
METROPOLITAN NASHVILLE-DAVIDSON COUNTY, TENNESSEE

**SUBSTANTIAL AMENDMENT
TO THE
2013-2018 CONSOLIDATED PLAN
AND
2013 ANNUAL ACTION PLAN**

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

August 2013

EXECUTIVE SUMMARY

The Metropolitan Government of Nashville-Davidson County receives funding on an annual basis from the U. S. Department of Housing and Urban Development (HUD) for four Community Planning and Development (CPD) formula grants: the Community Development Block Grant (CDBG); HOME Investment Partnerships Program (HOME); Emergency Solutions Grant (ESG); and Housing Opportunities for Persons with AIDS (HOPWA). These funds are allocated to various activities through the preparation and submission of a five-year Consolidated Plan and annual action plans. The Metropolitan Development and Housing Agency (MDHA) is the lead agency responsible for the development and administration of the Consolidated Plan for Metro Nashville.

MDHA submitted the 2013–2018 Consolidated Plan and 2013 Annual Action Plan to HUD for approval on March 25, 2013. At the time of submission, anticipated funding amounts for the 2013 Program Year were estimated, as the actual allocation amounts were not released. MDHA received notice of the 2013 formula allocations on May 29, 2013. The actual 2013 allocations included increases of 10% in CDBG funding and 4% in HOME funding and decreases of 20% in ESG funding and 5% in HOPWA funding than had been estimated. The Plan was updated in June 2013 to reflect the actual allocations.

During the 2012 Program Year, MDHA undertook a review of expenditures through the use of HUD's Integrated Disbursement and Information System (IDIS), which provides tracking and reporting for the CPD grants. Through this process, MDHA identified previously funded projects/activities with unspent funding and recaptured these funds. Additionally, some previously funded projects have since been completed below budget; and higher than anticipated receipts from program income allowed some projects to be funded completely from program income rather than from grant funds. As a result, \$2,802,098.50 in prior year CDBG funds and \$1,291,620.15 in prior year HOME funds can be re-allocated to activities in the 2013 Annual Action Plan. These additional funds require budget revisions and enable MDHA to add new activities not previously described in the Consolidated Plan and 2013 Annual Action Plan submitted to HUD in March 2013.

The Plan submitted to HUD stated that MDHA would develop and implement a Place-Based Strategy to target community development efforts and resources to specific “priority neighborhood(s)” in order to have a more comprehensive and lasting impact on residents. The Plan, as submitted, provided general criteria on how MDHA would identify priority neighborhood(s) and a general description of activities to be undertaken. As stated in the Plan, MDHA has worked with a HUD-approved technical assistance provider to formalize the strategy and develop more specific details. This amendment describes the methodology for selecting “priority neighborhoods”, activities to be undertaken, and funding allocated to eligible activities.

The proposed budget revisions, addition of new activities, and refinement of the place-based strategy constitute a Substantial Amendment to the 2013 – 2018 Consolidated Plan and 2013 Annual Action Plan. The Citizen Participation requirements contained in Appendix B apply.

PR-15 Citizen Participation

Summarize citizen participation process and how it impacted goal-setting:

Citizen participation regarding this Amendment was achieved through several methods. The Notice of Public Meeting and Request for Public Comment provided below was advertised in *The Tennessean*, *El Crucero*, and *Nashville Pride*. The Public Notice was posted on MDHA's website and at MDHA properties and was emailed to stakeholders, partners, and members of the public on MDHA's email distribution list and who attended prior public meetings. Notice was provided to groups representing minorities and persons who speak languages other than English.

PUBLIC NOTICE

Notice of Public Hearing and Request for Public Comment Substantial Amendment to the 2013-2018 Consolidated Plan and 2013 Annual Action Plan

The Metropolitan Development and Housing Agency (MDHA) has prepared for submittal to the U.S. Department of Housing and Urban Development (HUD) a Substantial Amendment to the 2013-2018 Consolidated Plan for Housing and Community Development and the 2013 Annual Action Plan. The Amendment proposes reprogramming \$2,802,098.50 in prior year Community Development Block Grant (CDBG) funds and \$1,291,620.15 in prior year HOME Investment Partnerships Program (HOME) funds, budget revisions for planned activities, new activities, and refinement of the place-based strategy.

MDHA will host a public meeting on the Substantial Amendment on:

Tuesday, July 23, 2013, 5:30 p.m.
Randee Rogers Training Center
1419 Rosa L. Parks Boulevard
Nashville, TN 37208

Beginning July 1, 2013, the Amendment 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_planning.php or may request copies by contacting the MDHA Community Development Department at 615-252-8505. Copies will be available at MDHA's Community Development Department, located at 712 South Sixth St., Nashville, TN 37206. MDHA will receive written comments through 1:00 p.m., central time, on Thursday, August 1, 2013. Comments may be submitted electronically at comments@nashville-mdha.org, or mailed to MDHA, Community Development Office, Attn: Plan Amendment, P.O. Box 846, Nashville, TN 37202.

Persons who are physically challenged or who have other needs that require special accommodations may contact 615-252-8505.



A summary of comments received at the public hearing and in writing during the public comment period and MDHA's responses will be provided in Appendix A.

SUBSTANTIAL AMENDMENT TO THE 2013-2018 CONSOLIDATED PLAN

The following sections of the 2013-2018 Consolidated Plan – SP-10 and SP-35 – are deleted in the entirety and replaced with the following:

SP-10 Geographic Priorities

Geographic Area:

1. Area Name:

Area Type:

- **Identify the neighborhood boundaries for this target area.**
- **Include specific housing and commercial characteristics of this target area.**
- **How did your consultation and citizen participation process help you to identify this neighborhood as a target area?**
- **Identify the needs in this target area.**
- **What are the opportunities for improvement in this target area?**

Are there barriers to improvement in this target area?

Significant issues identified during the planning process included the uneven distribution of community resources and the concentration of poverty. Many high-poverty neighborhoods are not able to leverage resources or attract investment that is necessary to stabilize the area, improve quality of life, and create opportunities. To help address this issue, MDHA has introduced a new “place-based” approach for targeting its community development efforts rather than distributing limited funds throughout the County.

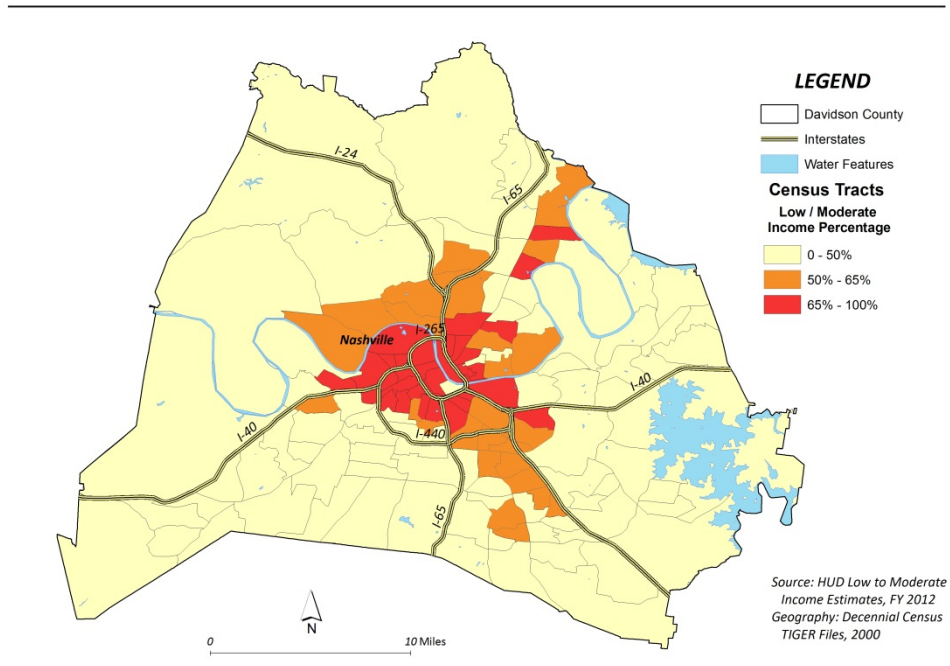
Working with a HUD-approved technical assistance provider, MDHA developed a two-tiered Place-Based Strategy. The purpose of the tiered approach is to provide funding to spur investment in census tracts where at least 65% of households are at or below 80% AMI and to further concentrate funding and programs in a Priority Neighborhood to make a significant impact.

