



# First Program Year Action Plan

The CPMP First Annual Action Plan includes the [SF 424](#) and Narrative Responses to Action Plan questions that CDBG, HOME, HOPWA, and ESG grantees must respond to each year in order to be compliant with the Consolidated Planning Regulations. The Executive Summary narratives are optional.

## Narrative Responses

### GENERAL

#### Executive Summary

The Executive Summary is required. Include the objectives and outcomes identified in the plan and an evaluation of past performance.

Program Year 1 Action Plan Executive Summary:

Each year, the U.S. Department of Housing and Urban Development (HUD) grants funds to the Metropolitan Government of Nashville and Davidson County through the Consolidated Planning process and its four federal programs: the Community Development Block Grant (CDBG), Home Investment Partnership (HOME), Emergency Solutions Grant (ESG), and Housing Opportunities for Persons with AIDS (HOPWA). The Metropolitan Council designated the Metropolitan Development and Housing Agency (MDHA) to act as the lead agency responsible for the development and administration of the Consolidated Plan and its four related programs.

This annual action plan describes how these federal funds will be used to carry out the strategies and programs outlined in the five-year Consolidated Plan during the 2010 program year, beginning April 1<sup>st</sup>, 2010 and ending March 31<sup>st</sup>, 2011. The plan is written to conform to the federal regulations found at 24 CFR Part 91 and the most recent guidance issued by HUD.

The total estimated Consolidated Plan budget of \$10,547,215 is comprised of the following sources:

Program	HUD 2010 Allocation
CDBG	\$5,865,283 *
HOME	\$3,541,134 *
ESG	\$218,915
HOPWA	\$903,441
TOTAL	\$10,547,215

*\*Includes estimated program income*

All programs and activities proposed in this annual action plan are designed to carry out the strategies adopted in the five-year Consolidated Plan. All activities are intended to primarily benefit low and moderate income residents. Funded projects are summarized in the table on the following page. A complete description of each project is included in Appendix A.

**Proposed Projects for 2010 Program Year**

<b>PROGRAM</b>	<b>ESTIMATE</b>
<b>CDBG</b>	
Neighborhood Improvement Program	\$1,350,000
Community Economic Development Program	\$440,000
Community Services Program	\$815,000
Homeowner Emergency Rehabilitation	\$1,258,336
Estimated Program Income	\$471,917
Section 108 Loan Repayment	\$445,000
General Administration	\$600,000
Planning	\$375,000
Non-profit Planning and Capacity Building	\$110,000
<b>Total</b>	<b>\$5,865,283</b>
<b>HOME</b>	
Downpayment Assistance	\$510,000
Homeowner Rehabilitation	\$550,800
Rental Rehabilitation	\$306,000
Affordable Housing Program	\$1,407,600
<i>Community Housing Development Organization Set-Aside</i>	<i>(\$489,600)</i>
Estimated Program Income	\$277,416
CHDO Operating Support	\$163,200
Administration	\$326,118
<b>Total</b>	<b>\$3,541,134</b>
<b>ESG</b>	
Shelter Operations	\$120,000
Essential Services	\$62,000
Homeless Prevention	\$26,000
Administration	\$10,915
<b>Total</b>	<b>\$218,915</b>
<b>HOPWA</b>	
Rental Assistance	\$357,850
Supportive Services	\$455,500
Administrative Services	\$63,000
Grant Administration	\$27,091
<b>Total</b>	<b>\$903,441</b>

### Objectives and Outcomes

Per HUD guidance, MDHA has assigned an objective that best describes the purpose for funding each and an outcome that best reflects the intended benefit. The three objectives are to create a suitable living environment, provide decent housing, and create economic opportunities. The three outcomes are increasing availability and accessibility, improving affordability, and promoting sustainability of communities. The table below summarizes the objectives and outcomes for the 2010 projects by dollar amount.

Objectives	Outcomes			Total
	Availability	Affordability	Sustainability	
Suitable Living Environment	\$2,262,215		\$2,172,000	\$4,434,215
Decent, Affordable Housing	\$2,600,000	\$3,100,000		\$5,700,000
Economic Opportunities	\$440,000			\$440,000
Total	\$5,302,215	\$3,100,000	\$2,172,000	\$10,574,215

### Past Performance

MDHA has a history of high performance in all four of the HUD programs. In the past, MDHA has spent CDBG funds on the following types of eligible activities:

Eligible Use	Percent
Land Acquisition	12%
Economic Development	3%
Housing	26%
Public Improvements	26%
Public Services	6%
Section 108 Loan Repayment	9%
Administration and Planning	19%

HOME funds are limited to affordable housing programs. MDHA began its participation in the HOME program in 1992. To date, MDHA has assisted 1,445 affordable rental units, assisted 1,211 homebuyers, and rehabilitated 719 units of owner-occupied housing.

ESG funds may be used for programs and projects that benefit the homeless. In previous years, the ESG program has served roughly 2,000 persons per year through grants that support local emergency and transitional shelters. The program has also provided financial assistance to households to prevent homelessness.

HOPWA funds focus on providing housing assistance and other supportive services to persons living with HIV/AIDS. In previous years, the program has served approximately 600 persons per year through supporting local non-profit agencies participating in the HOPWA program.

As part of this Consolidated Plan, MDHA has redesigned its programs to focus on performance and monitoring compliance and hopes to build on its history of success.

## General Questions

1. Describe the geographic areas of the jurisdiction (including areas of low income families and/or racial/minority concentration) in which assistance will be directed during the next year. Where appropriate, the jurisdiction should estimate the percentage of funds the jurisdiction plans to dedicate to target areas.
2. Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA) (91.215(a)(1)) during the next year and the rationale for assigning the priorities.
3. Describe actions that will take place during the next year to address obstacles to meeting underserved needs.
4. Identify the federal, state, and local resources expected to be made available to address the needs identified in the plan. Federal resources should include Section 8 funds made available to the jurisdiction, Low-Income Housing Tax Credits, and competitive McKinney-Vento Homeless Assistance Act funds expected to be available to address priority needs and specific objectives identified in the strategic plan.

Program Year 1 Action Plan General Questions response:

### Geographic Priorities

The affordable housing strategies will not be focused on a specific geography. The data shows that the need for affordable housing is spread across the county. One of the main concerns raised in the community meetings was the effect of concentrations of poverty and the location of a large number of subsidized units within one neighborhood. To promote increased housing choice and opportunity, efforts will be made to increase the number of public and assisted housing units located outside areas of minority and low-income concentration.

Homeless and special needs assistance will be directed to agencies located in a wide geographic area. While most homeless resources are centered in the downtown area, efforts will be made to integrate transitional and permanent housing for homeless and special needs populations as widely as possible.

Unlike the other three programs that are limited to Davidson County, HOPWA funds target the needs of the metropolitan area. This includes Cannon, Cheatham, Davidson, Dickson, Hickman, Macon, Robertson, Rutherford, Smith, Sumner, Trousdale, Williamson, and Wilson counties. HOPWA funds will not target any geography specifically, but will serve persons with HIV/AIDS and their families throughout the entire metro area.

The community development strategies will focus on areas with high concentrations of low-income households. This decision is based on the input received in community meetings and the regulatory restrictions that govern the use of CDBG funds. The CDBG regulations limit investment to areas where at least 51% of the households earn less than 80% of the area median income. In an effort to meet the most pressing needs of the community, MDHA will give priority to areas of low-income concentration where at least 65% of the households meet this income threshold. In addition, MDHA will target deteriorating properties that have destabilizing effects on areas immediately surrounding public housing properties.

### Available Resources

On April 1, 2010, MDHA will receive new grant allocations for the CDBG, HOME, ESG, and HOPWA programs. MDHA expects additional CDBG and HOME funds to be available through the receipt of program income generated from previous grant allocations. HUD has yet to release the actual grant amounts for the 2010 program year. The figures below are based the 2009 budget levels and expected program income.

<b>PROGRAM</b>	<b>ESTIMATE</b>
CDBG	
Entitlement	\$5,393,336
Program Income (estimated)	\$471,917
Total	\$5,865,253
HOME	
Entitlement	\$3,263,718
Program Income (estimated)	\$277,416
Total	\$3,541,134
ESG	\$218,915
HOPWA	\$903,441

<b>Other Funding Sources</b>	<b>Amount</b>
Public Housing Capital Funds	\$9,000,000
Section 8	\$35,000,000
McKinney-Vento Homeless Assistance	\$3,500,000
Low-Income Housing Tax Credits	\$0
Weatherization	\$8,100,000
Neighborhood Stabilization Program I	\$4,051,398
Neighborhood Stabilization Program II	\$36,000,000
Homeless Prevention and Rapid Re-Housing (HPRP)	\$2,012,994

## Managing the Process

1. Identify the lead agency, entity, and agencies responsible for administering programs covered by the consolidated plan.
2. Identify the significant aspects of the process by which the plan was developed, and the agencies, groups, organizations, and others who participated in the process.
3. Describe actions that will take place during the next year to enhance coordination between public and private housing, health, and social service agencies.

Program Year 1 Action Plan Managing the Process response:

### Lead Agency

MDHA is the lead agency for the development and administration of the Consolidated Plan. The mission of MDHA is to create affordable housing opportunities for Nashvillians, nurture neighborhoods, and build a greater downtown. Within MDHA, the Development Department is responsible for the Consolidated Plan and its related programs. The Development Department is located at 701 South Sixth Street, Nashville, Tennessee 37206 and can be reached by phone at (615) 252-8503.

## Planning Process

As this is the first annual action plan of the 2010-2015 Consolidated Plan cycle, the annual action plan was developed in conjunction with the Consolidated Plan. The following is a short summary of the process used to outreach to citizens and community development partners. In addition to those listed below, MDHA conducted consultations with community development partners throughout the fall of 2009. For more detail, including a summary of results from each meeting, please refer to the Consolidated Plan.

- In July and August of 2009, MDHA worked with the Civic Design Center to develop and distribute a community needs survey that was sent to over 300 community organizations.
- On August 17<sup>th</sup> 2009, MDHA launched a new webpage dedicated to the development of the Consolidated Plan and established a dedicated email address to accept comments on the plan.
- On August 20<sup>th</sup> and 24<sup>th</sup> 2009, MDHA advertised the upcoming public meetings related to the development of the plan.
- On August 31<sup>st</sup> 2009, MDHA held a community meeting for all parties interested in the Consolidated Plan to provide an overview of the process and to answer questions.
- On September 15<sup>th</sup> 2009, MDHA conducted a focus group on the affordable housing needs of the community.
- On September 16<sup>th</sup> 2009, MDHA conducted a focus group on the non-housing community development needs of the community.
- On September 16<sup>th</sup> 2009, MDHA met with realtors, lenders, fair housing advocates, and representatives from other Metro departments to discuss impediments to fair housing choice and potential fair housing programs.
- On September 17<sup>th</sup> 2009, MDHA met with members of the Continuum of Care to discuss the housing and supportive service needs of the local homeless populations.
- On October 15<sup>th</sup> 2009, MDHA consulted with the Tennessee Lead Elimination Action Program, a program of Middle Tennessee State University to assess lead-based paint hazards. The results from these assessments form a basis for the lead-based paint reduction strategy.
- On October 7<sup>th</sup> 2009, the Development Department consulted with the Asset Management Department of MDHA to discuss the needs of the public housing developments and its residents. In addition, the Development Department reviewed the last two submissions of the PHA plan for consistency with the Consolidated Plan.
- On October 16<sup>th</sup> and 20<sup>th</sup> 2009, MDHA advertised to coming availability of the draft plan and the upcoming public hearing.
- On October 20<sup>th</sup> 2009, MDHA met with Council members to discuss community needs, eligible uses of funds, and proposed strategies.
- On October 21<sup>st</sup> 2009, MDHA provided the draft plan for public comment. MDHA accepted public comments for a thirty day period.
- On November 10<sup>th</sup> 2009, MDHA held a community meeting to present the draft plan to all interested parties, to accept comments on the draft, and to answer questions.
- On December 1<sup>st</sup> 2009, an ordinance to submit the draft plan to HUD was introduced to the Metropolitan Council. The ordinance received final approval on January 20<sup>th</sup> 2010.

## Participants in the Planning Process

Below is a list of organizations who participated in the planning process.

