

METROPOLITAN NASHVILLE-DAVIDSON COUNTY, TENNESSEE

**APPENDICES**

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

**PROGRAM YEAR FOUR**

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

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**On Behalf of:**

The Metropolitan Government of  
Nashville and Davidson County

Updated May 2, 2016



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

### **Program Year Four**

#### **APPENDICES**

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

**Appendix B - Fair Housing Narrative**

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

**Appendix D - Summary of Consultations**

**Appendix E – Public Notices**

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

**Appendix G – SF 424 and Certifications**

## APPENDIX A

### HOME RESALE/RECAPTURE PROVISIONS

#### I. BACKGROUND

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

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

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

#### II. DEFINITIONS

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

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

### III. PERIOD OF AFFORDABILITY

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

#### a. Period of Affordability Under Resale Provisions

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

#### b. Period of Affordability Under Recapture Provisions

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

The following table outlines the required minimum affordability periods.

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

## **IV. RESALE PROVISIONS**

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

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

### **a. Applicability**

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

### **b. Effect**

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

### **c. Fair Return on Investment**

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

investment, the actual costs of the capital improvements must be documented with receipts, cancelled checks, or other documents acceptable to the PJ.

The PJ shall consider a fair return on investment achieved when the original homebuyer (now the seller) receives from the sale a percentage return on investment based on the change in the Median Sale Price for the Metropolitan Statistical Area, as published periodically by HUD with the FHA Mortgage Limits (also known as the “203(b) limits”).

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

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

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

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

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

#### **d. Continued Affordability**

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

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

#### **e. Imposing Resale Provisions**

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

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

#### **f. Foreclosure**

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

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

### **V. RECAPTURE PROVISIONS**

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

### **a. Applicability**

Recapture Provisions are the PJ's preferred mechanism for securing HOME Program investments and are generally applicable to all PJ homebuyer activities, unless circumstances otherwise require Resale Provisions be used. Specifically, Recapture Provisions are always used in cases involving a Direct Subsidy to a homebuyer. Recapture provisions cannot be used when a project receives only a Development Subsidy and is sold at fair market value, because there is no direct HOME subsidy to recapture from the homebuyer. Instead, Resale Provisions must be used in this case.

### **b. Effect**

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

### **c. Imposing Recapture Provisions**

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

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



#### **d. Foreclosure**

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

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

### **VI. REFINANCING POLICY**

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

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

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

### **VII. MONITORING RESALE & RECAPTURE PROVISIONS**

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

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

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

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

### **VIII. APPROVAL OF CHDO & SUBRECIPIENT PROVISIONS**

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

## APPENDIX B

### FAIR HOUSING NARRATIVE

#### 1. **FAIR HOUSING BACKGROUND**

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

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

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

On December 31, 2015, HUD published in the Federal Register the final Affirmatively Furthering Fair Housing (AFFH) Assessment Tool that CDBG grantees and public housing agencies must use to assess barrier to fair housing. During the 2016 Program Year, MDHA will undertake an Assessment of Fair Housing in accordance with the new Fair Housing Rule. The purpose of this Assessment is to analyze challenges to fair housing and establish goals and priorities to address barriers. MDHA will perform the assessment on behalf of Metro Nashville's entitlement programs and the public housing agency. The assessment will be submitted to HUD in July 2017 and will be used to guide the creation of the next Five Year Consolidated Plan.

## **2. Fair Housing in Nashville**

MDHA works with a variety of local organizations to educate housing organizations and the general public on fair housing and offers some information and referral services itself. The key organizations in the Nashville area that participate in educational and compliance efforts are: the Tennessee Fair Housing Council, the Tennessee Human Rights Commission, the Metro Human Relations Commission, and MDHA. Each organization has its own fair housing education goals and objectives and ideally, all of these organizations implement collaborative efforts to ensure that fair housing education is promoted.

