickly assess for extreme vulnerabilities and match people with the most appropriate support and housing interventions that are available. As the local market affordable rental housing is extremely tight, MDHA forecasts using Rapid Re-housing funds in 2016 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, as well as in remarks by former HUD Secretary Donovan in the video message on HUD's Homelessness Resource Exchange (HRE) website.

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 a screening tool known as VI-SPDAT and added to a prioritized waiting list maintained by Nashville's coordinated assessment system. MDHA also works with frontline nonprofit staff to streamline the application process for Section 8 and help decrease barriers to this resource.

In 2016, MDHA will use Community Development Block Grant (CDBG) funds 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 100,000 Homes Campaign and 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.

In its 2016 RFA process, MDHA intends to use ESG Prevention funds to enhance the efforts above by assigning priority to collaborative project proposals that target people with histories of homelessness. 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 168 families.

State ESG funds are administered by THDA. The 2015 ESG funding awarded the first \$100,000 of unmatched funds to seven mental health non-profit organizations who fund Regional Housing Coordinators to work with homeless individuals with mental illness. 11 set-aside cities and 21 non-profits were also funded to provide street outreach, emergency shelter, prevention and rapid rehousing services and to enhance HMIS reporting capabilities. THDA is eliminating the \$100,000 set aside with the 2016 ESG program; applications will be open to eligible non-profits and local units of government in all 95 counties. In the October 2015 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 2016, 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.

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 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 2015 and 2016 objectives for the Hospital to Home project:

1. The H2H Program Manager was hired and began this appointment in September 2015;
2. In October 2015 the originating H2H team was awarded \$10,000.00 toward multi-sectoral collaboration. This award money is allocated toward bridge housing placements – an integral level of care toward creating pathways to permanent housing;
3. Drawing from a collective impact framework, a process to identify and formally establish the H2H Steering Committee is underway. H2H Steering Committee members will include individuals representing key stakeholders from: federally qualified health centers, hospitals, housing, community-based organizations, and consumer/peer/advocacy groups. It is anticipated that the H2H Steering Committee will be established by end of January 2016;
4. The H2H project is positioned to establish an academic partnership, within the same timeline of securing the H2H Steering Committee, to ensure that the project is making the intended impact through program monitoring and evaluation activities;
5. Following formation of the H2H Steering Committee, H2H sub-workgroups will be formed and tasked with integrating and coordinating existing healthcare and social services through streamlined and replicable discharge planning activities. In order to achieve this, it is anticipated that the H2H sub-workgroups build upon existing hospital-based discharge planning protocols by, in part, identifying and implementing an integrated data sharing strategy and piloting efforts at local hospitals to link high utilizers with homeless services and housing placements.

- **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 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 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 will implement 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.

## **AP-70 HOPWA Goals – 91.220 (I)(3)**

<b>One year goals for the number of households to be provided housing through the use of HOPWA for:</b>	
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
<b>Total</b>	<b>372</b>

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

### **Introduction**

MDHA hosted a consultation on October 2, 2015 to discuss the affordable housing and fair housing needs/priorities for the 2016 Action Plan. As part of this discussion, participants were asked to list the top three barriers to affordable housing. These are listed below:

1. Lack of affordable housing.
2. Lack of landlords willing to take Housing Choice Vouchers and tough eligibility requirements for potential tenants from landlords including past evictions and criminal records.
3. Limited income of persons served.

The attendees prioritized activities to address affordable housing as follows:

1. Production of new rental units.
2. Rental assistance.
3. Rehabilitation of rental units.

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 B.)

These needs and proposed activities are reflected in NashvilleNext and in 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 is currently creating regulations and tools. More information on that initiative is posted on its [Inclusionary Housing Feasibility and Policy Study page](#). Several MDHA staff, including the Director of Community Development, participates in the Inclusionary Housing Stakeholders Group.

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 anticipates Metro Council approving the first PILOT project in early 2016 to provide an estimated tax abatement of approximately \$385,000 annually for ten years to enable the development of 240 units of affordable housing.

During the 2016 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 July 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 services to public housing residents.

### **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, is working with financial institutions to create a financing mechanism through a Community Reinvestment Act partnership. During 2015, MDHA was able to obtain 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. Additionally, during 2015, MDHA was awarded LIHTC funds under the Public Housing set aside which will assist with the renovation of 226 units in the Levy Place Public Housing Development. MDHA will be submitting 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 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 recently completed 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. Metro Nashville has since allocated an additional \$1 million in funding to be available in a 2016 funding cycle. MDHA also anticipates leveraging a portion of the 2016 HOME funds with dollars being made available from the Barnes Fund.

The Barnes Trust Fund Commission and other partners continue to research ways to capitalize the Trust Fund in order to have a recurring source of funds to use for affordable housing. The Nashville-Davidson Metro Housing Policy and Feasibility Study completed by Economic & Planning Systems, Inc. in December 2015 recommends that a dedicated revenue source of approximately \$10 million a year is required to begin addressing the need.

## **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 addition, MDHA supports Rebuild Together Nashville with its 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 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.

### **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 C 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 be working with the Mayor's Office of Community 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.

As the two main entities charged with utilizing and appropriating public dollars for homeless housing and services, the CoC and the Metropolitan Homelessness Commission (MHC) embarked in 2015 on a joint strategic planning process that will better align decisions about community resource allocations. The end product will be a strategic action plan to build upon Nashville's successes and align with federal initiatives. This targeted investment will pay dividends by streamlining governmental and



non-profit community efforts working toward a shared goal of eliminating homelessness in Nashville. MDHA has allocated CDBG to assist with this effort.

### **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 October 2015 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
- Regularly train service providers using monthly phone calls, emails or a quarterly meeting
- Fill vacancies from one common, prioritized waitlist

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.

In 2016, MDHA staff will 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.

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, & 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 OMB Circulars, 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 2016 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        |
| <b>Total Program Income</b>                                                                                                                                                                   | <b>0</b> |

#### **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. |   |

Specify the years covered that include this Annual Action Plan. 95.00%

**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

**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. A final draft will be prepared, once HUD publishes final regulations for the ESG program.

2. If the Continuum of Care has established centralized or coordinated assessment system 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. In the spring of 2014, the Metro Homelessness Commission hired three VISTA service workers to research coordinated assessment models across the country; they presented their findings to a working group that focused on developing such a system. The Commission began a pilot implementation/ "soft launch" in November 2015 that focuses on prevention for at-risk families.

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).

Awards of ESG funds in Nashville have traditionally been determined by an ESG Review Committee that is distinct from the local CoC decision-making body. In 2016, however, the CoC Performance Evaluation Committee will also serve as the one body to rank both the CoC projects as well as the local ESG proposals, furthering the coordination between the two streams. A Request for Proposals is emailed to 108 individuals, representing over 40 community- and faith-based entities and/or governmental agencies.

The method for selecting ESG subrecipients involves a six-member review committee. Each proposal is rated 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 MHC will have opportunity to provide input on the funding application and a representative will serve on 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 sub-recipient agencies. In 2015, the ESG Review Committee included a man who has experienced homelessness; we are pleased to report good news that he has found a temporary job in another state, yet continued to participate in ranking and scoring discussions via emails with the Homeless Coordinator as well as conference calls during committee meetings.

#### 5. Describe performance standards for evaluating ESG.

In the 2014 CoC competition, Nashville applied for and was awarded a CoC Planning grant. The funds will improve the CoC's ability to evaluate related outcomes primarily by assisting with the development of written protocols that will formalize monitoring, coordination and timeline of local activities funded by both CoC & ESG. Of the 14 local agencies that receive ESG funding, 12 (86%) also operate CoC-funded projects, so the field is primed for cross-fertilization and further coordination. After years of being reviewed on the basis of CoC performance, these agencies are accustomed to gathering data on clients served, and seeing these numbers used as a basis for judging progress on reducing homelessness and increasing housing stability and incomes.

At the December 2014 monthly CoC meeting, agencies worked to set local performance measures for both transitional programs and permanent supportive housing & rapid re-housing projects. With this experience among key stakeholders, Nashville is poised to establish agency-level outcomes, and then translate these to broader community goals for ESG-funded programs as dictated by the HEARTH Act.

As the majority of the funded agencies receive funding from both the ESG & CoC streams, a natural coordination occurs. In addition, the programs have similar goals and both now allow for rehousing/ short-term rental assistance. However, further coordination is needed before the CoC will be fully compliant with the responsibilities outlined in 24 CFR 578.7 of the CoC Interim Rule.

### **Discussion**

Outlined below is the anticipated schedule of tasks related to ESG, CoC & HMIS that MDHA included in its application to HUD for FY2015 CoC Planning funds.

## **ESG**

### 1st Quarter April-June 2016

- Review data to be collected in HMIS for ESG
- Prepare and submit the ESG portions of the CAPER using the eCon Planning Suite in IDIS
- Utilize the members of the CoC Performance Evaluation Committee to also serve as the body that reviews applications from local nonprofits for ESG funding (since the inception of the ESG program in the 1980's, MDHA has staffed an ESG Review Committee that has operated separately from the CoC evaluation process, which has also been staffed by MDHA, since 1991)

### 2nd Quarter July-September 2016

- Refine Policies & Procedures for ESG re-housing assistance
- Establish desired outcomes of ESG-funded projects (in conjunction with CoC evaluation listed above)

## **CoC**

### 1st Quarter April-June 2016

- Create 2016-17 timeline/calendar that meshes CoC and ESG activities
- Hold half-day session with CoC agencies to review actual project performance on housing stability & access to incomes for calendar year 2015. In light of actual performance, consider use of risk adjustment by project type or client type & begin process of setting community targets. (Use NAEH's toolkit called What Gets Measured Gets Done as a guide.)
- Formalize process for feedback from Performance Evaluation Committee to funded agencies, and vice versa
- In consultation with funded agencies, review both Agency Evaluation & Project Evaluation Instruments used in local 2015 ranking process; revise as needed for 2016 cycle
- Prepare and submit the CoC portions of the CAPER using the eCon Planning Suite in IDIS & work with HMIS Coordinator to assure ESG sub-recipients are trained in eCart methods
- Gather Grantees to discuss program compliance vis-à-vis HEARTH Act Interim Rule requirements for both CoC & ESG

### 2nd Quarter July-September 2016

- Hold strategic planning sessions to discuss efficiencies associated with merging of local CoC process with city's Homeless Commission
- Review & update By-laws for CoC, get approved by Governance Committee
- Review & approve written process for selecting officers to serve on CoC Governance Committee

### 3rd Quarter October-December 2016

- Working with Metro Homelessness Commission staff, refine Point-in-Time homeless count methodologies

### 4th Quarter January-March 2017

- Continue to support VISTA workers in work to implement Coordinated Entry System

## **HMIS**

1st Quarter April-June 2016

- Monitor all 14 agencies that manage over 26 local CoC projects (joint visits by HMIS Administrator & CoC Lead staff)
- Complete drafts of privacy plan, data quality plan, and security plan for HMIS; get approval from MDHA legal advisor & board

2nd Quarter July-September 2016

- Continue training agencies on CoC & ESG Data Collection requirements (Universal Data Element changes, verification of all sources of income, etc.)
- Coordinate CoC's HMIS more closely with data collection at largest shelter providers for single individuals (local Mission, Room in the Inn)

3rd Quarter October-December 2016

- Organize meetings of HMIS Steering Committee

4th Quarter January-March 2017

- Adapt HMIS to incorporate Coordinated Assessment data elements desired by community partners.



METROPOLITAN NASHVILLE-DAVIDSON COUNTY, TENNESSEE

**APPENDICES**

**2016-2017 ANNUAL UPDATE  
TO THE  
2013-2018 CONSOLIDATED PLAN  
FOR  
HOUSING AND COMMUNITY DEVELOPMENT**

**PROGRAM YEAR FOUR**

**For the period April 1, 2016 – March 31, 2017**

**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 May 2, 2016



**2016-2017 Annual Update to the 2013-2018 Consolidated Plan (2016 Action Plan)**

**Program Year Four**

**APPENDICES**

**Appendix A – HOME Resale/Recapture Provisions**

**Appendix B - Fair Housing Narrative**

**Appendix C – Actions Planned to Develop Institutional Structure  
Delivery System**

**Appendix D - Summary of Consultations**

**Appendix E – Public Notices**

**Appendix F – Summary of Public Comments and MDHA Responses**

**Appendix G – 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.

<b>If the total HOME investment (resale) or Direct Subsidy (recapture) in the unit is:</b>	<b>The Period of Affordability is:</b>
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”).

$$\text{Fair Return} = (\text{initial investment} + \text{value of improvements}) \times \frac{\text{Median Sale Price}^c}{\text{Median Sale Price}^i}$$

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.

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

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

### 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. These entitlement communities meet 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 must use to assess barrier to fair housing. During the 2016 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 Metro Nashville's entitlement programs and the public housing agency. The assessment will be submitted to HUD in July 2017 and will be used to guide the creation of the next Five Year Consolidated 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 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:

<b>IMPEDIMENT</b>	<b>STRATEGY</b>
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.

**2016 ACTION PLAN  
PROPOSED FAIR HOUSING ACTIVITIES**

<b>Impediment</b>	<b>Affected Group(s)</b>	<b>Activity</b>
<b>1) Scarcity of Affordable Rental Units</b>	Race/color, National Origin, Religion, Sex, Familial Status, Disability	<b>1a)</b> MDHA has allocated the following amounts to produce targeted rental units for the 2016 program year: HOME: \$1,984,782 for New Construction of Rental Housing; CDBG \$550,000 for Rental Rehab. During FY 2016 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.
<b>Estimated Staff Hours Required</b>		2000
<b>Performance Indicator</b>		Activities listed above and units upon completion in a later program year. These activities will produce at least 54 affordable rental units, primarily targeted to households considered extremely low income.
<b>Responsible Entity/Method of Distribution</b>		MDHA, CHDOs, Developers – all funding to CHDOs and Developers awarded through an RFP or application process.

<b>Impediment</b>	<b>Affected Group(s)</b>	<b>Activity</b>
<b>1) Scarcity of Affordable Rental Units</b>	Race/color, National Origin, Religion, Sex, Familial Status, Disability	<b>1b)</b> 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.
<b>Estimated Staff Hours Required</b>		Full time Grant Writer dedicated to this activity
<b>Timetable</b>		Ongoing
<b>Responsible Entity</b>		MDHA



Impediment	Affected Group(s)	Activity
<b>1) Scarcity of Affordable Rental Units</b>	Race/color, National Origin, Religion, Sex, Familial Status, Disability	<b>1d)</b> 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.
<b>Estimated Staff Hours Required</b>		40
<b>Timetable</b>		Ongoing
<b>Responsible Entity</b>		MDHA

Impediment	Affected Group(s)	Activity
<b>2) Scarcity of Affordable Housing Units Accessible to People with Disabilities</b>	Disability	<b>2a)</b> 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.
<b>Estimated Staff Hours Required</b>		40
<b>Timetable</b>		Ongoing
<b>Responsible Entity</b>		MDHA

Impediment	Affected Group(s)	Activity
<b>2) Scarcity of Affordable Housing Units Accessible to People with Disabilities</b>	Disability	<b>2b)</b> 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.

<b>Estimated Staff Hours Required</b>		160
<b>Timetable</b>		Ongoing
<b>Responsible Entity</b>		MDHA

<b>Impediment</b>	<b>Affected Group(s)</b>	<b>Activity</b>
<b>2) Scarcity of Affordable Housing Units Accessible to People with Disabilities</b>	Disability	<b>2c)</b> 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.
<b>\$ for Activity</b>		HOME: \$500,000 New Construction – Homeowners
<b>Estimated Staff Hours Required</b>		40
<b>Timetable</b>		Ongoing
<b>Performance Indicator</b>		Units
<b>Annual Goal</b>		6
<b>Responsible Entity/Method of Distribution</b>		MDHA, CHDOs, Developers – all funding to CHDOs and Developers awarded through an RFP or application process.

<b>Impediment</b>	<b>Affected Group(s)</b>	<b>Activity</b>
<b>2) Scarcity of Affordable Housing Units Accessible to People with Disabilities</b>	Disability	<b>2d)</b> 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.
<b>Estimated Staff Hours Required</b>		0 Additional
<b>Timetable</b>		Ongoing
<b>Responsible Entity</b>		Metro Codes

<b>Impediment</b>	<b>Affected Group(s)</b>	<b>Activity</b>
<b>3) Lack of Fair Housing Education, Testing, and Enforcement Capacity</b>	Race/color National Origin Religion Sex Familiar Status Disability	<b>3a)</b> MDHA has allocated up to \$36,000 in 2016 CDBG public service funds to be awarded to the Tennessee Fair Housing Council. These funds were allocated as part of competitive RFP that was issued in 2015. They continue to provide a comprehensive fair housing testing program in Metro Nashville that was originally started in the 2014 PY. 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.
<b>Estimated Staff Hours Required</b>		1000
<b>Timetable</b>		Program Year 2016
<b>Performance Indicator</b>		Persons
<b>Annual Goal</b>		200
<b>Responsible Entity/Method of Distribution</b>		MDHA and Fair Housing Partner – funds to be distributed through RFP Process for qualified entity to provide services

<b>Impediment</b>	<b>Affected Group(s)</b>	<b>Activity</b>
<b>3) Lack of Fair Housing Education, Testing, and Enforcement Capacity</b>	Race/color National Origin Religion Sex Familiar Status Disability	<b>3b)</b> 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.
<b>Estimated Staff Hours Required</b>		160
<b>Timetable</b>		Ongoing
<b>Responsible Entity</b>		MDHA and Fair Housing Partners

<b>Impediment</b>	<b>Affected Group(s)</b>	<b>Activity</b>
<b>3) Lack of Fair Housing Education, Testing, and Enforcement Capacity</b>	Race/color National Origin Religion Sex Familiar Status Disability	<b>3c)</b> 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.
<b>Estimated Staff Hours Required</b>		160
<b>Timetable</b>		Ongoing
<b>Responsible Entity</b>		MDHA and the Tennessee Fair Housing Council. Partners

Impediment	Affected Group(s)	Activity
<b>3) Lack of Fair Housing Education, Testing, and Enforcement Capacity</b>	Race/color National Origin Religion Sex Familiar Status Disability	<b>3d)</b> 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.
<b>Estimated Staff Hours Required</b>		50
<b>Timetable</b>		Ongoing
<b>Responsible Entity</b>		MDHA and the Tennessee Fair Housing Council Partners

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

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

Impediment	Affected Group(s)	Activity
<b>4) Uneven Distribution of Community Resources</b>	Race/color National Origin Religion Sex Familiar Status Disability	<b>4c)</b> MDHA will institute a point system to be utilized as a scoring factor in evaluating response 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.
<b>Estimated</b>		40
<b>Staff Hours</b>		
<b>Timetable</b>		Ongoing
<b>Responsible</b>		MDHA, CHDOs, Developers.

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

Impediment	Affected Group(s)	Activity
<b>5) Restriction on the Expansion of Protected Classes</b>	Race/color National Origin Religion Sex Familiar Status Disability	<b>5b)</b> 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.
<b>Estimated Staff Hours Required</b>		32
<b>Timetable</b>		Ongoing
<b>Responsible Entity</b>		MDHA

Impediment	Affected Group(s)	Activity
<b>5) Restriction on the Expansion of Protected Classes</b>	Race/color National Origin Religion Sex Familiar Status Disability	<b>5c)</b> 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.
<b>Estimated Staff Hours Required</b>		0 Additional Hours
<b>Timetable</b>		Ongoing
<b>Responsible Entity</b>		Metro Nashville

## APPENDIX C

### 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 D SUMMARY OF CONSULTATIONS

### **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 2016 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 2, 2015, 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 list the top three 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 prioritize needs for fair housing education.

Participants included representatives from Community Homeowner Associations/Activist; housing developers/providers some which are certified as Community Housing Development Organizations (CHDOs); Metropolitan Nashville Homelessness Commission; realtors; private lenders; non-profit service providers.

- *Non-housing community development consultation:* Held on the evening of September 29, 2015, 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, representatives of Bordeaux Hill Neighborhood Association, Martha O'Bryan Center, Metro Social Services, Metropolitan Nashville-Davidson County Parks, Trevecca Urban Farm, Family Children's Service, and Tennessee State University Entrepreneur Center.

- *Homelessness and housing for persons with AIDS consultation:* Held on October 1, 2015, 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 ESG and HOPWA funds. 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 a clinic that provides direct services for HIV clients; a funder and planning facilitator for HIV services; a representative from the Metropolitan Homelessness Commission; and subrecipients of ESG and HOPWA funds.

Following 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 shared the responses from the three consultations and received input for Plan. The representatives emphasized the need for broad-based outreach and utilizing their networks to publicize the Plan.

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 2016 Action Plan.

## **Affordable Housing & Affirmatively Furthering Fair Housing**

### **Comments and Analysis**

MDHA hosted a consultation meeting on October 2, 2015 to discuss the Affordable Housing and fair housing needs/priorities for the 2016-2017 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 19 persons representing the following groups: Community Homeowner Associations /Activists; Housing Developers/Providers, some certified as Community Housing Development Organizations (CHDOs); Metropolitan Nashville Homelessness Commission; non-profit service providers.

For this discussion, attendees were asked to respond to the following series of questions. Cumulative responses are summarized below:

- **List the top three barriers to affordable housing**

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

1. Lack of affordable units.
2. Lack of landlords willing to take Housing Choice Vouchers and tough eligibility requirements for potential tenants from landlords including, past evictions and criminal records.
3. Limited income of persons served

Other barriers mentioned included high cost of land/housing, NIMBYism, accessibility to transit, lack of funding, gentrification, the lack of developer desire to include affordable units, and the lack of supportive services.

- **Prioritize activities to address affordable housing.**

Several responses were given in this category. The top three activities identified by the group were as follows.

1. Production of new rental units.
2. Rental Assistance
3. Rehabilitation of rental units.

Other activities mentioned included production of new homeownership units, rehabilitation of owner-occupied units, housing counseling, and down payment assistance for home purchase.

Additional comments:

“Landlords are getting higher market rate rent than Section 8 can pay, so no units are available for existing voucher holders.”

“Placement of housing should be county-wide.”

“Housing counseling should include financial counseling.”

“Less limitations on rental assistance.”

- **Prioritize subpopulations to be served by affordable housing programs.**

Several responses were given in this category. The top three priorities identified by the group were as follows.

1. ≤ 30% AMI.
2. ≤ 80% AMI.
3. ≤ 50% AMI.

Other subpopulations mentioned were families and special needs.

Additional Comments:

“People with developmental and other disabilities need opportunities for housing that is coupled with an inherent need for support”.

“We are losing much affordable housing every month to “tear downs”. Need to fund repair programs”.

“Increasing homelessness population is leading to camps in such a tight rental market”.

“Folks at 30% AMI are typically most vulnerable. Costs for the State for these people to remain homeless are high (hospital visits, imprisonment, etc.)”.

“Need more units for large families”.

“Include HIV/AIDS in special needs”.

- **Prioritize areas where funds should be targeted.**

Several responses were given in this category. The top three priorities identified by the group were as follows:

1. Areas with substantial changes (increases) in median home values or rents.
2. High cost-burdened areas ( $\leq 50\%$  of households paying  $>30\%$  in housing costs).
3. Transit-oriented development areas.

Other areas mentioned included areas with high concentration of substandard housing, areas in which  $<25\%$  of units are affordable to 80% AMI, and countywide.

Additional Comments:

“MDHA needs an ongoing advisory committee consisting of community activists, organizations and agencies.”

“Reduction of concentration of poverty needs to be a goal.”

“It is important that decisions we make include a vital vision for future diverse neighborhoods accessibility to work.”

- **Prioritize needs for fair housing education.**

Several responses were given in this category. The top three priorities identified by the group were as follows. Some barriers received equal weight based on responses and are noted accordingly.

1. Resident rights.
2. Rental/Realtor practices and Affirmative marketing.
3. Lending practices.

Other need mentioned included design/construction.

Additional Comments:

“With residents rights there also needs to be ongoing education and support”.

“Our community needs to better understand the need for expanded housing efforts”.

“Our community needs to understand the pitfalls of development and the community benefit of countywide housing”.

“The recession and resulting new lending rules cause lenders/banks to be cautious in lending to poor women, commission only workers, etc.”

Additional Comments related to the overall affordable housing and fair housing discussion:

“Provide peer specialists to assist people living with MH and SUD’s in obtaining and maintaining housing”.

“Develop partnership with local community banks to fund development of small affordable housing projects under 25 units”.

“Examine policies (especially local restrictions) that create barriers to housing”.

“Identify State policies (sex offender registry as an example) that need revising because they create barriers to housing”.

“Place a strong emphasis on housing retention for all families (especially low-income). This could be as simple as ensuring people know how/where to find services or/and link people with needed support”.

“We must find funds for affordable housing”.

“Housing is tightly tied to employment. When one can support the other (work close to home) both benefit from stability”.

“A focus must be on priority policies and advocacy to make affordable housing a policy priority”.

“Incentivize landlords to take HCV”.

“Incentivize construction/rehab of fair market rate housing”.

“Focus on a dedicated funding stream for the Barnes Fund”.

“Criminalizing people for life must be stopped”!

“MDHA needs serious assistance with communication and outreach. They are not well thought of in the community”.

“It is time to switch the focus from the urban core to areas outside Briley Parkway”.

“MDHA must have a grass roots community based advisory committee”.

“MDHA must address cluster poverty issues”.

“MDHA must stop unfair TIF redevelopment practices”.

“MDHA’s reputation is poor in the eyes of the community. The community feels neglected”.

“People feel that MDHA only gives significant funding to developers”.

“Communication is very poor to the community”.

“Need creative ways to combine HOME, LIHTC, CDBG, and other funds to generate mixed income neighborhoods. Other cities have combinations of market rate, affordable housing, and public housing”.

“As an agency, does MDHA join in championing county-wide inclusionary zoning policy? I believe it should, including mandatory expectations for developers”.

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 2016-2017 program year and action plan.

## **Non-Housing Community Development**

### **Comments and Analysis**

MDHA hosted a community-based consultation meeting on September 29, 2015 to discuss the Non-Housing Community Development needs for the 2016-2017 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 8 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**

Several examples were given to this question. However, the top three concerns for the group as a whole were:

- Lack of jobs – In this discussion, it wasn't just that not enough jobs were available. It was also a concern that jobs are not available at the appropriate skill levels for those in the most need. Access to skills training, development of work of varying skill levels in locations easily accessible to those in need, and lack of adequate pay for jobs (living wage) were identified as added barriers.
- Education/training – The attendees believed that continued, improved education for those in need is key to reducing poverty. Education included the areas of elementary-high school, post high school, job skills training and financial planning.
- Transportation -- Many individuals in need live in areas where easy access to public transportation for work, school, etc. is limited. This prevents low income residents from participating in opportunities for education, jobs, etc.

Other barriers mentioned included lack of affordable housing, homelessness, greed from the top, lack of mandatory inclusionary zoning to prevent segregation of income, and position in life issues (people have lived in poverty stricken areas all their lives and their parents have as well).

#### **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 public facilities. Public improvements and infrastructure and economic development rounded out the rankings respectively.

There were two additional comments - 1) to include gardening elements to economic development and public service activities and 2) that active engagement by youth/children in a community increases healthy economic development.

### **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 top three activities identified by the group were:

- Youth programs – This included a large focus on providing early and middle aged children access to job training programs and education to prepare them for real world work. Other areas were after school programs, financial management programs and post high school and/or graduation educational opportunities.
- Education and Job training – This included job readiness training, specific job skills training, job access, financial planning and literacy training, etc.
- Healthy food programs – This included healthy foods training, food desert assistance, access to healthy good and outdoor space, how to profit financially with a healthy food/garden based business and access to healthy food amenities.

There was a fourth area that had just as much emphasis. This was access to transportation and/or similar infrastructure activities.

### **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 extremely high areas of poverty concentration should receive the most funding. This was followed by any LMI area and relatively high areas respectively. They want funds spent to those families with the largest need first.

## 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 3 attendees preferred that 75% of the CDBG funds be used towards housing needs, 3 attendees preferred 50% of funds toward housing needs, 1 attendee preferred 50% of fund toward non-housing needs and 1 attendee preferred 75% of funds towards non-housing needs.

### Other Comments

The attendees were asked to provide any additional commentary to the discussion and their responses are listed below:

- “Focus the non-housing funds on the most vulnerable families.”
- “If you had such a long wait list for services, why did all the programs have carryover funds? So, possibly more funds can be put towards housing...hmmm.”
- “Please consider these additional possible uses of CDBG funds –
  - 1) Tutoring to public school students
  - 2) Financial literacy – budgeting, spending and saving.”

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. Youth programs, business assistance and microenterprise assistance that place an emphasis on job skills, healthy food options and education and transportation solutions are key elements to alleviating those barriers. Assistance to those areas with the highest 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 2016-2017 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, as well as other interested members of the public, on October 1, 2015. This event was held in the MDHA cafeteria at 11:30 a.m. and lasted for one-and-a-half hours. Twenty-six people attended, representing 17 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.) Rapid Re-housing
- 3.) Prevention

Although rapid re-housing appeared as a higher priority than prevention, one comment suggested prevention as a good investment because it is less expensive to keep a family housed rather than re-house a family after eviction. Although permanent housing is definitely a need, this is not an ESG-eligible activity, so was not listed.

#### **Prioritize subpopulations to be served by homeless assistance programs.**

- 1.) Families
- 2.) Chronic
- 3.) Persons discharged from corrections programs and institutions

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.

#### **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 – Nashville being the “It” city is creating housing costs that are out of reach for homeless people

- 2.) Landlords will not accept people with Section 8 vouchers or eviction histories
- 3.) High cost of living

**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.) Lack of social supports and coordinated care

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

- 1.) CoC ( 16 votes for Strong, 7 Weak)
- 2.) Housing providers (6 vote for Strong, 17 Weak)
- 3.) Health, mental health & Service agencies (15 votes for strong, 8 for weak)
- 4.) Local and state govt. agencies (13 for Strong, 13 for Weak)

While weak coordination still exists among many of the categories above, it has greatly improved as a result of the Metro Homelessness Commission; the local How's Nashville effort has helped with collaboration.

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

Strengthen governing structure to assure that funds are being optimally utilized to reduce homelessness.

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

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
- Regularly train service providers using monthly phone calls, emails or a quarterly meeting
- Fill vacancies from one common, prioritized waitlist

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

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

To assure more meaningful coordination between housing providers, case managers, hospitals/health care providers and mental health agencies, both before and after housing has been obtained for homeless people, sharing critical data to drive planning and decisions was the primary suggestion. This will entail an open HMIS, a universal, legally acceptable release of medical information that allows agencies to collaborate on care, and formal opportunities for case conferencing and staffings for individuals experiencing homelessness, people who have been recently housed and those who are housing vulnerable.

**Provide one recommendation for increasing coordination among the following:  
“Local and State Government Agencies”**

Consolidate the governance structure to disburse funds strategically, assuring that State government is at the table with Nashville efforts. Specifically, some participants urged consolidation of the CoC and Homelessness Commission, & their establishing goals for families, youth, chronic and vets.

**Describe discharge coordination procedures for the following:**

- 1.) Youth aging out of foster care/state custody (0 Strong, 24 Weak)
- 2.) Persons discharged from health care facilities (0 Strong, 23 Weak)
- 3.) Persons discharged from mental health facilities (0 strong, 24 Weak)
- 4.) Persons discharged from correctional programs and institutions (0 Strong, 24 weak)

Discharge coordination proved an alarmingly low link in this session, and needs to be addressed.

Recommendations made by participants to increase discharge coordination from all four public systems (foster care, health care, mental health and corrections) had many common elements. Generally, responses centered on developing a unified strategic plan to bridge the typical disconnect between the system that is discharging and the social services system in the community, incorporating an open HMIS to build a database that communicates across all sectors and facilitates assessment and referral to appropriate services via a Coordinated Entry System (CES) for the city.

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

Increased communication between the homeless service & housing network and DCS/other key stakeholders for this population; this could mean periodic meetings with local agencies providing services to youth aging out.

**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. The fledgling “Hospital to Home” program at the Homelessness Commission was cited by several participants as one to watch.

**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.

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

Identify individuals experiencing homelessness at entry, perhaps using community-wide Coordinated Entry System (CES) & including correctional facilities as one of the entry points.

**Additional Comments:**

1. Costs of deposits make it a challenge to use a rental voucher
2. Along with rent deposits, residents must have utility deposits (electric, water & gas)
3. Landlords often do not want small children in their units
4. Low/fixed income does not always cover housing costs.
5. If there was more affordable housing or landlords taking Tenant-based rental assistance, this would be top priority.
6. There is a lack options for rehabilitated ex-offenders.
7. Credits issues pose a problem- low credit score or bad credit
8. Limited affordable housing on public transit lines
9. The CoC needs to coordinate with other community initiatives, including How’s Nashville, VA efforts, and need more task groups.
10. The CoC needs to broadcast its activities to the broader community.
11. Pay for website/mobile app to post current info and issues
12. Organize a professional association limited to providers of affordable housing.
13. There should be a housing coordinator at every mental health facility to address discharge.
14. Correctional programs should be more involved in this process.
15. Discrimination and stigma remain issues for persons living with HIV/AIDS.
16. Hospital social workers need training
17. Are programs that receive ESG funds actually “emergency shelters”?
18. Need to coordinate distribution of Rapid Re-housing assistance

19. Nashville lacks Housing First programs
20. Lack of leadership for developing affordable housing for 0-30% AMI
21. Criminal backgrounds are a huge obstacle- for both homeless people and people living with HIV/AIDS.
22. We need a mechanism for identifying gaps and determining who is being served and who is missing.
23. Make HMIS visible to all agencies within the CoC to avoid duplication of records and assure better communication.
24. Housing providers work separately at this time; there is minimal to no coordination. Education and tools should be given to landlords/housing agencies.
25. Things remain competitive among agencies that work with folks experiencing homelessness. There seems to be a goal to have “one wait list,” but not quite there yet.
26. CoC and governments should create and mandate discharge policies
27. There should be more sessions like this that provide front-line staff opportunity to contribute ideas.
28. Align Nashville with the federal Opening Doors priorities.
29. Pathways to healthcare should be streamlined
30. Land cost and constructions costs are high.
31. Ask youth what safety net/programs THEY want to participate in.
32. How about a source document outlining all levels of care, admission criteria, contacts, beds capacity (this was about mental health facilities, but could apply more broadly).