15th Ave. Baptist CDC

Be A Helping Hand

Changed Lives

Affordable Housing  
Resources

Centerstone

Cheatham Place

Community Care Fellowship	Metro Human Relations Commission	Operation Stand Down Nashville
Council on Aging	Metro Legal Department	Park Center
Federal Reserve Bank	Metro Planning	Pinnacle Financial Partners
First Response Center	Metro Police	Ray of Hope
Food Security Partners/Middle TN	Metro Public Health Department	Renewal House
GNAR	Metro Social Services	Reverend Bill Barnes
Historic Buena Vista	Nashville Area Habitat for Humanity	Room in The Inn
Home for Heroes	Nashville Cares	Safe Haven Family Shelter
Homeless Commission	Nashville Civic Design Center	Salvation Army
Hope CDC	Nashville Homeless Power Project	TN Human Rights Commission
Lake Providence Baptist Church	NCDC	TN Lead Elimination Action Program
Legal Aid	Neighborhood Resource Center	TSU
Mary Parrish Center	New Level CDC	The Housing Fund
MDHA Public Housing Staff	The Next Door	TVHS
Mending Hearts	Next Stage Inc	United Way
Mental Health Association	NRO	Urban Housing Solutions
Metro Codes Department		Welcome Home
Metro Homeless Commission		YWCA

### Enhance Coordination

MDHA carries out a portion of the funded projects and relies on a strong network of non-profit partners and other organizations to assist in program delivery. One of the concerns cited during the planning process by some non-profit partners was the lack of consistent communication throughout the entire five-year plan. While MDHA met all of the HUD requirements related to public hearings and publication of annual plans and reports, it was felt that the level of outreach was not effective to garner significant feedback. As a result, MDHA will increase its efforts to market and publicize its plans, reports, and accomplishments. In addition, MDHA has redesigned its Request for Proposal process as part of its new five year Consolidated Plan. The process should encourage greater participation and coordination among agencies.

MDHA will continue to work with key departments of the Metro government to carry out housing and community development strategies. These departments include the Mayor's Office of Neighborhoods, Metro Social Services, Metro Parks, the Planning Commission, Police, Public Works, and Codes.

MDHA will also continue to build its partnerships with agencies outside of Metro. MDHA will work the Tennessee Housing Development Agency (THDA), which administers a home mortgage program and the Low-Income Housing Tax Credits for the State of Tennessee. MDHA will partner with the Greater Nashville Regional Council, which includes representatives from jurisdictions in seven surrounding counties.

MDHA will continue to participate in the Low-Income Housing Forum, the initiatives arising from the Mayor's Task Force to End Chronic Homelessness, the Inter-Departmental Task Force on the Homeless, and other local service delivery and sub area planning processes. MDHA will continue to work on improving coordination and communication among service providers to reduce duplication and deliver services more efficiently.

## Citizen Participation

\*Please note that Citizen Comments and Responses may be included as additional files within the CPMP Tool.

1. Provide a summary of the citizen participation process.
2. Provide a summary of citizen comments or views on the plan.
3. Provide a summary of efforts made to broaden public participation in the development of the consolidated plan, including outreach to minorities and non-English speaking persons, as well as persons with disabilities.
4. Provide a written explanation of comments not accepted and the reasons why these comments were not accepted.

Program Year 1 Action Plan Citizen Participation response:

A description of the citizen participation process and the efforts to broaden public participation is described in the Managing the Process section above. MDHA held four advertised public meetings specifically focused on the Consolidated Plan and made the plan available for public comment. All meetings were advertised in minority newspapers, including El Crucero and Nashville Pride. The meetings were also advertised in the Tennessean . All meetings were held in an ADA-accessible meeting space. A summary of all public comments is included in Appendix B.

## Institutional Structure

1. Describe actions that will take place during the next year to develop institutional structure.

Program Year 1 Action Plan Institutional Structure response:

In 2010, MDHA will introduce a new Planning and Capacity Building component as part of its Neighborhood Improvement Program. Through this program, qualified non-profits will be selected to support individuals and neighborhood organizations interested in applying for the Neighborhood Improvement Program. Residents will receive technical assistance to form or strengthen neighborhood groups, articulate community needs and create applications for the Infrastructure and Enhancement Programs in qualified low-income census tracts and block groups. The planning process will provide close collaboration with Metro departments to ensure that each funded project has a plan and budget for the required on-going operations and maintenance.

There is a need for continued development and capacity building for viable non-profit organizations to carry out housing development activities. MDHA has set aside \$160,000 in 2010 for Community Housing Development Organizations (CHDO) operating subsidies.

## Monitoring

1. Describe actions that will take place during the next year to monitor its housing and community development projects and ensure long-term compliance with program requirements and comprehensive planning requirements.

Program Year 1 Action Plan Monitoring response:

The primary purpose of the monitoring strategy is to guarantee that all projects funded through the Consolidated Plan comply with the applicable federal regulations. Moreover, the monitoring strategy will help MDHA ensure programs and projects are effectively meeting their stated goals and objectives in a timely manner and provide MDHA with a reporting mechanism to communicate performance to community stakeholders and maintain a high level of transparency and accountability for the use of public funds. As part of the monitoring strategy, MDHA will review its policies and procedures from the proposal process to project closeout and long-term affordability monitoring to make necessary updates based on changes to regulatory policy and new federal guidance. Beginning in 2010, MDHA will place a renewed emphasis on the following areas:

- Timely expenditure of funds by subrecipients and developers
- Subsidy layering analysis for all affordable housing projects
- Appropriate level of documentation
- Section 3 compliance

## Lead-based Paint

1. Describe the actions that will take place during the next year to evaluate and reduce the number of housing units containing lead-based paint hazards in order to increase the inventory of lead-safe housing available to extremely low-income, low-income, and moderate-income families, and how the plan for the reduction of lead-based hazards is related to the extent of lead poisoning and hazards.

Program Year 1 Action Plan Lead-based Paint response:

MDHA will ensure that all of its federally-funded housing programs are in full compliance with the lead-based paint hazard regulations (24 CFR Part 35). This includes assisting households with the appropriate lead paint inspection, testing, and abatement of lead-based paint hazards. MDHA also provides education through the distribution of lead paint information and literature. In addition, MDHA will seek greater coordination with the Tennessee Lead Elimination Action Program to leverage additional funds for assessments and abatement.

In April 2010, EPA will extend current requirements regarding lead-safe work practices to cover most pre-1978 housing and require renovation firms to perform quantitative dust testing to achieve dust-lead levels that comply with EPA's regulatory standards. MDHA will work with its contractors, subrecipients and community partners to ensure all funded programs are in full compliance with the updated regulation.

## HOUSING

### Specific Housing Objectives

\*Please also refer to the Housing Needs Table in the Needs.xls workbook.

1. Describe the priorities and specific objectives the jurisdiction hopes to achieve during the next year.
2. Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by this Action Plan.

Program Year 1 Action Plan Specific Objectives response:

In addition to the funded strategies below, HOME funds will be used for the general administration of the program and to provide operating subsidies to qualified non-profit developers (CHDOs) to help expand their capacity to develop affordable housing. For each of the following strategies, MDHA will develop additional criteria to rank how well potential projects meet the critical needs of the community. These critical need factors will be incorporated into the proposal process used to select projects. Critical needs will include factors such as level of affordability, abandonment, foreclosures, and the promotion of mixed-income neighborhoods.

### **Strategy 1.1 Downpayment Assistance**

The Downpayment Assistance program will provide financial assistance and counseling to households purchasing their first home. The goal of the program is to increase the affordability of homeownership for households earning less than 80% of the area median income. Homeownership is the primary asset building tool for most American households. In addition, higher rates of homeownership contribute to greater stability at the neighborhood level. In addition to receiving financial assistance, recipients will be required to complete an educational component to ensure that the purchase is feasible in the long-term and there is low risk of foreclosure.

**2010 Allocation:** \$510,000 HOME

**Annual Goal:** 50 Homebuyers

### **Strategy 1.2 Homeowner Rehabilitation**

The Homeowner Rehabilitation Program will provide financial assistance to existing homeowners to preserve and increase the number of owner-occupied units in standard condition. The program is available to owners earning less than 80% of the area median income. Assistance up to \$36,000 is available in the form of a 3% loan with a ten year term. Eligible costs include labor, materials, supplies and soft costs necessary to bring the unit into compliance with building codes, address lead-based paint hazards, and make energy efficiency improvements. MDHA will coordinate the rehabilitation program with the weatherization program to leverage the effectiveness of both programs.

Elderly households, disabled owners, and owners earning less than 50% of the area median income who can demonstrate financial hardship may qualify for a 0% deferred payment loan due upon sale or transfer of the property. No payments will be made as long as the owner remains in the home. In addition, elderly and disabled households are eligible to make accessibility modifications to allow the homeowner to age in place.

**2010 Allocation:** \$550,800 HOME

**Annual Goal:** 16 Housing Units

### **Strategy 1.3 Homeowner Emergency Rehabilitation**

The Homeowner Emergency Repair program will provide a grant of up to \$10,000 to correct conditions that threaten the health or safety of the occupant. Eligible projects include HVAC, plumbing, roofing, and electrical. Over the course of the five-year plan, it is expected that this program will receive approximately 20% of the CDBG allocation. The five-year goal is to rehabilitate 500 units.

**2010 Allocation:** \$1,258,336 CDBG (Estimated Program Income: \$471,917)

**Annual Goal:** 100 Housing Units

### **Strategy 1.4 Affordable Housing Program**

The Affordable Housing Program will provide financial assistance to qualified developers to increase the affordable housing stock within the community. Types of financing include pre-development loans, construction loans, bridge loans and permanent financing. Eligible costs include acquisition, site preparation, construction, and related soft-costs. Projects may include new construction or acquisition and rehabilitation. Projects may create homeowner or rental units:

- Homeowner projects must serve households at or below 80% of the area median income. Priority will be given to projects that stress quality design and construction to help ensure their long-term contribution to the improvement of the neighborhood. Preference will also be given to projects that incorporate energy efficiency concepts, sustainable building practices, and universal design.
- Rental projects must serve households at or below 60% of the area median income. In projects with five or more assisted units, at least 20% of the units must serve households at or below 50% of the median income. Priority will be given to projects that agree to longer affordability periods, serve a high priority population, including the elderly, disabled, formerly homeless, or households at or below 30% of the are median income.

Developers must be in good standing with MDHA, demonstrate the capacity to comply with all applicable federal regulations, and be able to complete the development in a timely manner. All projects will be reviewed using subsidy layering analysis to determine the minimum amount of investment. Additional funding criteria will examine the ability to address critical needs such as abandonment, foreclosures, and the promotion of mixed-income neighborhoods. A portion of this program budget will be set aside for use by qualified non-profit housing developers (CHDOs). MDHA will accept applications on an on-going basis. Projects will be selected for funding by a review committee at least twice per year.

**2010 Allocation:** \$1,407,600 HOME

(\$489,600 reserved for CHDOs; Estimated Program Income: \$277,416)

**Annual Goal:** 30 Housing Units

### **Strategy 1.5 Rental Rehabilitation**

The Rental Rehabilitation program will provide financial assistance to substandard rental properties to correct code violations. Assistance will be in the form of a 3% loan with a ten-year term. The maximum amount of assistance is \$75,000 per site. The assisted units must serve households at or below 60% of the area median income. In projects with five or more assisted units, at least 20% of the units must serve households at or below 50% of the median income. Rent and income restrictions will remain in effect for a minimum of ten years. Priority will be given to projects that agree to longer affordability periods or serve a high priority population, including the elderly, disabled, formerly homeless, or households at or below 30% of the are median income. Critical need data such as code violations will be used to further prioritize projects. Over the course of the five-year plan, it is expected that this program will receive approximately 10% of the HOME allocation. The five-year goal is to rehabilitate 25 rental units affordable to households earning less than 50% of the median area income.

**2010 Allocation:** \$306,000 HOME

**Annual Goal:** 5 Housing Units

### **Needs of Public Housing**

1. Describe the manner in which the plan of the jurisdiction will help address the needs of public housing and activities it will undertake during the next year to encourage public housing residents to become more involved in management and participate in homeownership.

2. If the public housing agency is designated as "troubled" by HUD or otherwise is performing poorly, the jurisdiction shall describe the manner in which it will provide financial or other assistance in improving its operations to remove such designation during the next year.

Program Year 1 Action Plan Public Housing Strategy response:

MDHA serves as the local public housing agency and is currently designated as a High Performer by HUD for both its Low Rent Housing Program and Section 8 Voucher Program. The agency will continue to implement its current asset management strategy to ensure a high level performance. The current strategy allocates managers and maintenance staff to specific properties. Public housing residents have several opportunities to be involved in management, including two positions on the Board of Commissioners, a resident association at each property, and a Resident Advisory Board. This strategy has proven to be effective as the employees and residents have a sense of ownership in their community. MDHA's public housing strategy is more fully described in its Annual PHA Plan.

Currently, MDHA is able to address the revitalization and restoration needs of its public housing properties through the use of public housing funds. Additional funds available through the Consolidated Plan programs are not needed. Consolidated Plan funds may be used to address blighted homes and commercial buildings located near public housing properties. Public housing staff identified areas adjacent to Vine Hill, Napier Place and Preston Taylor Apartments as negative influences on the living environments of those neighborhoods. Blighted properties within these areas will be targeted for redevelopment.

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

MDHA currently offers the Section 8 Homeownership Program. Since October 2000, more than 140 families have closed on the purchase of a home and are currently receiving homeownership assistance. MDHA will ensure that homeownership programs funded with HOME and CDBG will outreach and coordinate with the public housing program.

The public housing authority has not been designated a "troubled" agency by HUD.