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

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

## **3. Fair Housing Priority Needs and Strategies for Implementation**

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

<b>IMPEDIMENT</b>	<b>STRATEGY</b>
1. Scarcity of Affordable Rental Units	Increase the supply of affordable rental units.

2.	Scarcity of Affordable Housing Units Accessible to People with Disabilities	Increase the supply of housing units for people with disabilities.
3.	Lack of Fair Housing Education, Testing and Enforcement Capacity	Increase fair housing education and build capacity for testing and enforcement of fair housing law.
4.	Uneven Distribution of Community Resources	Support improved access to community resources/implement a place-based strategy for community development.
5.	Restriction on the Expansion of Protected Classes	Continue to operate in compliance with expanded protected class definitions found in federal regulations.

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

### **Actions MDHA will take to Increase the Supply of Affordable Units**

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

### **Increase the Supply of Housing Units for People with Disabilities**

- 2a)** MDHA will develop and adopt a policy requiring a percentage of units in each MDHA-funded development be designed for accessibility by people with physical and/or mental disabilities (even when federal law exempts such units from accessibility requirements) and implement a 1:1 replacement standard for any housing lost from the Agency's inventory of accessible units.
- 2b)** When contemplating the re-designation, redevelopment, or renovation of properties in the future, MDHA will develop a housing strategy in concert with stakeholders and advocates representing affected populations to ensure the displaced residents are provided appropriate housing opportunities. MDHA may count toward its accessible unit requirements units owned by other entities but funded by MDHA.

- 2c)** The Agency will require that any single-family housing built or financed by MDHA incorporate universal design/visitability standards. In the course of construction, MDHA will inspect all units it builds or finances and ensure strict compliance with building codes, particularly with respect to accessibility.
- 2d)** Further, Metro Nashville will continue to follow its process of inspection for compliance with building code provisions, including accessibility requirements, on all multifamily units for which a certificate of occupancy is issued. A further inspection after issuance of such a certificate will be performed if a complaint of non-compliance is received by the Property Standards Division of the Metro Codes. If a violation is found to have occurred, a citation or warrant will be issued and pursued in Environmental Court, as necessary to achieve compliance.

### **Increase Fair Housing Education and Build Capacity for Testing and Enforcement**

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

### **Support improved Access to Community Resources**

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

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

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

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

### **Continue to Operate in Compliance with Federal Regulations**

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

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

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



**2016 ACTION PLAN  
PROPOSED FAIR HOUSING ACTIVITIES**

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

<b>Impediment</b>	<b>Affected Group(s)</b>	<b>Activity</b>
<b>1) Scarcity of Affordable Rental Units</b>	Race/color, National Origin, Religion, Sex, Familial Status, Disability	<b>1b)</b> MDHA will continually research and explore avenues that may become available through public and private sources to be utilized to expand the supply of subsidized existing units for low income households.
<b>Estimated Staff Hours Required</b>		Full time Grant Writer dedicated to this activity
<b>Timetable</b>		Ongoing
<b>Responsible Entity</b>		MDHA



Impediment	Affected Group(s)	Activity
<b>1) Scarcity of Affordable Rental Units</b>	Race/color, National Origin, Religion, Sex, Familial Status, Disability	<b>1d)</b> MDHA will adopt a policy to provide a 1:1 replacement of any affordable housing demolished or otherwise removed from MDHA's inventory and that the replacement is to provide a comparable housing opportunity, but may not necessarily be a physical housing unit.
<b>Estimated Staff Hours Required</b>		40
<b>Timetable</b>		Ongoing
<b>Responsible Entity</b>		MDHA

Impediment	Affected Group(s)	Activity
<b>2) Scarcity of Affordable Housing Units Accessible to People with Disabilities</b>	Disability	<b>2a)</b> MDHA will adopt a policy requiring a percentage of units in each MDHA newly-funded development be designed for accessibility by people with physical and/or mental disabilities (even when federal law exempts such units from accessibility requirements) and implement a 1:1 replacement standard for any housing lost from the Agency's inventory of accessible units.
<b>Estimated Staff Hours Required</b>		40
<b>Timetable</b>		Ongoing
<b>Responsible Entity</b>		MDHA