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 2016-2017 program year and action plan.

## **Metro Government Agency**

### **Comments Regarding Action Plan**

MDHA hosted a luncheon meeting in the MDHA Collaboration Center on January 6, 2016 for representatives from the Mayor's offices of Economic and Community Development (ECD), Economic Opportunity and Empowerment (EOE); and Neighborhoods and Community Engagement (NCE) to provide an over view of the 2016 Action Plan and obtain their input on program priorities. There were 6 representatives in attendance. The attendees viewed a short power point presentation detailing the steps taken for the Action Plan thus far as well as a review of the topics and results of previous consultation meetings. The discussion summaries are outlined by topic below:

#### **Economic Development:**

MDHA is considering not funding the microenterprise program in the 2016 Action Plan because funding for a Business Technical Assistance program has been provided to Pathway Lending, a CDFI, and MDHA anticipates that this program will also serve Microenterprise businesses. Representatives from the ECD suggested future collaboration for other economic development programs could include a new or upgraded microenterprise program. The discussion included the HUD federal requirements for CDBG programs and the timeliness requirements for CDBG funds. It also included the various types of activities based on area benefit vs. persons and the pros and cons of each type of activity. Finally, the process for incorporating changes to the action plan and/or future consolidated plan was discussed to determine the best time and method to introduce new programs. It was decided that new economic development initiatives from ECD office could be considered in future program years when they are ready for implementation but that the 2016 action plan would include language indicating that additional programs are being considered to allow for public comment and suggestions.

#### **Section 108 loans:**

A question was raised to ask what the Section 108 loan was for and how that program works. Ms. Hubbard explained that the current Section 108 Loan was a repayment for a previous land acquisition for Nissan Stadium and that it has only 2 or 3 payments remaining. She explained that the Section 108 loan program basically allows Metro to borrow against future CDBG allocations to fund large projects with repayments made from future CDBG annual allocations. She explained that this approach bears careful consideration, because the annual debt repayments mean less funding for other programs each year. Ms. Hubbard explained that it could be possible for Section 108 funds to be borrowed for Economic Development projects involving private developers that could create jobs and that these types of loans could be repaid with interest by the private developers thus not reducing funds for other CDBG programs.



### **CDBG Homeowner/Rental Rehabilitation programs:**

Representatives from the EOE office stated they realized that the need for housing rehabilitation programs was high, but asked if there was data available that could be used to analyze and quantify the need. Ms. Hubbard stated that the 2013 – 2018 Consolidated Plan contained a needs assessment and additional data could be obtained by viewing Community Planning Development (CPD) maps. Ms. Hubbard explained that MDHA operates the current homeowner rehabilitation program as a grant program, but that due to current market conditions including gentrification, consideration was being given to changing the program to either forgivable or due on sale loans with deed restrictions that would ensure the properties continue to remain in the affordable housing inventory to prevent homeowners from using federal dollars to make repairs and then sell the property. The concern with this type of change is the loss of participation from elderly homeowners that do not want to have liens placed on their properties.

Ms. Hubbard explained that MDHA currently operates the Rental Rehabilitation program as a low interest loan program. She explained that it had always been popular with Section 8 landlords as they used it to make repairs to their properties in order to meet Section 8 housing standards in order to be able to lease the properties to Section 8 voucher holders. However, in the current market, landlords can rent their properties at market rates to non-voucher holders without making repairs or upgrades; therefore MDHA is considering providing funds as a grant to landlords that would agree to make the properties available for lease by Section 8 voucher holders for a minimum of 10 years. It was decided that housing rehabilitation programs merited detailed, exclusive discussions at a later date to talk through some of the issues of program operations and design.

### **Distribution of allocated funds and capacity:**

Metro staff asked how MDHA manages to determine the breakdown between funding one large program with most of its allocation versus funding several small programs. MDHA explained that the programs that are funded are based on public input and there being staff or nonprofit capacity in the community to administer the programs. Ms. Hubbard explained that other than housing rehabilitation programs which are managed directly by MDHA, most of the other programs are administered through third party nonprofit subrecipients with MDHA providing oversight and monitoring of the programs. Before, introducing new programs, MDHA takes a detailed look to make that there is capacity for administering a program and will not fund programs that cannot be effectively managed.

### **Citizen participation:**

Ms. Hubbard provided information on the methods used by MDHA to provide the public access to the annual action plan and afford them the opportunity to comment on the same. She asked for help from Metro government to increase public participation. One

suggestion was to have the Action Plan or a link to the Action Plan on the Metro Government website in addition to MDHA's website. It was also suggested that copies of

the action plan be made available at local libraries. A question was asked on how public input was received prior to the release of a draft plan. MDHA explained that 3 stakeholders meetings were held in the fall to obtain input prior to releasing the draft and that comments from previous action plan and performance report public hearings were also included. Staff from the NCE office suggested that a much more generalized summary be made available for the public library copies and/or for email notices that would be easier for the general public to read and understand as the complete action plan is almost 200 pages and has a lot of numbers and data that can bog down readers. It was felt that a summarized version could garner more interest in commentary and/or a request to view the larger document for further review.

### **Summer Youth programs:**

OEO staff stated that one of the Mayor's initiatives for Nashville involves expanding youth internships and work opportunities and that they are working on programs to accomplish the same. Since these programs are still in the planning stages, MDHA will work with Metro to expand the focus of the current summer youth programs to include these new priorities in future years as these program are ready for implementation. Ms. Hubbard explained that the current program already has a focus on jobs and careers and this would be continued. Also, MDHA reviews the program each year to determine how the next year's funding might be adjusted to better serve the youth in Davidson County and achieve the desired goals. MDHA is currently reviewing the program in anticipation of its funding release for 2016.

### **HOME programs:**

There was a lot of discussion regarding how MDHA HOME funds may be used to collaborate with the Metro Barnes Housing Trust fund and other housing programs in future years. For homebuyer programs, MDHA will consider placing all funding in one overall homebuyer activity. This allows flexibility to assess the need and amount of funding for various activities, such as down payment assistance. MDHA is also researching the needs of homebuyer programs versus rental programs in the current market. The recent years have shown a need for more rental programs. MDHA is trying to determine if this will hold or if a shift to homebuyer needs is in the future horizon. The Mayor's office detailed needs for homebuyers in the 60-80% below AMI range. MDHA will collaborate with Metro to determine how to best address this population while maintaining the HUD requirements for funds spent on 60% and below AMI beneficiaries. This will be discussed in further detail in future meetings with the Mayor's office. Finally, the standard RFP process for procurement of HOME funded projects was discussed. This could possibly be adjusted to a year round application process or other options to best meet HOME commitments which also provide developers funding when they need it most. MDHA will research this in more detail.

**CHDO capacity building:**

In addition to procurement processes, capacity building training for developers and CHDOS was also discussed. Previous training workshops provided by MDHA were explained. Metro officials want to look for additional methods to increase the developer and CHDO capacity to include opportunities for more businesses in future programs. Ms. Hubbard explained that CDBG funds for nonprofit capacity building could be used for this purpose.

## APPENDIX E PUBLIC NOTICES

### PUBLIC NOTICE

#### REQUEST FOR PUBLIC COMMENT AND NOTICE OF PUBLIC HEARINGS

#### SUBSTANTIAL AMENDMENT 2 TO THE 2013-2018 CONSOLIDATED PLAN FOR HOUSING AND COMMUNITY DEVELOPMENT AND 2016-2017 ANNUAL UPDATE FOR PROGRAM YEAR FOUR (2016 ACTION PLAN)

**Public Hearings:** The Metropolitan Development and Housing Agency (MDHA) will host three public hearings on the draft Substantial Amendment 2 to the 2013-2018 Consolidated Plan for Housing and Community Development and 2016-2017 Annual Update for Program Year Four (2016 Action Plan) on:

**Wednesday, April 6, 2016, 11:30 a.m.**  
MDHA Collaboration Center  
701 South Sixth Street  
Nashville, TN 37206

**Saturday, April 9, 2016, 10:00 a.m.**  
J. Henry Hale Apartments Community Room  
1433 Jo Johnston Avenue  
Nashville, TN 37203

**Tuesday, April 12, 2016 5:30 p.m.**  
Levy Place Community Room  
303 Foster Street  
Nashville, TN 37207

**Public Comment Period:** Beginning Monday, March 21, 2016, the draft Substantial Amendment 2 and 2016 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](http://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 Thursday, April 28, 2016. Comments may be submitted electronically at [consolidatedplan@nashville-mdha.org](mailto: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 Substantial Amendment 2 to the 2013-2018 Consolidated Plan for Housing and Community Development and the 2016-2017 Annual Update for Program Year Four (2016 Action Plan). The draft Substantial Amendment allows Emergency Solution Grant funds to be used for homeless prevention activities.

The 2016 Action Plan describes community needs and funding priorities for the 2016-2017 program year (April 1, 2016 through March 31, 2017) 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 2016 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
2016 Allocation	\$4,559,221.00	\$1,819,757.00	\$416,420.00	\$942,082.00
Estimated Program Income	\$ 300,000.00	\$ 230,000.00	\$ -	\$ -
Carryforward 2015 Funds	\$1,280,000.00	\$ 755,000.00	\$ -	\$ -
Reprogrammed 2015 Funds	\$ 449,954.00	\$ -	\$ -	\$ -
<b>TOTAL</b>	<b>\$6,589,175.00</b>	<b>\$2,804,757.00</b>	<b>\$416,420.00</b>	<b>\$942,082.00</b>

2015-2016 Proposed Allocations:

CDBG	
Project Type	Proposed Budget
Acquisition & Related Activities	\$ 230,082.00
Administration & Planning	\$ 971,840.00
Economic Development	\$ 870,299.00
Housing	\$2,781,954.00
Public Facilities & Infrastructure	\$1,005,000.00
Public Services	\$ 680,000.00
Other: Nonprofit Capacity Building	\$ 50,000.00
<b>TOTAL</b>	<b>\$6,589,175.00</b>

HOME	
Project Type	Proposed Budget
Administration	\$ 204,975.00
Homebuyer Programs	\$ 500,000.00
Homeowner Rehabilitation	\$ 115,000.00
Rental Programs	\$1,984,782.00
<b>TOTAL</b>	<b>\$2,804,757.00</b>

ESG	
Project Type	Proposed Budget
Administration	\$ 31,000.00
Emergency Shelter & Transitional Housing	\$ 180,000.00
HMIS	\$ 15,000.00
Rapid Re-Housing	\$ 112,420.00
Street Outreach	\$ 38,000.00
Prevention	\$ 40,000.00
<b>TOTAL</b>	<b>\$416,420.00</b>

HOPWA	
Project Type	Proposed Budget
Administration	\$ 94,200.00
Facility-Based Operations	\$ 172,882.00
Short-term Rent, Mortgage & Utilities	\$ 250,000.00
Supportive Services	\$ 425,000.00
<b>TOTAL</b>	<b>\$ 942,082.00</b>

**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.

如果需要本通知的中文翻口, 口打口口 615-252-8505

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

للحصول على ترجمة عربية لهذا البيان، يرجى الاتصال ب: 615-252-8505

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

**Statement of Non-Discrimination:** MDHA does not discriminate on the basis of age, race, sex, sexual orientation, gender identity, genetic information, color, national origin, religion, disability or any other legally protected status in admission to, access to, or operations of its programs, services, or activities.



**AVISO PÚBLICO**

**SOLICITUD PARA COMENTARIOS PÚBLICOS Y AVISO DE AUDIENCIAS PÚBLICAS**

**ENMIENDA SUSTANCIAL 2 AL PLAN CONSOLIDADO DE 2013 A 2018 PARA VIVIENDAS Y  
DESARROLLO COMUNITARIO**

**Y**

**ACTUALIZACIÓN ANUAL DE 2016 a 2017 PARA EL CUARTO AÑO DEL PROGRAMA (2016 PLAN  
DE ACCIÓN)**

**Audiencias Públicas:** La Agencia de Desarrollo y Vivienda Metropolitana (MDHA) realizará tres audiencias públicas en el borrador del Enmienda Sustancial 2 al Plan Consolidado de 2013 a 2018 para Viviendas y Desarrollo Comunitario y la Actualización Anual de 2016 a 2017 para el Cuarto Año del Programa (2016 Plan de Acción) el:

**Miércoles, 6 de abril de 2016 a las 11:30 a.m.**

**MDHA Collaboration Center  
701 South Sixth Street  
Nashville, TN 37206**

**Sábado, 9 de abril de 2016 a las 10:00 a.m.**

**J. Henry Hale Apartments Community Room  
1433 Jo Johnston Avenue  
Nashville, TN 37203**

**Martes, el 12 de abril de 2016 a las 5:30 p.m.**

**Levy Place Community Room  
303 Foster Street  
Nashville, TN 37207**

**Periodo de Comentarios Públicos:** Comenzando lunes, el 21 de marzo de 2016, el borrador del Enmienda Sustancial 2 y el Plan de Acción de 2016 estarán disponibles para exanimación y comentario público. Los miembros del público pueden descargar copias del sitio de web del MDHA al [www.nashville-mdha.org/consolidated-plan](http://www.nashville-mdha.org/consolidated-plan) o pueden solicitar copias contactando al Departamento de Desarrollo Comunitario de la MDHA al 615-252-8505 o el TDD al 615-252-8599. También, habrán copias disponibles en el Departamento del Desarrollo Comunitario de la MDHA, ubicado en 712 South Sixth Street, Nashville, TN 37206, entre las horas de 7:30 a.m. a 4:00 p.m., lunes a viernes. La MDHA recibirá comentarios públicos hasta las 4:00 p.m., hora del centro, jueves el 28 de abril de 2016. Se pueden presentar comentarios al [consolidatedplan@nashville-mdha.org](mailto:consolidatedplan@nashville-mdha.org), enviado por fax al 615-252-8533 (Attention: Consolidated Plan), enviado por correo al MDHA Community Development Department, Attention: Consolidated Plan, P.O. Box 846, Nashville, TN 37202, o presentado en persona al MDHA Community Development Department, Attention: Consolidated Plan, 712 South Sixth Street, Nashville TN 37206.

**Propósito y Resumen:** La MDHA ha preparado para presentación al Departamento de Vivienda y Desarrollo Urbano de los EE.UU. un borrador el Enmienda Sustancial 2 al Plan Consolidado de 2013 – 2018 para Viviendas y Desarrollo Comunitario y la Actualización Anual de 2016 a 2017 para el Cuarto Año del Programa (Plan de Acción de 2016). El borrador del Enmienda Sustancial 2 permite que se use fondos de la Subvención de Solución de Emergencia para actividades para la prevención de aquéllos sin hogar.

El Plan de Acción de 2016 describe necesidades comunitarias y prioridades de subvención para el año del programa de 2016-2017 (1 de abril de 2016 al 31 de marzo de 2017) y sirve como la solicitud de Nashville Metropolitano-Condado de Davidson para recibir fondos para los siguientes programas: Subsidios Globales para el Desarrollo Comunitario (*Community Development Block Grant, CDBG*), el Programa de Asociación para Inversiones en Vivienda (*HOME Investment Partnerships Program HOME*), la Subvención de Soluciones de Emergencia (*ESG*) y Oportunidades de Vivienda para Personas con SIDA (*Housing Opportunities for Persons with AIDS, HOPWA*). Asignaciones propuestas de subvención, se intenten tratar de necesidades de prioridad identificadas en el Plan Consolidado de 2013 a 2018, como ha sido enmendado, y para dar beneficio a unidades familiares de ingreso bajo-moderado, y áreas. Los detalles acerca de actividades específicas para ser fundados son proporcionados en el Plan de Acción de 2016.

**Prioridades de Subvención:**

- Aumentar el suministro de viviendas asequibles
- Fortalecer colaboración entre un red de proveedores de servicios
- Aumentar acceso a opciones de alimentos saludables
- Disminuir el número de aquéllos sin hogar
- Desarrollar e implementar estrategias basadas en el lugar para desarrollo comunitario
- Proporcionar programas del verano para niños y jóvenes de ingreso bajo-moderado
- Proporcionar asistencia de vivienda para personas con VIH/SIDA
- Hacer progreso verdadero en vivienda justa

**Recursos Anticipados:**

	CDBG	HOME	ESG	HOPWA
Asignación de 2016	\$4,559,221.00	\$1,819,757.00	\$416,420.00	\$942,082.00
Ingreso Estimado del Programa	\$ 300,000.00	\$ 230,000.00	\$ -	\$ -
Fondos para llevar adelante de 2015	\$1,280,000.00	\$ 755,000.00	\$ -	\$ -
Fondos reprogramados de 2015	\$ 449,954.00	\$ -	\$ -	\$ -
<b>TOTAL</b>	<b>\$6,589,175.00</b>	<b>\$2,804,757.00</b>	<b>\$416,420.00</b>	<b>\$942,082.00</b>

**Asignaciones Propuestas de 2015-2016:**

CDBG	
Tipo de Proyecto	Presupuesto Propuesto
Adquisición y Actividades Relacionadas	\$ 230,082.00
Administración y Planificación	\$ 971,840.00
Desarrollo Económico	\$ 870,299.00
Vivienda	\$2,781,954.00
Instalaciones Públicos e Infraestructura	\$1,005,000.00
Servicios Públicos	\$ 680,000.00
Otro: Aumento de Capacidad de Organización sin fines de lucro	\$ 50,000.00
<b>TOTAL</b>	<b>\$6,589,175.00</b>

HOME	
Tipo de Proyecto	Presupuesto Propuesto
Administración	\$ 204,975.00
Programas del Comprador de Casa	\$ 500,000.00
Habilitación del Dueño de Casa	\$ 115,000.00
Programas de Alquiler	\$1,984,782.00
<b>TOTAL</b>	<b>\$2,804,757.00</b>

ESG	
Tipo de Proyecto	Presupuesto Propuesto
Administración	\$ 31,000.00
Albergue de Emergencia y Vivienda Transicional	\$ 180,000.00
HMS	\$ 15,000.00
Rápido Realojamiento	\$ 112,420.00
Participación en la Calle	\$ 38,000.00
Prevención	\$ 40,000.00
<b>TOTAL</b>	<b>\$416,420.00</b>

HOPWA	
Tipo de Proyecto	Presupuesto Propuesto
Administración	\$ 94,200.00
Operaciones Basadas en la Instalación	\$ 172,882.00
Alquiler de Corto Plazo, Hipoteca y Servicios Públicos	\$ 250,000.00
Servicios de Apoyo	\$ 425,000.00
<b>TOTAL</b>	<b>\$ 942,082.00</b>

**Solicitud para Asistencia:** La MDHA hace cada esfuerzo para proporcionar asistencia razonable para ayudar a personas con discapacidades. Cualquier persona que necesite asistencia para acceder esta información o que tenga otras necesidades que requieran asistencia especial puede contactar al 615-252-8555 o al TDD al 615-252-8699.

如果需要本通知的中文翻口, 口打口口 615-252-8505

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

للحصول على ترجمة عربية لهذا البيان، يرجى الإتصال بـ: 615-252-8505

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

**Declaración de No Discriminación:** La MDHA no discrimina en base a edad, raza, sexo, orientación sexual, color, nacionalidad de origen, religión, discapacidad, ni cualquier otra condición protegida legalmente al admitir, acceder a las operaciones de sus programas, servicios o actividades



## APPENDIX F

### SUMMARY OF PUBLIC COMMENTS AND MDHA'S RESPONSES

#### **Comments from the Public Hearing held on April 6, 2016**

Q: I thought that there was a section of the Action Plan discussed the initiative to reduce the criminalization of homeless, and I would like to hear more details please.

A: That initiative is not included in the scope of Action Plan.

Q: Isn't the reduction of criminalization of homeless a new requirement under HUD?

A: It may be a requirement that MDHA will have to address with its next 5 year consolidated plan, but it is not required nor addressed in this year's action plan.

Q: On slide 26, what is the \$505,000 under economic development going towards in the 2016-2017 year?

A: That is actually a repayment to HUD for a Section 108 Loan that was obtained in the late 1990's; it is not a program. The annual allocation always includes this payment. We have about 3 years left on the loan repayment.

Q: Your outreach to garner more input from the public regarding the action plan – does this include any door-to-door, phone trees, direct mailing, free lunches, etc.?

A: We cannot use any federal funds for food purchases. So, unfortunately no free lunches. We do not do door-to-door, phone, or direct mailing. However, we email over 300 members of the community, stakeholder, and program partners as well as our council members, and we ask them to help us spread the word. We also publish the notice in 3 news publications, including minority and Spanish papers. We posted notices on social media such as Facebook and Twitter and on our website. This public hearing is also being recorded by Metro3 and will air on Nashville's public access channel. We will also post a link to this public hearing footage on our website via YouTube.

C: Well I just thought those might be some additional options to get the word out to all citizens of Davidson County.



R: Thank You. We always appreciate new ideas and thoughts to improve our outreach efforts.

Q: Fair Housing – is that an issue in Davidson County still today?

A: Fair Housing is always a big issue. However, we have seen the overt housing discrimination give way to more subtle methods. This makes testing and educating citizens of their rights all the more important as many do not realize they are being discriminated against.

Q: Please explain how you will handle the information and questions you receive regarding the action plan.

A: Every question/comment from the public regarding the action plan will be summarized and included in the appendix to the action plan. If it is a comment or question asking MDHA to make a change to something in the plan, MDHA will answer as to whether the change was or was not incorporated and will state why or why not.

Q: Regarding Rapid Re-housing – this is usually short term assistance. Are you offering 90 days or what level of assistance are your offering under this program?

A: It is medium term rental assistance from 4 to 24 months. By and large, most agencies are utilizing the assistance for less than 1 year total per client.

Q: When they do have rapid re-housing, does that go directly to the landlord and how do you determine how long each client gets assistance?

A: Subrecipient agencies receive funding for rapid re-housing. They issue a check directly to the landlord for the client assisted. The term varies, depending on each client's individual case as to how long they are assisted under the program.

Q: Regarding HOPWA, slide 39 – facility based housing operations – can you explain what line item is funding.

A: That funding is generally awarded to Urban Housing Solutions, a non-profit that provides subsidized housing to persons with HIV/AIDS, and it pays for the operation of that housing.

Q: HOME funds – if a developer discovers a project for multiple years – if they receive funds for one year, can they piggy back the next phase to that project?

A: HOME funds are awarded on a project basis. So, when a developer proposed a project and received funds – it is only for that project as proposed. While it is understood that the project will not begin in the same year as funding is awarded, a developer cannot come back in subsequent years and apply for new or additional funding for the same project.

Q: If the funds are available and a developer proposed for 100 units and receives funding and then in a subsequent year wants to add an additional 100 units, is that an allowable activity?

A: The activity would probably be allowed under HOME [depending on the subsidy limit]. However, I do not know that as a matter of policy if MDHA would fund the subsequent units. It has not come up before.

Q: Are HOME funds dedicated to 60% AMI or less?

A: Yes.

Q: And there's no funds allocated for Homebuyer?

A: There is \$500,000 in HOME funds allocated for homebuyer programs, and that is for households up to 80% AMI.

Q: The allocation set aside for Rental Assistance Demonstration under HOME, what does the section regarding funding potentially being used by MDHA development mean?

A: [\$500,000 is allocated for MDHA to use for the redevelopment of public housing under the RAD program.] [As for the other funds programmed for rental projects] the HOME program has strict timelines for obligation and commitment. That is plan B our competitive process does not commit all HOME funding in a timely manner under HUD rules. This option gives MDHA some flexibility to meet the commitment. However, the competitive process is the primary plan/goal for commitment of funds.

Q: You said an open application concept is being considered?

A: Yes, we are hoping for input from developers on utilizing this process instead of the RFP process.

C: Making HOME funds available as needed or open window is a great idea. It makes the financing element much easier. I also appreciate all of the tables in the presentation with the allocations. On the carryforward table, could you break it down from what is committed or not in future presentations/years?

R: The carryforward is not committed/obligated yet. However, it has been programmed for the same activity as the prior year, but we do not have those funds under contract.

Q: How was the \$4.5 million dollars for CDBG allocated?

A: CDBG project budgets start on slide 26, and budgets for specific activities follow.

Q: Could you expand on the \$2 million dollars for housing under CDBG?

A: That is detailed under the slides for CDBG housing, which are on slide 30 of the PowerPoint presentation.

Q: You seem to have \$1.5 million allocated to homeowner rehab – that seems to be a substantial part of the allocation.

A: The \$1.5 million includes program income and reprogrammed funds as well.

C: That seems to be quite a substantial portion of the CDBG funding. You are talking about people who have equity in their homes. I would have concerns that maybe they should get a home equity loan, line of credit or a reverse mortgage to cover their homeowner repairs rather than spend CDBG funds that could go to those with more need. I have concerns that the eligibility would allow those with much more moderate incomes to received funds. As someone who advocates for those who are needier, it is a concern.

A: The maximum household income allowed under the homeowner rehab program is 80% AMI. No one above that level receives funding. Also, we target those that are elderly, disabled or considered very low income – which is only 50% AMI for the household. This is our most popular and highly demanded program that we operate. We continually obligate our funds within a couple months of opening the program and still have those who need assistance. The demand for assistance never goes down. It is a vulnerable population that does not have the means to pay for these extra repairs and rehab to the homes.

C: Well, I feel there are people with a lot of equity in their home and they have more means than others. I object to that amount being used for that program. You are helping people who may have a substantial amount of equity that can get loans, etc. as opposed to those without even a roof over their heads.

R: Thank you for your comments and concern.

## **Comments from the Public Hearing held on April 9, 2016**

Q: Is the \$200,000 for CDBG acquisition to be used in conjunction with CHDO projects?

A: No, this is set aside for MDHA to purchase vacant or blighted properties to use later for housing or a neighborhood facility. A portion is set aside for acquisition of properties around Napier/Sudekum public housing if MDHA is successful in receiving a Choice Neighborhoods Planning Grant.

Q: How do you apply for HVAC?

A: It is the same application as for Homeowner Rehab, so you would go through those channels [at MDHA].

Q: Is the application online?

A: No.

Q: What are the restrictions on the rental rehab projects?

A: There will be a ten year affordability deed restriction for the CDBG rental rehab program. Assistance will be treated as a loan. However, if the landlord commits to accepting Section 8 vouchers, then the funding will be a grant.

Q: When you say public facilities – do you mean training facilities?

A: The facility must be a neighborhood facility that is open to and serves the residents in low income areas, such as a community center, not a business facility.

Q: I know of a couple of areas in need for residential sidewalks. Who would actually submit the applications for funding for residential infrastructure for sidewalks?

A: MDHA is working with the Mayor's office directly on the locations for sidewalks. Metro has already surveyed many areas for potential construction. One caveat is that CDBG funding will not be used to place sidewalks on streets where right-of-way easements are required. If you have suggestions for locations, please contact the Mayor's office as they have not finalized locations yet.

Q: Would a county-wide mobile food market be eligible under the healthy foods initiative?

A: No. The healthy foods initiative program is restricted to food deserts located in areas where at least 51% of the households have incomes at or below 80% AMI. Therefore, we cannot sponsor a county-wide program.

Q: Would a homeless person who has a delinquent or old electricity or utility bill that is preventing them from getting into new housing be eligible to use the homeless vouchers program?

A: No. We cannot pay arrearages. The homeless voucher program through CDBG is for first month's rent or security and utility deposits.

C: I like the idea of the open application process for HOME. It allows for much more flexibility and opportunity for developers.

R: Please note that while MDHA wants to try this process, we are still bound by a tight turnaround time for commitments to HUD. Therefore, we may still have to release an RFP for funds if there are not enough applications submitted and funded during the application window.

Q: Would any lots from MDHA be offered as a part of the open application process as is normally included in an RFP? Maybe have a list of lots available?

A: We will consider the release of lots during the application process.

C: The time frame of the open application funding could be crucial. Most developers would be using several funding sources and some other agencies, such as THDA may have requirements for funding much like MDHA. This could make it tricky to get all of the funding sources to line up well. However, it is still a much better option to have open applications for 6 months than having to have a project ready one random time a year.

R: Yes. We are hoping to work to making funding opportunities fall in line with other source time tables so that developers can get the most funding available in a timely manner. We hope to roll this program out in July.

Q: Under HOME Rental, is the \$275,000 CHDO set aside included in the overall rental budget or is it separate?

A: It is separate. We may release all of the funds at one time for applications. However, the \$275,000 will remain for CHDOs and not be allowed to be used under other developer projects. Of course, a CHDO can request more than the \$275,000 set aside.

C: It makes more sense to open all of the funds for projects rather than a separate application for the \$275,000 set aside and then the rest of the funds. Most projects will be over or barely able to stay within the set aside amount, so additional funding would be requested regardless.

R: Thank you.

Q: Does the requirement to serve those below 60% AMI apply for rental projects?

A: Yes [for HOME-funded rental projects].

Q: Do we still have to submit the massive CHDO certification documentation under the proposed open application process?

A: Yes. If you are applying for CHDO set aside funds, you must submit your CHDO certification documentation. However, unlike previous years, you will not apply for certification until you apply for an actual project. We will not have the CHDO

certification process that requires submittal of the certification documentation even if you do not apply for funds during the program year.

Q: Are we under the same income requirements and affordability restrictions of 20 years, etc.?

A: Yes.

Q: On CDBG, do you still do the neighborhood facility projects on a neighborhood application basis? If so, if a neighborhood has received funds for a project in the past, can they come back in for a new project?

A: We do not fund those neighborhood-based projects anymore. The place-based strategy incorporated in this 2013-2018 Consolidated Plan replaced that process.

Q: What will the prevention activities under ESG encompass?

A: We hope there will be collaboration between agencies that would take referrals from other agencies. We would like to see some analysis of those helped who have shown a chronic history of homelessness or extremely at risk of homelessness. We would like to reduce recidivism.

Q: Does MDHA have a program to address the needs of those homeless who have been previously incarcerated? For example, THDA gives priority points to developer applications to those who state they will provide opportunities for formerly incarcerated individuals.

A: MDHA does not have a direct program for that currently. HUD has released new guidance for developers which details that arrests cannot be used as a means to prevent someone from obtaining housing. However, several of the ESG subrecipients that receive funding through do have programs for those individuals. MDHA applications currently focus on those groups as detailed in the Consolidated Plan, which includes the elderly, disabled and very low income.

Q: Under HOPWA facility based operations – is there a facility available that provides such housing for persons with HIV/AIDS?

A: Yes. One agency, Urban Housing Solutions, has a facility that provides housing for persons with HIV/AIDS.

Q: If a developer or landlord is willing to provide housing for persons with HIV/AIDS, how do they get that information to potential clients without asking their medical status?

A: The developer or landlord contacts MDHA or other agencies that provide services to that population and the agencies let it be known to their clients that space is available. Then the clients would seek out the developer or landlord for assistance.

C: I notice Homebuyer new construction is set at \$500,000. Based on the limits for buyer income and how much we can sell, it is becoming very difficult to make these projects work. You can hardly complete a project, especially if you have to acquire the land, and

sell under the capped limits and break even.

R: Yes, this is a problem and this is why MDHA is not placing a lot of funding into this type of activity. We want to be able to offer it to the public, but we realize it may be difficult to develop viable projects in the current housing market as prices continue to rise. HOME does allow for lease to purchase options. This is something that could be considered in the future. However, it would require a long range plan and active updates on the developers' part to make it viable.

Q: Under the open application process, can a developer come in with affordable units that are included as part of a larger, mixed income project?

A: Yes.

### **Comments from Public Hearing held on April 12, 2016**

Q: For the project based vouchers, how many are available? Is a certain portion of those VASH vouchers?

A: We have about 200. They are not VASH vouchers at this time.

Q: For CDBG rental rehab, you said it could be used for acquisition of land for rental units. Is there any possibility of using those funds for new construction of rental units?

A: Under HUD rules, CDBG is not allowed for new construction of housing. It can only be used for acquisition or the rehab of units.

Q: Under HOME, you said \$275,000 for CHDOs and \$500,000 RAD – what if those two categories are not applied for during the year?

A: I'm sure MDHA will utilize the \$500,000 for RAD. Under HUD rules, MDHA must allocate a minimum of the \$275,000 for CHDOs. We normally do not have problems with applications for this program.

Q: For affordable housing – I see it is one of your priority outcomes under the five year plan. I see as a non-profit for child care, most of our clients have to move further and further out of the city core to find affordable housing. How can we find them affordable housing inside the core of the city?

A: Unfortunately, HOME funding has been cut in half over the last 10 years for housing. We only have \$1.8 million in HOME funds this year. That doesn't go a long way to address it. The Mayor of Nashville-Davidson County has announced plans to help address affordable housing through her office as well.

Q: Funding for non-profits that support clients in public housing for rehab – can you expand on that please?

A: MDHA will issue an RFP for funds available to non-profits to rehab their facilities for use by low income residents in the neighborhood. This funding opportunity should be released in July.

Q: On the summer youth programs, do you more than one program in a specific geographical area?

A: Yes. We do not limit the number of programs to specific geographical areas in the county.

Q: Is the healthy living and/or career focus requirement applicable to summer youth programs for ages 5-12?

A: Yes. Those requirements apply to all funded summer youth programs.

### **Comments Submitted in Writing**

- *The following comment was submitted by email on March 23, 2016:*

Dear MDHA,

LDG Development wants to take this opportunity to thank MDHA for all their work creating much needed affordable housing in Nashville. We have really enjoyed working with MDHA on our partnership on Paddock at Grandview. We hope to continue this great relationship on many more future affordable developments in Nashville.

LDG has the following comments:

- Very reassuring to see the creation of more affordable housing as the #1 goal for 2016, with \$2,982,954 of CDBG and \$2,599,782 of HOME
- In the application of CDBG and HOME funds to create affordable housing, could there be more weight or points in scoring put towards # of affordable units created per CDBG/HOME fund dollar leveraged? We see that we can create upwards of 200+ units of 60% AMI rents and only use anywhere from \$5000-\$10,000 of HOME funds per unit.
- LDG would like to see weight put on the creation of brand new affordable housing over preservation of current affordable. We find that new construction is much more desirable for affordable residents, lasts longer, and is much more competitive with market rate housing for affordable residents who are paying too much of their income for rent.
- Unfortunately with the taxation of LIHTC credits by the Nashville-Davidson County Tax Assessor, HOME/CDBG funds will not be able to create as many affordable units without the leveraging of a PILOT. There should possibly be language to include that HOME/CDBG funds awarded for affordable housing will also get a PILOT award once completing application and getting board approval.