## **Barriers to Affordable Housing**

1. Describe the actions that will take place during the next year to remove barriers to affordable housing.

Program Year 1 Action Plan Barriers to Affordable Housing response:

The consolidated plan must describe the jurisdiction's strategy to remove or ameliorate negative effects of public policies that serve as barriers to affordable housing. A common cost barrier to all housing is the length and complexity of the permitting and review process necessary to ensure the development is safe and meets all code requirements.

In early 2009, Metro made a large step forward in streamlining the development process with the introduction of an online review system. The new process saves time by allowing developers to electronically submit plans online that can be reviewed electronically and concurrently across departments. Overall, the process provides greater interaction and communication and minimizes potential inconsistencies.

MDHA will continue to explore other ways to eliminate and mitigate regulatory barriers, such as the establishment of a local housing trust fund and inclusionary zoning. The idea of a local housing trust fund is to create a permanent and dedicated funding source to assist developers in building affordable housing. The concept of inclusionary zoning is to require a portion of each new housing development

meets affordability standards or to provide benefits, such as density bonuses, to developers who voluntarily meet affordability standards.

### **HOME/ American Dream Down payment Initiative (ADDI)**

1. Describe other forms of investment not described in § 92.205(b).
2. If the participating jurisdiction (PJ) will use HOME or ADDI funds for homebuyers, it must state the guidelines for resale or recapture, as required in § 92.254 of the HOME rule.
3. If the PJ will use HOME funds to refinance existing debt secured by multifamily housing that is that is being rehabilitated with HOME funds, it must state its refinancing guidelines required under § 92.206(b). The guidelines shall describe the conditions under which the PJ will refinance existing debt. At a minimum these guidelines must:
  - a. Demonstrate that rehabilitation is the primary eligible activity and ensure that this requirement is met by establishing a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing.
  - b. Require a review of management practices to demonstrate that disinvestments in the property has not occurred; that the long-term needs of the project can be met; and that the feasibility of serving the targeted population over an extended affordability period can be demonstrated.
  - c. State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.
  - d. Specify the required period of affordability, whether it is the minimum 15 years or longer.
  - e. Specify whether the investment of HOME funds may be jurisdiction-wide or limited to a specific geographic area, such as a neighborhood identified in a neighborhood revitalization strategy under 24 CFR 91.215(e)(2) or a Federally designated Empowerment Zone or Enterprise Community.
  - f. State that HOME funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.
4. If the PJ is going to receive American Dream Down payment Initiative (ADDI) funds, please complete the following narratives:
  - a. Describe the planned use of the ADDI funds.
  - b. Describe the PJ's plan for conducting targeted outreach to residents and tenants of public housing and manufactured housing and to other families assisted by public housing agencies, for the purposes of ensuring that the ADDI funds are used to provide down payment assistance for such residents, tenants, and families.
  - c. Describe the actions to be taken to ensure the suitability of families receiving ADDI funds to undertake and maintain homeownership, such as provision of housing counseling to homebuyers.

Program Year 1 Action Plan HOME/ADDI response:

#### **Forms of Investment**

Not Applicable. MDHA does not plan on utilizing any forms of investment for HOME funds not included in Sec. 92.205(b).

**Resale / Recapture Guidelines**

MDHA has established both resale guidelines and recapture guidelines in order to ensure long-term affordability of HOME-assisted units.

**Recapture Guidelines**

- Either a covenant attached to the land or a deed restriction will be placed on each property at the time of purchase that will establish a defined compliance period based on the amount of assistance. The minimum period of compliance will be five years.
- MDHA may choose to forgive the amount of assistance subject to recapture on a pro-rated basis over the period of compliance.
- During the compliance period, all assisted units are limited to occupancy by households earning less than 80% of the HUD-adjusted area median income.
- During the compliance period, all owner-occupied units must remain the principal residence of the household and may not be rented.

**Resale Guidelines**

- If the property is governed by resale restrictions, the property may only be sold to another income-qualified buyer during the period of compliance. The buyer's monthly mortgage payment may not exceed 30% of their gross income.
- The original compliance period will remain in effect after the property has been transferred. If the new owner receives additional HOME assistance, MDHA will re-calculate the compliance period based on the original amount of HOME assistance and any additional assistance.
- During the compliance period, all owner-occupied units must remain the principal residence of the household and may not be rented.

**Refinancing Guidelines**

Not Applicable. MDHA will not use HOME funds to refinance existing debt secured by multifamily housing that is that is being rehabilitated with HOME funds.

**American Dream Downpayment Initiative (ADDI)**

Not Applicable. MDHA will not receive ADDI funds in 2010.

**HOME Match**

MDHA is required to generate \$0.25 of non-federal matching funds for every dollar of HOME expended. MDHA expects to meet its HOME match requirement through a combination of excess match from prior years and permanent contributions of funds leveraged through the Affordable Housing Program. Under the Affordable Housing Program, MDHA will provide a portion of financing The Affordable Housing Program will subsidize the development of affordable rental and owner-occupied housing by qualified developers. MDHA's investment will make up only a small portion of the total development costs. As part of the subsidy layering analysis, MDHA will identify eligible forms of HOME match committed to the project. Eligible forms of match include but are not limited to:

- Cash or cash equivalents from a non-federal source other than the project owner and developer
- Below-market interest rate loans from private lending institutions
- Value of donated land or real property
- Direct costs of supportive services to residents of HOME projects
- Direct cost of homebuyer counseling to families purchasing homes with HOME assistance
- Value of donated materials, equipment, labor and professional services
- Sweat equity

In addition, MDHA will review each funded project to identify eligible HOME match contributed by MDHA or other Metro departments, including but not limited to:

- Cost of infrastructure improvements associated with HOME projects

- A percentage of the proceeds of single- or multi-family housing bonds issued by state, state instrumentality or local government
- Value of waived taxes, fees or charges associated with HOME projects
- Value of donated land or real property

## HOMELESS

### Specific Homeless Prevention Elements

\*Please also refer to the Homeless Needs Table in the Needs.xls workbook.

1. Sources of Funds—Identify the private and public resources that the jurisdiction expects to receive during the next year to address homeless needs and to prevent homelessness. These include the McKinney-Vento Homeless Assistance Act programs, other special federal, state and local and private funds targeted to homeless individuals and families with children, especially the chronically homeless, the HUD formula programs, and any publicly-owned land or property. Please describe, briefly, the jurisdiction's plan for the investment and use of funds directed toward homelessness.
2. Homelessness—In a narrative, describe how the action plan will address the specific objectives of the Strategic Plan and, ultimately, the priority needs identified. Please also identify potential obstacles to completing these action steps.
3. Chronic homelessness—The jurisdiction must describe the specific planned action steps it will take over the next year aimed at eliminating chronic homelessness by 2012. Again, please identify barriers to achieving this.
4. Homelessness Prevention—The jurisdiction must describe its planned action steps over the next year to address the individual and families with children at imminent risk of becoming homeless.
5. Discharge Coordination Policy—Explain planned activities to implement a cohesive, community-wide Discharge Coordination Policy, and how, in the coming year, the community will move toward such a policy.

Program Year 1 Action Plan Homeless Prevention response:

### Homeless Objectives

In addition to the funded strategies below, a small portion of ESG funds will be used for the general administration of the program. For each of the strategies, MDHA will develop additional criteria to rank how well potential projects meet the critical needs of the community. These critical need factors will be incorporated into the proposal process used to select projects.

### Strategy 2.1 Homeless Prevention

MDHA will coordinate with the Nashville-Davidson County Continuum of Care to provide counseling services and financial assistance to households facing homelessness. MDHA will also work with the Continuum to monitor the success of discharge policies that address the risk of homelessness upon release of public institutions and other facilities. ESG funds will be allocated to qualified non-profit organizations through a competitive proposal process overseen by a Review Committee.

**2010 Allocation:** \$26,000 ESG

**Annual Goal:** 125 Households

### **Strategy 2.2 Emergency Shelter & Transitional Housing**

Emergency shelters and transitional housing form the core of the continuum of the homeless service system. MDHA will continue to provide operational support to emergency shelters and transitional housing facilities to move homeless families and individuals to permanent supportive housing and independent living. In terms of essential services, the Continuum identified an increase of employment as a primary need and set a goal of increasing the percentage of homeless persons employed at exit to at least 19%. MDHA will work with the Continuum to ensure that employment counseling and job training is available to homeless persons.

ESG funds will be allocated to qualified non-profit organizations through a competitive proposal process overseen by a Review Committee. The goal is to provide shelter and services through emergency and transitional shelter network to 2,000 persons on an annual basis.

**2010 Allocation:** \$120,000 ESG

**Annual Goal:** 2,000 persons

### **Strategy 2.3 Permanent Supportive Housing**

One of the Continuum's goals to address chronically homeless persons is the creation of additional permanent supportive housing units. The lack of rental units affordable to households earning less than 30% of the area median income makes it difficult to transition out of the shelter system.

All development and rehabilitation of permanent supportive housing will be addressed through the Affordable Housing program and the Rental Rehabilitation program described above in Strategy 1.4 and 1.5. The Affordable Housing Program will provide financial assistance to qualified developers to increase the supply of affordable rental housing. The Rental Rehabilitation program will provide financial assistance to owners of substandard rental housing to correct code violations. Both of these programs will provide priority to projects that serve homeless families and individuals and households earning less than 30% of median area income. All goals related to the development of housing units are included in the Affordable Housing Objectives.

### **Chronic Homelessness**

HUD defines the chronic homeless population as unaccompanied homeless individuals with a disabling condition, who have either been continuously homeless for a year or more or has at least four episodes in the past three years, and have been sleeping in a place not meant for human habitation and/or in an emergency homeless shelter. The most common disabling conditions are substance abuse and mental illness.

In 2004, Nashville-Davidson County issued a draft "Strategic Framework for Ending Chronic Homelessness in Nashville" that found almost half of the homeless in the area were chronically homeless. The original plan recommended the development of 486 new permanent supportive housing units, the rehabilitation of another 486 units to provide new permanent housing units, and 972 rental subsidies. It was estimated that these 1,946 units would cost approximately \$40 million.

The Key Alliance, a new initiative of the Metropolitan Homelessness Commission, recently set a goal to raise \$71.7 million and develop 1,600 new supportive housing units over the next five years to end chronic homelessness and significantly reduce overall homelessness in Nashville. The initiative will seek participation from all sectors of the community, including public, private, faith-based and nonprofit, to meet these goals.

## **Homeless Prevention**

In addition to the ESG funds provided through Strategy 2.1 listed above, MDHA received a one time grant from HUD through the Homeless Prevention and Rapid Re-housing Program (HPRP). These funds were made available through the American Recovery and Reinvestment Act of 2009. The purpose of the HPRP program is to provide homelessness prevention assistance to households who would otherwise become homeless—many due to the economic crisis—and to provide assistance to rapidly re-house persons who are homeless.

## **Discharge Coordination Policy**

A description of the local discharge policies and their status are provided below:

### **Foster Care Discharge Protocol: Formal Protocol**

Formal protocols are formalized and implemented through the Department of Children's Services. Foster youth are to be referred to Independent Living at age 14, in order to begin planning for the transition out of care. Child and family team meetings are scheduled 6 months before the youth ages out. This has been effective for preventing discharge to the streets. The Jim Casey Youth Opportunities Initiative, launched at Vanderbilt University in 2002 (now called Fostering Success), is working to create better futures for thousands of foster youth in Middle Tennessee who make the transition to adulthood without traditional family supports. Vanderbilt Child and Family Policy Center provides research, evaluation and overall program leadership for Fostering Success. Opportunity Passport is housed at Monroe Harding, a nonprofit agency in Nashville that is home to Youth Connections, a one-stop-shop for transitioning foster youth. This allows young people to secure necessities such as housing, transportation and jobs. The Nashville Career Advancement Center is partner for job training and placement. US Bank helps young people to establish bank accounts. The nonprofit Oasis Center houses the Tennessee Youth Advisory Council. Led by young people, the council addresses the critical issues facing foster care. United Way of Metropolitan Nashville leads the Community Partnership Board, which brings community leaders and resources to address systemic challenges facing foster youth.

### **Health Care Discharge Protocol: Initial Discussion**

Unlike some of the other systems highlighted in this section, very little advance notice is given to the health care system about when patients are expected to exit. Case managers and social workers do their best to assess needs and link to available services in the community. This is mirrored at the private health care providers in Nashville. There have been some initial discussions, but no developments of protocol. Partners involved in the discussion include the Campus for Human Development, Vanderbilt University, Metropolitan General Hospital, the Mayor's Commission to End Chronic Homelessness, and members of the Metropolitan Council.

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

Formal protocols are implemented through the Tennessee Department of Mental Health and Developmental Disabilities. Additionally, the department partners with Centerstone, a multi-county provider of community-based mental health services, by allocating funds to prevent discharge to the shelter or street from Middle Tennessee Mental Health Institute.

### **Corrections Discharge Protocol: Initial Discussion**

The State Department of Corrections is active in facilitating the Tennessee Reentry Collaborative a group that meets 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 the MDHA'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. Monthly meetings of discharge planners are held at the Criminal Justice Center;

partners attending include the Davidson County Sheriff's Office, General Sessions Court, the Metro Public Health Department, the Metro Public Defender's Office, Urban Housing Solutions, Eckman/Freeman Associates and Centerstone, the nation's largest community-based behavioral health provider.