- **Tier I Areas**

Tier I areas are census tracts where at least 65% of households are at or below 80% AMI, as indicated in red on the map below. The following programs will be available in Tier I areas:

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

DAVIDSON COUNTY, TENNESSEE



- **Tier II Priority Neighborhoods**

MDHA, with the support of HUD-approved technical assistance providers, undertook a data-driven analysis in order to identify which neighborhood(s) in Davidson County should be targeted for concentrated place-based investment activities. See Appendix D for more information on the methodology. From this analysis, the North Nashville subarea (as identified on the map below) was selected as the first Tier II Priority Neighborhood.



Source: Metropolitan Planning Department

The North Nashville Community encompasses the areas north and south of Clay Street and I-65, west and east of Clarksville Highway and the CSX Railroad, and south and west of the Cumberland River. It is a collection of several unique urban neighborhoods that share a strong sense of history, identity and community spirit.

North Nashville is centrally located with close proximity to Downtown Nashville, the Cumberland River, and the Midtown medical facilities, and Nashville attractions such as the Bicentennial Mall, the Nashville Farmer's Market. The North Nashville Community is also home to Fisk University, Meharry Medical College, Metro Center, Tennessee State University, and Watkins School of Art and Design.

The following neighborhoods make up the North Nashville Community:

Buena Vista Heights; College Heights/Clifton; Clifton Southwest; Cumberland Gardens; Fisk/Meharry; Germantown; Hadley/Washington Park; Jones/Buena Vista; Osage/North Fisk; Tomorrows' Hope; Salemtown; and Watkins Park.

The neighborhoods that exist within North Nashville range from neighborhoods that are primarily single-family housing to neighborhoods that contain a mixture ranging from single- and two-family to multifamily housing (townhouses, stacked flats and cottages). The Community Character Policies of the 2010 update of North Nashville Community Plan generally place neighborhoods in one of two categories – “maintenance neighborhoods” which indicates that the neighborhood is not anticipated to change significantly within seven to ten years and “evolving neighborhoods,” which indicated the neighborhood or undeveloped land is likely to experience significant change over the next seven to ten years. In the North Nashville Community, maintenance neighborhoods include Buena Vista Heights, Hadley Park, and Elizabeth Park. Meanwhile, evolving neighborhoods include the areas east of Fisk University and parts of Salemtown and McKissack Park. The neighborhoods

are the backbone of the larger community, providing a diversity of housing for resident at every point in the lift cycle.

A Community Plan for North Nashville was updated in 2010 as a part of Nashville's *Concept 2010: A General Plan for Nashville and Davidson County*. This plan encourages a carefully integrated, well-designed mixture of housing types and densities and encourages consideration of several factors including building type and location, and the building's mass, placement, and orientation to strike a balance between providing diversity in housing and maintaining the existing or envisioned character of the neighborhood.

There are several gathering places situated within the neighborhoods or at the edges of adjoining neighborhoods that offer access to retail and services, schools, churches, post offices, employment, and in some cases residential. These community centers range from small-scale neighborhood centers, to moderately-sized community centers like the Rose L. Parks Boulevard and Jefferson Street area.

The North Nashville Community has several prominent corridors, such as Jefferson Street, Clarksville Pike, Buchanan Street and Rosa L. Parks Boulevard and centers ranging from small-scale, such as the corner market, to large-scale, such as the Kroger area. The 2010 update of North Nashville Community Plan emphasized enhancing centers and corridors by adding a mixture of uses, additional housing options, additional connections for pedestrians and cyclists, and additional transportation options such as transit as well as creating well designed land use transitions to adjacent residential areas.

In addition to the programs available to Tier I areas, the following programs will be available:

- Acquisition, Clearance and Demolition, Relocation, and Clean-up
- Infrastructure Development (Commercial)
- Infrastructure Improvements (Residential areas)
- Targeted Housing Rehab (Homeowner and Rental).

To help develop a strategy for implementing these programs and ensure community involvement, MDHA will issue a planning grant to a nonprofit organization that will be selected through a competitive process. Programs and redevelopment strategies shall be consistent with the North Nashville Community Plan as approved by the Metropolitan Planning Commission.

Other Geographic Priorities

An additional need based upon geographic limitations includes the addressing and expansion of homeless and special needs assistance. Most of these resources are currently centrally located in the downtown, or urban core, area of the county. Continued efforts will be undertaken to ensure that these services are provided throughout the whole of the MDHA service area that will provide housing integration between transitional housing and permanent housing in the homeless and special needs populations.

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

SP-35 Anticipated Resources

Expected Resources – Priority Table

Expected Amount Available Year 1

Expected Amount Available Year 1								
Program	Source of Funds	Uses of Funds	Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Expected Amount Available Remainder of ConPlan	Narrative Description
CDBG	Public-federal	-Acquisition -Admin and Planning -Economic Development -Housing -Public Facilities -Public Improvements -Public Services	\$4,694,678.00	\$250,000.00	\$2,802,098.50	\$7,746,776.50	\$14,530,497.88	CDBG funds utilized in priority neighborhoods under the “Place-based strategy” will leverage other federal, local, and private funds

HOME	Public-federal	-Acquisition -Homebuyer assistance -Homeowner rehab and reconstruction -Multifamily rental new construction -Multifamily rental rehab -New construction for ownership	\$1,855,995.00	\$225,000.00	\$1,291,620.15	\$3,372,615.15	\$4,383,117.79	Evaluation criteria for funding HOME criteria places heavy emphasis on financial capacity and ability to secure other funding. Match requirements will be met by requiring organizations to demonstrate at least 25% match as well as through land donations and in-kind.
ESG	Public-federal	-Financial Assistance -Overnight shelter -Rapid re-housing (rental assistance) -Rental Assistance Services -Transitional housing	\$310,953.00	n/a	n/a	\$310,953.00	\$734,346.60	All organizations applying for ESG funds must provide a 100% match of the funds they are seeking. MDHA administration match will be met by in-kind contributions.
HOPWA	Public-federal	-Financial Assistance -Housing -Case Management -Admin and Planning	\$852,786.00	n/a	n/a	\$852,786.00	\$2,693,457.95	HOPWA funds assist persons who have AIDS or are HIV+ and their families
Other – Continuum of Care Program	Public-Federal	-Permanent housing placement	\$1,936,161.00	n/a	n/a	\$1,936,161.00	\$7,744,644.00	Organizations applying for funds are required to match 25% of the funds received through dollars or in-kind

Other – Weatherization Assistance Program	Public-federal (DOE)	-Weatherization measures	\$435,651.00	n/a	n/a	\$435,651.00	\$0.00	WAP funds are used to provide weatherization measures
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Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied:

On May 29, 2013, MDHA received notice of the 2013 formula allocations for Program year 1. Nashville received an unexpected increase in CDBG (10%) and HOME (4%) from the prior year's allocation. Unfortunately, the allocation for HOPWA was 5% less than the prior year and ESG experienced a significant reduction of 20%. The total amount of funding for the four formula grants is \$7,714,412.00. For anticipated allocations for the remainder of the Consolidated Plan, MDHA estimates reflect a 20% reduction each year HOME and ESG and a 10% reduction each year in CDBG & HOPWA. These budget estimates do not include program income estimates or match requirements. Budget estimates for the Continuum of Care over the five-year period are level. The future of the Weatherization Assistance Program and its funding are not clear, and MDHA does not expect to receive additional funding.