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

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

<b>Impediment</b>	<b>Affected Group(s)</b>	<b>Activity</b>
<b>2) Scarcity of Affordable Housing Units Accessible to People with Disabilities</b>	Disability	<b>2c)</b> Require any single-family housing built or financed by MDHA incorporate universal design/visitability standards. In the course of construction, MDHA will inspect all units it builds or finances and ensure strict compliance with building codes, particularly with respect to accessibility.
<b>\$ for Activity</b>		HOME: \$500,000 New Construction – Homeowners
<b>Estimated Staff Hours Required</b>		40
<b>Timetable</b>		Ongoing
<b>Performance Indicator</b>		Units
<b>Annual Goal</b>		6
<b>Responsible Entity/Method of Distribution</b>		MDHA, CHDOs, Developers – all funding to CHDOs and Developers awarded through an RFP or application process.

<b>Impediment</b>	<b>Affected Group(s)</b>	<b>Activity</b>
<b>2) Scarcity of Affordable Housing Units Accessible to People with Disabilities</b>	Disability	<b>2d)</b> Metro Nashville will continue to inspect for compliance with building code provisions, including accessibility requirements, on all multifamily units for which a certificate of occupancy is issued. A further inspection after issuance of such a certificate will be performed if a complaint of non-compliance is received by the Property Standards Division of the Metro Codes. If a violation is found to have occurred, a citation or warrant will be issued and pursued in

		Environmental Court, as necessary to achieve compliance.
<b>Estimated Staff Hours Required</b>		0 Additional
<b>Timetable</b>		Ongoing
<b>Responsible Entity</b>		Metro Codes

<b>Impediment</b>	<b>Affected Group(s)</b>	<b>Activity</b>
<b>3) Lack of Fair Housing Education, Testing, and Enforcement Capacity</b>	Race/color National Origin Religion Sex Familiar Status Disability	<b>3a)</b> MDHA has allocated up to \$36,000 in 2016 CDBG public service funds to be awarded to the Tennessee Fair Housing Council. These funds were allocated as part of competitive RFP that was issued in 2015. They continue to provide a comprehensive fair housing testing program in Metro Nashville that was originally started in the 2014 PY. In addition to fair housing testing, the program includes investigations of probable discrimination in the mortgage lending market and possible steering by real estate agents in areas where data indicates racial segregation and to launch and sustain a robust public interest ad campaign to increase the public's awareness of housing discrimination; the process for filing a complaint; and increase opportunities for representation of victims of discrimination in the pursuit of legal recourse.
<b>Estimated Staff Hours Required</b>		1000
<b>Timetable</b>		Program Year 2016
<b>Performance Indicator</b>		Persons
<b>Annual Goal</b>		200
<b>Responsible Entity/Method of Distribution</b>		MDHA and Fair Housing Partner – funds to be distributed through RFP Process for qualified entity to provide services

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

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

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

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

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

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

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

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

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

## APPENDIX C

### ACTIONS PLANNED TO DEVELOP INSTITUTIONAL STRUCTURE DELIVERY SYSTEM

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



## APPENDIX D SUMMARY OF CONSULTATIONS

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

To gather input for the 2016 Action Plan, MDHA held consultations on the following topics: affordable housing and fair housing, non-housing community development, and homelessness and housing for persons with AIDS. Partners, stakeholders, advocates, and government officials were invited. A summary of the responses from the consultation is provided in Appendix D.

- *Affordable housing and fair housing consultation:* Held on October 2, 2015, participants were invited to a Brown Bag lunch at which MDHA provided an overview of activities to address these needs during the current program year and eligible uses of CDBG and HOME funds to create and preserve affordable housing and affirmatively further fair housing. Participants were asked to list the top three barriers to affordable housing; prioritize activities to address affordable housing; prioritize subpopulations to be served by affordable housing programs; prioritize areas where funds for housing should be targeted; and prioritize needs for fair housing education.