### **ESG Match**

The ESG match requirements will be satisfied through funds leveraged by local non-profit organizations selected to administer ESG-funded activities. Each of the subrecipients who receive ESG funds from MDHA are required to contribute match. Based on applications received in the past, it is expected that subrecipients will contribute an additional \$218,915 of funds that will count toward the ESG match requirement.

## COMMUNITY DEVELOPMENT

### **Community Development**

\*Please also refer to the Community Development Table in the Needs.xls workbook.

1. Identify the jurisdiction's priority non-housing community development needs eligible for assistance by CDBG eligibility category specified in the Community Development Needs Table (formerly Table 2B), public facilities, public improvements, public services and economic development.
2. Identify specific long-term and short-term community development objectives (including economic development activities that create jobs), developed in accordance with the statutory goals described in section 24 CFR 91.1 and the primary objective of the CDBG program to provide decent housing and a suitable living environment and expand economic opportunities, principally for low- and moderate-income persons.

\*Note: Each specific objective developed to address a priority need, must be identified by number and contain proposed accomplishments, the time period (i.e., one, two, three, or more years), and annual program year numeric goals the jurisdiction hopes to achieve in quantitative terms, or in other measurable terms as identified and defined by the jurisdiction.

Program Year 1 Action Plan Community Development response:

MDHA's primary short-term objective is to arrest the decline and stimulate investment in low-income areas through structural improvements, economic development activity, and provision of needed public services. The overall long-term objective is to create viable urban living environments that feature a high quality of life, mixed-income housing, and economic opportunities.

For each of the strategies below, MDHA will develop additional criteria to rank how well potential projects meet the critical needs of the community. These critical need factors will be incorporated into the proposal process used to select projects. CDBG funds will also be used for the general administration of the program and the repayment of a Section 108 Loan that was guaranteed with CDBG funds.

### **Strategy 4.1: Neighborhood Improvement Program**

The Neighborhood Improvement Program will contain three components: Planning and Capacity Building, Infrastructure, and Enhancements. The goal of the program is to provide opportunities for collaboration and expand existing resources for investments that are critical to neighborhood infrastructure and that support neighborhood enhancement. Priority will be given to projects that leverage additional funds to make large capital investments in the neighborhood and that incorporate eco-friendly design elements. Critical need factors for this program will include data such as the percent of low-income households in the target area and amount of leveraged funds.

- The first component, Planning and Capacity Building, will provide resources to non-profits to support individuals and neighborhood organizations interested in the Neighborhood Improvement Program. Residents will receive technical assistance to form or strengthen neighborhood groups, articulate community needs and create applications for the Infrastructure and Enhancement Programs in qualified low-income census tracts and block groups. The planning process will provide close collaboration with Metro departments to ensure that each funded project has a plan and budget for the required on-going operations and maintenance. The Planning component will be administered by qualified subrecipient organizations selected through a competitive RFP.

**2010 Allocation:** \$110,000 CDBG

- The Neighborhood Infrastructure component will fund functional infrastructure improvements and community facilities in qualified low-income census tracts. Potential infrastructure improvements include but are not limited to streets, sidewalks, street lighting, security cameras, water services infrastructure such as storm water, flood and drainage improvements, and acquisition of property for redevelopment. Community facilities include but are not limited to community centers, libraries, youth centers, senior centers, and parks. In order to be eligible for funding, the projects must have a plan and budget endorsed by the Metro department that will be involved with the ongoing maintenance and operation of the project. Operation or maintenance costs are ineligible uses of CDBG funds. Projects involving the acquisition of property must include a disposition or redevelopment strategy for a CDBG eligible activity. Proposed Infrastructure projects will be evaluated by a review committee comprised of MDHA staff and community representatives at least twice per year.

**2010 Allocation:** \$985,500 CDBG

**Annual Goal:** 2 facilities / improvements

- The Neighborhood Enhancement component will fund projects that address a neighborhood's aesthetic needs. Eligible projects under this category include but are not limited to playgrounds, signage, community gardens, traffic mitigation, bus benches and shelters, tree planting, and acquisition of property for redevelopment. All applications funded under this component must have a plan and budget for ongoing maintenance and operations of the project, if applicable. Operation or maintenance costs are ineligible uses of CDBG funds. Projects involving the acquisition of property must include a disposition or redevelopment strategy for a CDBG eligible activity. Proposed Enhancement projects will be evaluated by a review committee comprised of MDHA staff and community representatives at least twice per year.

**2010 Allocation:** \$364,500 CDBG

**Annual Goal:** 3 facilities / improvements

#### **Strategy 4.2: Community Economic Development Program**

The Community Economic Development Program will contain three components: Neighborhood Commercial Improvement, Business Technical Assistance, and Microenterprise Assistance. These programs will foster business development and economic opportunities for low-income residents. Priority will be given to projects that are located in low-income census tracts, increase the level of service to low-income areas, or that create economic opportunities for low-income households. Critical need factors for this program will include data such as unemployment, impact on low-income areas, and amount of leverage. Over the course of the five-year plan, it is expected that this program will receive approximately 8% of available CDBG funds.

- The Neighborhood Commercial Improvement program will provide a range of financing options to businesses located in low-income areas to make façade improvements and to correct code violations to their property. Forms of assistance may include deferred payment loans, low-interest loans, and grants. The terms of the loan will vary based on the amount of assistance. The

maximum loan amount is \$20,000. Grants are available to businesses that can demonstrate a significant level of owner contribution or increased level of service to low-income census tracts. 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 driveway are eligible when the costs of such work is incidental to other rehabilitation of the property. This program will be administered by MDHA and funds will be allocated on a first-come, first-serve basis to qualified projects.

**2010 Allocation:** \$100,000 CDBG

**Annual Goal:** 5 businesses

- The Business Technical Assistance component provides technical and financial assistance to local businesses for the purpose of job creation or retention. Participating businesses will receive technical assistance to develop growth strategies, including but not limited to market studies, marketing assistance, and business plan development. Once the strategy is finalized, the business will be eligible for financial assistance and employment development services to implement the growth strategy. Forms of assistance may include deferred payment loans, low-interest loans, and grants. The terms of the loan will vary based on the amount of assistance. Assisted businesses must create at least one full-time position for each \$35,000 of assistance. At least half of all jobs created must be made available to low-income persons. Employment development services include but are not limited to outreach efforts, screening, referral, training, and placement of applicants for employment opportunities generated by the economic development project. All assistance funded under this category requires an owner contribution to the project and is subject to an additional underwriting review to ensure an adequate public benefit is provided. This program will be administered by a qualified subrecipient organization selected through a competitive RFP. Funds will be allocated on a first-come, first-serve basis to qualified projects.

**2010 Allocation:** \$170,000 CDBG

**Annual Goal:** 5 businesses

- Microenterprise Assistance includes financial assistance, technical assistance, and supportive services to facilitate the creation, stabilization and expansion of microenterprises. Microenterprises are defined as businesses with five or fewer employees, including the owner. Financial assistance may be in the form of a grant or loan. Technical assistance includes workshops, consultations, and advisory services. Supportive services include child care, transportation, counseling, and peer support programs. This program will be administered by a qualified subrecipient organization selected through a competitive RFP. Funds will be allocated on a first-come, first-serve basis to qualified projects.

**2010 Allocation:** \$170,000 CDBG

**Annual Goal:** 5 businesses

### **Strategy 4.3: Community Services Program**

The Community Services Program will provide financial assistance to non-profits and public agencies to fund a new program or a quantifiable increase to an existing program that provides community-based services designed to enhance the quality of life. All eligible programs must satisfy the regulatory requirements of the CDBG program and be designed to primarily serve households earning less than 80% of the area median income.

Priority will be given to elderly, disabled, youth, transportation, employment-related services, and anti-crime programs. Eligible uses include but are not limited to personnel expenses, program supplies, and other operating costs.

The CDBG regulations do not allow communities to spend more than 15% of its allocation on public services. MDHA expects to budget up to the maximum 15% each year and divide funding into two

categories. Eight percent will be reserved for summer youth programs and seven percent will be open to eligible CDBG community service programs. Funds will be awarded to non-profit organizations through an annual competitive Request for Proposals (RFP) and will be evaluated by a review committee comprised of MDHA staff and community representatives. The five-year goal of the program is to serve 6,250 persons.

**2010 Allocation:**           \$447,500 CDBG – Summer Youth  
                                      \$367,500 CDBG – Community Services  
**Annual Goal:**             1,250 persons

## **Antipoverty Strategy**

1. Describe the actions that will take place during the next year to reduce the number of poverty level families.

Program Year 1 Action Plan Antipoverty Strategy response:

MDHA will, to the greatest extent feasible, provide job training, employment, and contract opportunities for public housing residents and other low-income residents in connection with construction projects funded under the Consolidated Plan. This provision helps foster local economic development, neighborhood economic improvement, and individual self-sufficiency. In this way, MDHA will comply with Section 3 of the Housing and Urban Development Act of 1968. It is expected that a number of projects selected for Consolidated Plan funding will focus on assisting households in poverty.

In addition, MDHA will seek to coordinate with the Nashville Alliance for Financial Independence (NAFI) to ensure that working families receive the Earned Income Tax Credit. The Earned Income Tax Credit is the single most effective program to lift families out of poverty. According to NAFI, Davidson County residents did not claim \$20 million in earned income tax credits available to them. MDHA will also explore the use of Individual Development Account (IDA) program.

## NON-HOMELESS SPECIAL NEEDS HOUSING

### Non-homeless Special Needs (91.220 (c) and (e))

\*Please also refer to the Non-homeless Special Needs Table in the Needs.xls workbook.

1. Describe the priorities and specific objectives the jurisdiction hopes to achieve for the period covered by the Action Plan.
2. Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by this Action Plan.

Program Year 1 Action Plan Specific Objectives response:

With the exception of persons with HIV/AIDS, the supportive housing priorities described above will be addressed by affordable housing strategies 1.2 Homeowner Rehabilitation, 1.4 Affordable Housing Program, and 1.5 Rental Rehabilitation. Each of these affordable housing strategies provide extra incentives to persons with special needs. In addition to the funded strategies below, a small portion of HOPWA funds will be used for the general administration of the program.

#### **Strategy 3.1 Housing Assistance for Persons with HIV/AIDS**

HOPWA funds will be used to increase the housing stability for persons living with HIV/AIDS and their families through the provision of financial assistance and related housing services. Over the course of the five-year plan, it is expected that this program will receive approximately 97% of HOPWA allocation. The five year goal is to provide housing and supportive services to 600 households on an annual basis to persons living with HIV/AIDS and their families.

#### **Strategy 3.2 Supportive Housing and Services**

All development and rehabilitation of permanent supportive housing will be addressed through the Affordable Housing program and the Rental Rehabilitation program described above in Strategy 1.4 and 1.5. The Affordable Housing Program will provide financial assistance to qualified developers to increase the supply of affordable rental housing. The Rental Rehabilitation program will provide financial assistance to owners of substandard rental housing to correct code violations. Both of these programs will provide priority to projects that serve households with special needs earning less than 30% of median area income. All goals related to the development of housing units are included in the Affordable Housing Objectives.

### Housing Opportunities for People with AIDS

\*Please also refer to the HOPWA Table in the Needs.xls workbook.

1. Provide a Brief description of the organization, the area of service, the name of the program contacts, and a broad overview of the range/ type of housing activities to be done during the next year.
2. Report on the actions taken during the year that addressed the special needs of persons who are not homeless but require supportive housing, and assistance for persons who are homeless.
3. Evaluate the progress in meeting its specific objective of providing affordable housing, including a comparison of actual outputs and outcomes to proposed goals and progress made on the other planned actions indicated in the strategic and action plans. The evaluation can address any related program adjustments or future plans.

4. Report on annual HOPWA output goals for the number of households assisted during the year in: (1) short-term rent, mortgage and utility payments to avoid homelessness; (2) rental assistance programs; and (3) in housing facilities, such as community residences and SRO dwellings, where funds are used to develop and/or operate these facilities. Include any assessment of client outcomes for achieving housing stability, reduced risks of homelessness and improved access to care.
5. Report on the use of committed leveraging from other public and private resources that helped to address needs identified in the plan.
6. Provide an analysis of the extent to which HOPWA funds were distributed among different categories of housing needs consistent with the geographic distribution plans identified in its approved Consolidated Plan.
7. Describe any barriers (including non-regulatory) encountered, actions in response to barriers, and recommendations for program improvement.
8. Please describe the expected trends facing the community in meeting the needs of persons living with HIV/AIDS and provide additional information regarding the administration of services to people with HIV/AIDS.
9. Please note any evaluations, studies or other assessments that will be conducted on the local HOPWA program during the next year.

Program Year 1 Action Plan HOPWA response:

MDHA is designated as the lead agency for the administration of HOPWA funds within the Eligible Metropolitan Statistical Area (EMSA). The EMSA includes the following counties in Middle Tennessee: Davidson, Wilson, Williamson, Rutherford, Cheatham, Dickson, Sumner, Robertson, Cannon, Hickman, Macon, Smith and Trousdale.

