

METROPOLITAN NASHVILLE-DAVIDSON COUNTY, TENNESSEE

**SUBSTANTIAL AMENDMENT 1
TO THE
2018-2023 CONSOLIDATED
PLAN
FOR
HOUSING AND COMMUNITY
DEVELOPMENT
AND
2019-2020 ANNUAL UPDATE
FOR
PROGRAM YEAR TWO
For the period June 1, 2019 – May 31, 2020**

Prepared by:

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On Behalf of:

The Metropolitan Government of
Nashville and Davidson County
Updated May 28, 2019



Substantial Amendment 1 to the 2018-2023 Consolidated Plan

And

The 2019-2020 Annual Update to the 2018-2023 Consolidated Plan

(2019 Action Plan) Program Year Two

Executive Summary **ES1**

Action Plan **AP1**

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Executive Summary

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

1. Introduction

Metropolitan Nashville-Davidson County is an entitlement community eligible to receive direct assistance under the U.S. Department of Housing and Urban Development's (HUD's) Community Development Block Grant (CDBG) program; is a participating jurisdiction under the HOME Investment Partnerships Program (HOME); and is a formula grantee under the Emergency Solutions Grant (ESG) and the Housing Opportunities for Persons with AIDS (HOPWA) program. Every five years, Metro Nashville prepares a Consolidated Plan to describe how these funds will be used to address housing and community development needs. CDBG, HOME, and ESG must be expended within Nashville-Davidson County for participants who meet applicable eligibility criteria and for eligible activities as outlined by program regulations and each year's Action Plan. HOPWA funds target the needs of persons living with HIV/AIDS and their families in the Nashville-Davidson—Murfreesboro-Franklin Metropolitan Statistical Area (MSA). All programs must benefit low income persons or households ($\leq 80\%$ of the area median income) or low income areas.

The Metropolitan Development and Housing Agency (MDHA) is designated as the lead agency for the development and administration of the Consolidated Plan and its related programs. Within MDHA, these functions are undertaken by the Community Development Department. To ensure the Consolidated Plan reflects the City's priorities, aligns with its initiatives, and incorporates local plans and reports, MDHA collaborated with several Metro agencies throughout the planning process for the development of the 2018 – 2023 Consolidated Plan (Plan).

The current Five Year Plan covers the period June 1, 2018 through May 31, 2023. The Plan is updated each year (Annual Update) to reflect proposed activities and goals for the program year (Action Plan). Annual Updates/Action Plans serve as Nashville's application for federal funds each year. This is the Program Year (PY) 2 (2019) Action Plan for the period June 1, 2019 through May 31, 2020. Concurrent with this Action Plan, MDHA has prepared Substantial Amendment 1 to the Consolidated Plan to provide the following:

- Allow 2019 HOPWA funds to be used for tenant based rental assistance (TBRA) and emergency hotel/motel assistance; and

- Add language to the description section of the Strategic Plan (SP) 25 Priority Need #3 – Retain Affordable Housing Stock, of the Consolidated Plan to clarify that the amount of CDBG funds to be allocated to this Priority Need will be a least 50% of the annual allocation after deductions for the 20% allocation for Administrative Activities and 15% for Public Service Activities.

MDHA received notification from HUD on April 25, 2019 of the 2019 formula grant allocations and the information in this Action Plan has been updated based on the actual dollar amounts to be received. In addition, approximately \$250,000 in CDBG program income is expected to be received during the 2019 PY and approximately \$342,000 in HOME program income is expected to be available to allocate to projects during the 2019 PY. Therefore, anticipated resources are as follows:

PROGRAM YEAR (PY) 2 ANTICIPATED RESOURCES			
Grant	2019 Annual Allocation	Estimated Program Income	Total
CDBG	\$ 5,112,559.00	\$ 250,000.00	\$ 5,362,559.00
ESG	\$ 432,358.00	\$ 0.00	\$ 432,358.00
HOME	\$ 2,330,266.00	\$ 342,000.00	\$ 2,672,266.00
HOPWA	\$ 1,373,743.00	\$ 0.00	\$ 1,373,743.00
TOTAL	\$ 9,248,926.00	\$ 592,000.00	\$ 9,840,926.00

The Annual Update is due to HUD forty-five (45) days prior to the beginning of the PY, which for Metro Nashville, is no later than April 14 of each year. However, per HUD direction in CPD Notice 19-01 (See Exhibit 1), MDHA could not submit the Action Plan for HUD approval until actual allocations for 2019 were released. These allocations were released on April 25, 2019 and the budgets for CDBG and HOME project activities have been updated based on the percentages used to calculate the activity budgets published in the draft Action Plan that was released on April 11, 2019 at the start of the public comment period. The final allocations for 2019 ESG and HOPWA activities – other than those directly undertaken by MDHA staff – will be determined via the Request for Application (RFA) process and demand for funding for projects, subject to regulatory caps.

2. Summary of the objectives and outcomes identified in the Plan

The priorities of the 2018-2023 Consolidated Plan were established after significant planning and public input and correlate to addressing impediments identified in the 2017 Fair Housing Analysis.

Priorities of the Plan are to:

1. Increase the number of decent, safe affordable units and help low and moderate income households access affordable housing.
2. Preserve existing affordable housing units and help low and moderate income households retain housing.
3. Support facilities and services for the homeless and persons with HIV/AIDS.
4. Create pathways to self-sufficiency for low and moderate income persons and families.
5. Revitalize distressed neighborhoods and underserved areas.
6. Undertake grant management, planning, and other eligible administrative tasks under CDBG, HOME, ESG, and HOPWA.

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

The table below summarizes the proposed activities funded during the 2019 PY to address Consolidated Plan priorities.

Priority 1	Increase the number of decent, safe affordable units and help LMI households access affordable housing.
Activity	New Construction
HOME	New Construction - Rental
HOME	New Construction – Owner
HOME	New Nonprofit Partner Set-aside
Activity	Address Housing Barriers
CDBG	Fair Housing Activities
Priority 2	Preserve existing affordable housing units and help LMI tenants and homeowners retain housing.

Activity	Retain affordable housing stock
CDBG	Targeted Homeowner Rehabilitation (Napier-Sudekum Choice Neighborhoods Planning Area)
CDBG	Homeowner Rehabilitation (Housing Target Areas)
CDBG	Weatherization Assistance (Countywide)
CDBG	Accessibility Rehabilitation
CDBG	HVAC Replacement (Countywide)
CDBG	Roof Replacement
CDBG	Housing Services/Delivery

Priority 3	Support facilities and services for the homeless and persons with HIV/AIDS
Activity	Assist Homeless Persons and Persons with HIV/AIDS
CDBG	Services for the Homeless
ESG	Information System
ESG	Rapid Re-housing
ESG	Prevention
ESG	Shelter Operations/Essential Services
ESG	Outreach
HOPWA	Sponsor Administration.
HOPWA	Short Term Rent, Mortgage, and Utilities
HOPWA	Facility-Based Rental Housing Assistance
HOPWA	Tenant-Based Rental Assistance
HOPWA	Emergency Hotel/Motel Stay Assistance
HOPWA	Supportive Services - Permanent Housing Placement
Priority 4	Create pathways to self-sufficiency for LMI persons and families.
Activity	Create economic opportunities for LMI persons
CDBG	Employment Services (Section 3 Opportunities)
Activity	Support Youth Programs
CDBG	Summer Youth Programs
CDBG	Youth Employment Programs
Priority 5	Revitalize distressed neighborhoods and underserved areas.
Activity	Invest in Underserved Areas
CDBG	Public Facilities/Improvements
Priority 6	Undertake grant management, planning, and other eligible administrative tasks authorized under CDBG, HOME, ESG, and HOPWA.
Activity	Provide oversight and management of grants.

CDBG	Administration and Planning
HOME	Administration
ESG	Administration
HOPWA	Administration

3. Evaluation of past performance

Each year, MDHA reports its progress in meeting the five-year and annual goals in the Consolidated Annual Performance and Evaluation Report (CAPER). This report is required to be submitted to HUD within 90 days after the PY ends. Previous years' CAPERs are available on MDHA's website: <http://www.nashville-mdha.org/?p=1857>. MDHA has consistently satisfied program mandates and has successfully targeted funds to benefit low- and moderate-income persons and neighborhoods. In its most recent letter approving the 2017 CAPER, HUD determined that our overall progress is excellent and that activities appear to be in accordance with program requirements.

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

4. Summary of citizen participation process and consultation process

To ensure the 2019 Action Plan truly addresses the needs in Metro Nashville, the citizen participation and consultation processes were designed to garner considerable public input on the development of the Action Plan, as well as on the Draft. Throughout the 2018 program year, MDHA staff consulted with stakeholders, non-profits, project sponsors, and the Mayor's office for suggestions to improve or expand programs for PY 2019. Additional input on the development of the draft Plan was obtained through an online stakeholder/community survey sent to over 400 agencies, non-profits, community groups and organizations and posted on the MDHA website from November 15 – December 21, 2018. The survey generated 55 responses. Additionally, MDHA met with local stakeholders for further discussions regarding homelessness and HOPWA needs. Comments on the draft Action Plan were obtained during the 30-day public comment period (April 11 through May 15, 2019) and at the

public hearing that was held on April 23, 2019. Details about the public hearing and how the public can submit comments are provided in the Public Notice (Appendix E).

Information on how persons with disabilities or sensory impairments or in need of translation services can request accommodation is provided in all Public Notices, in emails advertising community meetings/public input sessions, and posted on the Consolidated Plan webpage in Spanish, Chinese, Vietnamese, Arabic, and Somali. MDHA will make every effort to accommodate reasonable requests if they are made not later than five (5) business days prior to any meeting. Public Notices are translated to Spanish.

Following the conclusion of the Public Comment Period, the 2019 Action Plan will be presented to the MDHA Board of Commissioners and the Metropolitan Council for approval, prior to its submittal to HUD.

5. Summary of public comments

A summary of public comments received during from the online community survey conducted between November 15, 2018 and December 21, 2018 is provided in Appendix C.

A summary of public comments on the draft 2019-2020 Action Plan received at the public hearing held on April 23, 2019 is provided in Appendix F.

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

A summary of public comments or views received during any public hearing that were not accepted and the reasons for not accepting them is included in summary of public comments (Appendix F).

7. Summary

Nashville is a growing city – between 2000 and 2016, the population of Davidson County grew by 17%, from 569,891 to 667,885. With its popularity has come immense pressure on the housing market, with cost burden being the most common housing problem experienced by Nashvillians of all income ranges. This problem is particularly acute for households with income less than 50% of the area median income (AMI). Further, Nashville's growth has not occurred equally across the county – the landscape of some neighborhoods has been changed dramatically by new development and the loss of affordable housing, while investment and new development have yet to make it to other areas. The goals and priorities of the Consolidated Plan seek to create new affordable housing, especially for households with incomes \leq 60% AMI and provide incentives for this development in areas of opportunity; to preserve existing affordable housing to stabilize the fabric of existing neighborhoods and allow homeowners to age in their homes; and to bring new investment to underserved areas.

PR-05 Lead & Responsible Agencies 24 CFR 91.200(b)

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

MDHA is responsible for preparing the Consolidated Plan and the administration of each grant program and funding source.

Agency Role	Name	Department/Agency
CDBG Administrator	NASHVILLE-DAVIDSON	MDHA Community Development Department
HOPWA Administrator	NASHVILLE-DAVIDSON	MDHA Community Development Department
HOME Administrator	NASHVILLE-DAVIDSON	MDHA Community Development Department
ESG Administrator	NASHVILLE-DAVIDSON	MDHA Community Development Department

Table 1 – Responsible Agencies

Narrative

By Resolution R94-1396, the Metropolitan Council designated MDHA as the lead agency responsible for the development and administration of the Consolidated Plan and its related grant programs. These functions are undertaken by MDHA's Community Development Department.

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PR-10 Consultation - 91.100, 91.200(b), 91.215(l)

1. Introduction

To ensure the Action Plan truly addresses the needs in Metro Nashville, citizen participation and stakeholder consultation activities were designed to help:

- Validate the accuracy of data;
- Determine priority needs and target areas;
- Increase coordination among partners;
- Expand outreach efforts; and
- Build support for Consolidated Plan activities.

Throughout the 2018 PY, MDHA staff consulted with stakeholders, non-profits, project sponsors, Metro departments and the Mayor's office for suggestions to improve or expand programs for PY 2019. Additional input on the development of the draft Plan was obtained through an online stakeholder/community survey that was sent to over 400 agencies, non-profits, community groups and organizations and was posted on the MDHA website. The survey generated 55 responses. Comments on the draft Action Plan were obtained during the 30-day public comment period and at the public hearing held during the comment period.

A summary of the survey responses is provided in Appendix C; and a summary of comments received orally at the public hearing and in writing during the public comment period on the draft Action Plan is provided in Appendix F. Notes from community meetings/public input sessions and stakeholder consultations are on file at MDHA. Please call 615-252-8505 or email consolidatedplan@nashville-mdha.org to review these notes.

In addition to general public input on the Action Plan, MDHA met with local stakeholders for further discussions regarding Housing Opportunities for Persons with HIV/AIDS needs on November 27, 2018. A summary of this consultation is included in Appendix D.

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

Public Housing Authority

MDHA is the public housing authority (PHA) in Metro Nashville and provides public/affordable housing through its Affordable Housing Department and rental assistance (i.e., Section 8 Vouchers) through the Rental Assistance Department and undertakes redevelopment of its properties through the Recapitalization Department. These functions are guided by the Five Year PHA Plan and are separate and distinct from the Community Development Department, which administers the Consolidated Plan and its related programs. Input on the needs of public/affordable housing residents and voucher-holders and how to address these needs was obtained through consultation with the leadership from these MDHA departments. Further, department directors participate in weekly staff meetings with MDHA executive leadership to review projects and coordinate efforts.

The Five Year PHA Plan, the Envision Cayce Master Plan, and the draft Napier/Sudekum Choice Neighborhoods Plan are among the other planning efforts considered when developing this Plan.

Partnership between MDHA and the Metro Homeless Impact Division (HID)

MDHA currently serves as the Collaborative Applicant for the Nashville-Davidson County Continuum of Care, and in that role, compiles the annual application to HUD for competitive CoC homeless funding. The City's Homeless Impact Division (HID) of Metropolitan Social Services is the designated entity for planning and coordinating efforts to address homelessness locally and currently serves as lead for the Homeless Management Information System (HMIS). MDHA Staff collaborates closely on projects and initiatives to ensure alignment with HID, dividing responsibilities for staffing the ad hoc committees and CoC General Membership.

In addition, a partnership between MDHA and HID allows for the utilization of up to 18 housing choice vouchers per month to support housing people experiencing literal homelessness. The goal is to focus on the most vulnerable populations who have experienced or are at risk of chronic homelessness and offer permanent supportive housing. Since this partnership began in May 2013, over 892 people have received a voucher.

Coordination with Private and Governmental Health, Mental Health, and Service Agencies

HID participates in a local effort led by the Metro Health Department called the Community Mental Health Systems Improvement (CMHSI) project that focuses on the most vulnerable people who experience behavioral and mental health issues and touch the health, mental health, criminal justice and social sectors. The effort resulted in the Crisis Treatment Center, a program of the Mental Health Cooperative that offers 24/7 free Crisis Assessment and Treatment services for any individual in Davidson County. This facility offers a therapeutic alternative to Emergency Rooms for individuals in a psychiatric crisis, and a diversion option for police officers so that, when appropriate, they can drop individuals off for treatment instead of booking them into jail for minor offences.

In addition, planning efforts are underway to improve coordination between the health, mental health, and criminal justice systems and include how to best address people's housing instability. This is a follow-up to an earlier attempt to create a Hospital to Home program, which is now integrated into this new effort.

In the meantime, one local hospital, Vanderbilt University Medical Center, has created a systems approach around a street psychiatry program that looks at ways to integrate and connect the approaches of health, mental health and homeless services. Vanderbilt University is partnering with community social service providers to link people with permanent supportive housing and has hired housing navigators that participate in the community's coordinated entry system (CES).

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

With guidance from HUD-provided technical assistance providers, the Cloudburst Group, the Nashville-Davidson County CoC and the Metropolitan government worked to to strengthen CoC governance by creating a unified leadership structure, the CoC Homelessness Planning Council, which formed in June, 2018 and had its' inaugural meeting in July, 2018. The hope is that this body will be able access/leverage additional local resources and integrate them with available federal and state resources to implement more effective efforts that end homelessness.

The CoC has created different committees that work on filling gaps and addressing specific populations. In particular, a Veterans workgroup has drafted an action plan for Nashville to be aligned with the federal government's goals and plans to effectively end homelessness. A youth and young adult workgroup drafted the Key Action Plan, an annually updated plan to address youth homelessness. This planning effort, for the first time, brought together stakeholders serving these particular populations. Most recently, this workgroup has put forth an application for the Youth Homelessness Demonstration Program (YHDP) grant. In July 2018, Nashville was notified that it was one of 11 communities across the country to be awarded funding, and weekly CoC Youth Steering Committee meetings have been attended by an array of stakeholders to prepare for an RFP process that will allocate over \$3.4 million to end homelessness among youth and young adults. An additional focus will be on ending family homelessness by bringing education partners to the table to collaborate with the CoC's family providers.

The HID, through its housing campaigns has created focused efforts and various initiatives to reduce chronic homelessness with an increased Housing First approach for people experiencing chronic and long-term homelessness.

Through CES, the HID brings together CoC providers who meet twice monthly in care coordination meetings for different populations. The care coordination meetings are set up to focus on families with children, individuals, and veterans. Plans are underway to integrate a special care coordination meeting for unaccompanied youth and young adults which are currently included in the meetings on individuals. The care coordination meetings examine the By Name Lists for each population. To be on a By Name List, households are literally homeless and have been assessed via the VI-SPDAT, the housing triage tool. Nashville is utilizing the VI-SPDAT for individuals, the Family-VI-SPDAT for families, and the TAY-VI-SPDAT for youth. At-risk populations will be identified by a preliminary common assessment through the HMIS prior to administering the VI-SPDAT.

Additionally, the CoC received a renewable grant to fund three (3) CES Coordinators who provide education to the community at large and engage any person who may be experiencing a housing crisis, who has yet to be connected to services.

Once assessed, the community has an agreed-upon a process to serve the most vulnerable people through a housing navigation process. The tools commonly utilized for the housing navigation process include the MTA annual bus pass program; access to SRO units at a local nonprofit provider; connection to available case management slots following a Critical Time Intervention (CTI) model; and a partnership between HID

and MDHA that provides up to 18 housing choice vouchers for people experiencing literal homelessness.

For Veterans, MDHA, together with the Mayor's Office, created a landlord incentive program to encourage landlords' participation in utilizing VASH vouchers. Furthermore, housing navigators have access to move-in costs through a special fund administered by the HID that pays for the first month's rent, utility deposits, security deposits, and if funding is available, other move-in costs including some arrears up to \$1,000 per household.

The past few years, HID has used CDBG funds to leverage move-in cost payments (utility and security deposits as well as first month rent) for people experiencing literal homelessness who have actively been working with housing navigators. Housing navigators are trained by the HID staff and are required to utilize the CES to apply for move-in costs. Currently, approximately 19 provider organizations representing street outreach, emergency shelter, mental health care, AIDS/HIV services, youth/young adults, and other director service providers participate in the housing navigation process. Housing navigators collaborate in monthly and bi-weekly meetings to address the specific needs of people experiencing homelessness with a housing-focused approach.

An effort with the health department, mental health community organizations, hospital representatives, correctional facilities, and homeless services coordinators is underway to collaborate on how to improve the intersection of these different sectors and improve services coordination among highly vulnerable populations in a housing crisis.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards and evaluate outcomes, and develop funding, policies and procedures for the administration of HMIS

In addition to administering the Consolidated Plan and its related programs (CDBG, HOME, HOPWA and ESG) for Metropolitan Nashville, MDHA currently serves as the CoC Collaborative Applicant. The HID is the HMIS Lead. The CoC Homelessness Planning Council has created working committees attended by diverse representations of partner agencies. The Planning Council via its' committee structure works to streamline performance standards across multiple funding sources. These efforts help create, revise and align the policies and procedures for CES, HMIS and the Performance Evaluation Processes.

In efforts to further align ESG with CoC priorities, there has been increased coordination/alignment between the CoC and ESG performance standards. The standing CoC CES Committee has joined with an ad hoc CoC Written Standards Committee to update the draft of the Written Performance Standards and MDHA is beginning to incorporate those standards as a part of its ESG application process. In 2018, members of the CoC's Performance Evaluation Committee (PEC) also served on the ESG Review Committee. Discussions are underway to potentially merge the PEC and ESG review committees to review proposed projects. Unfortunately, because of the timing of federal funding announcements, the funding cycles for the CoC and ESG are not aligned to allow for complete coordination.

The HMIS Committee serves as the advisory and oversight body to the CoC and HMIS Lead. Its primary purpose is to provide guidance to the CoC and HMIS Lead on planning; policy development; systems improvement, including regular data quality review; and to ensure the administration of HMIS in accordance with HUD guidelines.

The goals and duties of the HMIS Committee include:

- Informing the vision for HMIS and setting priorities to align with goals established by the CoC.
- Reviewing and monitoring strategic initiatives for HMIS.
- Developing and recommending approval of policies to the CoC Planning Council for local HMIS and the HMIS Lead and staff, including MOUs and data sharing agreements.
- Assuring appropriate data privacy mechanisms are in place and informing the process to manage data breaches as needed.
- Providing a platform to resolve provider concerns or issues.

HID and MDHA staff closely collaborate to ensure the components of the CES are fully integrated into HMIS. In addition, the joint staff conducted combined HMIS and CES trainings throughout 2018 for housing navigators and HMIS users. Metro government agencies have increased their communications through the creation of an interdepartmental council, which actively moved the City's response to homelessness from an enforcement-only approach to an engagement-first approach and focuses on linking people to needed services rather than arresting them for essentially being homeless. These efforts increase community outreach and education about streamlining processes and aligning funding to help more people.

While a lot of work has been done around the alignment of procedures, policies, and resources, the opportunity to make a big leap forward to build an efficient systems approach oriented on providing different options to assist people transition out of

homelessness is still in the development phase. The HMIS Advisory Committee identified areas of improvement and approved an action plan to shape policies and procedures of HMIS, implement data quality and privacy plans, etc.

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

A wide range of groups and organizations, from the public and private sectors and representing all areas covered by the Action Plan, participated in the Consultation process. The table below lists groups and organizations that were represented at stakeholder meetings and/or public input/community meetings.

1	Agency/Group/Organization	18th Avenue Family Enrichment Center
	Agency/Group/Organization Type	Services-Children
	What section of the Plan was addressed by Consultation?	Non-housing Community Development Strategy Economic Development
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Prior to drafting the 2019 Annual Action Plan, MDHA released a survey for stakeholders and community members to provide their input on developing the Plan. The survey covered the following topics: Homelessness and Housing for Persons with Aids; Affordable Housing and Affirmatively Furthering Fair Housing; and Non-Housing Community Development Needs. Further descriptions of the survey results are detailed in the summary attached as Appendix C.
2	Agency/Group/Organization	All-In All Starz, Inc. (American Baptist College)
	Agency/Group/Organization Type	Neighborhood Organization

	<p>What section of the Plan was addressed by Consultation?</p> <p>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Housing Needs Assessment</p> <p>Economic Development</p> <p>Anti-poverty Strategy</p> <p>Prior to drafting the 2019 Annual Action Plan, MDHA released a survey for stakeholders and community members to provide their input on developing the Plan. The survey covered the following topics: Homelessness and Housing for Persons with Aids; Affordable Housing and Affirmatively Furthering Fair Housing; and Non-Housing Community Development Needs. Further descriptions of the survey results are detailed in the summary attached as Appendix C.</p>
3	<p>Agency/Group/Organization</p> <p>Agency/Group/Organization Type</p> <p>What section of the Plan was addressed by Consultation?</p> <p>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>AAOC Camps for Youth Development</p> <p>Services-Children</p> <p>Non-housing Community Development Strategy</p> <p>Economic Development</p> <p>Anti-poverty Strategy</p> <p>Prior to drafting the 2019 Annual Action Plan, MDHA released a survey for stakeholders and community members to provide their input on developing the Plan. The survey covered the following topics: Homelessness and Housing for Persons with Aids; Affordable Housing and Affirmatively Furthering Fair Housing; and Non-Housing Community Development Needs. Further descriptions of the survey results are detailed in the summary attached as Appendix C.</p>
4	<p>Agency/Group/Organization</p>	<p>ABL Realty Services</p>

	<p>Agency/Group/Organization Type</p> <p>What section of the Plan was addressed by Consultation?</p> <p>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Housing</p> <p>Housing Needs Assessment</p> <p>Public Housing Needs</p> <p>Prior to drafting the 2019 Annual Action Plan, MDHA released a survey for stakeholders and community members to provide their input on developing the Plan. The survey covered the following topics: Homelessness and Housing for Persons with Aids; Affordable Housing and Affirmatively Furthering Fair Housing; and Non-Housing Community Development Needs. Further descriptions of the survey results are detailed in the summary attached as Appendix C.</p>
5	<p>Agency/Group/Organization</p> <p>Agency/Group/Organization Type</p> <p>What section of the Plan was addressed by Consultation?</p> <p>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Catholic Charities</p> <p>Services – Homeless</p> <p>Homeless Needs – Chronically homeless</p> <p>Homeless Needs – Families with children</p> <p>Homeless Needs – Veterans</p> <p>Homeless Needs – Unaccompanied youth Homeless Strategy</p> <p>Prior to drafting the 2019 Annual Action Plan, MDHA released a survey for stakeholders and community members to provide their input on developing the Plan. The survey covered the following topics: Homelessness and Housing for Persons with Aids; Affordable Housing and Affirmatively Furthering Fair Housing; and Non-Housing Community Development Needs. Further descriptions of the survey results are detailed in the summary attached as</p>

Appendix C.	
6	<p>Agency/Group/Organization</p> <p>Centerstone</p> <p>Agency/Group/Organization Type</p> <p>Services – Health (Behavioral)</p> <p>What section of the Plan was addressed by Consultation?</p> <p>Homeless Needs – Chronically homeless</p> <p>Homeless Strategy</p> <p>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</p> <p>Prior to drafting the 2019 Annual Action Plan, MDHA released a survey for stakeholders and community members to provide their input on developing the Plan. The survey covered the following topics: Homelessness and Housing for Persons with Aids; Affordable Housing and Affirmatively Furthering Fair Housing; and Non-Housing Community Development Needs. Further descriptions of the survey results are detailed in the summary attached as Appendix C.</p>
7	<p>Agency/Group/Organization</p> <p>Alliance for Green Hills</p> <p>Agency/Group/Organization Type</p> <p>Neighborhood Organization</p> <p>What section of the Plan was addressed by Consultation?</p> <p>Housing Needs Assessment</p> <p>Economic Development</p> <p>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</p> <p>Prior to drafting the 2019 Annual Action Plan, MDHA released a survey for stakeholders and community members to provide their input on developing the Plan. The survey covered the following topics: Homelessness and Housing for Persons with Aids; Affordable Housing and Affirmatively Furthering Fair Housing; and Non-Housing Community Development Needs. Further descriptions of the survey results are detailed in the summary attached as Appendix C.</p>

8	<p>Agency/Group/Organization</p> <p>Agency/Group/Organization Type</p> <p>What section of the Plan was addressed by Consultation?</p> <p>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Be a Helping Hand Foundation</p> <p>Housing</p> <p>Housing Needs Assessment</p> <p>Anti-Poverty Strategy</p> <p>Public Housing Strategy</p> <p>Prior to drafting the 2019 Annual Action Plan, MDHA released a survey for stakeholders and community members to provide their input on developing the Plan. The survey covered the following topics: Homelessness and Housing for Persons with Aids; Affordable Housing and Affirmatively Furthering Fair Housing; and Non-Housing Community Development Needs. Further descriptions of the survey results are detailed in the summary attached as Appendix C.</p>
9	<p>Agency/Group/Organization</p> <p>Agency/Group/Organization Type</p> <p>What section of the Plan was addressed by Consultation?</p> <p>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Conexión Américas</p> <p>Neighborhood Organization (Latino Community)</p> <p>Housing Needs Assessment</p> <p>Economic Development</p> <p>Anti-poverty Strategy</p> <p>Prior to drafting the 2019 Annual Action Plan, MDHA released a survey for stakeholders and community members to provide their input on developing the Plan. The survey covered the following topics: Homelessness and Housing for Persons with Aids; Affordable Housing and Affirmatively Furthering Fair Housing; and Non-Housing Community Development Needs. Further descriptions of the survey results are detailed in the summary attached as</p>

		Appendix C.
10	<p>Agency/Group/Organization</p> <p>Agency/Group/Organization Type</p> <p>What section of the Plan was addressed by Consultation?</p> <p>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Bordeaux Neighborhood Association</p> <p>Neighborhood Organization</p> <p>Housing Needs Assessment</p> <p>Economic Development</p> <p>Non-housing Community Development Strategy</p> <p>Prior to drafting the 2019 Annual Action Plan, MDHA released a survey for stakeholders and community members to provide their input on developing the Plan. The survey covered the following topics: Homelessness and Housing for Persons with Aids; Affordable Housing and Affirmatively Furthering Fair Housing; and Non-Housing Community Development Needs. Further descriptions of the survey results are detailed in the summary attached as Appendix C.</p>
11	<p>Agency/Group/Organization</p> <p>Agency/Group/Organization Type</p> <p>What section of the Plan was addressed by Consultation?</p> <p>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Bridges for the Deaf and Hard of Hearing</p> <p>Services-Elderly</p> <p>Services-Persons with Disability</p> <p>Non-housing Community Development Needs</p> <p>Non-homeless Special Needs</p> <p>Prior to drafting the 2019 Annual Action Plan, MDHA released a survey for stakeholders and community members to provide their input on developing the Plan. The survey covered the following topics: Homelessness and Housing for Persons with Aids; Affordable Housing and Affirmatively Furthering Fair</p>

		Housing; and Non-Housing Community Development Needs. Further descriptions of the survey results are detailed in the summary attached as Appendix C.
12	Agency/Group/Organization Agency/Group/Organization Type What section of the Plan was addressed by Consultation? How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Buffalo Valley, Inc. Services – Homeless Homeless Needs – Chronically homeless Homeless Needs – Veterans Homelessness Strategy Prior to drafting the 2019 Annual Action Plan, MDHA released a survey for stakeholders and community members to provide their input on developing the Plan. The survey covered the following topics: Homelessness and Housing for Persons with Aids; Affordable Housing and Affirmatively Furthering Fair Housing; and Non-Housing Community Development Needs. Further descriptions of the survey results are detailed in the summary attached as Appendix C.
13	Agency/Group/Organization Agency/Group/Organization Type What section of the Plan was addressed by Consultation? How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	CE McGruder Family Resource Center Services-Children Services- Education Non-housing Community Development Strategy Economic Development Prior to drafting the 2019 Annual Action Plan, MDHA released a survey for stakeholders and community members to provide their input on developing the Plan. The survey covered the following

		<p>topics: Homelessness and Housing for Persons with Aids; Affordable Housing and Affirmatively Furthering Fair Housing; and Non-Housing Community Development Needs. Further descriptions of the survey results are detailed in the summary attached as Appendix C.</p>
14	<p>Agency/Group/Organization</p> <p>Agency/Group/Organization Type</p> <p>What section of the Plan was addressed by Consultation?</p> <p>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Davidson County Relative Caregiver Program</p> <p>Services-Elderly</p> <p>Services-Persons with Disabilities</p> <p>Housing Needs Assessment</p> <p>Non-homeless Special Needs</p> <p>Prior to drafting the 2019 Annual Action Plan, MDHA released a survey for stakeholders and community members to provide their input on developing the Plan. The survey covered the following topics: Homelessness and Housing for Persons with Aids; Affordable Housing and Affirmatively Furthering Fair Housing; and Non-Housing Community Development Needs. Further descriptions of the survey results are detailed in the summary attached as Appendix C.</p>
15	<p>Agency/Group/Organization</p> <p>Agency/Group/Organization Type</p> <p>What section of the Plan was addressed by Consultation?</p> <p>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for</p>	<p>Empower Tennessee</p> <p>Civic Leaders</p> <p>Anti-Poverty Strategy</p> <p>Housing Needs Assessment</p> <p>Economic Development</p> <p>Prior to drafting the 2019 Annual Action Plan, MDHA released a survey for stakeholders and community members</p>

	improved coordination?	to provide their input on developing the Plan. The survey covered the following topics: Homelessness and Housing for Persons with Aids; Affordable Housing and Affirmatively Furthering Fair Housing; and Non-Housing Community Development Needs. Further descriptions of the survey results are detailed in the summary attached as Appendix C.
16	Agency/Group/Organization Agency/Group/Organization Type What section of the Plan was addressed by Consultation? How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	First Tennessee Bank Business Leaders Private Sector Banking/Financing Housing Needs Assessment Economic Development Prior to drafting the 2019 Annual Action Plan, MDHA released a survey for stakeholders and community members to provide their input on developing the Plan. The survey covered the following topics: Homelessness and Housing for Persons with Aids; Affordable Housing and Affirmatively Furthering Fair Housing; and Non-Housing Community Development Needs. Further descriptions of the survey results are detailed in the summary attached as Appendix C.
17	Agency/Group/Organization Agency/Group/Organization Type What section of the Plan was addressed by Consultation? How was the Agency/Group/Organization	Family and Children's Services Other Government - local Homeless Needs – Families with Children Homelessness Strategy Anti-poverty Strategy Prior to drafting the 2019 Annual Action

	<p>consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Plan, MDHA released a survey for stakeholders and community members to provide their input on developing the Plan. The survey covered the following topics: Homelessness and Housing for Persons with Aids; Affordable Housing and Affirmatively Furthering Fair Housing; and Non-Housing Community Development Needs. Further descriptions of the survey results are detailed in the summary attached as Appendix C.</p>
18	<p>Agency/Group/Organization</p> <p>Agency/Group/Organization Type</p> <p>What section of the Plan was addressed by Consultation?</p> <p>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Habitat for Humanity of Greater Nashville</p> <p>Housing</p> <p>Housing Needs Assessment</p> <p>Prior to drafting the 2019 Annual Action Plan, MDHA released a survey for stakeholders and community members to provide their input on developing the Plan. The survey covered the following topics: Homelessness and Housing for Persons with Aids; Affordable Housing and Affirmatively Furthering Fair Housing; and Non-Housing Community Development Needs. Further descriptions of the survey results are detailed in the summary attached as Appendix C.</p>
19	<p>Agency/Group/Organization</p> <p>Agency/Group/Organization Type</p> <p>What section of the Plan was addressed by Consultation?</p>	<p>Goodwill Industries of Middle Tennessee, Inc.</p> <p>Services- Children</p> <p>Services-Homeless</p> <p>Services-Employment</p> <p>Non-housing Community Development Strategy</p>

	<p>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Economic Development</p> <p>Homelessness Needs</p> <p>Prior to drafting the 2019 Annual Action Plan, MDHA released a survey for stakeholders and community members to provide their input on developing the Plan. The survey covered the following topics: Homelessness and Housing for Persons with Aids; Affordable Housing and Affirmatively Furthering Fair Housing; and Non-Housing Community Development Needs. Further descriptions of the survey results are detailed in the summary attached as Appendix C.</p>
20	<p>Agency/Group/Organization</p> <p>Agency/Group/Organization Type</p> <p>What section of the Plan was addressed by Consultation?</p> <p>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Metro Public Health Department</p> <p>Health Agency</p> <p>Other Government - Local</p> <p>Homelessness Strategy</p> <p>Non-homeless Special Needs</p> <p>Non-housing Community Development Strategy</p> <p>Prior to drafting the 2019 Annual Action Plan, MDHA released a survey for stakeholders and community members to provide their input on developing the Plan. The survey covered the following topics: Homelessness and Housing for Persons with Aids; Affordable Housing and Affirmatively Furthering Fair Housing; and Non-Housing Community Development Needs. Further descriptions of the survey results are detailed in the summary attached as Appendix C.</p>
21	<p>Agency/Group/Organization</p>	<p>Workforce Essentials</p>

	<p>Agency/Group/Organization Type</p> <p>What section of the Plan was addressed by Consultation?</p> <p>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Business Leaders</p> <p>Other</p> <p>Economic Development</p> <p>Anti-poverty Strategy</p> <p>Prior to drafting the 2019 Annual Action Plan, MDHA released a survey for stakeholders and community members to provide their input on developing the Plan. The survey covered the following topics: Homelessness and Housing for Persons with Aids; Affordable Housing and Affirmatively Furthering Fair Housing; and Non-Housing Community Development Needs. Further descriptions of the survey results are detailed in the summary attached as Appendix C .</p>
22	<p>Agency/Group/Organization</p> <p>Agency/Group/Organization Type</p> <p>What section of the Plan was addressed by Consultation?</p> <p>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Members of Metro Council and/or Metro Government</p> <p>Civic Leaders</p> <p>Other Government - Local</p> <p>Housing Needs Assessment</p> <p>Public Housing Needs</p> <p>Economic Development</p> <p>Homelessness Needs</p> <p>Non-housing Community Development Strategy</p> <p>Prior to drafting the 2019 Annual Action Plan, MDHA released a survey for stakeholders and community members to provide their input on developing the Plan. The survey covered the following topics: Homelessness and Housing for Persons with Aids; Affordable Housing and Affirmatively Furthering Fair</p>

		Housing; and Non-Housing Community Development Needs. Further descriptions of the survey results are detailed in the summary attached as Appendix C.
23	Agency/Group/Organization Agency/Group/Organization Type What section of the Plan was addressed by Consultation? How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	MiKen Development LLC Housing Housing Needs Assessment Public Housing Needs Prior to drafting the 2019 Annual Action Plan, MDHA released a survey for stakeholders and community members to provide their input on developing the Plan. The survey covered the following topics: Homelessness and Housing for Persons with Aids; Affordable Housing and Affirmatively Furthering Fair Housing; and Non-Housing Community Development Needs. Further descriptions of the survey results are detailed in the summary attached as Appendix C.
24	Agency/Group/Organization Agency/Group/Organization Type What section of the Plan was addressed by Consultation? How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Monroe Harding, Inc. Services- Children Non-housing Community Development Strategy Homeless Needs – Families with children Homeless Needs – Unaccompanied Youth Prior to drafting the 2019 Annual Action Plan, MDHA released a survey for stakeholders and community members to provide their input on developing the Plan. The survey covered the following topics: Homelessness and Housing for