In an attempt to offset any further reductions in funding amounts, MDHA will continue to investigate and make application for additional funding streams that remain consistent with MDHA's mission and those that will also further the goals of the Consolidated Plan. MDHA will also work with partner organizations to encourage each of them to leverage available funding sources and build capacity.

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

MDHA owns vacant and improved property throughout the jurisdiction, which has been acquired over the years to address slum and blight. MDHA makes these properties available to Community Housing Development Organizations (CHDOs) to develop affordable housing and is investigating options to self-develop some of these properties for affordable housing or other community development projects that benefit LMI residents.

SUBSTANTIAL AMENDMENT TO THE 2013 ANNUAL ACTION PLAN

The following sections of the 2013 Annual Action Plan – AP-15, AP-20, AP-50, and AP-55 – are deleted in the entirety and replaced with the following. Section AP-35 is a new section.

AP-15 Expected Resources

Introduction:

One of the reasons MDHA elected to undertake a new Consolidated Plan two years early is to address the impact of severe budget cuts that have occurred in recent years. Since 2009, funding for CDBG has decreased by twenty-one percent (21%), and funding for HOME has decreased forty-five percent (45%). Because the cuts affect the scope of services that can be provided, a new Consolidated Plan will allow the City to identify the most pressing needs and develop the most effective strategies to meet those needs for the next five years.

On May 29, 2013, MDHA received notice of the 2013 formula allocations for Program year 1. Nashville received an unexpected increase in CDBG (10%) and HOME (4%) from the prior year's allocation. Unfortunately, the allocation for HOPWA was 5% less than the prior year and ESG experienced a significant reduction of 20%. The total amount of funding for the four formula grants is \$7,714,412.00. For anticipated allocations for the remainder of the Consolidated Plan, MDHA estimates reflect a 20% reduction each year HOME and ESG and a 10% reduction each year in CDBG & HOPWA. These budget estimates do not include program income estimates or match requirements. Budget estimates for Shelter Plus Care over the five-year period are level. The future of the Weatherization Assistance Program and its funding are not clear, and MDHA does not expect to receive additional funding.

Expected Resources – Priority Table

Expected Amount Available Year 1

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Program	Source of Funds	Uses of Funds	Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Expected Amount Available Remainder of ConPlan	Narrative Description
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ESG	Public-federal	-Financial Assistance -Overnight shelter -Rapid re-housing (rental assistance) -Rental Assistance Services -Transitional housing	\$310,953.00	n/a	n/a	\$310,953.00	\$734,346.60	All organizations applying for ESG funds must provide a 100% match of the funds they are seeking. MDHA administration match will be met by in-kind contributions.
HOPWA	Public-federal	-Financial Assistance -Housing -Case Management -Admin and Planning	\$852,786.00	n/a	n/a	\$852,786.00	\$2,693,457.95	HOPWA funds assist persons who have AIDS or are HIV+ and their families
Other – Continuum of Care Program	Public-Federal	-Permanent housing placement	\$1,936,161.00	n/a	n/a	\$1,936,161.00	\$7,744,644.00	Organizations applying for funds are required to match 25% of the funds received through dollars or in-kind

Other – Weatherization Assistance Program	Public-federal (DOE)	-Weatherization measures	\$435,651	n/a	n/a	\$435,651	\$0.00	WAP funds are used to provide weatherization measures
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Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied:

In an attempt to offset any further reductions in funding amounts, MDHA will continue to investigate and make application for additional funding streams that remain consistent with MDHA’s mission and those that will also further the goals of the Consolidated Plan. MDHA requires partner organization to demonstrate financial capacity and ability to leverage other funds and will also work with its partners to build capacity.

The HOME program requires a 25% match of the total HOME funds drawn down for project costs. This match requirement will be met by requiring partners to provide at least a 25% match on projects, by the value of donated land or improvements, or by other eligible methods as provided in the HOME regulations. The match requirement was waived for Nashville-Davidson County for the 2010 and 2011 Program Years due to the flood and declaration as a Federal Disaster Area. To meet the ESG match requirement, all organizations applying for funding must provide a 100% match of the funds they are seeking. This and the MDHA administration match requirements may be satisfied by cash, the value of the time and services provided, or other eligible methods as provided by the ESG regulations.

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

MDHA owns vacant and improved property throughout the jurisdiction, which has been acquired over the years to address slum and blight. MDHA makes these properties available to Community Housing Development Organizations (CHDOs) to develop affordable housing and is investigating options to self-develop some of these properties for affordable housing or other community development projects that benefit LMI residents.

AP-20 Annual Goals and Objectives

CDBG Budget and Annual Goals

COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG)	Priority #	Allocation & Prior Year Funds	Program Income Budget (Estimate)	Performance Indicator	Annual Goal
<u>Eligible Activities</u>					
Acquisition, Disposition, Clearance & Demo, Relocation, Clean-up	5	\$ 260,000.00	\$ 0.00 -	Properties	17
Administration & Planning*	All	\$ 938,935.00	\$ 25,000.00	N/A	N/A
Economic Development: Microenterprise Assistance, Commercial Rehab, Infrastructure Development, Business Assistance, Section 108 Loan Repayment	3, 5	\$ 1,447,841.50	\$ 0.00	Businesses	27
Housing: Homeowner Rehab (<80% AMI), Energy Efficiency Improvements, Rental Rehab, Program Delivery, Housing Services	1, 5	\$ 2,325,000.00	\$ 225,000.00	Housing Units	306
Public Facilities: Infrastructure Improvements, Neighborhood Facilities, Homeless Shelters	4, 5	\$ 1,800,000.00	\$ 0.00 -	Facilities	28
Public Services: Fair Housing, Healthy Food Initiatives, Summer Youth, Services for the Homeless**	3, 6, 8	\$ 700,000.00	\$ 0.00 -	Persons	1900
Other: Section Nonprofit Capacity Building	1, 5	\$ 25,000.00	\$ 0.00	Organizations	2
TOTAL		\$ 7,496,776.50	\$ 250,000.00		
*Subject to 20% cap of Entitlement Allocation & PI					
**Subject to 15% cap of Entitlement Allocation & PI					

HOME Budget and Annual Goals

HOME INVESTMENT PARTNERSHIPS PROGRAM (HOME)	Priority #	Allocation & Prior Year Funds	Program Income Budget (Estimate)	Performance Indicator	Annual Goal
<u>Eligible Activities</u>					
Administration*	1, 5, 8	\$ 185,599.00	\$ 22,500.00	N/A	N/A
Homebuyer (Downpayment) Assistance (<80% AMI)	1, 5	\$ 125,000.00	\$ 0.00	Persons	12
Homeowner Rehab (<80% AMI)	1, 5	\$ 100,000.00	\$ 0.00	Housing Units	2
New Construction - Homeownership (<80%)**	1, 5	\$ 250,000.00	\$ 100,000.00	Housing Units	3
New Construction - Rental (<30% AMI)**	1, 5, 8	\$ 1,000,000.00	\$ 0.00	Housing Units	10 (incl. 2 family)
New Construction - Rental (31-50% AMI)**	1, 5, 8	\$ 600,000.00	\$ 0.00	Housing Units	7 (incl. 1 family)
New Construction - Rental (51-60% AMI)**	1, 5, 8	\$ 400,000.00	\$ 0.00	Housing Units	5 (incl. 1 family)
Rental Rehab (<60%)**	1, 5, 8	\$ 487,016.15	\$ 102,500.00	Housing Units	15
TOTAL		\$ 3,147,615.15	\$ 225,000.00		
*Subject to 10% of Allocation & PI					
**Includes 15% Set-Aside for CHDO Activities					

ESG Budget and Annual Goals***

EMERGENCY SOLUTIONS GRANT (ESG)	Priority #	Allocation	Required Match	Performance Indicator	Annual Goal
<u>Eligible Activities</u>					
Administration*	4	\$ 23,321.00	\$ 23,321.00	N/A	N/A
Emergency Shelter: Operation, Essential Service**	4	\$ 148,745.00	\$ 148,745.00	Persons	2096
Street Outreach**	4	\$ 24,999.00	\$ 24,999.00	Persons	477
HMIS	4	\$ 10,000.00	\$ 10,000.00	Persons	2300
Rapid Re-Housing: Housing Relocation & Stabilization Services	4	\$ 103,888.00	\$ 103,888.00	Persons	97
TOTAL		\$ 310,953.00	\$ 310,953.00		
*Subject to 7.5% cap of Allocation.					
**Total for Emergency Shelter & Street Outreach is subject to 60% cap of Allocation.					
***Allocations are based upon actual awards for 2013 Program Year.					