R: HOME is intended to be gap financing for affordable housing development; all HOME-funded projects must have at least a 25% match, and we encourage more leverage. However, several factors are considered in determining whether a project should be considered for funding, such as the population to be served and proximity to services and transit. Each project will be considered according to its merits.





HOME is the only grant that can be used for affordable housing. This year, most HOME funding is programmed for new construction, and rehab programs are funded through CDBG, which cannot be used for new construction.

PILOT authority for tax credit projects is granted through the Tennessee Legislature and does not extend to CDBG- or HOME-funded projects. T.C.A. §67-5-207 provides certain exemptions for housing of low income persons with disabilities or low income elderly. MDHA will continue to engage in conversations at the local and state level for programs that incentivize the creation of affordable housing.

- *The following comment was submitted by email on April 1, 2016:*

Catholic Charities Inc. offers the following comment on Substantial Amendment 2 to the 2013-2018 Consolidated Plan for Housing and Community Development and Community Development, and the 2016-2017 Annual Update for Program Year Four (2016 Action Plan):

The proposed amendment to local ESG funding to allow for prevention assistance would greatly benefit families in Davidson County who are at imminent risk of becoming homelessness and entering the shelter system or being forced to live on the streets. In particular, the proposed amendment would enable the Catholic Charities Family Empowerment program to more effectively serve its clients who are struggling with homelessness. The Family Empowerment program has served over 116 families in two years, and has housed 70 families. Over 68% of families served since 2014 (approx. 78 families) have either a detainer warrant for an eviction, live with a friend or relative, or live in a motel. These families have had to leave stable housing due to financial hardship and are forced to stay in very unstable living situations. Currently, these families do not qualify for local ESG assistance because they are not considered “literally homeless.” With the amendment, these families would qualify for prevention assistance because they do not have adequate financial resources to maintain their current living situation, and would be considered “imminently at-risk.” ESG prevention funds would allow Catholic Charities to divert families away from the shelter system, and prevent them from becoming literally homeless, by helping them move into stable and financially sustainable housing. National housing research, along with the recent local report released from Focus Strategies, all reveal that in order for a city’s housing crisis resolution system to have maximum effectiveness, shelter diversion should target those households who are imminently going to be homeless within a few days. In summary, Catholic Charities particularly supports the portion of the proposed amendment that will allow a portion of ESG funds to be used for Prevention.

R: Thank you.

- *The following comment was submitted by email on April 24, 2016:*

Instead of a Request for Proposal make it an open application. The period to submit application would be for 6 months from the start of the fiscal year.

If there is still an RFP process have the submittal date not within weeks of the Barnes and THDA grant due dates.

R: For the HOME homebuyer and rental programs, we are considering opening the application process on July 1 and closing it on December 31 or until all funding is committed, whichever is sooner. We are attempting to align our processes with those of other funders as much as possible. If HOME funds are still available after December 31, MDHA may choose to self-develop or issue an RFP in order to meet the HOME commitment requirements.

**APPENDIX G**  
**CERTIFICATIONS**

SF 424 and Certifications will be added once the Metro Council approves the Action Plan and Mayor Barry signs all documents.

METROPOLITAN NASHVILLE-DAVIDSON COUNTY, TENNESSEE

**EXHIBITS**

**2016-2017 ANNUAL UPDATE  
TO THE  
2013-2018 CONSOLIDATED PLAN  
FOR  
HOUSING AND COMMUNITY DEVELOPMENT  
PROGRAM YEAR FOUR**

**For the period April 1, 2016 – March 31, 2017**

**Prepared by:**

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



Updated May 2, 2016

**2016-2017 Annual Update to the 2013-2018 Consolidated Plan (2016 Action Plan)**

**Program Year Four**

**EXHIBITS**

**Exhibit 1 – CPD Notice 16-01**

**Exhibit 2 – HUD Approval to Extend Submittal Deadline**

**Exhibit 3 – Notice of 2016 Allocations**

**Exhibit 4 – Geographic Priorities/Place-Based Census Tracts**

**Exhibit 5 – Determining a Census Tract Number**

**EXHIBIT 1**

**CPD NOTICE 16-01**

**GUIDANCE ON SUBMITTING CONSOLIDATED PLANS AND ANNUAL ACTION  
PLANS FOR FISCAL YEAR 2016**



**U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT**  
Community Planning and Development  
WASHINGTON, DC 20410-7000

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**Special Attention of:**

All CPD Division Directors  
HUD Field Offices  
HUD Regional Offices  
All CDBG Grantees  
All HOME Participating Jurisdictions  
All HTF Formula Grantees  
All ESG Formula Grantees  
All HOPWA Formula Grantees

**NOTICE:** CPD-16-01

Issued: January 28, 2016

Expires: September 30, 2016

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Subject: Guidance on Submitting Consolidated Plans and Annual Action Plans  
for Fiscal Year (FY) 2016

**Purpose:**

The purpose of this Notice is to instruct all CDBG, HOME, HTF, ESG and HOPWA formula grantees on the timing of submission of FY 2016 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, 2015; and the latest submission deadline is August 16, 2016. However, in most years, HUD does not receive its



annual funding appropriation until several months into the federal fiscal year (rarely earlier than December, and sometimes as late as April). Once a fiscal year's appropriation is enacted, HUD needs time to compute grantees' allocation amounts for the formula 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 2016. 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 formula 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 2016, 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 2016 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 2016 funding prior to computation of FY 2016 formula 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 2016 allocation amounts for CDBG, ESG, HOME and HOPWA formula funding. (See Section II. for a discussion of the timing of Housing Trust Fund allocations.)

The FY 2016 Omnibus appropriations bill was signed into law on December 18, 2015. The law requires HUD to announce FY 2016 allocation amounts to grantees within 60 days of enactment. Thus, grantees can expect to learn their FY 2016 formula program allocation amounts no later than mid-February. The provisions of this Notice are therefore likely to apply to grantees with program year start dates on or before June 1. At this time, HUD cannot provide estimated FY 2016 allocation amounts for grantees to use for planning purposes in developing annual action plans. HUD does not anticipate announcing HTF funding allocations to states until April, 2016 at the earliest.

**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 2016 formula 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 2016 Action Plans for Formula Funding programs: CDBG, ESG, HOME, HOPWA**

Grantees are advised not to submit their consolidated plan/action plan until after the FY 2016 formula allocations have been announced. Grantees due to submit a new 3-5 year consolidated plan in FY 2016 should refrain from submitting the overall consolidated plan as well as the FY 2016 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 2016 formula funding allocation amounts, each grantee should, prior to submission, ensure that the actual FY 2016 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, 2016 (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 2016 allocation amounts to grantees on February 15, 2016:

- For grantees with January 1 – April 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 April 15, 2016.
- For grantees with May 1 and June 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 April 15, 2016.
- Grantees with July 1 and later 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, 2016. Failure to submit an action plan for FY 2016 by August 16, 2016, will result in the automatic loss of FY 2016 CDBG funds to the grantee. This requirement is established by statute, and HUD cannot waive the August 16 submission deadline. Funding under other CPD formula programs is not subject to this deadline but, since virtually all CPD formula 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 2016 action plans. This provision does not prohibit a grantee from submitting a plan 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. Special Submission Date for the HTF Program**

The Housing Trust Fund (HTF) is a new 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.

On January 30, 2015, HUD published an interim rule implementing HTF, codified at 24 CFR Part 93. The rule requires the 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 formula allocations is different from other CPD formula 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 formula allocations is April 2016 - well after the date that formula allocations for other CPD formula programs will be announced. A state may submit its consolidated plan/action plan for the other formula grant programs before the HTF formula allocations are published and then submit its HTF allocation plan as a substantial amendment to its annual action plan, after the HTF formula 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 formula allocations. However, the state may not submit its HTF allocation plan before its HTF formula allocation has been published. HUD recommends the state use the \$3 million minimum HTF allocation as a baseline formula allocation estimate when conducting citizen participation.

### **III. HUD Review of Action Plans**

HUD will disapprove as substantially incomplete any consolidated plan or action plan covering FY 2016 funding that does not reflect actual CDBG, HOME, ESG and HOPWA allocation amounts on 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). 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 2016 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(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 2016 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 Section IV below, 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 2016 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 2016.
- 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, which 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 an alternative requirement: the effective date of a grantee's FY 2016 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 applicable 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 2016 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, 2016, as that is the last date that a grantee may submit its FY 2016 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 2016 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 2016 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, 2016, as that is the last date that a grantee may submit its FY 2016 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 2016 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 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 21<sup>st</sup> 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. However, the MAP-21 Act made several changes to HUD’s homeless programs, including the requirement that recipients follow 24 CFR Part 58. Now, recipients or other Responsible Entities assume environmental review responsibilities under 24 CFR Part 58.

#### E. Additional Provisions: HOPWA Program

A HOPWA formula grantee is permitted to incur pre-award costs against its FY 2016 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 2016 funding on or before August 16, 2016, or 60 days after HUD announcement of the FY 2016 allocation amounts for CDBG, ESG, HOME and HOPWA formula funding (whichever is earlier). HUD anticipates revising the Consolidated Plan regulations (and other related regulations) for future years 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](mailto: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

SEP 9 2015

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 2016 Action Plans  
Community Development Block Grant (CDBG) Program

HUD is issuing revised procedures to govern the submission and review of action plans for FY 2016 funding prior to the enactment of a FY 2016 appropriation bill. Any grantee with a program year start date prior to, or up to 60 days after, HUD's announcement of the FY 2016 formula program funding allocations is advised not to submit its consolidated plan or action plan until the FY 2016 formula allocations have been announced. However, an action plan must be submitted to HUD no later than August 16, 2016.

The likelihood of delays in the receipt of annual appropriations by HUD and implementation of this policy for FY 2016 may have negative consequences for CDBG grantees that intend to incur eligible costs prior to the award of FY 2016 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 nonentitlement 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 is *earlier*.

This waiver will apply to any Entitlement, Insular or Hawaii nonentitlement CDBG grantee whose program year start date for FY 2016 funding occurs during the period starting October 1, 2015, and ending August 16, 2016 or 60 days after HUD announcement of FY 2016 allocation amounts for formula program funding (whichever comes first). This 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 2016 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, 2016.

[www.hud.gov](http://www.hud.gov)

[espanol@hud.gov](mailto:espanol@hud.gov)

ATTACHMENT B



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

OFFICE OF THE ASSISTANT SECRETARY FOR  
COMMUNITY PLANNING AND DEVELOPMENT

JAN 6 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 *Harriet Tregoning*

SUBJECT: Waiver of 24 CFR 92.212(b) regarding FY 2016 Action Plans  
HOME Investment Partnership Program (HOME) Program

HUD is issuing revised procedures to govern the submission and review of action plans for FY 2016 funding prior to the enactment of an FY 2016 appropriations bill. Any participating jurisdiction with a program year start date prior to, or up to 60 days after, HUD's announcement of the FY 2016 formula program funding allocations is advised not to submit its consolidated plan or action plan until the FY 2016 formula allocations have been announced. However, an action plan must be submitted to HUD no later than August 16, 2016.

The likelihood of delays in the receipt of annual appropriations by HUD and implementation of this policy for FY 2016 may have negative consequences for HOME participating jurisdictions that intend to incur eligible costs prior to the award of FY 2016 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 the planning and administrative costs of 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 is earlier.

This waiver will apply to any HOME participating jurisdiction whose program year start date for FY 2016 funding occurs during the period starting October 1, 2015, and ending on the earlier of 60 days after HUD announcement of FY 2016 allocation amounts for formula program funding or August 16, 2016. This waiver is applicable to any HOME participating jurisdiction whose action plan submission is delayed past the normal submission date because of delayed enactment of FY 2016 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, 2016.

[www.hud.gov](http://www.hud.gov)

[espanol.hud.gov](http://espanol.hud.gov)

**EXHIBIT 2**

**HUD NOTIFICATION OF APPROVAL TO EXTEND SUBMITTAL DEADLINE OF THE  
2016 CONSOLIDATED ANNUAL ACTION PLAN**



**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

February 26, 2016

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

Dear Mr. Harbison:

**SUBJECT: Notification of Approval to Extend Submittal Deadline of the 2016 Consolidated Annual Action Plan**

This letter is in response to the February 25, 2016, letter regarding the above subject matter. It is understood that the Metropolitan Development and Housing Agency (MDHA), as the lead agency of Nashville-Davidson County programs, wanted to provide the public with real budget numbers rather than estimates. To achieve this, MDHA elected to release the Plan for public comment after it was notified of the 2016 allocations. Staff is now updating the Plan with these numbers, and the public comment period will run from March 21 - April 22, 2016. Three public hearings will occur during the comment period.

According to your request letter, the Plan must be approved first by the MDHA Board of Commissioners, then by the Metropolitan Council. The MDHA Board meets the second Tuesday of every month, and the Metro Council meets the first and third Tuesdays of every month. Since the Plan will be open for public comment in March, the soonest the Plan can be presented at a regularly-scheduled MDHA Board meeting is May 10, 2016. Following MDHA Board approval, the Plan will be presented to Metro Council for approval on May 17, 2016. After Metro Council approval, the Mayor will sign the documents and the Plan will be submitted to HUD for approval no later than May 31, 2016.

For these reasons mentioned above, this Office has approved your request to extend the deadline to submit Nashville-Davidson County's 2016 Consolidated Annual Action Plan from February 15, 2016, to May 31, 2016. If you have any questions, please contact Lynn Holt, Senior Community Planning and Development Representative, at (865) 474-8222.

Very sincerely yours,

A handwritten signature in blue ink that reads "Mary C. Wilson".

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 2016 ALLOCATIONS



The Fiscal Year (FY) 2016 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-FY16 ALLOCATIONS							
KEY	CNSRTKEY	NAME	STA	CDBG16	HOME16	HOPWA16	ESG16
471368		Nashville-Davidson	TN	\$4,559,221	\$1,819,757	\$942,082	\$416,420



## 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

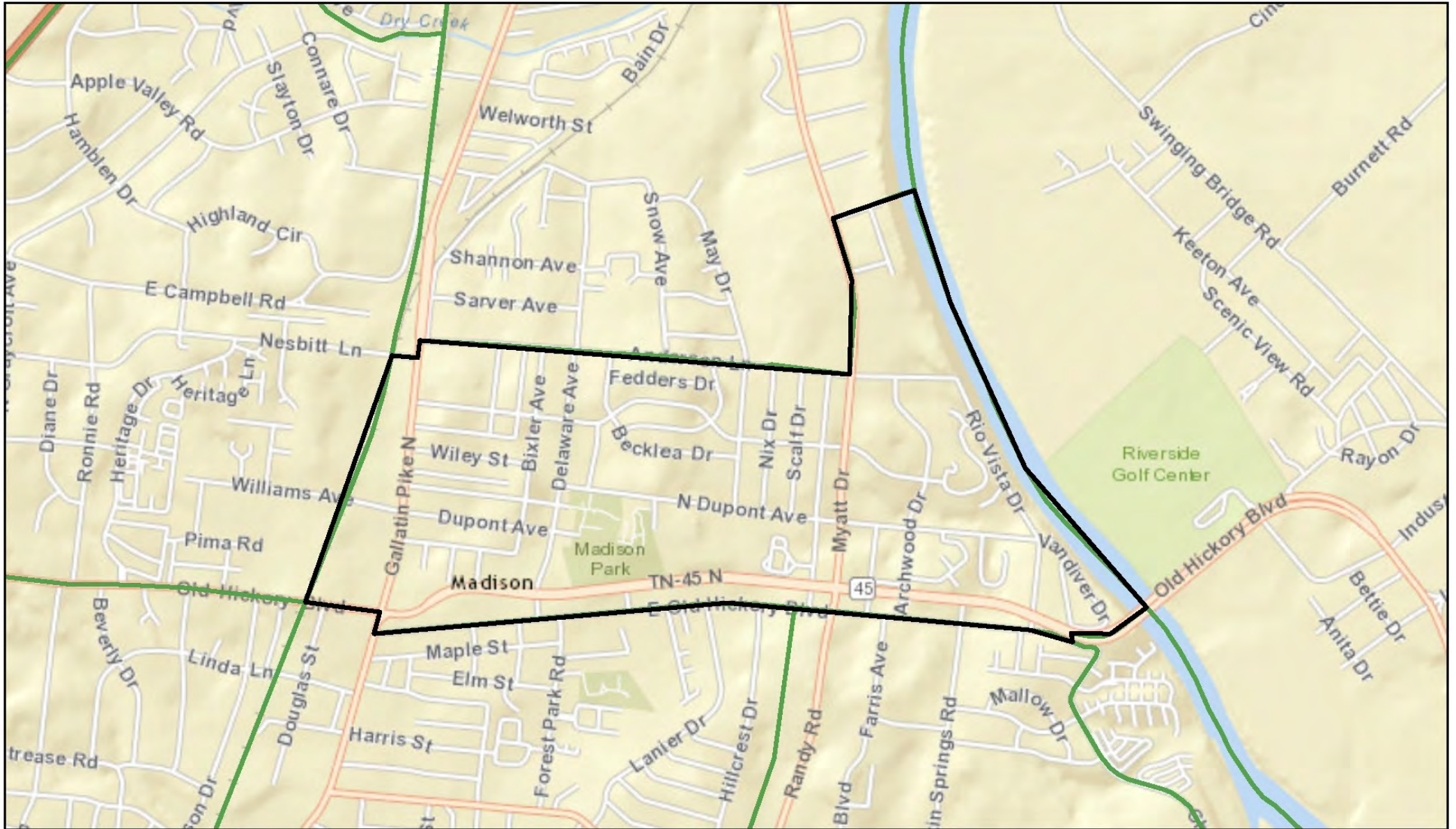
013601	013602	013700	013800	013900	014200	014300	019400
--------	--------	--------	--------	--------	--------	--------	--------

- 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.

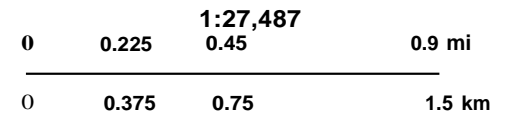
# CPO Maps - Census Tract 010402



April 9, 2015

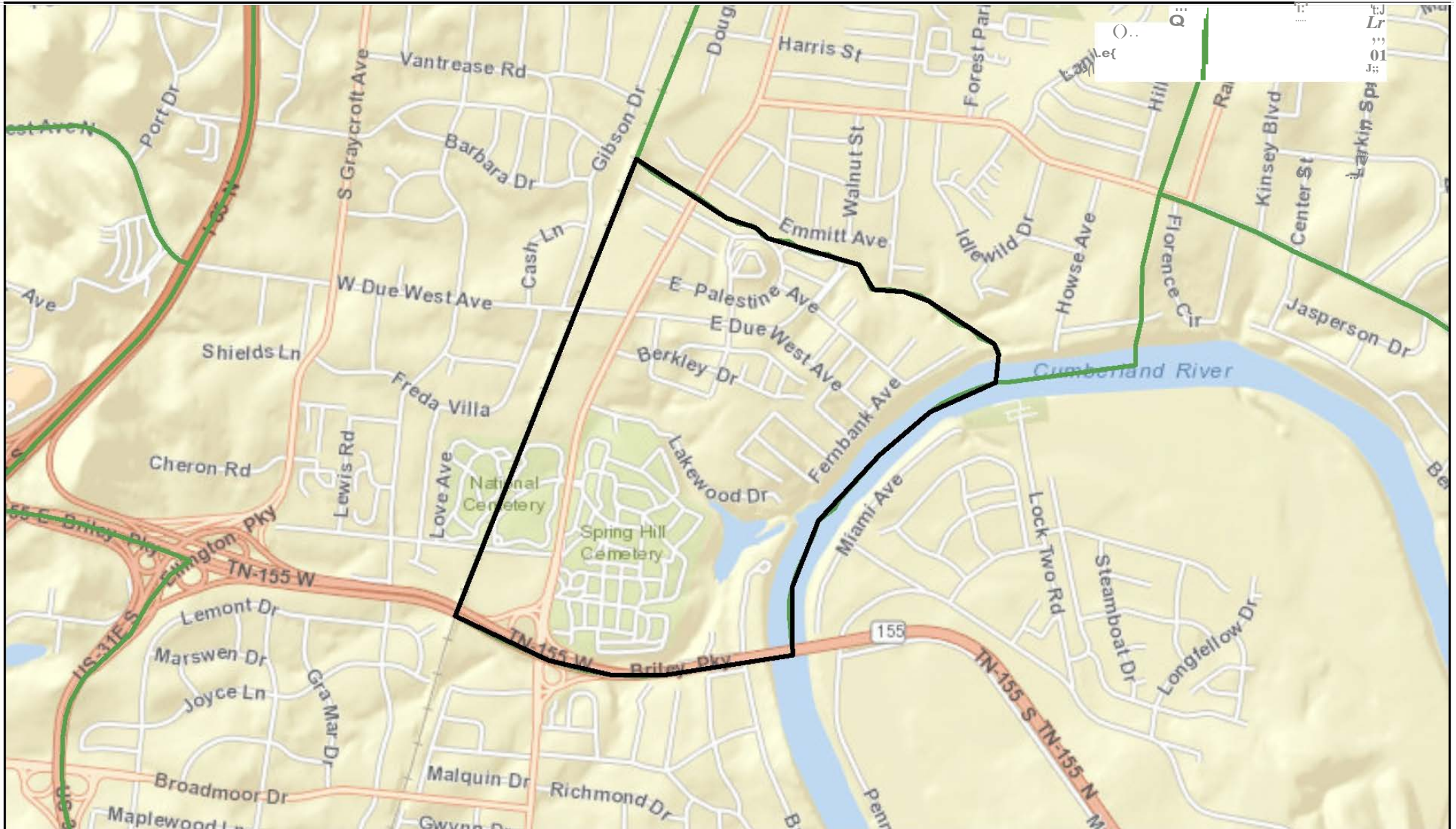
Override 1

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

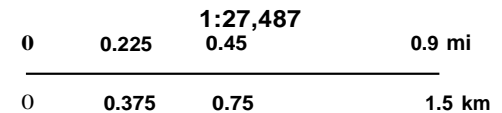
# CPO Maps - Census Tract 010702



April 6, 2015

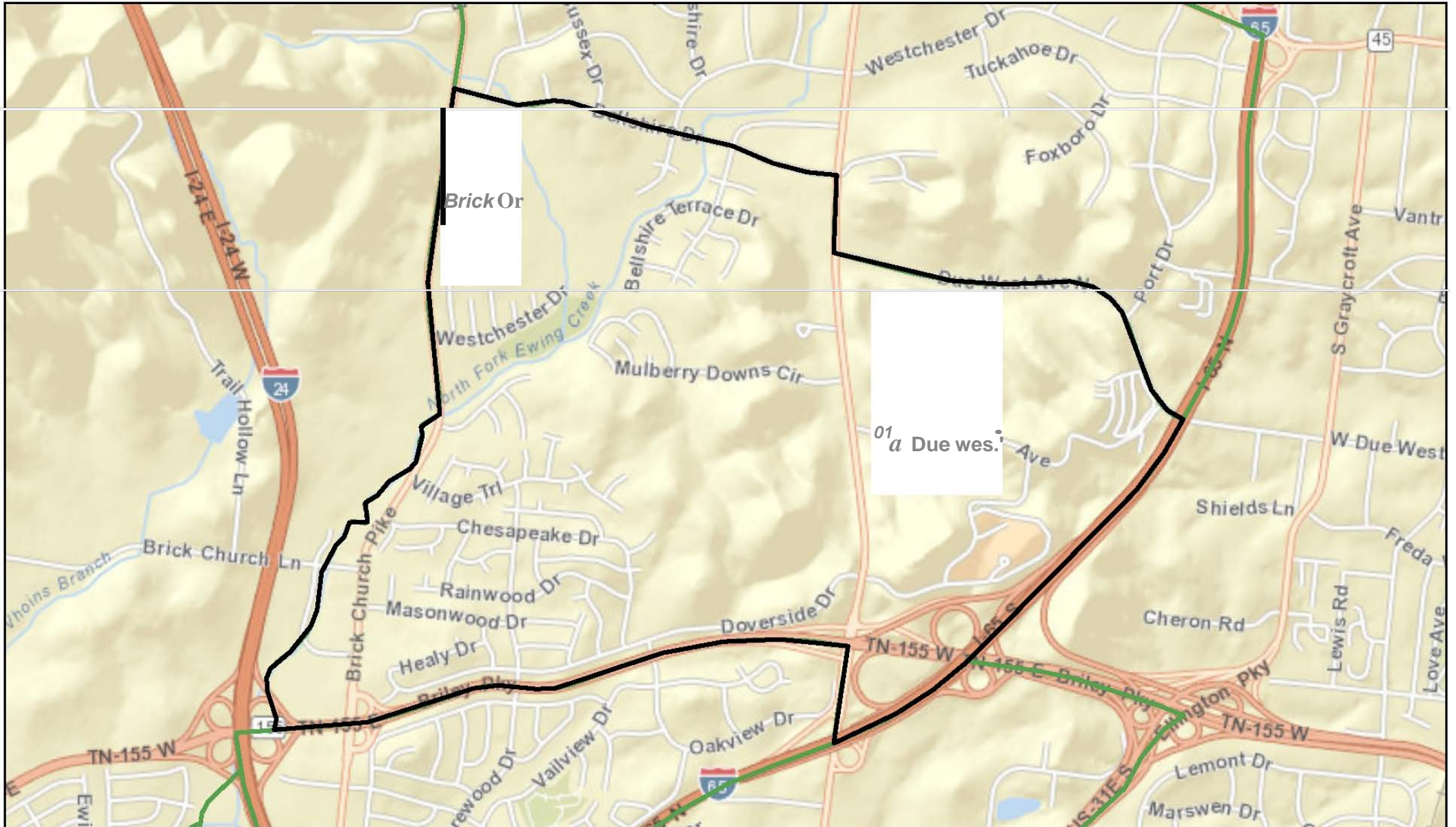
Override 1

Low Mod Tract



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

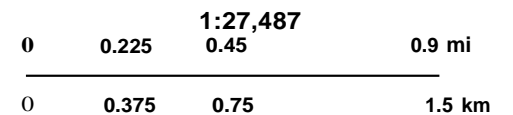
# CPO Maps - Census Tract 010903



April 6, 2015

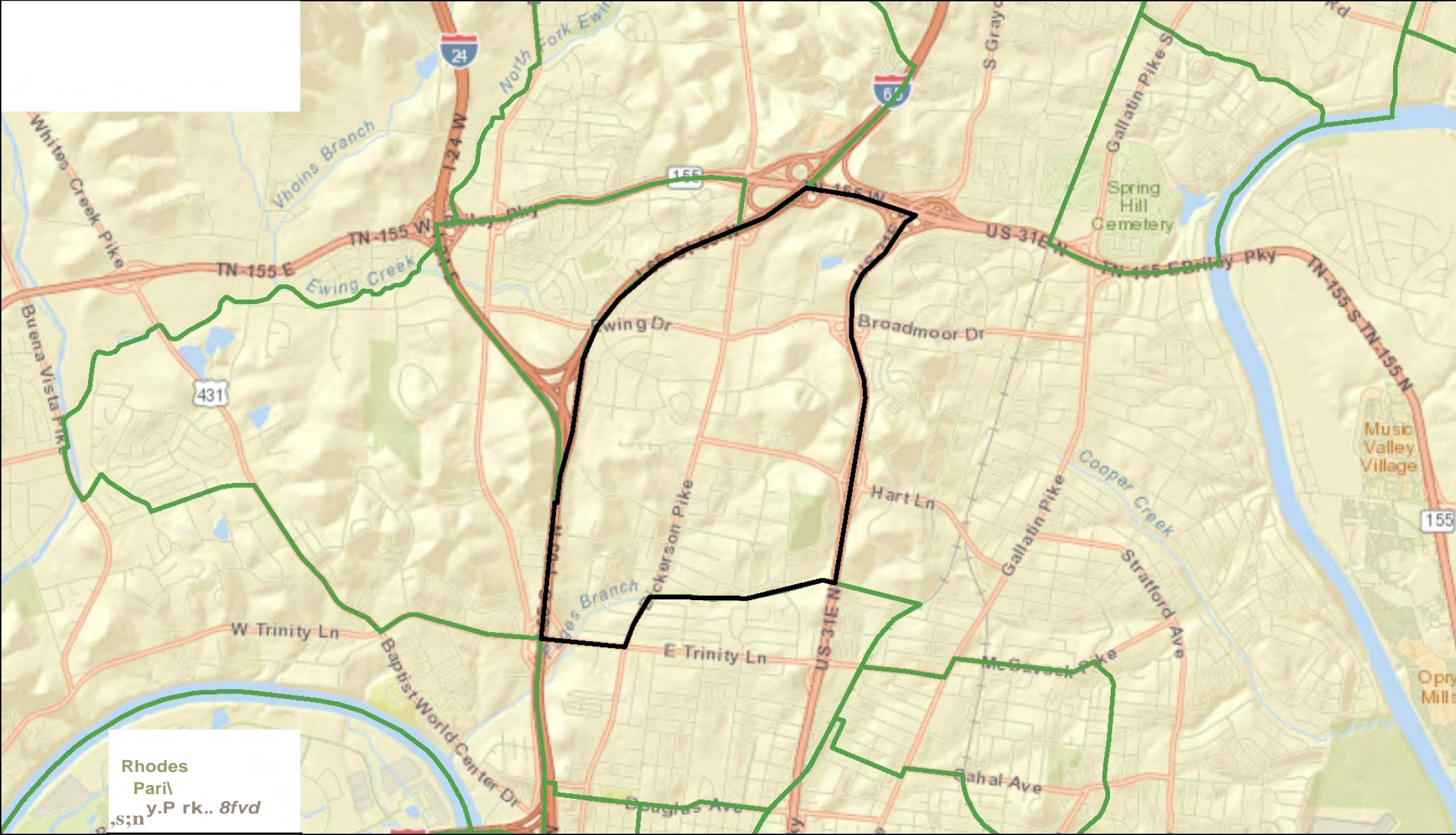
Override 1

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

# CPO Maps- Census Tract 011001

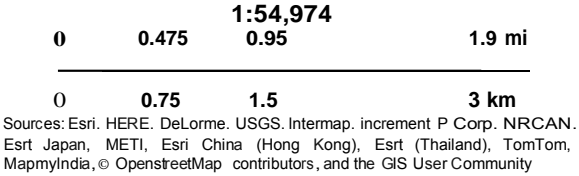


Rhodes  
Parl  
y.P rk.. 8fvd

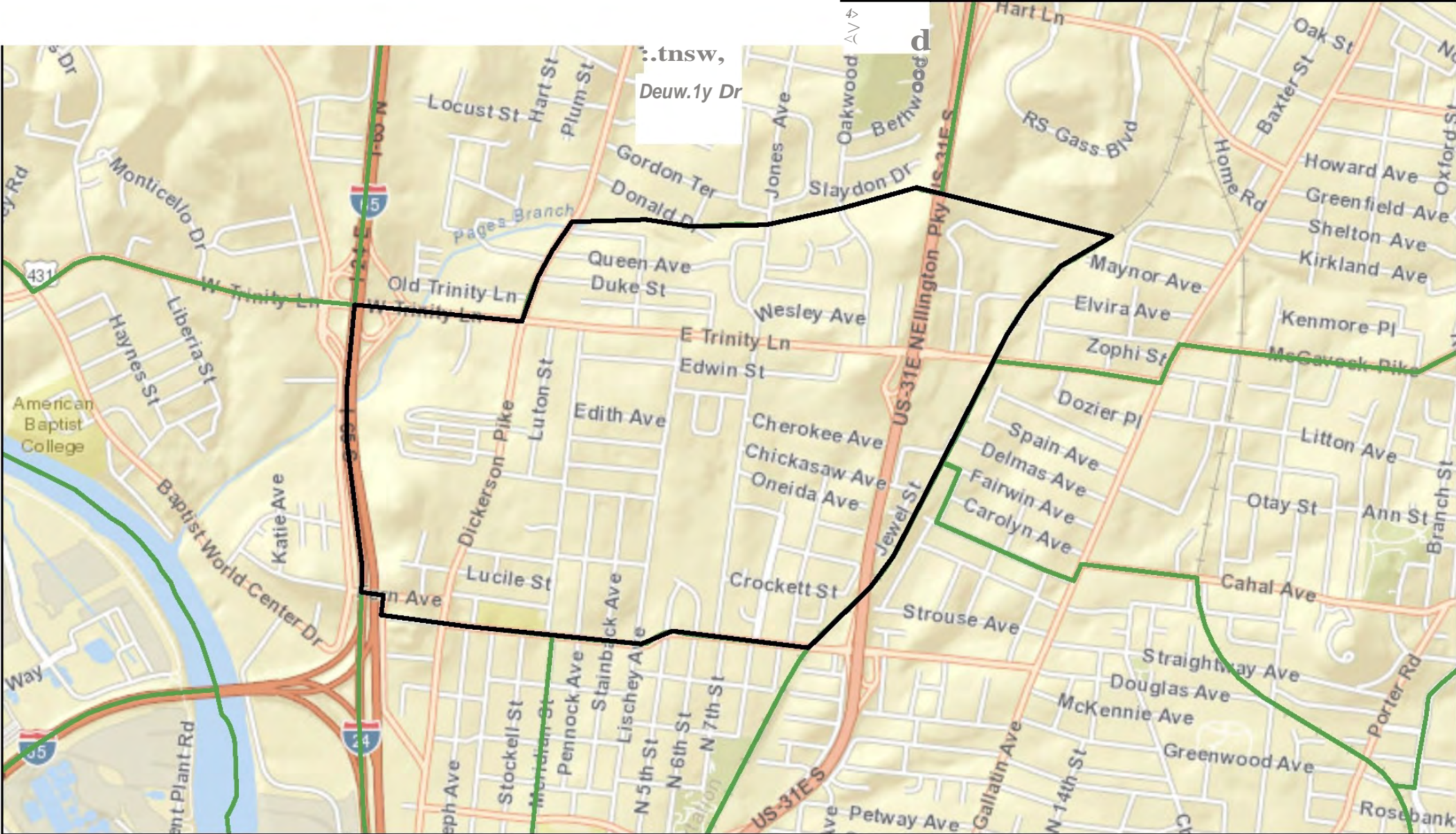
April 6, 2015

Override 1

Low Mod Tract



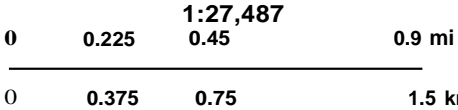
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April 6, 2015