		Persons with Aids; Affordable Housing and Affirmatively Furthering Fair Housing; and Non-Housing Community Development Needs. Further descriptions of the survey results are detailed in the summary attached as Appendix C.
25	Agency/Group/Organization Agency/Group/Organization Type What section of the Plan was addressed by Consultation? How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	NOAH-Nashville Organized for Action and Hope Other – Local Advocacy Group Housing Needs Assessment Public Housing Needs Homelessness Strategy Prior to drafting the 2019 Annual Action Plan, MDHA released a survey for stakeholders and community members to provide their input on developing the Plan. The survey covered the following topics: Homelessness and Housing for Persons with Aids; Affordable Housing and Affirmatively Furthering Fair Housing; and Non-Housing Community Development Needs. Further descriptions of the survey results are detailed in the summary attached as Appendix C.
26	Agency/Group/Organization Agency/Group/Organization Type What section of the Plan was addressed by Consultation? How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for	Office of Family Safety-Jean Crowe Advocacy Center Child Welfare Agency Services-Health Non-homeless Special Needs Homelessness Strategy Prior to drafting the 2019 Annual Action Plan, MDHA released a survey for stakeholders and community members

	improved coordination?	to provide their input on developing the Plan. The survey covered the following topics: Homelessness and Housing for Persons with Aids; Affordable Housing and Affirmatively Furthering Fair Housing; and Non-Housing Community Development Needs. Further descriptions of the survey results are detailed in the summary attached as Appendix C.
27	Agency/Group/Organization Agency/Group/Organization Type What section of the Plan was addressed by Consultation? How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Successful Survivors-HOPEWORKS Housing Housing Needs Assessment Public Housing Needs Prior to drafting the 2019 Annual Action Plan, MDHA released a survey for stakeholders and community members to provide their input on developing the Plan. The survey covered the following topics: Homelessness and Housing for Persons with Aids; Affordable Housing and Affirmatively Furthering Fair Housing; and Non-Housing Community Development Needs. Further descriptions of the survey results are detailed in the summary attached as Appendix C.
28	Agency/Group/Organization Agency/Group/Organization Type What section of the Plan was addressed by Consultation? How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Next Door Services - Homeless Homelessness Strategy Prior to drafting the 2019 Annual Action Plan, MDHA released a survey for stakeholders and community members to provide their input on developing the Plan. The survey covered the following topics: Homelessness and Housing for

		Persons with Aids; Affordable Housing and Affirmatively Furthering Fair Housing; and Non-Housing Community Development Needs. Further descriptions of the survey results are detailed in the summary attached as Appendix C.
29	Agency/Group/Organization Agency/Group/Organization Type What section of the Plan was addressed by Consultation? How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Welcome Home Ministries Services-Homeless Homeless Needs-Chronically Homeless Homelessness Strategy Prior to drafting the 2019 Annual Action Plan, MDHA released a survey for stakeholders and community members to provide their input on developing the Plan. The survey covered the following topics: Homelessness and Housing for Persons with Aids; Affordable Housing and Affirmatively Furthering Fair Housing; and Non-Housing Community Development Needs. Further descriptions of the survey results are detailed in the summary attached as Appendix C.
30	Agency/Group/Organization Agency/Group/Organization Type What section of the Plan was addressed by Consultation? How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	TruCare Transformation Services-Health Non-Homeless Special Needs Prior to drafting the 2019 Annual Action Plan, MDHA released a survey for stakeholders and community members to provide their input on developing the Plan. The survey covered the following topics: Homelessness and Housing for Persons with Aids; Affordable Housing and Affirmatively Furthering Fair Housing; and Non-Housing Community

	<p>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Anti-poverty Strategy</p> <p>Prior to drafting the 2019 Annual Action Plan, MDHA released a survey for stakeholders and community members to provide their input on developing the Plan. The survey covered the following topics: Homelessness and Housing for Persons with Aids; Affordable Housing and Affirmatively Furthering Fair Housing; and Non-Housing Community Development Needs. Further descriptions of the survey results are detailed in the summary attached as Appendix C.</p>
33	<p>Agency/Group/Organization</p> <p>Agency/Group/Organization Type</p> <p>What section of the Plan was addressed by Consultation?</p> <p>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Nashville Cares</p> <p>Services – Persons with HIV/AIDS</p> <p>Non-homeless Special Needs</p> <p>HOPWA Strategy</p> <p>Homeless Needs – Chronically homeless</p> <p>Homeless Needs – Families with children</p> <p>Homeless Needs – Veterans</p> <p>Homeless Needs – Unaccompanied youth</p> <p>Homeless Strategy</p> <p>Agency participated in HOPWA consultation and provided input in the online survey. Detailed discussions included in Appendices C and D .</p>
34	<p>Agency/Group/Organization</p> <p>Agency/Group/Organization Type</p> <p>What section of the Plan was addressed</p>	<p>New Level CDC</p> <p>Housing</p> <p>Housing Needs Assessment</p>

	<p>by Consultation?</p> <p>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Market Analysis</p> <p>Economic Development</p> <p>Anti-poverty Strategy</p> <p>Prior to drafting the 2019 Annual Action Plan, MDHA released a survey for stakeholders and community members to provide their input on developing the Plan. The survey covered the following topics: Homelessness and Housing for Persons with Aids; Affordable Housing and Affirmatively Furthering Fair Housing; and Non-Housing Community Development Needs. Further descriptions of the survey results are detailed in the summary attached as Appendix C.</p>
35	<p>Agency/Group/Organization</p> <p>Agency/Group/Organization Type</p> <p>What section of the Plan was addressed by Consultation?</p> <p>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for</p>	<p>Open Table Nashville</p> <p>Housing</p> <p>Services – Homeless</p> <p>Housing Needs Assessment</p> <p>Homeless Needs – Chronically homeless</p> <p>Homeless Needs – Families with children</p> <p>Homeless Needs – Veterans</p> <p>Homeless Needs – Unaccompanied youth</p> <p>Homeless Strategy</p> <p>Economic Development</p> <p>Anti-poverty</p> <p>Prior to drafting the 2019 Annual Action Plan, MDHA released a survey for stakeholders and community members</p>

	improved coordination?	to provide their input on developing the Plan. The survey covered the following topics: Homelessness and Housing for Persons with Aids; Affordable Housing and Affirmatively Furthering Fair Housing; and Non-Housing Community Development Needs. Further descriptions of the survey results are detailed in the summary attached as Appendix C.
36	Agency/Group/Organization Agency/Group/Organization Type What section of the Plan was addressed by Consultation? How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Operation Stand Down Services – Homeless Other (Veterans) Homeless Needs –Veterans Homeless Strategy Prior to drafting the 2019 Annual Action Plan, MDHA released a survey for stakeholders and community members to provide their input on developing the Plan. The survey covered the following topics: Homelessness and Housing for Persons with Aids; Affordable Housing and Affirmatively Furthering Fair Housing; and Non-Housing Community Development Needs. Further descriptions of the survey results are detailed in the summary attached as Appendix C.
37	Agency/Group/Organization Agency/Group/Organization Type What section of the Plan was addressed by Consultation?	Project Return Services – Homeless Other (Formerly Incarcerated) Housing Needs Assessment Homeless Needs – Chronically homeless Homeless Needs – Families with

	<p>children</p> <p>Homeless Needs – Veterans</p> <p>Homeless Strategy</p> <p>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Prior to drafting the 2019 Annual Action Plan, MDHA released a survey for stakeholders and community members to provide their input on developing the Plan. The survey covered the following topics: Homelessness and Housing for Persons with Aids; Affordable Housing and Affirmatively Furthering Fair Housing; and Non-Housing Community Development Needs. Further descriptions of the survey results are detailed in the summary attached as Appendix C.</p>
38	<p>Agency/Group/Organization</p> <p>Agency/Group/Organization Type</p> <p>What section of the Plan was addressed by Consultation?</p> <p>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Rebuilding Together Nashville</p> <p>Housing</p> <p>Housing Needs Assessment</p> <p>Lead-based Paint Strategy</p> <p>Prior to drafting the 2019 Annual Action Plan, MDHA released a survey for stakeholders and community members to provide their input on developing the Plan. The survey covered the following topics: Homelessness and Housing for Persons with Aids; Affordable Housing and Affirmatively Furthering Fair Housing; and Non-Housing Community Development Needs. Further descriptions of the survey results are detailed in the summary attached as Appendix C.</p>
39	<p>Agency/Group/Organization</p> <p>Agency/Group/Organization Type</p> <p>What section of the Plan was addressed</p>	<p>Salvation Army</p> <p>Services – Homeless</p> <p>Homeless Needs – Chronically</p>

	<p>by Consultation?</p> <p>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>homeless</p> <p>Homeless Needs – Families with children</p> <p>Homeless Strategy</p> <p>Prior to drafting the 2019 Annual Action Plan, MDHA released a survey for stakeholders and community members to provide their input on developing the Plan. The survey covered the following topics: Homelessness and Housing for Persons with Aids; Affordable Housing and Affirmatively Furthering Fair Housing; and Non-Housing Community Development Needs. Further descriptions of the survey results are detailed in the summary attached as Appendix C.</p>
40	<p>Agency/Group/Organization</p> <p>Agency/Group/Organization Type</p> <p>What section of the Plan was addressed by Consultation?</p> <p>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>St. Luke's Community House</p> <p>Neighborhood Organization</p> <p>Housing Needs Assessment</p> <p>Economic Development</p> <p>Anti-poverty Strategy</p> <p>Prior to drafting the 2019 Annual Action Plan, MDHA released a survey for stakeholders and community members to provide their input on developing the Plan. The survey covered the following topics: Homelessness and Housing for Persons with Aids; Affordable Housing and Affirmatively Furthering Fair Housing; and Non-Housing Community Development Needs. Further descriptions of the survey results are detailed in the summary attached as Appendix C.</p>
41	<p>Agency/Group/Organization</p>	<p>Tennessee Housing Development</p>

	<p>Agency/Group/Organization Type</p> <p>What section of the Plan was addressed by Consultation?</p> <p>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Agency</p> <p>Housing</p> <p>Other government - State</p> <p>Housing Needs Assessment</p> <p>Prior to drafting the 2019 Annual Action Plan, MDHA released a survey for stakeholders and community members to provide their input on developing the Plan. The survey covered the following topics: Homelessness and Housing for Persons with Aids; Affordable Housing and Affirmatively Furthering Fair Housing; and Non-Housing Community Development Needs. Further descriptions of the survey results are detailed in the summary attached as Appendix C.</p>
42	<p>Agency/Group/Organization</p> <p>Agency/Group/Organization Type</p> <p>What section of the Plan was addressed by Consultation?</p> <p>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Tennessee Fair Housing Council</p> <p>Services – Fair Housing</p> <p>Housing Needs Assessment</p> <p>Economic Development</p> <p>Anti-poverty Strategy</p> <p>Prior to drafting the 2019 Annual Action Plan, MDHA released a survey for stakeholders and community members to provide their input on developing the Plan. The survey covered the following topics: Homelessness and Housing for Persons with Aids; Affordable Housing and Affirmatively Furthering Fair Housing; and Non-Housing Community Development Needs. Further descriptions of the survey results are detailed in the summary attached as Appendix C.</p>

43	<p>Agency/Group/Organization</p> <p>Agency/Group/Organization Type</p> <p>What section of the Plan was addressed by Consultation?</p> <p>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>The Housing Fund</p> <p>Community Development Financial Institution</p> <p>Housing Needs Assessment</p> <p>Prior to drafting the 2019 Annual Action Plan, MDHA released a survey for stakeholders and community members to provide their input on developing the Plan. The survey covered the following topics: Homelessness and Housing for Persons with Aids; Affordable Housing and Affirmatively Furthering Fair Housing; and Non-Housing Community Development Needs. Further descriptions of the survey results are detailed in the summary attached as Appendix C.</p>
44	<p>Agency/Group/Organization</p> <p>Agency/Group/Organization Type</p> <p>What section of the Plan was addressed by Consultation?</p> <p>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>W.O.M.E.N.</p> <p>Services – Persons with HIV/AIDS</p> <p>Non-Homeless Special Needs</p> <p>HOPWA Strategy</p> <p>Agency participated in HOPWA consultation. Detailed discussion is included in Appendix D.</p>
45	<p>Agency/Group/Organization</p> <p>Agency/Group/Organization Type</p> <p>What section of the Plan was addressed by Consultation?</p> <p>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for</p>	<p>Meharry Community Wellness Center</p> <p>Services-Persons with HIV/AIDS</p> <p>Health Agency</p> <p>HOPWA Strategy</p> <p>Agency participated in HOPWA consultation. Detailed discussion is included in Appendix D.</p>

	improved coordination?	
46	Agency/Group/Organization Agency/Group/Organization Type What section of the Plan was addressed by Consultation? How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Veterans Affairs Department Services – Veterans Other government – Federal Homeless Needs – Chronically homeless Homeless Needs – Families with children Homeless Needs – Veterans Homeless Strategy Prior to drafting the 2019 Annual Action Plan, MDHA released a survey for stakeholders and community members to provide their input on developing the Plan. The survey covered the following topics: Homelessness and Housing for Persons with Aids; Affordable Housing and Affirmatively Furthering Fair Housing; and Non-Housing Community Development Needs. Further descriptions of the survey results are detailed in the summary attached as Appendix C.

Table 2 – Agencies, groups, organizations who participated

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

MDHA attempted to engage as many stakeholders as possible for input into the Plan. Stakeholders who wanted to provide additional input were invited to schedule an appointment with MDHA staff.

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

In recent years, a number of plans and reports regarding housing needs, transportation needs, and growth have been published. The Action Plan will continue to build on the following planning efforts and align with local initiatives.

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
2017 Analysis of Impediments to Fair Housing Choice (formerly 2017 Joint Assessment of Fair Housing)	MDHA	The fair housing analysis took an in-depth look and disparities in housing and opportunities. Goals from this analysis are incorporated into this Plan.
2017 Community Needs Evaluation (February 2018)	Metro Social Services	The CNE provides an overview of social service needs and resources available to meet these needs. The CNE is used as a supplement for the needs assessments and market analyses undertaken through this Plan.
Affordable Housing Primer, Part 1 (January 2018)	Metro Human Relations Commission	This Primer explains the concepts of affordable housing and analyzes gaps between incomes and housing costs and was used as a supplemental resource for this Plan.
Envision Cayce Master Plan (July 2014) and draft Envision Napier and Sudekum Transformation Plan (January 2018)	MDHA	These plans reflect MDHA's commitment to transform areas of distressed public housing into neighborhoods of opportunity. These Plans serve as the basis for some of the geographical priorities in the Consolidated Plan.
Let's Move Nashville	Mayor's Office	Taskforce recommendations offer

Transit and Affordability
Taskforce
Recommendations
(January 2018)

policy, project, and programmatic recommendations to guide the development of transit corridors. Recommendations regarding affordable housing along transit corridors were considered when developing priorities for the Consolidated Plan.

Nashville Youth Violence
Summit Report (March
2016)

Mayor's Office

The purpose of the Report is to increase awareness concerning youth violence and address it through comprehensive community and government planning. The Consolidated Plan proposes to fund youth programs as part of this effort.

Nashville-Davidson County
Continuum of Care

MDHA

The CoC seeks to improve coordination of resources to maximize housing and services for homeless persons. This Plan evaluates homeless needs and produces a homelessness strategic plan as well as provides for funding to assist homeless persons and families.

NashvilleNext (Amended
August 2017)

Metro Planning
Department

NashvilleNext is the City's General Plan to guide growth through 2040. Proposed Consolidated Plan activities are consistent with NashvilleNext.

nMotion, Nashville
MTA/RTA Strategic Plan
(September 2016)

Metro Transit
Authority

This Plan sets forth recommendations to address regional transportation issues as the region continues to grow. Recommendations were considered when developing strategies to address affordable

<p>PHA Five Year Plan (October 1, 2014 – September 30, 2019) & Annual Plan (October 1, 2018 – September 30, 2019)</p>	<p>MDHA</p>	<p>housing along transit corridors.</p> <p>The PHA Plan sets forth MDHA's vision to address the needs of public and affordable housing residents. Activities identified in the Consolidated Plan to support these needs align with the PHA Plan.</p>
<p>The Housing Nashville Report (April 2017)</p>	<p>Mayor's Office of Housing</p>	<p>The Housing Nashville Report produced by the Mayor's Office of Housing provides benchmark data on housing and established priorities for funding, building, preserving, and retaining affordable housing options. The Consolidated Plan incorporates data and recommendations from this Report.</p>
<p>The Nashville Promise Zone (Designated June 2016)</p>	<p>Mayor's Office in collaboration with MDHA</p>	<p>The 6 Promise Zone Goals related to housing, jobs, economic opportunities, education, infrastructure, and safety are reflected in the goals and priorities of the Consolidated Plan.</p>
<p>Transportation as a Key to Housing Affordability – Issue Brief (2018)</p>	<p>Tennessee Housing Development Agency</p>	<p>This Brief studies the impact of housing location and transportation costs. Findings from this brief were considered when determining Consolidated Plan priorities.</p>

Table 3 – Other local / regional / federal planning efforts

Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Consolidated Plan (91.215(I))

Although MDHA is the administrator of the Consolidated Plan, it is not a department of the Metropolitan Government. To ensure the Plan reflects the City's priorities and aligns with its initiatives, representatives from the following Metro Offices are consulted throughout the year for suggestions and ideas to meet these initiatives.

- Mayor's Office of Housing
- Homeless Impact Division
- Metro Human Relations Commission
- Metro Planning Department (brief engagement)
- Metro Social Services

As indicated in the list of agencies consulted (Table 2), representatives from several local (other MDHA and Metro Departments), state (Tennessee Housing Development Agency), and federal (Department of Veterans Affairs) agencies, contributed to the Plan.

PR-15 Citizen Participation

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

Summarize citizen participation process and how it impacted goal-setting

Activities proposed during the 2019 Program Year continue to further the priorities of the 2018-2023 Consolidated Plan which were established after a lengthy planning and public participation process. The Citizen Participation Plan provides information on how citizens can become involved in the development, implementation and evaluation of housing and community development programs. The Citizen Participation Plan is available at <http://www.nashville-mdha.org/?p=1847>.

Interaction with the public and comments received throughout the year, as well as input from stakeholders and consultations described in AP-10 shaped the particular activities proposed in this Action Plan that aligned with the priorities previously established in the 2018-2023 Consolidated Plan. Comments submitted during the public comment period have been considered and incorporated to the extent possible into the final Action Plan.

For the purpose of the 2019 Action Plan, the public comment began on April 11, 2019 and concluded at 4:00 p.m. on May 15, 2019. During the public comment period, members of the public were invited to share their comments at a public hearing. Details

regarding the public comment period and public hearing are provided in the Public Notice included in Appendix E.

The Public Notice was published in English and Spanish advertised in *The Tennessean*, *The Tribune*, and *El Crucero*. In addition, the Notice was posted in English and Spanish at MDHA administrative and public/affordable housing properties and on MDHA's website (www.nashville-mdha.org). The Notice was widely distributed via email to over 300 partners, government officials, nonprofit organizations, businesses, neighborhood groups, and citizens, whose email addresses have been provided to MDHA, and was sent to the Mayor's Office, Vice Mayor Briley, and Members of the Metro Council. MDHA encouraged recipients to circulate the Notice among their networks. The public comment period and public hearing and reminders were publicized via MDHA's social media outlets. Notice was specifically provided to Conexión Américas, The Center for Independent Living of Middle Tennessee, Native American Indian Association of Tennessee, Nashville International Center for Empowerment, and Metro Council. The public hearing held on April 23, 2019 was broadcast multiple times on the local government access channel, Metro 3. In addition, the video of the public hearing was made available on Metro's YouTube Channel.

Reasonable Accommodation

Information on how persons with disabilities or sensory impairments or in need of translation services could request accommodation was provided on all Public Notices, in emails advertising community meetings/public input sessions, and posted on the Consolidated Plan webpage in Spanish, Chinese, Vietnamese, Arabic, and Somali. MDHA will make every effort to accommodate reasonable requests if they are made not later than five (5) business days prior to any meeting. Public Notices are translated to Spanish.

The results of these outreach efforts are summarized in the following Table.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Newspaper Ad (The Tennessean)	Non-targeted/broad Community	N/A	N/A	N/A	
2	Newspaper Ad (The Tribune)	Minorities	N/A	N/A	N/A	
3	Newspaper Ad (El Crucero)	Non-English Speaking (Spanish)	N/A	N/A	N/A	
4	Internet Outreach (MDHA Website)	Non-targeted/broad Community	N/A	N/A	N/A	www.nashville-mdha.org
5	Internet Outreach (Social Media)	Non-targeted/broad Community	N/A	N/A	N/A	
6	Other: Posting at Public Housing & Other MDHA Properties	Residents of Public and Assisted Housing	N/A	N/A	N/A	
7	Other: Public Hearing – April 23, 2019	Non-targeted/broad Community	See Appendix F.	See Appendix F.	See Appendix F.	
8	Other: Email Distribution	Non-targeted/broad community	N/A	N/A	N/A	

9	Other: Targeted Email	Non-English speaking persons (Spanish); Immigrants; Native Americans; Minorities; Persons with Disabilities	N/A	N/A	N/A	
11	Other: Video of April 23, 2019 Public Hearing available on YouTube	Non-targeted/broad community	N/A	N/A	N/A	

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

As of the release of the Action Plan draft on April 11, 2019, HUD had not announced the 2019 allocations for CDBG, HOME, ESG, and HOPWA. These allocations were released on April 25, 2019 and the 2019 budgets for CDBG and HOME project activities have been updated based on the percentages used to calculate project activity budgets in draft Action Plan that was released at the start of the public comment period. The Allocation Amounts listed in the table below are final amounts based on the 2019 allocations. CDBG Program Income (PI) is estimated based on the average amount of PI collected for the program. HOME PI reflects PI receipted as of February, 2019 with estimates based on average receipts thru April 30, 2019.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 2				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Admin and Planning Economic Development Housing Public Improvements Public Services	5,112,559	250,000	0	5,362,559	16,087,677	Amount based on 2019 allocations.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 2				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Homebuyer assistance Multifamily rental new construction New construction for ownership	2,330,266	342,000.00	0	2,672,266	8,016,798	Amount based on 2019 allocations.
HOPWA	public - federal	Permanent housing in facilities Permanent housing placement Short term or transitional housing facilities STRMU Supportive services	1,373,743	0	0	1,373,743	4,121,229	Amount based on 2019 allocations.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 2				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	public - federal	Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	432,358	0	0	432,358	1,297,074	Amount based on 2019 allocations.

Table 56 - Expected Resources – Priority Table

In addition to the Consolidated Plan formula grants, funding from other Federal programs and local funds will be used to address Consolidated Plan priorities: Continuum of Care (CoC) funds, Neighborhood Stabilization Program (NSP) I and II Program Income, and CDBG Disaster Recovery (CDBG-DR) Program Income. For 2018-2019, the Nashville-Davidson County CoC has received over \$3.5 million through the annual competition for homeless assistance programs to be undertaken by MDHA and nonprofit organizations. MDHA has approximately \$560,000 in NSP PI on hand with an estimated \$120,000 expected to be received annually during five-year period covered by this Consolidated Plan from rental income from two multifamily rental projects previously acquired and constructed under the NSP programs. MDHA

plans to use NSP PI to fund housing activities that will benefit persons with incomes of up to 120% AMI to fill the gap for housing units for persons with incomes between 80 – 120% AMI as identified in the Mayor’s Housing Report Needs and Gap Analysis as other programs are limited to providing units for persons whose income does not exceed 60 to 80% AMI. NSP1 PI funds will be targeted to provide units countywide, while NSP2 PI funds will be targeted to the 17 census tracts identified in the NSP2 application. It is possible that some projects will be able to use PI from both sources. The funds will be loaned or granted as gap financing to nonprofit and for profit developers for eligible NSP activities through a Request for Proposal process. The minimum affordability period will be consistent with the HOME program requirements, where the affordability period ranges from 5 to 20 years based on the amount of the per-unit investment. Any PI generated from loans to developers will be used to fund additional projects.

On average, \$165,000 in CDBG-DR PI is generated annually through housing activities undertaken by The Housing Fund (THF). No Program Income is currently on hand as THF continues to use funds to acquire, rehab, and sell homes in flood-impacted areas to LMI buyers. It is expected that the CDBG-DR grant will be closed out in early 2020; at that time, CDBG-DR PI will become PI to the CDBG program.

MDHA receives pass through funding from the Tennessee Housing Development Agency (THDA) for the U.S. Department of Energy Weatherization Assistance Program (WAP) and for the U.S. Department of Health and Human Services Low Income Home Energy Assistance Program (LIHEAP), which are used jointly to install weatherization measures for very low income households. At the time of draft publication, current allocation amounts are used as 2019 allocations have not been announced.

During the five year Consolidated Plan period, MDHA and Metro will consider Section 108 Loan Guarantee opportunities to further the goals of this Plan.

The Metropolitan Government also funds affordable housing and homeless assistance programs. For 2019, the Mayor’s budget included \$9,800,000 for the Barnes Fund with applications due on April 2, 2019. The 2019 budget included \$598,600 for homeless services programs for assessment and intervention services for homeless individuals and those at risk of becoming homeless so they can obtain or maintain permanent supportive housing and a little over \$2 million to fund the former Metro Homelessness Commission, now the Nashville-Davidson Homelessness Continuum of Care Planning Council and its programs. Additionally, plans are in the works to use \$25,000,000 in General Obligation Bonds to construct a new homeless services center with a minimum of 100 new units of permanent supportive housing.

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

Leverage

MDHA attempts to use federal funds to leverage additional resources in several ways. Except for homeowner rehab assistance, applications for funding should demonstrate the ability to leverage funds. This is part of the Financial Capacity evaluation criteria for requests for proposals/applications. MDHA's grant writer researches federal, state, local, and private funding opportunities to apply for funds that further MDHA's mission based on the priorities established in the Consolidated Plan and Public Housing Plan.

To leverage HOME dollars, MDHA continues efforts to fund projects that leverage other resources for affordable housing development. For example, recently funded projects leveraged funds from U.S. HUD/SHOP Grant, Federal Home Loan Bank AHP funds, private funds from corporations, foundations, churches, and individuals. Additionally, the Barnes Fund, Metro's local Housing Trust Fund, makes funds available that are used to leverage HOME dollars. Another opportunity to leverage HOME funds is with Low Income Housing Tax Credits (LIHTC). MDHA actively pursues other funding opportunities to leverage HOME and CDBG funds to create affordable housing through the Community Reinvestment Act (CRA), HUD-insured loans, the Rental Assistance Demonstration (RAD) program, and the State Housing Trust Fund (HFT). Where appropriate, leverage may be achieved through supportive services provided by partners.

Match Requirements

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

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

CoC funds must be matched 25% by funding from other eligible sources. An array of sources are expected to be leveraged to meet this match, depending on the project and the administering agency – from the value of primary care and pharmacy services to residents living in permanent supportive housing, to private donations that assist with operating costs, to federal and state funds that help further CoC planning activities.

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

MDHA is currently reviewing its inventory of property to create a plan for development or disposition. Metro has established a Community Land Trust to acquire property and preserve it for long-term affordability. Additionally, Metro is making properties available to nonprofit partners to be utilized in conjunction with affordable housing projects utilizing Barnes Housing Trust funds; applications for the projects are due April 2, 2019.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	New Affordable Housing Opportunities	2019	2020	Affordable Housing Non-Housing Community Development	Countywide Housing Target Areas	Construct New Affordable Housing Address Housing Barriers	CDBG: \$26,072 HOME: \$2,405,039.40	Public service activities other than Low/Moderate Income Housing Benefit: 150 Persons Assisted Rental units constructed: 53 Household Housing Unit Homeowner Housing Added: 6 Household Housing Unit
2	Affordable Housing Preservation	2019	2020	Affordable Housing Public Housing Non-Housing Community Development	Countywide Napier-Sudekum CNI Planning Area Housing Target Areas	Retain Affordable Housing Stock Maintain Housing Stability	CDBG: \$2,680,485	Homeowner Housing Rehabilitated: 183 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
3	Support for Homeless & Persons with HIV/AIDS	2019	2020	Homeless Non-Homeless Special Needs	Countywide Metropolitan Statistical Area	Assist Homeless Persons & Persons with HIV/AIDS	CDBG: \$175,511 HOPWA: \$1,332,530.71 ESG: \$399,931.15	Tenant-based rental assistance / Rapid Rehousing: 325 Households Assisted Homeless Person Overnight Shelter: 2000 Persons Assisted Homelessness Prevention: 75 Persons Assisted HIV/AIDS Housing Assistance: 68 Household Housing Unit Other: 2845 Other

4	Self-sufficiency Opportunities	2018	2023	Public Housing Non-Housing Community Development	Countywide CDBG Target Areas Napier-Sudekum CNI Planning Area	Create Economic Opportunities for LMI Persons Support Youth Programs	CDBG: \$509,761	Public service activities other than Low/Moderate Income Housing Benefit: 1320 Persons Assisted Other: 1 Other
5	Neighborhood Revitalization	2018	2023	Non-Housing Community Development	Napier-Sudekum CNI Planning Area CDBG Target Areas	Invest in Underserved Areas	CDBG: \$898,019	Other: 4 Other
6	Administration and Planning	2018	2023	Affordable Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	Countywide Metropolitan Statistical Area Napier-Sudekum CNI Planning Area CDBG Target Areas Housing Target Areas	Provide Oversight and Management of Grants	CDBG: \$1,072,711 HOPWA: \$41,212.29 HOME: \$267,226.60 ESG: \$32,426.85	Other: 4 Other

Table 57 – Goals Summary

Goal Descriptions

1	Goal Name	New Affordable Housing Opportunities
	Goal Description	Increase the number of decent, safe affordable units and help LMI households access affordable housing.
2	Goal Name	Affordable Housing Preservation
	Goal Description	Preserve existing affordable housing units and help LMI tenants and homeowners retain housing.
3	Goal Name	Support for Homeless & Persons with HIV/AIDS
	Goal Description	Support facilities and services for homeless persons and persons with HIV/AIDS.
4	Goal Name	Self-sufficiency Opportunities
	Goal Description	Create pathways to self-sufficiency for LMI persons and families.
5	Goal Name	Neighborhood Revitalization
	Goal Description	Revitalize distressed neighborhoods and underserved areas.
6	Goal Name	Administration and Planning
	Goal Description	Undertake grant management, planning, and other eligible administrative tasks authorized under CDBG, HOME, ESG, and HOPWA.

Projects

AP-35 Projects – 91.220(d)

Introduction

The following are proposed projects to be undertaken during the 2019 program year or utilizing 2019 allocations.

Projects	
#	Project Name
1	CDBG Administration & Planning
2	CDBG Targeted Rehab (Napier-Sudekum Choice Planning Area)
3	CDBG Homeowner Rehab (CDBG Target Area)
4	CDBG Weatherization Assistance
5	CDBG HVAC Replacement
6	CDBG Roof Replacement
7	CDBG Accessibility Rehab
8	CDBG Rental Rehab
9	CDBG Housing Services
10	CDBG Housing Program Delivery
11	CDBG Summer Youth Programs
12	CDBG Youth Employment Programs
13	CDBG Housing Assistance for the Homeless
14	CDBG Renter Counseling Services
15	CDBG Fair Housing Services
16	CDBG Employment Services
17	CDBG Public Service Program Delivery
18	CDBG Microenterprise Assistance
19	CDBG Public Facilities and Improvements
20	CDBG Public Facility Program Delivery
21	HOME Administration
22	HOME New Construction - Rental
23	HOME New Construction - Ownership
24	HOME New Nonprofit Partner Set-Aside
25	HOPWA Housing and Supportive Services
26	ESG Programs and Services

Table 58 - Project Information

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

Funding priorities for the 2019 Action Plan are the same as those in the 2018 – 2023 Consolidated Plan.

Not only are funding priorities intended to address underserved needs as identified in the needs assessment and through public input, they are designed for implementation to be feasible and to be effective.

AP-38 Project Summary

Project Summary Information

1	Project Name	CDBG Administration & Planning
	Target Area	Countywide
	Goals Supported	Administration and Planning
	Needs Addressed	Provide Oversight and Management of Grants
	Funding	CDBG: \$1,072,711.00 (\$1,022,711.00 Grant + \$50,000.00 PI)
	Description	Funding to be used for oversight and administration of CDBG programs, including monitoring, reporting, program evaluation, fair housing activities, and the development of the Consolidated Plan and annual updates and amendments. Planning includes studies, analysis, data gathering, and preparation of plans.
	Target Date	5/31/2020
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	Countywide
2	Planned Activities	Funds to be used by MDHA as the lead agency for the development and administration of the Consolidated Plan. Administrative activities include grant management, monitoring, budgeting, and planning and executing CDBG-eligible activities. MDHA may choose to partner with another entity to undertake eligible planning activities. Funding for this activity is capped at 20% of the annual CDBG allocation plus 20% of program income.
	Project Name	CDBG Targeted Rehab (Napier-Sudekum CNI Planning Area)
	Target Area	Napier-Sudekum CNI Planning Area
	Goals Supported	Affordable Housing Preservation
	Needs Addressed	Retain Affordable Housing Stock
	Funding	CDBG: \$75,076.00 (71,576.00 Grant + \$3,500.00 PI)
	Description	Multi-component rehabilitation of owner-occupied homes in the Napier-Sudekum CNI Planning Area.