Estimated HOPWA Budget and Annual Goals**

HOUSING OPPORTUNITIES FOR PERSONS WITH HIV/AIDS (HOPWA)	Priority #	Allocation	Performance Indicator	Annual Goal
<u>Eligible Activities</u>				
Administration*	7	\$ 70,742.00	N/A	N/A
Supportive Services	7	\$ 388,612.00	Households	1,564
Short-term Rent, Mortgage, and/or Utility Payments	7	\$ 245,578.00	Households	275
Rent Subsidies	7	\$ 147,854.00	Households	35
TOTAL		\$ 852,786.00		
*Includes MDHA administration budget of \$25,584.00.				
**Allocations are based upon actual awards for 2013 Program Year.				

AP-35 Projects

Funding Source	CDBG
Activity	Acquisition
Description	MDHA will work with community groups in Tier II priority neighborhood(s) to identify vacant or abandoned properties that are suitable to be acquired for end uses such as public space, community gardens, or housing to be occupied by LMI persons.
2013 Annual Allocation and prior year funds	\$180,000.00
Estimated Amount-Program Income	\$0.00
National Objective	LMA or LMH
Priority Need(s) Addressed	<ul style="list-style-type: none">• Priority #1: Increase Supply of Affordable Housing• Priority #5: Develop and implement place-based strategies for community development.
Target Areas	North Nashville
Performance Indicator	Properties
Annual Goal	7
Method of Distribution	The activity may be undertaken by MDHA or by a contractor/developer selected through competitive procurement as part of a redevelopment project.

Funding Source	CDBG
Activity	Disposition
Description	Cost related to the sale, lease, or donation of real property acquired with CDBG funds or under urban renewal. These costs include the cost of temporarily maintaining property pending disposition and costs incidental to disposition of the property until it can be utilized a public space or affordable housing.
2013 Annual Allocation and prior year funds	\$15,000.00
Estimated Amount-Program Income	\$0.00
National Objective	LMA or LMH
Priority Need(s) Addressed	<ul style="list-style-type: none"> • Priority #1: Increase Supply of Affordable Housing
Target Areas	Countywide (properties owned by MDHA)
Performance Indicator	Properties
Annual Goal	10
Method of Distribution	This activity will be undertaken by MDHA.

Funding Source	CDBG
Activity	Clearance & Demolition
Description	Clearance & Demolition of buildings and/or improvements, or the movement of buildings to other sites. This activity will take place as needed in conjunction with properties acquired through the Acquisition Activity for Tier II Priority Neighborhoods.
2013 Annual Allocation and prior year funds	\$30,000.00
Estimated Amount-	\$0.00
Program Income	
National Objective	LMA or LMH
Priority Need(s) Addressed	<ul style="list-style-type: none"> • Priority #1: Increase Supply of Affordable Housing • Priority #5: Develop and implement place-based strategies for community development.
Target Areas	North Nashville
Performance Indicator	Properties
Annual Goal	7
Method of Distribution	The activity may be undertaken by MDHA or by a contractor/developer selected through competitive procurement as part of a redevelopment project.

Funding Source	CDBG
Activity	Relocation
Description	Relocation payments and other assistance for permanently or temporarily displaced individuals, families, businesses, and nonprofit organizations. Relocation activities will take place as needed in conjunction with properties acquired through the Acquisition Activity in Tier II Priority Neighborhoods.
2013 Annual Allocation and prior year funds	\$10,000.00
Estimated Amount-	\$0.00
Program Income	
National Objective	LMH
Priority Need(s) Addressed	<ul style="list-style-type: none"> • Priority #1: Increase Supply of Affordable Housing • Priority #5: Develop and implement place-based strategies for community development.
Target Areas	North Nashville
Performance Indicator	Properties
Annual Goal	3
Method of Distribution	The activity may be undertaken by MDHA or by a contractor/developer selected through competitive procurement as part of a redevelopment project.

Funding Source	CDBG
Activity	Clean-up
Description	Activities undertaken primarily to clean toxic/environmental waste or contamination from a site. Clean-up activities will take place as needed in conjunction with properties acquired through the Acquisition Activity in Tier II Priority Neighborhoods.
2013 Annual Allocation and prior year funds	\$25,000.00
Estimated Amount-Program Income	\$0.00
National Objective	LMA or LMH
Priority Need(s) Addressed	<ul style="list-style-type: none"> • Priority #1: Increase Supply of Affordable Housing • Priority #5: Develop and implement place-based strategies for community development.
Target Areas	North Nashville
Performance Indicator	Properties
Annual Goal	3
Method of Distribution	The activity may be undertaken by MDHA or by a contractor/developer selected through competitive procurement as part of a redevelopment project.

Funding Source	CDBG
Activity	Administration & Planning
Description	Program administration and overall program management, coordination, monitoring, reporting, and evaluation. Development of the annual action plan, citizen participation, and annual assessments. Planning includes studies, analysis, data gathering, preparation of plans, and identification of actions that will implement plans.
2013 Annual Allocation	\$938,935.00
Estimated Amount-Program Income	\$25,000.00
National Objective	N/A
Priority Need(s) Addressed	<p>In addition to overall administration and planning activities, the following priorities will be addressed:</p> <ul style="list-style-type: none"> • Priority #2: Strengthen collaboration among network of service providers • Priority #5: Develop and implement place-based strategies for community development.
Target Areas	N/A
Performance Indicator	N/A
Annual Goal	N/A
Method of Distribution	MDHA will solicit proposals to award a planning grant in an amount not to exceed \$20,000 to a qualified nonprofit agency to assist with organizing community groups and identifying specific projects to be undertaken in North Nashville as part of the Tier II Place-Based Strategy. All other administrative and planning activities will be undertaken by MDHA.

Funding Source	CDBG
Activity	Economic Development: Commercial Rehab ("Façade Loans)
Description	MDHA will make a range of financing options available to businesses in located in Tier I areas to make exterior (façade) improvements and to correct code violations on their properties. Forms of assistance may include deferred payment and low-interest loans, matching grants, etc. The terms of the loan will vary based on the amount of assistance. The maximum loan amount is \$50,000. All assistance is subject to underwriting review to determine the appropriate amount of assistance. Eligible costs include labor, materials, supplies and soft costs related to the rehabilitation. Landscaping, sidewalks, and driveways are eligible when the cost of such work is incidental to other rehabilitation of the property.
2013 Annual Allocation and prior year funds	\$500,000.00
Estimated Amount-Program Income	\$0.00
National Objective	LMA
Priority Need(s) Addressed	<ul style="list-style-type: none"> • Priority #5: Develop and implement place-based strategies for community development.
Target Areas	Businesses located in Tier I areas.
Performance Indicator	Businesses
Annual Goal	10
Method of Distribution	This program will be administered by MDHA. By application from businesses, funds will be awarded on a first-come, first-serve basis to qualified projects until funding is exhausted.

Funding Source	CDBG
Activity	Economic Development: Infrastructure Development
Description	Infrastructure Development will be available along commercial corridors in Tier II Priority Neighborhoods. Eligible improvements may include curbs, sidewalks, water, sewer, storm drainage, and other public improvements that will enhance and promote the commercial viability of the corridor. MDHA will work with neighborhood business associations to determine the needed improvements.
2013 Annual Allocation and prior year funds	\$250,000.00
Estimated Amount-Program Income	\$0.00
National Objective	LMA
Priority Need(s) Addressed	<ul style="list-style-type: none"> • Priority #5: Develop and implement place-based strategies for community development.
Target Areas	North Nashville
Performance Indicator	Businesses
Annual Goal	2
Method of Distribution	This activity will be undertaken by MDHA.