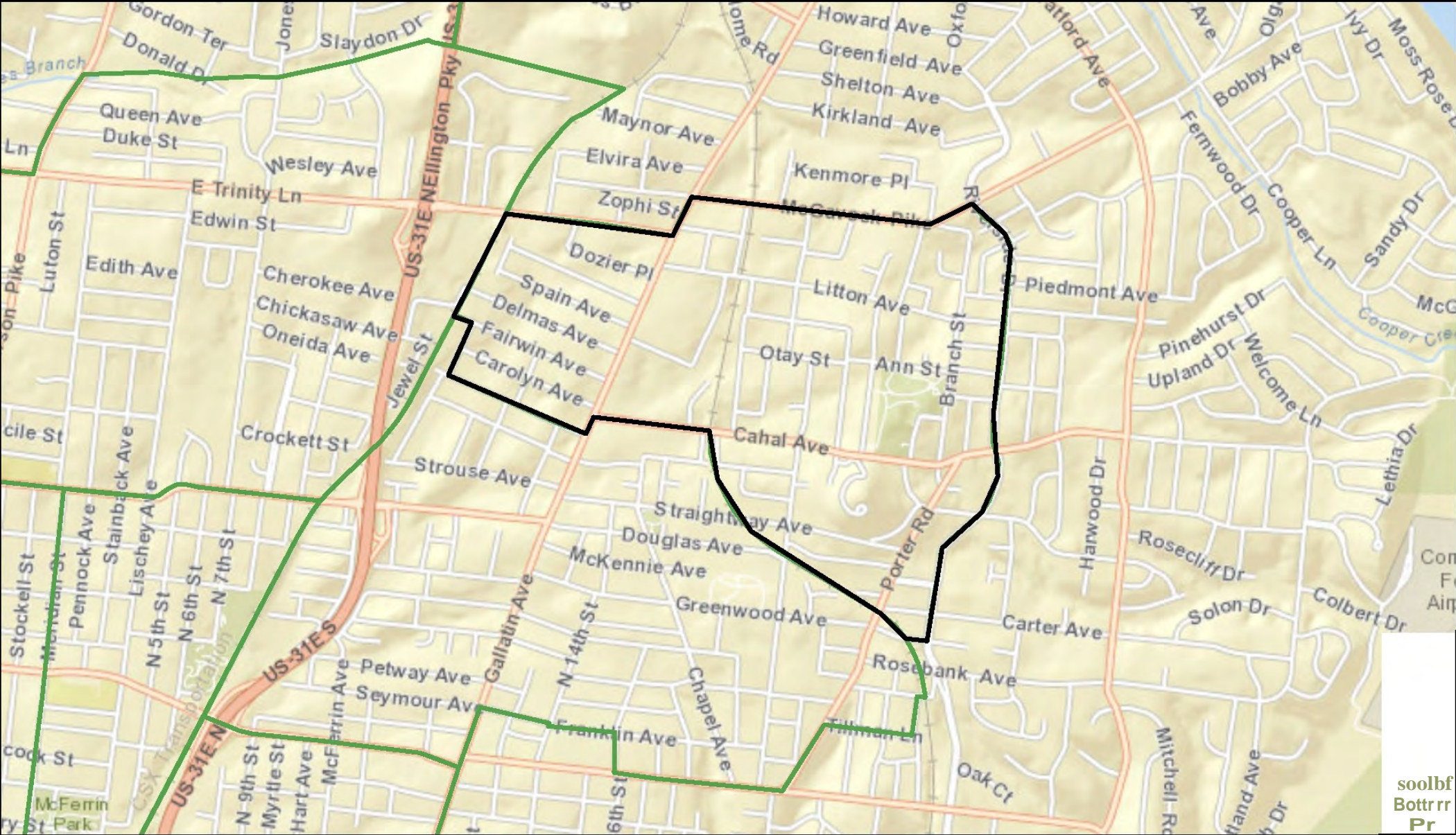
Override 1

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

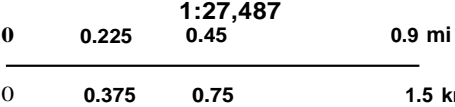
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April 6, 2015

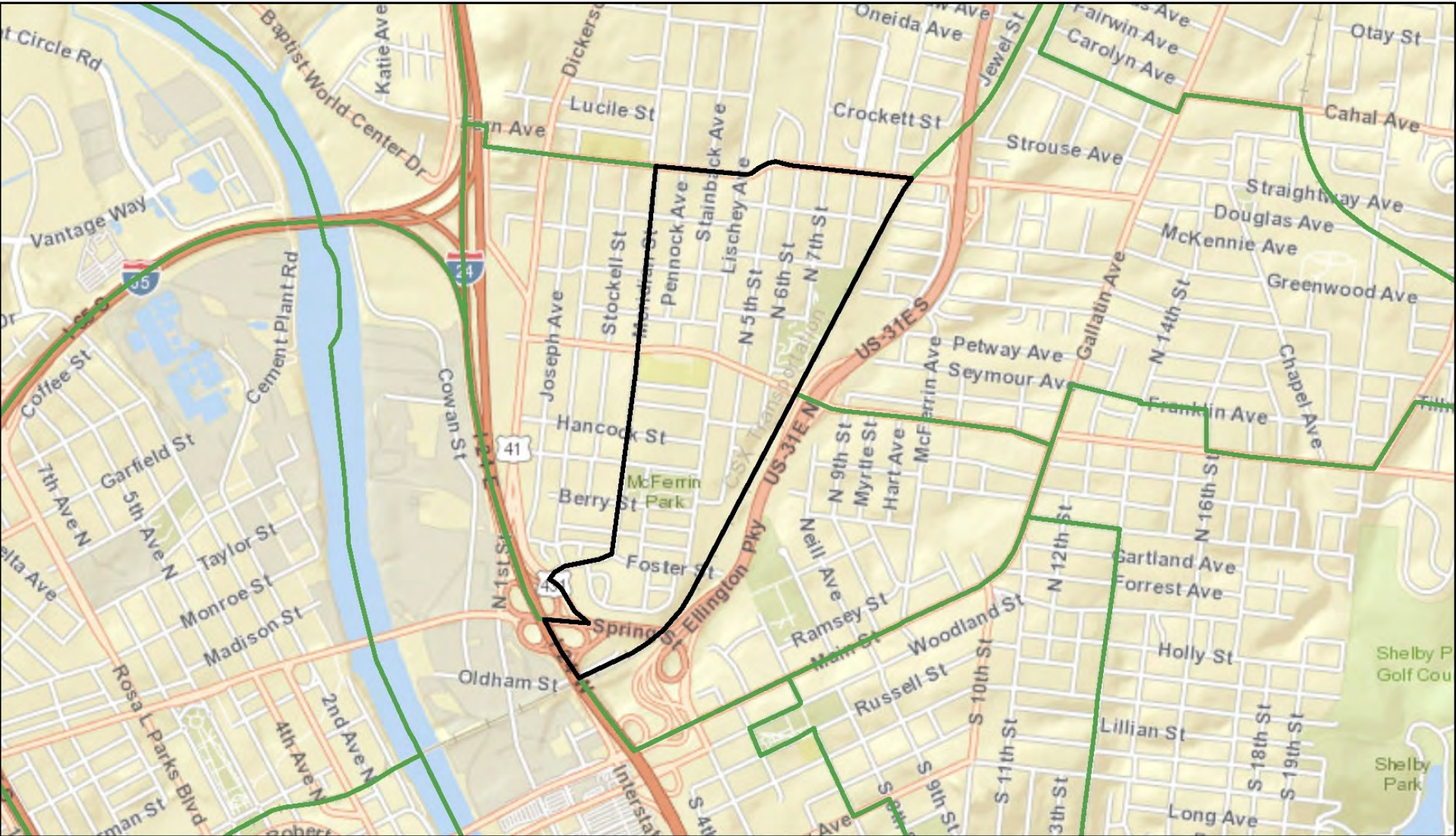
Override 1

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

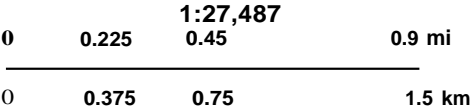
# CPO Maps- Census Tract 011800



April 6, 2015

Override 1

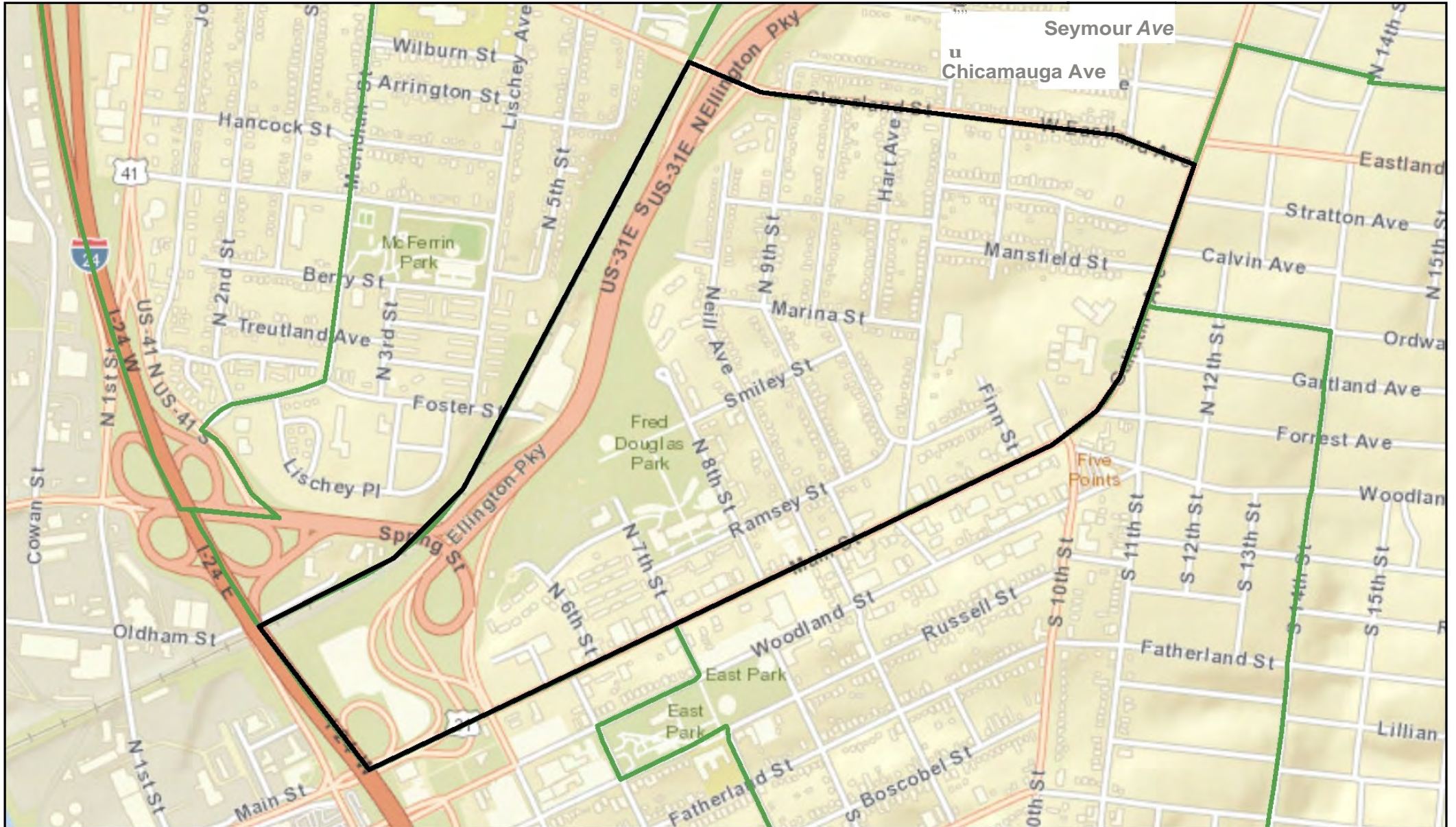
Low Mod Tract



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

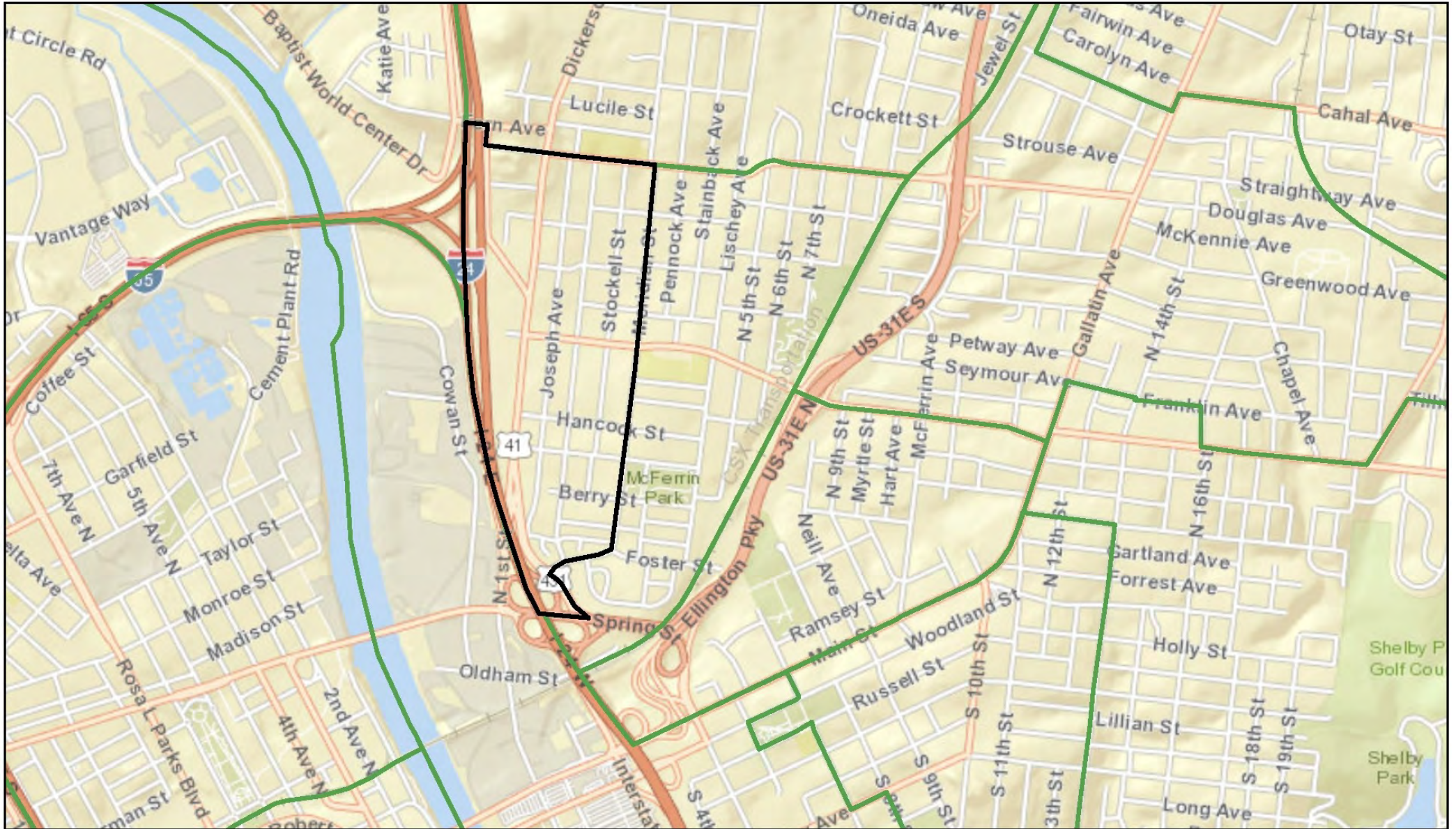
Low Mod Tract

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

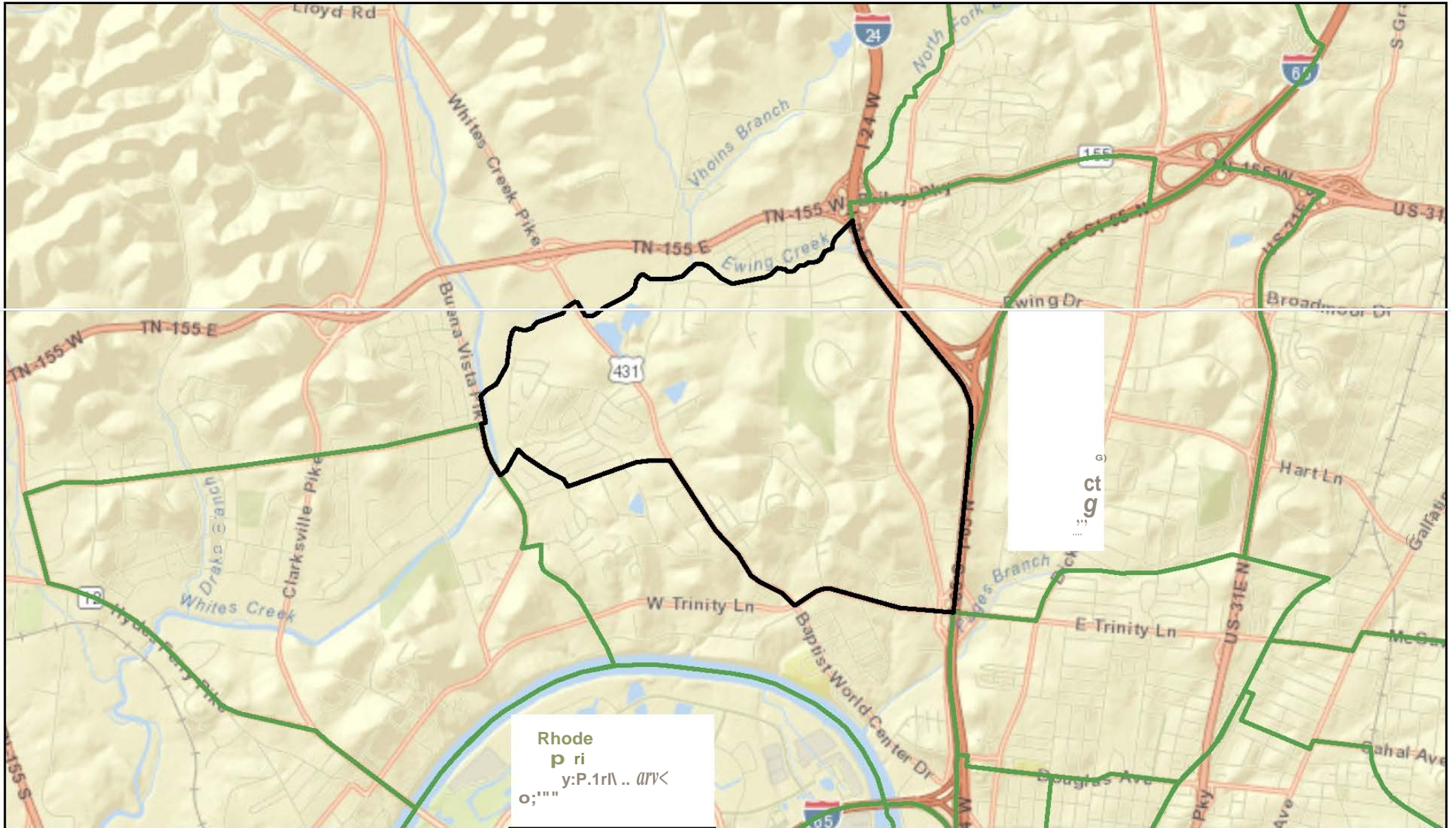
Low Mod Tract

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 012701



April 6, 2015

Override 1

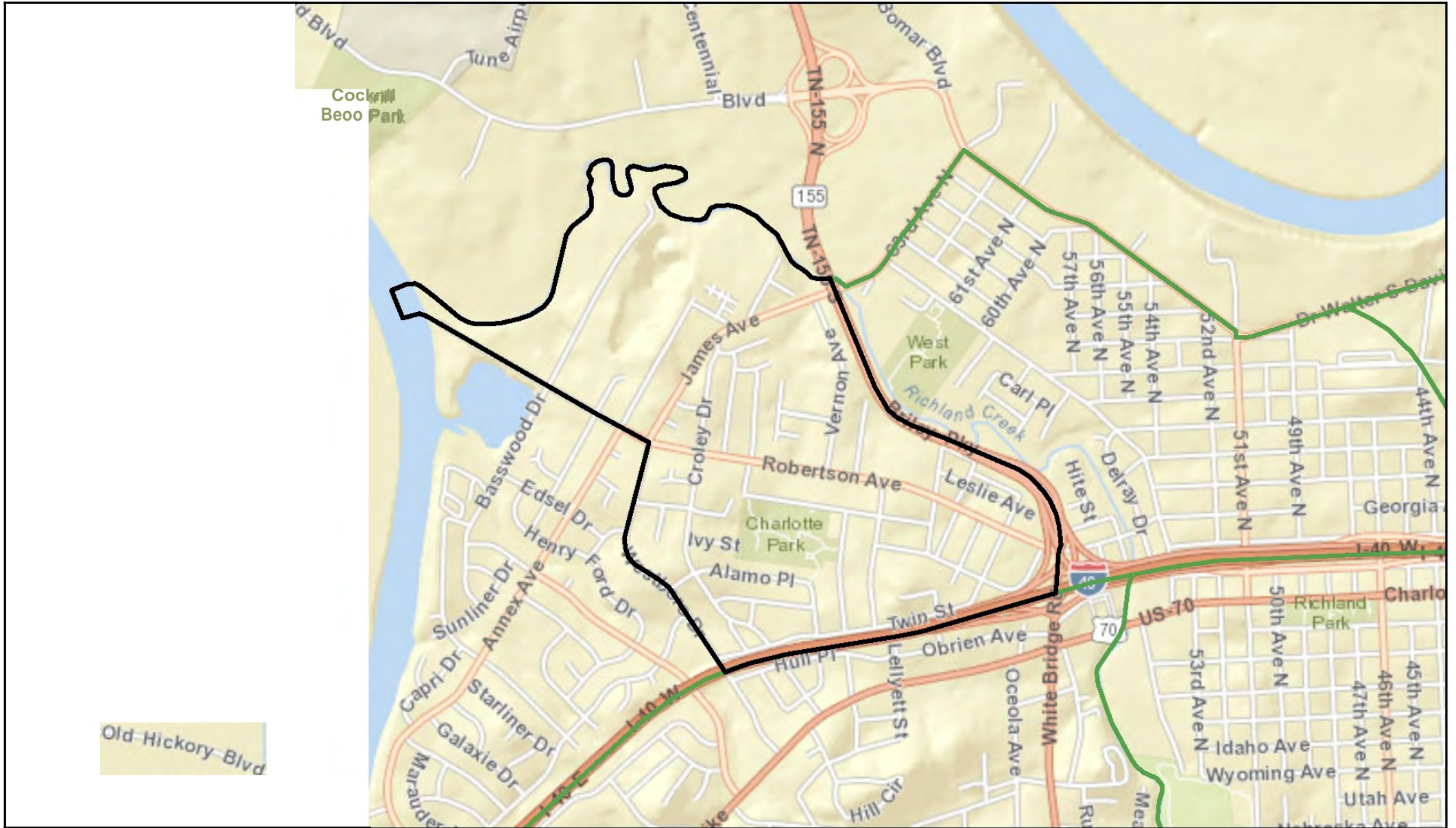
Low Mod Tract

0 0.475 1:54,974 0.95 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, MapmyIndia, © OpenstreetMap contributors, and the GIS User Community

# CPO Maps - Census Tract 013202



April 6, 2015

Override 1

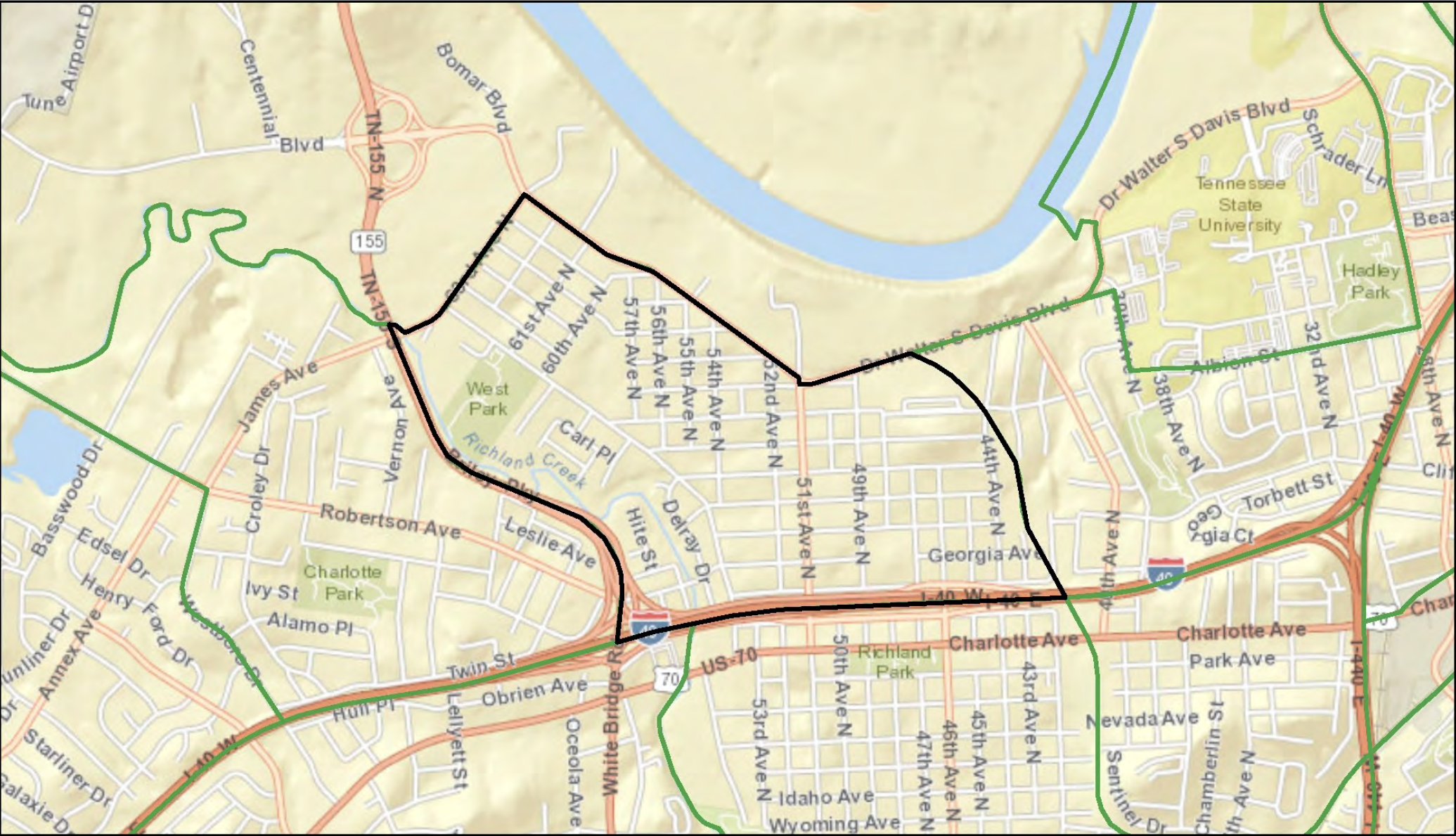
Low Mod Tract

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, Esrt Japan, METI, Esri China (Hong Kong), Esrt (Thailand), TomTom, MapmyIndia, © OpenstreetMap contributors, and the GIS User Community

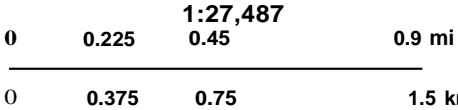
# CPO Maps - Census Tract 013300



April 6, 2015

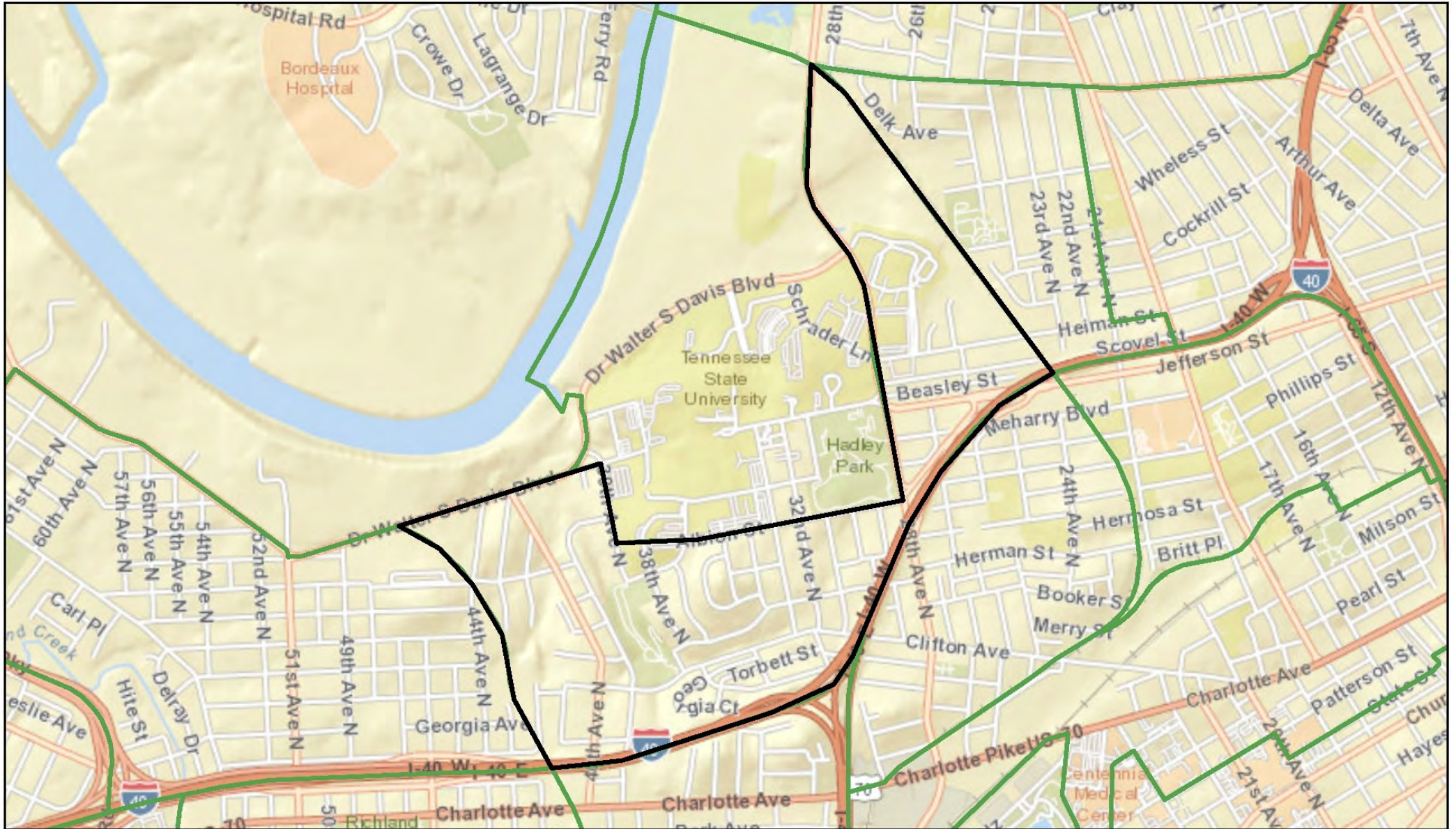
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Low Mod Tract