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

- *Non-housing community development consultation:* Held on the evening of September 29, 2015, MDHA provided an overview of activities to address these needs during the current program year and eligible uses of CDBG funds. Participants were asked to list the top three barriers to reducing poverty; prioritize non-housing community development needs; list the top three specific non-housing community development activities; select locations where CDBG funds should be targeted; and select a preference between housing or non-housing for the use of CDBG funds.

Participants included at-large community members/leaders, representatives of Bordeaux Hill Neighborhood Association, Martha O'Bryan Center, Metro Social Services, Metropolitan Nashville-Davidson County Parks, Trevecca Urban Farm, Family Children's Service, and Tennessee State University Entrepreneur Center.

- *Homelessness and housing for persons with AIDS consultation:* Held on October 1, 2015, participants were invited to a Brown Bag lunch at which MDHA provided an overview of activities to address these needs during the current program year and eligible uses of ESG and HOPWA funds. Participants were asked to prioritize activities to address homelessness; prioritize sub-populations to be served by homeless assistance programs; prioritize activities to address housing to persons with HIV; list top three barriers to affordable housing for persons/families that are homeless or are at-risk of homelessness; list top three barriers to affordable housing for persons with HIV and their families; describe level of coordination for addressing homelessness among the CoC, housing providers; health, mental health and service agencies, and state and local government agencies and to provide one (1) recommendation for increasing coordination among these agencies; and to rate discharge coordination procedures between the following populations: youth aging from foster care/state custody; persons discharged from health care and mental health facilities; and persons discharged from correctional programs and institutions.

Participants included a clinic that provides direct services for HIV clients; a funder and planning facilitator for HIV services; a representative from the Metropolitan Homelessness Commission; and subrecipients of ESG and HOPWA funds.

Following these consultations, MDHA met with representatives from the Mayor's Office, particularly from the Office of Neighborhoods and Community Engagement, Office of Economic Opportunity and Empowerment, and the Office of Economic and Community Development. MDHA shared the responses from the three consultations and received input for Plan. The representatives emphasized the need for broad-based outreach and utilizing their networks to publicize the Plan.

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

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

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

### **Comments and Analysis**

MDHA hosted a consultation meeting on October 2, 2015 to discuss the Affordable Housing and fair housing needs/priorities for the 2016-2017 Action Plan. Invitees included representatives from local and state government, housing developers, financial institutions, social service providers, and realtors, etc. The meeting was held in the MDHA Cafeteria as a Brown Bag Lunch from 11:00 a.m. to 12:30 p.m. The meeting was attended by 19 persons representing the following groups: Community Homeowner Associations /Activists; Housing Developers/Providers, some certified as Community Housing Development Organizations (CHDOs); Metropolitan Nashville Homelessness Commission; non-profit service providers.

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

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

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

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

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

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

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

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

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

Additional comments:

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

“Placement of housing should be county-wide.”

“Housing counseling should include financial counseling.”

“Less limitations on rental assistance.”

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

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

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

Other subpopulations mentioned were families and special needs.

Additional Comments:

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

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

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

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

“Need more units for large families”.

“Include HIV/AIDS in special needs”.

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

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

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

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

Additional Comments:

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

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

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

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

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

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

Other need mentioned included design/construction.

Additional Comments:

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

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

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

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

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

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

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

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

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

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

“We must find funds for affordable housing”.

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

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

“Incentivize landlords to take HCV”.

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

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

“Criminalizing people for life must be stopped”!

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

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

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

“MDHA must address cluster poverty issues”.

“MDHA must stop unfair TIF redevelopment practices”.

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

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

“Communication is very poor to the community”.

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

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

MDHA will consider all of these comments along with the strategic goals and priorities as determined in the 2013-2018 Con Plan and other regulatory concerns when determining the distribution of funds for housing related activities for the 2016-2017 program year and action plan.