Funding Source	CDBG
Activity	Economic Development: Business Technical Assistance
Description	Technical assistance and training provided directly to for-profit businesses, including workshops, marketing, and referrals, particularly for businesses that focus on healthy food options and/or are located or may locate in Tier I areas.
2013 Annual Allocation and prior year funds	\$100,000.00
Estimated Amount-Program Income	\$0.00
National Objective	LMA
Priority Need(s) Addressed	<ul style="list-style-type: none"> • Priority #3: Increase access to healthy food options. • Priority #5: Develop and implement place-based strategies for community development.
Target Areas	<ul style="list-style-type: none"> • Metro Nashville census tracts identified as food deserts by the USDA's Economic Research Service. • Tier I areas
Performance Indicator	Businesses
Annual Goal	10
Method of Distribution	This program will be administered by a nonprofit organization selected through a Request for Proposals as the most responsive and responsible proposal.

Funding Source	CDBG
Activity	Economic Development: Microenterprise Assistance
Description	Microenterprise assistance to a commercial enterprise that has five or fewer employees, one or more of whom owns the enterprise and is LMI, particularly for enterprises that focus on healthy food options and/or are located or may locate in Tier I areas.
2013 Annual Allocation and prior year funds	\$115,000.00
Estimated Amount-Program Income	\$0.00
National Objective	LMI
Priority Need(s) Addressed	<ul style="list-style-type: none"> • Priority #3: Increase access to healthy food options. • Priority #5: Develop and implement place-based strategies for community development.
Target Areas	<ul style="list-style-type: none"> • Metro Nashville census tracts identified as food deserts by the USDA's Economic Research Service. • Tier I areas
Performance Indicator	Businesses
Annual Goal	5
Method of Distribution	This program will be administered by a subrecipient organization selected through a Request for Proposals as the most responsive and responsible proposal.

Funding Source	CDBG
Activity	Housing: Homeowner Rehabilitation – Countywide
Description	Assistance to homeowners for repair/rehab of owner-occupied units. Assistance will be in the form of a grant and will be limited to the following repairs or improvements: heat/air, roof repair, plumbing, electrical, and accessibility. Priority will be given to homeowners whose incomes are at or below 50% AMI, persons with disabilities, and the elderly (age 62+).
2013 Annual Allocation and prior year funds	\$1,000,000.00
Estimated Amount-	\$125,000.00
Program Income	
National Objective	LMH
Priority Need(s) Addressed	Priority #1: Increase supply of affordable housing.
Target Areas	Countywide
Performance Indicator	Housing units
Annual Goal	100
Method of Distribution	This program will be administered directly by MDHA. By application from homeowners, funds will be allocated on a first-come, first-serve basis to eligible households until funding is exhausted.

Funding Source	CDBG
Activity	Housing: Homeowner Rehabilitation – Targeted
Description	Assistance targeted to homeowners for repair/rehab of owner-occupied units in Tier II Priority Neighborhoods. Assistance will be in the form of a grant and be limited to the following repairs or improvements: heat/air, roof repair, plumbing, electrical, and accessibility. Additionally, MDHA will work with the neighborhood to identify a street(s) to target for primarily exterior, aesthetic repairs/rehab of owner-occupied units. This assistance will also be in the form of a grant and repairs or improvements will include painting, siding repair, etc. Priority for targeted rehab will be given to homeowners whose incomes are at or below 50% AMI, persons with disabilities, and the elderly (age 62+).
2013 Annual Allocation and prior year funds	\$250,000.00
Estimated Amount-Program Income	\$100,000.00
National Objective	LMH
Priority Need(s) Addressed	<ul style="list-style-type: none"> • Priority #1: Increase supply of affordable housing. • Priority #5: Develop and implement place-based strategies for community development.
Target Areas	North Nashville
Performance Indicator	Housing units
Annual Goal	25
Method of Distribution	MDHA will work with the community to identify streets to be targeted for the improvements associated with this activity. MDHA may elect to administer this program or procure a nonprofit organization selected through a Request for Proposals as the most responsive and responsible proposal to administer the program. By application from homeowners, funds will be allocated on a first-come, first-serve basis to eligible households until funding is exhausted.

Funding Source	CDBG
Activity	Housing: Homeowner Rehabilitation – Energy Efficiency Improvements
Description	Assistance to homeowners for the sole purpose of improving energy efficiency of owner-occupied units. Assistance will be in the form of a grant up to \$10,000 and will be limited to items that will reduce utility costs. Priority will be given to homeowners whose incomes are at or below 50% AMI, persons with disabilities, and the elderly (age 62+).
2013 Annual Allocation and prior year funds	\$250,000.00
Estimated Amount-Program Income	\$0.00
National Objective	LMH
Priority Need(s) Addressed	<ul style="list-style-type: none"> • Priority #1: Increase supply of affordable housing.
Target Areas	County-wide
Performance Indicator	Housing units
Annual Goal	25
Method of Distribution	This program may be administered by MDHA or a nonprofit organization selected through a competitive process. By application from homeowners, funds will be allocated on a first-come, first-serve basis to eligible households until funding is exhausted.

Funding Source	CDBG
Activity	Housing: Rental Rehabilitation – Countywide
Description	Assistance to landlords to rehabilitate substandard rental (single or multi-unit) property to correct code violations. Assistance will be in the form of a 3% loan, repayable over various time frames. Units must be occupied by households with incomes at or below 60% AMI.
2013 Annual Allocation and prior year funds	\$200,000.00
Estimated Amount-Program Income	\$0.00
National Objective	LMH
Priority Need(s) Addressed	<ul style="list-style-type: none"> • Priority #1: Increase supply of affordable housing. • Priority #8: Affirmatively further fair housing.
Target Areas	Countywide
Performance Indicator	Housing units
Annual Goal	8
Method of Distribution	This program will be administered by MDHA. By application from landlords, funds will be awarded on a first-come, first-serve basis to eligible households until funding is exhausted.

Funding Source	CDBG
Activity	Housing: Rental Rehabilitation – Targeted
Description	Assistance to landlords to rehabilitate substandard rental (single or multi-unit) property located in Tier II Priority Neighborhoods to correct code violations. Assistance will be in the form of a 3% loan, repayable over various time frames. Units must be occupied by households with incomes at or below 60% AMI.
2013 Annual Allocation and prior year funds	\$200,000.00
Estimated Amount-Program Income	\$0.00
National Objective	LMH
Priority Need(s) Addressed	<ul style="list-style-type: none"> • Priority #1: Increase supply of affordable housing. • Priority #5: Develop and implement place-based strategies for community development • Priority #8: Affirmatively further fair housing.
Target Areas	North Nashville
Performance Indicator	Housing units
Annual Goal	8
Method of Distribution	MDHA will work with the community to identify streets to be targeted for the improvements associated with this activity. MDHA may elect to administer this program or procure a nonprofit organization selected through a Request for Proposals as the most responsive and responsible proposal to administer the program. By application from landlords, funds will be allocated on a first-come, first-serve basis to eligible households until funding is exhausted.

Funding Source	CDBG
Activity	Housing: Rehabilitation – Program Delivery
Description	All delivery costs (including staff, other direct costs, and service costs) directly related to carrying out housing rehabilitation activities. Examples include appraisal, architectural, engineering, and other professional services; preparation of work specifications and work write-ups; loan processing; survey, site and utility plans; application processing and other fees.
2013 Annual Allocation and prior year funds	\$400,000.00
Estimated Amount-Program Income	\$0.00
National Objective	LMH
Priority Need(s) Addressed	<ul style="list-style-type: none"> • Priority #1: Increase supply of affordable housing.
Target Areas	Countywide
Performance Indicator	Housing units
Annual Goal	100
Method of Distribution	This activity will be undertaken by MDHA staff and contractors and engineers procured through a competitive process.