MDHA will allocate funds among services providers based on the recommendations of a review committee. MDHA will allocate funds (estimate of allocation) for the following eligible uses:

- \$455,500 will be used for services such as case management, subsidies for front-end housing costs such as rent and utility deposits, food/nutrition assistance, and transportation programs;
- \$357,850 will be used to provide short-term and tenant-based rent payments; and
- \$63,000 will be used for administrative services.

## **Specific HOPWA Objectives**

Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by the Action Plan.

Program Year 1 Specific HOPWA Objectives response:

### **Strategy 3.1 Housing Assistance for Persons with HIV/AIDS**

HOPWA funds will be used to increase the housing stability for persons living with HIV/AIDS and their families through the provision of financial assistance and related housing services. Over the course of the five-year plan, it is expected that this program will receive approximately 97% of HOPWA allocation. The five year goal is to provide housing and supportive services to 600 households on an annual basis to persons living with HIV/AIDS and their families.

## Other Narrative

Include any Action Plan information that was not covered by a narrative in any other section.

Program Year 1 Other Narrative response:

Appendix A: Required HUD Tables

Appendix B: Summary of Public Comments

Appendix C: SF-424 & Certifications

HUD Table 3A: Summary of Specific Objectives

Specific Objectives		Fund		Performance Indicators	Year	Goal	Actual	Outcome & Objective
<b>1.0 Housing</b>								
1.1	Create new homeownership opportunities for existing renter households with down payment assistance loans to first time homebuyers.	HOME	\$510,000	Housing Units	2010	50		Increased Affordability of Decent Housing
					2011			
					2012			
					2013			
					2014			
					TOTAL	50		
1.2	Provide financial assistance to existing homeowners to preserve and improve the existing supply of owner-occupied units through rehabilitation and accessibility modifications.	HOME	\$550,800	Housing Units	2010	16		Increased Affordability of Decent Housing
					2011			
					2012			
					2013			
					2014			
					TOTAL	16		
1.3	Provide financial assistance to existing homeowners to address emergency conditions that pose a threat to the occupant's health of safety.	CDBG Est. Prg Income	\$1,258,336 \$471,917	Housing Units	2010	100		Increased Affordability of Decent Housing
					2011			
					2012			
					2013			
					2014			
					TOTAL	100		
1.4	Provide gap financing to qualified developers to increase the supply of affordable housing units through new construction and acquisition and rehabilitation of properties.	HOME Est. Prg Income	\$1,407,600 \$277,416	Housing Units	2010	30		Increased Affordability of Decent Housing
					2011			
					2012			
					2013			
					2014			
					TOTAL	30		
1.5	Provide financial assistance to existing rental property owners to address code violations through the rehabilitation of units affordable to households earning less than 60% of the area median income.	HOME	\$306,000	Housing Units	2010	5		Increased Affordability of Decent Housing
					2011			
					2012			
					2013			
					2014			
					TOTAL	5		

HUD Table 3A: Summary of Specific Objectives

Specific Objectives	Fund	Performance Indicators	Year	Goal	Actual	Outcome & Objective
<b>2.0 Homeless</b>						
2.1 Provide financial and counseling assistance to prevent homelessness among at-risk households.	ESG	\$26,000	Households Assisted	2010	125	Increased Availability of Suitable Living Environment
				2011		
				2012		
				2013		
				2014		
				TOTAL	125	
2.2 Provide support to the network of emergency shelter, transitional shelter, and homeless service providers with the overall goal of graduating homeless individuals and families into permanent housing situations.	ESG	\$120,000	Persons	2010	2000	Increased Availability of Suitable Living Environment
				2011		
				2012		
				2013		
				2014		
				TOTAL	2000	
2.3 Provide gap financing to qualified developers to increase the supply of permanent supportive housing for homeless individuals.	Goals and projects for this strategy are included in the overall affordable housing goals listed above.				Increased Availability of Suitable Living Environment	
<b>3.0 Supportive Housing &amp; Services</b>						
3.1 Provide financial and counseling assistance to improve the affordability and availability of housing for persons with HIV/AIDS and their families.	HOPWA	\$813,350	Household Assisted	2010	600	Increased Affordability of Decent Housing
				2011		
				2012		
				2013		
				2014		
				TOTAL	2000	
3.2 Provide gap financing to qualified developers to increase the supply of permanent supportive housing for persons with special needs.	Goals and projects for this strategy are included in the overall affordable housing goals listed above.				Increased Affordability of Decent Housing	

HUD Table 3A: Summary of Specific Objectives

Specific Objectives		Fund	Performance Indicators	Year	Goal	Actual	Outcome & Objective
<b>4.0 Community Development</b>							
4.1	The Neighborhood Improvement Program will provide a coordinated and collaborative approach to infrastructure improvements in low-income neighborhoods to increase the area's sustainability and the quality of life.	CDBG	\$1,459,500	Facilities	2010	5	Increased Sustainability of Suitable Living Environment
					2011		
					2012		
					2013		
					2014		
					TOTAL	5	
4.2	The Community Economic Development Program will provide expanded economic opportunities for local businesses and low-income residents through the provision of financial, technical and employment development assistance to for-profit companies.	CDBG	\$440,000	Businesses Assisted	2010	8	Increased Availability of Economic Opportunities
					2011		
					2012		
					2013		
					2014		
					TOTAL	8	
4.3	The Community-based Services Program will fund new and quantifiable increases to existing social and community-based services to enhance the quality of life among low- and moderate-income persons within the community.	CDBG	\$815,000	Persons	2010	1250	Increased Availability of Suitable Living Environment
					2011		
					2012		
					2013		
					2014		
					TOTAL	1250	

**Table 3B**  
**ANNUAL AFFORDABLE HOUSING COMPLETION GOALS**

Grantee Name: Nashville-Davidson County, TN Program Year: 2010	Expected Annual Number of Units To Be Completed	Actual Annual Number of Units Completed	Resources used during the period			
			CDBG	HOME	ESG	HOPWA
<b>BENEFICIARY GOALS</b> (Sec. 215 Only)						
Homeless households			<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Non-homeless households			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Special needs households			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Total Sec. 215 Beneficiaries*</b>			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>RENTAL GOALS</b> (Sec. 215 Only)						
Acquisition of existing units			<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
Production of new units	30		<input type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>
Rehabilitation of existing units	5		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Rental Assistance			<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
<b>Total Sec. 215 Affordable Rental</b>	35		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>HOME OWNER GOALS</b> (Sec. 215 Only)						
Acquisition of existing units			<input type="checkbox"/>	<input type="checkbox"/>		
Production of new units			<input type="checkbox"/>	<input type="checkbox"/>		
Rehabilitation of existing units	116		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		
Homebuyer Assistance	50		<input type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>
<b>Total Sec. 215 Affordable Owner</b>	166		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>COMBINED RENTAL AND OWNER GOALS (Sec. 215 Only)</b>						
Acquisition of existing units			<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
Production of new units	30		<input type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>
Rehabilitation of existing units	121		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Rental Assistance			<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
Homebuyer Assistance	50		<input type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>
<b>Combined Total Sec. 215 Goals*</b>	201		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>OVERALL HOUSING GOALS</b> (Sec. 215 + Other Affordable Housing)						
Annual Rental Housing Goal	35		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Annual Owner Housing Goal	166		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Total Overall Housing Goal</b>	201		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

\* The total amounts for "Combined Total Sec. 215 Goals" and "Total Sec. 215 Beneficiary Goals" should be the same number.

**Table 3C**  
**Consolidated Plan Listing of Projects**  
**Nashville-Davidson County, Tennessee**

**Priority Need**

Housing

**Project Title**

Downpayment Assistance

**Description**

The Downpayment Assistance program will provide financial assistance and counseling to households purchasing their first home. The goal of the program is to increase the affordability of homeownership for households earning less than 80% of the area median income. Homeownership is the primary asset building tool for most American households. In addition, higher rates of homeownership contribute to greater stability at the neighborhood level. In addition to receiving financial assistance, recipients will be required to complete an educational component to ensure that the purchase is feasible in the long-term and there is low risk of foreclosure.

**Objective category:**     Suitable Living Environment     Decent Housing     Economic Opportunity

**Outcome category:**     Availability/Accessibility     Affordability     Sustainability

**Location/Target Area**

Scattered sites throughout county

Objective Number 1.1	Project ID 1
HUD Matrix Code 13 Direct Homeownership Assistance (N/A)	
Type of Recipient Subrecipient	CDBG National Objective N/A (N/A)
Start Date (mm/dd/yyyy) April 1 <sup>st</sup> , 2010	Completion Date (mm/dd/yyyy) March 31 <sup>st</sup> , 2011
Performance Indicator Housing Units	Annual Units 50
Local ID 1	Units Upon Completion

**Funding Sources:**

CDBG	\$
ESG	\$
HOME	<b>\$510,000</b>
HOPWA	\$
Total Formula	
Prior Year Funds	
Assisted Housing	
PHA	
Other Funding	\$
<b>Total</b>	<b>\$510,000</b>

The primary purpose of the project is to help:     the Homeless     Persons with HIV/AIDS     Persons with Disabilities     Public Housing Needs

**Table 3C**  
**Consolidated Plan Listing of Projects**  
**Nashville-Davidson County, Tennessee**

**Priority Need**

Housing

**Project Title**

Homeowner Rehabilitation

**Description**

The Homeowner Rehabilitation Program will provide financial assistance to existing homeowners to preserve and increase the number of owner-occupied units in standard condition. The program is available to owners earning less than 80% of the area median income. Assistance, up to \$36,000, is available in the form of a 3% loan with a ten year term. Eligible costs include labor, materials, supplies and soft costs necessary to bring the unit into compliance with building codes, address lead-based paint hazards, and make energy efficiency improvements.

**Objective category:**     Suitable Living Environment     Decent Housing     Economic Opportunity  
**Outcome category:**     Availability/Accessibility     Affordability     Sustainability

**Location/Target Area**

Scattered sites throughout county

Objective Number 1.2	Project ID 2
HUD Matrix Code 14A Rehab; Single-Unit Residential (N/A)	
Type of Recipient Grantee	CDBG National Objective N/A (N/A)
Start Date (mm/dd/yyyy) April 1 <sup>st</sup> , 2010	Completion Date (mm/dd/yyyy) March 31 <sup>st</sup> , 2011
Performance Indicator Housing Units	Annual Units 16
Local ID 2	Units Upon Completion

**Funding Sources:**

CDBG	\$
ESG	\$
HOME	\$550,800
HOPWA	\$
Total Formula	
Prior Year Funds	
Assisted Housing	
PHA	
Other Funding	\$
Total	\$550,800

The primary purpose of the project is to help:  the Homeless  Persons with HIV/AIDS  Persons with Disabilities  Public Housing Needs

**Table 3C**  
**Consolidated Plan Listing of Projects**  
**Nashville-Davidson County, Tennessee**

**Priority Need**

Housing

**Project Title**

Homeowner Emergency Rehabilitation

**Description**

The Homeowner Emergency Repair program will provide a grant of up to \$10,000 to correct conditions that threaten the health or safety of the occupant. Eligible projects include HVAC, plumbing, roofing, and electrical.

**Objective category:**  Suitable Living Environment  Decent Housing  Economic Opportunity  
**Outcome category:**  Availability/Accessibility  Affordability  Sustainability

**Location/Target Area**

Scattered sites throughout county

Objective Number 1.3	Project ID 3
HUD Matrix Code 14A Rehab; Single-Unit Residential (570.202)	
Type of Recipient Grantee	CDBG National Objective Low/Mod Housing (570.208(a)(3))
Start Date (mm/dd/yyyy) April 1 <sup>st</sup> , 2010	Completion Date (mm/dd/yyyy) March 31 <sup>st</sup> , 2011
Performance Indicator Housing Units	Annual Units 100
Local ID 3	Units Upon Completion

**Funding Sources:**

CDBG	\$1,258,336
ESG	\$
HOME	\$
HOPWA	\$
Total Formula	
Prior Year Funds	
Assisted Housing	
PHA	
Other Funding-est. program income	\$471,917
Total	\$1,730,253

The primary purpose of the project is to help:  the Homeless  Persons with HIV/AIDS  Persons with Disabilities  Public Housing Needs

**Table 3C**  
**Consolidated Plan Listing of Projects**  
**Nashville-Davidson County, Tennessee**

**Priority Need**

Housing

**Project Title**

Affordable Housing Program

**Description**

The Affordable Housing Program will provide financial assistance to qualified developers to increase the affordable housing stock within the community. Types of financing include pre-development loans, construction loans, bridge loans and permanent financing. Eligible costs include acquisition, site preparation, construction, and related soft-costs. Projects may include new construction or acquisition and rehabilitation.