	Target Date	9/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	3 owner/occupied units in the designated area.
	Location Description	Napier-Sudekum CNI Planning Area
	Planned Activities	<p>Assistance will be provided in the form of forgivable loans for elderly (age 62+) homeowners. Assistance to other homeowners will be provided in the form of deferred (due on sale) loans. Repairs or improvements will be limited to items that address health and safety needs, such as heat/air, roof repair, plumbing, electrical, and accessibility.</p> <p>Priority will be given to homeowners whose incomes are at or below 50% AMI, persons with disabilities, and the elderly (age 62+). This program will be administered directly by MDHA and/or contracted out.</p> <p>Homeowners may apply during the open application period, and funds will be allocated on a first-come, first-serve basis to eligible households until funding is exhausted.</p>
3	Project Name	CDBG Homeowner Rehab
	Target Area	Housing Target Areas (Preference will be given to projects located in Housing Target Areas, but assistance may be provided Countywide if there is not sufficient interest in Housing Target Areas.)
	Goals Supported	Affordable Housing Preservation
	Needs Addressed	Retain Affordable Housing Stock
	Funding	CDBG: \$1,101,349.00 (\$1,049,075.00 Grant + \$52,274.00 PI)
	Description	Multi-component rehabilitation of homes occupied by LMI families, targeted to homes within Housing Target Areas.
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	50 units owned and occupied by persons with incomes at or below 80% AMI

	Location Description	Metro Council Districts experiencing high housing costs due to increases in property values and loss of (or are at risk of losing) affordable housing due to economic pressure.
	Planned Activities	<p>Assistance will be provided in the form of forgivable loans for elderly (age 62+) homeowners. Assistance to other homeowners will be provided in the form of deferred (due on sale) loans. Repairs or improvements will be limited to items that address health and safety needs, such as heat/air, roof repair, plumbing, electrical, accessibility and aging in place.</p> <p>Priority will be given to homeowners whose incomes are at or below 50% AMI, persons with disabilities, and the elderly (age 62+). This program will be administered directly by MDHA and/or via a contracted partner.</p> <p>Homeowners may apply during the open application period, and funds will be allocated on a first-come, first-serve basis to eligible households until funding is exhausted.</p>
4	Project Name	CDBG Weatherization Assistance
	Target Area	Countywide
	Goals Supported	Affordable Housing Preservation
	Needs Addressed	Retain Affordable Housing Stock
	Funding	CDBG: \$150,511.00 (\$143,152.00 Grant + \$7,359.00 PI)
	Description	Installation of weatherization measures in owner-occupied units in conjunction with assistance received through the U.S. Department of Energy's Weatherization Assistance Program (WAP) and/or NES Home Uplift Program.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	15 units owned and occupied by households with incomes 200% of the State of Tennessee poverty level or less. Funding is used in conjunction with the DOE WAP and/or NES Home Uplift Program, and households must be approved to receive assistance through these programs.
	Location Description	Countywide

5	Planned Activities	<p>CDBG funds will be used to supplement health and safety needs identified in an energy audit of each home receiving WAP and/or Home Uplift assistance. CDBG funds allow improvements to increase the efficient use of energy in structures through such means as installation of storm windows and doors, siding, wall and attic insulation, and conservations modifications, or replacement of heating and cooling equipment, including the use of solar energy equipment. Homes built prior to 1978 will have a lead based paint evaluation.</p> <p>Assistance will be treated as a grant to eligible homeowners. Priority will be given to households in accordance with WAP and/or Home Uplift program guidelines. This program will be administered by MDHA and/or via contracted partners.</p> <p>Homeowners must apply through the DOE Weatherization Assistance Program and/or the NES Home Uplift program.</p>
	Project Name	CDBG Roof Replacement
	Target Area	Countywide
	Goals Supported	Affordable Housing Preservation
	Needs Addressed	Retain Affordable Housing Stock
	Funding	CDBG: \$300,303.00 (\$286,303.00 Grant + \$14,000.00 PI)
	Description	Repair and/or replacement of roofs and components integral to roof replacement and preservation, including but not limited to, fascia/soffit, gutters/downspouts, tree/limb removal, etc. in homes owned and occupied by LMI households.
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	30 units owned and occupied by LMI households (\leq 80% AMI).
	Location Description	Countywide

	Planned Activities	Repair and/or replacement of roofs in homes owned and occupied by LMI households. Assistance will be provided in the form of forgivable loans for elderly (age 62+) homeowners. Assistance to other homeowners will be provided in the form of deferred (due on sale) loans. Homeowners may apply during the open application period or be referred to the program through the regular CDBG Homeowner Rehab Program. Funds will be allocated on a first-come, first-serve basis to eligible households until funding is exhausted. This program will be administered by MDHA and/or via contracted partners.
6	Project Name	CDBG Accessibility Rehabilitation
	Target Area	Countywide
	Goals Supported	Affordable Housing Preservation
	Needs Addressed	Retain Affordable Housing Stock
	Funding	CDBG: \$201,243.00 (\$193,743.00 Grant + \$7,500.00 PI)
	Description	Installation of accessibility improvements for handicapped or disabled households in homes owned and occupied by LMI households.
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	40 units owned and occupied by LMI households (\leq 80% AMI).
	Location Description	Countywide
	Planned Activities	Installation of accessibility improvements for elderly (62+) and/or disabled households. Assistance will be treated as a grant to eligible homeowners. Homeowners may apply during the open application period or be referred to the program through the regular CDBG Homeowner Rehab Program. Funds will be allocated on a first-come, first-serve basis to eligible households until funding is exhausted. This program will be administered by MDHA and/or via contracted partners.
7	Project Name	CDBG HVAC Replacement
	Target Area	Countywide

	Goals Supported	Affordable Housing Preservation
	Needs Addressed	Retain Affordable Housing Stock
	Funding	CDBG: \$300,303.00 (\$286,303.00 Grant + \$14,000.00 PI)
	Description	Installation of new HVAC systems or replacement of nonfunctioning HVAC units in homes owned and occupied by LMI households who are not receiving assistance through the CDBG Weatherization Program.
	Target Date	9/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	45 units owned and occupied by LMI households (\leq 80% AMI) who are not receiving assistance through the CDBG Weatherization and/or Home Uplift Programs.
	Location Description	Countywide
	Planned Activities	Installation of new HVAC systems or replacement of nonfunctioning HVAC units. Assistance will be treated as a grant to eligible homeowners. Homeowners may apply during the open application period or be referred to the program through the Regular CDBG Homeowner Rehab or Weatherization and/or Home Uplift Programs. Funds will be allocated on a first-come, first-serve basis to eligible households until funding is exhausted. This program will be administered by MDHA and/or via contracted partners.
8	Project Name	CDBG Rental Rehab
	Target Area	Housing Target Areas (Preference will be given to projects located in Housing Target Areas, but assistance may be provided Countywide if there is not sufficient interest in Housing Target Areas.)
	Goals Supported	Affordable Housing Preservation
	Needs Addressed	Retain Affordable Housing Stock
	Funding	CDBG: \$00.00 (Funded in PY2018; underway in PY 2019)
	Description	Rehab of existing units to be occupied by LMI (\leq 80% AMI) families.
	Target Date	9/30/2020

	Estimate the number and type of families that will benefit from the proposed activities	13 LMI households ($\leq 80\%$ AMI) – prior year funds
	Location Description	Metro Council Districts experiencing loss or are at-risk of losing affordable housing.
	Planned Activities	<p>Assistance will be provided to qualified landlords or developers on a first-come, first-approved basis until funding is exhausted to rehabilitate vacant, substandard rental property to lease to tenants with incomes at or below 80% AMI.</p> <p>Rehabilitation of occupied units may be considered on a case-by-case basis if the extent of the rehabilitation does not require permanent relocation of existing tenants. Projects that would require the permanent displacement of existing residents will not be eligible for funding. Funds may also be used for relocation assistance as needed.</p> <p>Assistance will be provided in the form of a forgivable loan if a landlord agrees to make units available exclusively for Voucher holders (Section 8, VASH, etc.); otherwise, assistance will be as a low-interest loan.</p> <p>All units must remain affordable and be leased to income-eligible tenants for a minimum of 10 years. This program will be administered by MDHA and/or via contracted partners.</p>
9	Project Name	CDBG Housing Delivery Costs
	Target Area	Countywide
	Goals Supported	Affordable Housing Preservation
	Needs Addressed	Retain Affordable Housing Stock
	Funding	CDBG: \$501,547.00 (\$479,047.00 Grant + \$22,500.00 PI)
	Description	Activity delivery costs associated with carrying out CDBG-eligible housing activities.
	Target Date	9/30/2020

	Estimate the number and type of families that will benefit from the proposed activities	N/A. Accomplishments are tied to specific CDBG housing activities.
	Location Description	Countywide Napier-Sudekum CNI Planning Area Housing Target Areas
	Planned Activities	Activity delivery costs incurred by MDHA or its contractors that are associated with the execution of the all CDBG Rehab (Homeowner and Rental) and Weatherization programs, such as reviewing and approving applications, making home inspections, preparing work-write ups, and inspecting projects through completion.
10	Project Name	CDBG Housing Services
	Target Area	Countywide
	Goals Supported	Affordable Housing Preservation
	Needs Addressed	Retain Affordable Housing Stock
	Funding	CDBG: \$50,153.00 (\$47,700.00 Grant + \$2,453.00 PI)
	Description	Activity delivery costs in support of the HOME Program.
	Target Date	9/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	N/A. Accomplishments are tied to specific HOME housing activities.
	Location Description	Countywide Napier-Sudekum CNI Planning Area Housing Target Areas
	Planned Activities	Costs are also associated with housing activities that are linked to providing services to owners, tenants, contractors, and other eligible entities participating in or seeking to participate in the HOME program.
11	Project Name	CDBG Summer Youth Programs
	Target Area	Countywide
	Goals Supported	Self-sufficiency Opportunities
	Needs Addressed	Support Youth Programs
	Funding	CDBG: \$325,767.00 (\$309,821.00 Grant + \$15,946.00 PI)

	Description	New or enhanced programs undertaken by nonprofit or public agencies that serve youth ages 6-18 from LMI families during the Summer of 2019.
	Target Date	7/31/2019
	Estimate the number and type of families that will benefit from the proposed activities	1200 youth ages 6-18 from families with incomes ≤ 80% AML.
	Location Description	Countywide, with encouragement to recruit children living in MDHA-owned public/affordable housing.
	Planned Activities	Programs must provide new or enhanced activities that will further participants' academic, artistic, and athletic interests, as well as promote job skills development and/or healthy lifestyles, to help prepare youth to become successful adults. Programs must operate between June 1 and July 31, 2019. Funding is awarded through a competitive process.
12	Project Name	CDBG Youth Employment Programs
	Target Area	Countywide
	Goals Supported	Self-sufficiency Opportunities
	Needs Addressed	Support Youth Programs
	Funding	CDBG: \$70,195.00 (\$66,770.00 Grant + \$3,425.00 PI)
	Description	Summer employment opportunities for youth ages 14-16 from LMI families offered by nonprofit and public agencies participating in Metro's Opportunity NOW program during the Summer of 2019.
	Target Date	7/31/2019
	Estimate the number and type of families that will benefit from the proposed activities	110 youth ages 14-16 from households with incomes ≤ 80% AML.
	Location Description	Countywide

	Planned Activities	Grants awarded to nonprofit and public agencies providing employment opportunities as part of Metro Government's "Opportunity NOW" work program that focuses on the need for employment and job training opportunities for youth ages 14 – 16. Programs include one week of training and six weeks of paid, project-based community improvement work. Examples of project-based work programs include community gardens, community art projects, and neighborhood cleanup projects, etc. Programs may begin on or before June 1 and must conclude by July 31, 2019. Funding is awarded through a competitive process.
13	Project Name	CDBG Housing Assistance for the Homeless
	Target Area	Countywide
	Goals Supported	Support for Homeless Persons and Persons with HIV/AIDS
	Needs Addressed	Assist Homeless Persons & Persons with HIV/AIDS
	Funding	CDBG: \$175,511.00 (\$166,925.00 Grant + \$8,586.00 PI)
	Description	Limited assistance of one-time emergency payments for rent and utility needs for homeless persons obtaining housing through the Metro Homeless Impact Division or utilizing MDHA Voucher programs (i.e., Shelter Plus Care, VASH).
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	150 persons
	Location Description	Countywide for homeless persons who need emergency assistance for housing placement in Davidson County.
14	Planned Activities	One-time emergency payments up to \$1000 per client to pay first month's rent and security and utility deposits for homeless persons obtaining housing through the Metro Homelessness Commission or utilizing MDHA Voucher programs (i.e., Shelter Plus Care, VASH). Payments are made directly to landlords and utility companies.
	Project Name	CDBG Renter Counseling Services
	Target Area	Housing Target Areas
	Goals Supported	Affordable Housing Preservation

	Needs Addressed	Maintain Housing Stability
	Funding	CDBG: \$0.00 (Funded in PY 2018; underway in PY 2019)
	Description	Counseling services provided to tenants of MDHA-owned public/affordable housing on tenant responsibilities to help them maintain housing stability.
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	125 residents of MDHA-owned public/affordable housing – with PY 2018 funds.
	Location Description	MDHA-owned properties in Housing Target Areas
	Planned Activities	Counseling program designed to equip residents with tools to become responsible tenants and good neighbors and to help mitigate potential or actual problems that could result in housing loss. Program should have a specific plan, strategy, and intervention t that has been shown to positively address housing loss prevention. Funding is awarded through a competitive process.
15	Project Name	CDBG Fair Housing Services
	Target Area	Countywide, with emphasis on Housing Target Areas
	Goals Supported	New Affordable Housing Opportunities Affordable Housing Preservation
	Needs Addressed	Address Housing Barriers Maintain Housing Stability
	Funding	CDBG: \$26,072.00 (\$24,796.00 Grant + \$1,276.00 PI)
	Description	Fair housing counseling, outreach, and education; conduct complaint-based testing.
	Target Date	9/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	150 persons from protected classes
	Location Description	Countywide, with an emphasis on assisting LMI residents in Housing Target Areas

16	Planned Activities	<p>Speaking with aggrieved individuals to inform them of their rights pertaining to Fair Housing and interacting with a potentially aggrieved individual's housing provider to determine the housing provider's version of the facts (i.e., investigation.); interacting with a housing provider to inform the housing provider of his or her obligations under applicable law, in order to bring relief to the aggrieved individual; providing legal representation to an aggrieved individual, either as a defendant or plaintiff in housing-related litigation; providing general education information to individuals to inform them of their rights in conjunction with the Fair Housing Laws; providing general educational information to individuals to inform them of their rights in conjunction with the Fair Housing Laws.</p> <p>Funding was awarded to a qualified nonprofit through a competitive process in PY 2018. PY 2019 funding will extend the 2018 award agreement.</p>
	Project Name	CDBG Employment Services
	Target Area	Housing Target Areas
	Goals Supported	Self-sufficiency Opportunities
	Needs Addressed	Create Economic Opportunities for LMI Persons
	Funding	CDBG: \$48,595.00 (\$46,320.00 Grant + \$2,275.00 PI)
	Description	Employment services to connect LMI persons to employment opportunities associated with housing construction and redevelopment projects undertaken by MDHA in Housing Target Areas, with the goal to provide Section 3 opportunities.
	Target Date	9/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	10 persons living in MDHA-owned subsidized housing
	Location Description	Housing construction/redevelopment projects undertaken by MDHA in Housing Target Area.

	Planned Activities	<p>Employment navigation services and/or soft skills job training to assist with increasing opportunities for potential Section 3 businesses or individuals to work on MDHA projects.</p> <p>The program started in PY 2018 and is being administered by MDHA; 2019 PY funds will fund the 2nd year of the program.</p>
17	Project Name	CDBG Public Service Program Delivery
	Target Area	Countywide
	Goals Supported	<p>Self-sufficiency Opportunities</p> <p>Affordable Housing Preservation</p> <p>New Affordable Housing Opportunities</p>
	Needs Addressed	<p>Summer Youth Programs</p> <p>Assist Homeless Persons & Persons with HIV/AIDS</p> <p>Create Economic Opportunities for LMI Persons</p> <p>Address Housing Barriers</p> <p>Maintain Housing Stability</p>
	Funding	CDBG: \$65,204.00 (\$62,015.00 Grant + \$3,189.00)
	Description	Delivery costs associated with CDBG public services activities
	Target Date	05/31/2020
	Estimate the number and type of families that will benefit from the proposed activities	Accomplishments will be tied to specific Public Services activities.
	Location Description	Countywide
	Planned Activities	Costs directly related to carrying out specific Public Services activities.
18	Project Name	CDBG Microenterprise Assistance
	Target Area	CDBG Target Areas
	Goals Supported	Self-sufficiency Opportunities
	Needs Addressed	Create Economic Opportunities for LMI Persons
	Funding	CDBG: \$0.00 (PY 2018 Funding included a 2-year agreement)
	Description	Microenterprise assistance to a commercial enterprise that has five or fewer employees, one or more of whom owns the enterprise and is LMI.

	Target Date	9/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	14 businesses – Prior Year Funds
	Location Description	Preference for businesses located in or will be located in CDBG Target Areas, with opportunities for businesses Countywide
	Planned Activities	<p>Microenterprise assistance for businesses that have five or fewer employees, one or more of whom owns the business and is LMI. An emphasis will be placed on women-owned businesses and business opportunities for public housing residents. Activities will include recruiting program participants; providing business and personal development training programs to qualified businesses/persons; providing individual consulting to participants for the development of business plans, loan applications and business problem-solving during and after start-up; facilitating access to business mentors or volunteers such as accountants or lawyers for the duration of the contract; advising and assisting participants concerning participation with existing trade associations, business networks, and lenders.</p> <p>Program will be administered through a contracted partner.</p>
19	Project Name	CDBG Public Facilities and Improvements
	Target Area	CDBG Target Areas Napier-Sudekum CNI Planning Area
	Goals Supported	Neighborhood Revitalization
	Needs Addressed	Invest in Underserved Areas
	Funding	CDBG: \$862,917.00 (\$822,917.00 CDBG + \$40,000.00 PI)
	Description	Construction or expansion of a neighborhood facility owned by a nonprofit or public agency or installation of infrastructure improvements (such as sidewalks or bus stops) in CDBG Target or Napier-Sudekum CNI Planning Areas
	Target Date	9/30/2021

	Estimate the number and type of families that will benefit from the proposed activities	3 projects
	Location Description	Projects will be located in and serve residents in either CDBG Target or Napier-Sudekum CNI Planning Areas
	Planned Activities	Costs include hard and soft costs, A&E costs. Maintenance/operations costs are not eligible. Projects will be identified through collaboration with Metro. Funds for public facilities may be used for Metro or MDHA-owned projects or awarded to qualified nonprofits.
20	Project Name	CDBG Public Facility Program Delivery
	Target Area	CDBG Target Areas Napier-Sudekum CNI Planning Area
	Goals Supported	Neighborhood Revitalization
	Needs Addressed	Invest in Underserved Areas
	Funding	CDBG: \$35,102.00 (\$33,385.00 CDBG + \$1,717 PI)
	Description	Delivery costs associated with CDBG public facility/infrastructure projects.
	Target Date	9/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	Accomplishments will be tied to specific public facility/infrastructure activities.
	Location Description	Projects will be located in and serve residents in either CDBG Target or Napier-Sudekum CNI Planning Areas
	Planned Activities	Costs directly related to carrying out specific public facility/infrastructure activities.
21	Project Name	HOME Administration
	Target Area	Countywide
	Goals Supported	New Affordable Housing Opportunities
	Needs Addressed	Construct New Affordable Housing
	Funding	HOME: \$267,226.60 (\$233,026.60 Grant + \$34,200.00 PI)
	Description	Provide grant management, compliance, and oversight of Home-funded activities.
	Target Date	5/31/2020

	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	Countywide
	Planned Activities	Administrative costs include staff and related costs for overall program management, coordination, monitoring, reporting, and evaluation. Administrative activities will be undertaken by MDHA.
22	Project Name	HOME New Construction – Rental
	Target Area	Countywide, with a preference for Housing Target Areas
	Goals Supported	New Affordable Housing Opportunities
	Needs Addressed	Construct New Affordable Housing
	Funding	HOME: \$1,870,586.20 (\$1,631,186.20 Grant + \$239,400.00 PI)
	Description	Funding for construction of new units for rent to households with incomes \leq 60% AMI.
	Target Date	5/31/2023
	Estimate the number and type of families that will benefit from the proposed activities	50 units (\leq 60% AMI), with priority for projects that benefit large families, persons with disabilities, and/or extremely low income tenants (0-30% AMI)
	Location Description	Preference will be given to projects located in Housing Target Areas, but projects may be built Countywide if there are no eligible projects proposed in Housing Target Areas.
	Planned Activities	<p>A minimum of 15% of the 2019 HOME allocation, estimated to be \$349,540, will be set-aside for eligible CHDO projects. The tenure of the CHDO projects will be based on developer demand and can come from the homeowner or rental project budgets.</p> <p>Additionally, MDHA may aside a minimum of \$500,000 for the redevelopment of MDHA-owned properties converted under RAD.</p> <p>For remaining funds, MDHA may award funds on a first-</p>

		<p>come, first –served basis through an open application cycle or on a competitive basis via a Request for Proposals development.</p> <p>Financial assistance to developers may be in the form predevelopment loans, construction loans, and permanent financing.</p> <p>Eligible uses of funds include acquisition, site preparation, construction, and soft costs. All new construction projects will be subject to underwriting by MDHA and must meet HOME Site and Neighborhood Standards.</p> <p>Units must be occupied by tenants with incomes at or below 60% AMI. In projects with 5 or more HOME-assisted units, at least 20% of the units must serve households at or below 50% AMI.</p> <p>Projects that would require the permanent displacement of existing residents will not be eligible for funding.</p>
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23	Project Name	HOME New Construction – Ownership
	Target Area	Countywide, with a preference for Housing Target Areas
	Goals Supported	New Affordable Housing Opportunities
	Needs Addressed	Construct New Affordable Housing
	Funding	HOME: \$267,226.60 (\$233,026.60 Grant + \$34,200.00 PI)
	Description	New construction for ownership and downpayment assistance in conjunction with the purchase of these homes by LMI households ($\leq 80\%$ AMI).
	Target Date	5/31/2023
	Estimate the number and type of families that will benefit from the proposed activities	6 homes ($\leq 80\%$ AMI), with priority given to projects that benefit large families.
	Location Description	Preference will be given to projects located in Housing Target Areas, but projects may be built Countywide if there are no eligible projects proposed in Housing Target Areas.
	Planned Activities	<p>A minimum of 15% of the 2019 HOME allocation, estimated to be \$349,540 will be set-aside for eligible CHDO projects. The tenure of the CHDO projects will be based on developer demand and can come from the homeowner or rental project budgets.</p> <p>Funding for the construction of new homes (including property acquisition costs), and downpayment assistance for eligible homebuyers to purchase these homes. All purchasers must receive/complete homebuyer education through a HUD or THDA approved education provider.</p> <p>MDHA may award funds on a competitive basis via a Request for Proposals or on a first come, first served basis through an open application cycle/RFP or undertake development.</p> <p>Projects that would require the permanent displacement of existing residents will not be eligible for funding.</p>

24	Project Name	HOME New Nonprofit Partner Set-Aside
	Target Area	Countywide, with a preference for Housing Target Areas
	Goals Supported	New Affordable Housing Opportunities
	Needs Addressed	Construct New Affordable Housing
	Funding	HOME: \$267,226.60 (\$233,026.60 Grant + \$34,200.00 PI)
	Description	Funding awarded to new nonprofit partners for construction of new properties, for rent to households with incomes \leq 60% AMI or new home construction and downpayment assistance for the purchase of these homes by LMI households (\leq 80% AMI).
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	3 units - Homeownership @ \leq 80% AMI or Rental @ \leq 60% AMI, with priority given to projects that benefit large families, persons with disabilities, and/or extremely low income families (0-30%)
	Location Description	Preference will be given to projects located in Housing Target Areas, but projects may be built Countywide if there are no eligible projects proposed in Housing Target Areas.
	Planned Activities	<p>For 2019, a set-aside of HOME funds to nonprofit developers who have not been awarded HOME funds in the last five years AND have completed the Barnes Fund Capacity Building program.</p> <p>Eligible applicants must have a shovel ready project and demonstrate their ability to develop successful affordable housing projects. Eligible activities for consideration include:</p> <ul style="list-style-type: none"> • New construction of rental housing • New construction of single-family homebuyer property and direct financial assistance for LMI buyer to purchase the home. • Allowable activities include acquisition, site preparation, construction, and soft costs. <p>An organization that is awarded funds through this Set-Aside will not be eligible to apply for the next two (2) years following completion of the funding year in which funds were awarded.</p>

		<p>MDHA may award funds on a first come, first served basis through an open application cycle or on a competitive basis via a Request for Applications (RFA).</p> <p>Funds not obligated under this activity within 1 ½ years of the applicable program year start date may be reallocated to Rental and Homeownership project budgets not subject to the set-aside requirement.</p> <p>The 1 ½ year time period does not apply to set-aside funds made available via an RFA process that aren't awarded due to lack of demand. Those funds may be allocated to other Rental and Homeownership projects seeking/receiving awards of funds via the same RFA process if funding requests are over-subscribed.</p> <p>Projects that would require the permanent displacement of existing residents will not be eligible for funding.</p>
25	Project Name	HOPWA Housing and Supportive Services
	Target Area	Metropolitan Statistical Area
	Goals Supported	Support for Homeless & Persons with HIV/AIDS
	Needs Addressed	Assist Homeless Persons & Persons with HIV/AIDS
	Funding	HOPWA: \$1,373,743.00
	Description	Housing; short-term rent, mortgage, and utility assistance (STRMU); supportive services for persons with HIV/AIDS and their families; program administrative costs incurred by MDHA and Sponsor agencies
	Target Date	5/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	<ul style="list-style-type: none"> -Facility Based Rental Assistance: 53 persons -STRMU: 275 persons -Supportive Services: 2,320 persons -Short-Term/Emergency Assistance – 15 persons
	Location Description	Persons with HIV/AIDS in the Nashville-Davidson—Murfreesboro-Franklin-MSA
	Planned Activities	<ul style="list-style-type: none"> • \$137,374.30 for <u>Administration</u> – \$41,212.29 retained by MDHA and \$96,162.01 to be awarded to Sponsor agencies • \$1,236,368.70 for the following eligible activities:

		<ul style="list-style-type: none"> ○ <u>Facility Based Rental/Housing Assistance</u>– costs associated with the rental subsidy assistance of clients in project-based rental units OR facility-based housing assistance costs for leasing a transitional/short-term housing facility/unit (ex-hotels/motels) ○ <u>STRMU</u> – reasonable rent and mortgage assistance payments that represent actual housing costs; assistance varies per client depending on funds available, tenant need, and program guidelines ○ <u>Tenant Based Rental Assistance</u> – costs associated with the placement of clients in permanent housing in the private rental housing market; assistance covers a portion of the rent based upon Fair Market Rent or “reasonable rent” and operates similar to the Section 8 Housing Choice Voucher Program. ○ <u>Supportive Services</u> - services including, but are not limited to, health, mental health assessments, permanent housing placement, drug and alcohol abuse treatment and counseling, day care, transportation assistance, employment assistance, personal assistance, nutritional services, intensive care when required, and assistance in gaining access to local, State, and Federal government benefits and services, except that health services may only be provided to individuals with acquired immunodeficiency syndrome or related diseases and not to family members of these individuals. Permanent Housing Placement assistance is also covered under Supportive Services. <p>All funds will be awarded to Sponsors selected for funding through an RFA to be issued in Spring 2019. Proposals will be evaluated by a Review Committee comprised of MDHA staff, representatives of programs that serve persons living with HIV/AIDS, or individuals that are knowledgeable about various aspects of housing services in accordance with the evaluation criteria contained in the RFA and ranked from highest to lowest. Funding will be awarded for projects according to their overall rank until funding is exhausted.</p>
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26	Project Name	ESG Programs and Services
	Target Area	Countywide
	Goals Supported	Support for Homeless Persons & Persons with HIV/AIDS
	Needs Addressed	Assist Homeless Persons & Persons with HIV/AIDS
	Funding	ESG: \$432,358
	Description	Activities to support homeless persons - rapid re-housing and homeless prevention assistance, shelter operations/essential services, and outreach; program and HMIS administration
	Target Date	5/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	<ul style="list-style-type: none"> -Rapid Re-housing: 325 persons -Homeless Prevention: 75 persons -Shelter Operations/Essential Services: 2,000 -Outreach: 100 persons
	Location Description	Countywide
	Planned Activities	<ul style="list-style-type: none"> • \$32,426.85 for <u>Administration</u> – retained by MDHA for general management, oversight, and coordination of ESG programs • \$21,617.90 for <u>HMIS</u> – retained by MDHA for costs associated with providing technical assistance and training, data review, input, and quality control for ESG subrecipients • \$378,313.25 for the following eligible activities: <ul style="list-style-type: none"> ○ <u>Rapid Re-housing Assistance</u> – includes, but is not limited to, utilities, rental application fees, security deposits, etc. and other eligible activities as defined in the ESG regulations at 24 CFR, §576.104; §576.105 (Housing relocation and stabilization services) and §576.106 (Short term and medium-term rental assistance) ○ <u>Homeless Prevention</u> includes, but is not limited to, rental assistance (such as arrears) and housing relocation and stabilization services, etc., and other eligible activities as defined in the ESG regulation at 24CFR, §576.103 ○ <u>Shelter Operations*</u> - include, but are not limited to, maintenance, rent, repair, etc., and other eligible activities as defined in ESG regulations at 24 CFR

		<p>§576.102(3)</p> <ul style="list-style-type: none"> ○ <u>Essential Services</u>* – include, but are not limited to, case management, childcare, education services, etc., and other eligible activities as defined in ESG regulations at 24 CFR, §576.102(1) ○ <u>Street Outreach</u>* – includes, but is not limited to, the cost of engagement, case management, emergency health and mental health, etc. and other eligible activities as defined in the ESG regulation at 24 CFR, §576-101 <p>*The total amount awarded for Shelter Operations, Essential Services, and Street Outreach cannot exceed \$259,414.80 (60% of the 2019 ESG Allocation).</p> <p>Funding for all activities, except Administration and HMIS, will be awarded to qualified nonprofits through a competitive process to be announced Spring 2019. Proposals will be evaluated by a Review Committee comprised of MDHA staff, representatives of programs that serve homeless persons, homeless or formerly homeless individuals or individuals that are knowledgeable about various aspects of the ESG program. Proposals will be evaluated in accordance with the evaluation criteria contained in the RFA and ranked from highest to lowest. Funding will be awarded for projects according to their overall rank until funding is exhausted.</p>
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AP-50 Geographic Distribution – 91.220(f)

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

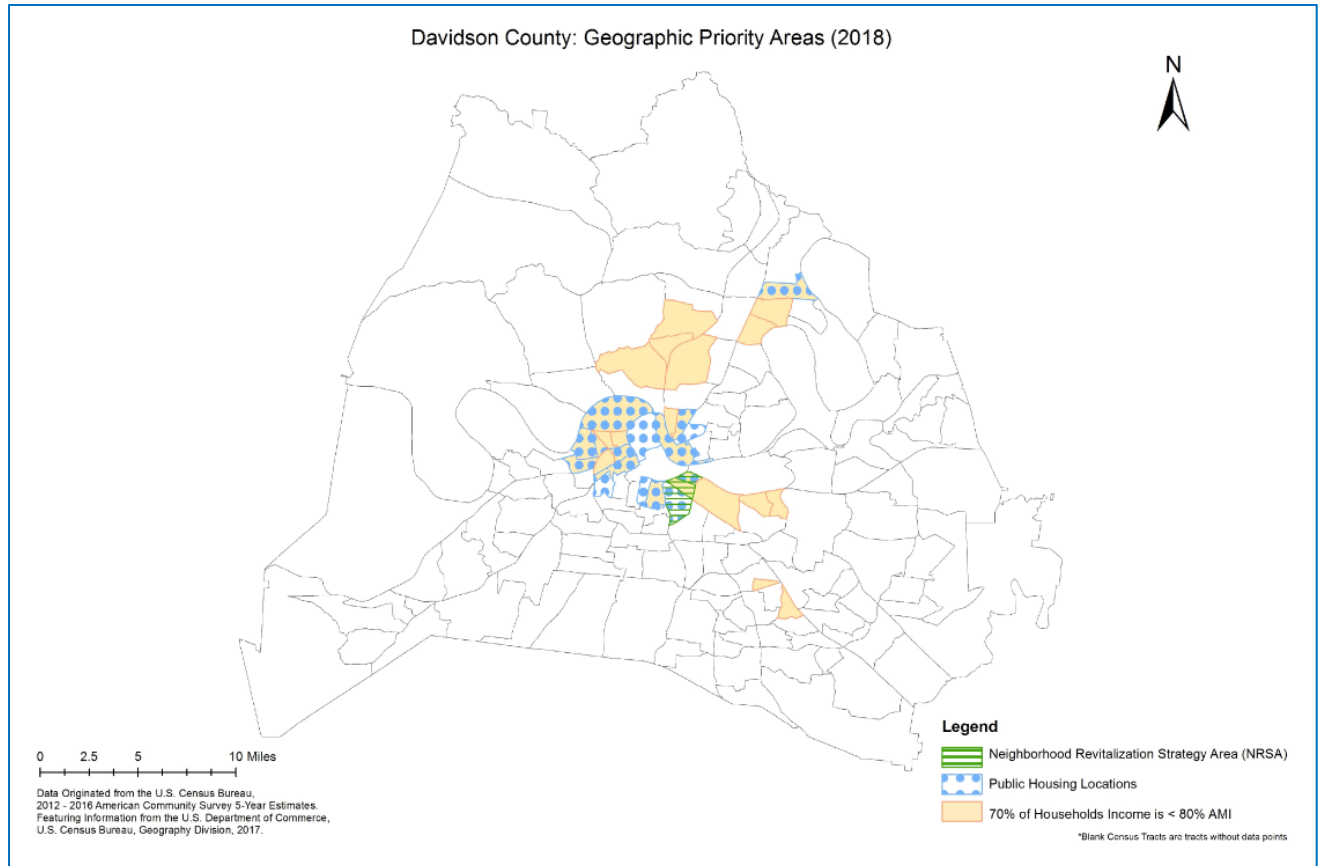
MDHA has established certain funds/activities in three designated areas in Davidson County: 1) CDBG Target Areas, 2) Napier-Sudekum Choice Neighborhoods Initiative (CNI) Planning Area, and 3) Housing Target Areas, as described below. For 2019, funding will be prioritized as follows. Remaining CDBG, ESG, and HOPWA funds will be deployed countywide, while HOPWA funds are used to assist persons with HIV/AIDS throughout the MSA.

Geographic Distribution

Target Area	Percentage of Funds
CDBG Target Areas	1%
Napier-Sudekum CNI Planning Area	1%
Housing Target Areas	22%

Table 59 - Geographic Distribution

The following maps show the CDBG Targeted Census Tracts and the Napier-Sudekum CNI Planning Area. In the first map, the shaded areas are CDBG Targeted Census Tracts. The green area is the Napier-Sudekum CNI Planning Area, which is shown separately in a subsequent map. Blue dots indicate Census tracts in which MDHA-owned public/affordable housing is located.



Geographic Priority Areas

1	Area Name:	CDBG Target Areas
	Area Type:	Local Target area
	Other Target Area Description:	N/A
	HUD Approval Date:	TBD
	% of Low/ Mod:	Target Areas are comprised of 26 Census tracts in Davidson County in which at least 70% of households in the Census tract have incomes ≤80% AML. The % of LMI households for each Census tract is provided in the subsequent table.
	Revital Type:	Comprehensive
	Other Revital Description:	N/A
	Identify the neighborhood boundaries for this target area.	See list of Census tracts that follows this table.
	Include specific housing and commercial characteristics of this target area.	There are 33,380 households in the 26 Census tracts. In addition, there are 13 MDHA-owned public/affordable housing properties in these areas.
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	The fair housing analysis conducted in 2017 identified Census tracts in Davidson County reflecting disparities in access to opportunity. These areas tend to be segregated by race or ethnicity and have high rates of poverty. There is a strong correlation between living in higher poverty areas and lower school performance, lower access to the labor market, greater reliance on public transportation, greater concentrations of public housing, and food deserts. When asked on the Survey conducted for this Plan, many respondents indicated these same areas.
	Identify the needs in this target area.	Needs that have been identified include sidewalks and parks; programs for youth; anti-poverty programs (such as financial literacy programs; workforce development/job training); and more retail/commercial options.

What are the opportunities for improvement in this target area?	<p>CDBG funds for public facilities and improvements, as well as microenterprise assistance will be targeted to these areas. Some of these areas may be in Housing Target Areas as well, where funds are targeted for homeowner and rental rehab of existing affordable housing, which add tools for revitalization.</p> <p>19 of the 26 Census tracts are in the Nashville Promise Zone.</p>
Are there barriers to improvement in this target area?	Limited availability of public funds and challenges in attracting private investment.

The following table lists the Census tracts in this targeted area. The table is sorted by the percentage of households with incomes under \$50,000 in descending order, with the largest percentage listed first. To determine the Census tract number for a property, see Exhibit 2.

Census Tract	Estimate; Total HH's:	HH's Under \$50,000	Percentage under \$50,000	Promise Zone	Council Districts	MDHA Sites
148	1001	945	94%	Subzone 3	19	Napier Place, Sudekum Apartments
193	1259	1153	92%	Subzone 1	5, 6	Cayce Place, Edgefield Manor
142	878	790	90%	Subzone 5	19, 21	Andrew Jackson Courts
139	679	606	89%	Subzone 5	21	
107.02	1750	1527	87%		7, 8	
159	1163	1012	87%	Subzone 3	19, 17	
136.02	146	124	85%	Subzone 5	21	Hadley Park Towers
136.01	1296	1099	85%	Subzone 5	21	Historic Preston Taylor Apartments, Hadley Park Towers
104.02	2363	1934	82%		9	Madison Towers
162	1384	1081	78%	Subzone 2	17, 19	Edgehill Homes, Gernert Studio Apartments
126	837	650	78%	Subzone 1	5	

160	410	318	78%	Subzone 3	17	
110.01	2169	1682	78%		2, 8	
118	1014	785	77%	Subzone 1	5	Levy Place
143	771	594	77%	Subzone 5	21	
137	2403	1838	76%	Subzone 5	2, 21	Cumberland View
158.04	2140	1617	76%	Subzone 3	13	
144	674	503	75%	Subzone 5	19, 21	J. Henry Hale Apartments
109.04	1250	922	74%		3	
127.01	2147	1575	73%	Subzone 5	2	
190.05	1229	897	73%	Subzone 4	26	
138	694	504	73%	Subzone 5	21	
191.08	1196	868	73%		30	
158.03	890	639	72%	Subzone 3	19, 15, 13	
107.01	1726	1217	71%		7, 8, 9	
109.03	1911	1345	70%		3,8	

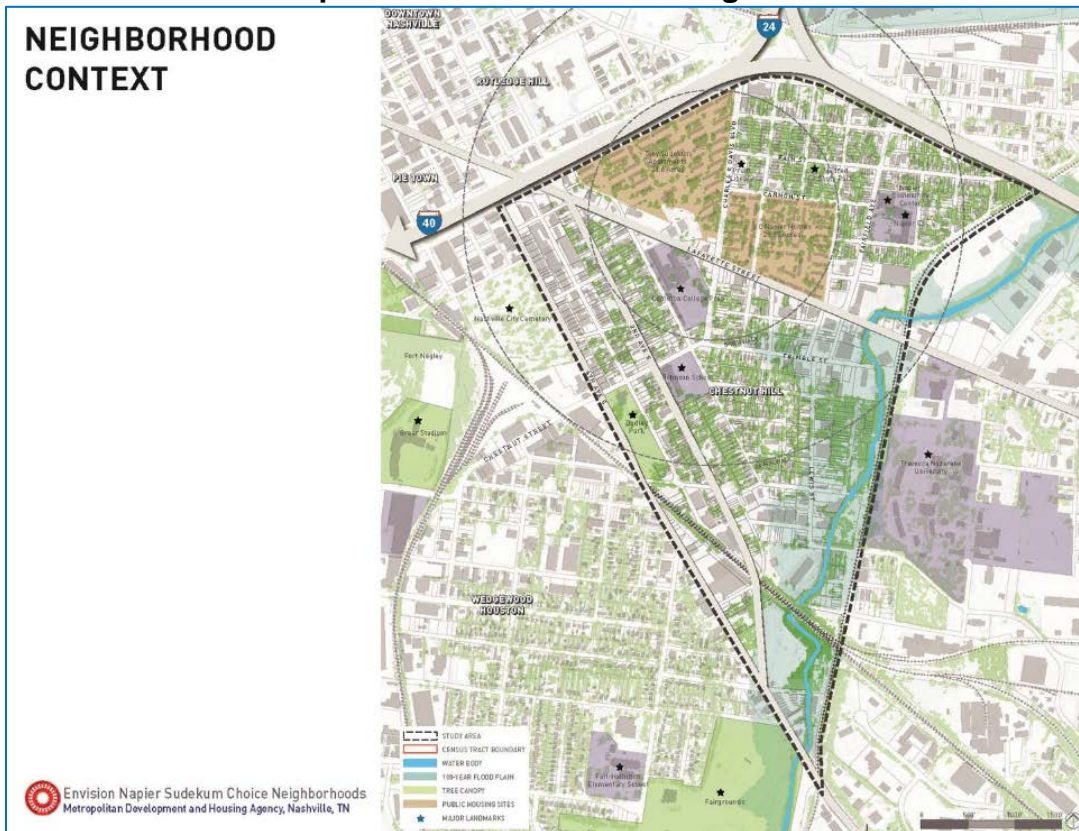
2	Area Name:	Napier-Sudekum CNI Planning Area
	Area Type:	Local Target area
	HUD Approval Date:	NRSA Application approved with the Consolidated Plan.
	% of Low/ Mod:	The targeted area's low to mod-income population includes over 70% of residents with income less than 80% AMI (72.24%).
	Revital Type:	Comprehensive
	Other Revital Description:	N/A
	Identify the neighborhood boundaries for this target area.	The boundaries are defined by Interstate 40 to the north and east, the railroad to the south, and 4 th Avenue to the west.
	Include specific housing and commercial characteristics of this target area.	The majority of the residential areas are located in the northern and western parts of the planned area. Light industrial properties are located on the southeaster side and commercial properties are located mostly along LaFayette Street and the northern side of 4 th Avenue. Napier Homes and Sudekum Apartments house most of the multi-family apartments and single family homes account for most of the remaining housing stock. Most of the commercial properties include retail, fast food and convenience stores.