Funding Source	CDBG
Activity	Housing: Housing Services
Description	Housing service/delivery costs in support of housing developed through the HOME program (including staff, other direct costs, and service costs) directly related to carrying out HOME housing activities.
2013 Annual Allocation and prior year funds	\$25,000.00
Estimated Amount-Program Income	\$0.00
National Objective	LMH
Priority Need(s) Addressed	<ul style="list-style-type: none"> • Priority #1: Increase supply of affordable housing. • Priority #8: Affirmatively further fair housing.
Target Areas	Countywide
Performance Indicator	Housing units
Annual Goal	54
Method of Distribution	This activity will be undertaken by MDHA.

Funding Source	CDBG
Activity	Public Facilities: Homeless and Other Shelters
Description	Funding for rehabilitation of homeless shelters (emergency and transitional) and domestic violence shelters. Eligible costs include energy efficiency improvements and accessibility improvement. Operation and maintenance costs are ineligible.
2013 Annual Allocation and prior year funds	\$1,000,000.00
Estimated Amount-Program Income	\$0.00
National Objective	LMC
Priority Need(s) Addressed	<ul style="list-style-type: none"> • Priority #4: Decrease homelessness.
Target Areas	Countywide
Performance Indicator	Facilities
Annual Goal	10
Method of Distribution	Projects will be selected for funding through a Request for Proposals. Proposals will be evaluated by a Review Committee comprised of MDHA staff and a representative of the Metro Homelessness Commission and will be evaluated in accordance with the evaluation criteria contained in the RFP and ranked from highest to lowest. Funding will be awarded for projects according to their overall rank until funding is exhausted. However, projects that receive a score of 60 or less will not be eligible for funding.

Funding Source	CDBG
Activity	Public Facilities: Neighborhood Facilities
Description	Financial assistance up to \$100,000 for construction of a new or expansion and/or rehabilitation of existing neighborhood facilities located in Tier I areas owned by a nonprofit or public agency including, but not limited to, community centers, youth centers, senior centers, and parks. Facilities must be open to the general public during normal working hours. Eligible costs include energy efficiency improvements and accessibility improvements. Operation and maintenance costs are ineligible.
2013 Annual Allocation and prior year funds	\$300,000.00
Estimated Amount-Program Income	\$0.00
National Objective	LMA
Priority Need(s) Addressed	<ul style="list-style-type: none"> • Priority #5: Develop and implement place-based strategies for community development.
Target Areas	Tier I areas
Performance Indicator	Facilities
Annual Goal	3
Method of Distribution	Projects will be selected for funding through a Request for Proposals. Proposals will be evaluated by a Review Committee comprised of MDHA staff and will be evaluated in accordance with the evaluation criteria contained in the RFP and ranked from highest to lowest. Funding will be awarded for projects according to their overall rank until funding is exhausted. However, projects that receive a score of 60 or less will not be eligible for funding.

Funding Source	CDBG
Activity	Public Facilities: Infrastructure Improvements
Description	Construction and installation of infrastructure improvements in Tier II Priority Neighborhoods. Eligible improvements include development of open space for parks, recreational facilities, flood drainage improvements, water/sewer improvements, street improvements, and sidewalks.
2013 Annual Allocation and prior year funds	\$500,000.00
Estimated Amount-Program Income	\$0.00
National Objective	LMA
Priority Need(s) Addressed	<ul style="list-style-type: none"> • Priority #5: Develop and implement place-based strategies for community development.
Target Areas	North Nashville
Performance Indicator	Facilities
Annual Goal	2
Method of Distribution	MDHA will consult with other Metro Departments to attempt to coordinate infrastructure with other planned improvements for the neighborhoods. Additionally, MDHA will meet with neighborhood groups to get their input in order to prioritize infrastructure improvements. These activities will be administered by MDHA and/or responsible departments in Metro Government.

Funding Source	CDBG
Activity	Public Services: Summer Youth Program
Description	Summer youth programs provided by nonprofit organizations and public agencies from June 1 through July 31. These programs enhance participants' academic, artistic, and athletic interests, as well as promote job skills development and healthy lifestyles, to help prepare Metro Nashville's youth to become successful adults.
2013 Annual Allocation	\$400,000.00
Estimated Amount-Program Income	\$0.00
National Objective	LMC
Priority Need(s) Addressed	<ul style="list-style-type: none"> • Priority 6: Provide summer programs for low- and moderate-income children and youth.
Target Areas	Countywide
Performance Indicator	Persons
Annual Goal	1,400
Method of Distribution	Programs will be selected for funding through a Request for Proposals. Proposals will be evaluated by a Review Committee comprised of MDHA staff and a community representatives and will be evaluated in accordance with the evaluation criteria contained in the RFP and ranked from highest to lowest. Funding will be awarded for programs according to their overall rank until funding is exhausted. However, programs that receive a score of 60 or less will not be eligible for funding.

Funding Source	CDBG
Activity	Public Services: Fair Housing
Description	Fair housing counseling, outreach, and education; conduct complaint-based and targeted testing, primarily in Tier I areas.
2013 Annual Allocation	\$75,000.00
Estimated Amount-Program Income	\$0.00.00
National Objective	LMA and LMC
Priority Need(s) Addressed	<ul style="list-style-type: none"> • Priority #8: Affirmatively further fair housing.
Target Areas	Tier I areas
Performance Indicator	Persons
Annual Goal	300
Method of Distribution	Program will be administered by a nonprofit organization or an institution selected through a Request for Proposals as the most responsive and responsible proposal. Proposals will be evaluated by a Review Committee comprised of MDHA staff and will be evaluated in accordance with the evaluation criteria contained in the RFP and ranked from highest to lowest. Funding will be awarded for the Proposal with the highest score.

Funding Source	CDBG
Activity	Public Services: Healthy Food Initiatives
Description	Public service and outreach/education campaign on making healthy food choices and preparing healthy food, particularly directed to migrant populations, low-income families, and homeless populations.
2013 Annual Allocation	\$25,000.00
Estimated Amount-Program Income	\$0.00
National Objective	LMA
Priority Need(s) Addressed	<ul style="list-style-type: none"> • Priority #3: Increasing access to healthy food choices.
Target Areas	Metro Nashville census tracts identified as food deserts by the USDA's Economic Research Service.
Performance Indicator	Persons
Annual Goal	200
Method of Distribution	Program will be administered by a nonprofit organization selected through a Request for Proposals as the most responsive and responsible proposal. Proposals will be evaluated by a Review Committee comprised of MDHA staff and will be evaluated in accordance with the evaluation criteria contained in the RFP and ranked from highest to lowest. Funding will be awarded for the Proposal with the highest score.

Funding Source	CDBG
Activity	Public Services: Services for Homeless Persons
Description	Payment of first month's rent and security/utility deposits for homeless persons that find housing through the Section 8 Preference and/or VASH in conjunction with the 100,000 Homes Campaign. Assistance will be limited to one-time payments not to exceed \$1,000 per household.
2013 Annual Allocation	\$200,000.00
Estimated Amount-Program Income	\$0.00
National Objective	LMH
Priority Need(s) Addressed	<ul style="list-style-type: none"> • Priority #4: Decrease Homelessness.
Target Areas	Countywide
Performance Indicator	Persons
Annual Goal	200
Method of Distribution	MDHA will partner with the Metro Homelessness Commission, acting as a subrecipient, to make payments directly to landlords and utility providers on behalf of each recipient.