**Objective category:**     Suitable Living Environment     Decent Housing     Economic Opportunity  
**Outcome category:**     Availability/Accessibility     Affordability     Sustainability

**Location/Target Area**

To Be Determined

Objective Number 1.4	Project ID 4
HUD Matrix Code 12 Construction of Housing (N/A)	
Type of Recipient Subrecipient	CDBG National Objective N/A (N/A)
Start Date (mm/dd/yyyy) April 1 <sup>st</sup> , 2010	Completion Date (mm/dd/yyyy) March 31 <sup>st</sup> , 2011
Performance Indicator Housing Units	Annual Units 30
Local ID 4	Units Upon Completion

**Funding Sources:**

CDBG	\$
ESG	\$
HOME	\$1,407,600
HOPWA	\$
Total Formula	
Prior Year Funds	
Assisted Housing	
PHA	
Other Funding-est. program income	\$277,416
<b>Total</b>	<b>\$1,685,016</b>

The primary purpose of the project is to help:     the Homeless     Persons with HIV/AIDS     Persons with Disabilities     Public Housing Needs

**Table 3C**  
**Consolidated Plan Listing of Projects**  
**Nashville-Davidson County, Tennessee**

**Priority Need**

Housing

**Project Title**

Rental Rehabilitation

**Description**

The Rental Rehabilitation program will provide financial assistance to substandard rental properties to correct code violations. Assistance will be in the form of a 3% loan with a ten-year term. The maximum amount of assistance is \$75,000 per site. The assisted units serve households at or below 60% of the area median income. In projects with five or more assisted units, at least 20% of the units must serve households at or below 50% of the median income. Rent and income restrictions will remain in effect for a minimum of ten years. Priority will be given to projects that agree to longer affordability periods or serve a high priority population, including the elderly, disabled, formerly homeless, or households at or below 30% of the are median income.

**Objective category:**  Suitable Living Environment  Decent Housing  Economic Opportunity

**Outcome category:**  Availability/Accessibility  Affordability  Sustainability

**Location/Target Area**

Scattered sites throughout county

Objective Number 1.5	Project ID 5
HUD Matrix Code 14B Rehab; Multi-Unit Residential (N/A)	
Type of Recipient Grantee	CDBG National Objective N/A (N/A)
Start Date (mm/dd/yyyy) April 1 <sup>st</sup> , 2010	Completion Date (mm/dd/yyyy) March 31 <sup>st</sup> , 2011
Performance Indicator Housing Units	Annual Units 5
Local ID 5	Units Upon Completion

**Funding Sources:**

CDBG	\$
ESG	\$
HOME	<b>\$306,000</b>
HOPWA	\$
Total Formula	
Prior Year Funds	
Assisted Housing	
PHA	
Other Funding	\$
Total	<b>\$306,000</b>

The primary purpose of the project is to help:  the Homeless  Persons with HIV/AIDS  Persons with Disabilities  Public Housing Needs

**Table 3C**  
**Consolidated Plan Listing of Projects**  
**Nashville-Davidson County, Tennessee**

**Priority Need**

Homeless

**Project Title**

Homeless Prevention

**Description**

MDHA will coordinate with the Nashville-Davidson County Continuum of Care to provide counseling services and financial assistance to households facing homelessness. MDHA will also work with the Continuum to monitor the success of discharge policies that address the risk of homelessness upon release of public institutions and other facilities.

**Objective category:**     Suitable Living Environment     Decent Housing     Economic Opportunity  
**Outcome category:**     Availability/Accessibility     Affordability     Sustainability

**Location/Target Area**

Services will be provided at non-profit service providers throughout the county.

Objective Number 2.1	Project ID 6
HUD Matrix Code 05Q Subsistence Payments (N/A)	
Type of Recipient Subrecipient	CDBG National Objective N/A (N/A)
Start Date (mm/dd/yyyy) April 1 <sup>st</sup> , 2010	Completion Date (mm/dd/yyyy) March 31 <sup>st</sup> , 2011
Performance Indicator Households	Annual Units 125
Local ID 6	Units Upon Completion

**Funding Sources:**

CDBG	\$
ESG	\$ 26,000
HOME	\$
HOPWA	\$
Total Formula	
Prior Year Funds	
Assisted Housing	
PHA	
Other Funding	\$
<b>Total</b>	<b>\$ 26,000</b>

The primary purpose of the project is to help:     the Homeless     Persons with HIV/AIDS     Persons with Disabilities     Public Housing Needs

**Table 3C**  
**Consolidated Plan Listing of Projects**  
**Nashville-Davidson County, Tennessee**

**Priority Need**

Homeless

**Project Title**

Emergency Shelter & Transitional Housing

**Description**

MDHA will continue to provide operational support to emergency shelters and transitional housing facilities to move homeless families and individuals to permanent supportive housing and independent living. This program will provide grants to qualified non-profit organizations through a competitive proposal process overseen by a Review Committee.

**Objective category:**     Suitable Living Environment     Decent Housing     Economic Opportunity  
**Outcome category:**     Availability/Accessibility     Affordability     Sustainability

**Location/Target Area**

Shelters throughout the county

Objective Number 2.2	Project ID 7
HUD Matrix Code 03T Operating Costs of Homeless/AIDS Patients Programs (N/A)	
Type of Recipient Subrecipient	CDBG National Objective N/A (N/A)
Start Date (mm/dd/yyyy) April 1 <sup>st</sup> , 2010	Completion Date (mm/dd/yyyy) March 31 <sup>st</sup> , 2011
Performance Indicator People	Annual Units 2000
Local ID 7	Units Upon Completion

**Funding Sources:**

CDBG	\$
ESG	<b>\$120,000</b>
HOME	\$
HOPWA	\$
Total Formula	
Prior Year Funds	
Assisted Housing	
PHA	
Other Funding	\$
<b>Total</b>	<b>\$120,000</b>

The primary purpose of the project is to help:  the Homeless     Persons with HIV/AIDS     Persons with Disabilities     Public Housing Needs

**Table 3C**  
**Consolidated Plan Listing of Projects**  
**Nashville-Davidson County, Tennessee**

**Priority Need**

HIV/AIDS

**Project Title**

Housing Assistance for Persons with HIV/AIDS

**Description**

HOPWA funds will be used to increase the housing stability for persons living with HIV/AIDS and their families through the provision of financial assistance and related housing services. \$246,000 will be used for Rental Assistance, \$485,400 will be used for Supportive Services, and \$39,750 will be used for Administrative Services.

**Objective category:**     Suitable Living Environment     Decent Housing     Economic Opportunity  
**Outcome category:**     Availability/Accessibility     Affordability     Sustainability

**Location/Target Area**

Community Wide

Objective Number 3.1	Project ID 8
HUD Matrix Code 31 HOPWA (N/A)	
Type of Recipient Subrecipient	CDBG National Objective N/A (N/A)
Start Date (mm/dd/yyyy) April 1 <sup>st</sup> , 2010	Completion Date (mm/dd/yyyy) March 31 <sup>st</sup> , 2011
Performance Indicator Households	Annual Units 600
Local ID 8	Units Upon Completion

**Funding Sources:**

CDBG	\$
ESG	\$
HOME	\$
HOPWA	<b>\$813,350</b>
Total Formula	
Prior Year Funds	
Assisted Housing	
PHA	
Other Funding	\$
<b>Total</b>	<b>\$813,350</b>

The primary purpose of the project is to help:     the Homeless     Persons with HIV/AIDS     Persons with Disabilities     Public Housing Needs



**Table 3C**  
**Consolidated Plan Listing of Projects**  
**Nashville-Davidson County, Tennessee**

**Priority Need**

Economic Development

**Project Title**

Community Economic Development Program

**Description**

The Community Economic Development Program will contain three components, Neighborhood Commercial Improvement, Business Technical Assistance, and Microenterprise Assistance, to foster business development and economic opportunities for low-income residents. Priority will be given to projects that are located in low-income census tracts, increase the level of service to low-income areas, or that create economic opportunities for low-income households. The programs will use the following eligibility and national objective citations:

- Neighborhood Commercial Improvement: 14E Commercial Rehabilitation and Low-Mod Area (LMA)
- Business Technical Assistance: 18A & 18B For-Profit Financial and Technical Assistance and Low-Mod Jobs (LMJ)
- Microenterprise Assistance: 18C Microenterprise Assistance and Limited Clientele (LMC)

**Objective category:**     Suitable Living Environment     Decent Housing     Economic Opportunity

**Outcome category:**     Availability/Accessibility     Affordability     Sustainability

**Location/Target Area**

Community Wide

Objective Number 4.2	Project ID 10
HUD Matrix Code See Description Above	
Type of Recipient Subrecipient	CDBG National Objective See Description Above
Start Date (mm/dd/yyyy) April 1 <sup>st</sup> , 2010	Completion Date (mm/dd/yyyy) March 31 <sup>st</sup> , 2011
Performance Indicator Businesses	Annual Units 8
Local ID 10	Units Upon Completion

**Funding Sources:**

CDBG	\$440,000
ESG	\$
HOME	\$
HOPWA	\$
Total Formula	
Prior Year Funds	
Assisted Housing	
PHA	
Other Funding	\$
<b>Total</b>	<b>\$440,000</b>

The primary purpose of the project is to help:     the Homeless     Persons with HIV/AIDS     Persons with Disabilities     Public Housing Needs

**Table 3C**  
**Consolidated Plan Listing of Projects**  
**Nashville-Davidson County, Tennessee**

**Priority Need**

Public Services

**Project Title**

Community-based Services Program

**Description**

The Community-based Service Program will provide financial assistance to non-profits and public agencies to fund a new program or a quantifiable increase to an existing program that provides community-based services designed to enhance the quality of life. All eligible programs must satisfy the regulatory requirements of the CDBG program and be designed to primarily serve households earning less than 80% of the area median income.

**Objective category:**     Suitable Living Environment     Decent Housing     Economic Opportunity  
**Outcome category:**     Availability/Accessibility     Affordability     Sustainability

**Location/Target Area**

To Be Determined

Objective Number 4.3	Project ID 11
HUD Matrix Code 05 Public Services (General) (570.201(e))	
Type of Recipient Subrecipient	CDBG National Objective Low/Mod Clientele (570.208(a)(2))
Start Date (mm/dd/yyyy) April 1 <sup>st</sup> , 2010	Completion Date (mm/dd/yyyy) March 31 <sup>st</sup> , 2011
Performance Indicator People	Annual Units 1250
Local ID 11	Units Upon Completion

**Funding Sources:**

CDBG	<u>\$815,000</u>
ESG	<u>\$</u>
HOME	<u>\$</u>
HOPWA	<u>\$</u>
Total Formula	<u>                    </u>
Prior Year Funds	<u>                    </u>
Assisted Housing	<u>                    </u>
PHA	<u>                    </u>
Other Funding	<u>\$</u>
<b>Total</b>	<u><b>\$815,000</b></u>

The primary purpose of the project is to help:     the Homeless     Persons with HIV/AIDS     Persons with Disabilities     Public Housing Needs



**Table 3C**  
**Consolidated Plan Listing of Projects**  
**Nashville-Davidson County, Tennessee**

**Priority Need**

Planning & Administration

**Project Title**

CDBG Planning

**Description**

CDBG funds will be used to conduct planning activities, including the 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. Funds may also be used under this category for activities designed to improve the capacity to manage CDBG-funded programs and activities.

**Objective category:**  Suitable Living Environment  Decent Housing  Economic Opportunity  
**Outcome category:**  Availability/Accessibility  Affordability  Sustainability

**Location/Target Area**

Not Applicable

Objective Number 5.1	Project ID 13
HUD Matrix Code 20 Planning (570.205)	
Type of Recipient Grantee	CDBG National Objective N/A (N/A)
Start Date (mm/dd/yyyy) April 1 <sup>st</sup> , 2010	Completion Date (mm/dd/yyyy) March 31 <sup>st</sup> , 2011
Performance Indicator Not Applicable	Annual Units N/A
Local ID 13	Units Upon Completion

**Funding Sources:**

CDBG	<u>\$485,000</u>
ESG	<u>\$</u>
HOME	<u>\$</u>
HOPWA	<u>\$</u>
Total Formula	<u>                    </u>
Prior Year Funds	<u>                    </u>
Assisted Housing	<u>                    </u>
PHA	<u>                    </u>
Other Funding	<u>\$</u>
Total	<u>\$485,000</u>

The primary purpose of the project is to help:  the Homeless  Persons with HIV/AIDS  Persons with Disabilities  Public Housing Needs

**Table 3C**  
**Consolidated Plan Listing of Projects**  
**Nashville-Davidson County, Tennessee**

**Priority Need**

Planning & Administration

**Project Title**

HOME Administration

**Description**

HOME funds will be used to provide grant compliance and oversight of other HOME-funded programs. Program administration costs include staff and related costs required for overall program management, coordination, monitoring, reporting, and evaluation.