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

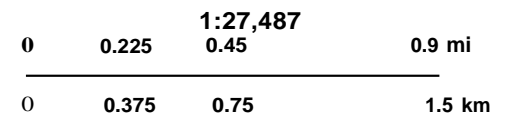
# CPO Maps- Census Tract 013601



April 6, 2015

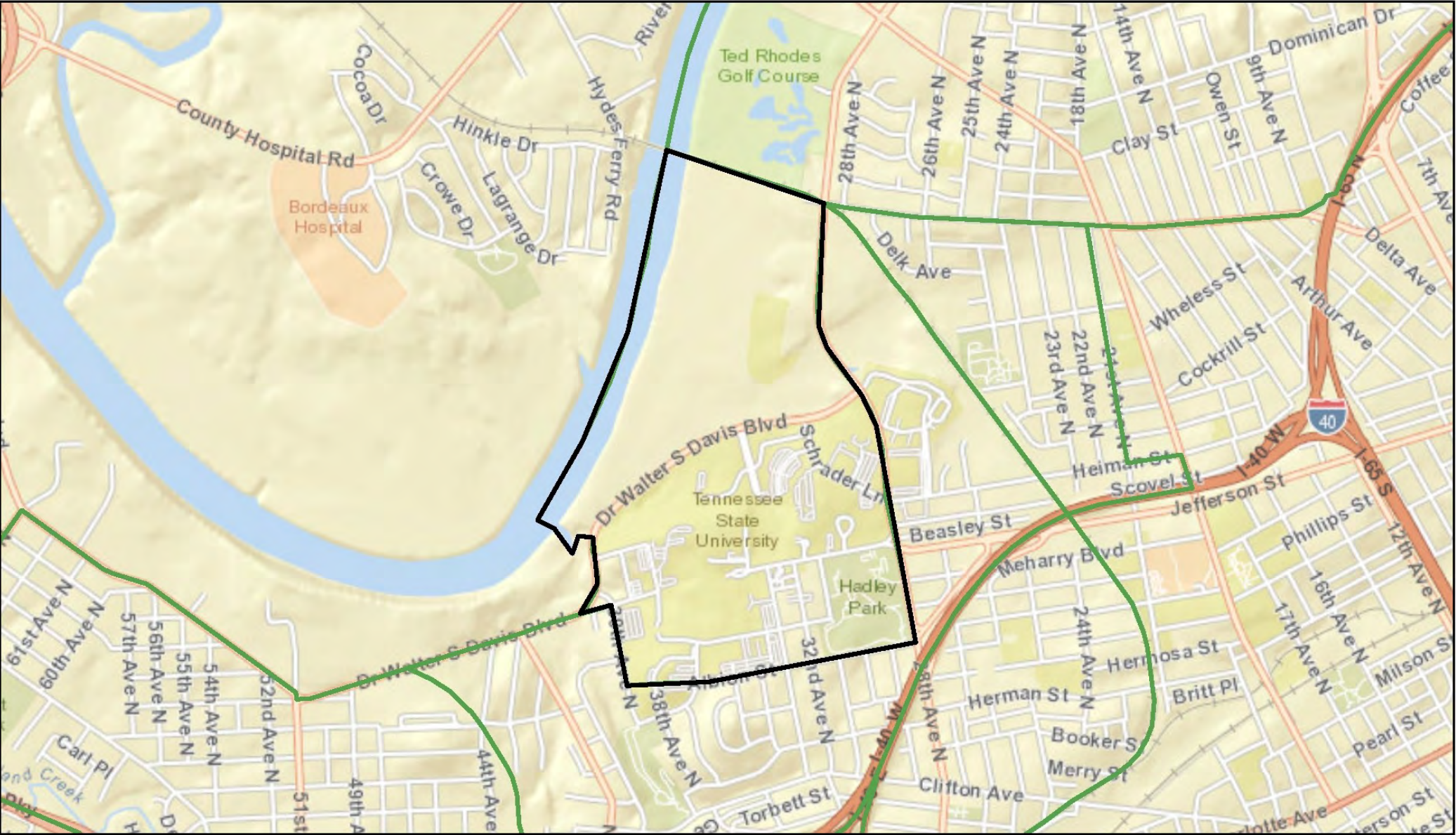
Override 1

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

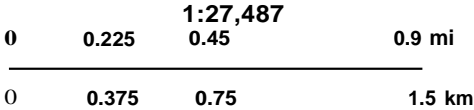
# CPO Maps - Census Tract 013602



April 6, 2015

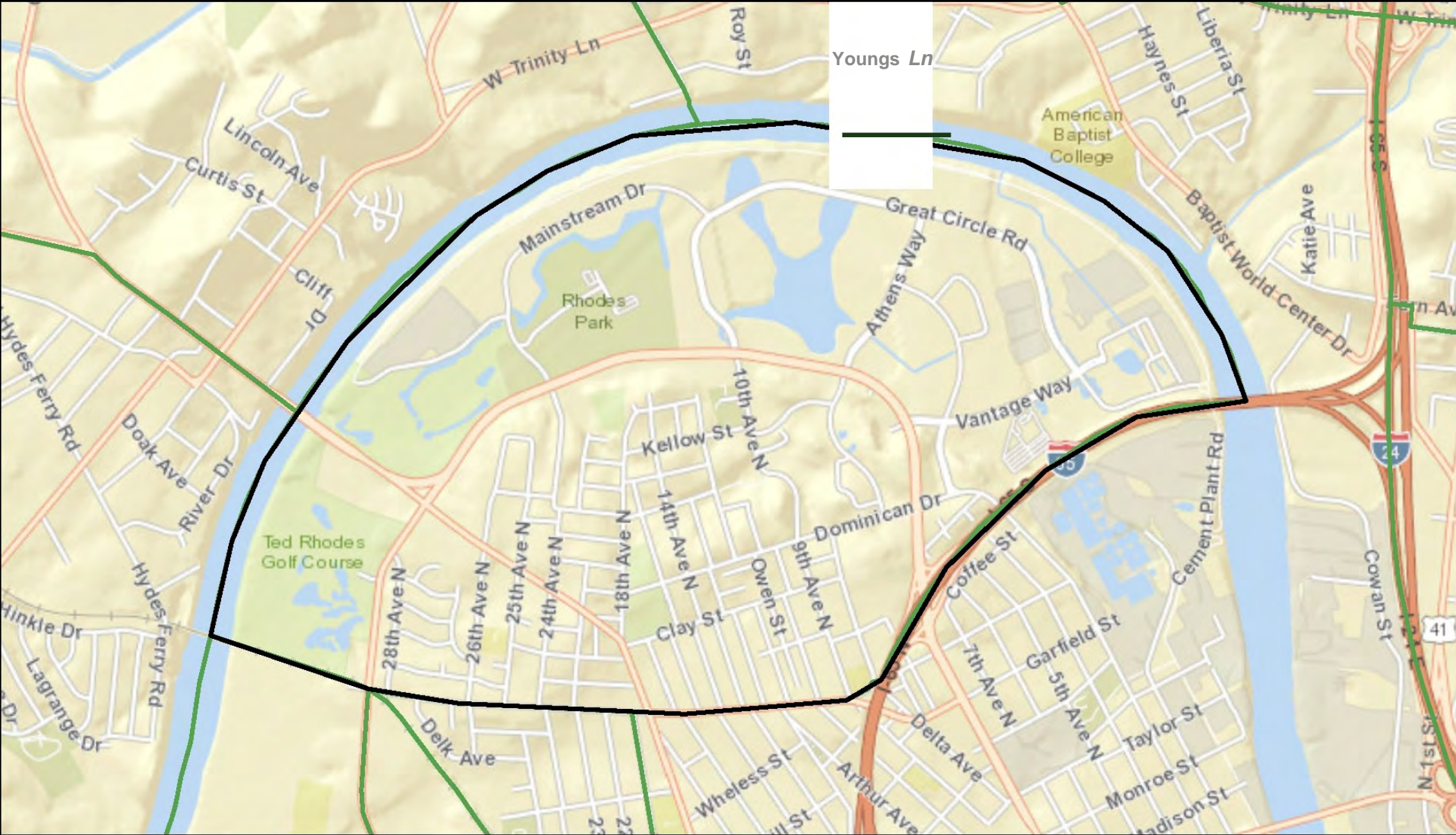
Override 1

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

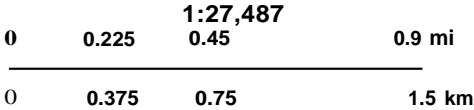
# CPO Maps - Census Tract 013700



April 6, 2015

Override 1

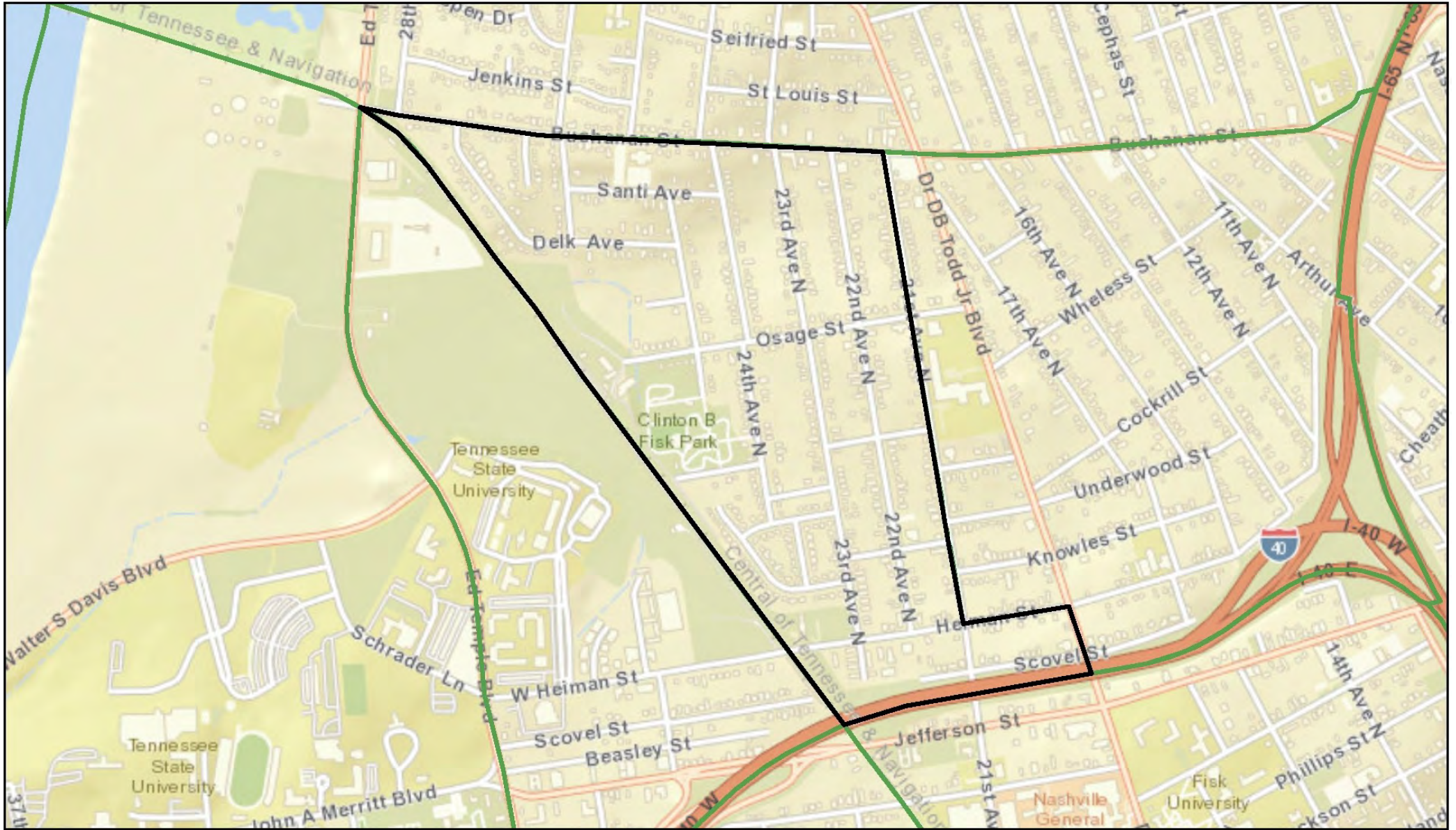
Low Mod Tract



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 013800



April 6, 2015

Override 1

Low Mod Tract

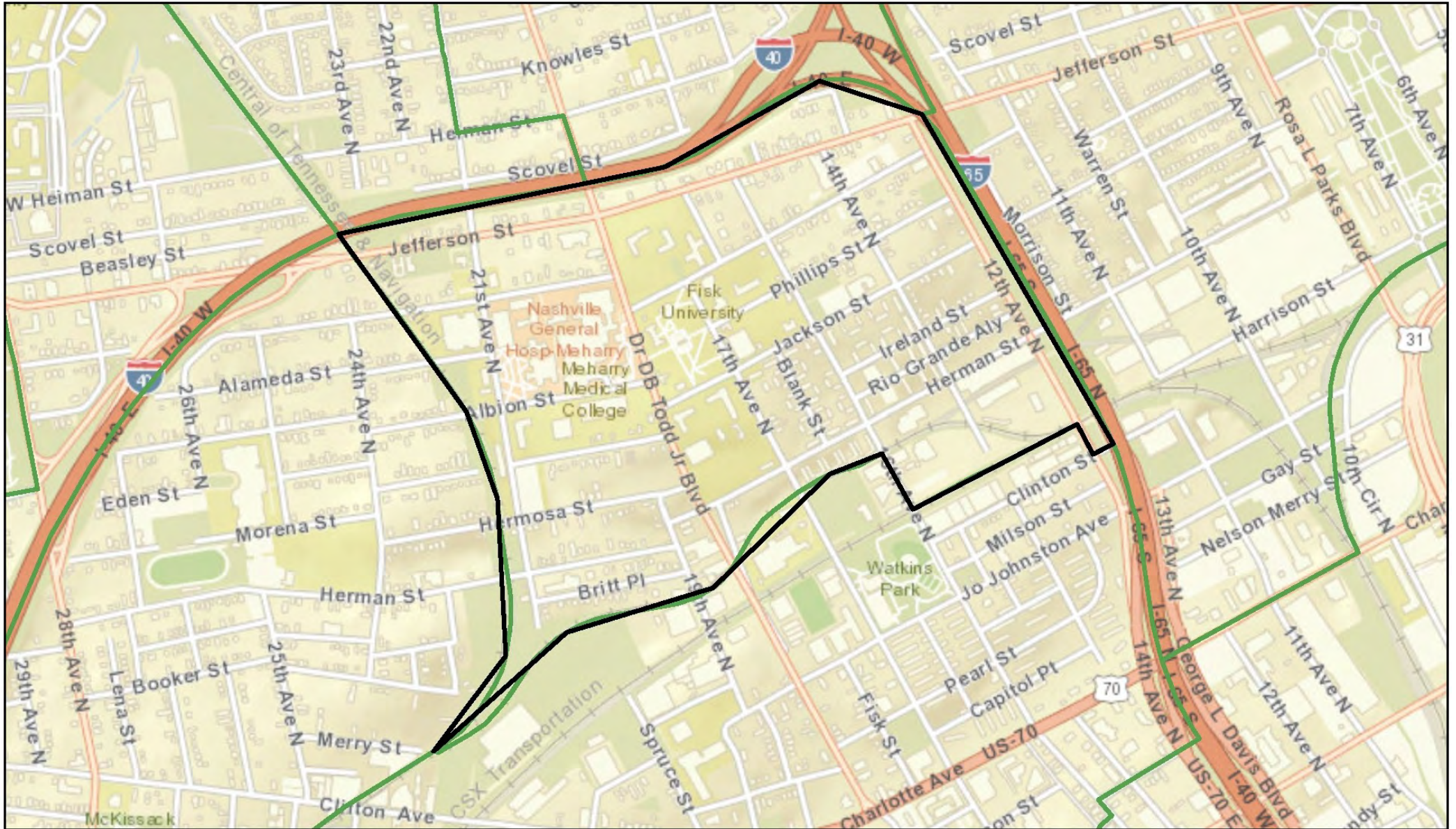
0 0.1 0.2 0.4 mi

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 014200



April 6, 2015

Override 1

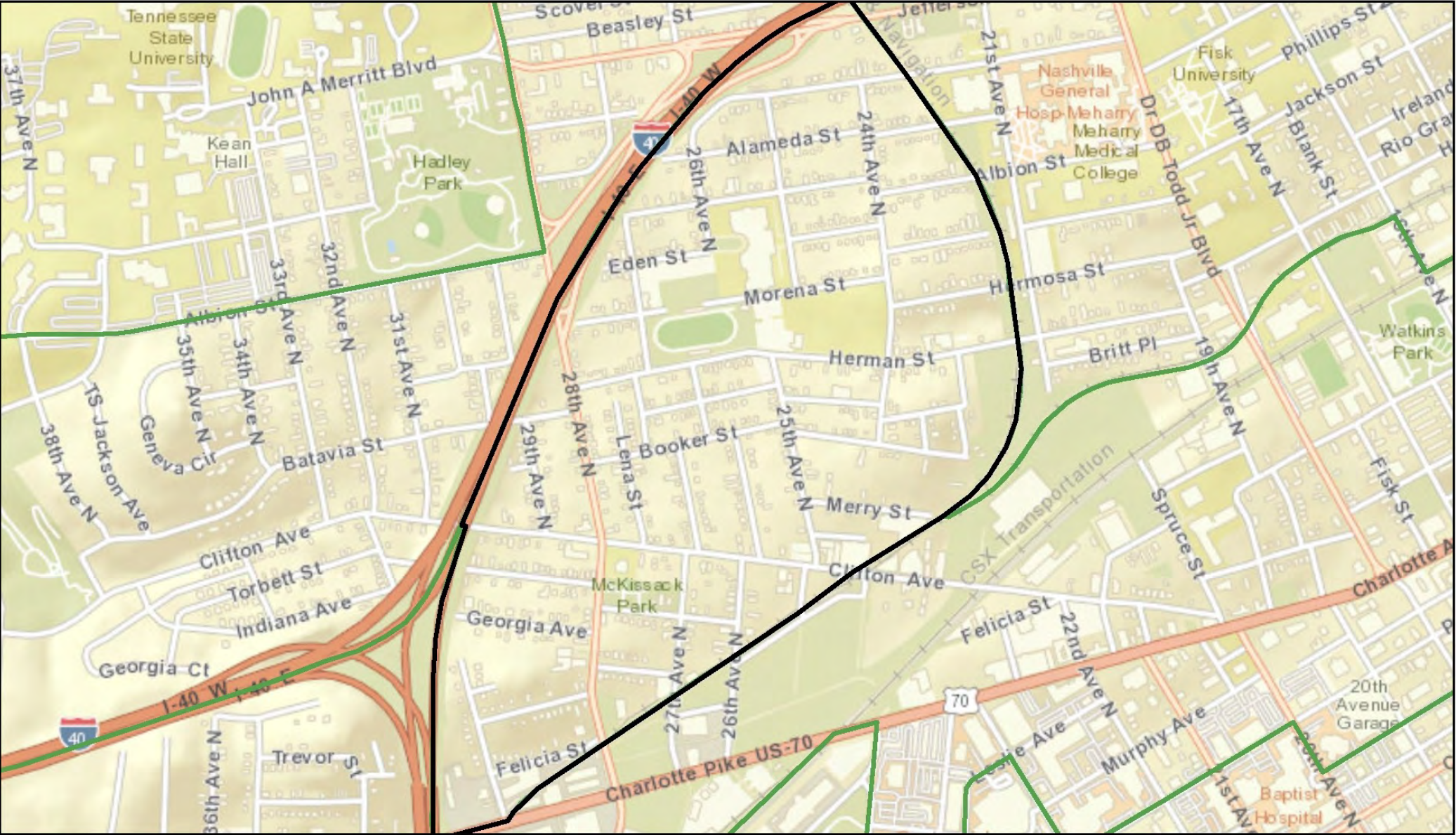
Low Mod Tract

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

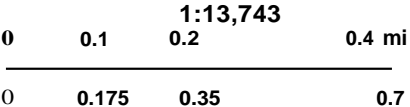
# CPO Maps- Census Tract 014300



April 6, 2015

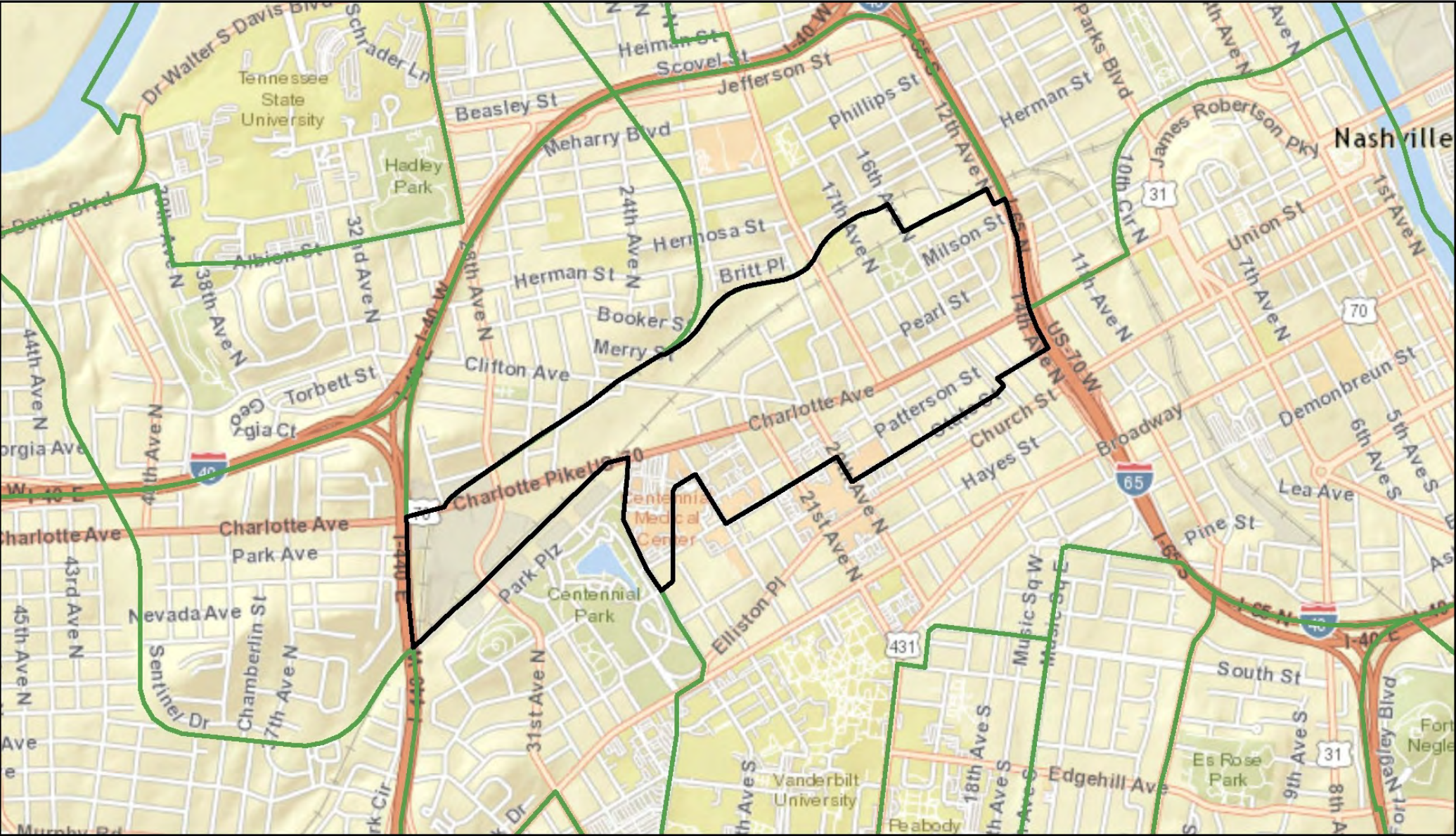
Override 1

Low Mod Tract



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

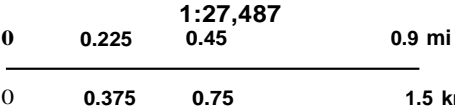
# CPO Maps- Census Tract 014400



April 6, 2015

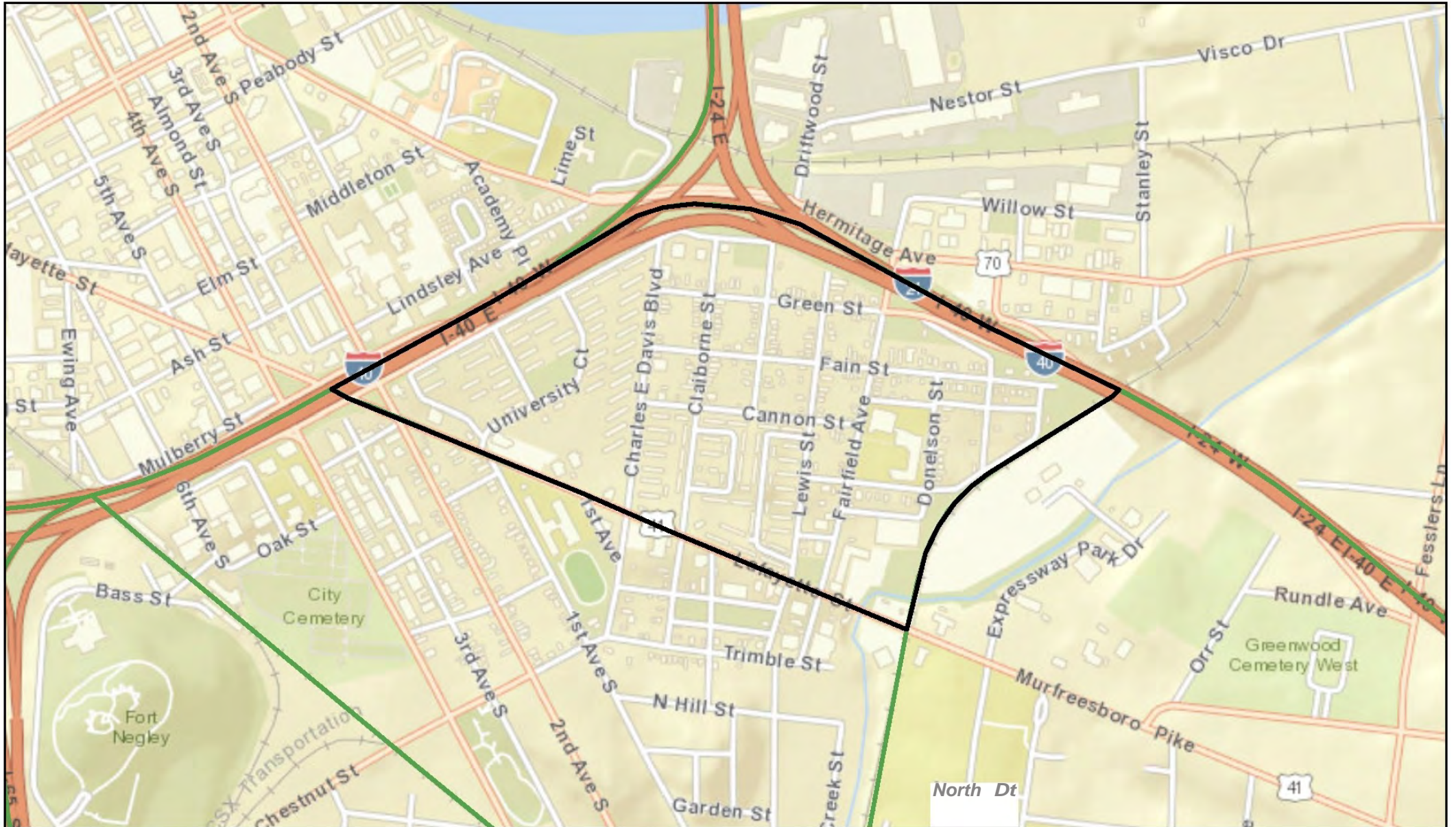
Override 1

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

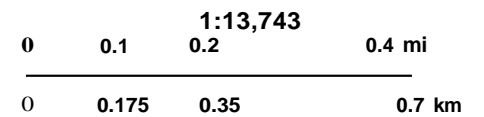
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April 6, 2015