Funding Source	CDBG
Activity	Other: Nonprofit Organization Capacity Building
Description	Activities specifically designed to increase the capacity of nonprofit organizations to carry out eligible neighborhood revitalization or economic development activities. Assistance provided through this activity will be targeted to organizations serving Tier I areas.
2013 Annual Allocation and prior year funds	\$25,000.00
Estimated Amount-Program Income	\$0.00
National Objective	All
Priority Need(s) Addressed	<ul style="list-style-type: none"> • Priority #1: Increase Supply of Affordable Housing • Priority #5: Develop and implement place-based strategies for community development.
Target Areas	Tier I areas
Performance Indicator	Organizations
Annual Goal	2
Method of Distribution	Program will be administered by a nonprofit organization selected through a Request for Proposals as the most responsive and responsible proposal. Proposals will be evaluated by a Review Committee comprised of MDHA staff and will be evaluated in accordance with the evaluation criteria contained in the RFP and ranked from highest to lowest. Funding will be awarded for the Proposal with the highest score.

Funding Source	CDBG
Activity	Section 108 Loan Repayment
Description	Funds will be used to make principal and interest payments on a Section 108 loan.
2013 Annual Allocation	\$482,841.50
Estimated Amount-Program Income	\$0.00
National Objective	N/A
Priority Need(s) Addressed	N/A
Target Areas	N/A
Performance Indicator	N/A
Annual Goal	N/A
Method of Distribution	N/A

Funding Source	HOME
Activity	Administration
Description	Provide grant compliance and oversight of HOME-funded programs. Program administration costs include staff and related costs required for overall program management, coordination, monitoring, reporting, and evaluation.
2013 Annual Allocation and prior year funds	\$185,599.00
Estimated Amount-Program Income	\$22,500.00
National Objective	N/A
Priority Need(s) Addressed	N/A
Target Areas	N/A
Performance Indicator	N/A
Annual Goal	N/A
Method of Distribution	Administrative activities will be undertaken by MDHA.

Funding Source	HOME
Activity	HOME: Homebuyer (Downpayment) Assistance
Description	Financial assistance to homebuyers for the purchase of a home. Household income must not exceed 80% AMI, and recipients must complete housing counseling.
2013 Annual Allocation and prior year funds	\$125,000.00
Estimated Amount-Program Income	\$0.00
National Objective	LMH
Priority Need(s) Addressed	<ul style="list-style-type: none"> • Priority #1: Increase supply of affordable housing
Target Areas	Countywide
Performance Indicator	Persons
Annual Goal	12
Method of Distribution	The program will be administered by MDHA or a subrecipient that is qualified and has experience with similar programs. MDHA/subrecipient will accept applications as long as funding is available. Funds will be allocated on a first-come, first-serve basis to eligible households until funding is exhausted.

Funding Source	HOME
Activity	Homeowner Rehab
Description	Assistance to homeowners for large-scale rehabilitation or reconstruction of owner-occupied units. Rehab/reconstruction must meet Housing Quality Standards. Assistance will be in the form of a no interest loan that will be forgiven on a pro rata basis for a specified period of time as long as the owner occupies the property. Priority will be given to homeowners whose incomes are at or below 50% AMI, persons with disabilities, and the elderly (age 62+).
2013 Annual Allocation and prior year funds	\$100,000.00
Estimated Amount-Program Income	\$0.00
National Objective	LMH
Priority Need(s) Addressed	<ul style="list-style-type: none"> • Priority #1: Increase supply of affordable housing • Priority #5: Develop and implement place-based strategies for community development.
Target Areas	Countywide
Performance Indicator	Housing units
Annual Goal	2
Method of Distribution	MDHA will administer this program. By application from homeowners, funds will be allocated on a first-come, first-serve basis to eligible households until funding is exhausted.

Funding Source	HOME
Activity	New Construction – Homeownership
Description	Funding for development of affordable housing for housing to be sold to households with incomes at or below 80% AMI. However, if homes are not sold within 6 months of completion, the home must be rented to a household at or below 80% AMI. Financial assistance may be in the form predevelopment loans, construction loans, and permanent financing. Eligible uses of funds include acquisition, site preparation, construction, and soft costs. All projects will be subject to underwriting by MDHA.
2013 Annual Allocation and prior year funds	\$250,000.00
Estimated Amount-Program Income	\$100,000.00
National Objective	LMH
Priority Need(s) Addressed	<ul style="list-style-type: none"> • Priority #1: Increase supply of affordable housing • Priority #5: Develop and implement place-based strategies for community development.
Target Areas	Countywide
Performance Indicator	Housing units
Annual Goal	2
Method of Distribution	MDHA may elect to undertake development and/or procure developers, including CHDOs, through a competitive process. MDHA will announce at least one funding opportunity for CHDOs during the program year.

Funding Source	HOME
Activity	New Construction – Rental Housing
Description	Funding for development of affordable housing for rent to households with incomes at or below 60% Financial assistance may be in the form predevelopment loans, construction loans, and permanent financing. Eligible uses of funds include acquisition, site preparation, construction, and soft costs. All projects will be subject to underwriting by MDHA and must meet HOME Site and Neighborhood Standards.
2013 Annual Allocation and prior year funds	<ul style="list-style-type: none"> • Households <30% AMI: \$1,000,000.00 • Households 31-50% AMI: \$600,000.00 • Households 51-60% AMI: \$400,000.00
Estimated Amount-Program Income	\$0.00
National Objective	LMH
Priority Need(s) Addressed	<ul style="list-style-type: none"> • Priority #1: Increase supply of affordable housing • Priority #5: Develop and implement place-based strategies for community development • Priority #8: Affirmatively further fair housing.
Target Areas	Countywide
Performance Indicator	Housing units
Annual Goal	<ul style="list-style-type: none"> • Households <30% AMI: 10 units, including 2 families • Households 31-50% AMI: 7 units, including 1 family • Households 51-60% AMI: 5 units, including family
Method of Distribution	MDHA may elect to undertake development and/or procure developers, including CHDOs, through a competitive process. MDHA will announce at least one funding opportunity for CHDOs during the program year.

Funding Source	HOME
Activity	Rental Rehab
Description	Assistance to developers (including CHDOs) to acquire and rehabilitate substandard rental property to correct code violations. Units must be occupied by tenant with incomes at or below 60% AMI. In projects with 5 or more HOME-assisted units, at least 20% of the units must serve households at or below 50% AMI.
2013 Annual Allocation and prior year funds	\$487,016.15
Estimated Amount-	\$102,500.00
Program Income	
National Objective	LMI
Priority Need(s) Addressed	<ul style="list-style-type: none"> • Priority #1: Increase supply of affordable housing • Priority #5: Develop and implement place-based strategies for community development • Priority #8: Affirmatively further fair housing.
Target Areas	Countywide
Performance Indicator	Housing units
Annual Goal	15
Method of Distribution	MDHA may elect to undertake development and/or procure developers, including CHDOs, through a competitive process. MDHA will announce at least one funding opportunity for CHDOs during the program year.

Funding Source	ESG
Activity	Administration
Description	Provide grant compliance and oversight of ESG-funded programs. Program administration costs include staff and related costs required for overall program management, coordination, monitoring, reporting, and evaluation.
2013 Annual Allocation	\$23,321.00
Required Match (Estimated)	\$23,321.00
National Objective	N/A
Priority Need(s) Addressed	N/A
Target Areas	N/A
Performance Indicator	N/A
Annual Goal	N/A
Method of Distribution	Administrative activities will be undertaken by MDHA.