<p>How did your consultation and citizen participation process help you to identify this neighborhood as a target area?</p>	<p>This area was selected as a target area and potential Neighborhood Revitalization Strategy Area (NRSA) due to its award of a \$500,000 Choice Neighborhoods Planning Grant in 2016 and its inclusion in the Nashville Promise Zone.</p> <p>The Choice Neighborhoods planning process, which launched in November 2016, has included twenty months of intense, community driven efforts to revitalize and redevelop the area. Multiple committees and work groups were formed to ensure maximum participation and engagement of the community leaders, stakeholders and residents. MDHA and the Design Team offered various opportunities for community involvement during the process and utilized multiple interactive charrettes and events to encourage residents to become a part of the planning. To date the process has included 9 Community Advisory Groups (CAG) meetings, 7 resident-only meetings, 7 town hall meetings, 34 work group sessions, and 3 community charrettes.</p>
<p>Identify the needs in this target area.</p>	<p>During a stakeholder consultation meeting, several areas of need were identified in the target area along with suggested project opportunities to create improvements in the area. They are detailed as follows:</p> <p><i>Public facilities</i> (e.g., community centers, parks) – There is no <u>real</u> public park in the immediate area of the community, only a pocket park. A 4-acre park in the center of the neighborhood is proposed and would include access to the existing public library. Also, a new community center is proposed for the area next to the park. With additional redevelopment plans for the area, the hope is to incentivize developers to build a new grocery store for the community to address the food desert concerns.</p> <p><i>Public improvements & infrastructure</i> (e.g., sidewalks, stormwater improvements) – All of the existing infrastructure in the community is outdated and needs updates to sidewalks, stormwater, etc. There is also possibility of a new</p>

	<p>street grid implementation to meet safety standards which will also require updated infrastructure activities.</p> <p><i>Public services</i> (e.g., healthy food initiatives, summer youth programs, youth employment opportunities) – With a new community center, daycare programs, summer youth programs, and healthy food classes could be incorporated into the communities services. There is also a need for employment services such as Section 3 job training and career navigation assistance. The goal is to provide Section 3 training on the front end to potential hires from the public housing community in the area. This includes job skill training and addressing barriers to hiring. Then, these trainees can be referenced to general contractors for preference when hiring for the many construction opportunities planned for the area.</p> <p><i>Economic development</i> (e.g., microenterprise assistance) – A potential self-sufficiency opportunity includes microenterprise assistance for small or start-up businesses that could locate in the area.</p> <p><i>Housing needs</i> - The areas around MDHA's property, particularly across Lafayette Street are already seeing the signs of gentrification. This is creating an even bigger lack of affordable housing in the immediate area of the community. Conversely, a number of dilapidated single family homes adjacent to Napier are in need of home rehab.</p>
<p>What are the opportunities for improvement in this target area?</p>	<p>The goal is to find ways to get ahead of the gentrification and try to preserve the affordable housing stock. If the NRSA application is approved, this could allow for low and middle income families to remain in the area and help preserve additional housing stock. Also, the leveraging of Barnes, CHDO, and other funds could encourage new affordable housing opportunities. The Promise Zone opens another potential avenue for resources to support revitalization efforts.</p>

	<p>The community vision includes a mixed income community that is intergenerational. It would be a community that would create opportunities for families to thrive via economic self-sufficiency, community safety, health and wellness, and education for all levels.</p> <p>Further details of specific activities are provided in the NRSA application that was submitted with the Consolidated Plan. The NRSA application will span the same 5 year timeframe as the new Consolidated Plan. However, if MDHA receives a Choice Neighborhoods Implementation Grant, the NRSA would extend through the term of that grant.</p>
<p>Are there barriers to improvement in this target area?</p>	<p>There is a general feeling that the community is cut off around Lafayette. According to stakeholders, there have been challenges in the past to provide upgrades to areas adjacent to MDHA's properties. The public library expansion helped (it has become the heart of the neighborhood), but local investment has been actually very limited. The other major upgrade was to Napier Elementary school – but that was 15 years ago. There is a general lack of awareness and disinterest.</p> <p>There is lack of vision to see the potential for the area. Most private investors in commercial space look for density – until they can see the density increase, there is no interest. There are a lot of negative perceptions regarding safety and crime in the area which make it undesirable for investors. If changes were made to the street facing business sites, it could make the area more appealing and attract private investment.</p> <p>Mobility and transportation are also issues. It is difficult to cross Lafayette safely – there are no crosswalks or sidewalks.</p>

Napier-Sudekum CNI Planning Area



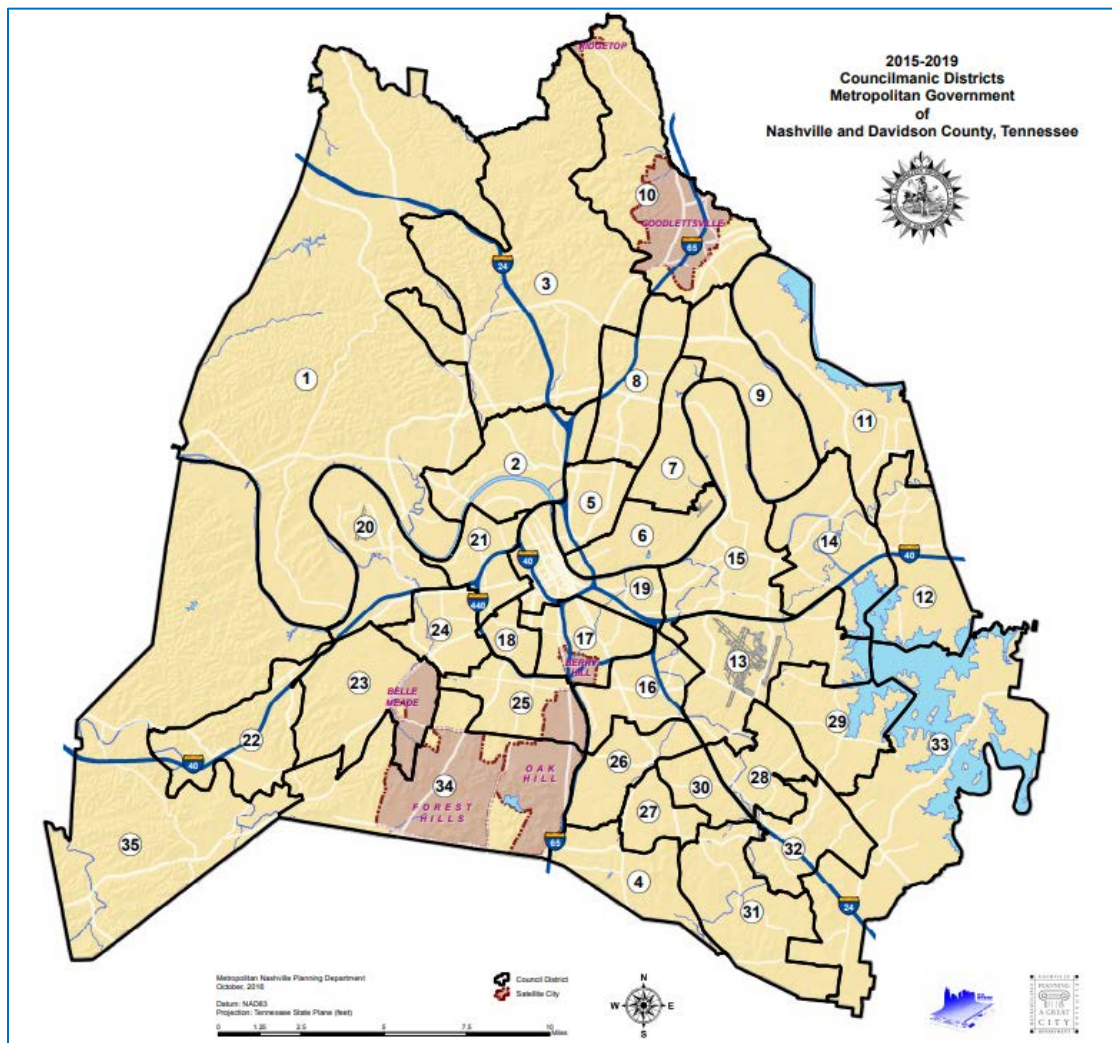
3	Area Name:	Housing Target Areas
	Area Type:	Metro Council Districts
	Other Target Area Description:	N/A
	HUD Approval Date:	TBD
	% of Low/ Mod:	
	Revital Type:	Housing
	Other Revital Description:	Housing preservation and new housing construction
	Identify the neighborhood boundaries for this target area.	14 Metro Council Districts listed in the next table as well as areas in which MDHA-owned public/affordable housing is located (blue dots on previous map).
	Include specific housing and commercial characteristics of this target area.	The 14 Council Districts in the Housing Target Area experienced at least a 40% increase in property values during the 2017 reappraisal. According to Metro's Open Data Portal, seven of the Districts are in the top 14 for Property Standards Violations (since 5/1/2015); 10 are in the top 14 for percentage of Building Permits Issued (since 5/1/2013); and seven are in the top 14 for Total Value of Permits.

	<p>22 MDHA-owned properties house over 5,000 units occupied by low-income households; seven of these are older, distressed properties in which MDHA plans to redevelop into mixed-income, mixed-use communities.</p>
<p>How did your consultation and citizen participation process help you to identify this neighborhood as a target area?</p>	<p>Input for the 2017 fair housing analysis as well as for this Plan expressed strong concern about the loss of affordable housing due to Nashville's growth, which is displacing residents from their homes. This input is substantiated by the <i>Housing Nashville Report</i>.</p> <p>Analyses and input also revealed the need for reducing concentrations of poverty as MDHA proposes for its sites.</p>
<p>Identify the needs in this target area.</p>	<p>Preserve existing affordable housing in gentrifying areas and create new affordable units.</p>
<p>What are the opportunities for improvement in this target area?</p>	<p>Local discussions on affordable housing have brought these needs into the spotlight, and more nonprofit and for-profit developers are interested in providing affordable housing.</p> <p>Master planning for four MDHA sites is complete (Cayce) or underway (Napier, Sudekum, and Edgehill); with MDHA's first mixed-income housing under construction and the second one breaking ground on May 10, 2018. MDHA will replace all public housing one-for-one while adding workforce (80-120%) and market rate units.</p>
<p>Are there barriers to improvement in this target area?</p>	<p>The primary challenges will be outreach and garnering participation in the homeowner and rental rehab programs. For new affordable housing, the challenge will be securing affordable land and financing.</p>

The table on the next page lists the 14 Metro Council Districts in the Housing Target Areas. Highlighted cells indicate that the respective District is among the top 14 in that category. Areas with MDHA properties are indicated on the map at the beginning of this section; some properties may be located within the target Council Districts.

District	% increase in Appraisals	Property Standards Violations	Property Standards Violations %	Building Permits Issued	Building Permits Issued %	Building Permits Issued with Value	Building Permits Issued with Value %	Total Value of Permits	Total Value of Permits %
5	93%	1070	4.59%	1719	4.66%	1714	4.67%	\$334,780,771.00	3.14%
21	77%	1136	4.87%	1651	4.48%	1638	4.46%	\$647,479,734.00	6.07%
7	66%	1087	4.66%	1683	4.57%	1678	4.57%	\$183,242,306.00	1.72%
19	63%	468	2.01%	3144	8.53%	3126	8.52%	\$3,268,170,236.00	30.64%
20	61%	545	2.34%	2655	7.20%	2653	7.23%	\$406,803,470.00	3.81%
17	55%	752	3.22%	2783	7.55%	2764	7.53%	\$578,407,990.00	5.42%
6	53%	1018	4.36%	1782	4.83%	1770	4.82%	\$278,377,843.00	2.61%
16	52%	1628	6.98%	947	2.57%	943	2.57%	\$141,388,851.00	1.33%
2	49%	659	2.82%	1249	3.39%	1237	3.37%	\$289,553,900.00	2.71%
30	45%	801	3.43%	257	0.70%	257	0.70%	\$17,039,594.00	0.16%
15	41%	670	2.87%	1031	2.80%	1030	2.81%	\$231,147,465.00	2.17%
27	41%	412	1.77%	416	1.13%	416	1.13%	\$89,628,634.00	0.84%
8	41%	1142	4.90%	634	1.72%	628	1.71%	\$60,120,710.00	0.56%
14	40%	646	2.77%	767	2.08%	766	2.09%	\$122,886,099.00	1.15%

For context, below is a map of Metro Council Districts.



Rationale for the priorities for allocating investments geographically

The basis for allocating investment geographically is twofold: (1) to bring investments to underserved or distressed neighborhoods; and (2) to create/preserve affordable housing in areas of opportunity with greater access to transportation, schools, services, and lower exposure to poverty. These are goals of the fair housing analysis as well as priority needs of this Plan.

In addition to targeting funds to certain geographical areas as described above, funds for housing programs are also prioritized for the following populations:

- Large families
- Persons with disabilities
- Elderly (age 62+)
- Very low-income households ($\leq 50\%$ AMI).

Housing for Persons with AIDS

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

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

One year goals established below reflect the utilization of CDBG, HOME, ESG, and HOPWA for affordable housing. Goals for emergency shelter, transitional shelter, or social/supportive services are not included.

One Year Goals for the Number of Households to be Supported	
Homeless (ESG - CDBG)	550
Non-Homeless (CDBG & HOME)	242
Special-Needs (HOPWA)	343
Total	1135

Table 60 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance (ESG & HOPWA)	893
The Production of New Units (HOME)	59
Rehab of Existing Units (CDBG)	183
Acquisition of Existing Units	0
Total	1135

Table 61 - One Year Goals for Affordable Housing by Support Type

AP-60 Public Housing – 91.220(h)

Introduction

MDHA will continue to undertake the redevelopment of its oldest former public housing into mixed-use, mixed-income communities.

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

As discussed in the Consolidated Plan, MDHA established a Neighborhood Revitalization Strategy Area (NRSA) at Napier-Sudekum. The boundary of the NRSA overlaps with the Choice Neighborhoods Planning area. The first proposed project for the NRSA was rehab for homeowners in the NRSA and this will continue in PY 2019. Additional projects include the following:

- A broadband infrastructure project dedicated to expanding broadband access in the Napier Place and Sudekum Apartments neighborhood through installation of a community WI-FI network that serves communal and open spaces at the neighborhood's core. This pilot will begin in two (2) neighborhood playground and picnic areas and community rooms adjacent to each property's management office. Located in Census Tract 148, Davidson County, TN. The targeted achievement for this project is to be out for bid in PY 2019.
- A street lighting project designed to increase community safety in the Napier Place and Sudekum Apartments neighborhood by using Crime Prevention Through Environmental Design (CPTED) principles to improve street lighting conditions and efficacy. Improved and increased street lighting is known to have a positive impact in the reduction of criminal activity and increases perceptions of community safety. Located in Census Tract 148, Davidson County, TN. The targeted achievement for this project is to have the planning phase underway by the end of PY 2019.

To support MDHA's redevelopment efforts, approximately \$500,000 of HOME funds will be used for new construction of mixed-income housing as part of an "Envision" initiative. The HOME-assisted units will be restricted to households with incomes ≤60% AMI. To connect residents to jobs associated with MDHA redevelopment efforts or Community Development projects and further Section 3 opportunities, CDBG will continue to be used to provide employment services.

To help public housing residents maintain housing stability, CDBG funds from PY 2018 are being used to provide renter counseling services.

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

MDHA provides a number of opportunities for residents to become more involved in management and to participate in homeownership programs:

- Two public housing residents are appointed to the 7 member MDHA Board of Commissioners.
- Each property has a resident association that actively engages the residents and coordinates activities with property management. The president of each resident association meets with MDHA leadership annually to review the PHA Annual Plan.
- At each monthly MDHA Board meeting, a property manager and a resident association president are invited to address the Board and provide updates on activities occurring at their properties and relay needs to the Board.
- MDHA's "Envision" process encourages residents to participate in the master planning process for their sites and specific meetings are held to obtain their input.
- MDHA's Affordable Housing Department and Rental Assistance Department offer self-sufficiency programs that create pathways to homeownership. On average, 10 residents/voucher-holders achieve homeownership through these programs.

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

Not applicable.

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

Introduction

This section describes the one-year goals and activities for the Nashville-Davidson County area to build a housing crisis resolution system. In July 2018, Nashville-Davidson County strengthened its homeless governance by merging two formerly separate structures- the Metropolitan Homelessness Commission, and the CoC Governance Board to form the Nashville-Davidson County Continuum of Care Homelessness Planning Council, which is empowered to make decisions and recommendations as the governance board for the Nashville-Davidson County Continuum of Care, as required by 24 CFR Part 578.

The Nashville-Davidson County Continuum of Care Homelessness Planning Council has the following duties and responsibilities:

1. To implement a coordinated and focused approach to ending homelessness and to develop measurable objectives via the creation of a strategic plan;
2. To fulfill all duties and responsibilities as the governance board for the Nashville-Davidson County Continuum of Care, including compliance with 24 CFR Part 578;
3. To hold regular meetings open to the public with published agendas;
4. To assure participation of all stakeholders, including persons experiencing homelessness;
5. To maintain accurate, current data on homeless populations; and
6. To educate the public, service providers, and other interested parties on issues related to homelessness. For information on specific homeless initiatives, visit the Homeless Impact Division (HID) web page <https://www.nashville.gov/Social-Services/Homeless-Impact-Division.aspx>.

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

- Finalize and begin implementing a 3-year strategic plan with clear priorities on how our community builds an effective Housing Crisis Resolution System, with specific action plans that outline/name who is responsible for implementation. This plan is anticipated to be complete by July 1, 2019.
- Improve coordination efforts among service providers through increased investment in HMIS.
- Invest in activities that lead people experiencing homelessness to permanent housing as quickly as possible while offering a variety of intervention options that

provide options to address the different needs.

- Use ESG funds to assist approximately 325 people with rapid rehousing and 75 with homeless prevention services; serve approximately 2,000 individuals via shelters and essential services; and touch approximately 100 individuals via street outreach.
- Use CDBG funds to assist approximately 150 homeless individuals with one-time, emergency payments to pay for first month's rent, security and utility deposits for housing being obtained via HID or utilizing MDHA Shelter Plus Care or VASH voucher programs.
- Work to assess and improve the community's system for addressing homelessness and building a housing crisis resolution system.
- Work to broaden the implementation of a Coordinated Entry System (CES) for the homeless and those at risk of homelessness.
- Continue to provide homelessness prevention and diversion services to those who are still housed.
- Continue to prioritize ESG prevention funds to assist persons with histories of homelessness.
- Continue to increase system capacity in outreach and housing navigation services.
- Work to increase permanent housing opportunities, linked to appropriate supports, for homeless veterans, chronic/vulnerable homeless persons, families and youth.
- Expand rapid rehousing opportunities for homeless youth & young adults (YYA), as well as create diversion options to avoid homelessness for this subpopulation.
- Work on the development of a new CES specifically for victims of domestic violence, as well as new rapid rehousing resources for this subpopulation, made possible via three new CoC bonus projects awarded by HUD to The Mary Parrish Center.
- Continue to address barriers to housing entry, such as, but not limited to, up-front housing costs like rent/utility deposits and first-month's rent, using available resources.

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

- Continue to expand and improve its education and information efforts to further implement the CES.
- Continue marketing efforts to ensure different populations know where the main entry points to services are.

- Continue to encourage the coordination between different street outreach groups. Continue to educate service providers so they know how to link and partner with trained housing navigators.
- Continue to expand efforts to connect people who experienced homelessness when they entered in institutions (hospitals, jail, mental health facilities, etc.) with housing navigators as part of their discharge planning to avoid people being released to the streets or shelters.
- Continue to provide CoC partners with information on available services to ensure that they have the resource to link people to available mainstream services and homeless-specific services.

Addressing the emergency shelter and transitional housing needs of homeless persons

The HID is dedicated to continual improvement of the CES to ensure people experiencing literal homelessness have immediate access to emergency shelter and, when appropriate, to transitional housing programs. While there seems to be sufficient emergency and transitional bed capacity, the community needs to evaluate appropriate referrals to fill the beds with people who need them the most in order to access a safe environment.

The following strategies will help address these needs:

- Develop a solid prevention and diversion effort;
- Quickly link people to emergency beds;
- Coordinate exit strategies that allow newly identified low-income affordable housing units to be filled with people who experience literal homelessness;
- Create an in-reach team to assist shelter providers with housing navigation and entering people into the CES;
- Improve data sharing to know how long people stay in shelter beds and where they go when leaving emergency shelters;
- Educate providers across the CoC on eligibility requirements for different transitional housing to promote appropriate referrals (ideally through the CES);
- Assist transitional housing providers to coordinate with other agencies when people leave their programs, so that they do not end up back in literal homelessness;
- Develop warm hand-off protocols to support people as they exit shelter and transitional housing beds;
- Link housing navigators with transitional housing providers to assist in the housing search coordination if needed;

- Share housing resources/destination information and eligibility criteria to provide people in emergency shelters and transitional housing with options;
- Continue to evaluate innovative approaches such as developing bridge housing, navigation centers, safe havens, service centers, night centers, etc. to address the needs of people who identify themselves as shelter-resistant.

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

- Link people with available housing opportunities as quickly as possible and support them in accessing subsidies and increasing their income to help them sustain their housing long-term.
- Build a diversion program with resources to identify and work with families who were recently homeless to prevent them from becoming homeless again.
- Continue to use CDBG funds to cover one-time move-in costs (security and utility deposits and first month's rent) for households experiencing literal homelessness.
- Identify flex funding to assist with other move-in costs, including arrears that keep people out of housing, including but not limited to pet deposits, application fees, pro-rated rent, furniture, etc.
- Explore funding opportunities to increase services for people transitioning from literal homelessness to permanent housing and deploy a progressive engagement approach to start with the least intervention level and increase it as needed.
- Work with public agencies, private and nonprofit developers to explore opportunities to build affordable housing and permanent supportive housing units.
- Develop a plan and advocate for landlord incentive programs such as a mitigation fund, move-in cost assistance similar to the Veterans incentive program implemented by a partnership between the Mayor's Office and MDHA.
- Support the continued partnership between MDHA and the Metropolitan Homeless Impact Division that allows for up to 18 housing choice vouchers per month to be dedicated to the CES to aide households experiencing literal homelessness with access to permanent housing.

- Strengthen the ongoing landlord outreach process by improved coordination between the city and service providers who search for housing opportunities for their clients.
- Develop solid By Name Lists for families, Veterans, YYA, and individuals experiencing literal homelessness with a preference for housing given to people experiencing long-term (chronic) homelessness.
- Continue the Community Mental Health Systems Improvement (CMHSI) efforts to bring together partners from the health, mental health, criminal justice and homeless systems to improve coordination for the most vulnerable populations and link them with stable housing by ensuring they are aware of available of local, state and government homeless funding sources to support the housing needs of this population.

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

- Increased systems coordination and education of discharge personnel at different institutions with discharge procedures in place to prevent homelessness upon discharge, i.e., Foster Care, Mental health, Physical health and Criminal Justice and Correctional systems to identify people at risk of homelessness and link them with supports to prevent them from becoming literally homeless after discharge;
- Improved cross-sector approaches and coordination between, hospital and health care providers and our local criminal justice system starting with a focus on people with mental health diagnoses.
- Improved coordination with the state Department of Children Services and support them in their effort to expand services for youth existing foster care with a focus on prevention efforts;

AP-70 HOPWA Goals - 91.220 (I)(3)

One year goals for the number of households to be provided housing through the use of HOPWA for:	
Short-term rent, mortgage, and utility assistance payments	275
Tenant -Based Rental Assistance	0
Units provided in permanent housing facilities developed, leased, or operated with HOPWA	53
Units provided in transitional short-term housing facilities developed, leased, or operated with HOPWA funds	15
Total	343

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

Introduction:

Overcoming the City's affordable housing crisis requires attacking the problem on multiple fronts and addressing a number of challenges that negatively impact the creation and/or preservation of affordable housing.

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

Barrier	Proposed Action
Availability and cost of land	<ul style="list-style-type: none">• Utilize public land for affordable housing development.• Allow acquisition to be used as an eligible expense of HOME and Barnes Funds.• Create a Community Land Trust to acquire and preserve property.
Lack of mandatory inclusionary zoning	<ul style="list-style-type: none">• Encourage private developers to construct affordable housing in the urban core and along major corridors through incentives, such as the Housing Incentives Pilot Program (HIPP).
Zoning/density requirements	<ul style="list-style-type: none">• Provide density bonuses for affordable housing.
Property taxes	<ul style="list-style-type: none">• Publicize tax relief/abatement programs such as payments in lieu of taxes (PILOT) for tax credit projects; property tax exemption benefits for affordable housing provided to low income persons with disabilities or elderly that is financed by HOME and other eligible sources (as provided in T.C.A. 67-5-207); and Metro's Tax Freeze program for low income homeowners.
Scarcity of funding	<ul style="list-style-type: none">• Leverage public funds to create more

	units. <ul style="list-style-type: none"> • Continue to fund the Barnes Fund. • Explore public/private partnerships.
Prohibition on local hire requirements	<ul style="list-style-type: none"> • Increase Section 3 participation in HUD-funded construction projects through outreach and job training programs.
Negative perception (NIMBYism)	<ul style="list-style-type: none"> • Develop a public awareness campaign to combat NIMBYism.
Housing discrimination	<ul style="list-style-type: none"> • Educate residents as well as the industry on fair housing rights and responsibilities.
Criminal history	<ul style="list-style-type: none"> • Establish flexible admission policies for persons with a criminal history. • Consider actual conviction history rather than criminal affidavits or arrest records. • Support re-entry and diversion programs.
Credit challenges.	<ul style="list-style-type: none"> • Promote financial counseling/literacy programs.

AP-85 Other Actions – 91.220(k)

Actions planned to address obstacles to meeting underserved needs

- Invest in geographic priority areas for community development, targeting CDBG funds for public facilities and improvements and economic development to areas with high concentrations of poverty – where investment is needed most.
- Continue to offer CDBG assistance for rental rehab as a grant to landlords who agree to rent to voucher-holders to facilitate more inventory.
- Using CDBG funds to provide grants to LMI homeowners for the installation of accessibility improvements for disabled households.
- Continue to generate interest and involvement in the Promise Zone.
- Provide broadband access infrastructure for low income residents in the NRSA target areas.

Actions planned to foster and maintain affordable housing

- Help the very low income and formerly homeless maintain housing stability by:
 - continuing to work to develop and maintain a listing of landlords who have accepted subsidies and have worked with service providers who assist people with behavioral issues;
 - continue to work on creating a training plan for housing navigators and other service providers on how to engage positively with landlords and speak the same language (business-oriented approaches);
 - offer rental housing counseling services to MDHA residents and/or families/individuals approved to lease MDHA units.
- Partner with District Council members and neighborhood groups to reach out to homeowners in need of rehabilitation assistance.
- Actively pursue other funding mechanisms and partnerships for the development of affordable housing to leverage limited public dollars.
- Continue to participate in PolicyLink's All-in Cities Anti-Displacement Policy Network so Nashville will be equipped with data, policy ideas and best practices that will lead to the strategic development and tracking of solutions to displacement to ensure that Nashville's neighborhoods continue to thrive.

Actions planned to reduce lead-based paint hazards

- Implement housing related activities in accordance with all applicable HUD, EPA, and State of Tennessee regulations.

- Provide all rehab clients and potential clients with the “Lead- Based Paint” pamphlet that describes hazards of lead-based paint. Pursuant to 24 CFR Part 35, all rental and homeowner dwelling units that wish to receive federal assistance and were built prior to 1978 are tested for lead-based paint. (These tests consist of visual inspections, lead screens, and full assessments. Additionally, when properties test positive for LPB hazards, interim controls are performed and LBP clearances are provided.)
- Address lead- based paint hazards as part of the home rehab programs and rehab of shelters and community centers.

Actions planned to reduce the number of poverty-level families

- Provide assistance to microenterprises in targeted areas to foster small business development in underserved communities.
- Provide employment and enrichment opportunities to youth during the summer months that provide constructive outlets and illuminate paths out of generational poverty.
- Connect low income persons to job opportunities associated with MDHA development projects.

Actions planned to develop institutional structure

- Provide training and technical assistance to subrecipients.
- Streamline procurement process.
- Set aside a portion of HOME funds for new nonprofit affordable housing developers.

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

- Continue to work to develop and maintain a list of housing providers that serve low-income/homeless and their requirements and include them in forums and stakeholder meetings.
- Continue to encourage communication among providers- using Information & Referral and/or the Coordinated Entry System.
- Continue to work to develop a Housing Crisis Resolution System.

Program Specific Requirements

AP-90 Program Specific Requirements – 91.220(I)(1,2,4)

Introduction:

In accordance with federal regulations, this Action Plan describes the CDBG, HOME, and ESG activities proposed to be undertaken with 2019 allocations. To the extent allowed by federal regulations, MDHA may claim costs incurred prior to the effective date of respective grant agreement.

CDBG funds will be used to assist low and moderate income households and low and moderate income areas.

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

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

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

Other CDBG Requirements

- | | |
|---|---|
| 1. The amount of urgent need activities | 0 |
|---|---|

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

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

N/A

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

HOME Resale/Recapture Guidelines are provided in Appendix A.

On April 15, 2019, HUD issued 2019 homeownership value limits for the HOME program. Upon review of limits, MDHA became concerned that the HUD-provided limits were lower than the values in the current Nashville market. Review of local housing data substantiated these suspicions. As a result, MDHA is submitting documentation in Appendix B of this Action Plan seeking HUD approval for MDHA to use local value limits established in accordance with the requirements and methodology outlined at 24 CFR 92.254(a)(2)(iii). Based on the data provided using the prescribed methodology, 95% of the median purchase price limit will be \$249,138 for single family existing construction and \$355,010 for single family new construction. These are the value limits MDHA will utilize to ensure homes acquired with HOME funds comply with modest housing requirement of 24 CFR 92.254. All Homes must be sold to households with incomes at or below 80% AMI.

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

The HOME Resale/Recapture Guidelines in Appendix A include a description of affordability requirements.

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

N/A

Emergency Solutions Grant (ESG)
Reference 91.220(l)(4)

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

Nashville's ad hoc CoC Written Standards Committee (member agencies listed below) began meeting in late January 2019 to revise a January 2018 draft document to guide the provision of housing and services funded via both HUD CoC and ESG funding. Once complete, a final draft will be emailed to a CoC listserv of over 480 stakeholders, including agencies awarded CoC and ESG funding, for review and input.

CoC Written Standards Ad Hoc Committee Members include staff from the following agencies, most of which receive either CoC and/or ESG funding.

- The Mary Parrish Center
- Room in the Inn
- The Salvation Army
- Vanderbilt University Medical Center
- Operation Stand Down TN
- Mental Health Cooperative
- Oasis Center
- Cathi Buckner, Lived Experience
- Nashville Rescue Mission
- Nashville CARES
- The Next Door

- Safe Haven Family Shelter
- The United Way of Metro Nashville

The draft will also be publicly posted on the internet for comment at <http://www.nashville-mdha.org/community-development/about-the-continuum-of-care>.

Once these stakeholders have had sufficient time to offer feedback, a final version will be completed and submitted to the CoC Planning Council and membership for formal approval.

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

The Nashville-Davidson County Coordinated Entry System (CES) has a decentralized access approach with designated entry points for different populations (individuals, families, youth, and Veterans). The Metropolitan Homeless Impact Division (HID) has designated a staff member to help the community coordinate and build CES. This individual serves as the planning lead, by staffing specific committees, and being the main contact point for approximately 25 agencies that participate actively in CES.

The CES was created to identify and engage any person or family who is experiencing a housing crisis in order to enhance our diversion and prevention efforts in the larger Housing Crisis Resolution System. To accomplish this objective, anyone who is experiencing a housing crisis, and has given consent, is entered into CES via HMIS and completes a preliminary assessment. (A person may still receive services even if they do not consent to HMIS.)

Nashville-Davidson County is utilizing the VI-SPDAT tool as the community's housing triage assessment tool. Once a person has identified housing as a goal and is literally homeless, a VI-SPDAT is completed with that person. If the person falls into the Youth and Youth Adult (YYA) population, a TAY-VI-SPDAT is completed; and the community uses the Family-VI-SPDAT for families with minor children.

The CoC is in the process of strengthening its prioritization methods in Nashville/Davidson County. Generally, priority will be given to households who have high scores on the VI-SPDAT; with the length of people's homelessness and any extenuating circumstances brought forward during care coordination meetings also factored in.

Our community holds three (3) different care coordination meetings where provider agencies discuss the households with the highest barriers to housing and consult on how to assist those households to move to permanent housing and link them with the right supports as quickly as possible. Each care coordination group meets every two (2) weeks and focus on Veterans, families with minor children, and individuals (youth are currently included in the individual or family discussion depending on whether they have minor children in the household).

The CoC has received grant funding for (3) three CES coordinators that conduct outreach and in-reach across Davidson County to identify people experiencing homelessness and link them to the best organization/agency that can provide services and housing as quickly as possible based on the client's needs.

The CoC ad hoc CES/CoC Written Standards Committee will be working on improvements to CES that includes but is not limited to a plan to provide after-hour services.

Nashville is in the position to offer immediate access to shelters for most individuals and families. Further investment in data collection through HMIS will help quantify the gaps where focus is needed, including but not limited to, serving single male-headed households, and couples who refuse to separate.

In addition, the CoC is working on establishing a Consumer Advisory Board, to provide ongoing feedback on our overall Housing Crisis Resolution System.

The HID trains and coordinates with housing navigators, who are the frontline staff, at 20+ partner agencies that coordinate services and housing for people accessing CES.

FY2018 CoC funding awards promise to strengthen the city's CES and HMIS capabilities. Nashville garnered three (3) new Domestic Violence bonus projects; one which will develop a CES specifically designed to serve this subpopulation, which will eventually be integrated into the CES for all populations. An HMIS

Expansion grant was also awarded that will double staffing capacity to assure more robust and accurate data collection efforts in Nashville.

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

A Request for Applications is emailed to over 40 community- and faith-based entities and/or governmental agencies, advertised in several local papers and published on the MDHA website. Application responses are reviewed and rated by a five to six-member review committee based on the following evaluation criteria: Project Quality; Need for Project; Operational Feasibility; Applicant Capacity, including HMIS data quality; and proven ability to stabilize homeless people with housing and income supports. Awards are made based on the highest ranked scores of the applications and recommendations of the review committee. The review committee typically includes staff from various funding agencies, program coordinators and a formerly homeless person. In 2018, members of the CoC Performance Evaluation Committee (PEC) also served on the ESG evaluation committee. Discussions are underway to potentially merge the PEC and ESG review committees to allow them to review both programs to facilitate increased coordination between the funding sources.

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

Each year, MDHA recruits someone who has been, or who is currently, homeless to serve on the ESG Review Committee. A clause requiring homeless input is also included in all Agreements between MDHA and ESG subrecipient agencies.

5. Describe performance standards for evaluating ESG.

The CoC ad hoc Written Standards Committee began meeting in January 2019 to revise a January 2018 draft document to guide the provision of housing and services funded via HUD CoC and ESG. Once complete a final draft will be emailed to a CoC listserv of over 480 stakeholders, including agencies awarded CoC and ESG funding to get their input. Once stakeholder input is obtained, the document will be presented to the CoC membership and Planning Council to obtain their approval.

This is a work in progress, as the Continuum increases its focus on data collected via HMIS (& comparable databases, in the case of domestic violence shelters). The document as currently drafted contains the following performance benchmarks for ESG projects:

Emergency Shelter		Target
	Exits to Permanent Housing	25% - Individuals – 45% - Families
	Length of Stay	≤30 days or no more than 90 days
	Recidivism	10%

Agencies using ESG funds will continue to strive to assure that housing stability & incomes are increasing via ESG funds, as well as how stays in shelter are becoming shorter, and recidivism is declining.

METROPOLITAN NASHVILLE-DAVIDSON COUNTY, TENNESSEE

APPENDICES

**SUBSTANTIAL AMENDMENT 1
TO THE
2018 – 2023 CONSOLIDATED PLAN
FOR
HOUSING AND COMMUNITY
DEVELOPMENT
AND
THE 2019-2020 ANNUAL UPDATE
FOR**

PROGRAM YEAR TWO

For the period June 1, 2019 – May 31, 2020

Prepared by:

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



On Behalf of:

The Metropolitan Government of
Nashville and Davidson County

Updated May 28, 2019



Substantial Amendment 1 to the 2018-2023 Consolidated Plan

For

Housing and Community Development

And

The 2019-2020 Annual Update

(2019 Action Plan) Program Year Two

APPENDICES

Appendix A – HOME Resale/Recapture Provisions

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

Appendix C – Summary of Consultation Survey Comments and Responses

Appendix D – HOPWA Consultation Summary

Appendix E – Public Notices

Appendix F – Summary of Public Comments and MDHA Responses

Appendix G – Fair Housing Plan

APPENDIX A

HOME RESALE/RECAPTURE PROVISIONS

I. BACKGROUND

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

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

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

II. DEFINITIONS

- Development Subsidy – a development subsidy is defined as financial assistance provided by MDHA as the HOME program administrator to offset the difference between the total cost of producing a housing unit and the fair market value of the unit. When provided independently and absent any additional subsidy that could be classified a direct subsidy, development subsidy triggers resale.
- Direct Subsidy – a direct subsidy is defined as the amount of HOME assistance, including any program income that enables the homebuyer to buy the unit. The direct subsidy includes down payment, closing costs, interest subsidies, or other HOME assistance provided directly to the homebuyer. Direct subsidy also includes any assistance that reduces the purchase price from fair market value to an affordable price. If HOME funds are used for the cost of developing a property and the unit is sold below fair market value, the difference between the fair market value and the purchase price is considered to be directly attributable to the HOME subsidy. A direct subsidy triggers recapture.
- Net Proceeds – the sales price minus superior loan repayment (other than HOME funds) and any closing costs.

III. PERIOD OF AFFORDABILITY

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

a. Period of Affordability Under Resale Provisions

Under resale, §92.254(a)(5)(i) of the HOME rule states that the period of affordability is based on the total amount of HOME funds invested in the housing, regardless of whether or not the funds are reflected in buyer financing. In other words, the total HOME funds expended for the unit determines the applicable affordability period. Any HOME program income used to assist the project is included when determining the period of affordability under a resale provision.

b. Period of Affordability Under Recapture Provisions

Under the recapture option, the period of affordability is based upon the HOME-funded Direct Subsidy provided to the homebuyer that enabled the homebuyer to

purchase the unit. Any HOME program income used to provide direct assistance to the homebuyer is included when determining the period of affordability.