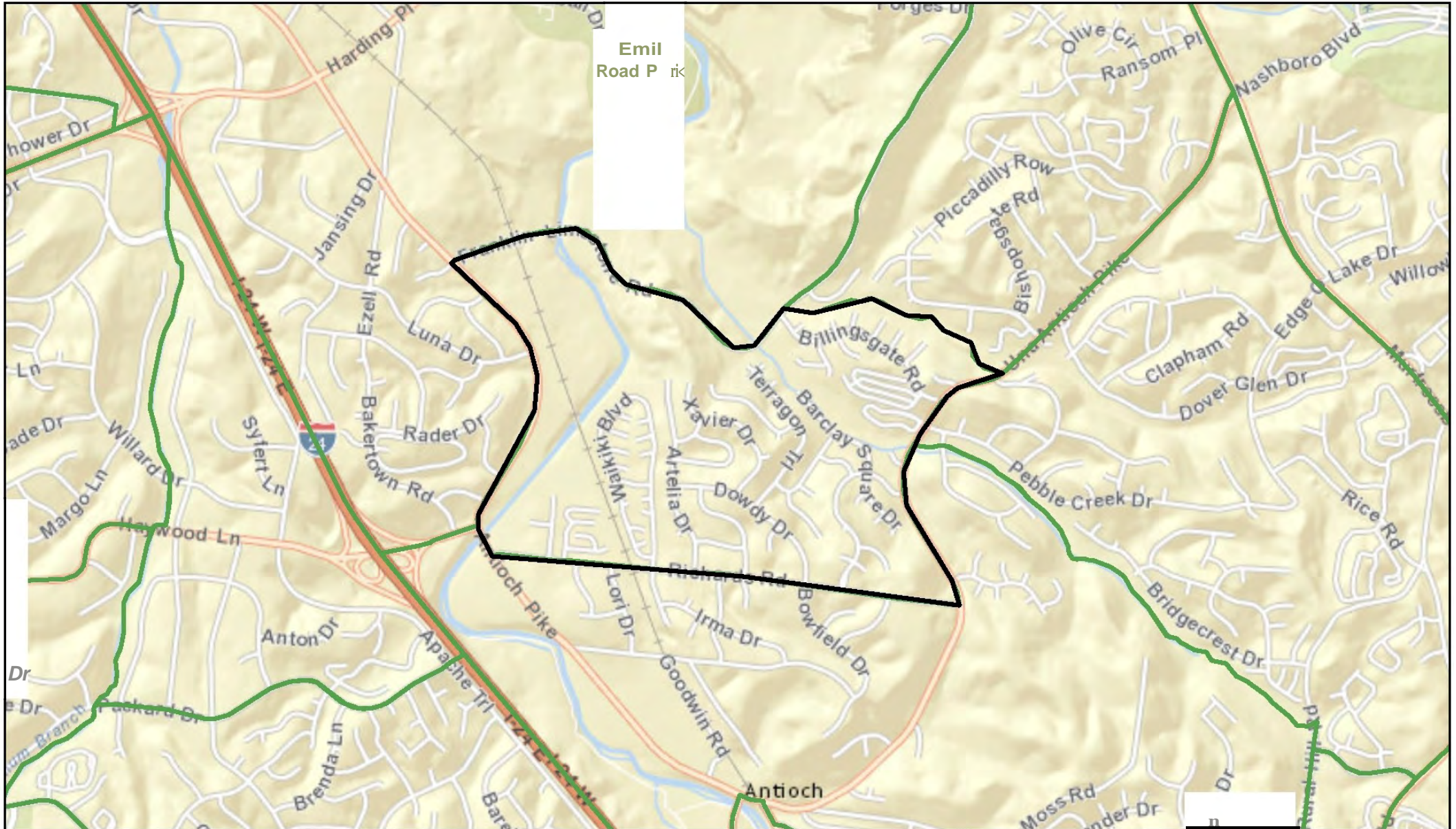
Override 1

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

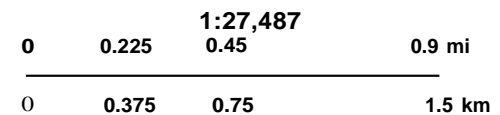
# CPO Maps- Census Tract 015615



April 6, 2015

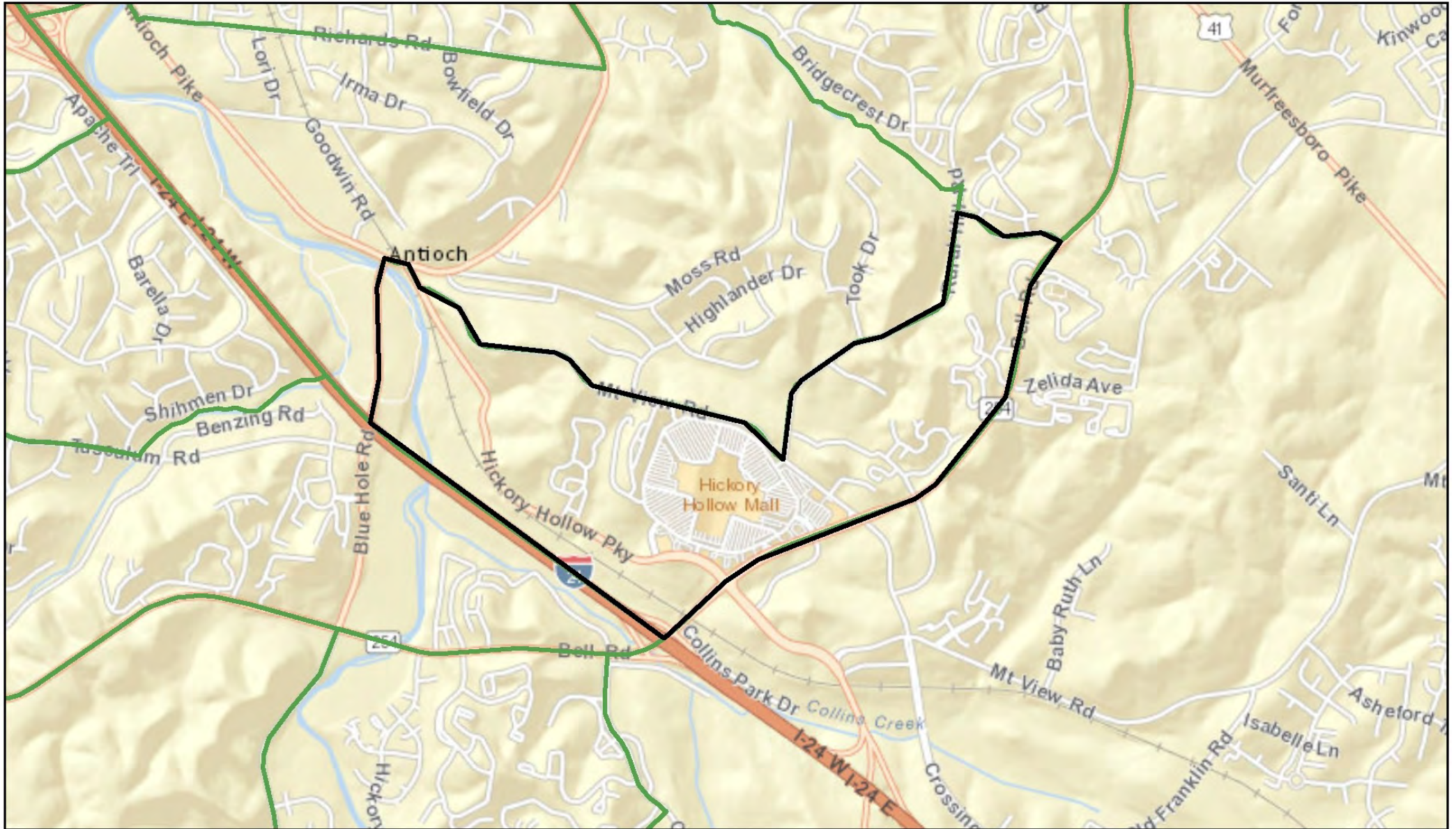
Override 1

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

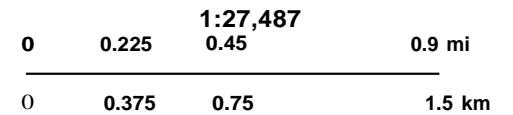
# CPO Maps - Census Tract 015628



April 6, 2015

Override 1

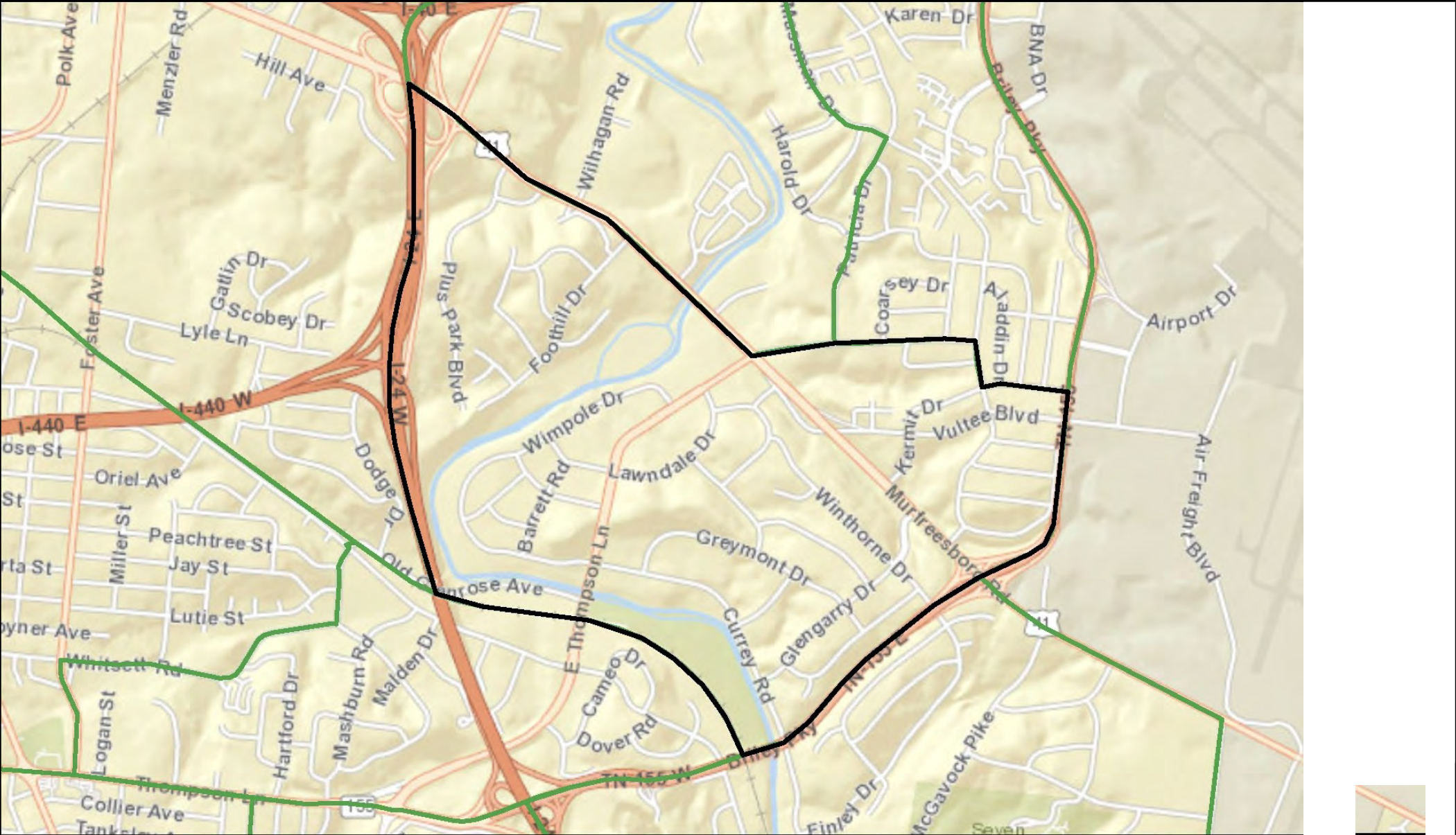
Low Mod Tract



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



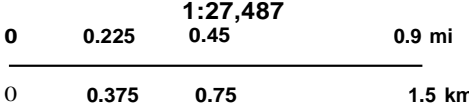
# CPO Maps - Census Tract 015802



April 6, 2015

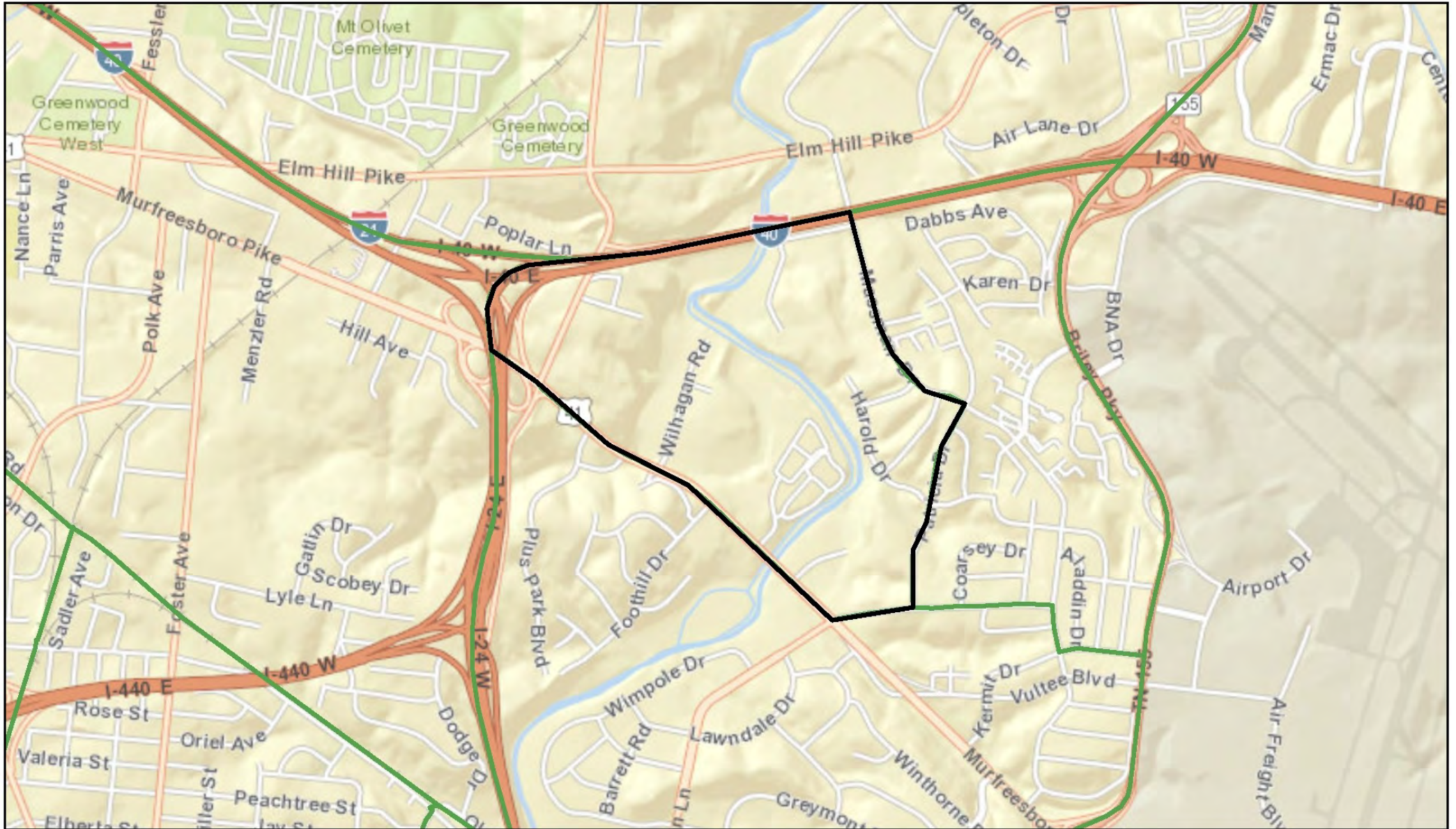
Override 1

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

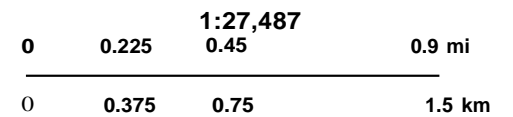
# CPO Maps - Census Tract 015803



April 6, 2015

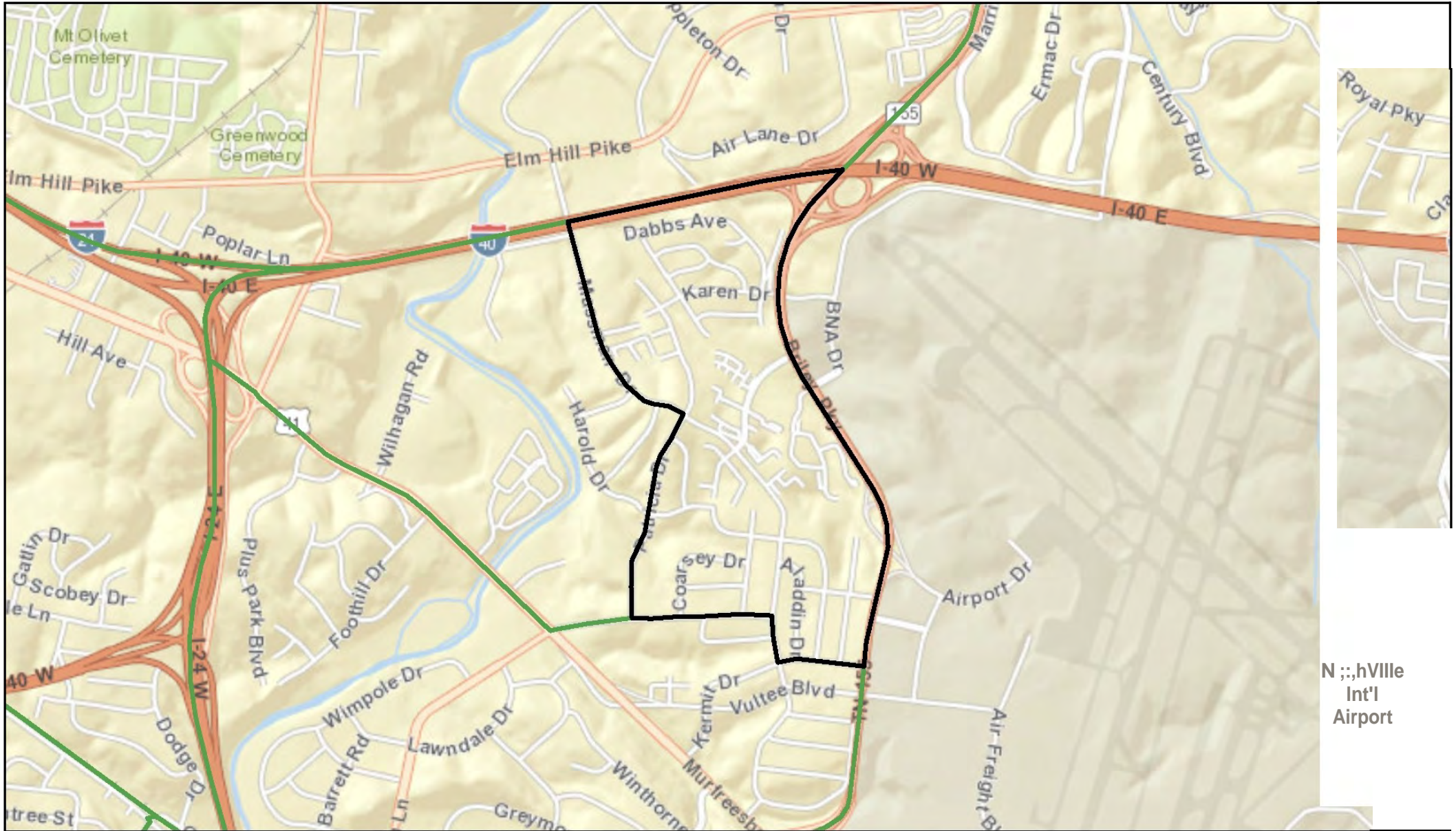
Override 1

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

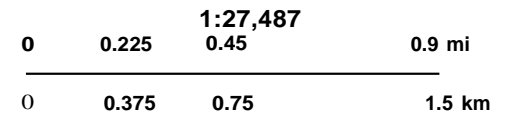
# CPO Maps - Census Tract 015804



April 6, 2015

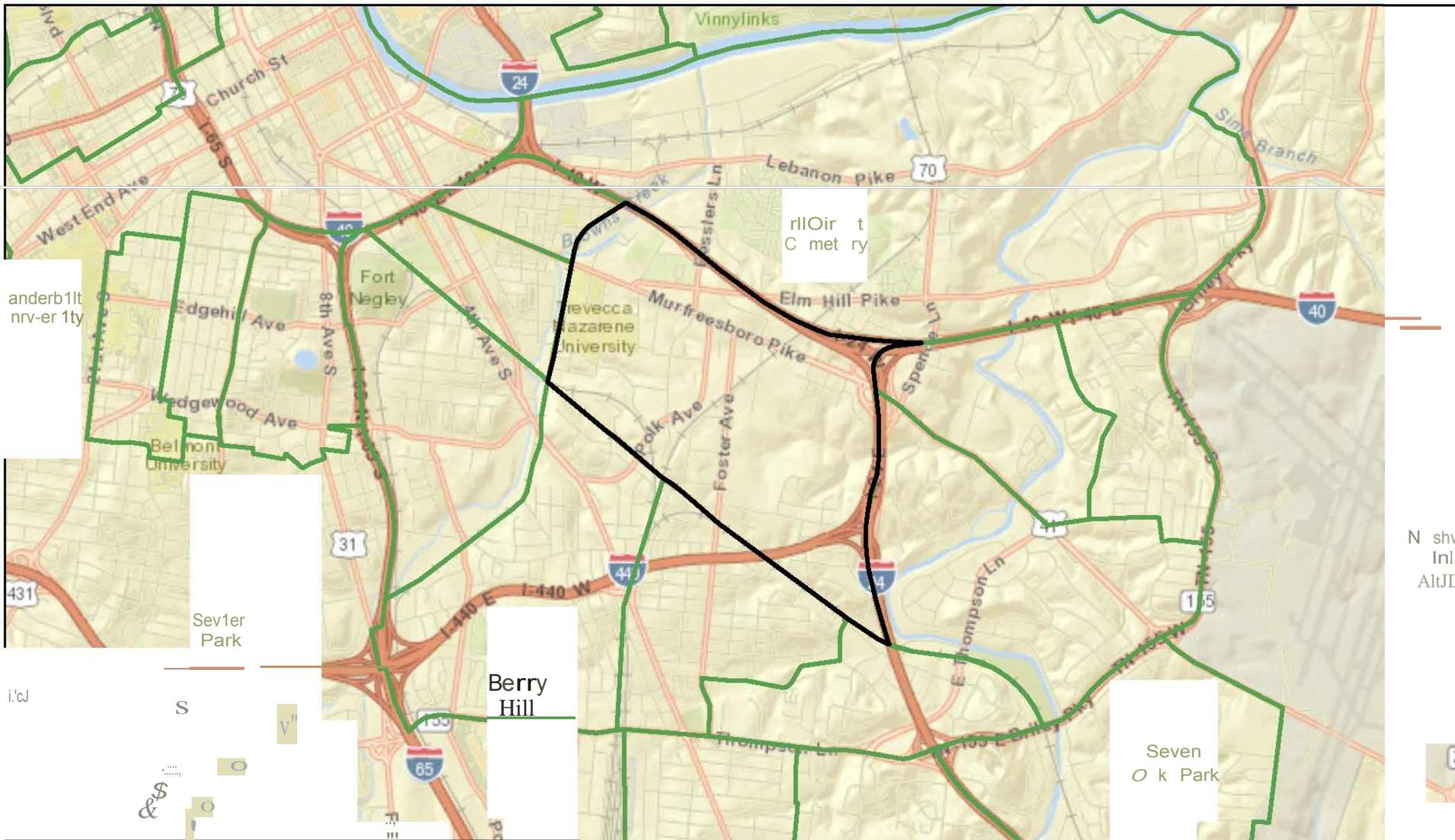
Override 1

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

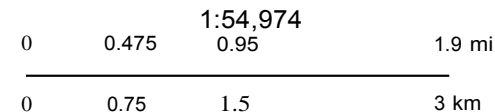
# CPO Maps - Census Tract 015900



April 6, 2015

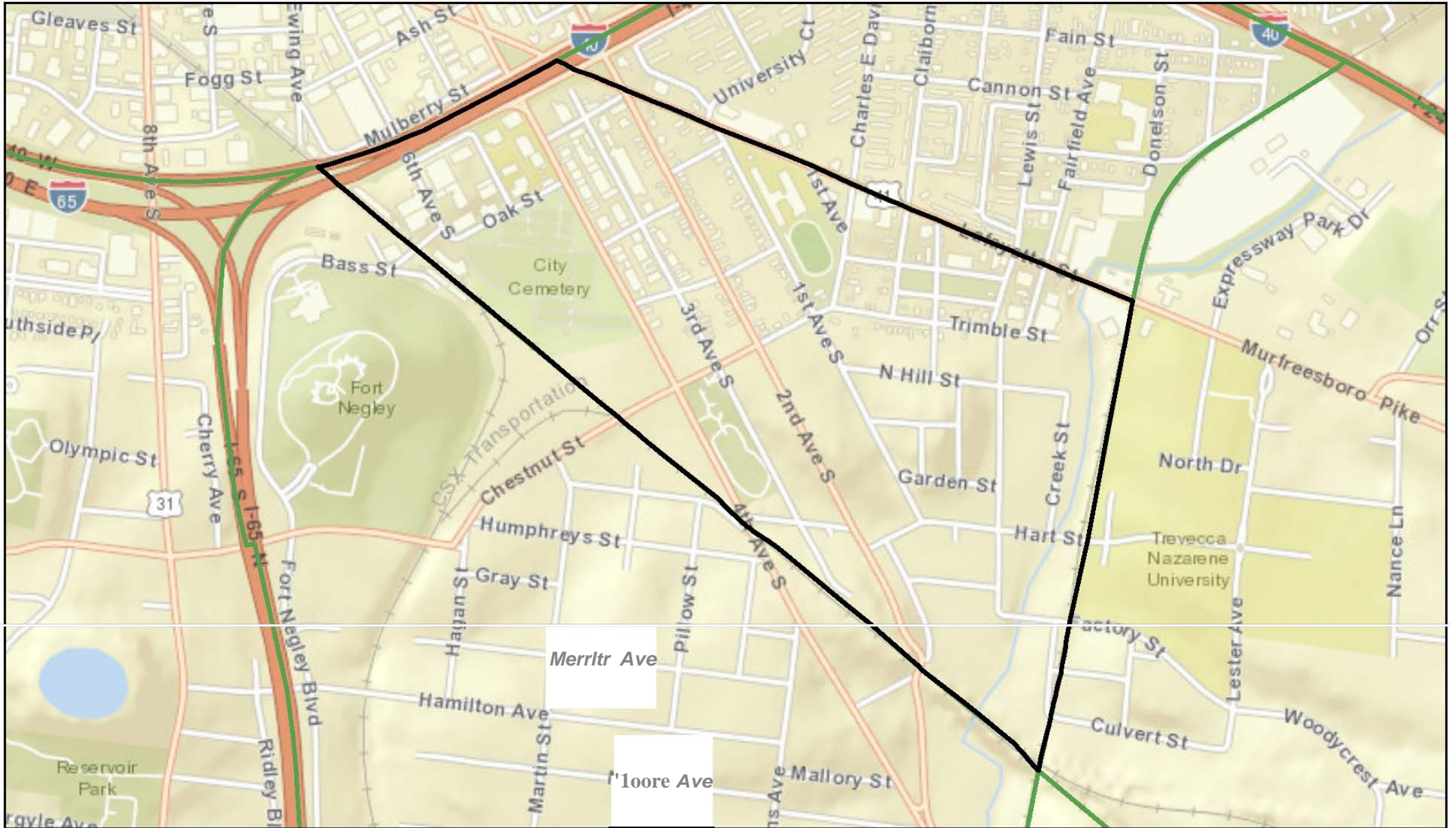
Override 1

Low Mod Tract



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 016000



April 6, 2015

Override 1

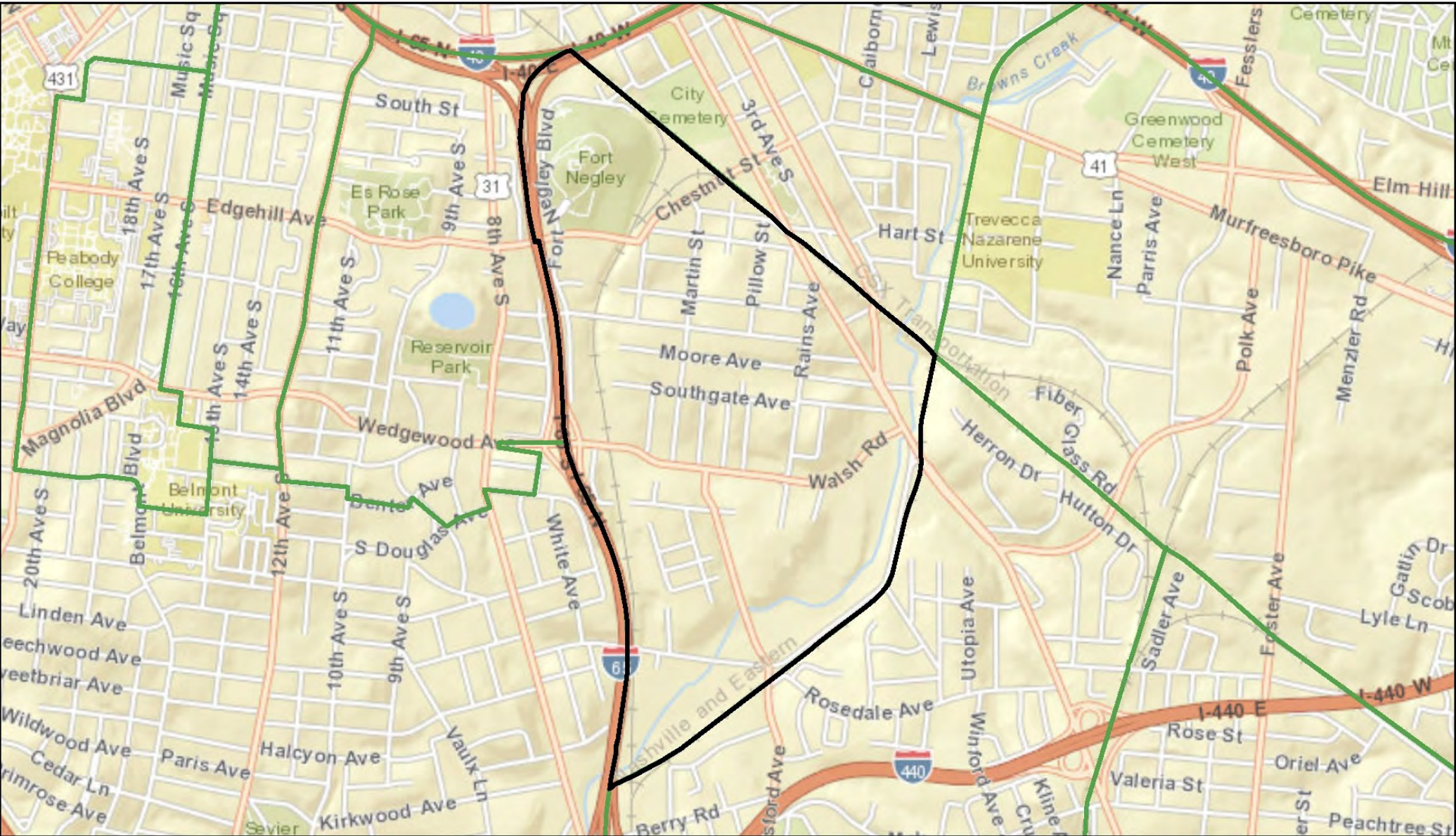
Low Mod Tract

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

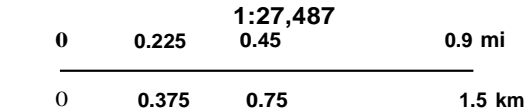
# CPO Maps- Census Tract 016100



April 6, 2015

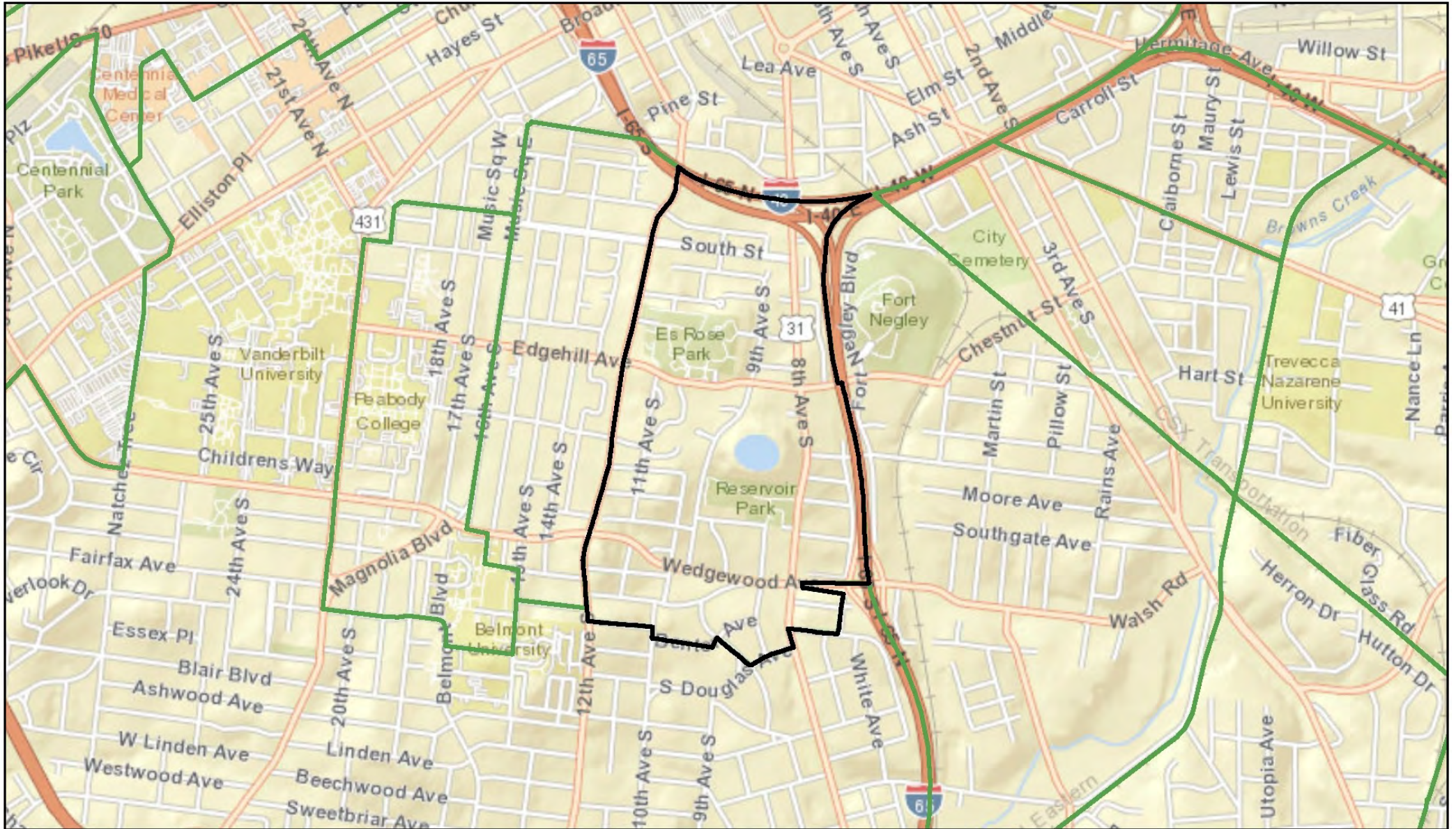
Override 1

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

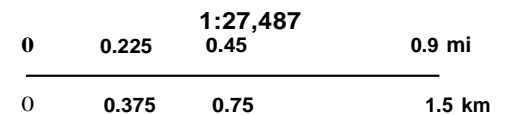
# CPO Maps- Census Tract 016200



April 6, 2015

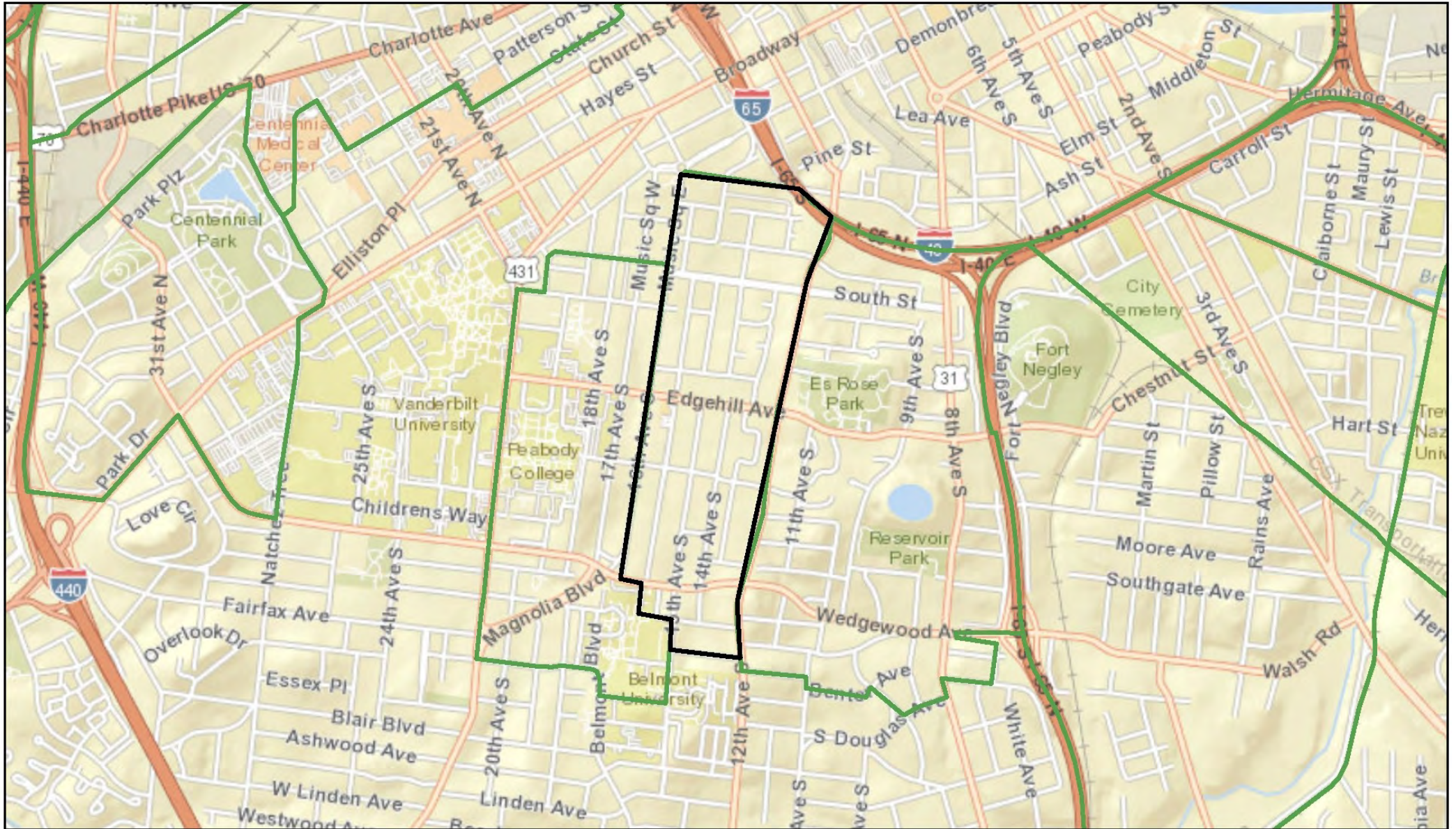
Override 1

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

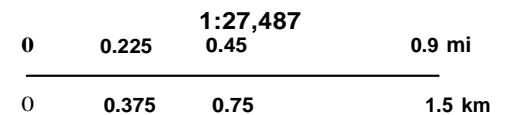
# CPO Maps- Census Tract 016300



April 6, 2015

Override 1

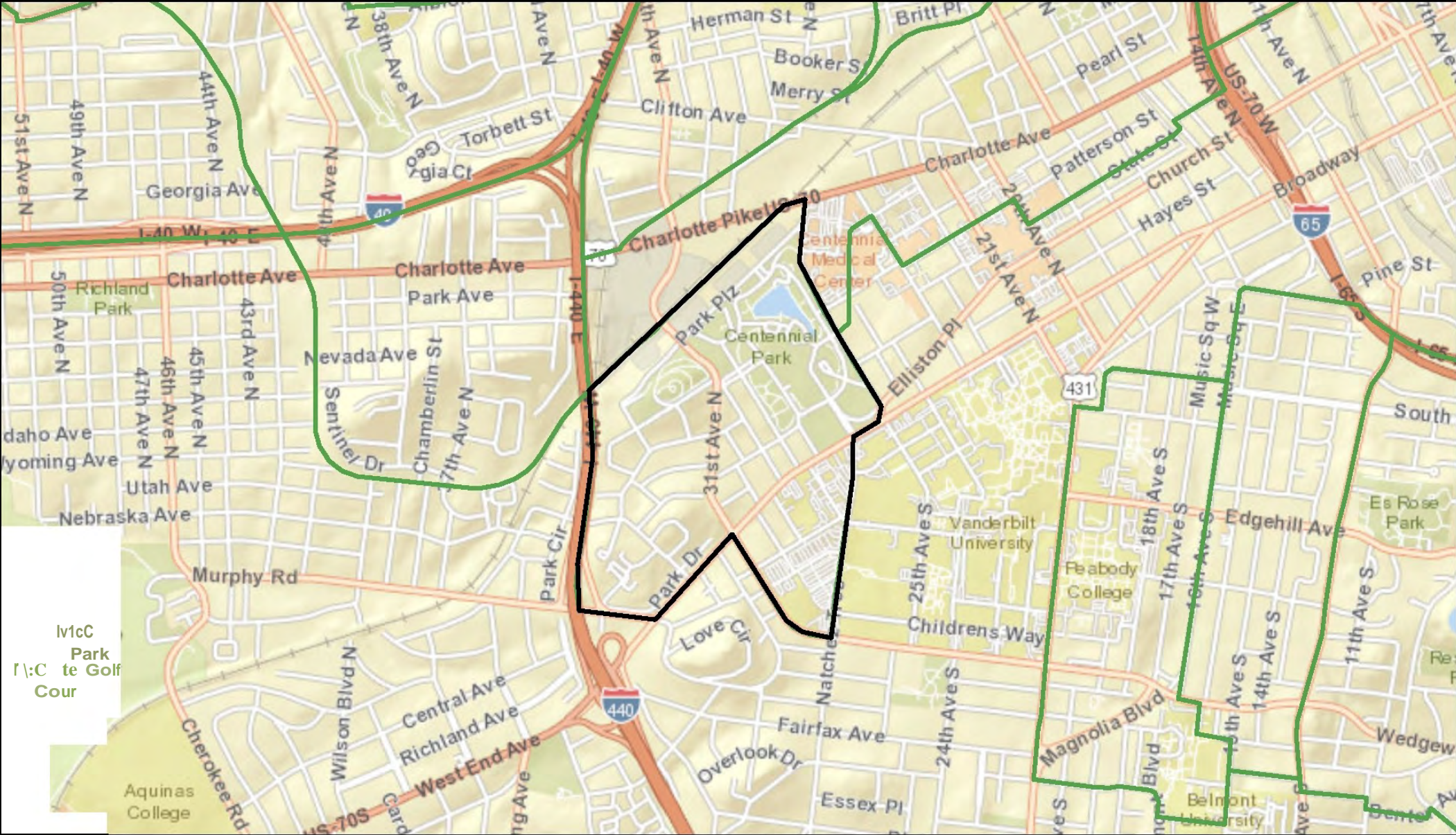