**Objective category:**  Suitable Living Environment  Decent Housing  Economic Opportunity

**Outcome category:**  Availability/Accessibility  Affordability  Sustainability

**Location/Target Area**

Not Applicable

Objective Number 5.2	Project ID 14
HUD Matrix Code 21H HOME Admin/Planning Costs of PJ (N/A)	
Type of Recipient Grantee	CDBG National Objective N/A (N/A)
Start Date (mm/dd/yyyy) April 1 <sup>st</sup> , 2010	Completion Date (mm/dd/yyyy) March 31 <sup>st</sup> , 2011
Performance Indicator Not Applicable	Annual Units N/A
Local ID 14	Units Upon Completion

**Funding Sources:**

CDBG	\$
ESG	\$
HOME	<b>\$326,118</b>
HOPWA	\$
Total Formula	
Prior Year Funds	
Assisted Housing	
PHA	
Other Funding	\$
<b>Total</b>	<b>\$326,118</b>

The primary purpose of the project is to help:  the Homeless  Persons with HIV/AIDS  Persons with Disabilities  Public Housing Needs

**Table 3C**  
**Consolidated Plan Listing of Projects**  
**Nashville-Davidson County, Tennessee**

**Priority Need**

Planning & Administration

**Project Title**

ESG Administration

**Description**

ESG funds will be used to provide grant compliance and oversight of other ESG-funded programs. Program administration costs include staff and related costs required for overall program management, coordination, monitoring, reporting, and evaluation.

**Objective category:**  Suitable Living Environment  Decent Housing  Economic Opportunity

**Outcome category:**  Availability/Accessibility  Affordability  Sustainability

**Location/Target Area**

Not Applicable

Objective Number 5.3	Project ID 15
HUD Matrix Code 21A General Program Administration (N/A)	
Type of Recipient Grantee	CDBG National Objective N/A (N/A)
Start Date (mm/dd/yyyy) April 1 <sup>st</sup> , 2010	Completion Date (mm/dd/yyyy) March 31 <sup>st</sup> , 2011
Performance Indicator Not Applicable	Annual Units N/A
Local ID 15	Units Upon Completion

**Funding Sources:**

CDBG	\$
ESG	\$ 10,915
HOME	\$
HOPWA	\$
Total Formula	
Prior Year Funds	
Assisted Housing	
PHA	
Other Funding	\$
Total	\$ 10,915

The primary purpose of the project is to help:  the Homeless  Persons with HIV/AIDS  Persons with Disabilities  Public Housing Needs

**Table 3C**  
**Consolidated Plan Listing of Projects**  
**Nashville-Davidson County, Tennessee**

**Priority Need**

Planning & Administration

**Project Title**

HOPWA Administration

**Description**

HOPWA funds will be used to provide grant compliance and oversight of other HOPWA-funded programs. Program administration costs include staff and related costs required for overall program management, coordination, monitoring, reporting, and evaluation.

**Objective category:**  Suitable Living Environment  Decent Housing  Economic Opportunity

**Outcome category:**  Availability/Accessibility  Affordability  Sustainability

**Location/Target Area**

Not Applicable

Objective Number 5.4	Project ID 16
HUD Matrix Code 31 HOPWA	
Type of Recipient Grantee	CDBG National Objective N/A (N/A)
Start Date (mm/dd/yyyy) April 1 <sup>st</sup> , 2010	Completion Date (mm/dd/yyyy) March 31 <sup>st</sup> , 2011
Performance Indicator Not Applicable	Annual Units N/A
Local ID 16	Units Upon Completion

**Funding Sources:**

CDBG	\$
ESG	\$
HOME	\$
HOPWA	\$ 27,091
Total Formula	
Prior Year Funds	
Assisted Housing	
PHA	
Other Funding	\$
Total	\$ 27,091

The primary purpose of the project is to help:  the Homeless  Persons with HIV/AIDS  Persons with Disabilities  Public Housing Needs

**Table 3C**  
**Consolidated Plan Listing of Projects**  
**Nashville-Davidson County, Tennessee**

**Priority Need**

Housing

**Project Title**

CHDO Operating Costs

**Description**

HOME funds will be used to provide non-profit developers acting as Community Housing Development Organizations (CHDOs) with operating subsidies. Eligible costs include reasonable and necessary costs for operations, including salaries, wages, and benefits, employee education, training, and travel, rent, utilities, communication costs, insurance, equipment, materials and supplies.

**Objective category:**  Suitable Living Environment  Decent Housing  Economic Opportunity  
**Outcome category:**  Availability/Accessibility  Affordability  Sustainability

**Location/Target Area**

Not Applicable

Objective Number 5.2	Project ID 17
HUD Matrix Code 21I HOME CHDO Operating Expenses (N/A)	
Type of Recipient Community Housing Development Organization	CDBG National Objective N/A (N/A)
Start Date (mm/dd/yyyy) April 1 <sup>st</sup> , 2010	Completion Date (mm/dd/yyyy) March 31 <sup>st</sup> , 2011
Performance Indicator Organizations	Annual Units 2
Local ID 17	Units Upon Completion

**Funding Sources:**

CDBG	\$
ESG	\$
HOME	<b>\$163,200</b>
HOPWA	\$
Total Formula	
Prior Year Funds	
Assisted Housing	
PHA	
Other Funding	\$
<b>Total</b>	<b>\$163,200</b>

The primary purpose of the project is to help:  the Homeless  Persons with HIV/AIDS  Persons with Disabilities  Public Housing Needs

**Table 3C**  
**Consolidated Plan Listing of Projects**  
**Nashville-Davidson County, Tennessee**

**Priority Need**

Other

**Project Title**

Section 108 Loan Repayment

**Description**

CDBG funds will be used to make principal and interest payments on a Section 108 loan.

**Objective category:**  Suitable Living Environment  Decent Housing  Economic Opportunity

**Outcome category:**  Availability/Accessibility  Affordability  Sustainability

**Location/Target Area**

Not Applicable

Objective Number 5.3	Project ID 18
HUD Matrix Code 19F Planned Repayment of Section 108 Loan Principal (N/A)	
Type of Recipient Grantee	CDBG National Objective N/A (N/A)
Start Date (mm/dd/yyyy) April 1 <sup>st</sup> , 2010	Completion Date (mm/dd/yyyy) March 31 <sup>st</sup> , 2011
Performance Indicator Not Applicable	Annual Units N/A
Local ID 18	Units Upon Completion

**Funding Sources:**

CDBG	\$445,000
ESG	\$
HOME	\$
HOPWA	\$
Total Formula	
Prior Year Funds	
Assisted Housing	
PHA	
Other Funding	\$
Total	\$445,000

The primary purpose of the project is to help:  the Homeless  Persons with HIV/AIDS  Persons with Disabilities  Public Housing Needs

# **Appendix B**

## **Comments Received**

## Public Comments Received and Responses

- I just want to express my thanks for the outreach to the community. The meeting last night was very positive and is moving in the right direction. Thanks for the opportunity to be a part of the planning process.
- Several staff at the Planning Department have reviewed and discussed the Draft 2010-2015 Five-Year Consolidated Plan and we have a handful of comments. Our main comment is that we are impressed with the document and found that the issues we thought of regarding the use of federal funds for affordable housing and community economic development were addressed by it.
- We did especially agree with the focuses on geographic dispersion, the balancing of neighborhood revitalization with housing affordability preservation strategies, and inclusionary zoning. We thought if there were any opportunity to increase or flesh out those references, it would be worthwhile since they are so important.
- One thing we wondered about was the exclusion of information about specific Neighborhood Strategy Areas. We thought we remembered their being included in past Consolidated Plans and wondered a) what the reason was for the omission and b) if it would be possible to include the information. We are interested, in upcoming planning processes such as for North Nashville, in helping to effectively concentrate and coordinate public investments and would find this information helpful.
- We would like to thank you and the MDHA staff and your consultant for the excellent work you have done and for giving us the opportunity to comment.
- I am happy to see that there will be actions to “improve the local institutional structure and coordination among local agencies.” I would like to know more about what those actions will be.
- I am happy to hear that “efforts will be made to increase the number of public and assisted housing units located outside areas of minority and low-income concentration.” I would like to know more about the plan to make this happen.
- This is a good list of key findings!
- For Affordable Housing, I would like to suggest that priority/preference also be given to developers that meet with the community to share their proposed project, receive and incorporate feedback and get a letter of approval from the neighborhood group, Council Member, etc.

- For Community Development Priority Needs and Objectives, “There is a need for greater coordination between neighborhood residents, community stakeholders, and government departments to develop collaborative and comprehensive solutions to the needs of low-income neighborhoods.” AMEN—I couldn’t have said it better myself!
- Regarding the Neighborhood Improvement Program, I couldn’t be more excited about the well-thought out components of the Neighborhood Improvement Program! This appears to deal with a lot of the past problems faced by NSAs and remove a lot of the headaches for MDHA. Very well-done!
- Regarding the Community Services Program, I love this, too!
- Regarding the Anti-Poverty Strategy, it would be helpful to know more details about how this provision is met. When there are phrases like “to the greatest extent feasible”, it makes me wonder how that is measured. Happy to see NAFI mentioned here. That’s great!
- Regarding the Coordination Strategy, it would be helpful to know the details of MDHA’s plans to market and publicize its work.
- How does MDHA define capacity building? MDHA RESPONSE: Capacity Building is described in more detail as part of Strategy 4.1 Neighborhood Improvement on page 13. Capacity building will be provided to potential and existing neighborhood organizations interested in applying for Neighborhood Improvement Program funds.
- Will there be a competitive grant process for nonprofits and or neighborhood organizations to use with established criteria and scoring mechanisms to submit proposals for this activity? Yes - MDHA will have written program guidelines on how the programs will be implemented, including evaluation criteria. Once the plan is approved, MDHA will begin creating program guidelines well before the April 1 start date.
- Will proposals be accepted by the agency on an ongoing basis and if so will criteria for proposals be published? See above. Each program will have written guidelines available to all interested parties.
- What agencies currently administer the program or are sub-recipients? The Housing Fund currently administers MDHA’s downpayment assistance program.
- What is the maximum amount of assistance that a 1, 2, or 3 person household can receive? The current program has limits of \$10,000, deferred payment loan.
- Is the assistance a grant, a loan or are both offered? The current program provides loans.
- For program year 2010, \$1,380,000 is allocated for affordable housing programs. Are there projects that are approved and currently active? No - The funds described in the plan are not available to MDHA until April 1, 2010. The funds have not been allocated to any specific project.

- If so what are they and what is the funding allocation? What % of the projects will be rental projects and what % will be homeownership? The Consolidated Plan considers both rental projects and homeownership projects to be a high priority. Specific amounts or percentages for owner housing and rental housing will depend on type of applications received.
- The plan states that it is necessary to prioritize the use of funds available to the highest and best use and toward meeting the most pressing needs. Please consider providing more monies for affordable rental housing, even if it is in the form of rental subsidies which is an eligible expense under HUD regulations. I would recommend 5 year goals of at least 400 rental units and 450 homeownership units. More people will become financially stable, have discretionary income to establish emergency savings resulting in less reliance on high cost short term loans and to save for homeownership. MDHA Response: The Consolidated Plan considers both rental projects and homeownership projects to be a high priority. As such, programs have been developed to fund both rental and owner housing projects. The largest housing program, the Affordable Housing Program, will accept proposals for rental housing.
- The plan initiatives will include efforts to improve the local institutional and coordination among local agencies. I did not see in the plan much specificity about how this would be done and what specific objective or outcome measurements were. Please provide more detail. MDHA Response: The Consolidated plan does provide initiatives to improve efforts to improve the local institutional and coordination among local agencies. This is primarily achieved through the program design of each strategy, such as the Neighborhood Improvement Program which is focused on fostering greater coordination with Metro departments and neighborhoods. Specific objective or outcome measurements are tied to each program receiving funds.
- Under 1.4 and 2.3 the plan indicates that gap financing will be provided to developers to increase supply of affordable housing units and permanent supportive housing for homeless families. Tennessee has no operating housing trust fund other than the limited THDA fund. Nashville has no housing trust fund. High financing costs are one of the barriers to developers. What viable leveraging sources has the agency identified other than LITC to provide other sources of grants or low cost debt? MDHA Response: A limited number of projects may be viable with only one subsidy source. But typical projects involve multiple subsidies from various sources. Gap financing is the principal method of financing affordable housing projects across the country, especially with the HOME Program. The HOME Program requires that a subsidy layering analysis is done for each development to ensure the project is not overly subsidized. It is expected other sources of financing to include conventional financing from lenders, owner equity, Low-Income Housing Tax Credits, HUD programs such as SHP, 202, 811, and 203k, Federal Home Loan Bank funds, THDA, among others.
- Has a model applicable to this market been developed to demonstrate the effectiveness of this approach? MDHA Response: As stated above, this model is required under the HOME Program and is one of the most common approach to affordable housing finance.
- Will the agency consider allowing CHDO proceeds from the sale of homes to stay with non-profits each time a home is completed to help build capacity as opposed to providing low or

no interest loans? MDHA Response: Yes - once the plan is approved, MDHA will develop program guidelines that will clearly state how proceeds from CHDO developments will be permitted.