## **Non-Housing Community Development**

### **Comments and Analysis**

MDHA hosted a community-based consultation meeting on September 29, 2015 to discuss the Non-Housing Community Development needs for the 2016-2017 Action Plan. Members of several neighborhood communities and other leaders were invited to attend the meeting. The meeting was held at Randee Rogers Training Center at 5:30 PM. There were 8 community attendees – separated into two discussion tables.

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

#### **1) List the top three barriers to reducing poverty**

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

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

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

#### **2) Prioritize non-housing community development needs**

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

- public facilities (i.e., community centers),



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

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

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

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

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

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

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

### **4) Select the location where CDBG funds should be targeted**

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

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

- Any LMI area (i.e., 51% of HHs with AMI less than or equal to 80%)

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

## **5) Select the preference for use of CDBG funds**

Even though the focus of this consultation was non-housing community development, attendees were asked to state their preference for the distribution of CDBG funds between Housing and Non-Housing Activities. The results showed that 3 attendees preferred that 75% of the CDBG funds be used towards housing needs, 3 attendees preferred 50% of funds toward housing needs, 1 attendee preferred 50% of fund toward non-housing needs and 1 attendee preferred 75% of funds towards non-housing needs.

### **Other Comments**

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

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

In summary, community members feel that housing needs are still the number one concern in their neighborhood communities. However, they also see the need and value in the use of CDBG funds for non-housing needs. Non-housing funds can be used to help address the barriers to reducing poverty such as education and job training/placement. Youth programs, business assistance and microenterprise assistance that place an emphasis on job skills, healthy food options and education and transportation solutions are key elements to alleviating those barriers. Assistance to those areas with the highest concentrations of poverty is most needed per the attendees. MDHA will consider all of these factors along with the strategic goals determined in the 2013-2018 Con Plan and other regulatory concerns when determining the distribution of CDBG funds – housing and non-housing – for the 2016-2017 program year and action plan.

## **Homelessness and Housing for Persons with AIDS 2016 Action Plan Consultation**

### **Comments and Analysis**

MDHA hosted a consultation meeting for Nashville-Davidson County ESG & HOPWA grantees, as well as other interested members of the public, on October 1, 2015. This event was held in the MDHA cafeteria at 11:30 a.m. and lasted for one-and-a-half hours. Twenty-six people attended, representing 17 agencies in the community.

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

#### **Prioritize activities to address homelessness**

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

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

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

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

Persons who are “chronically homeless” often fall into multiple subcategories. Veterans have had enhanced access to SSVF and VASH services as a result of the national agenda to end homelessness among this population, which may be why the community prioritized them below other populations and they do not appear as a priority.

#### **Prioritize activities to address housing for persons with HIV**

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

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

- 1.) Affordable housing or housing stock – Nashville being the “It” city is creating housing costs that are out of reach for homeless people

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

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

- 1.) Affordable and quality units & Permanent supportive housing
- 2.) Lack of adequate income
- 3.) Lack of social supports and coordinated care

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

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

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

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

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

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

More closely connect housing providers (public and private) with service providers, via a number of efforts:

- Developing a list of housing providers that serve low-income/homeless and their requirements
- Implement more effective communication among providers- using Information & Referral and/or Coordinated Entry System
- Regularly train service providers using monthly phone calls, emails or a quarterly meeting
- Fill vacancies from one common, prioritized waitlist

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

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

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

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

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

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

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

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

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

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

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

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

A more direct link is needed between ALL local hospitals and housing/service providers that educates both sides so that care is coordinated prior to discharge. The fledgling “Hospital to Home” program at the Homelessness Commission was cited by several participants as one to watch.

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

Involve existing service & housing providers to integrate/educate at mental health facilities prior to discharge.