Low Mod Tract



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



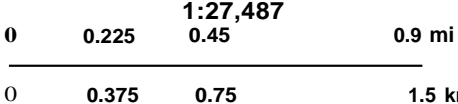
# CPO Maps- Census Tract 016600



April 9, 2015

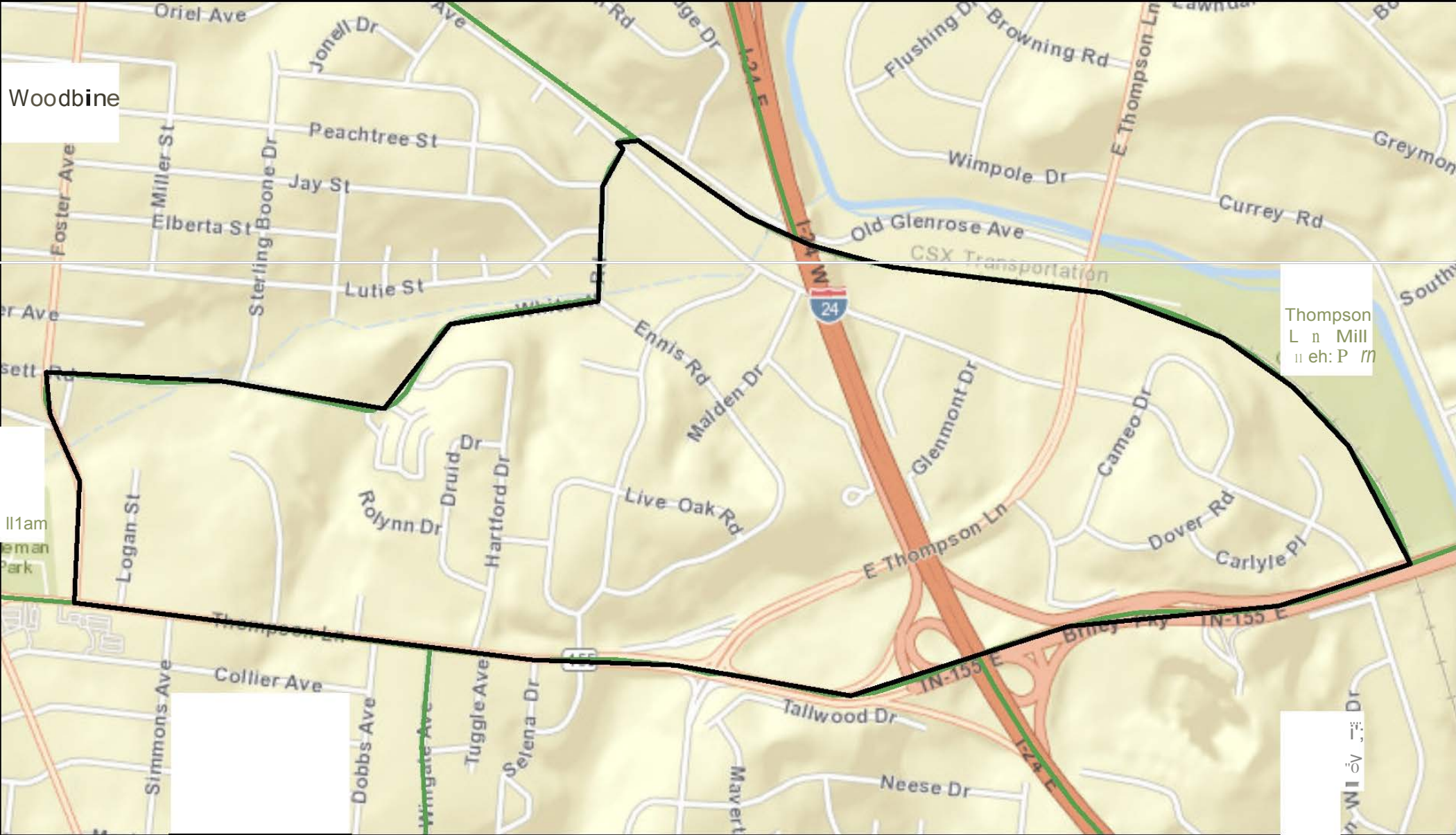
Override 1

Low Mod Tract



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



April 6, 2015

Override 1

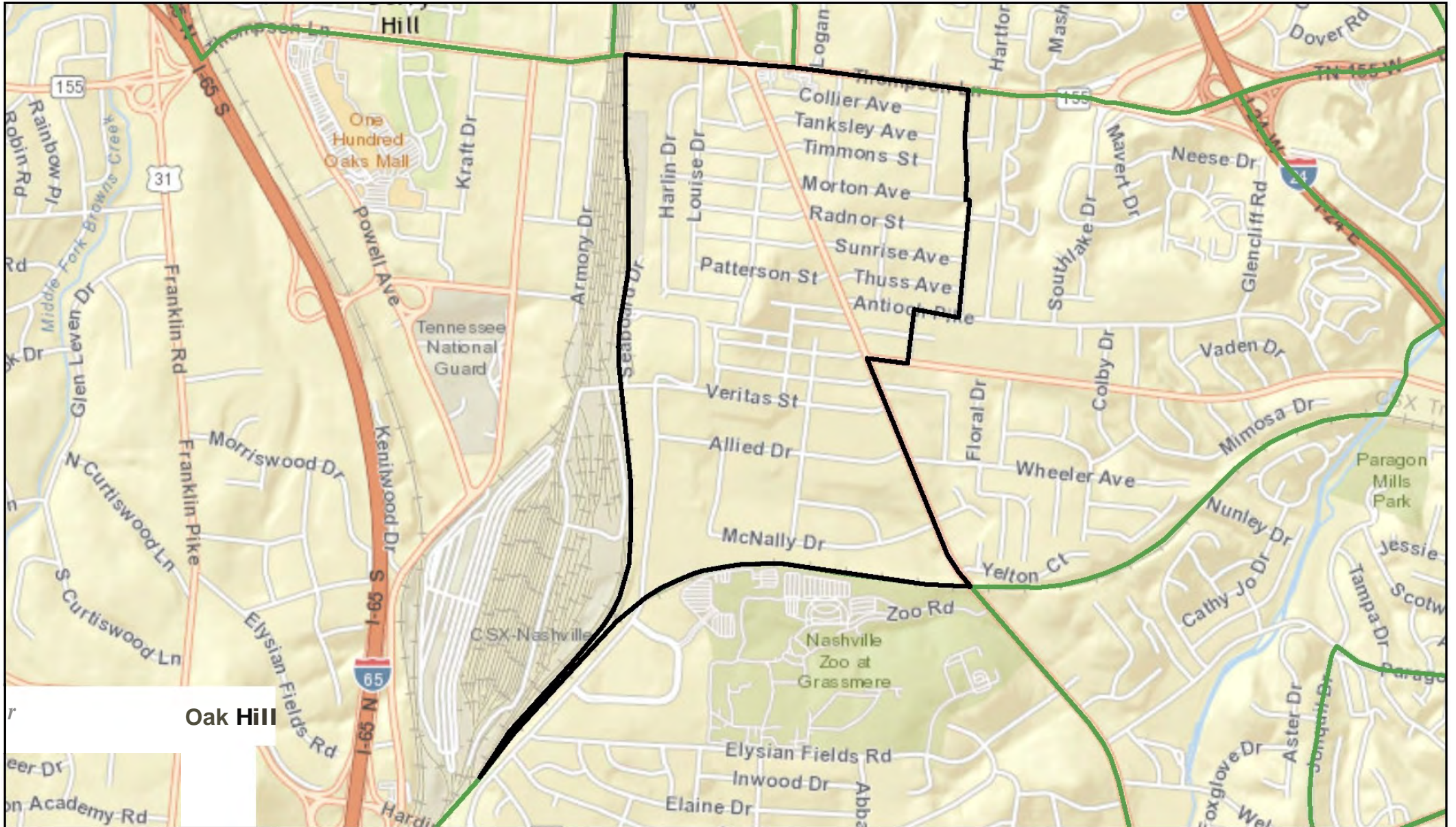
Low Mod Tract

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 017500

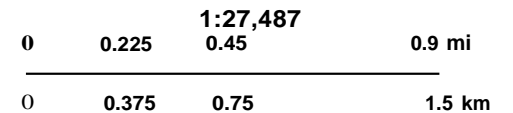


Oak Hill

April 6, 2015

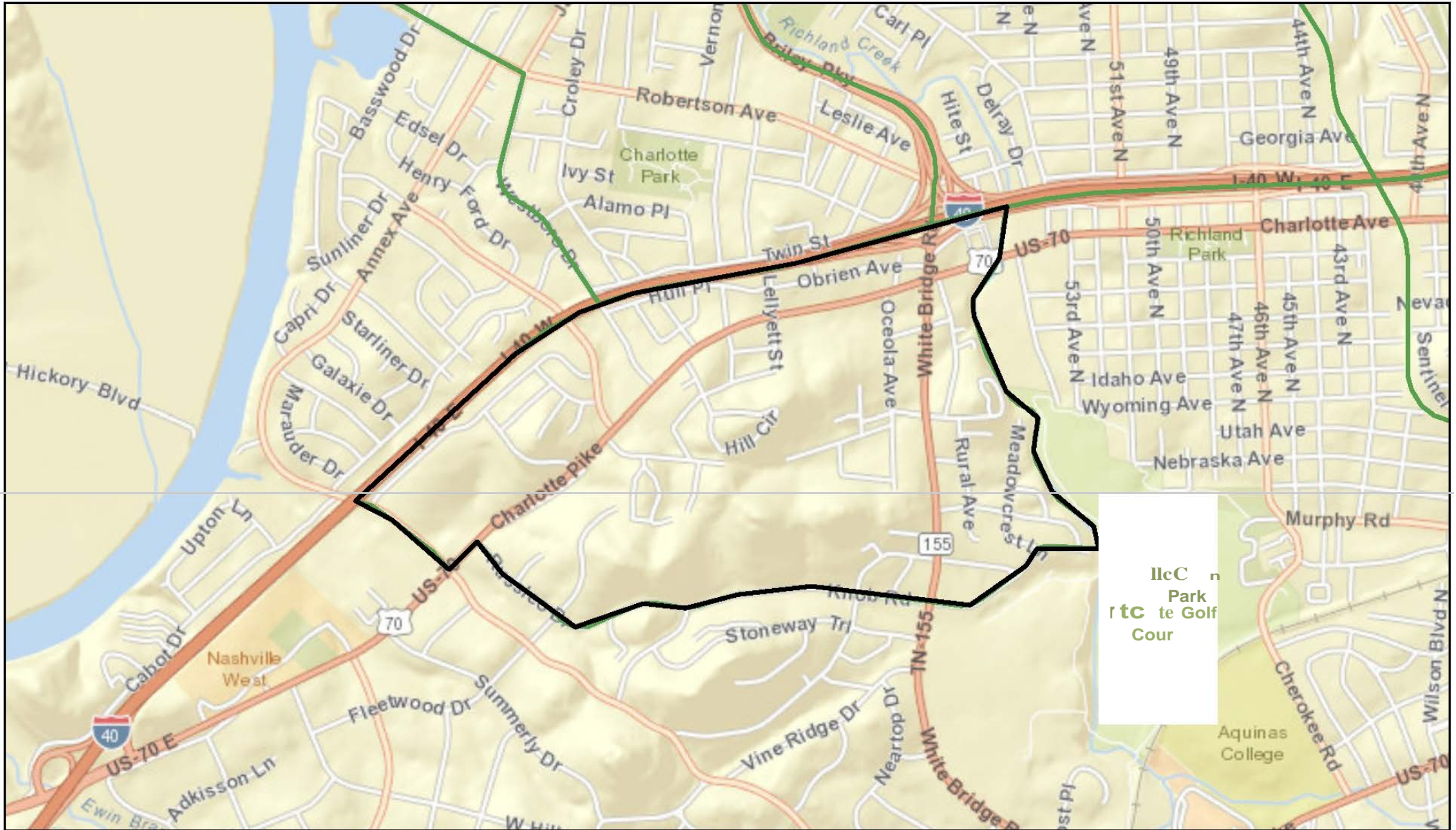
Override 1

Low Mod Tract



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

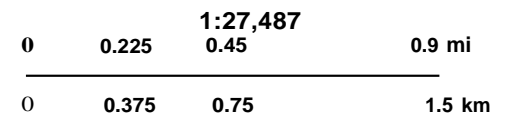
# CPO Maps- Census Tract 018101



April 6, 2015

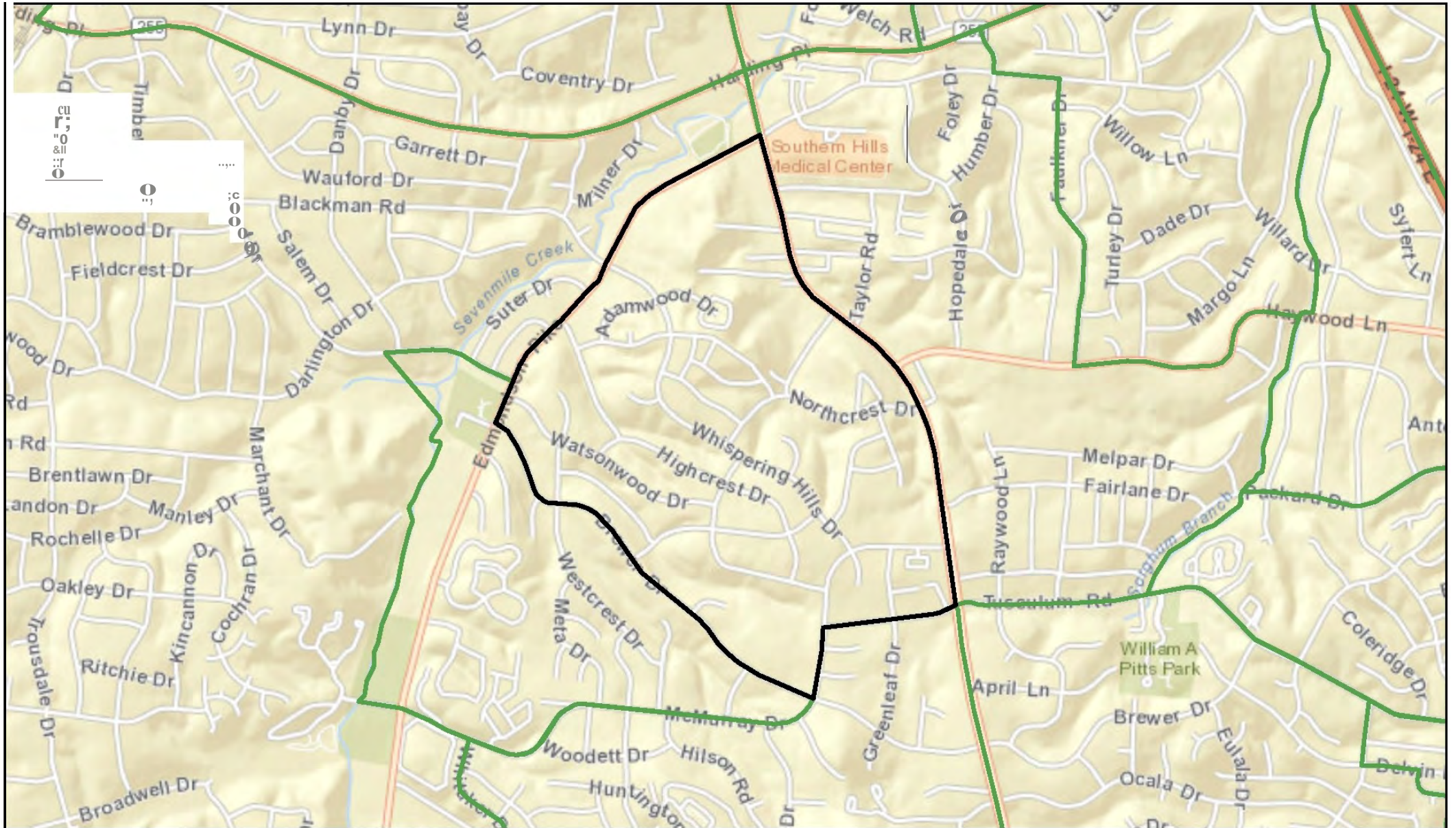
Override 1

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

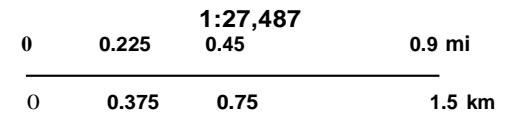
# CPO Maps - Census Tract 018904



April 6, 2015

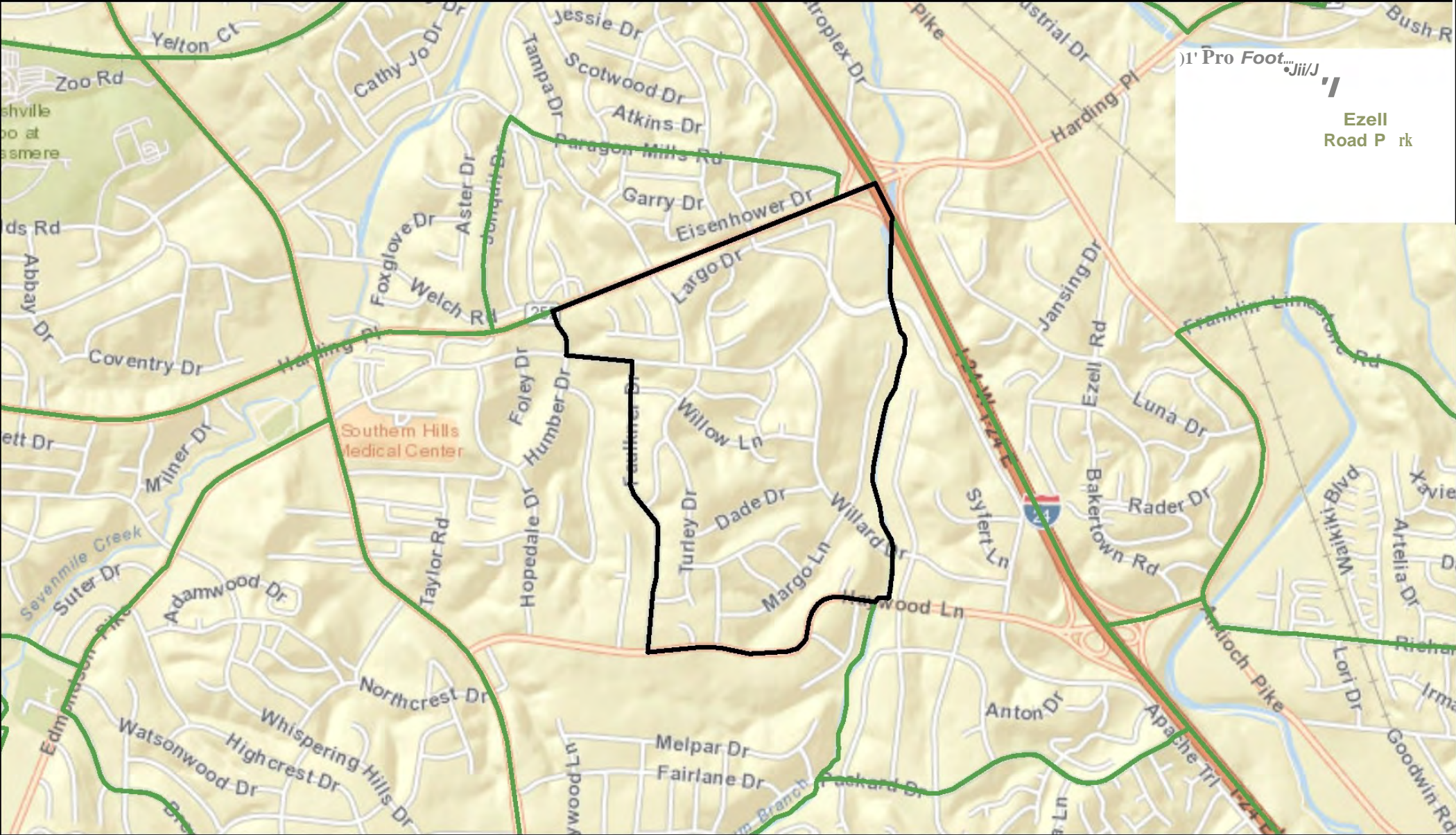
Override 1

Low Mod Tract



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

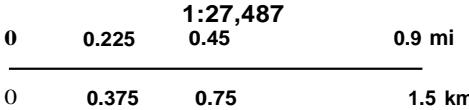
# CPO Maps - Census Tract 019003



April 6, 2015

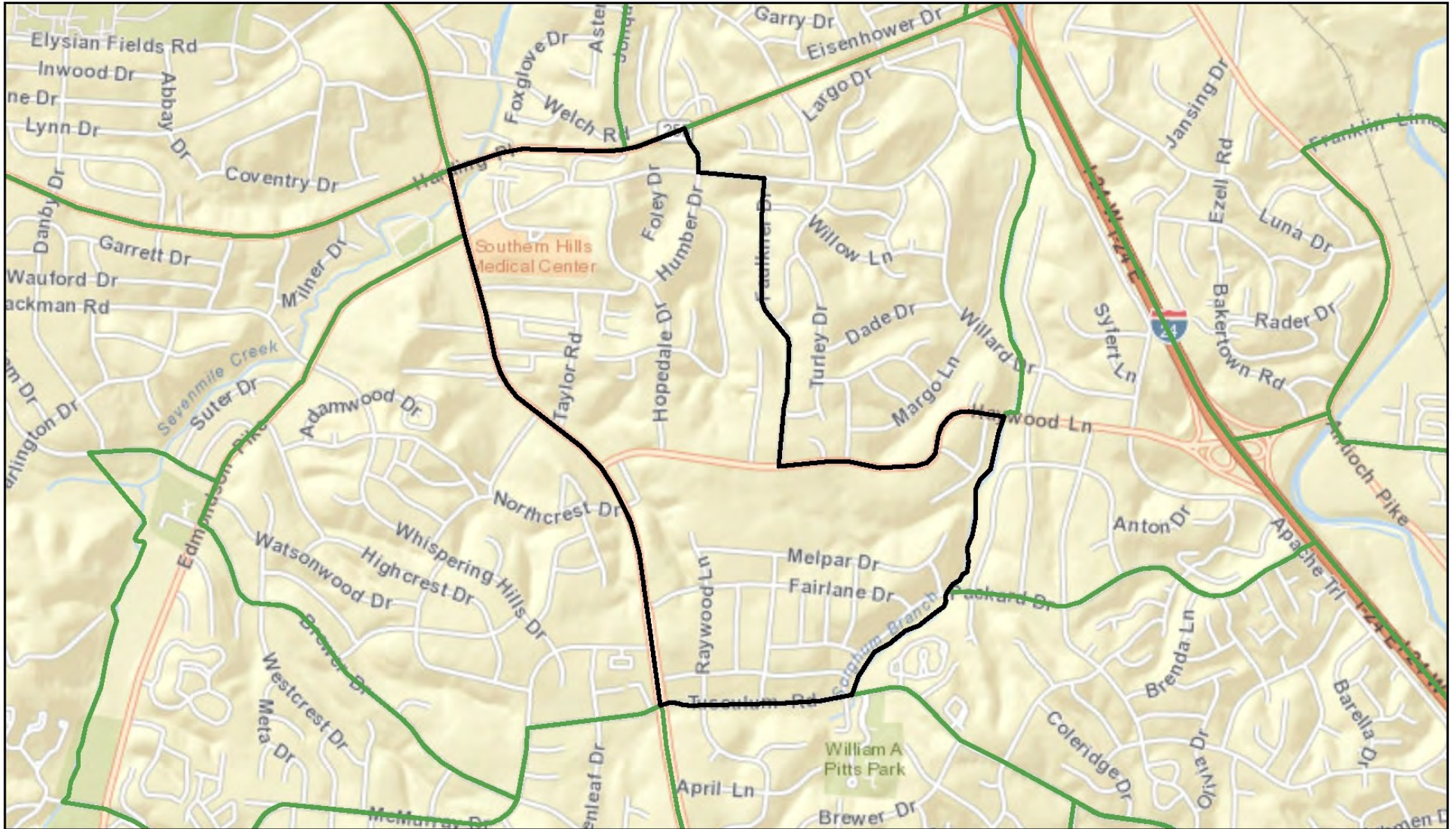
Override 1

Low Mod Tract



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

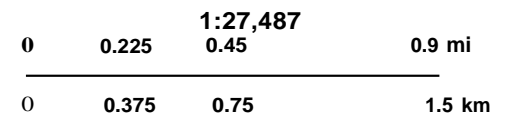
# CPO Maps - Census Tract 019004



April 6, 2015

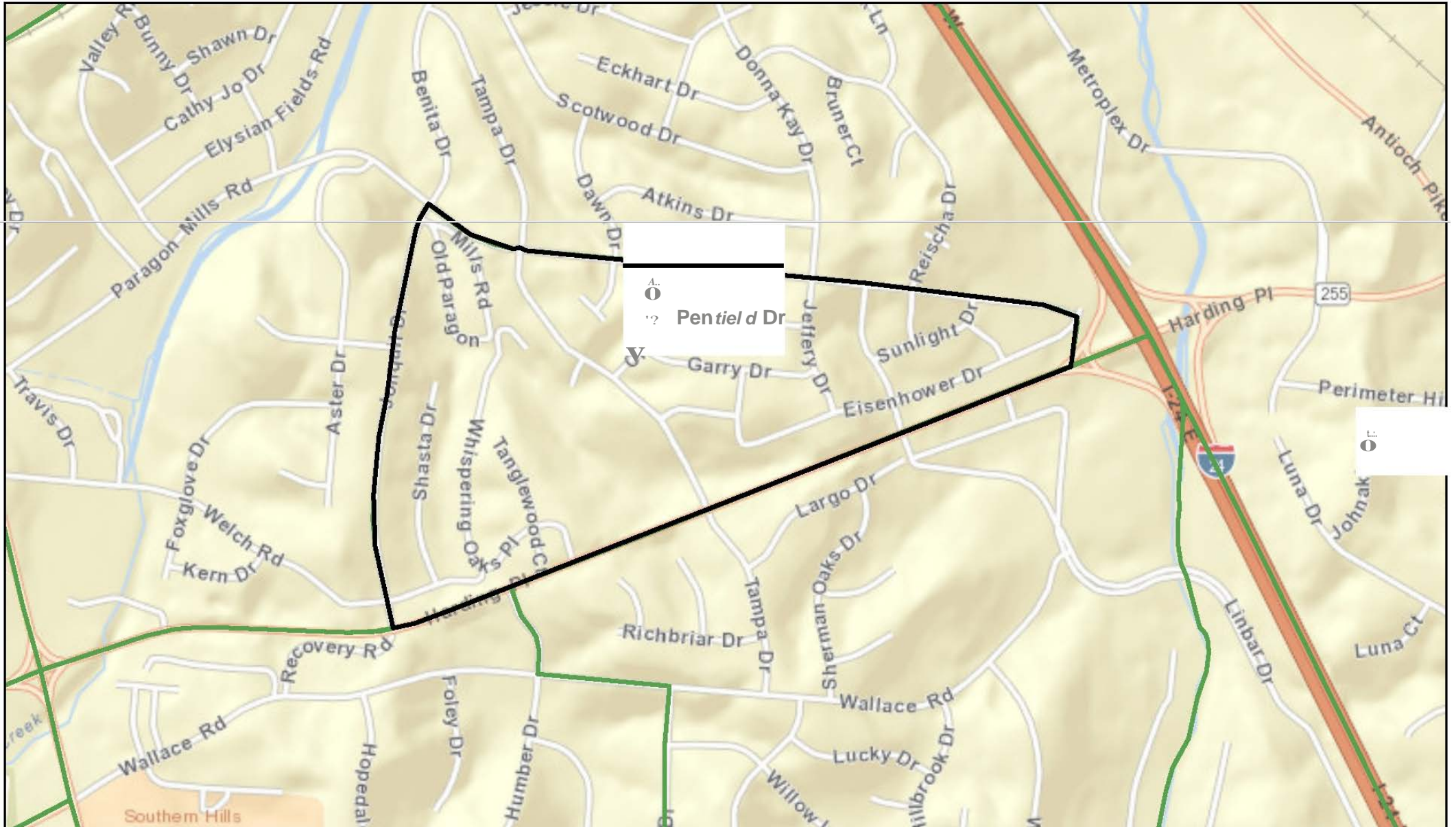
Override 1

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

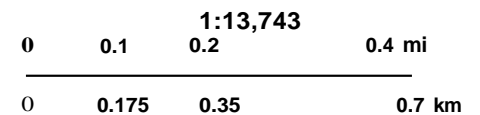
# CPO Maps - Census Tract 019005



April 6, 2015

Override 1

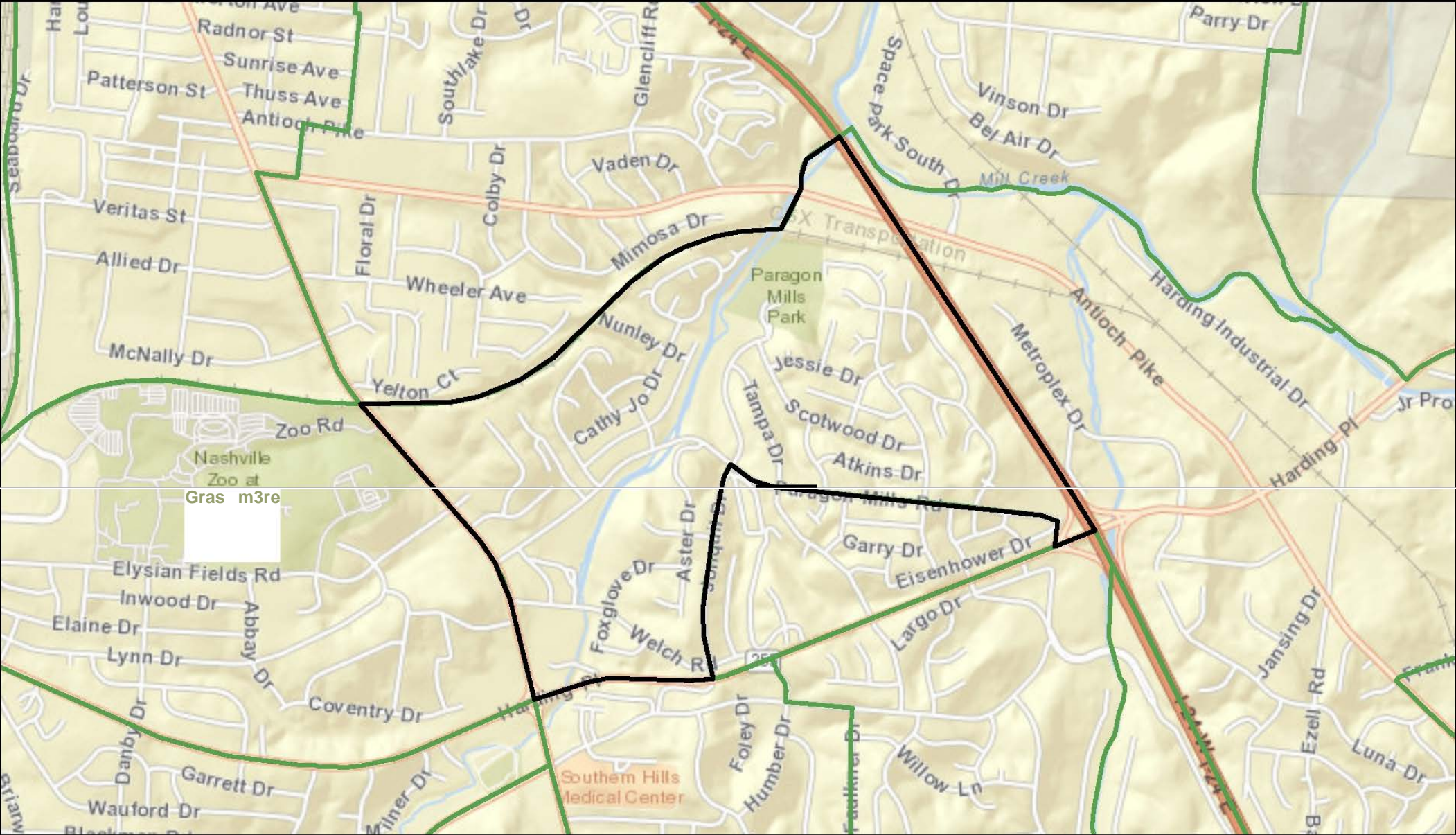
Low Mod Tract



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



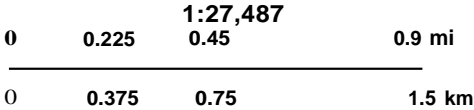
# CPO Maps - Census Tract 019006



April 6, 2015

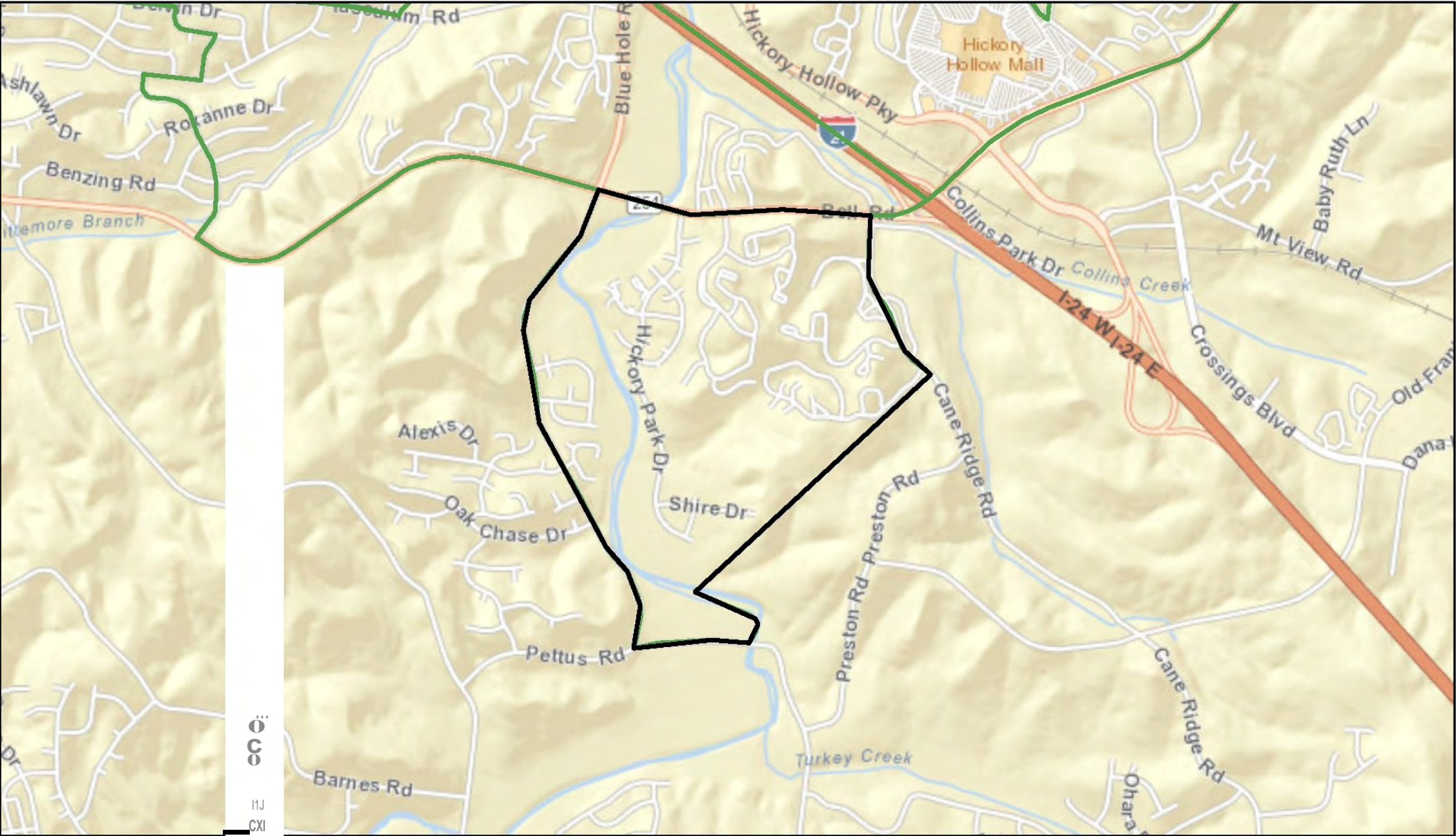
Override 1

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

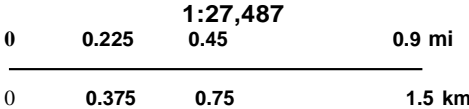
# CPO Maps- Census Tract 019118



April 6, 2015

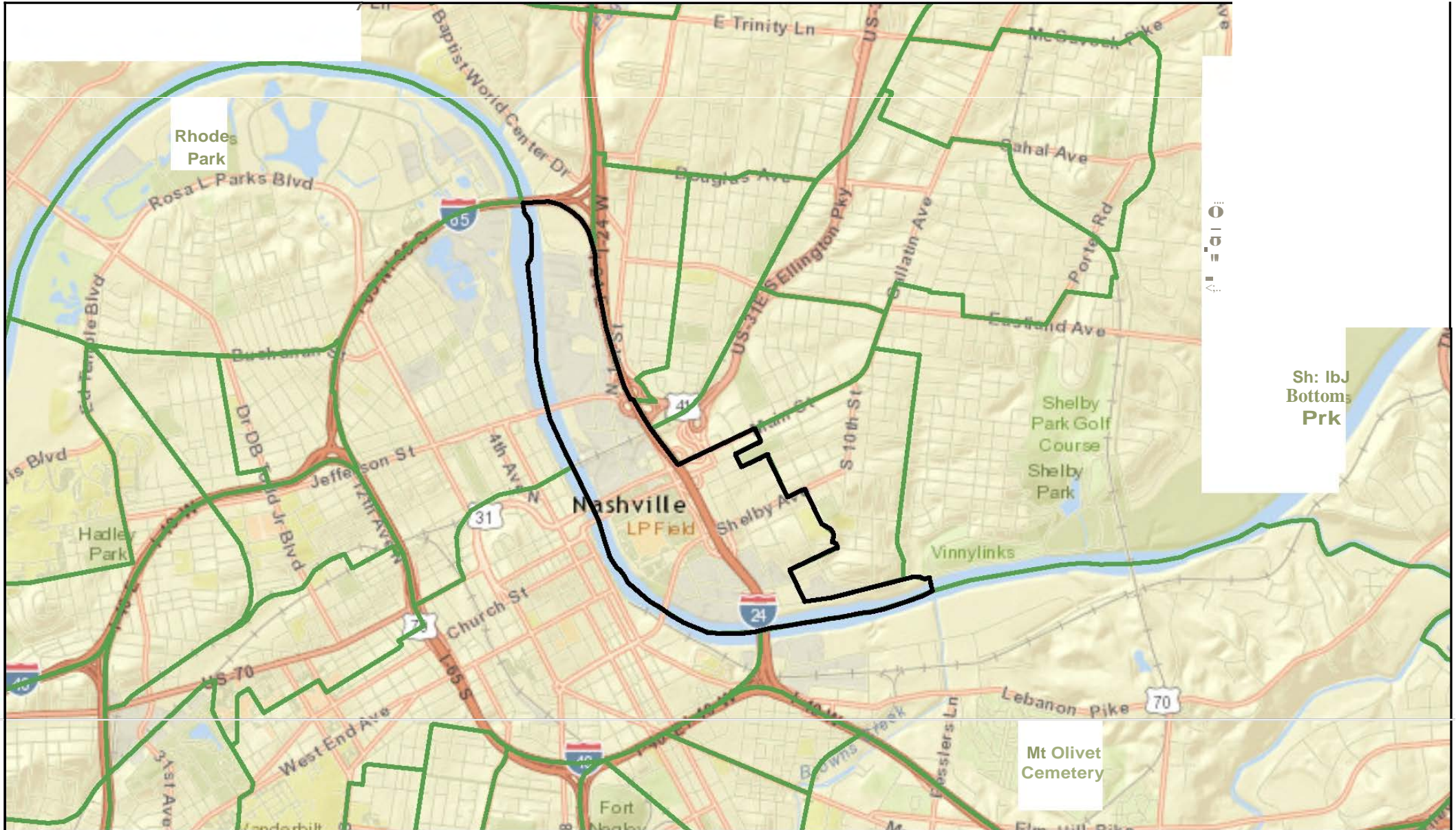
Override 1