The following table outlines the required minimum affordability periods. Affordability periods for HOME-assisted units that also receive assistance through the Metro Housing Trust Fund (Barnes Fund) and/or the Community Land Trust (CLT) will be aligned with the affordability periods of those programs.

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

IV. RESALE PROVISIONS

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

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

The resale provisions allow the original HOME-assisted homebuyer to sell the unit to an income eligible homebuyer. The resale provision does not require repayment of the HOME funds used to assist the original homebuyer, but rather preserves the affordability of the unit through the sale of the property to a subsequent lower income homebuyer. All HOME resale restrictions must apply to the original and any subsequent homebuyer throughout the period of affordability.

a. Applicability

MDHA has chosen to use Resale Provisions for all HOME-assisted homebuyer units in order to preserve the affordable housing stock. Thus any HOME assistance, development or direct subsidy to the homebuyer, will trigger the use of Resale provisions. This decision is predicated by the loss of 20% (18,000 units) of the

affordable housing stock since the year 2000 based on the “House Nashville” housing report issued by the Mayor’s office in May 2017 and the fact that home prices in Metro Nashville-Davidson County is continuing to escalate.

Additionally, Resale Provisions will apply to any HOME-assisted homebuyer project that also receives assistance through the Metro Housing Trust Fund Commission (Barnes Fund) with the minimum affordability period of 20 years. The PJ is in the early stages of establishing a Community Land Trust (CLT) which will preserve the affordability of properties for perpetuity while enabling homeowners to build wealth through the use of a resale formula that will restrict the sales price for subsequent buyers (formula TBD). An advisory committee will ensure policies and procedures are established for the CLT including resale requirements. Any HOME funded CLT units will be subject to the resale provisions/formula and minimum affordability requirements established by the CLT.

b. Effect

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

c. Fair Return on Investment

Resale Provisions shall ensure that, if the property is sold during the period of affordability, the price at resale provides the original HOME-assisted homebuyer a fair return on investment (including the original homebuyer's initial investment and any capital improvement). The value of capital improvements is defined as the actual, documented costs of permanent structural improvements to the property that enhance the property value. Capital improvements are generally non-recurring expenses, such as the cost of an addition, or a remodel. Repairs and regular maintenance are not capital improvements. To be considered by MDHA in determining fair return on investment, the actual costs of the capital improvements must be documented with receipts, cancelled checks, or other documents acceptable to MDHA. Additionally, the work must have been properly permitted and inspected and MDHA will visually inspect the property to verify that the capital improvements exist.

MDHA shall consider a fair return on investment achieved when the original homebuyer (now the seller) receives from the sale a percentage return on investment based on the percentage of change as calculated by the **Housing Price Index** Calculator of the Federal Housing Finance Agency. The HPI Calculator is currently located at <https://www.fhfa.gov/DataTools/Tools/Pages/HPI-Calculator.aspx> and forecasts what a given house purchased at a point in time would be worth today if it appreciated at the average appreciation rate of all homes in the area. The calculation shall be performed for the Nashville-Davidson—Murfreesboro—Franklin, TN Metropolitan Statistical Area.

Calculating Fair Return on Investment - EXAMPLE

1. Down payment: The original homeowner put down \$1,000 earnest money at the signing of the sales contract.
2. Cost of Capital Improvements: The original homeowner had a permitted, inspected, fence installed at a cost of \$1,500 and has receipts to document the cost and a visual inspection confirms the fence is there.
3. Percentage of Change: The original purchase price for the home was \$125,000 and the amount of HOME subsidy invested in the unit was \$25,000, additionally the home received Barnes Funds requiring a 20-year affordability period.

For the purposes of using the Federal Housing Finance Agency's Housing Price Index (HPI) calculator, the home was purchased in the 3rd Quarter of 2014, and will be calculated using the most current quarter available, 4th Quarter of 2017. Using the HPI calculator, the house would be worth approximately \$169,841.

Calculating the Fair Return to the Original Owner:

Downpayment:	\$1,000
Capital Improvements	\$1,500
Increase in value per HPI:	<u>\$44,841</u>
	\$47,341 Fair Return on Investment

In order to realize a fair return to the original homeowner, the sales price must be set at roughly \$172,341 (i.e., \$125,000 + \$1,000 down payment + \$1,500 capital improvements + \$44,841 HPI increase = \$172,341).

The seller must have the sales price approved by MDHA. Additionally, MDHA must verify that the new homebuyer is income eligible. If the resale price necessary to

provide a fair return to the seller is not affordable to the subsequent lower income homebuyer, MDHA may provide additional HOME assistance, if available as an eligible activity in the Action Plan. If additional HOME assistance is provided, the affordability period will start over.

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

d. Continued Affordability

In addition to ensuring that the HOME-assisted homebuyer receives a fair return on his or her investment, MDHA's Resale Provisions shall ensure that the housing under a Resale Provision will remain affordable to a reasonable range of low-income homebuyers. Accordingly, MDHA shall ensure that the sales price of a home resold under Resale Provisions is within the maximum mortgage capacity of a target population of potential buyers with incomes ranging from 65% to 80% of the Area Median Income (AMI) adjusted according to family size. Sales prices shall be set such that the amount of Principal, Interest, Taxes, and Insurance does not exceed 30% of the new homebuyer's annual income.

e. Imposing Resale Provisions

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

While mortgage and lien documents are used to secure repayment of the HOME subsidy, these documents are not sufficient to enforce the Resale Provisions. Separately recorded deed restrictions, covenants running with the land, or other similar mechanisms must be used to impose the Resale Provisions (§92.254(a)(5)(i)(A)) in HOME-assisted homebuyer projects under the resale option.

The purpose of these enforcement mechanisms is to secure and retain the affordable re-use of the property, while providing a fair return to the seller.

f. Foreclosure

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

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

V. RECAPTURE PROVISIONS

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

a. Applicability

Recapture Provisions are not deemed appropriate for securing HOME Program investments in the current escalating housing market of Metro Nashville-Davidson County, thus, Resale Provisions are generally applicable to all MDHA homebuyer activities, unless circumstances otherwise require Recapture to be used. Specifically, Recapture Provisions are always used in cases involving a Direct Subsidy to a homebuyer. Recapture provisions cannot be used when a project receives only a Development Subsidy and is sold at fair market value, because there is no direct HOME subsidy to recapture from the homebuyer. Instead, Resale Provisions must be used in this case.

b. Effect

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

c. Imposing Recapture Provisions

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

The written agreement between the homebuyer and MDHA, as well as mortgage and lien documents are all used to impose the Recapture Provisions in HOME- assisted homebuyer projects under the recapture option. The purpose of these enforcement mechanisms is to ensure that MDHA recaptures the Direct Subsidy to the HOME-assisted homebuyer if the HOME-assisted property is transferred. Unlike the resale option, deed restrictions, covenants running with the land, or other similar mechanisms are not required by the HOME rule to be used in homebuyer projects under the recapture option.

d. Foreclosure

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

restrictions does not satisfy the requirement that the property remains qualified as affordable housing under §92.254 for the period of affordability.

Consequently, homebuyer housing with a Recapture Provision is not subject to the affordability requirements after MDHA has recaptured the HOME funds in accordance with its written agreement. If the ownership of the housing is conveyed pursuant to a foreclosure or other involuntary sale, MDHA shall attempt to recoup any net proceeds that may be available through the foreclosure sale. MDHA is subject to the limitation that when there are no net proceeds or net proceeds are insufficient to repay the HOME investment due, MDHA may only recapture the actual net proceeds, if any.

VI. REFINANCING POLICY

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

1. The refinancing must be necessary to reduce the owner's overall housing costs, OR
2. The refinancing must otherwise make the housing more affordable, AND

MDHA will not subordinate to refinancing for the purpose of taking out equity.

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

MONITORING RESALE & RECAPTURE PROVISIONS

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

forward” instructions may demonstrate whether the buyer is receiving mail at the home.

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

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

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

VII. APPROVAL OF CHDO & SUBRECIPIENT PROVISIONS

CHDOs and Subrecipients carrying out development and/or homebuyer activities on behalf of MDHA shall be contractually bound to apply and implement these same Resale and Recapture Provisions, verbatim. As such, review and approval of these Provisions

APPENDIX B

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

Compilation of Single Family New Construction Real Estate Sales (defined as closed sales on units constructed in 2018 and 2019) for a 3-month period December 2018 – February 2019

Month	Unit Type	Sales Volume	Median Price Based on 95%
December 2018	Single Family - New Construction	179	\$354,526.00
January 2019	Single Family- New Construction	156	\$340,005.00
February 2019	Single Family – New Construction	143	\$370,500.00
	Average Volume & Median Sales Price for Months reviewed	478	\$355,010.00

Sales Volume for Single Family New Construction Units is less than 250 sales per month so 3 months' worth of sales data is required per HUD guidelines to establish a median sales price based on local data of **\$355,010**.

HUD New Home Construction Single Family Limit effective April 15, 2019 - \$261,000 – median prices listed above for each of 3 months reviewed exceed this limit.

Compilation of Single Family Existing Real Estate Sales for 1-Month Period February 2019

Month	Unit Type	Sales Volume	Median Price Based on 95%
February 2019	Single Family – Existing	576	\$249,138.00

Sales Volume for February 2019 exceeds the required 500 volume of sales per month, therefore February 2019 sales data was utilized to establish a median sales price per HUD guidelines

based on local data of **\$249,138**.

HUD Existing Home Single Family Limit effective April 15, 2019 - \$243,000 – median prices listed for February 2019 exceeds this limit.

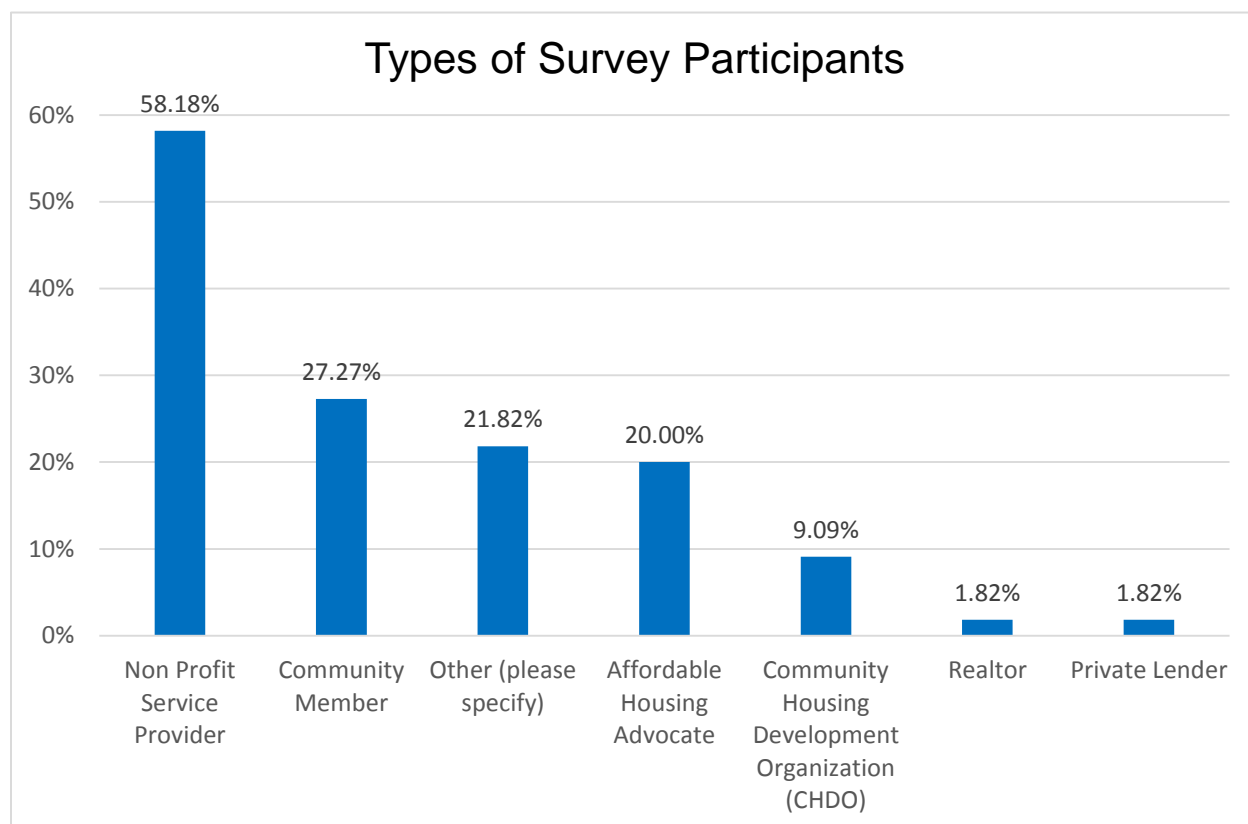
Average Median Sales price for New Construction and Existing Construction is \$302,074

**Source data provided via - Realtracs, the local Multiple Listing Service for Nashville-Davidson County - Due to the volume of data, please contact the Community Development Department by phone at 615-252-8505 or by email at consolidatedplan@nashville-mdha.org to request to view the source data.*

APPENDIX C

SUMMARY OF CONSULTATION SURVEY COMMENTS AND RESPONSES

2019 Action Plan Consultation Survey November 15, 2018 – December 21, 2018 Metropolitan Development Housing Agency



Other Survey Participants: Government | Local Government Agency | Home Rehabilitation | University | Domestic Violence Advocacy | Financial Institution | Governmental Agency - Homeless and Housing | State Housing Agency | Youth and Self Sustainability Advocate | For Profit Developer | Neighborhood, Business, Developer Alliance | Workforce Investment Board

Organizations Responding

1. 18th Avenue
2. A Financial Institution
3. AAOC Camps for Youth Development
4. ABL Realty Services
5. Alliance for Green Hills (Nashville)
6. ALL-IN ALL STARZ, INC.
7. Be a Helping Hand Foundation
8. Bordeaux Neighborhood Association
9. Bridges for the Deaf and Hard of Hearing
10. Buffalo Valley Inc.
11. C.E. McGruder Family Resource Center
12. Catholic Charities
13. Centerstone
14. (2) Conexion Americas
15. Davidson County Relative Caregiver Program
16. Empower Tennessee
17. Family and Children's Services
18. Frist Tennessee
19. Goodwill Industries of Middle TN, Inc.
20. Habitat for Humanity of Greater Nashville
21. Health Department
22. 1. Individual community member/advocate 2. Workforce Essentials
23. Metro Council
24. Metro Government
25. MiKen Development LLC
26. Monroe Harding, Inc.
27. (2) N/A
28. Nashville Career Advancement Center
29. Nashville CARES
30. New Level Community Development Corp
31. NOAH Nashville Organized for Action and Hope
32. Office of Family Safety - Jean Crowe Advocacy Center
33. Open Table Nashville
34. Operation Stand Down Tennessee
35. Project Return
36. (3) Rebuilding Together Nashville
37. (3) Self
38. St. Luke's Community House
39. Successful Survivors - HOPEWORKS
40. (3) The Salvation Army
41. Tennessee Fair Housing Council
42. THDA
43. The Housing Fund
44. The Next Door
45. TruCare Transformation
46. Veteran Affairs
47. Welcome Home Ministries

Survey Questions & Responses:

Question: Distribution of CDBG Funds (%)

Responses:

- 43% Housing Preservation (Rehab) Activities for **Rental** Properties
- 35% Housing Preservation (Rehab) Activities for **Owner** Properties
- 22% Non-Housing Community Development Activities

Question: Prioritization of Barriers to Affordable Housing

Responses:

1 (Highest Priority) - 10 (Lowest Priority)

1. Availability and Cost of Land
2. Scarcity of Funding
3. Credit Challenges
4. Lack of Mandatory Inclusionary Zoning
5. Criminal History
6. Negative Perception (NIMBYism)
7. Housing Discrimination
8. Property Taxes
9. Zoning/Density Requirements
10. Prohibition on Local Hire Requirements

Question: Prioritization of Non-Housing Community Development Needs

Responses:

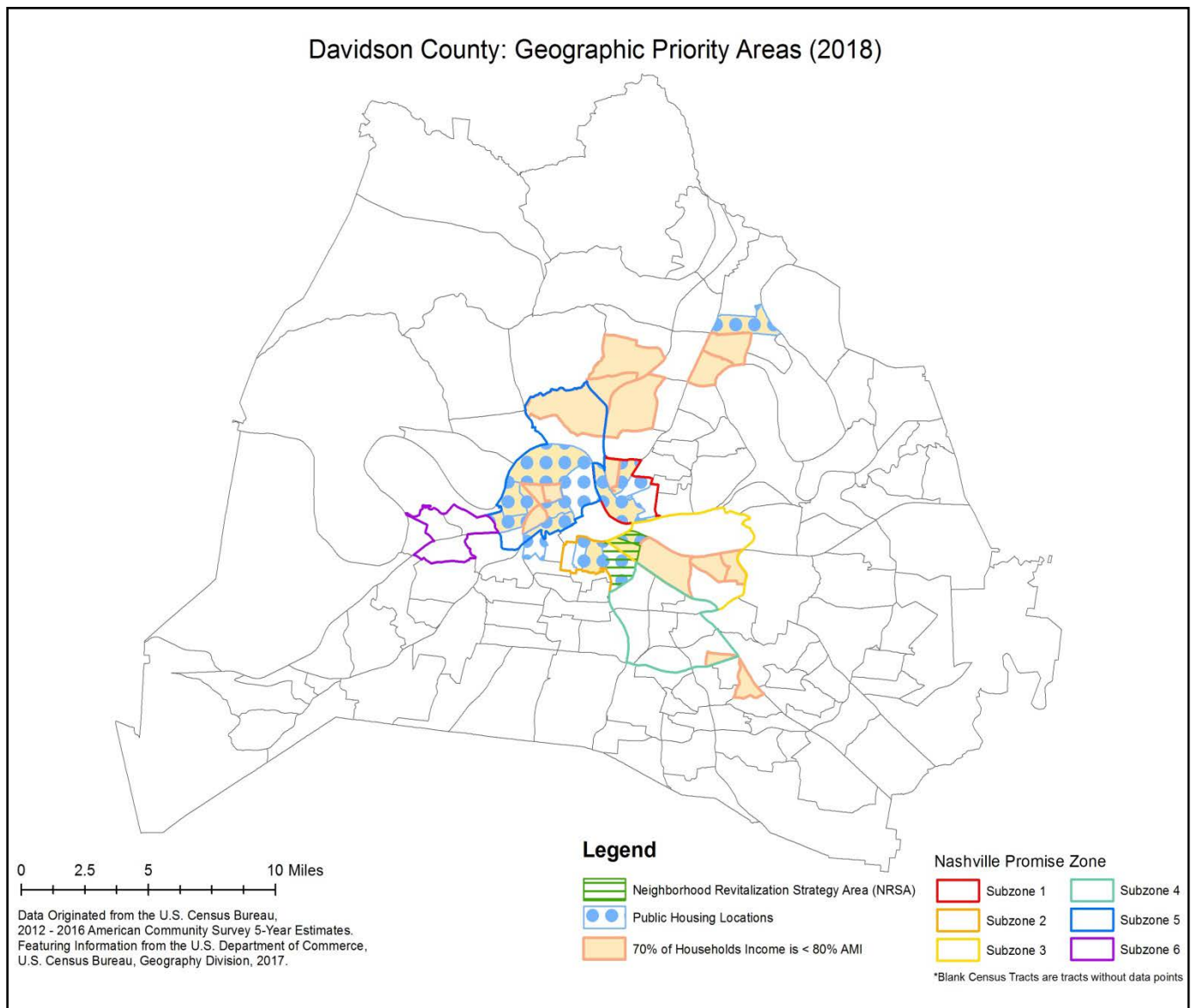
1 (Highest Priority)

1. Community centers/neighborhood centers – “one-stop-shops” – that offer a variety of programs and services ranging from recreational opportunities to job training/workforce development classes where child care was available to central intake for public services. These facilities should be located in low-income areas and easily accessible via public transportation.
2. Mental Health Services
3. Job Training

4. Sidewalks to make neighborhoods more walkable and connect to bus stops. In low-income areas in North Nashville, Bordeaux, Antioch, and Madison.
5. Youth Programs
6. Financial Literacy Services

CDBG Geographic Priority Areas Map

Question: Input on the CDBG Geographic Priority Areas Map



Responses:

Agree

1. Accurate
2. Agree with these priorities
3. AGREED
4. Focusing on the neighborhoods with most people below 80% AMI makes sense.
5. Looks like a great approach.
6. No issues
7. Ok
8. Okay

Change in Priority Areas

9. Due to gentrification target populations and Priority Areas may need to be reassessed.
10. Should focus on transit corridors within large census tracts
11. The mapped areas should be defined by streets which would require a closer and more detailed map

Change in Method for Designating Priority

12. Some of these areas are gentrifying quickly, even if inclusionary zoning per se is not in place, there are other ways to provide incentives to affordable housing - use TIF money to support affordable housing, not just corporate deals.

More Public Housing Stock and Locations

13. I think we should diversify the locations of public housing. This would also then motivate expansion of the public transportation network.
14. Lacking public housing options in some of the areas where 70% of household income is below 80% AMI
15. There should be more public housing available in the periphery areas, close to schools and to a bus line.

Access to Transportation

16. Public Housing is concentrated. We need more integrated housing and mixed income areas of town.
17. These are areas where affordable housing primarily exists, although these are also areas of concentrated poverty and where many residents feel ignored and overlooked

More Services at Public Housing Locations

18. Public housing locations need to have opportunities offered in their neighborhoods as offered and include input from the families as to the needs in their neighborhoods. It would be great if the housing managers could create a Community Resource event. I am aware that some have quarterly meetings, but something that could be active all the time.
19. There seems to be a concentration and overlap of public housing locations and households experiencing financial distress. This suggests that more intensive and comprehensive services for employment, small business development and other legal ways of generating income must be prioritized.

NRSA Comments

20. Haven't heard much information about the NRSA
21. Need to see a lot more activity in the NRSA
22. What specifically are the boundaries of the NRSA?

MDHA Response: Census Tracts 148, 160, 161 (indicated with green outline and horizontal lines on the map)

Other Comments:

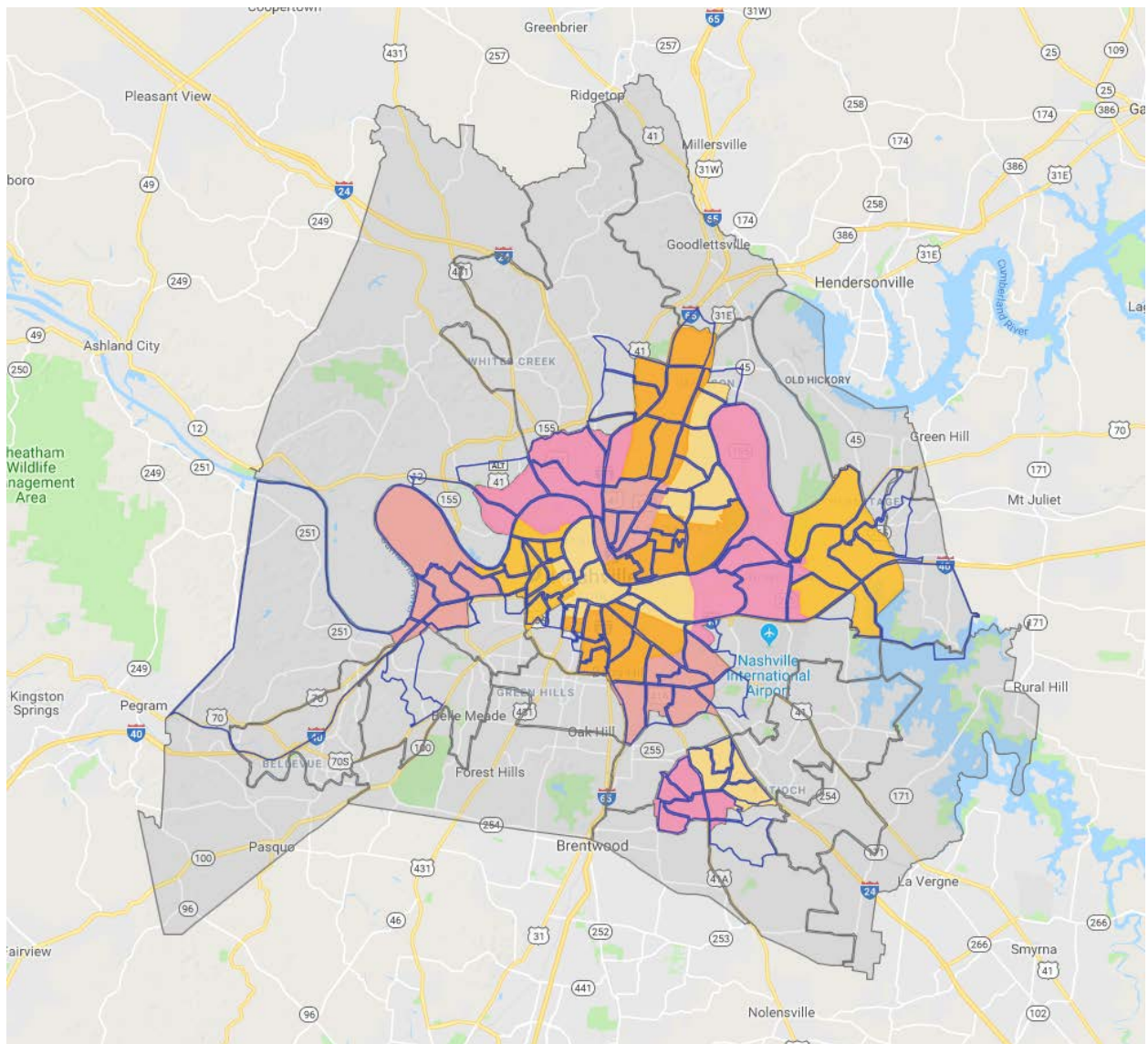
23. Funding should be available for households with <80% AMI to live affordably without deciding whether to buy food or pay rent.
24. Map is inaccessible to screen reader users
25. MDHA appears to be shifting public housing further out into North Nashville and Bordeaux, and gentrifying Nashville historical housing projects, which is against federal requirements of CDBG funds.
26. N/A

Question: Distribution of HOME Funds (%)

Response:

60% New Construction Activities - For **Rental** Properties
40% New Construction Activities - For **Owner** Properties

Housing Target Area Map



Question: Input on The Housing Target Area Map

Responses:

Agree

1. Accurate
2. Looks appropriate
3. Looks right
4. Looks well thought out.
5. Agree with these target areas
6. These targeted areas are consistent with the actual need for the city of Nashville
7. Ok

No Comment

1. No comments
2. No input

Issues with Map

1. There was no key to the meaning of the colored areas and how they correspond to the areas with significantly increased property values during the 2017 reappraisal.

MDHA Response: The 14 Council Districts in the Housing Target Area experienced at least a 40% increase in property values during the 2017 reappraisal.

2. No legend for the colored area. What do the colors represent?
3. Unclear on the color coding versus the data explanation above. Cannot adequately speak on this.

MDHA Response: Yellow, Pink and Orange Shapes: Colors used to distinguish the 14 council districts within the Housing Target Area.

MDHA Response: Blue Outline: Color used to distinguish the different census tracts within the Housing Target Area.

MDHA Response: Gray: Color used to distinguish Davidson County council district boundaries outside of the Housing Target Area.

Additional Comments on Housing Target Areas

4. Add District 1
5. Affordable housing that is accessible to people with disabilities must be prioritized in all target areas.
6. Growth and price increases continue to make affordability a challenge.
7. Hopefully the housing will remain affordable as the area is developed
8. I think that at this point build housing wherever it is most efficient and create resources for residents to access transportation, employment, food, and healthcare nearby
9. I would be interested in following the trail starting with an anonymous call to codes about property standards violations, to what happened to the house. Was it repaired? Bought? If bought, by whom? Are developers anonymously reporting elderly, poor, or disabled for property standards violations in the hope of snatching up the property at bargain prices?
10. I'd focus on poverty areas, and try to locate housing near transportation corridors.
11. How does this match with transportation access and future transportation plan?

MDHA Response: Consolidated Plan, regulations require consultation with specific stakeholders, including but not limited, to Metropolitan-wide planning and transportation agencies. Metro Transit Authority's nMotion, Nashville MTA/RTA

Strategic Plan (September 2016) sets forth recommendations to address regional transportation issues as the region continues to grow. Recommendations were considered when developing strategies to address affordable housing along transit corridors in the 2018 – 2023 Metro Nashville Consolidated Plan.

12. Low income and homeless citizens are being pushed further out each year.
13. People are being forced out of their neighborhoods by gentrification. Rather than improving Nashville for everyone, we are investing in enticing people from other states to move here. We are driving out Nashvillians and importing new residents. It's maddening and wrong. There is no real focus on affordable housing or controlling rental market rates. Nashville seems to have overspent on becoming the "it city" with the belief that new tax revenues would come from the development that would follow. That's clearly a broken model. We must prioritize making Nashville affordable and livable for all people, prioritizing the folks who are already here.
14. Rentals that are affordable; property and buildings are maintained as needed; Allow folks to increase income for several months for subsidized housing and provide financial guidance in a tier level increase in rent. Home ownership with a beginning property tax assessment that is lower and can incrementally be increased over several years to allow new homeowner to be vested and work up to actual property values in the area; do not have them compete with the new high dollar structures immediately -Again- provide a tier structure that they know about prior to renting or buying
15. Some of your metrics are off - if you look at lower percentage increase in property values, did you control for the ones that were already high? I think it depends on what you hope to do – building affordable housing where none exists makes sense but also try to ensure that areas at risk for displacement are provided services to allow long term residents to upkeep their homes to either benefit from the flourishing neighborhood or get a fair price should they decide to sell.
16. There may be some areas that are "too far gone" with gentrification to really benefit from public investment at this point (Cleveland Park, East Nashville, South Inglewood, Woodbine, some sections of North Nashville)
17. We definitely see this trend represented in District 17

18. We need to focus more on the housing we currently have as opposed to building more

19. Whites Creek

Question: Prioritization of Needs Housing; Among the Following Populations

Response:

1 (Highest Priority)

1. Very low-income households ($\leq 50\%$ AMI aka $\leq \$37,450$ [2018])
2. Large Families
3. Persons with Disabilities
4. Elderly (age 62+)

Question: Prioritization of Needs Non-Housing Community Development; Among the Following Populations

Response:

1 (Highest Priority)

1. Very low-income households ($\leq 50\%$ AMI aka $\leq \$37,450$ [2018])
2. Persons with Disabilities
3. Large Families
4. Elderly (age 62+)

Question: Suggestions for Addressing Fair Housing Issues and/or Concerns.

Responses:

1. Allow local reporting and initial investigation of complaints under city and state laws, as HUD takes forever to investigate. Require any landlord/property management receiving any tax incentives/funding to undergo through fair housing training including on issues of racial discrimination causing criminal history, mental health disabilities, and how treating everyone exactly the same is NOT what fair housing means.
2. Continued education and outreach; additional funding;
3. Create opportunities for people with criminal backgrounds.

4. Development of consensus on the issue across Nashville....not just in targeted areas. We all must be involved in addressing the housing issue
5. Educate folks on equity and inclusion
6. Education of landlords and education of how fair housing violations can be reported without fear of repercussions.
7. Folks who are approved for vouchers are not always realistic, they can't find housing within the guidelines
8. Gentrification and displacement are major issues and has a lot to do with fair housing.
9. Gentrification of urban Nashville
10. Hiring bilingual/bicultural staff
11. I really don't have any suggestions. I think we need to assist all of the groups listed in a manner that works for them and with the funding we have to serve them.
12. It is important to insure that all citizens have an equal right to adequate and affordable housing and that citizens are not discriminated against in their quest for safe, decent, and affordable housing,
13. More seminars
14. More Subsidy vouchers offered, and more landlords required/enforced to take them. If we can't control the housing market rate, we need to provide options for low-income households to actually compete/obtain housing.
15. N/A
16. N/a
17. No Suggestions
18. None
19. Prohibit source-of-income discrimination
20. Provide various methods to search & apply for affordable housing, not just online and requiring email accounts for notifications. Provide a central location where people may be referred to for all housing questions as well as trained staff to guide individuals through the whole process.
21. The city needs an accountability tool to hold landlords accountable to their tenants. There are countless landlords that take advantage of the elderly, women with children, and migrant families. The city can generate revenue by fining culprits who infringe on tenants' rights
22. There is a lack of fair and affordable housing for low-income and large families. There is also a shortage of housing availability for formerly justice involved citizens who have successfully paid their debt to society.
23. There must be more regulation to address fair housing. Owners/Landlords must be held accountable.

24. Use faith-based possibilities more strategically. Each Sunday, there is a captive audience with high probability of receiving, responding, and making great use of services.
25. Utilize social media/webinars to provide information on Fair Housing to at risk populations. Partner with faith based groups to help reach at risk populations
26. Widely distribute some educational piece about fair housing rights.
27. Work on prevention of displacement. Or, as suggested above, in areas where there is displacement occurring, work to rehab homes with homeowners prior to them putting it on the market so that they can benefit from the increased sales prices. Allow for real estate agents to do community work to prevent longtime residents from responding to the daily postcards of developers willing to pay cash for property "as is". Or have some type of community based governor that would raise an alert if a house is being sold way below value.