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

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

**Additional Comments:**

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

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

The need for more affordable housing, addressing barriers to housing entry such as criminal history and lack of transportation, and the need for more effective coordination were common threads running through this consultation. MDHA will consider all of these factors along with the strategic goals determined in the 2013-2018 Con Plan and other regulatory concerns when determining the distribution of ESG & HOPWA funds for the 2016-2017 program year and action plan.



## **Metro Government Agency**

### **Comments Regarding Action Plan**

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

#### **Economic Development:**

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

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

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



**CDBG Homeowner/Rental Rehabilitation programs:**

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

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

**Distribution of allocated funds and capacity:**

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

**Citizen participation:**

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

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

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

### **Summer Youth programs:**

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

### **HOME programs:**

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

**CHDO capacity building:**

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

## APPENDIX E PUBLIC NOTICES

### PUBLIC NOTICE

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

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

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

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

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

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

**Public Comment Period:** Beginning Monday, March 21, 2016, the draft Substantial Amendment 2 and 2016 Action Plan will be available for public examination and comment. Members of the public may download copies from MDHA's website at [www.nashville-mdha.org/consolidated-plan](http://www.nashville-mdha.org/consolidated-plan) or may request copies by contacting the MDHA Community Development Department at 615-252-8505 or TDD at 615-252-8599. Also, copies will be available at MDHA's Community Development Department, located at 712 South Sixth Street, Nashville, TN 37206, between the hours of 7:30 a.m. and 4:00 p.m., Monday-Friday. MDHA will receive written comments through 4:00 p.m., central time, on Thursday, April 28, 2016. Comments may be submitted electronically at [consolidatedplan@nashville-mdha.org](mailto:consolidatedplan@nashville-mdha.org), faxed to 615-252-8533 (Attention: Consolidated Plan), mailed to MDHA Community Development Department, Attention: Consolidated Plan, P.O. Box 846, Nashville, TN 37202, or hand-delivered to MDHA Community Development Department, Attention: Consolidated Plan, 712 South Sixth Street, Nashville TN 37206.

**Purpose and Summary:** MDHA has prepared for submittal to the U.S. Department of Housing and Urban Development (HUD) a draft Substantial Amendment 2 to the 2013-2018 Consolidated Plan for Housing and Community Development and the 2016-2017 Annual Update for Program Year Four (2016 Action Plan). The draft Substantial Amendment allows Emergency Solution Grant funds to be used for homeless prevention activities.

The 2016 Action Plan describes community needs and funding priorities for the 2016-2017 program year (April 1, 2016 through March 31, 2017) and serves as Metropolitan Nashville-Davidson County's application for receiving funds for the following programs: Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), the Emergency Solutions Grant (ESG), and Housing Opportunities for Persons with AIDS (HOPWA). Proposed funding allocations are intended to address the priority needs identified in the 2013-2018 Consolidated Plan, as amended, and to benefit low- and moderate-income households and areas. Details regarding specific activities to be funded are provided in the 2016 Action Plan.

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

#### Anticipated Resources:

	CDBG	HOME	ESG	HOPWA
2016 Allocation	\$4,559,221.00	\$1,819,757.00	\$416,420.00	\$942,082.00
Estimated Program Income	\$ 300,000.00	\$ 230,000.00	\$ -	\$ -
Carryforward 2015 Funds	\$1,280,000.00	\$ 755,000.00	\$ -	\$ -
Reprogrammed 2015 Funds	\$ 449,954.00	\$ -	\$ -	\$ -
<b>TOTAL</b>	<b>\$6,589,175.00</b>	<b>\$2,804,757.00</b>	<b>\$416,420.00</b>	<b>\$942,082.00</b>

**2015-2016 Proposed Allocations:**

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

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

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

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

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

如果需要本通知的中文翻口, □打□□ 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.