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

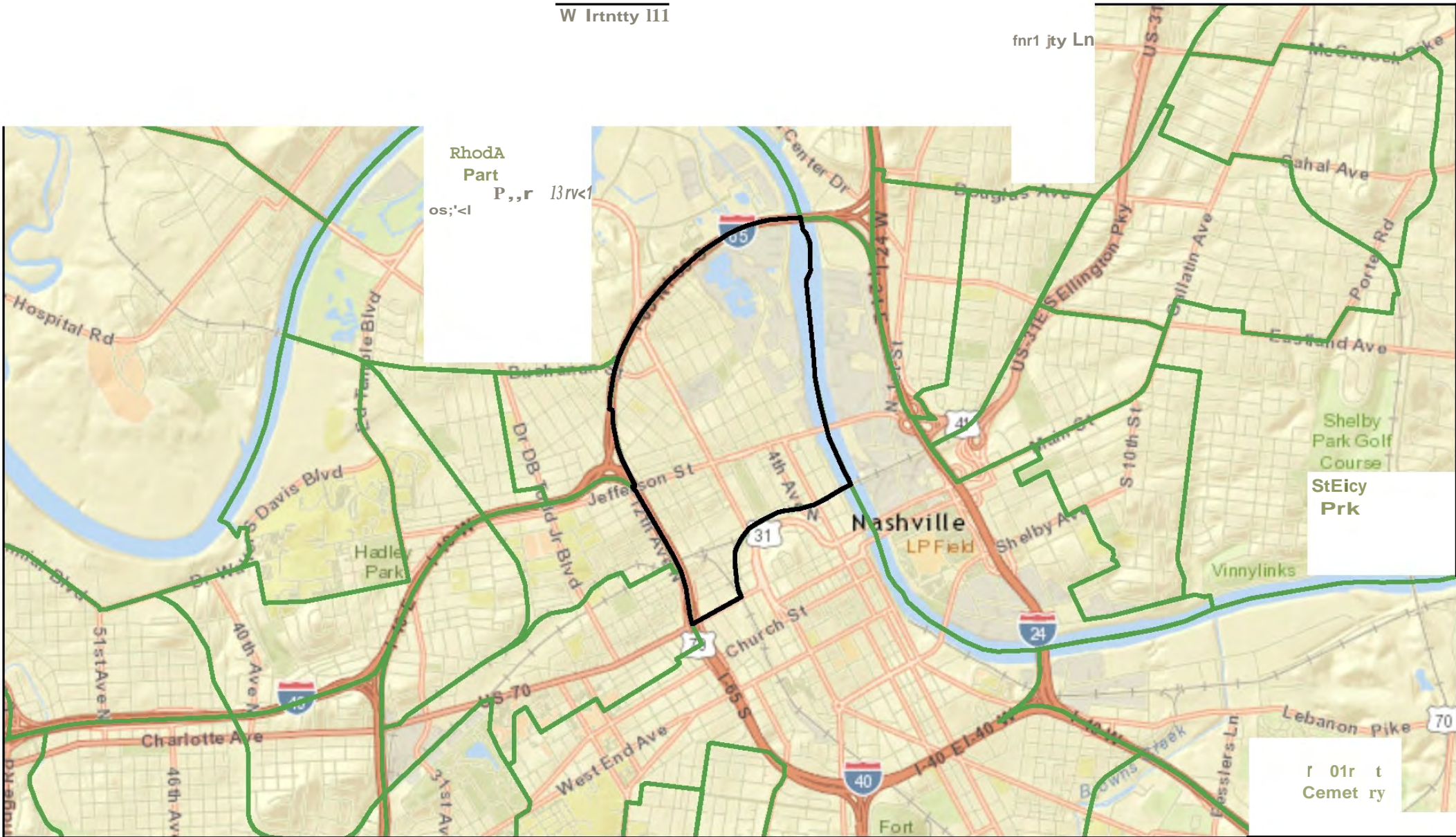
0 0.475 1:54,974 0.95 1.9 mi

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 Irtnntty III



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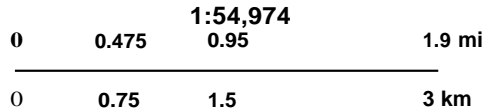
StEicy  
Prk

r 01r t  
Cemet ry

April 9, 2015

Override 1

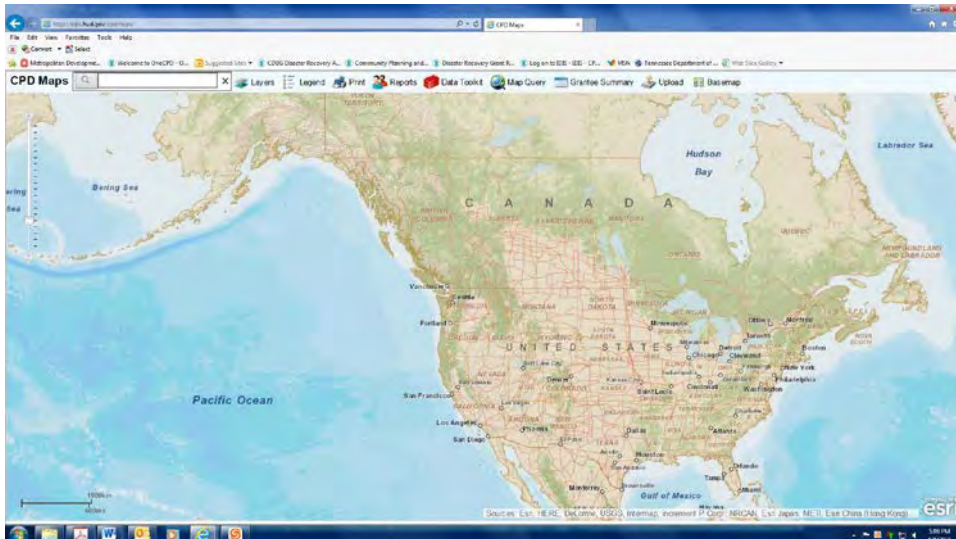
Low Mod Tract



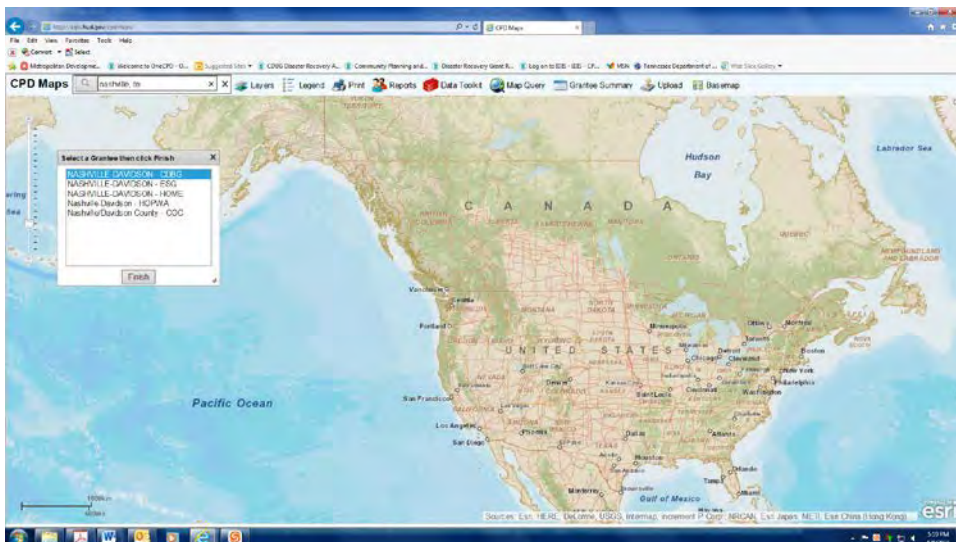
Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTom, MapmyIndia, © OpenstreetMap contributors, and the GIS User Community

## Additional Census Tract Information

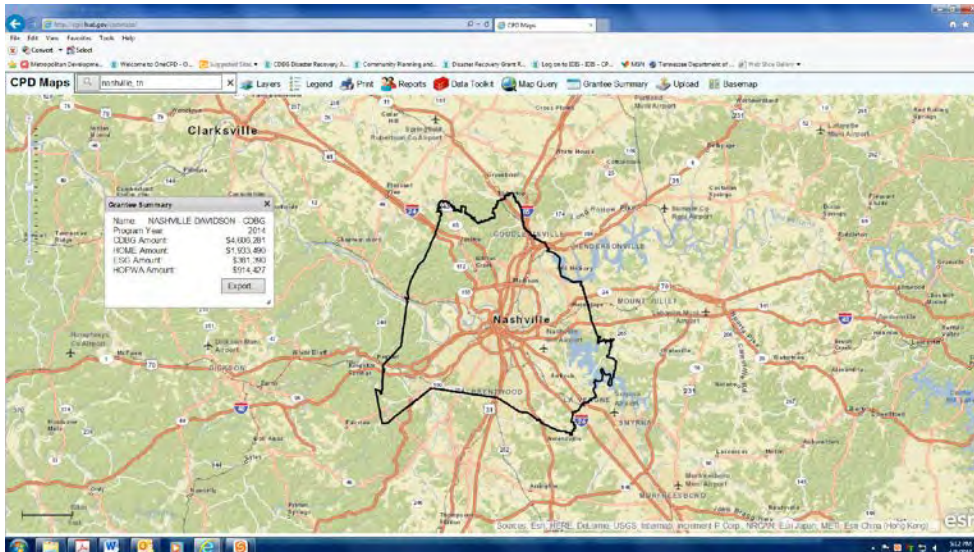
1. Go to: <http://egis.hud.gov/cpdmaps/>.
2. In the search box, type Nashville, TN and hit “Enter”.



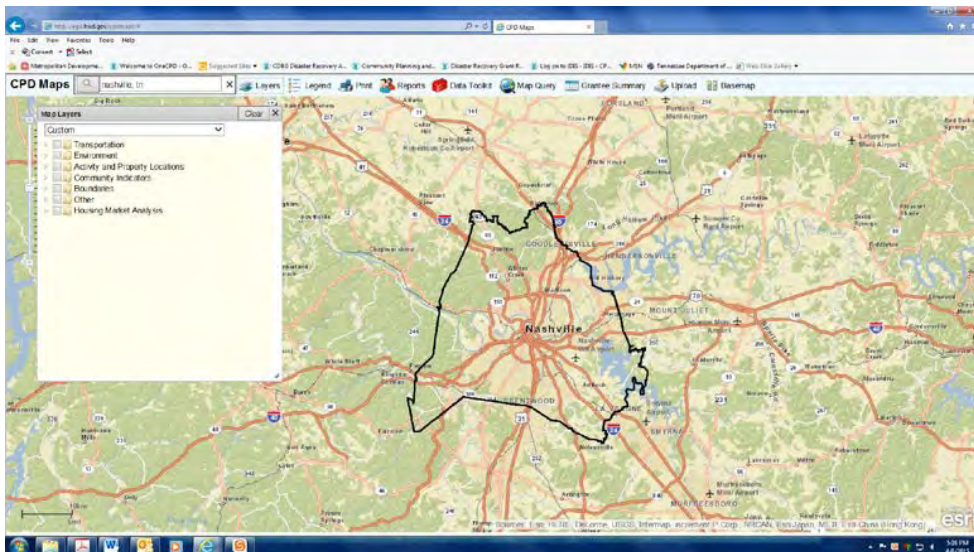
3. Under “Select a Grantee then click Finish”, select Nashville–Davidson CDBG. Click “Finish”.



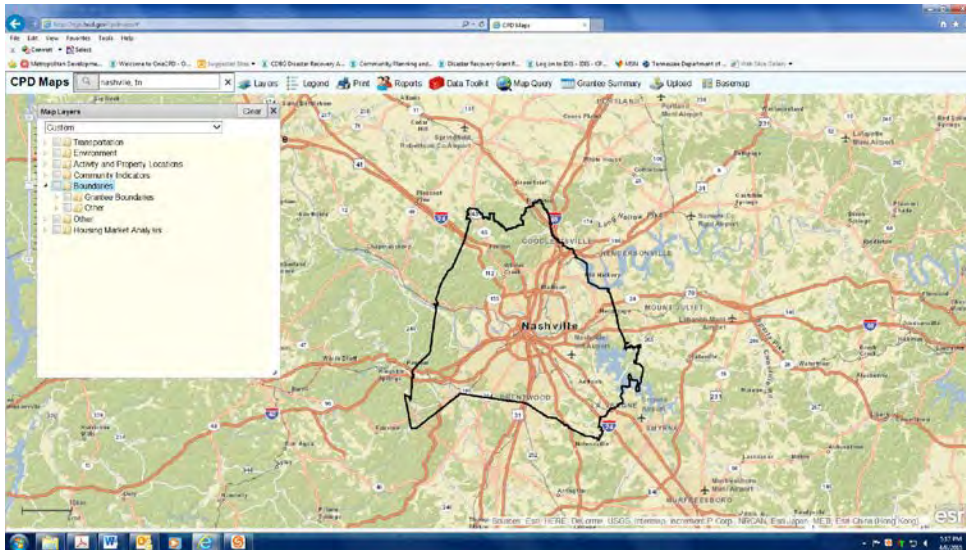
4. A map of Davidson County will appear. Close the “Grantee Summary” box.



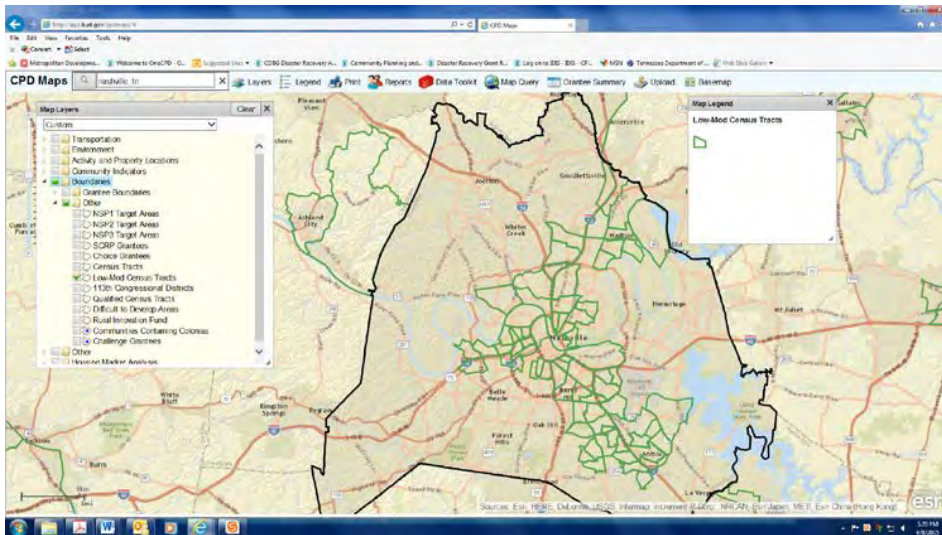
5. Click on the “Layers” icon on the far left. In the box that appears, select “Boundaries”.



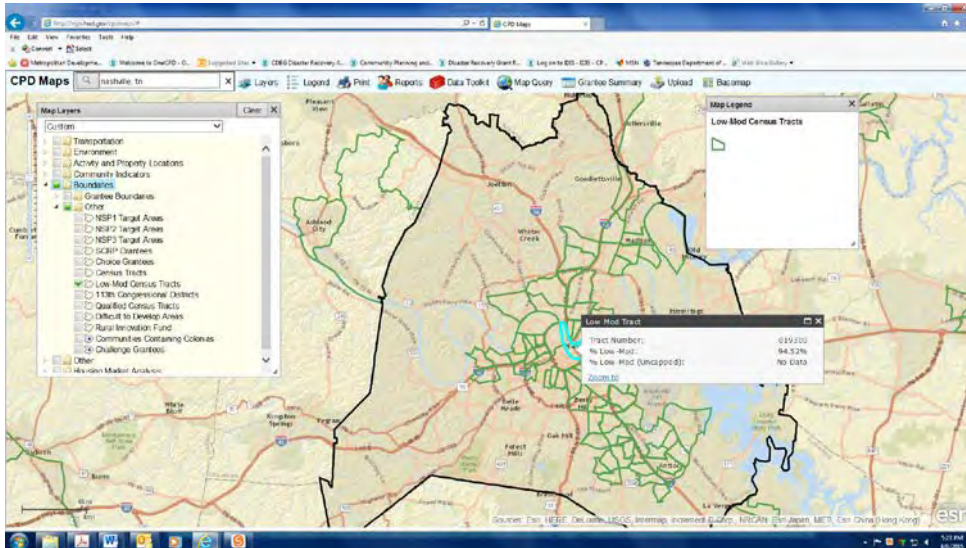
6. Under “Boundaries”, select “Other”.



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.



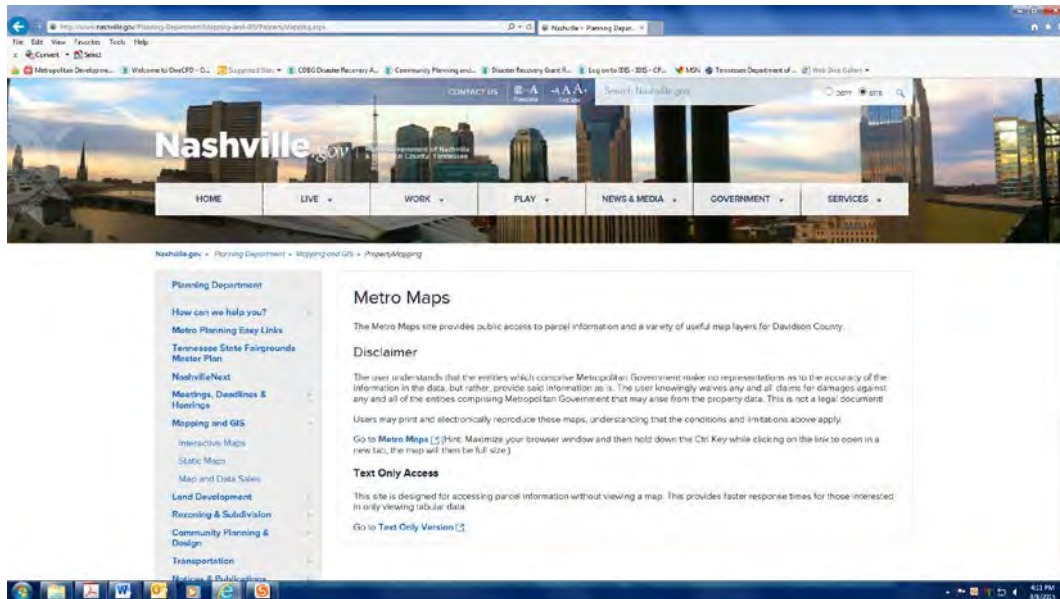
- For more information about this mapping tool, go to: <https://www.hudexchange.info/resources/documents/CPD-Maps-Desk-Guide.pdf>.



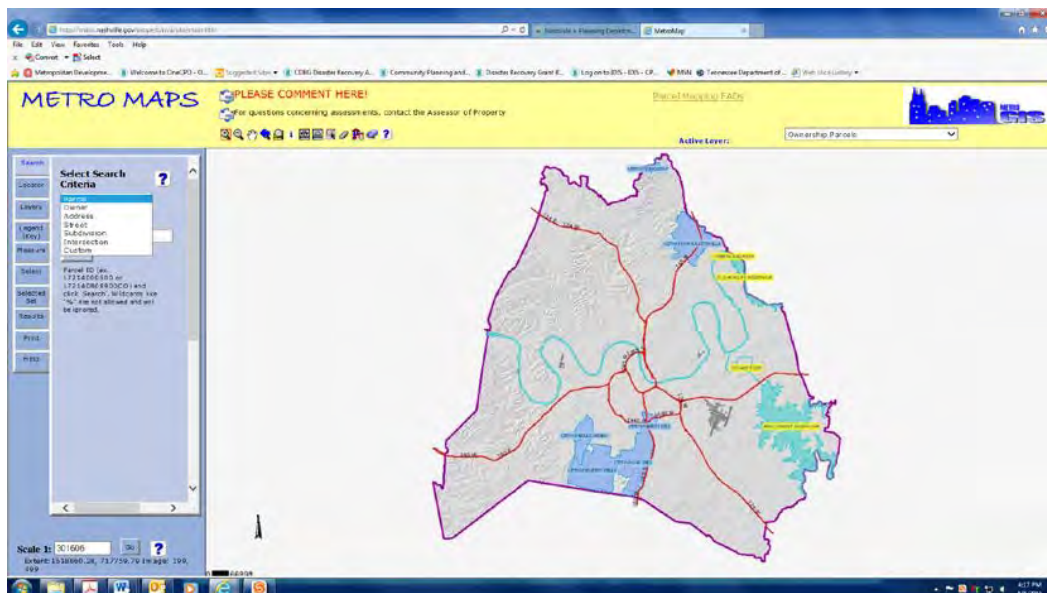
## EXHIBIT 5

### HOW TO DETERMINE YOUR CENSUS TRACT

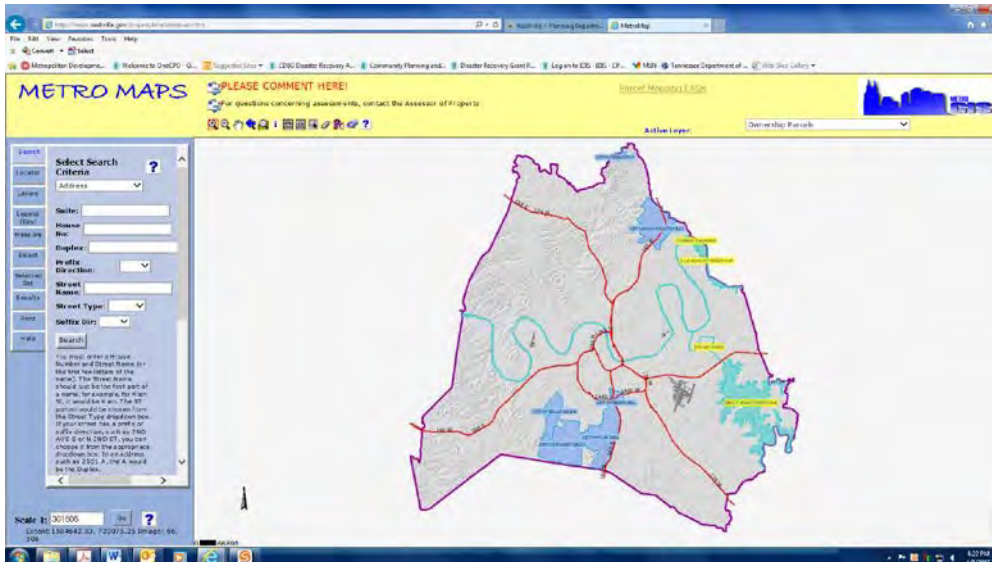
1. Go to: <http://www.nashville.gov/Planning-Department/Mapping-and-GIS/PropertyMapping.aspx>.
2. Click on: **Metro Maps** in the sentence that says, “Go to **Metro Maps**”.



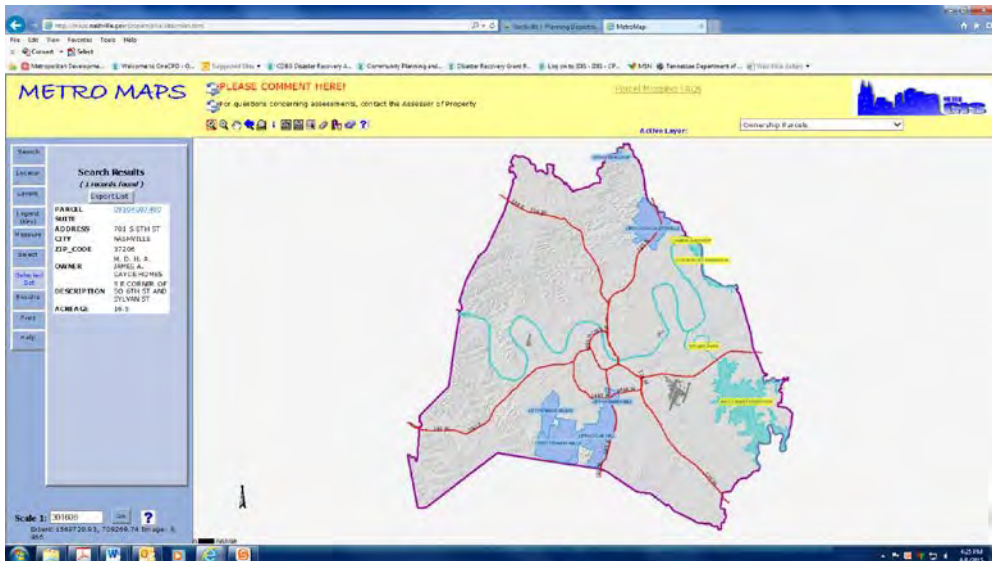
3. In the drop-down box under Select Search Criteria, select Address.



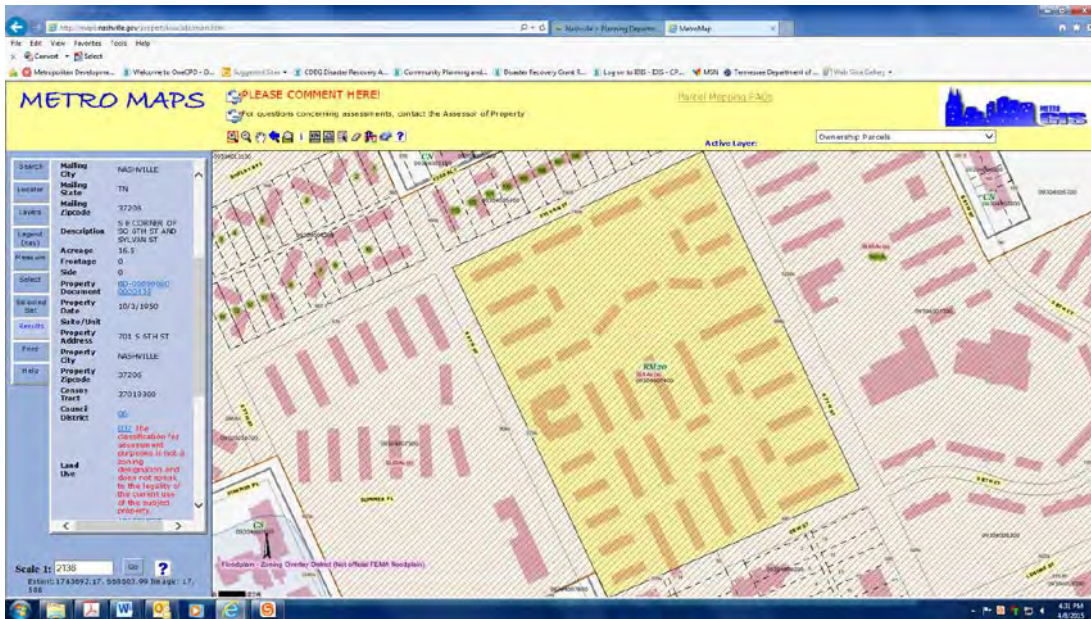
4. Enter your address, and then click on Search.



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.