Question: Prioritization of Populations to be Served by Homeless Assistance Programs

Response:

1. Families
2. Youth Aging out of Foster Care/State Custody
3. Chronic
4. Persons Discharged from Health Care/Mental Health Facilities
5. Veterans
6. Persons Discharged from Corrections Programs & Institutions

Question: Prioritization of Activities to Address Homelessness

Response:

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

Question: Prioritization of Services to Address Homelessness

Response:

1. Permanent Housing Facilities
2. Transitional Short-Term Housing Facilities

3. Short-Term Rent, Mortgage & Utility Assistance Payments (STRMU)
4. Tenant-Based Rental Assistance (TBRA)

Question: Top Three Barriers to Affordable Housing for Persons/Families that are Homeless or are At-Risk of Homelessness

Responses:

1st Barrier(s):

Affordable and Available Housing Stock

1. Affordability
2. Affordability
3. Affordability
4. Affordable housing stock/availability
5. Availability
6. Availability
7. Availability
8. Availability in desirable locations
9. Availability of affordable & low-income housing
10. Available affordable housing
11. Available and affordable properties
12. Cost
13. Cost and availability
14. Cost of housing in Davidson County
15. Decreasing inventory of affordable housing
16. Down payment
17. Housing affordability
18. Lack of affordable housing stock
19. Lack of affordable housing/disproportionate investment by government toward "development" over housing

20. Lack of available affordable housing
21. Lack of housing in the city
22. Lack of supply
23. Limited supply and long wait lists
24. Number of affordable units

Lack of Income or Inadequate Income; Lack of Job Opportunities

25. Employment and steady income
26. Job/income/wages
27. Lack of income or inadequate income
28. Lack of income to pay rent
29. Lack of jobs
30. Lack of resources
31. Sufficient income
32. Wages
33. Wages too low - livable wages not minimum wages

Credit Checks & Background Checks

1. Arrears/evictions/poor rental history
2. Criminal background
3. Discrimination (criminal background/financial/behavioral)
4. Poor credit
5. Rental history

Financial Assistance

6. Financial
7. Financial assistance
8. Financial resources and money management skills

Transportation

9. Lack of access to transportation
10. Transportation barriers

Other Barriers

11. Awareness
12. Lack of available prevention/diversion funds
13. Participating landlords
14. Unable to consistent contact information

2nd Barrier(s):

Affordable and Available Housing Stock

1. Affordability
2. Affordability
3. Affordable and centralized affordable housing
4. Affordable housing...subsidized
5. Cost
6. Cost and availability
7. Housing
8. Lack of affordable housing options and/or funding
9. Lack of affordable rental units
10. Lack of inexpensive housing
11. Limited subsidized options
12. Price points of housing
13. High rent costs in current market

Credit Checks & Background Checks

14. Child care
15. Chronic homelessness
16. Credit
17. Credit
18. Credit and income
19. Credit Checks
20. Credit issues and background checks
21. Credit score/financial stability

22. Lack of rentals for those with criminal/credit issues

Lack of Income or Inadequate Income;

Lack of Job Opportunities

23. Income revenue source
24. Job security
25. Lack of access to living wages
26. Lack of employment
27. Lack of income
28. Lack of up-front money needed to move in (deposit, first month's rent)
29. Living wage
30. The fact that wages are stagnant and have not kept pace with the rising costs of housing

Mental Health Care

31. Mental health
32. Mental health
33. Mental health issues

Lack of Support Services

34. Lack of ongoing, intense support services
35. Lack of services (whether mental health, youth services, etc.)
36. Lack of supportive services

Discrimination

- 37. Restrictions/discrimination
- 38. Source of income discrimination/requiring certain income

Other Barriers

- 39. Emergency assistance
- 40. Funding

- 41. Health
- 42. Housing related costs such as childcare, etc.
- 43. Identification services
- 44. Lack of regular internet access
- 45. Landlords not accepting pay and stay
- 46. NIMBYism
- 47. Prevention and diversion organizations utilizing HMIS

3rd Barrier(s):

Affordable and Available Housing Stock

- 1. Affordability
- 2. Affordability
- 3. Affordability
- 4. Availability of affordable rental housing
- 5. Cost and availability
- 6. Lack of affordable/safe options
- 7. Lack of available affordable housing
- 8. Lack of subsidized housing
- 9. Lack of voucher units
- 10. Not enough housing

Credit Checks & Background Checks

- 11. Access to banking/credit
- 12. Correctional system involvement
- 13. Credit and criminal history
- 14. Credit history/criminal record
- 15. Criminal backgrounds
- 16. Criminal History
- 17. Criminal history discrimination

Transportation

- 18. Lack of transportation
- 19. Location to Proximity to Job

- 20. Poor city planning, transportation, food, education, resources
- 21. Transportation
- 22. Transportation that allows working person to get child to daycare and to work without having to be on public transportation for hours at time on the way to and from work

Lack of Income or Inadequate Income; Lack of Job Opportunities

- 23. Accessibility to jobs
- 24. Job opportunities
- 25. Lack of employment
- 26. Lack of income
- 27. Lack of needed income

No Knowledge of Services

- 28. Inability to navigate the system
- 29. Knowledge of programs that could help them
- 30. Lack of knowledge of resources

Lack of Support Services

- 31. Coordination of affordable opportunities

- 32. Lack of government programs to create, produce, and preserve affordable housing units.
- 33. Not enough Social Services to provide help with utilities and rent

Mental Health Care

- 34. Lack of sufficient mental health care
- 35. Mental Health

36. Mental Health Assistance

Other Barriers

- 37. Discrimination on source of income
- 38. Education/skills
- 39. Employment
- 40. N/a
- 41. Previous evictions and records
- 42. Reliability
- 43. Rent/Credit/Criminal History

Question: Top Three Barriers to Affordable Housing for Persons with HIV/AIDS and Their Families

Responses:

1st Barrier(s):

Affordable and Available Housing

Stock

- 1. Affordability
- 2. Affordability
- 3. Availability
- 4. Availability
- 5. Availability
- 6. Availability of affordable rental housing
- 7. Cost
- 8. Cost and availability
- 9. Cost of housing in Davidson county
- 10. Down Payments
- 11. Housing Affordability
- 12. Lack of affordable housing
- 13. Lack of availability
- 14. Lack of available affordable housing
- 15. Lack of housing in the city
- 16. Lack of supply
- 17. Limited housing stock/availability
- 18. Limited supply

- 19. Small or non-existent inventory of affordable housing

Discrimination

- 1. Discrimination
- 2. Discrimination
- 3. Discrimination
- 4. Discrimination
- 5. Discrimination against nonviolent sexual offenders who made the Registry solely because of their status (Aggravated Prostitution, Failure to Disclose Status, etc.)
- 6. NIMBY
- 7. NIMBYism
- 8. Stigma
- 9. Stigma

Lack of Income or Inadequate Income;

Lack of Job Opportunities

- 1. Employment
- 2. Lack of income
- 3. Lack of income to pay rent

4. Lack of Stable Employment/Income/Financial Stability

6. Costs of medical services and medication
7. Mental Health Assistance

Cost of Medical Services

5. Assuming Affordable Healthcare and Prescriptions

Other Barriers

8. Funding options
9. Not enough info
10. Same as above

2nd Barrier(s):

Affordable and Available Housing Stock

1. Affordability
2. Affordability
3. Affordability
4. Affordability
5. Affordable housing options
6. Availability
7. Availability in desirable locations
8. Cost
9. Cost and availability
10. Lack of affordable housing
11. Lack of inexpensive housing
12. Lack of subsidized housing
13. Pricing

20. Lack of adequate income due to medical complications
21. Lack of income
22. Limited and unstable income

Lack of Support Services

23. Lack of services
24. Support

No Knowledge of Services

25. Awareness
26. Lack of knowledge of services

Credit Checks

27. Credit Checks
28. Poor credit

Other Barriers

29. Assuming access to fresh locally grown organic food.
30. Coexisting health needs
31. Financial Assistance
32. Housing related costs such as medicine, childcare, etc.
33. Lack of priority population status
34. Not enough info
35. Ongoing Health Issues/Co-occurring illnesses
36. Proximity to healthcare facility
37. Strict requirements to qualify

Discrimination

14. Discrimination if the person's status is known or suspected
15. Discrimination if they know HIV status
16. Discrimination toward the disease
17. Public perception
18. Stigma
19. Stigmatization

Lack of Income or Inadequate Income; Lack of Job Opportunities

3rd Barrier(s):

Affordable and Available Housing Stock

1. Affordability
2. Availability of housing stock
3. Lack of voucher units
4. Cost
5. Lack of affordable/safe options near health providers
6. Housing
7. Cost and availability

Lack of Healthcare

8. Access to healthcare
9. Access to healthcare resources
10. Lack of health insurance to treat their medical complications resulting in poor health or medical debt
11. Lack of insurance

Lack of Income or Inadequate Income; Lack of Job Opportunities

12. Living Wage
13. N/A
14. Not enough info
15. Rent/Credit/Criminal History
16. Stable income/financial opportunities

Discrimination

1. Discrimination
2. Discrimination
3. Discrimination on source of income
4. Discrimination/Stigma as a roommate/tenant
5. Fear
6. Possible discrimination preventing people from accessing the resources
7. Stigma
8. Stigma
9. Stigma/Fear of Neighborhood Retaliation
10. Stigma/stereotyping

Other Barriers

1. Awareness

2. Choice
3. Credit history
4. Inability to navigate system
5. Lack of knowledge of resources
6. Lack of rentals for those with criminal/credit issues
7. Lack of resources for ongoing rent

Question: One Recommendation for Increasing Coordination Among the Continuum of Care (COC):

Responses:

1. A central point of contact
2. Blurb about what members' organizations do
3. Clarity of leadership/processes
4. Common record keeping
5. Communication
6. Cooperative strategy
7. Coordinated case management services/decreasing overlap
8. Get everyone in one room and hash it out
9. Have actual working group or hired professionals
10. Have people with authority to implement change present, not just a placeholder employee
11. I don't have enough information in this area.
12. Include minutes in emails sent out
13. Maintain up to date information on services
14. Make information more accessible for all populations
15. More non housing community programs
16. MOU' to facilitate sharing information/staffings
17. On right track, continue effort
18. One stop shopping
19. Open HMIS system is a must
20. Outreach
21. Providers work together without excessive duplication of services offered
22. Require and implement participation of all COC stakeholders in coordinated entry process
23. Transparency
24. Vouchers for assisted living units

Question: One Recommendation for Increasing Coordination Among Housing Providers:

Responses:

1. A central point of contact
2. Additional Resources
3. CoC may want to make a sub group
4. Coordinated Case Management Services/decreasing overlap
5. Create more affordable housing
6. Education
7. Engagement
8. Financial support
9. Forums for different housing topics
10. Forums for help for landlords providing affordable housing
11. House the chronically homeless population regardless of background, rental history and/or credit
12. I don't have enough information in this area.
13. Increase availability of loans
14. Internet Site Specifically for Housing Providers
15. Introduce housing providers to potential renters as soon as person's need for housing is identified ex-Planned discharge date from prison or hospital- encourage provider to meet with potential renter several weeks ahead of discharge
16. Keep updated list and solicit housing providers
17. Lower barriers, improve access to housing
18. Lower Rent
19. MDHA should participate in the coordinated entry process for all its affordable housing, not just Section 8/HUD-VASH; Landlords should receive tax incentives for taking referrals from CES
20. More None Housing Community Programs
21. more of them
22. More sharing of housing resources/availability
23. MOU' to facilitate sharing information/staffings
24. Provide a central physical location for all housing searches & trained staff/volunteers to assist individuals seeking affordable housing through the entire process
25. Sharing landlords
26. Standard communications network
27. Support and provide incentives for partnerships

Question: One Recommendation for Increasing Coordination Among Local & State Government Agencies:

Responses:

1. A central point of contact
2. Adjust regulations on how they penalize persons who receive support services to attend job training- ex: person needs money to pay for transportation to go to training- they have rent raised or food stamps amount lowered; again a stable tiered level to allow persons in poverty to gradually pull themselves off of government assistance
3. Apply "systems" thinking to mitigate silo effect
4. Communication
5. Coordinated Case Management Services/decreasing overlap
6. Create own office
7. Encourage state legislators and council members to participate in committee work and immersion experiences
8. Engagement
9. I don't have enough information in this area.
10. Include HMIS participation requirement in grants
11. Increase Awareness of Specialties
12. Interactive website. Instead of having to go to each agency to find out what is going on.
13. More communication with agency leadership to determine policy priorities
14. More None Housing Community Programs
15. More representation of State in local planning bodies
16. More transparent waitlists for Section 8
17. MOU' to facilitate sharing information/staffings
18. Networking
19. Offer giant incentives to housing providers willing to invest in the recovery of this population
20. Provide more funding that is recurring and dedicated
21. Providing vouchers that can be used
22. Shared commitment to the problem and to solutions
23. Talk directly with people with disabilities and other diverse minority populations regularly
24. Transparency
25. Unsure

Question: One Recommendation for Increasing Coordination Among Health, Mental Health & Service Agencies:

Responses:

1. A central point of contact
2. Accessibility
3. Communication and resource coordination
4. Coordinated Case Management Services/decreasing overlap
5. Coordinated services with Housing Providers
6. Encouraging engagement
7. Greater sharing of HMIS information, ability to refer within HMIS
8. Have at least one mental health counselor in each public housing facilities
9. I don't have enough information in this area.
10. Incentives
11. Increase outreach and inreach and enter into coordinated entry
12. Individualize services for each person with a mental health need
13. Local providers are at table, state offices not, get them to table
14. More None Housing Community Programs
15. More participation in COC meetings/decision-making
16. MOU' to facilitate sharing information/staffings
17. Need more supportive housing
18. Open HMIS system!
19. Place with Coordinated effort
20. Provide follow up and support services that are less data driven and more human centered.
21. Provide more funding to increase the availability and accessibility of community-based services
22. support creation and maintenance of offices near people in need
23. Work w/ the CMs of other agencies for wrap around
24. Workshops providing network information

Question: One Recommendation for Increasing Coordination Among Persons Discharged From Health Care Facilities:

Responses:

1. A central point of contact

2. Agency access to housing providers through social workers
3. All hospital social workers should be trained housing navigators with access to HMIS, every ER should have a designated case worker to meet with anyone experiencing homelessness who presents
4. Case managers assigned to the person
5. Coordinated Case Management Services/decreasing overlap
6. Determine the gaps and apply proven innovative ways to fill them
7. Determine what agencies can actually accept folks straight from institutions, and better coordinate with them
8. Develop programs that provide support for the medically fragile
9. Direct access to housing resources
10. Ensure a housing plan is in place, link with coordinated entry system
11. Eradicating NIMBYism
12. Fast track to housing
13. Follow-up
14. For persons without family, ask if they will provide discharge plan with Metro Public Housing Social workers
15. I don't have enough information in this area.
16. More None Housing Community Programs
17. MOU' to facilitate sharing information/staffings
18. Need to find way to get hospitals to the table
19. Open HMIS system!
20. Provide a case worker to discuss options with the patient before discharge and ensure there is a plan before exiting the facility
21. referral resources
22. Resources
23. Social Worker more involved or Afford Housing Case Worker
24. Target home renovations to make independent living easier for those coming out of health care facilities
25. Work w/ the CMs of other agencies for wrap around

Question: One Recommendation for Increasing Coordination Among Person Discharged From Mental Health Facilities:

Responses:

1. A central point of contact
2. Afford Housing Case Worker

3. All discharges experiencing homelessness should have all prescriptions filled on site and be authorized for at least one refill
4. Case Management communication
5. Case Managers assigned to the person
6. Coordinated Case Management Services/decreasing overlap
7. Determine the gaps and apply proven innovative ways to fill them
8. Determine what agencies can actually accept folks straight from institutions, and better coordinate with them
9. Direct access to housing resources
10. Ensure a housing plan is in place, link with coordinated entry system
11. Eradicating NIMBYism
12. Fast track to supported housing with options to live alone or communally.
13. For persons without family, ask if they will provide discharge plan and follow up service with Metro Public Housing Social workers
14. Have a facility with access to housing providers through network
15. I don't have enough information in this area.
16. Link discharge orders to community based mental health services
17. More None Housing Community Programs
18. MOU' to facilitate sharing information/staffings
19. Need to find way to get MH hospitals to table
20. Open HMIS system!
21. permanent housing
22. Provide a case worker to help the patient create a circle of support outside the facility before discharged
23. Resource
24. Work w/ the CMs of other agencies for wrap around

Question: One Recommendation for Increasing Coordination Among Youth Aging From Foster Care/State Custody:

Responses:

1. A central point of contact
2. Afford Housing Case Worker
3. Allow young adults to be housed in state college dorms even at part-time status, create dorms at community colleges
4. Assignment of case community resource staff
5. Case Management communication

6. Connect employment, education, housing, health care, and other services to youth aging out of foster care to insure their stability at this particularly vulnerable stage
7. Coordinated Case Management Services/decreasing overlap
8. Determine the gaps and apply proven innovative ways to fill them
9. Ensure a housing plan and employment plan is in place 12/7/2018 4:50 PM
10. Have a plan and circle of support in place before exiting state custody based on the child's individual needs/goals
11. Housing Coordination Services and grants available
12. I don't have enough information in this area.
13. Incentives
14. Lots of work and regular check-ins
15. More None Housing community Programs
16. MOU' to facilitate sharing information/staffings
17. N/A
18. Not sure
19. Pre-plan with students and landlords for at least 6 months prior to 18th birthday to understand costs and to locate available housing options within days before the 18th birthday
20. Provide an added level of education and support, also with individual housing
21. Resources
22. Work w/ the CMs of other agencies for wrap around
23. Work with youth-focused agencies to better coordinate wrap-around services

Question: One Recommendation for Increasing Coordination Among Persons Discharged From Correctional Programs & Institutions:

Responses:

1. A central point of contact
2. Afford Housing Case Worker
3. Assignment of case community resource staff
4. Coordinated Case Management Services/decreasing overlap
5. Counseling
6. Create more programs like Project Return, Dismas House, etc. to serve this particularly population
7. Designated Prison counselor coordinates with long term transitional housing program and ensures identification (Social Security Card and some type of government recognized identification card with picture is provided to offender just prior to discharge

to include address where ex-felon will go to live with either family member or long term transitional housing with the condition that the individual obtains employment within 2 months of discharge

8. Determine what agencies can actually accept folks straight from institutions, and better coordinate with them
9. Discharge to meaningful programs that are comprehensive and packed with life skills and educational opportunities
10. Ensure a housing plan is in place, link with coordinated entry system
11. Eradicating NIMBYism
12. Establish working partnerships with correctional institutions
13. I don't have enough information in this area.
14. More None Housing Community Programs
15. More programs available to enter workforce
16. More re-entry opportunities
17. MOU' to facilitate sharing information/staffings
18. Need to be invited and required to be at the table.
19. Not sure
20. Provide a central location and specialist who can assist individuals with these specific needs
21. Resources
22. Screen all persons at entry to discover if they are experiencing or at risk of homelessness, offer to allow them a video appointment with a MSS caseworker prior to discharge
23. Single Room Occupancy Housing Units
24. Work w/ the CMs of other agencies for wrap around

Question: Rating Discharge Coordination Procedures

Responses:

Weak (0) Average (50) Strong (100)

- Weak (35) – Persons Discharged from Health Care Facilities
- Weak (33) – Youth Aging From Foster Care/State Custody
- Weak (27) – Persons Discharged from Mental Health Facilities
- Weak (27) – Persons Discharged from Correctional Programs & Institutions

Question: Rating Coordination for Addressing Homelessness: Among The Following

Responses:

Weak (0) Average (50) Strong (100)

- Average (49) – Continuum of Care (CoC)
- Weak (38) – Health, Mental Health & Service Agencies
- Weak (34) – Local & State Government Agencies
- Weak (31) – Housing Providers

Question: Additional Comments/Suggestions for The 2019 Action Plan

Responses:

1. Communication and coordination of individual and community resource information will be the core of any successful strategy.
2. Coordination is a key aspect of building an improved system. And only if we open and support the Homeless Management Information System are we fully able to measure progress and increase community funding from all sources.
3. Give priority for rental assistance to folks at high risk of homelessness.
4. I think that any CDBG funds allocated to rental rehab should be used to incentivize those landlords to participate in the Section 8 program.
5. I think the overall plan is good and addresses majority of the community needs. I wish there was more funding. More funding larger impact.
6. It is good to have input, but there is a need to prioritize affordable housing in the same way that we have prioritized downtown development.
7. Nashville is focused on high-end development and has overlooked its historical urban residents
8. Need more affordable housing for individuals with mental disabilities
9. The community is grateful to MHDA for their incredible work and leadership in Davidson County to support affordable housing for all.
10. We all know we need to push forward. But, we must also fix the foundational systemic issues that are holding us all back from our progress. The discord in our COC is the elephant in the room, and it comes from a fear of being irrelevant/defunded: we must first acknowledge that all providers/services have a place in our community, but we may all need to adjust our internal programs/processes to be a greater team player. This needs to be done in a dynamic, direct way, and not in a way that others agencies who do not now/have never received HUD funding- the current dialogue has oftentimes been excluding those agencies, and it simply pushes them further from the

COC vision and trajectory. We need to pull everyone in and understand all needs/concerns so all stakeholders are considered/heard, and thus we can continue to move forward together. Relationship building is a KEY missing component in these last year's conversations. We are only as strong as our weakest (most resistant) player.

11. We are appreciative to MDHA for its continued efforts at providing safe, decent and affordable housing.
12. Work on reframing the message about the lack of affordable housing. I think many equate affordable housing with public housing, which they equate with slums and/or high crime. Many people paint it all with a broad brush, and it is not always the truth. Work more closely with the Promise Zone group to work on the action. Coordinate with them.

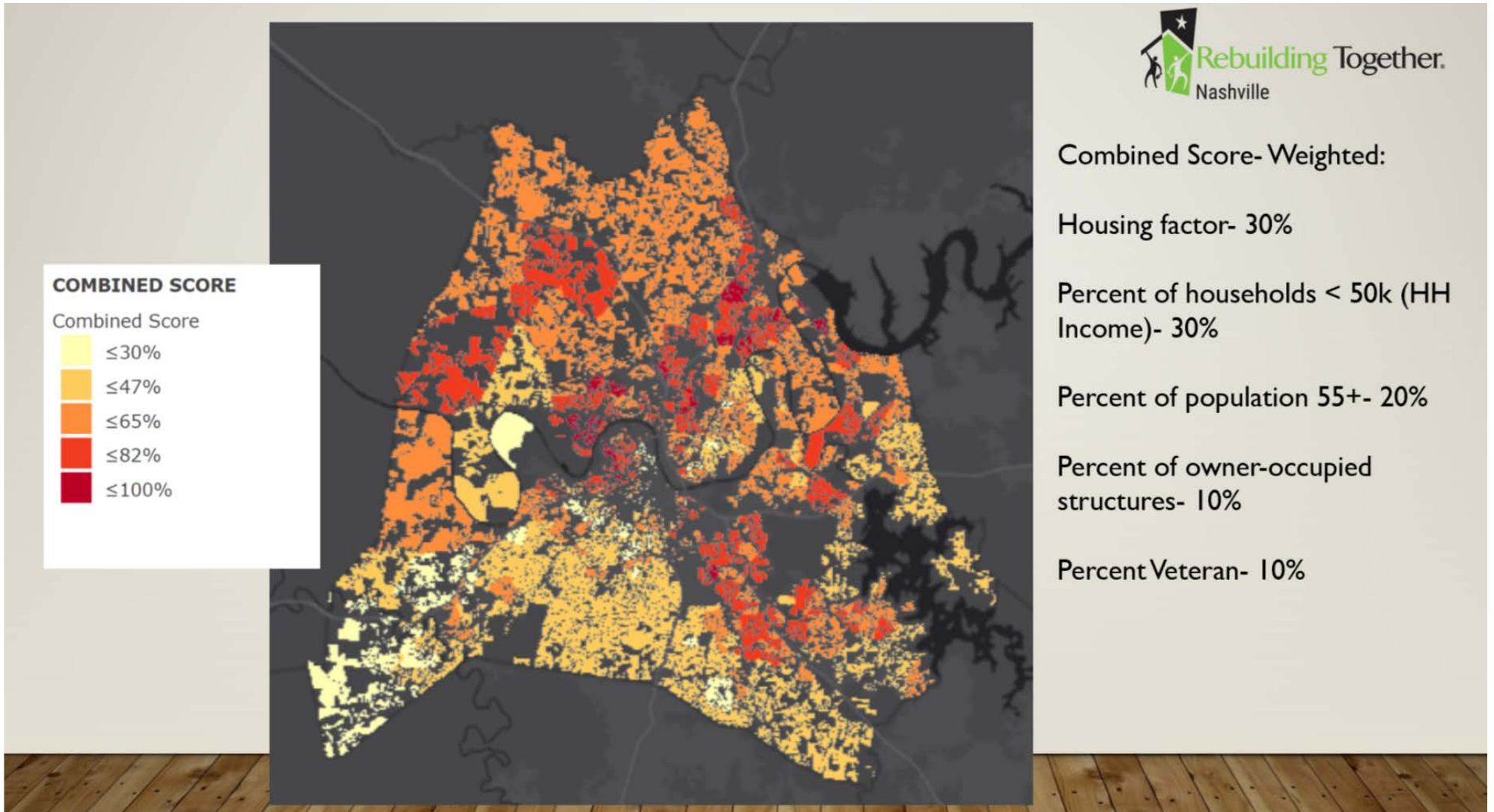
Public Comment & Document Submission:
12/6/2018
“Madison Strategic Plan” & “Madison Real Estate for Sale”

Comment: Citizen expressed frustration with continuous community planning and negotiating by Nashville-Davidson leadership with no follow through. A summary of their thoughts and submitted documents below:

- In Madison there is sufficient land to provide affordable housing solutions for the housing demand in Nashville. However, developers are not coming into Madison because of the draw of the housing market and a lack of support from Nashville-Davidson leadership.
- A Madison Strategic Plan was prepared 2018 by Randall Gross / Development Economics for All Together Madison and the Madison Community. This plan outlines the housing, economic and community development opportunities that would benefit Davidson County as a whole.

**Copies of the “Madison Strategic Plan” & “Madison Real Estate for Sale” were provided for reference. Due to the volume of data, please contact the Community Development Department by phone at 615-252-8505 or by email at consolidatedplan@nashville-mdha.org to request to view these documents.*

Public Comment Document Submission:
12/10/2018
“Rebuilding Together Index”



As Nashville has boomed in the last several years, our neighborhoods and low-income neighbors are facing new and mounting housing challenges and economic pressures. This rapidly changing landscape has led Rebuilding Together Nashville to think innovatively and strategically about how to invest our limited resources to help address emerging affordable housing and community building needs. We have concluded that focusing our next effort on a target community rather than continuing to spread our work county-wide is both the most efficient use of our agency’s resources and will ultimately allow us to make a larger impact.

This past year, we designed a mapping analysis in partnership with Nashville’s Planning Department and a graduate student at TSU that helped us identify five neighborhoods that have highest concentration of homeowners with critical home repair needs, aging populations, and highest rates of poverty: Bordeaux, North Nashville, the Dickerson Pike Corridor, Madison, and South Nashville. Our next phase of analysis involved getting ‘boots on the ground’ in these communities to better evaluate their home repair and placemaking needs by training volunteers and members of our Board to perform windshield surveys. They helped identify community assets (churches, community centers, schools, businesses, etc.) that may serve as partners, the state of the local housing market, and overall housing stock quality. Along with these surveys, we have been meeting and strategizing with city-wide stakeholders to identify what target neighborhood will be the next ongoing focus of our work. We strongly believe that a targeted neighborhood approach will also allow us to build more meaningful, long-term relationships with partners within a targeted area and focus our work on achieving shared, community-wide outcomes.

This in-depth analysis led us to select the Bordeaux-North Nashville area of Nashville as the community to target our efforts. This area overlaps with the “CDBG Target Areas” and the 14 Housing Target Areas identified in the 2018-2023 Consolidated as priority areas where CDBG funds will be targeted for neighborhood investments and home rehabilitation assistance.

APPENDIX D HOPWA

CONSULTATION SUMMARY

Housing for Persons with HIV/AIDS – 2019-20 Action Plan Consultation Comments and Analysis

MDHA hosted a consultation meeting for Nashville-Davidson County HOPWA sponsors and stakeholders on November 27, 2018. 6 people attended, representing three (3) area sponsors and one (1) additional HIV/AIDS provider/stakeholder in the community.

This discussion was specific to housing and services needs for people living with HIV/AIDS in the area. The discussion was an open roundtable format, with members providing thoughts and ideas regarding the current state of services for the HIV/AIDS population as well as suggestions for future funding opportunities to better serve their clients.

The following are comments, questions and suggestions made during the discussion.

- Ryan White Part A is under new leadership. Ryan White will possibly pull back on the amount of funds previously provided for case management. Is it possible for HOPWA funds can be used to more case management services?

MDHA Response – Yes, that is an allowable expense. Sponsors just need to provide the appropriate documentation for case management assistance.

- Is it possible to look at creating an employment assistance program for future HOPWA funds? 50% of our client assistance goes to those that either cannot get or keep a job. We suggest possibly a financial empowerment position for employment assistance case management (financial coaching).

MDHA Response – Employment assistance is an allowable expense under the Supportive Services activity for HOPWA. We will review the HUD regulations to see what parameters would possibly allow such assistance.

- Ryan White Part A is writing a grant in 2019 for UBER Health which coordinates free/inexpensive transportation for HIV/AIDSs clients. The grant will request \$100,000 for 2 years. This could be helpful for your HOPWA clients in the MSA.

MDHA Response: Thank you. That would be a very beneficial type of assistance in our MSA communities. Please keep us up informed regarding the grant status.

- Can we look at additional transportation services for employment interviews/getting a job? Are other agencies in other States using something similar? I heard possibly

there are some programs in Portland, OR that may be a good source of data sharing regarding similar programs and results.

MDHA Response: We will research additional programs in other communities in the future to see what transportation assistance programs are allowed under HOPWA and how they are coordinated.

- Are any sponsors in the MSA offering disability passes?

Answer – Yes, Nashville CARES has a program.

- We are again expressing interest in tenant based rental assistance (TBRA) activity under HOPWA housing assistance for our MSA clients. With the high cost and limited housing opportunities in Nashville-Davidson County, it may be prudent in the future to provide more housing opportunities outside the greater Metropolitan area and into our MSA communities. Landlords in Davidson County are not as steady as in the past and are more reluctant to provide housing to our clients, who can be among the most vulnerable due to stigmas, criminal records, etc. TBRA could provide more opportunities. The State HOPWA program has started rolling out some TBRA assistance. However, current funding is only set through June 2019. What happens when/if it is not renewed? It might be possible for sponsors to look at other cities that have incorporated TBRA for HOPWA clients (such as Houston, TX) to get an idea on the necessary forms, standards, etc. under the HOPWA regulations. Maybe a sponsor could start a very small program of only 1-5 units initially until they build better capacity. However, there are some issues with the TBRA program as well. One of the biggest issues is transportation. If they move out of the Nashville-Davidson County core, they may have more difficulty with transportation access to Doctor appointments, etc. Maybe some of the transportation suggestions made today could help with that. Also, by moving out into the larger MSA area, the client can find possibly cheaper rents. However, they also will find that the income limits are stricter/lower in the more rural areas and suddenly they are over income and are not allowed assistance. It's a lot to consider, but we feel we should pursue potential avenues in the future.

MDHA Response: These are all valid points for and against expanding our HOPWA funding to including the TBRA activity to future HOPWA funds. We will continue to review the possibilities and may begin including TBRA as a possible activity in our action plans – with strict caveats in our RFA process to meet HOPWA requirements and ensure sponsor capacity prior to any approval of funding for a sponsor.

- Is it possible to include new units in affordable housing construction to be specifically set aside for HIV/AIDS clients?

MDHA Response: MDHA will review what is eligible under HOME affordable housing construction guidelines and will consider presenting the encouragement of such designations if allowed.

APPENDIX E PUBLIC NOTICES

PUBLIC NOTICE

REQUEST FOR PUBLIC COMMENT AND NOTICE OF PUBLIC HEARING

SUBSTANTIAL AMENDMENT 1 TO THE 2018-2023 CONSOLIDATED PLAN FOR HOUSING AND COMMUNITY DEVELOPMENT AND 2019-2020 ANNUAL UPDATE FOR PROGRAM YEAR TWO (2019 ACTION PLAN)

Public Hearings: The Metropolitan Development and Housing Agency (MDHA) will host a public hearing on the draft Substantial Amendment 1 to the 2018-2023 Consolidated Plan for Housing and Community Development and 2019-2020 Annual Update for Program Year Two (2019 Action Plan) on:

Tuesday, April 23, 2019 5:30 p.m.
Randee Rogers Training Center
1419 Rosa L. Parks Blvd.
Nashville, TN 37208

Public Comment Period: Beginning Thursday, April 11, 2019, the draft Substantial Amendment 1 and 2019 Action Plan will be available for public examination and comment. Members of the public may download copies from MDHA's website at www.nashville-mdha.org/consolidated-plan or may request copies by contacting the MDHA Community Development Department at 615-252-8505 or TDD at 615-252-8599. Also, copies will be available at MDHA's Community Development Department, located at 712 South Sixth Street, Nashville, TN 37206, between the hours of 7:30 a.m. and 4:00 p.m., Monday-Friday. MDHA will receive written comments through 4:00 p.m., central time, on Wednesday, May 15, 2019. Comments may be submitted electronically at consolidatedplan@nashville-mdha.org, faxed to 615-252-8533 (Attention: Consolidated Plan), mailed to MDHA Community Development Department, Attention: Consolidated Plan, P.O. Box 846, Nashville, TN 37202, or hand-delivered to MDHA Community Development Department, Attention: Consolidated Plan, 712 South Sixth Street, Nashville TN 37206.

Purpose and Summary: MDHA has prepared for submittal to the U.S. Department of Housing and Urban Development (HUD) a draft Substantial Amendment 1 to the 2018-2023 Consolidated Plan for Housing and Community Development and the 2019-2020 Annual Update for Program Year Two (2019 Action Plan). The draft Substantial Amendment provides for the following: 1) Allows 2019 HOPWA funds to be used for tenant based rental assistance (TBRA) and emergency hotel/motel assistance; and 2) Adds language to the description section of the Strategic Plan (SP) 25 Priority Need #3 – Retain Affordable Housing Stock of the Consolidated Plan to clarify that the amount of CDBG funds to be allocated to this Priority Need will be a least 50% of the annual allocation after deductions for the 20% allocation for Administrative Activities and 15% for Public Service Activities.

The 2019 Action Plan describes community needs and funding priorities for the 2019-2020 program year (June 1, 2019 through May 31, 2020) and serves as Metropolitan Nashville-Davidson County's application for receiving funds for the following programs: Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), the Emergency Solutions Grant (ESG), and Housing Opportunities for Persons with AIDS (HOPWA). Proposed funding allocations are intended to address the priority needs identified in the 2018-2023 Consolidated Plan, as amended, and to benefit low- and moderate-income households and areas. Details regarding specific activities to be funded are provided in the 2019 Action Plan.

Funding Priorities:

- Increase the number of decent, safe affordable units and help LMI households access affordable housing
- Preserve existing affordable housing units and help LMI tenants and homeowners retain housing

- Support facilities and services for the homeless and persons with HIV/AIDS
- Create pathways to self-sufficiency for LMI persons and families
- Revitalize distressed neighborhoods and underserved areas.
- Undertake grant management, planning, and other eligible administrative tasks authorized under CDBG, HOME, ESG and HOPWA

Anticipated Resources:

	CDBG	HOME	ESG	HOPWA
2019 Allocation	\$5,095,429.00	\$ 2,581,408.00	\$417,516.00	\$1,216,011.00
Estimated Program Income	\$ 250,000.00	\$ 342,000.00	\$ -	\$ -
TOTAL	\$5,345,429.00	\$ 2,923,408.00	\$417,516.00	\$1,216,011.00

2019-2020 Proposed Allocations:

CDBG	
Project Type	Proposed Budget
Administration & Planning	\$ 1,069,085.00
Public Services	\$ 709,461.00
Housing	\$ 2,672,715.00
Public Facilities & Infrastructure	\$ 894,168.00
TOTAL	\$ 5,345,429.00

HOME	
Project Type	Proposed Budget
Administration	\$ 292,340.80
Homebuyer Programs	\$ 438,511.20
Homeowner Rehabilitation	\$ 0.00
Rental Programs	\$2,192,556.00
TOTAL	\$2,923,408.00

ESG	
Project Type	Proposed Budget
Administration	\$ 31,313.70
Emergency Shelter & Transitional Housing; Rapid Re-Housing; Street Outreach; Prevention;	\$ 365,326.50
HMIS	\$ 20,875.80
TOTAL	\$417,516.00

HOPWA	
Project Type	Proposed Budget
Administration	\$ 121,601.10
Facility-Based Housing Assistance; Short-term Rent, Mortgage & Utilities; TBRA; Supportive Services	\$1,094,409.90
TOTAL	\$1,216,011.00

Request for Accommodations: MDHA makes every effort to provide reasonable accommodations to assist persons with disabilities. Any person needing assistance in accessing this information or who has other needs that require special accommodations may contact 615-252-8562 or TDD at 615-252-8599.

Para asistencia en Español llame al 615-252-8505.

如果需要本通知的中文翻译，请打电话 615-252-8505

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

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

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

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



APPENDIX F SUMMARY OF PUBLIC COMMENTS AND MDHA RESPONSES

Comments/Questions received at the April 23, 2019 Public Hearing -

1. Comment/Question: I have a question about employment in the priority area Napier area. Unemployment there is very high. I am wondering if some of the employment opportunities that you've mentioned could be focused somehow on the unemployed folks in that priority area?

Response: To give more detail, it is connected to LMI persons associated with housing, construction and redevelopment projects being undertaken by MDHA in our housing target areas (which includes Napier Sudekum) with the goal to provide Section 3 Employment Opportunities for residents of MDHA housing. The program involves outreach to residents to inform them of available opportunities and assist them with processing any paperwork to be put on the appropriate registers/lists to be eligible to be counted as a Section 3 employee or business so they will receive notification of Section 3 employment opportunities as they become available. We want to reach to them to let them know they are available and help them through the process of getting in the Section 3 program. What this activity does is walk them through the process of making sure that they're in the right system. If they want to be a vendor, if they're a painter and want to be on the section 3 list as a vendor to be contacted for certain jobs, it helps them learn how to do those things. Certainly we will take your comment to heart and consider other programs as well in the future.

2. Comment/Question: Thank You.

3. Comment/Question: Could that be translated to mean that you've got a program to employ residents for painting and repair of the housing?

Response: I'm not sure it's specifically for that purpose.

Additional Response – Post Hearing:

Section 3 is a policy created by Congress to guarantee that the employment and other economic opportunities created by Federal financial assistance for housing and community development programs should, if possible, be directed toward low- and very-low income persons, particularly those who are recipients of government assistance for housing. MDHA has a longstanding history with the Section 3 initiative, with contractors using employment consultants to assist with meeting the hiring goals of the initiative. In light of the construction projects created by implementation of Envision Cayce and those anticipated in the coming years, MDHA saw an opportunity to expand that impact and created a position dedicated to preparing residents for jobs created by that activity. The Section 3 work readiness coordinator works with residents to remove barriers to employment, referring them job training programs, and connecting them to those job opportunities.

Barrier removal is an integral part of the job of the Section 3 work readiness coordinator, and to that end, we assist with driver license reinstatement, expungement, resume creation, interviewing skills, as well as creating partnerships with contractors that may allow for second chance hiring of those with background issues and for additional “coaching up” while employed to increase chances of success.

4. Comment/Question: Tell me what the program does to employ people?

Response: It is geared towards helping MDHA residents obtain work on the large construction or rehabilitation projects being undertaken by MDHA in our housing target areas. I can provide a further detail in the final draft of the 2019 Action Plan. I do not think it as simple as just hiring out a person for painting in a housing unit. I think it is more specified for larger work projects.

Additional Response – Post Hearing:

The program does four things to prepare and connect residents to employment opportunities:

1. Work with residents to address barriers that have historically limited employment opportunities such as assisting with driver license reinstatement, expungement, resume creation, interviewing skills, etc.
2. Connect residents to job training programs that align with forecasted job opportunities.
3. Connect residents to job opportunities through direct outreach and with job fairs.
4. Identify resident-owned businesses that qualify as Section 3 businesses, as well as businesses that employ the requisite percentage of Section 3 employees so that they are eligible for contracts through the agency, which increases employment options on two fronts.

5. Comment/Question: There is a description of an employment program, okay. What are they going to be employed to do? How are you going to help them? Having heard what I’ve just listened to I might be inclined to think that this is some kind of assistance to get them hired by a contractor who’s building an MDHA or rebuilding an MDHA building. What does this program do? That’s kind of the boiled down version.

Response: This program is designed to provide MDHA residents with training opportunities to try to get them employed through various opportunities that are going on with the construction projects that MDHA has going on right now. They could translate over to any of the other trainings or opportunities; they could translate into other construction jobs too. But, that is the primary purpose, is to provide them with services training and etc., so they can take advantage of some of these opportunities.

Additional Response – Post Hearing:

Please refer to the answer/response to Comment/Question #3.

6. Comment/Question: Teach them how to use a skill-saw, be a carpenter, and then get a job with a sub-contractor?

Response: That's kind of the goal. That's not the service we are providing, via this, we are trying to connect them with those kind of training services.

Additional Response – Post Hearing:

Please refer to the answer/response to Comment/Question #3.

7. Comment/Question: Through the two new colleges?

Response: I don't have that specific answer. We can get that specific answer for you and provide it in the final draft of the 2019 Action Plan.

Additional Response – Post Hearing:

The coordinator works with a partner network which, as it grows will include a variety of partners in education, as well as other sectors. Acknowledging that each person's needs are different, the goal is to connect with ANY available training opportunity, including community colleges, vocational training, unions, and apprenticeships, allowing residents to be connected with services and training opportunities that are customized to their needs.

8. Comment/Question: I want to follow up on the Section 3 thing. We have projects going on at Cayce Homes; Hardaway construction is working on a project. And we also have RG Anderson. RG Anderson has been working on the Kirkpatrick Homes. Could you tell me how many Section 3 people are employed with that?

Response: I cannot at this point. That is something that we might be able to get you.

Additional Response – Post Hearing: Kirkpatrick Park project started construction in November 2017. As of October 31, 2018 there have been 41 new Section 3 hires in the project.

9. Comment/Question: Is Community Development working with the Construction Department on this specifically?

Response: We are not working specifically with the Construction Department at this point in time. This is a program that started this year within the past six months. What we are trying to do through this program is provide counseling services to connect them to jobs, primarily Section 3, HUD funded jobs that are going on at MDHA properties. I do not have specific information on the results as of yet because it is a new program. This is the first time we have ever funded it.