## AVISO PÚBLICO

### SOLICITUD PARA COMENTARIOS PÚBLICOS Y AVISO DE AUDIENCIAS PÚBLICAS ENMIENDA SUSTANCIAL 2 AL PLAN CONSOLIDADO DE 2013 A 2018 PARA VIVIENDAS Y DESARROLLO COMUNITARIO Y ACTUALIZACIÓN ANUAL DE 2016 A 2017 PARA EL CUARTO AÑO DEL PROGRAMA (2016 PLAN DE ACCIÓN)

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

**Miércoles, 6 de abril de 2016 a las 11:30 a.m.**  
MDHA Collaboration Center  
701 South Sixth Street  
Nashville, TN 37206

**Sábado, 9 de abril de 2016 a las 10:00 a.m.**  
J. Henry Hale Apartments Community Room  
1433 Jo Johnston Avenue  
Nashville, TN 37203

**Martes, el 12 de abril de 2016 a las 5:30 p.m.**  
Levy Place Community Room  
303 Foster Street  
Nashville, TN 37207

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

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

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

#### **Prioridades de Subvención:**

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

**Recursos Anticipados:**

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

**Asignaciones Propuestas de 2015-2016:**

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

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

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

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

**Solicitud para Asistencia:** La MDHA hace cada esfuerzo para proporcionar asistencia razonable para ayudar a personas con discapacidades. Cualquier persona que necesite asistencia para acceder esta información o que tenga otras necesidades que requieran asistencia especial puede contactar al 615-252-8555 o al TDD al 615-252-8599.

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

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



## APPENDIX F

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

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

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

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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

A: Yes.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

R: Thank you for your comments and concern.

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

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

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

Q: How do you apply for HVAC?

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

Q: Is the application online?

A: No.

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

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

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

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

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

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

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

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

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

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

- C: I like the idea of the open application process for HOME. It allows for much more flexibility and opportunity for developers.
- R: Please note that while MDHA wants to try this process, we are still bound by a tight turnaround time for commitments to HUD. Therefore, we may still have to release an RFP for funds if there are not enough applications submitted and funded during the application window.
- Q: Would any lots from MDHA be offered as a part of the open application process as is normally included in an RFP? Maybe have a list of lots available?
- A: We will consider the release of lots during the application process.
- C: The time frame of the open application funding could be crucial. Most developers would be using several funding sources and some other agencies, such as THDA may have requirements for funding much like MDHA. This could make it tricky to get all of the funding sources to line up well. However, it is still a much better option to have open applications for 6 months than having to have a project ready one random time a year.
- R: Yes. We are hoping to work to making funding opportunities fall in line with other source time tables so that developers can get the most funding available in a timely manner. We hope to roll this program out in July.
- Q: Under HOME Rental, is the \$275,000 CHDO set aside included in the overall rental budget or is it separate?
- A: It is separate. We may release all of the funds at one time for applications. However, the \$275,000 will remain for CHDOs and not be allowed to be used under other developer projects. Of course, a CHDO can request more than the \$275,000 set aside.
- C: It makes more sense to open all of the funds for projects rather than a separate application for the \$275,000 set aside and then the rest of the funds. Most projects will be over or barely able to stay within the set aside amount, so additional funding would be requested regardless.
- R: Thank you.
- Q: Does the requirement to serve those below 60% AMI apply for rental projects?
- A: Yes [for HOME-funded rental projects].
- Q: Do we still have to submit the massive CHDO certification documentation under the proposed open application process?
- A: Yes. If you are applying for CHDO set aside funds, you must submit your CHDO certification documentation. However, unlike previous years, you will not apply for certification until you apply for an actual project. We will not have the CHDO

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

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

A: Yes.

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

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

Q: What will the prevention activities under ESG encompass?

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

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

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

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

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

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

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

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

sell under the capped limits and break even.

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

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

A: Yes.

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

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

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

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

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

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

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

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

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

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

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



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

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

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

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

### **Comments Submitted in Writing**

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

Dear MDHA,

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

LDG has the following comments:

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

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





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

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

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

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

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

R: Thank you.

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

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

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

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

## **APPENDIX G**

### **CERTIFICATIONS**

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