- Geographic Priorities states that efforts will be made to increase the number of public and assisted housing units located outside areas of minority and low-income concentration. What are some of specific examples of what the agency plans to do to achieve this goal? MDHA Response: Once the plan is approved, MDHA will develop program guidelines that will incorporate elements such as geographic priority. One example is the HUD requirement for Site and Neighborhood Standards for HOME rental projects. More information on this can be found at [www.hud.gov](http://www.hud.gov).
- Costs to develop affordable housing that blends architecturally within higher income areas frequently present barriers to creating more affordable homes especially for households whose income falls below 50% of AMI. What solutions will the agency provide to overcome this obstacle particularly for homeownership projects? MDHA Response: The Affordable Housing program will provide funds to both rental projects and homeownership projects, which are high priorities. Obstacles related to the design and architecture are out of the purview of funding proposals as they often relate to existing planning and zoning requirements.
- The plan states that, “Over the course of the five year plan it is expected that will receive approximately 45% of the HOME allocation”. Please clarify what “this program” means. What will the other 55% of HOME dollars (I assume) will be allocated for? MDHA Response: The referenced program refers to Strategy 1.4 Affordable Housing Program. The description of the Affordable Housing Program begins on Page 7. The entire HOME budget is included on Page 3 of the Executive Summary.
- Several areas reference “review committees”. Who typically sits on a review committee for the agency? MDHA Response: Review committees will include MDHA staff members as well as community members who have experience in type of project reviewed. For example, the Affordable Housing Review Committee could include local builders, lenders, and realtors.
- What is the 5 year goal for the agency to remove or ameliorate negative effects of public policies that serve as barriers to affordable housing? What are the measurable outcomes? MDHA Response: The review of regulatory barriers to affordable housing is an administrative function and as such no numerical goals have been set. MDHA will continue to explore ways to eliminate and mitigate regulatory barriers. The Five Year Consolidated Plan is specially focused on strategies to meet affordable housing and development needs through specific programs funded by HUD. As such the numerical goals and outcomes are based on funding for specific programs.
- How will homeownership programs funded with HOME and CDBG coordinate with the public housing program? MDHA Response: MDHA staff will ensure that public housing residents, especially those who are participating in the Section 8 Homeownership Programs,

are aware of the assistance available through the Consolidated Plan. This will be handled through close coordination with public housing staff at MDHA.

- How is the home buyer education component provided and what is the process for interested, qualified agencies to submit proposals to provide this? MDHA Response: MDHA will have written program guidelines on how the programs will be implemented, including evaluation criteria. Once the plan is approved, MDHA will begin creating program guidelines well before the April 1 start date.
- What homeownership activities will be funded with CDBG dollars other than infrastructure? MDHA Response: CDBG funds are tied to programs for homeowner emergency rehabilitation, the Neighborhood Improvement Program (infrastructure), the Community Economic Development Program (economic development), and the Community Services Program (public services). Community Services Program, will also contain options for homeownership counseling as eligible under the CDBG Regulations for public service.
- IDA financial education with matching savings programs across the country are successful tools to help individuals save for continuing their education, purchasing a reliable automobile to get to work or save for purchasing a home. This program can increase both the homeownership and economic development outcomes for MDHA. Using CDBG funds is an allowable match for the federal grant through the Department of Health and Human Services. Consumers we work with would be more likely to reach financial stability sooner and have the means to help themselves achieve their asset building goals. Please consider this activity. MDHA Response: Depending on the use of the IDA funds (i.e. starting a business, buying a home, employment training), this type of program may be eligible to apply for Community Services Program funds.
- What process and procedures will the agency use to publicize its plans, reports and accomplishments? MDHA Response: MDHA will continue to publish its Consolidated Plan, Action Plan, and Annual Reports as well as hold public meetings for input.
- Follow the model of other PJs working to demonstrate transparency. Place enough details on what projects are being done, who is receiving funding to do what, what process is used to publicize funding availability, the criteria for consideration of proposals and how the projects align with the priorities of consolidated plan. Include all activities that MDHA directly uses funding for such as infrastructure for Rolling Hill Mill, streetscape projects, parks, community centers etc. MDHA Response: This Five Year Consolidated Plan restructures all community development and housing programs to achieve increased transparency. Information related to programs, guidelines, and funded projects will be made available.
- I am just an Edgefield neighbor and interested in helping with the walkability and safety of Main Street. It is very close to downtown and to several neighborhoods as it heads towards Gallatin Road. I am very glad for your help in this pursuit and will be happy to learn of your suggestions for more input from our neighborhood. Many thanks for all your time.
- It troubles me that street outreach (an activity that has been funded through ESG since before the millennium) did not even get mentioned. In other communities that have effective

responses to homelessness, expansive and coordinated street outreach programs are the centerpiece to reducing homelessness. If you are confident that you are at least covering large portions of the city through outreach, you can then empower the outreach workers with transitional and permanent housing options that they can offer their clients. We are currently missing many people because we are not expanding access points. If we wait for people to come through the doors of our existing COC providers, I am afraid we will not reduce the number of individuals experiencing homelessness in our community. I probably should wait until 11/10 to make my comments (and I may come and repeat them) but I am not confident that they will be truly heard. I respect you guys and know there are a lot of people and pressures and priorities and whatnot to respond to, it just seems like we continue to do the same thing year after year expecting something different. More dramatically, I was hoping for some fresh air from this plan but I'm only smelling something stale. MDHA Response: We did not deliberately kept street outreach out of the plan. ESG and HOPWA are fairly consistent in HUD program language - the processes outlined in the plan are standard in preparing RFPs and funds to service providers - as you noted street outreach has been funded through ESG and nothing in this plan changes that. I respectfully disagree with your characterization of plan as stale - we went out of our way to include housing and services to homeless more explicitly than every before. The Affordable housing sections call out housing for the homeless as a priority and the CDBG community services, which list homeless prevention as a possibility, is new! Please keep in mind that this plan encompasses many facets of community development, not just one population.

- Commenter feels that the plan is an opportunity to make real change and that the regulatory barriers to affordable housing section should include inclusionary zoning and a local housing trust fund.
- Commenter feels that project with high potential impact such as a local housing trust fund or inclusionary zoning should be included in the Executive Summary of the plan and that these items should be stressed to the City Council.
- Question: What does low-income area refer to? How is that defined? MDHA Response: These areas are defined by HUD according to US Census data and are areas where at least 51% of the households who live in the area are considered to be low or moderate income (households earning less than 80% of the area median income).
- Question: In section 4.1 under expected results on Infrastructure goals, it lists 10 projects. Is that per year or over the five year period? MDHA Response: The five year goal is to fund and complete 10 infrastructure projects.
- Question: In section 2.2 serving 2,000 people or moving 2,000 people out into permanent supportive housing. MDHA Response: The plan refers to providing service to 2,000 people, not moving 2,000 people into supportive housing.
- Question: Emergency Rehab, what is income threshold? MDHA Response: 80% of median income.

- Question: Stallman building had some affordable units, but the rents did not sound affordable. MDHA Response: The Stallman Building used Tax Increment Financing. While some of those units were considered affordable, they did not necessarily follow the HUD income and rent guidelines. The HOME programs will have to comply with both rent and income guidelines published by HUD.
- Question: Will the streets and sidewalks have to be located in those low mod areas? How will we determine if a neighborhood qualifies? MDHA Response: The plan does have a map but it may be difficult to see if your specific neighborhood qualifies. MDHA will publish a list of census tracts that are eligible on the website and provide information on how to determine if your neighborhood qualifies.
- Question: In terms of next steps, if my neighborhood wants to submit an application for funds, how would I do that? MDHA Response: Program guidelines should be available in the spring and we will have meetings with the public to talk about the programs. Applications will become available April 1. You will have two or three months to submit the application before they are reviewed.
- Given number of homeless, on ESG grant amount is roughly \$200,000. Is there a chance the ESG amount can go up? MDHA Response: That amount is based on Congressional budgets and can go up and down based on what Congress decides. In addition, homeless programs will be eligible for Community Services Programs.
- Please explain how this money overlaps with the money that the Metro Homeless Commission. They are not part of this? MDHA Response: While the funding sources are different, many of the goals and strategies are the same. MDHA did consult with the Homeless Commission to make sure the Con Plan is aligned with their 10 Year Plan to End Homelessness.
- Comment: Are you aware of the lack of housing for homeless in Nashville? There are all sorts of available buildings. What about Section 8? They just look at you and laugh (if you're homeless). MDHA Response: Yes, and some of these programs are geared toward the development of housing that will serve persons at or below 30% of median income.
- One comment and one question. Administrative activities were listed several different times. Why is it in four different places? MDHA Response: Each program has a different administrative cap which is prescribed by HUD so it appears for each program. For CDBG, the cap includes administrative staff costs, plus planning costs, legal fees, and advertising fees.
- Comment: It would be nice if the plan could set aside or award points for certain projects or communities to make sure the funds are going to the areas that are most in need. You say you really want to have projects for low income areas, there should be ways to give points for non-profits who deploys people who build houses, or hire women who would be homeless, or ex-offenders. MDHA Response: That's a good point. You'll see mention of "critical needs" in the document that will be used to incorporate some of that into the RFP process. However, at this point we won't have all the details until the program guidelines are written in the

spring. There has also been talk of developing a Housing Policy and Research Center. If that happens, we would love to work with them and use their data to further define needs and target funds.

- First question is process-related. You talk about having a competitive process for the Neighborhood Improvement Program. Is that new that neighborhoods apply for that? MDHA Response: Yes, and we did that for a few different reasons. What we wanted to do was address some of the obstacles at the very beginning. Instead of going into a community that qualifies and setting aside funds and taking them through the process, we wanted to switch gears and have community groups get help preparing an application and coordinate with Metro departments. The NIP will be a way to better coordinate with Metro and get a better bang for our buck.
- Comment: The old way always seemed to be a mystery as to how the funds were allocated. This way seems more transparent.
- Question: Relates to earlier comment, you may want to try to concentrate some of your efforts into a targeted geographic effect so that the gross effect is greater. The question is how do you concentrate it so you can look at it after five years and say wow. On the other side, there is concern for concentrating low income housing into one area. How will the program guidelines address this? MDHA Response: The plan does address geographic priority roughly along the lines of the comments. There will be a challenge in incorporating these into the program guidelines.
- I like the direction that the NIP program is headed. It needed change. Challenge going forward is to not forget geographic impact and focus that a number of these programs when used in conjunction can bring to bear on the issue. I also like the focus on job creation. I think there needs to be workforce training in the economic development component. I think it would be good to give it a priority under Community Services.
- I agree with giving priorities for PSH for special needs. I disagree with giving priority for permanent supportive housing for homeless under the Affordable Housing Program. I think they should compete on equal footing. There are other funding sources available for homeless, but few sources available for housing at 50-80%.
- Outside of CHDOS, there is not a lot in the plan for the 50 to 80%. That was one of the issues that we discussed in the focus group meeting. I would be concerned that it is an underserved segment. We need to continue to pay attention to that section.
- If all the RFPs come out at the same time, this will be difficult for people submitting applications and may affect the quality of the applications.
- The homeless end up costing the community so much money through the hospital and the legal system. They say the second biggest homeless shelter is the jail and the next biggest is the hospital. Some of these individuals are costing us a lot of money.

- On 2.3 Supportive Housing Priorities it discusses serving people leaving correctional facilities, but there is not a strategy that speaks directly to that. MDHA Response: This population will be included in the general permanent supportive housing strategy, which will be funded through the Affordable Housing Program and the Rental Rehabilitation program.
- Question: What type of services are typically provided as part of the Emergency and Transitional Shelter Strategy? MDHA Response: This will include street outreach, case management to help people access main stream programs. Typically funds will be used to pay a salary of a person to provide thee services.
- Comment: The shelter curfews prevent residents from working certain jobs that have night hours, limit job opportunities.
- There is a need for seminars from people like Rusty Lawrence to get non-profits to do projects. Need more outreach to rehab buildings. They do not have good plans or a solid basis. Need technical assistance. MDHA Response: There is a group that is evaluating the COC process. We will look forward to incorporating those recommendations into this plan.
- You should look for a holistic point of view for these dollars. Think of it as seed money. How can you change people's mindsets? Maybe the first step is to get them into housing.
- There are several services and housing located in my neighborhood. They are already concentrated in this neighborhood and my concern is that it will continue to be concentrated and will grow into a container for these type of services.
- In the discussion about ex-offenders, can you define related services? I feel that this needs to be more defined. MDHA Response: One of the biggest hurdles we heard in the focus groups was that in addition to housing, people leaving correctional facilities need job training and employment services. Other services could include case management and counseling.
- I believe that the MHA could assist and support the consolidated plan by providing conflict resolution. There are two mediators on staff. MHA could offer courses on conflict resolution and we could serve as mediators when there is a conflict. Whether there is a conflict between the tenant and a spouse, neighbor, or landlord, many tenants lack the skills to resolve conflicts in a healthy manner. While it may be a lack of tact, there may also be mental illness or substance abuse that leads to emotional outbursts or avoidance. By teaching conflict resolution and serving a mediators, the MHA could help retain tenants, prevent homelessness, and save landlords the costs involved in flipping the property (i.e., prepare the apt for the next tenant, search for the next tenant, etc.).