10. Comment/Question: The Section 3 program with HUD has been around for a long, long time. To the degree that MDHA has not gone out and actively recruited people in this program is something we've talked about Section 3 for a long time. I think the minority community has been

very, very interested in this and they've tried through the minority business council to get more jobs through construction, and frankly they've been pretty disappointed. I hope the NAACP and other people can work together. There are people looking for those jobs; and I've gone over to those work sites and I haven't seen any poor people working at those sites that I've seen.

Response: I'm going to let our Communications Director address that.

Response: Communications Director - This is a new program under CD, we still do offer Section 3, within MDHA. We have someone leading that initiative and we work with Morgan and Morgan Technical Consulting to get the word out. What I know of in the last 8-9 months, we've had at least 4 events at our properties inviting people to come and attend job training sessions and job fairs. Typically we will do one flyer for both of those and we'll try to do the job training on Tuesday and the job fair on Wednesday so that they can get training and come right back to the job fair. So, we do have those opportunities for residents again we're passing out flyers to our residents on that and passing it to all of our properties.

11. Comment/Question: So of the 5,000 units, you've sent out 5,000 flyers talking about Section 3 opportunities? Is this that what you are saying?

Response: Communications Director - We have done that in the past, what we've done more recently is send out flyers to the Cayce residents and sent flyers to all of the properties, so that they can post it inside their management office.

12. Comment/Question: Okay, I haven't really seen that stuff, but you know. We'll look for it. Just a follow up too. You had some amendments, I didn't see it in my packet or whenever else, the HOPWA program you're expanding the eligibility for? Could you clarify that up a little bit?

Response: We're expanding the eligible activities. When we had consultations with the HOPWA Sponsors that serve the clients in the area, they expressed that in addition to: facility based rental assistance, Short Term Mortgage Rent and Utility Assistance (STRMU), permanent housing and supportive services; they would like to eventually be able to potentially provide Tenant Based Rental Assistance (TBRA), as well. Because of the housing market and how difficult it is to find landlords within Davidson County in to rent to HOPWA clients; because it serves the Metropolitan Statistical Area, they wanted to at least entertain the idea of possibility offering clients vouchers outside of Davidson County if they wanted them.

The substantial amendment is to include it as an eligible activity. It will be included as an eligible activity when we release our Request for Applications.

13. Comment/Question: Okay, currently with HOPWA you're not doing anything with rental assistance. You're going out there; you're providing funds for...

Response: We still have facility based rental assistance.

14. Comment/Question: Okay, so when you say facility can you be more specific? Are you talking a landlord tenant relationship or what?

Response: Urban Housing Solutions provides permanent housing for HOPWA Clients and at least 53 units in their properties. Again, the STRMU assistance also provides rental and mortgage assistance to HOPWA clients anywhere they live.

15. Comment/Question: So the 53 that you are housing through Urban Housing are Section 8?

Response: No they are not Section 8. It's based on income limits for HOPWA and is direct assistance provided via HUD HOPWA funds for the 53 units that Urban Housing Solutions operates.

16. Comment/Question: That's what I need to clarify. HOPWA is specific program so it doesn't go through Norman Deep [MDHA] it goes through somebody else, correct?

Response: Right.

17. Comment/Question: Okay, so the administrator of that – So somebody [who] has a diagnosis of HIV AIDS would go to apply for that, they would go through who?

Response: They would go to our sponsors that receive funds from us directly, including Nashville Cares, Urban Housing Solutions, and Meharry Medical. Again, our typical HOPWA sponsors.

18. Comment/Question: Gotcha thank for that clarification. The other substantial amendment was regarding that you said that Community Development, that Rental Rehab was 50% but you didn't deduct the 20% Admin. So that's the only thing, it was just clerical thing..? [Inaudible]

Response: What we put in the Consolidated Plan last year was that we would dedicate 50% of our overall CDBG allocation to housing based activities. What we wanted to clarify is that 50% is after we've taken out the Administrative 20% percent and after we've taken out the 15% for Public Services. Then 50% of what is left goes to housing based activities, which includes Homeowner Rehab, Rental Rehab, etc.

19. Comment/Question: On slide 17, because you have some numbers that are there, the problem that I have is that you have some that are; it seems to me, bunched together.

Response: I know, it's a very involved slide, I'm sorry.

20. Comment/Question: Well on some of these slides it would be interesting if you could just go out and list the percentage, I'd like to know as far as the ESG percentages, as far as street outreach goes. And some other things, Rapid Rehousing, Homeless Prevention, if you would have that ESG and have your proposed plan percentages would really be helpful.

Response: We can't do a percentage because the percentages for ESG and HOPWA funds are based on the requests received from the applicants through the Request for Application (RFA) process. We don't sit and say, "We only going to give 20% to Rapid Rehousing, we're only going to give 20% to prevention." When we get the applications in and see the request for assistance we base it on our allocation, our scoring matrix for the

allocations and the amount of the requests to determine how much will go to rapid rehousing, or prevention. So if we have \$300,000 dollars of the ESG funds to go out to an RFA, we don't say "Of that \$300,000 we're going to dedicate \$100,000 of that to Rapid Rehousing. We don't limit it that way."

21. Comment/Question: You use an RFA rather than RFP (Request for Proposals)?

Response: Request for applications, yes.

22. Comment/Question: I just think a procurement when you're going to go out there and you're going to do an RFP you say these are the funds that are available for this thing, rather than just kind of leaving it open.

Response: Well we say the funds are available for all the activities that are available. Our Consolidated Annual Performance Evaluation Report (CAPER) will provide detail on which activities were funded. Additionally, after we've awarded funds for the year, we would be able to provide the percentages if you want to see those numbers.

Response: Actually doing it this way provides more flexibility for the agencies because it kind of lets them dictate the demand, based on the need that they know is out there. So it's worked really well.

23. Comment/Question: Could you do reallocation?

Response: If there's not sufficient demand, but we have not run into that yet.

24. Comment/Question: Thank you.

25. Comment/Question: Does a request for application lead to more apples to apples comparison of potential vendors or services compared to the RFP for proposals, which might result in apples and oranges?

Response: It's really just a terminology change. What we have is specific questions designed towards our HOPWA and ESG programs that we put in an application format. It's more formalized than a general request for proposals where the applicants would submit their own responses, under a general guideline, for requesting funds. We call it an application because we have specific data items and specific questions that every candidate must answer in an application format.

26. Comment/Question: Wow, I was hoping the apples to apples comparison would work. It's got a nice ring to it. But, go ahead, who's next?

27. Comment/Question: Can we get a copy of the presentation electronically?

Response: Yes we can do that and post it on the website as well.

28. Comment/Question: Okay, if you post it that's great.

29. Comment/Question: You might have alluded to this already, you said a CAPER is coming out, that your results?

Response: Every year we have to put out an Action Plan that says what we anticipate doing with funds for the year, at the end of our program year we have to put out a report that says what we accomplished. Our current program year ends May 31, 2019. We will have until the end of August to do a report that gives numbers and budgetary information on what we achieved during that program year. So we will issue the CAPER report for the 2018-2019 program year at the end of August.

30. Comment/Question: Can we get the 2018 version of the annual update report?

Response: The 2018 Action Plan is included in our overall Consolidated Plan which is still on the website.

31. Comment/Question: The equivalent of this report from last year is on the website?

Response: It is interfolded in the five year Consolidated Plan. So it is located inside the consolidated plan.

32. Comment/Question: Okay, in general have the numeric goals changed much from year to year?

Response: They have not. They adjust slightly, but they have not. Actually, the Consolidated Plan has strategic goals for the total five years so if you look at the Consolidated Plan you will see what the overall goals are across five years with the anticipated budget that we had in 2018.

33. Comment/Question: How often is this stuff, intertwined with the Envision processes, is there a way to know that one way or another?

Response: I am not sure. That's a question I will have to look into it and do a response in the final draft. I could not say at the top of my head.

Response: This is separate from the Envision processes because these are different activities. Again we may have some activities in here that relate to some of the things that are going on with the Envision Process. But this is a separate process it's not intertwined.

34. Comment/Question: Okay, regarding the plan, executive summary ES-11. Under partnership with MDHA and Metro Homeless Impact Division first paragraph, line 3. It says: "The City's Homeless Impact Division of Metro Social Services is the designated entity for planning and coordinating efforts to address homelessness locally." As the CoC Collaborative Applicant, aren't you the designated entity for planning? I think that's in your grant agreement. I think that's what your grant agreement basically says.

Response: I will have to defer to either someone else or look that up and get back to you.

Additional Response – Post Hearing: The CoC Collaborative Applicant is eligible applicant that has been designated by the CoC to apply for a grant for CoC planning funds on behalf of the CoC.

35. Comment/Question: Okay, It also talks about dividing responsibilities for staff and Ad Hoc Committee and CoC general memberships. We really need to have a custodian of records. One person, one point of contact, where you can get everything that you need for all CoC activities. Not scattered all over the place; which is apparently what we have at this time.

Response: Thank you for your comment. We will definitely make note of that.

Response: As you are aware, these items are currently being discussed by the CoC Charter Review committee and will be resolved via additions/clarifications to the CoC Charter that will be voted on by the CoC General Membership.

36. Comment/Question: Okay, next question, under there the second paragraph talks about the 18 housing choice vouchers per month and it says “it began in 2013, with over 892 people have received a voucher”. It doesn’t say how many were housed, because some people get vouchers but aren’t housed. So, could you get that later in the comments and get answer regarding how many people have been housed?

Response: I will confirm if those are actual people housed or if those are just vouchers. Will we will get that answer for you.

Additional Response – Post Hearing: We don’t have the exact #, but as of April 29, 2019, 927 vouchers have been issued and of those, 542 leased, which is just under 60%.

37. Comment/Question: Okay I would appreciate that. Next thing, on paragraph three, the CoC has created different committees that work on filling gaps and addressing specific populations. I’m not sure that we have an inventory on how many CoC committees that we have. Certainly if we had a custodian of records I could go out and check to see what activities are being done by the various committees. I would like to have that issue resolved because right now it is not. That is of great importance to me. I do not know what committees are doing unless I can go to a custodian of records and get all the information that I need. And as a CoC member, I am actually here tonight demanding that because we simply cannot do business like that.

Response: Thank you for your comment we will make note of it.

Response: Again, as you are aware, these items are currently being discussed by the CoC Charter Review committee and will be resolved via additions/clarifications to the CoC Charter that will be voted on by the CoC General Membership.

38. Comment/Question: The other thing is that it talks about here, increase housing first approach. I would like to have the numbers, because I don’t have a dashboard here. Of anything. I would like to know how many programs are using the housing first approach in Nashville Davidson County.

Response: We will try to find that information.

Additional Response – Post Hearing: In the 2018 CoC and ESG competitions, 8 agencies that submitted applications for funding identified their programs as meeting HUD's qualifications for low barrier projects.

39. Comment/Question: I would appreciate that. Okay, Title 24 Part 578, the CoC must create a board. We currently have planning council. Which to me is not complying with federal regulations. A board would mean: a board of directors, a board of trustees, a board of governors. You have all sorts of boards; but we have planning council. So when somebody, fills out a conflict of interest form that says: "Do you belong on any boards or commissions?" a person could go out and say no; because a planning council is not called a board or commission. You are required by HUD to have conflict of interest policy. But we have people, currently, who are on the planning council and are also on the board of directors for THDA. Are you aware of that?

Response: Thank you for your comments. However, most of these questions/comments do not pertain to the reason we are here tonight.

Response: These items have been addressed by the CoC charter review committee and the planning council structure to act as the CoC governance body was approved by the CoC General Membership via a vote on and approval of the CoC Charter in May, 2018.

40. Comment/Question: Correction, if I may. I'm talking about Title 24 Part 578 for the federal regulation that says: 'A CoC must create a board.'

Response: Thank you for your comments.

Additional Response – Post Hearing: A search of the word "Council" in the Thesaurus: English (U.S) defines Council as an assembly, meeting, "Board", body, convention, association, congress, committee, commission, and/or ruling body.

41. Comment/Question: Federal regulation supersedes any sort of ordinance or resolution, whether it is passed by the Council or it is passed by the CoC general membership, without knowledge of the federal regulation. It is null and void.

Response: Again, Thank you for your comments. We will forward them to the applicable party. Thank you.

42. Comment/Question: We have money that is going to Homeowner Rehab. Habitat for Humanity has a huge program for that. We have tremendous amount of duplication. We doing things that the Parks and Recreation Department should be doing, as far as Summer Youth. The Youth Opportunity is a Mayoral Opportunity that is supposed to be funded by...

Response: Yes, we work in collaboration with the Mayor's Office on the Youth Opportunity program.

43. Comment/Question: Yes but, the idea of federal funds coming here to target low income. Now we've expanded that to say: "Okay we're going to go out and we are going to ask your eligible

for low and moderate income.” I would like it to read that: “You’re eligible for low and moderate income, but we have a focus on low income.” And the reason for that is, because you are targeting funds and if you target funds to a lower income population, I think you are doing what the program was designed to do, was to help people who are basically low income. Because under your definition of moderate income, you could be making over the median income in Nashville-Davidson County. Correct?

Response: The definition of low to moderate income is people that are below 80% of the Area Median Income (AMI).

44. Comment/Question: So you’re saying if you make a 101% of the Area Median Income you do not qualify?

Response: You do not qualify. You have to make equal to or below 80% of the Area Median Income to qualify as low - moderate income.

45. Comment/Question: So extremely low income is probably less than 40%, low income is probably maybe 50%

Response: 30%, 50% and 80%

46. Comment/Question: So you’re saying your cut off is at 80%. Okay. That’s fine.

Response: Yes.

47. Comment/Question: Habitat for Humanity has Aging in Place, and all sorts of programs and they have been consulted on this plan. And for them to go out there and be consulted on this plan, and say: “Well if you have any free money to give we’ll take it.” I mean any organization would go out and do that. I can get all the organizations that you want and say: “Hey, if you want to consult with us” and you’re giving away free money, hey I’m all on board. The problem that I have is you’re only consulting just a few agencies. And so you’re giving the agencies, that I’ve looked here, their actually doing business with MDHA. Correct?

Response: Which activity are you talking about?

48. Comment/Question: For Aging in place, or rental rehab. What you are doing for roof replacement. Habitat for Humanity already does. Habitat for Humanity does HVAC.

Response: We do not contract with or provide funds to Habitat for Humanity to administer any of these programs. MDHA has our own construction bidding process and we provide assistance directly to homeowners.

49. Comment/Question: But I’m not saying you’re doing a duplication. What I’m saying is that a person can go out there for Habitat for Humanity and go out there and get what you’re basically saying you’re doing. We could be using these funds for other purposes that’s my point.

Response: We consult with numerous entities from all different areas. Every Consolidated Plan and every Action Plan year we issue the notice that we are requesting information -- countywide through numerous emails, hundreds of contexts to try to get as much input as

possible from all stakeholders, not just the Habitat for Humanity's of the area. We have certain regulations of what we can spend money on under CDBG specifically. There may be some duplication, but we do consult the community, as to where is the best use of funds under these programs for what we're allowed to do.

Response: Habitat for Humanity of Nashville-Davidson County, to the best of my knowledge, does not have a homeowner rehab program. There were some funds allocated for that on a statewide basis. But again, Habitat for Humanity of Davidson County is not participating in those programs to the best of my knowledge. So we are not duplicating any programs they are providing.

50. Comment/Question: I can tell you in under their Aging in Place program you need to check on that. Because I do believe they are doing that. There's millions of dollars of being set aside...

Response: Thank you for your comment.

Additional Response – Post Hearing: As a follow-up, Habitat for Humanity of Nashville-Davidson County confirmed via email that they were awarded \$550,000 from Habitat for Humanity of Tennessee to complete aging-in-place/critical home repairs for 50 seniors (age 60+) who own their home and whose income is below 60% of AML. They are in year one of the three-year project.

51. Comment/Question: You're welcome

52. Comment/Question: I work for a lot of nonprofits and a lot of waiting list management. And I just want to have for the record that, if there are people in need I believe there's not duplication of effort. I think we need more people doing it not fewer.

Response: Thank you for your comment

53. Comment/Question: Could you clarify one thing on the infrastructure improvements. It wasn't really clear you have this eligibility, you have: sidewalks, parks, and other things. I think when you put together a plan you should say this is what we want to spend the money for. That's just too broad of a category to say well we want to spend 'x' amount of dollars for public infrastructure. Because that's just, you should have a project list at this point in time.

Response: We have to be very careful sometimes because sometimes if we put too detailed specifics in the Action Plan, we are held to them and we don't have any flexibility in case a particular project does not pan out for various reasons and we need to use the funds on another eligible project. We do have a couple of projects that we anticipate using these funds for including the Jefferson Street Pocket Park and possibly some infrastructure programs in the Napier Sudekum area.

54. Comment/Question: See that's part of my problem, is that we're here to comment on proposed plan. So if I wanted to comment on the Jefferson Street Pocket Park I could comment on that. If I wanted to comment on a park in Napier Sudekum I could comment on that. I can't comment on something I don't know. So when you put forward a proposed plan. It has to be at least a definitive enough that I can have the opportunity to comment on it. Now in the Napier Sudekum CNI, which you did, it said that you wanted to work on a park there. But you didn't get the CNI planning grant money the \$30 million because it's in red right now. So you can't do that. But the plan that was put forward was to put a park there.

Response: That was one on many things that was intended if we received the CNI funds.

55. Comment/Question: I know but I'm just saying for infrastructure. I'm just pointing...

Response: That was one on many infrastructure things. We also have lighting, sidewalks. And that's why we put potential sidewalks, parks. And we list the different types of projects that would probably be included. We just haven't got specific, for exactly, where they will be yet. But thank you for your comment. We will note your concern.

56. Comment/Question: The problem for me is that I can't comment on something, if I don't, if it's not specific enough. So I think would be helpful the next time around, is to have a more definitive document so people can go out. Because you should know in your own planning process what you want to allocate the money for. Because you have numbers that are there. So it seems to me you know what you want to use the money for. It's just, it looks like a transparency issue that I don't know and I can't comment on.

Response: Funding for infrastructure projects are actually allocated by Metro Council via the Resolution process once we determine which projects are going to be funded. So there is an opportunity to comment on those projects through the Council resolution process. In the Action Plan, we allocate "x" amount of dollars to go towards CDBG eligible activities in CDBG eligible areas. Once we determine what activities are viable via consultation with various Metro Departments, we will finalize the scope of the work and the cost of the activities, we will go back to Metro Council and they will actually allocate funds for a specific project.

Additional Response – Post Hearing: There two specific infrastructure projects that we plan to undertake in the Neighborhood Revitalization Strategy Area (NRSA) at Napier Sudekum that are outlined on page AP-50 of the Action Plan.

57. Comment/Question: But they're two different processes. I certainly understand the capital spending plan.

Response: That's fine, but this is Metro's money...

58. Comment/Question: This not Metro's money, this federal money.

Response: This is Metro's federal money.

59. Comment/Question: This is the entitlement money which comes from the Federal Government, it's not Metro's money.

Response: Right, which comes to Nashville-Davidson County.

60. Comment/Question: That's right. But it's entitlement money, but its Federal money. It's not Metro's money.

Response: I didn't say it was. It's Federal money that is allocated to Metro Nashville Davidson County to do eligible projects.

61. Comment/Question: I thought you said it was metro money.

Response: I did not intend to say that.

62. Comment/Question: I guess I fully understand the capital spending plan and I know how capital projects are funded in this town. When they have the capital spending plan I can review a project list. I can see exactly where that money's going. It says project list, it has a project code number. And it tells me how much is being spent on that. I do not know this. So I can comment on that, on the capital spending plan I can comment. On this I cannot comment because I don't know where the allocation is going. That's the issue.

Response: Once projects are identified, they allocate them through Metro, through the capital spending plan.

63. Comment/Question: This is my only opportunity to. You're getting entitlement money from the Federal government. I am entitled to know where you are going to allocate the money. That's my point. Now if you said, "okay before we spend any of that money we are going to have another public hearing." I would say, "great" but you're not going to have another public hearing. Once you submit this plan to HUD we're done. Okay? So that's what's really important. HUD doesn't know, if you're submitting this plan, HUD doesn't know where you're going to allocate that money either. Now is an entitlement community, yes you can spend that money, but the reason that I'm here is to review the documentation in your allocation. And it's incomplete. I understand eligible activities as well as anybody in this room.

Response: Thank you for your comments

64. Comment/Question: I'm not finished with all due respect. I'm entitled to know what your project list is. I am not here just to go out and say we're going to spend "x" amount of dollars on infrastructure projects. That's not acceptable to me. I need to come here and say, "okay this is where we're allocating the money, and this is where the project is going." If you came out here and said, "we are doing a pocket park at Jefferson Street with this money or we are using it for the Napier Sudekum Project." Then I can comment on that. I can't comment on something that just says infrastructure. Thank you.

65. Comment/Question: I would just like to understand, if you could clarify, why when we have stuff regarding our Community Development going. That we go through the Knoxville office rather than the Nashville Field Office I don't understand that. And why don't we have...

Response: That's not our call.

66. Comment/Question: Okay well I guess, we need to have the Nashville Field Office more involved in what is happening here.

Response: Unfortunately I don't think we're under their jurisdiction, and again that's not something that we set. I think that's something that HUD sets and I don't know if there's a way to change it. I understand your concern and I see where you're going as far as location wise making sense; but we have no control over that.

67. Comment/Question: Well we have. We have SNAPs okay. Special Needs Assistance. And we have Community Development Planning. The way the federal government is set up they're two different agencies there are two different divisions and yet, our issues that come together here are intertwined. It makes it hard for people to go out and say well. "Oh you need to go here or you need

to go there.” We are doing a tremendous amount of business with SNAPs. Everything we file, okay, we file with various things. HOPWA and everything. And we go, okay we’re special needs over here. But what we’re doing here is community planning and development. You see my point? Is that we’re discussing issues that are relevant to two different departments. And it’s really difficult because when somebody says, “Oh, we’re going to submit this application, we’re going to do eSNAPs.” And we’re going to do our thing here is we’re going through, what was that? IDIS? So, what is that? Disbursements Information System? What is that?

Response: Integrated Data Information System

68. Comment/Question: Okay how long have we been using that?

Response: Since, the early 90s.

69. Comment/Question: So that shows all disbursements?

Response: It has our activity information, and yes, our drawdowns, our beneficiary data and our results yes.

70. Comment/Question: Can I access that?

Response: No.

71. Comment/Question: Who has? Here’s my point. For somebody from the performance evaluation committee to go out and see what drawdowns are, I guess they have two options one....

Response: That information is included in the information that we provide in our CAPER. When we talk about our results in our CAPER we have pulled the information and data from IDIS for the year. To report on: drawdowns, expenditures, beneficiaries. So that’s how you have access to the IDIS information, this information is what we put in the CAPER report.

Response: I think what you’re referring to is a CoC Performance Evaluation Committee and MDHA does not have access to the CoC grant expenditures and the CoC grantees receive the CoC funds through SNAPs and they draw those funds directly from HUD and we don’t have information on those disbursements as their grant agreement is with HUD and they draw those funds directly from HUD.

Additional Response – Post Hearing: MDHA received a new report on May 6, 2019 from the SNAPs entitled the “CoC Spending Report – TN 504” that can be made available via a request for the same from MDHA’s Communications Director.

72. Comment/Question: That is correct. I guess what I’m doing is that, how can the performance evaluation committee, when they go out and somebody has not drawn down their funds. How does the performance evaluation committee understand that there has not been disbursement for maybe an extended period of time and they might not be in compliance with their agreement? And how can you do reallocation of funds then?

Response: MDHA as a collaborative applicant, go out and monitor the CoC funded agencies and make the performance evaluation committee aware if there are problems with expenditure of funds and projects, via the monitoring process.

73. Comment/Question: But, you just said you don't have access to those grant disbursements.

Response: We don't.

74. Comment/Question: So how can you monitor it?

Response: When we go out and monitor them we do on site monitoring which would review their records.

75. Comment/Question: So you can go out and access to business records? On the site visit?

Response: Yes. Through the monitoring process, yes.

76. Comment/Question: So that's in their agreement with HUD that you have the capability to monitor their financial records.

Response: I don't think it specifically spelled out in the agreement with HUD because the agreements with HUD are very vague; but we do go out and try to monitor them to make sure that they're spending funds as it is one of our responsibilities as Collaborative Applicant.

77. Comment/Question: Well how when, we had Aphasis house when they weren't really technically...

Response: We were aware that was a problem project and we've been trying to work with them to resolve issues but again their grant agreement was directly with HUD.

78. Comment/Question: Correct. But they were not entitled to those funds so how would we do a reallocation; because we didn't know where the drawdown money was happening?

Response: We were aware and we tried to find another agency that would agree to complete an eligible project that we could reallocate the funds to, but unfortunately we were not able to do. Unfortunately just because you monitor projects doesn't mean that sometimes you won't have a problem projects. Unfortunately, that's what happened with the Aphasis house.

79. Comment/Question: Was at going to be a voluntary reallocation or involuntary reallocation.

Response: The people they were serving were not eligible folks. So they realized when they were monitored and their client files showed that some of the folks that they were serving were not eligible under the HUD homeless definition. They were aware that they were going to have to give the funds up; and so I would say it would be voluntary. Then we tried to find agencies who are interested in taking those over and there was very little interest locally in doing that.

80. Comment/Question: We're closing out the three development block grant disaster relief, the money has already been obligated. When do you anticipate to be closing out that so it could go to audit?

Response: I am not involved directly with the disaster recovery fund, so I do not have that answer. It's something that we can look up and provide an answer in the comments after the draft. I just do not have that information right now.

Additional Response – Post Hearing: We anticipate being able to closeout out these grants sometime in 2020.

81. Comment/Question: Okay, how's the allocation on the HOPWA go? There's the Ryan White Planning Council that does some stuff I assume, that that's for basically hospital related expenses, drugs, and things of that nature. When we talk about sponsored administration? The 7 %. Are there just maybe two other entities that are doing that like Murfreesboro or Clarksville or...

Response: Typically we have three to four sponsor agencies that apply for and receive HOPWA funds. Those include Nashville Cares, Urban Housing Solutions, Meharry Medical, and Street Works has historically been an agency. The sponsors' administration is limited to administrative activities that they perform part that they can receive administrative funds for.

82. Comment/Question: But when they go out there. Off the top then they...

Response: Whatever their allocation is, they can only get 7% of what their award towards administrative expense.

83. Comment/Question: Correct. I guess I'm just trying to understand if there's all these multiple agencies, do you have some regional meetings so that everybody knows what, so Nashville knows what Murfreesboro, Clarksville and everybody else is doing?

Response: When we have the consultations for the Action Plan we invite people from the regional area. We invite Murfreesboro, Clarksville, Hendersonville, other agencies, and we invite them to participate in the process.

84. Comment/Question: Okay. One other thing I just wanted to mention we had a T.A. (technical assistance) consultant by HUD that put out an email, a year ago this month. That basically said, 'do not share this information'.

Response: I am not aware of the information you're talking about.

85. Comment/Question: I know you're not but I just want to be on the public record. That a consultant violated the public records act by asking that an email not be shared with the public. That you cannot go out and be a consultant and can be paid by the federal government and put an email at the bottom and say, "please do not share." Any sort of email that goes out needs to be in the public realm. Now this was not your thing; but I want to make sure that when consultants come here and they send an email to anybody within MDHA, and it says do not share, that you have to email them promptly and say, 'this is a public record. That the public is entitled to you cannot have us bound and say, "We are not going to share that." There's no such thing.

Response: We will look into that, and we will take note of your concern.

86. Comment/Question: That was written by T.A. Consultant employed via HUD to an MDHA employee.

Response: Okay. Thank you.

87. Comment/Question: Thank you

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

APPENDIX G
FAIR HOUSING PLAN

FAIR HOUSING GOALS & PRIORITIES

- 1. For each fair housing issue as analyzed in the Fair Housing Analysis section, prioritize the identified contributing factors. Justify the prioritization of the contributing factors that will be addressed by the goals set below in Question 2. Give the highest priority to those factors that limit or deny fair housing choice or access to opportunity, or negatively impact fair housing or civil rights compliance.**

The following is a list of contributing factors, in descending priority, for each fair housing issue analyzed. Prioritization of contributing factors is based on the degree in which the factor impacts a fair housing issue; factors having the greatest impact on a fair housing issue and addressed through a fair housing goal are listed first and those with less direct or more remote ability to remedy the respective fair housing issues listed last.

Segregation

- Location and type of affordable housing
- Loss of affordable housing
- Displacement of resident due to economic pressure
- Lack of meaningful access for individuals with LEP
- Quality of affordable housing information programs
- Lending discrimination
- Source of income discrimination
- Lack of community revitalization strategies
- Lack of public investment in specific neighborhoods, including services or amenities
- Lack of private investment in specific neighborhoods
- Land use and zoning
- Private discrimination

R/ECAPs

- Location and type of affordable housing
- Loss of affordable housing
- Displacement of resident due to economic pressure
- Lack of meaningful access for individuals with LEP
- Quality of affordable housing information programs
- Lending discrimination
- Source of income discrimination
- Lack of private investment in specific neighborhoods
- Land use and zoning
- Impediments to mobility
- Deteriorated and abandoned properties

Disparities in Access to Opportunity

- Location and type of affordable housing

- Availability, type, frequency and reliability of public transportation
- Loss of affordable housing
- Displacement of resident due to economic pressure
- Lack of opportunity due to high housing costs
- Lack of meaningful access for individuals with LEP
- Quality of affordable housing information programs
- Access to financial services
- Lending discrimination
- Source of income discrimination
- Lack of community revitalization strategies
- Lack of public investment in specific neighborhoods, including services or amenities
- Lack of private investment in specific neighborhoods
- Land use and zoning
- Private discrimination

Disproportionate Housing Needs

- Lack of affordable, accessible units in a range of unit sizes
- Loss of affordable housing
- Lack of assistance for housing accessibility modifications
- Occupancy codes and restrictions
- Lack of meaningful access for individuals with LEP

Publicly Supported Housing

- Lack of affordable, accessible units in a range of unit sizes
- Access to publicly supported housing for persons with disabilities
- Occupancy codes and restrictions
- Admissions and occupancy policies and procedures, including preferences in publicly supported housing
- Impediments to mobility
- Source of income discrimination
- Lack of meaningful access for individuals with LEP
- Quality of affordable housing information programs
- Lack of public investment in specific neighborhoods
- Lack of private investment in neighborhoods
- Community opposition
- Loss of affordable housing
- Displacement of residents due to economic pressure
- Siting selection policies, practices, and decision for publicly supported housing

Disability and Access

- Lack of affordable, accessible units in a range of unit sizes

- Access to publicly supported housing for persons with disabilities
- Loss of affordable housing
- Lack of affordable, integrated housing for individuals who need supportive services
- Lack of assistance for housing accessibility modifications
- Lack of affordable in-home or community-based supportive services
- Access to transportation for persons with disabilities
- Inaccessible public or private infrastructure
- Lack of assistance for transitioning from institutional settings to integrated housing
- [Lack of knowledge about requesting reasonable accommodation to] Land use and zoning laws

Fair Housing Enforcement and Outreach

- Community opposition
- Lack of local public fair housing enforcement
- Lending discrimination
- Private discrimination

2. For each fair housing issue with significant contributing factors identified in Question 1, set one or more goals. Using the table below, explain how each goal is designed to overcome the identified contributing factor and related fair housing issue(s). For goals designed to overcome more than one fair housing issue, explain how the goal will overcome each issue and the related contributing factors. For each goal, identify metrics and milestones for determining what fair housing results will be achieved, and indicate the timeframe for achievement.

*NOTE: When MDHA is listed as a Responsible Program Participant, it will be noted whether it is a public housing authority (PHA) responsibility or a Consolidated Plan (CP) responsibility, since MDHA is the designated Consolidated Plan administrator. Goals will be incorporated in the next Five Year Consolidated Plan and included in the Strategic Plan for Housing and Community Development. MDHA's PHA specific goals will be incorporated in its next Five Year PHA Plan.

GOAL	CONTRIBUTING FACTORS	FAIR HOUSING ISSUES	METRICS, MILESTONES, & TIMEFRAME FOR ACHIEVEMENT	RESPONSIBLE PROGRAM PARTICIPANT
1. Increase the number of affordable housing units accessible to all protected classes.	<ul style="list-style-type: none"> • Lack of affordable, accessible housing in a range of unit sizes • Location and type of affordable housing • Lack of affordable, integrated housing for individuals who need supportive services • Loss of affordable housing • Availability, type, frequency, and reliability of public transportation • Access to transportation for persons with disabilities 	<ul style="list-style-type: none"> • Segregation • R/ECAPs • Disability and Access • Disparities in Access to Opportunity • Disproportionate Housing Needs • Publicly Supported Housing 	<p>1(a). Promote property tax exemptions available to nonprofits pursuant to T.C.A. 67-5-207 for properties financed with certain HUD funding for permanent housing for low income persons with disabilities or low income elderly persons. (< 1 year)</p> <p>1(b). Utilize MDHA & Metro property to create a range of affordable, accessible housing options. (2-5 years)</p> <p>1(c). Provide public incentives to create new housing in areas of opportunity and/or to create permanent supportive housing. (1-5 years)</p> <p>1(d). Incentivize creation of affordable housing on transit</p>	<p>1(a). MDHA (CP)</p> <p>1(b). MDHA (CP & PHA), Metro</p> <p>1(c). MDHA (CP) & Metro</p> <p>1(d). MDHA (CP & PHA), Metro</p> <p>1(e). Metro</p>

			corridors. (2-5 years) 1(e). Continue to fund the Barnes Fund. (1-5 years)	
<p>Discussion: The analysis revealed a severe lack of affordable housing in a range of unit sizes, particularly for families and persons with disabilities, and in areas that are integrated or high opportunity. MDHA in its Consolidated Plan role and as the PHA for Nashville will work closely with the Metro Government to deploy and leverage resources through a variety of mechanisms to create new affordable housing that is accessible to all protected classes: 1(a) – MDHA will publicize this program when making applicable HUD funding available and work with developers constructing eligible projects on ensuring appropriate documentation for the State to create more affordable, accessible housing in a range of unit sizes to address Disproportionate Housing Needs and Disability and Access. 1(b) – MDHA and Metro will develop or partner with developers on creating new affordable, accessible housing in a range of unit sizes to address Disproportionate Housing Needs especially encountered by families and to address Disability and Access and Publicly Supported Housing. 1(c) – When making public funds (i.e., HOME, Barnes Fund) available for new housing construction, priority will be given for projects in high opportunity areas to address Segregation, R/ECAPs, and Disparities in Access to Opportunity. A portion of HOME funds will be set aside to create permanent supportive housing to address Disability and Access and Disproportionate Housing Needs. 1(d) – Also to address Segregation, R/ECAPs, Disparities in Access to Opportunity, and Disabilities and Access, MDHA and Metro will create and/or expand funding mechanisms to incentivize affordable housing along designated transit corridors. 1(e) – Continued commitment of Metro to contribute at least \$10 million each year for the Barnes Fund will help address Segregation, R/ECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs by facilitating housing construction in areas of opportunity and in a range of unit sizes.</p>				
<p>2. Preserve existing affordable housing units, especially for persons with Limited English Proficiency (LEP) and persons with disabilities (and the elderly).</p>	<ul style="list-style-type: none"> • Displacement of residents due to economic pressure • Lack of affordable, accessible housing in a range of unit sizes • Lack of assistance for housing accessibility modifications • Loss of affordable housing • Occupancy 	<ul style="list-style-type: none"> • Segregation • R/ECAPs • Disability and Access • Disparities in Access to Opportunity • Disproportionate Housing Needs 	<p>2(a). Dedicate public funding and/or make other funding available for making accessibility improvements for low-income persons with disabilities. (1-5 years)</p> <p>2(b). Continue to promote tax freeze program. (1-5 years)</p> <p>2(c). Coordinate with Metro Codes on providing</p>	<p>2(a). MDHA (CP) & Metro</p> <p>2(b). Metro</p> <p>2(c). Metro & MDHA (CP)</p> <p>2(d). Metro, MDHA (CP & PHA)</p>

	codes and restrictions <ul style="list-style-type: none"> • Deteriorated and abandoned properties 		assistance to homes in need of repair. (1-5 years) 2(d). Attempt to intervene when potential loss of affordable housing is identified. (1-5 years)	
<p>Discussion: Following closely on the need to create more affordable housing accessible to all protected classes is the need to help vulnerable populations (i.e., persons with disabilities, LEP, and living in rapidly gentrifying areas) retain housing they have. 2(a) – Allocating funding in the Consolidated Plan (such as CDBG and HOME) and/or through other sources addresses Disability and Access and Disproportionate Housing Needs by helping persons with disabilities make necessary improvements so they can remain in their homes. 2(b) – With Nashville’s trend toward increased property values, continuing and expanding outreach efforts about Metro’s tax freeze program will help avert displacement of residents due to economic pressure and the loss of affordable housing that could lead to increased Segregation, R/ECAPs, and Disparities in Access to Opportunity. 2(c) – MDHA will work with Metro Codes and other Metro agencies to develop a protocol to alert MDHA (or other agencies) when homes in need of repair are identified, and MDHA will target CDBG for repairs. As with 2(b) this help avert displacement of residents due to economic pressure and the loss of affordable housing that could lead to increased Segregation, R/ECAPs, and Disparities in Access to Opportunity and also addresses Disproportionate Housing Needs. 2(d) – As affordability restrictions expire for large, multi-family apartment buildings, persons with disabilities and persons with LEP have been particularly affected by the loss of affordable housing and resulting displacement. Metro and MDHA will explore legal and financial options to be better positioned to intervene by preserving the housing or minimizing the impact that could lead to increased Segregation, R/ECAPs, Disparities in Access to Opportunity and Disproportionate Housing Needs.</p>				
3. Increase access to affordable housing opportunities, especially for persons with Limited English Proficiency (LEP) and persons with disabilities.	<ul style="list-style-type: none"> • Access to publicly supported housing for persons with disabilities • Admissions and occupancy policies and procedures, including preferences in publicly supported housing • Community opposition 	<ul style="list-style-type: none"> • Segregation • R/ECAPs • Disability and Access • Disparities in Access to Opportunity • Disproportionate Housing Needs • Publicly Supported Housing 	3(a). Adopt a model to quickly connect persons who are chronically homeless to housing. (1 year) 3(b). Engage and incentivize landlords with housing in opportunity areas to accept Vouchers. (1-5 years)	3(a). MDHA (CP & PHA), Metro, Continuum of Care 3(b). MDHA (PHA & CP), Metro 3(c). MDHA (CP & PHA), Metro 3(d). MDHA (CP & PHA), Metro 3(e). Metro, MDHA (CP)

	<ul style="list-style-type: none"> • Impediments to mobility • Lack of affordable housing in a range of unit sizes • Lack of affordable, integrated housing for individuals who need supportive services • Lack of meaningful access for individuals with LEP • Location and type of affordable housing • Quality of affordable housing information programs 		<p>3(c). Expand language access to leases, loan documents, etc. (1-5 years)</p> <p>3(d). Require that all publicly-funded affordable housing projects meet universal design or visitability standards. (1-5 years)</p> <p>3(e). Develop creative homeownership (purchase). Options. (1-5 years)</p> <p>3(f). Review and make MDHA's policy for considering criminal history available to the public. (1-2 years)</p> <p>3(g). Create a countywide housing navigation system. (1-5 years)</p>	<p>3(f). MDHA (PHA)</p> <p>3(g). MDHA (CP), Metro</p>
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Discussion: Goals 1 & 2 are intended to address the built environment by creating and preserving housing units, while Goals 3 & 4 are intended to assist persons with protected characteristics overcome barriers to securing and/or retaining this housing. 3(a) – MDHA and Metro will work with the Continuum of Care (CoC) to educate homeless service providers and landlords about Housing First and to align programs and funding sources that will address Disability and Access, Disproportionate Housing Needs, and Publicly Supported Housing. 3(b) – The analysis shows an overwhelming concentration of Vouchers in Segregated areas, R/ECAPs, and areas with Disparities in Access to Opportunity; providing incentives to landlords with rental housing in other areas of the county will decrease Vouchers concentrated in these areas. 3(c) – Metro and MDHA will partner with housing industry associations to facilitate (train and provide resources) the expansion of leases and other real estate related documents to persons with LEP. 3(d) MDHA and Metro will include universal design and visitability requirements in all funding awards to developers

and in all government constructed housing to address Disability and Access and Disproportionate Housing Needs. 3(e) – During the development of the AFH, community members expressed limitations on their ability to purchase a home due to religious beliefs. Metro and MDHA will work with lenders to make home purchase financing available in a means accessible by persons who cannot typically cannot access conventional methods which will broaden housing options outside of Segregated areas, R/ECAPs, and area with Disparities in Access to Opportunity. 3(f) – MDHA will review its policy on considering criminal history for admission to ensure it meets HUD standards and will post it on MDHA's website so that the public knows what is required to access Publicly Supported Housing. 3(g) MDHA and Metro will lead on aligning housing providers and programs to educate residents on housing options in the county. A countywide housing navigation system will help locate housing outside of Segregated areas, R/ECAPs, and areas with Disparities in Access to Opportunity.

4. Create/expand programs to help tenants and homeowners retain housing.	<ul style="list-style-type: none"> • Access to publicly supported housing for persons with disabilities • Lack of affordable in-home or community-based supportive services • Lack of affordable, integrated housing for individuals who need supportive services • Location and type of affordable housing 	Disability and Access Disproportionate Housing Needs Publicly Supported Housing	4(a). Make process for requesting reasonable accommodation in MDHA-owned housing publicly available. (<1 year) 4(b). Align resources and improve strategies for homeless prevention. (1-5 years) 4(c). Establish interventions to evictions for persons with mental impairments. (1-3 years)	4(a). MDHA (PHA) 4(b). MDHA (PHA & CP), Metro, Continuum of Care 4(c). MDHA (PHA & CP), Metro, Continuum of Care
Discussion: These programs are intended to help persons with disabilities overcome barriers to retaining housing outside of the loss of a physical unit as discussed in Goal #2. 4(a) – MDHA will make its process for requesting reasonable accommodation in its housing easily accessible by posting on its website and making copies available in property offices. 4(b) – MDHA in coordination with Metro and the CoC will utilize data to prioritize funding decisions that will prevent at-risk persons with chronic illness from becoming homeless. 4(c) – MDHA and Metro will work with mental health providers, case managers and landlords to develop a protocol to intervene when an individual in housing who is experiencing a mental health crisis to minimize the risk of an eviction.				
5. Create/expand programs [targeted to persons in Segregated areas and R/ECAPs] to increase self-sufficiency.	<ul style="list-style-type: none"> • Access to financial services • Lending discrimination • Source of income discrimination • Lack of opportunity due to high housing costs 	<ul style="list-style-type: none"> • Segregation • R/ECAPs • Disparities in Access to Opportunity 	5(a). Expand financial counseling programs into R/ECAPs, particularly to youth (1-5 years) 5(b). Expand digital inclusion opportunities at MDHA properties. (2-5 years)	5(a). Metro 5(b). MDHA (PHA)
Discussion: Goals 1-4 focused on creating and retaining housing outside of Segregated areas, R/ECAPs, and area with Disparities in Access to Opportunity and increasing access to/preserving				

<p>housing occupied by persons with disabilities and LEP. Goals 5-7 focus on bringing opportunities and investment to underserved areas, which are Segregated, R/ECAPs, and have significant Disparities in Opportunity. 5(a) – By securing additional funding, Metro can expand programs Financial Empowerment Center to target persons in R/ECAPs, particularly youth. 5(b) – MDHA will continue its participation in the ConnectHome initiative and bring technology and training programs to all properties.</p>				
<p>6. Increase public investment in underserved neighborhoods</p>	<ul style="list-style-type: none"> • Lack of community revitalization strategies • Lack of public investment in specific neighborhoods , including services or amenities 	<ul style="list-style-type: none"> • Segregation • R/ECAPs • Disparities in Access to Opportunity • Disproportionate Housing Needs • Publicly Supported Housing 	<p>6(a). Leverage resources to redevelop public housing properties in R/ECAPs to create mixed-income, mixed-use communities. (1-5+ years)</p> <p>6(b). Continue to target public funds for neighborhood programs and infrastructure projects in R/ECAPs. (1-5 years)</p>	<p>6(a). MDHA (PHA & CP), Metro</p> <p>6(b). MDHA (CP), Metro</p>
<p>Discussion: Through initiatives such as MDHA’s RAD conversion and planned recapitalization of its older properties, the recently designated Promise Zone, and the CDBG Place-Based Strategy, Metro and MDHA have demonstrated a commitment to increase public investment in the county’s most underserved areas. These areas are highly Segregated, R/ECAPs, and have significant Disparities in Access to Opportunity. 6(a) – MDHA will continue to implement its recapitalization (“Envision”) plans to demolish and redevelop its traditional public housing sites, keeping its commitment to 1-for-1 replacement of public housing while creating new workforce and market rate housing. MDHA’s first Envision effort is underway at the James Cayce apartments with its first mixed income building soon to be under construction. 6(b) In the 2013-2018 Consolidated Plan, MDHA introduced a Place-Based Strategy for Community Development, targeting CDBG funds in underserved areas. As MDHA leads the development of the next 5 Year Consolidated Plan, it will continue to allocate funding to capital improvements and other projects in R/ECAPs, subject to Citizen Participation.</p>				
<p>7. Incentivize private investment in underserved neighborhoods</p>	<ul style="list-style-type: none"> • Lack of community revitalization strategies • Lack of private investment in specific neighborhoods • Land use and zoning 	<ul style="list-style-type: none"> • Segregation • R/ECAPs • Disparities in Access to Opportunity • Disproportionate Housing Needs 	<p>Offer incentives to attract private investment in R/ECAPs and areas with concentrations of publicly supported housing. (2-5 years)</p>	<p>Metro, MDHA (PHA & CP)</p>

<p>Discussion: To truly bring opportunity to underserved areas, public investment needs to leverage private investment. Tax increment financing (TIF) is one tool to stimulate private investment in established Redevelopment Districts and to-be-created Transit Oriented Redevelopment Districts. By prioritizing planning and development efforts in these distressed areas, private developers can access TIF and other incentives to facilitate development projects.</p>				
<p>8. Expand fair housing outreach, education, and enforcement activities.</p>	<ul style="list-style-type: none"> • Community opposition • Lack of local public fair housing enforcement • Lending discrimination • Private discrimination 	<ul style="list-style-type: none"> • Segregation • R/ECAPs • Disability and Access • Disparities in Access to Opportunity • Disproportionate Housing Needs 	<p>8(a). Coordinate with neighborhood groups and community leaders to identify fair housing issues. (<1 year)</p> <p>8(b). Continue to use CDBG funds to support fair housing outreach, education, and enforcement activities. (1-5 years)</p> <p>8(c). Consider creating a local mechanism to enforce Fair Housing complaints. (1-2 years)</p>	<p>8(a). Metro, MDHA (CP)</p> <p>8(b). MDHA (CP)</p> <p>8(c). Metro</p>
<p>Discussion: Metro and MDHA will strengthen commitments to affirmatively further fair housing by expanding outreach, education, and enforcement activities so that residents are fully informed of their rights, the housing industry understands its responsibilities, and public agencies can address issues. 8(a) – MDHA and Metro will launch a joint public awareness campaign in partnership with local groups and leaders. 8(b) – MDHA has partnered with the local FHIP agency to support its fair housing activities and will propose to continue this partnership in the new 5 Year Consolidated Plan. 8(c) – Currently, Metro does not have a mechanism to enforce local fair housing violations. It will review its authority and capacity to develop an enforcement mechanism.</p>				

METROPOLITAN NASHVILLE-DAVIDSON COUNTY, TENNESSEE

EXHIBITS

**SUBSTANTIAL AMENDMENT 1
TO THE
2018-2023 CONSOLIDATED PLAN
FOR
HOUSING AND COMMUNITY DEVELOPMENT
AND
2019-2020 ANNUAL UPDATE
TO THE
2018-2023 CONSOLIDATED PLAN
FOR
HOUSING AND COMMUNITY DEVELOPMENT
PROGRAM YEAR TWO**

For the period June 1, 2019 – May 31, 2020

Prepared by:

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



Updated May 28, 2019

Substantial Amendment 1 to the 2018-2023 Consolidated Plan

For

Housing and Community Development

And

2019-2020 Annual Update to the 2018-2023 Consolidated Plan

(2019 Action Plan) Program Year Two

EXHIBITS

Exhibit 1 – CPD Notice 19-01, HUD Guidance on Submitting Consolidated Plans and Annual Updates for Fiscal Year (FY) 2019 and HUD Approval to Extend Deadline to Submit Consolidated Plan

Exhibit 2 – Determining a Census Tract Number

Exhibit 3 – Notice of 2019 Allocations

EXHIBIT 1

CPD NOTICE 19-01

**GUIDANCE ON SUBMITTING CONSOLIDATED PLANS AND ANNUAL ACTION
PLANS FOR FISCAL YEAR 2019**

And

HUD Approval to Extend Deadline to Submit Consolidated Plan



OFFICE OF COMMUNITY PLANNING
AND DEVELOPMENT

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

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

NOTICE: CPD-19-01

Issued: February 13, 2019
Expires: September 30, 2019

Cross Reference: 24 CFR Part 91

Subject: Guidance on Submitting Consolidated Plans and Annual Action Plans
for Fiscal Year (FY) 2019

Purpose:

The purpose of this Notice is to instruct all Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), Housing Trust Fund (HTF), Emergency Solutions Grants (ESG) and Housing Opportunities for Persons With AIDS (HOPWA) grantees on the timing of submission of FY 2019 Consolidated Plans and Action Plans. Grantees should not submit their Plans until after Congress passes HUD's FY 2019 appropriations, and the actual grant amounts have been determined. This Notice provides instructions to grantees/participating jurisdictions under each of these programs regarding costs incurred prior to execution of a grant agreement. This Notice further informs Entitlement CDBG grantees and HOME participating jurisdictions of waivers being made available to certain grantees/participating jurisdictions to assist in the implementation of the pre-award costs instructions. These procedures apply equally to grantees' 3- to 5-year Consolidated Plans as well as to annual Action Plans (either as a stand-alone document or as a component of the overall Consolidated Plan submission).

Notes regarding applicability:

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

Background:

Pursuant to 24 CFR 91.15(a)(1), each jurisdiction should submit its Consolidated Plan to HUD at least 45 days before the start of its program year. The earliest date on which HUD will accept a Consolidated Plan or Action Plan submission is November 15, 2018; and the latest

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submission deadline is August 16, 2019. However, in most years, HUD does not receive its annual funding appropriation until several months into the federal fiscal year (rarely earlier than December, and sometimes as late as April). Once a fiscal year's appropriation is enacted, HUD needs time to compute grantees' allocation amounts for the programs covered by the Consolidated Plan.

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

This practice resulted in significant additional work for both HUD and grantees. After the actual allocation amounts were announced, a grantee had to submit a revised, re-signed SF-424 form listing the actual allocation amounts for each of its grants. In many cases, the grantee had to make additional changes to amend its Plan to reflect its actual allocation amounts. This may have constituted a substantial amendment under 24 CFR 91.505, which is subject to the grantee's citizen participation plan process. For FY 2019, HUD will not execute a grant agreement with a grantee until HUD has received a Plan (or an amended Plan) which incorporates the actual allocation amounts a grantee is to receive for FY 2019.

Revised Procedures for Submission of FY 2019 Consolidated Plans and Action Plans by Grantees with Early Program Year Start Dates:

HUD is issuing the following revised procedures to govern the submission and review of Consolidated Plans and Action Plans for FY 2019 funding prior to computation of FY 2019 allocation amounts. These procedures will apply to any grantee whose normal Consolidated Plan/Action Plan submission deadline (45 days before the start of the program year) falls either before, or less than 60 days after, the date HUD announces FY 2019 allocation amounts for CDBG, ESG, HOME and HOPWA funding. (See Section II. for a discussion of the timing of Housing Trust Fund allocations.)

Congress has not completed the appropriations process for HUD's FY2019 appropriation. At this time, HUD cannot predict when its FY 2019 appropriations bill will be enacted and when it will be able to announce FY 2019 allocation amounts. Thus, HUD cannot say how many grantees – or which program year start dates – will be subject to these revised procedures. Similarly, HUD cannot provide estimated FY 2019 allocation amounts for grantees to use for planning purposes in developing annual Action Plans.

Note: These procedures will not apply to grantees whose normal Consolidated Plan/Action Plan submission deadline is more than 60 days after HUD announcement of FY 2019 allocation amounts; those grantees should have sufficient time to revise their Plans to match actual allocation amounts prior to the due date for their Plan.

I. Revised Submission Dates for FY 2019 Consolidated Plans/Action Plans for CDBG, ESG, HOME, HOPWA

Grantees are advised not to submit their Consolidated Plan/Action Plan until after the FY 2019 allocations have been announced. Grantees due to submit a new 3- to 5-year Consolidated Plan in FY 2019 should refrain from submitting the overall Consolidated Plan as well as the FY 2019 Action Plan contained within the overall document. HUD cannot complete its review of the overall Consolidated Plan components independent of the current year's Action Plan component. Once HUD informs grantees of their FY 2019 funding allocation amounts, each grantee should, prior to submission, ensure that the actual FY 2019 allocation amounts are reflected in the form SF-424, in the description of resources and objectives, and in the description of activities to be undertaken (or, for states, the method of distribution). It may be necessary for a grantee to revise its Action Plan before submission to HUD.

An affected grantee may delay submission of its Consolidated Plan or Action Plan to HUD until 60 days after the date allocations are announced, or until August 16, 2019 (whichever comes first). This delay will give a grantee time to revise its Action Plan to incorporate actual allocation amounts, and to conduct any additional citizen participation, if necessary.

For example, if HUD were to announce the FY 2019 allocation amounts to grantees on April 26, 2019:

- For grantees with January 1 – June 1 program year start dates, their normal plan submission date would have been before the date that HUD announced allocation amounts. These grantees would be able to postpone submission of their Consolidated Plan/Action Plan until June 25, 2019.
- For grantees with July 1 and August 1 program year start dates, their normal Plan submission date would be less than 60 days after HUD's announcement of allocation amounts. These grantees would also be able to postpone submission of their Consolidated Plan/Action Plan until June 25, 2019.
- Grantees with September 1 and October 1 program year start dates would have more than 60 days between the date of announcement of allocations and the normal submission deadline for their Consolidated Plan/Action Plan. These grantees would be expected to submit their Plan on time.

However, in no case may a Consolidated Plan/Action Plan be submitted to HUD later than August 16, 2019. Failure to submit an Action Plan for FY 2019 by August 16, 2019, will result in the automatic loss of FY 2019 CDBG funds to the grantee. This requirement is established by statute, and HUD cannot waive the August 16 submission deadline. Funding under other CPD formula programs are not subject to this deadline but, since virtually all CPD formula grantees receive CDBG funding, the CDBG submission requirement effectively establishes the deadline for submission of Action Plans.

The regulations, at 24 CFR 91.15(a)(1), state that "...each jurisdiction should submit its Consolidated Plan at least 45 days before the start of its program year." HUD has determined that it is not necessary to waive this provision in order to implement the procedures in this Notice for FY 2019 Action Plans. This provision does not prohibit a grantee from submitting a Plan in the eCon Planning Suite after that time. It is not necessary for an affected grantee to request an exception to its normal Action Plan submission date under 24 CFR 91.15(a)(1), nor is it necessary for a field office to grant an exception to the Action Plan submission deadlines, under 24 CFR 91.20, in order to implement the procedures in this Notice.

II. Submission Process for the Housing Trust Fund (HTF) Program

HTF is an affordable housing production program to increase and preserve the supply of decent, safe, and sanitary affordable housing for extremely low-income and very low-income families. See 24 CFR part 93. HTF is a formula grant program for states.

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

The timing of the HTF allocations is different from other CPD formula programs (CDBG, HOME, HOPWA, and ESG) because the source of funding is the mandatory assessments on Fannie Mae and Freddie Mac rather than Federal appropriations. The earliest HUD expects to publish the HTF allocations is April 2019. If HTF allocations are not published before a state submits its Consolidated Plan/Action Plan, a state may submit its Consolidated Plan/Action Plan for the other CPD formula programs, then submit its HTF allocation plan as a substantial amendment to its annual Action Plan, after the HTF allocations are published.

III. HUD Review of Action Plans

HUD will review a Consolidated Plan/Action Plan in accordance with 24 CFR 91.500(b). The 45-day review period will begin whenever the eCon Planning Suite submission or original executed SF-424, certifications and applicable assurances (SF 424B and SF 424D, as applicable) are received by the field office, whichever is later. HUD will disapprove as substantially incomplete any Consolidated Plan or Action Plan covering FY 2019 funding that does not reflect actual CDBG, HOME, ESG and HOPWA allocation amounts on the form SF-424(s), in the description of resources and objectives, and in the description of activities to be undertaken (or, for states, the method of distribution). The HTF allocation must be included if the HTF allocations are published before the state submits its Consolidated Plan or Action Plan. (See Section II.) A grantee whose Action Plan is disapproved for this reason is advised to not resubmit a revised Plan until HUD has announced the actual FY 2019 allocation amounts, and until the grantee has incorporated the actual allocation amounts into its Plan.

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

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

24 CFR 91.500(d) states that “(t)he jurisdiction may revise or resubmit a Plan within 45 days after the first notification of disapproval.” HUD has determined that it is not necessary to waive this provision in order to implement the procedures in this Notice for FY 2019 Consolidated Plans/Action Plans. This provision does not prohibit a grantee from re-submitting a Plan after that time period.

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

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

A grantee has several options regarding fulfilling its citizen participation obligations while waiting for HUD to announce FY 2019 allocation amounts:

- a. A grantee may conduct citizen participation on its draft Plan (with estimated funding amounts) according to its normal timetable and citizen participation procedures. (Grantees

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

Examples of contingency provisions include:

- A Plan could state that all proposed activities’ budgets will be proportionally increased or decreased from the estimated funding levels to match actual allocation amounts.
- A grantee could express its budget in terms of percentages of the allocation to be budgeted to each planned activity, along with the grantee’s current estimate of how many dollars that equates to for each activity. [For example, regardless of what the final allocation amounts are, the United Interfaith Street Outreach Program will receive 22% (currently estimated to be approximately \$38,000) of the grantee’s total ESG allocation, and the Tenant-Based Rental Assistance activity will receive 10% (currently estimated to be about \$68,750) of the HOME allocation.]
- A Plan could state that any increase or decrease in funding to match actual allocation amounts will be applied to one or more specific activities (e.g., any increase or decrease relative to the grantee’s estimated allocation amount will be applied to the single-family housing rehabilitation grant program).
- A Plan could list its proposed activities in priority order and indicate that the East Side Sidewalk Replacement activity listed in the plan is a “backup” activity that will be funded only if sufficient CDBG funding exists; or conversely, if the grantee’s actual allocation is less than estimated, the East Side Sidewalk Replacement activity will not be funded in FY 2019.
- A Plan could state that, should the actual allocation amount exceed the grantee’s estimate, the grantee will increase the Uptown Sewer Separation activity budget and will extend the service area block-by-block along the 600-900 blocks of Cherry Street, based on the amount of additional funding available.

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

- b. Alternatively, a grantee may prepare a proposed Action Plan according to its normal timetable, but wait until actual allocation amounts are known before undertaking citizen participation actions. Once allocation amounts are announced by HUD, the grantee

will need to update relevant sections of its Plan (such as the listings of resources and objectives, and the description of activities or the state's method of distribution) to reflect actual allocation amounts before conducting citizen participation. All grantees intending to incur pre-award costs under the programs covered by this Notice should be aware that this option will not be available to them, as citizen participation requirements must be met before pre-award costs are incurred. (See Section V. below.)

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

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

V. Pre-Award Costs

A. General Provisions Applicable to All Consolidated Plan Programs

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

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

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

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

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

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

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

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

Note: Pre-award costs are incurred at the grantee's own risk because reimbursement is contingent upon the availability of appropriated funds for FY 2019 in addition to the applicable provisions listed in this section.

B. Additional Provisions: Entitlement CDBG Program

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

1. 24 CFR 570.200(h) defines the effective date of a grantee's agreement as the grantee's program year start date or the date that the Consolidated Plan/Action Plan is received by HUD (whichever is later). Under the provisions of this Notice, a grantee's Action Plan may not be submitted to (and thus received by) HUD until several months after the grantee's program year start date. This may negatively affect grantees' ability to incur pre-award costs.
2. Therefore, HUD has issued a waiver of 24 CFR 570.200(h) to the extent necessary to implement the following requirement: the effective date of a grantee's FY 2019 grant agreement will be considered to be the earlier of the grantee's program year start date or the date that the Consolidated Plan/Action Plan (with actual allocation amounts) is received by HUD. Attachment A contains the HUD memorandum authorizing this waiver. This waiver is applicable to any Entitlement CDBG grantee seeking to incur pre-award costs, whose Action Plan submission is delayed past the normal submission date because of delayed enactment of FY 2019 appropriations for the Department. An affected community applying this waiver shall document in writing the conditions giving rise to the need to use this waiver, and maintain the documentation for HUD's review. Grantees' authority to make use of this waiver is only in effect until August 16, 2019, as that is the last date that a grantee may submit its FY 2019 Action Plan.
3. 24 CFR 570.200(h)(1)(i) requires that the activity for which the costs are being incurred must be included in a Consolidated Plan/Action Plan prior to the costs being incurred; grantee compliance with steps 4 and 5 under the general pre-award cost provisions above will meet that requirement. However, grantees must also comply with §570.200(h)(1)(ii), which further specifies that the Plan must advise citizens of the extent to which the pre-award costs will affect future grants. CDBG grantees intending to incur pre-award costs are cautioned that option b. described in Section IV above is not likely to be a feasible alternative for them. HUD advises any Entitlement CDBG grantee intending to incur pre-award costs to follow the process described in Section IV. a. above; in doing so, the grantee will need to ensure that it has met the citizen participation and notification requirements above.
4. Pursuant to § 570.200(h)(1)(iii) and § 570.604, the costs and corresponding activities must comply with the environmental review requirements at 24 CFR Part 58.

C. Additional Provisions: HOME Program

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

1. 24 CFR 92.212(b) defines the effective date for incurring administrative and planning costs to be charged to the HOME allocation as the beginning of the participating jurisdiction's consolidated program year or the date that the Consolidated Plan is received by HUD (whichever is later). Under the provisions of this Notice, a participating jurisdiction's Action Plan may not be submitted to (and thus received by) HUD until several months after the PJ's program year start date. This may negatively affect a participating jurisdiction's ability to incur planning and administrative pre-award costs. Therefore, HUD has issued a waiver of 24 CFR 92.212(b) to the extent necessary to implement an alternative requirement: the effective date of a grantee's FY 2019 grant agreement will be considered to be the earlier of the participating jurisdiction's program year start date or the date that the Consolidated Plan/Action Plan (with actual allocation amounts) is received by HUD.
2. Attachment A contains the HUD memorandum authorizing this waiver. This waiver is applicable to any HOME participating jurisdiction seeking to incur pre-award administrative and planning costs, whose Action Plan submission is delayed past the normal submission date because of delayed enactment of FY 2019 appropriations for the Department. An affected participating jurisdiction applying this waiver shall document in writing the conditions giving rise to the need to use this waiver, and maintain the documentation for HUD's review. A participating jurisdiction's authority to make use of this waiver is only in effect until August 16, 2019, as that is the last date that a grantee may submit its FY 2019 Action Plan.

D. Additional Provisions: ESG Program

An ESG grantee is permitted to incur pre-award costs against its FY 2019 grant, provided that the grantee has met the general conditions described in Section V.A., above, plus the following conditions:

1. The costs and corresponding activities must comply with the ESG Program regulations at 24 CFR Part 576.
2. The costs and corresponding activities must comply with environmental review requirements. The "Moving Ahead for Progress in the 21st Century Act" (MAP-21), (Public Law 112-141) made several changes to HUD's homeless assistance programs, including authorization to permit recipients and other responsible entities to assume HUD environmental review responsibilities in accordance with 24 CFR Part 58. Initially, for FY 2012 ESG funds, ESG projects were subject to the environmental review procedures under 24 CFR Part 50, which assigns HUD all environmental review responsibilities due to the HEARTH Act's repeal of Section 443 of the McKinney-Vento Homeless Assistance Act. Now, recipients or other Responsible Entities assume environmental review responsibilities

under 24 CFR Part 58.

E. Additional Provisions: HOPWA Program

A HOPWA grantee is permitted to incur pre-award costs against its FY 2019 grant, provided that the grantee has met the general conditions described in Section V.A., above, plus the following conditions:

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

F. Additional Provisions: HTF Program

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

VI. Opportunity Zones

Created by the 2017 Tax Cut and Jobs Act, the Opportunity Zone program is designed to stimulate private investment in designated, low-income census tracts nationwide. Since the passage of the law, Opportunity Zones (OZ) have been designated in all 50 states, the District of Columbia, Puerto Rico, and in Insular Areas.

Census tracts were eligible for designation as Opportunity Zones if they satisfied the definition of a “low-income community” (LIC) per § 45D(e) of the Internal Revenue Code. States were limited in the number of tracts they could designate as Opportunity Zones since the number of designated census tracts could not exceed 25 percent of the total number of tracts in the State that met the LIC definition.

The term “low-income community” means any census tract where: (a) the poverty rate for such tract is at least 20 percent, or (b)(i) in the case of a tract not located within a metropolitan area, the median family income for such tract does not exceed 80 percent of statewide median family income, or (b)(ii) in the case of a tract located within a metropolitan area, the median family income for such tract does not exceed 80 percent of the greater of statewide median family income or the metropolitan area median family income. For grantees who are familiar with using New Market Tax Credits (NMTC) as a source for community development finance, these eligibility criteria are the same as the requirements necessary to qualify for NMTC. It is worth noting that some non-LIC

tracts were also eligible for OZ designation if certain additional criteria were met.

This program incentivizes individuals and companies to invest equity in real estate projects or in businesses in these communities. It does so by enabling them to temporarily defer and reduce their tax liability on investments in privately- or publicly-managed Opportunity Funds. These Opportunity Funds must invest funds in real estate projects or businesses located in designated Opportunity Zones. Moreover, if investors leave their investments in these funds long-term, the profits they make on their Opportunity Fund investments will not be taxed.

HUD encourages Community Planning and Development (CPD) program grantees to consider the use of CDBG, HOME, ESG, HOPWA, and HTF funds for eligible activities in Opportunity Zones when developing their Consolidated Plans. CPD will be publishing further guidance in the near future which will provide additional information related to how program funds can be deployed to leverage Opportunity Zone financing.

In the interim, when considering strategies to facilitate the use of CDBG and Section 108 guaranteed loan funds in Opportunity Zones, CPD encourages grantees to explore whether these zones would also qualify as Neighborhood Revitalization Strategy Areas (NRSAs) under [CPD Notice 16-16](#). Compliance with certain CDBG requirements can be streamlined through the designation of NRSA's that may make it more feasible for grantees and their partners to leverage CDBG and Section 108 funds more quickly in Opportunity Zones.

VII. Applicability of This Notice to Future Years

This Notice applies only to Consolidated Plans/Action Plans submitted for FY 2019 funding on or before August 16, 2019, or 60 days after HUD announcement of the FY 2019 allocation amounts for CDBG, ESG, HOME, and HOPWA funding (whichever is earlier). HUD anticipates revising the Consolidated Plan regulations (and other related regulations) to explicitly include, as a basis for disapproval of a Plan, that a Plan does not contain and reflect a grantee's actual allocation amount. For further information on potential rulemaking in this area, see HUD's June 3, 2015, Federal Register Notice (80 FR 31538). That document solicited public comments on possible amendments to the Consolidated Plan regulations and the CDBG Entitlement regulations to effect such a change. See in particular Sections II.B.1., II.B.2 and II.B.7 of the Notice, pages 31544 and 31546. (Please note, however, that the public comment period for that Federal Register Notice has closed.)

For further information:

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

Office of Block Grant Assistance at (202) 708-1577 for the Entitlement CDBG program or (202) 708-1322 for the State CDBG program
Office of Affordable Housing Programs at (202) 708-2684
Office of Special Needs Assistance Programs at (202) 708-4300
Office of HIV/AIDS Housing at (202) 708-1934 or at hopwa@hud.gov

ATTACHMENT A



ASSISTANT SECRETARY FOR
COMMUNITY PLANNING AND DEVELOPMENT

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

NOV 30 2018

MEMORANDUM FOR: Community Planning and Development Field Office
Division Directors

FROM: 
Neal Rackleff, Assistant Secretary, D

SUBJECT: Availability of Waivers of Community Planning and Development
Grant Program Requirements to Facilitate the Ability to Incur
Pre-Award Costs in FY 2019

PURPOSE:

This memorandum explains the availability of waivers of certain statutory and regulatory requirements associated with two Community Planning and Development (CPD) grant programs to facilitate the continuation of eligible activities and ongoing planning and administrative costs due to a delay by HUD in the receipt of annual appropriations for FY 2019. This memorandum covers the following CPD programs:

- Community Development Block Grant (CDBG), and
- HOME Investment Partnerships (HOME)

BACKGROUND:

HUD is issuing procedures to govern the submission and review of action plans for FY 2019 funding prior to the enactment of a FY 2019 appropriation bill. Grantees are advised to not submit a consolidated plan or action plan until the FY 2019 formula allocations have been announced. However, an action plan must be submitted to HUD no later than August 16, 2019.

The likelihood of delays in the receipt of annual appropriations by HUD and implementation of these procedures for FY 2019 may have negative consequences for CDBG and HOME grantees that intend to incur eligible costs prior to the award of FY 2019 funding. Some activities might otherwise be interrupted, and grantees might not otherwise be able to use CDBG or HOME funds for planning and administrative costs of administering their programs.



U. S. Department of Housing and Urban Development

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

May 16, 2019

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

Dear Mr. Harbison:

SUBJECT: Action Plan - Request to Extend Submittal Deadline of the 2019 Action Plan to
July 31, 2019

This letter is in response to the May 10, 2019, letter regarding the above subject matter. In the letter, the Metropolitan Development and Housing Agency (MDHA), as the lead agency of Nashville - Davidson County's Consolidated Planning programs, is in the process of completing the Metropolitan Government's Annual Action Plan. In accordance with Notice CPD-19-01, the Consolidated Plan and Annual Action Plan is due within 60 days of the Department of Housing and Urban Development's (HUD) Notice of Allocations for 2019, which was April 15, 2019. The purpose of the extension request is to allow enough time for MDHA Board approval, Metro Council approval, and for the Mayor to sign the SF 424 and Certifications.

You stated that you anticipate obtaining Metro Council approval at its July 16, 2019, meeting. After Metro Council approval, the Mayor will sign the SF 424 and Certifications; which will then be submitted to HUD for approval no later than July 31, 2019.

This Office has reviewed the justification provided to support the request and the request has been approved. Please keep in mind that the final deadline for receipt of any 2019 Annual Action Plan, is August 16, 2019. As you know, this deadline cannot be waived.

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

Very sincerely yours,

Erik Hoglund, Acting Director
Office of Community Planning
and Development

cc:

Honorable David Briley, Mayor
Metropolitan Government of Nashville – Davidson County
Emel Alexander, Director of Community Development

Bcc: 4JD Read. File; 4JD Central File;

J: lynn holt/Nashville/Action Plan Ext Approval Ltr – Nashville 2019

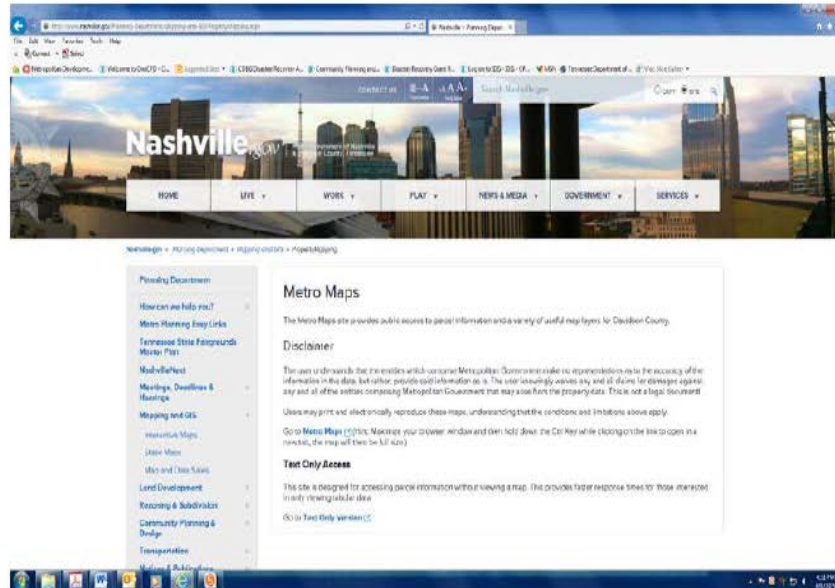
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Name:	Holt					
Date:						

**OFFICIAL RECORD COPY U.S. DEPARTMENT OF HOUSING AND URBAN
DEVELOPMENT**

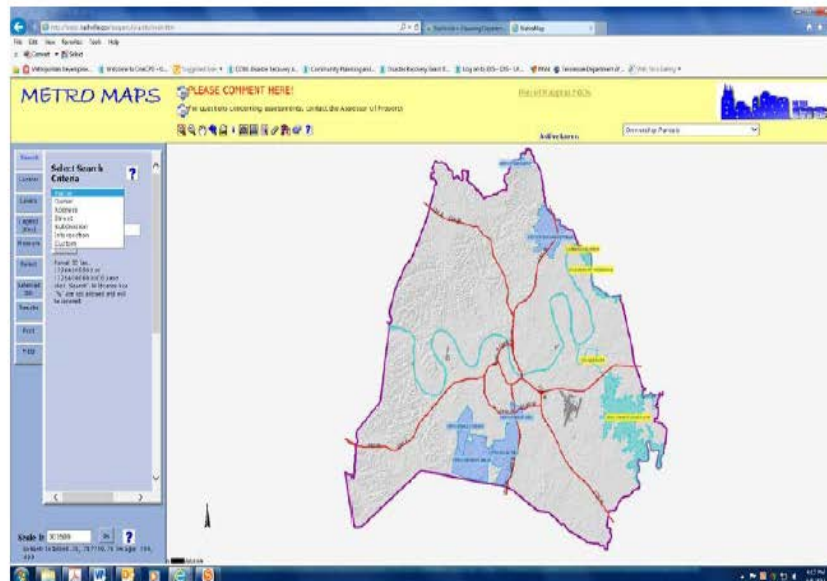
EXHIBIT 2

HOW TO DETERMINE YOUR CENSUS TRACT

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

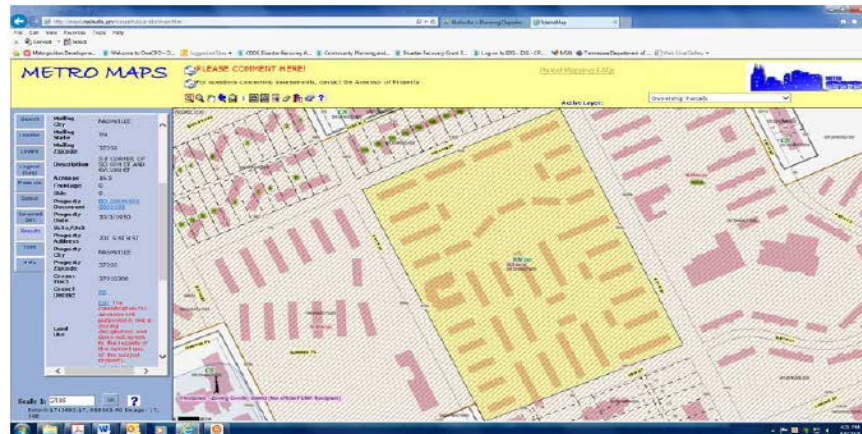


3. In the drop-down box under Select Search Criteria, select Address.



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

6. Under View More Parcel Data, scroll down until you find the Census Tract. The last six numbers identify your Census Tract.



7. If you need assistance, contact the Community Development Department at 615-252-8505.

EXHIBIT 3

HUD NOTIFICATION of 2019 ALLOCATIONS

FY2019 Allocations - Tennessee								
KEY	CNSRTKEY	NAME	STA	CDBG19	HOME19	ESG19	HOPWA19	HTF19
471368		Nashville-Davidson	TN	\$5,112,559	\$2,330,266	\$432,358	\$1,373,743	\$0