Funding Source	ESG
Activity	Emergency Shelter: Operation, Essential Service
Description	<ul style="list-style-type: none"> • <u>Shelter Operations</u>, including maintenance, rent, repair, security, fuel, equipment, insurance, utilities, relocation, and furnishings. The interim ESG rule adds to the list of eligible shelter activities the costs of supplies and motel/hotel stays in certain cases. <p>ESG funds may be used for emergency shelters only. A transitional facility will only be eligible to receive ESG funds if EITHER:</p> <p>It meets BOTH of the following criteria under the new <i>emergency shelter</i> definition:</p> <p>(a) its primary purpose is to provide a temporary shelter for the homeless in general or for specific populations of the homeless; and</p> <p>(b) it does not require occupants to sign leases or occupancy agreements;</p> <p>OR</p> <p>It received funds under a FY 2010 ESG grant and met the criteria under the former emergency shelter definition (“any facility, the primary purpose of which is to provide temporary or transitional shelter for the homeless”).</p> <ul style="list-style-type: none"> • <u>Essential Services</u>, such as case management, childcare, education services, employment assistance and job training, outpatient health services, legal services, life skills training, mental health services, substance abuse treatment services, transportation, and services for special populations.
2013 Annual Allocation	\$148,745.00
Required Match (Estimated)	\$148,745.00
National Objective	LMI
Priority Need(s) Addressed	<ul style="list-style-type: none"> • Priority #4: Decrease homelessness.
Target Areas	Countywide

Performance Indicator	Persons
Annual Goal	2,096
Method of Distribution	Projects will be selected for funding through a Request for Proposals. Proposals will be evaluated by a Review Committee comprised of MDHA staff, homeless advocates, and representatives of affordable housing agencies and will be evaluated in accordance with the evaluation criteria contained in the RFP and ranked from highest to lowest. Funding will be awarded for projects according to their overall rank until funding is exhausted.

Funding Source	ESG
Activity	Street Outreach
Description	Reaching out to unsheltered homeless individuals and families, connecting them with emergency shelter, housing, or critical services, and providing them with urgent, non-facility-based care. Eligible costs include engagement, case management, emergency health and mental health services, and transportation.
2013 Annual Allocation	\$24,999.00
Required Match (Estimated)	\$24,999.00
National Objective	LMI
Priority Need(s) Addressed	<ul style="list-style-type: none"> • Priority #4: Decrease homelessness.
Target Areas	Countywide
Performance Indicator	Persons
Annual Goal	477
Method of Distribution	Projects will be selected for funding through a Request for Proposals. Proposals will be evaluated by a Review Committee comprised of MDHA staff, homeless advocates, and representatives of affordable housing agencies and will be evaluated in accordance with the evaluation criteria contained in the RFP and ranked from highest to lowest. Funding will be awarded for projects according to their overall rank until funding is exhausted.

Funding Source	ESG
Activity	HMIS
Description	Costs of participating in an existing HMIS of the Continuum of Care where the project is located.
2013 Annual Allocation	\$10,000.00
Required Match (Estimated)	\$10,000.00
National Objective	LMI
Priority Need(s) Addressed	<ul style="list-style-type: none"> • Priority #4: Decrease homelessness.
Target Areas	Countywide
Performance Indicator	Persons
Annual Goal	2,300
Method of Distribution	Funds will be retained by MDHA for related costs.

Funding Source	ESG
Activity	Rapid Re-housing: Housing Relocation & Stabilization Services
Description	Services and direct housing assistance to help people who are homeless move quickly into permanent housing and achieve stability in that housing. Eligible costs include utilities, rental application fees, security deposits, last month's rent, utility deposits and payments, moving costs, housing search and placement, housing stability case management, landlord-tenant mediation, tenant legal services, and credit repair.
2013 Annual Allocation	\$103,888.00
Required Match (Estimated)	\$103,888.00
National Objective	LMI
Priority Need(s) Addressed	<ul style="list-style-type: none"> • Priority #4: Decrease homelessness.
Target Areas	Countywide
Performance Indicator	Persons
Annual Goal	97
Method of Distribution	Projects will be selected for funding through a Request for Proposals. Proposals will be evaluated by a Review Committee comprised of MDHA staff, homeless advocates, and representatives of affordable housing agencies and will be evaluated in accordance with the evaluation criteria contained in the RFP and ranked from highest to lowest. Funding will be awarded for projects according to their overall rank until funding is exhausted.

Funding Source	HOPWA
Activity	Administration
Description	Provide grant compliance and oversight of HOPWA-funded programs. Program administration costs include staff and related costs required for overall program management, coordination, monitoring, reporting, and evaluation.
2013 Annual Allocation	\$70,742.00 (includes \$25,584.00 for MDHA administrative costs)
National Objective	N/A
Priority Need(s) Addressed	<ul style="list-style-type: none"> • Priority #7: Provide housing assistance for persons with HIV/AIDS
Target Areas	MSA
Performance Indicator	N/A
Annual Goal	N/A
Method of Distribution	\$25,584 will be retained by MDHA. The remaining \$47,852.00 will be awarded to selected Sponsors. Sponsors will be selected for funding through a Request for Proposals. Proposals will be evaluated by a Review Committee comprised of MDHA staff, representatives of programs that serve persons living with HIV/AIDS, or individuals that are knowledgeable about various aspects of housing services. Proposals will be evaluated in accordance with the evaluation criteria contained in the RFP and ranked from highest to lowest. Funding will be awarded for projects according to their overall rank until funding is exhausted.

Funding Source	HOPWA
Activity	Supportive Services
Description	Services supporting the housing stability of program participants. Supportive services include, but are not limited to, health, mental health, assessment, permanent housing placement, drug and alcohol abuse treatment and counseling, day care, personal assistance, nutritional services, intensive care when required, and assistance in gaining access to local, State, and Federal government benefits and services, except that health services may only be provided to individuals with acquired immunodeficiency syndrome or related diseases and not to family members of these individuals.
2013 Annual Allocation	\$388,612.00
National Objective	N/A
Priority Need(s) Addressed	<ul style="list-style-type: none"> • Priority #7: Provide housing assistance for persons with HIV/AIDS
Target Areas	MSA
Performance Indicator	Households
Annual Goal	1,564
Method of Distribution	Sponsors will be selected for funding through a Request for Proposals. Proposals will be evaluated by a Review Committee comprised of MDHA staff, representatives of programs that serve persons living with HIV/AIDS, or individuals that are knowledgeable about various aspects of housing services. Proposals will be evaluated in accordance with the evaluation criteria contained in the RFP and ranked from highest to lowest. Funding will be awarded for projects according to their overall rank until funding is exhausted.

Funding Source	HOPWA
Activity	Short-term Rent, Mortgage, and/or Utility Payments
Description	Time- limited housing assistance designed to prevent homelessness and increase housing stability for a period of up to 21 weeks in any 52-week period. The amount of assistance varies per client depending on funds available, tenant need, and program guidelines. Rent and mortgage assistance payments must be reasonable and represent actual housing costs.
2013 Annual Allocation	\$245,578.00
National Objective	N/A
Priority Need(s) Addressed	<ul style="list-style-type: none"> • Priority #7: Provide housing assistance for persons with HIV/AIDS
Target Areas	MSA
Performance Indicator	Households
Annual Goal	275
Method of Distribution	Sponsors will be selected for funding through a Request for Proposals. Proposals will be evaluated by a Review Committee comprised of MDHA staff, representatives of programs that serve persons living with HIV/AIDS, or individuals that are knowledgeable about various aspects of housing services. Proposals will be evaluated in accordance with the evaluation criteria contained in the RFP and ranked from highest to lowest. Funding will be awarded for projects according to their overall rank until funding is exhausted.

Funding Source	HOPWA
Activity	Rent Subsidies
Description	Project tenant-based rental assistance, including assistance for shared housing arrangements.
2013 Annual Allocation	\$147,854.00
National Objective	N/A
Priority Need(s) Addressed	<ul style="list-style-type: none"> • Priority #7: Provide housing assistance for persons with HIV/AIDS
Target Areas	MSA
Performance Indicator	Households
Annual Goal	35
Method of Distribution	Sponsors will be selected for funding through a Request for Proposals. Proposals will be evaluated by a Review Committee comprised of MDHA staff, representatives of programs that serve persons living with HIV/AIDS, or individuals that are knowledgeable about various aspects of housing services. Proposals will be evaluated in accordance with the evaluation criteria contained in the RFP and ranked from highest to lowest. Funding will be awarded for projects according to their overall rank until funding is exhausted.

AP-50 Geographic Distribution

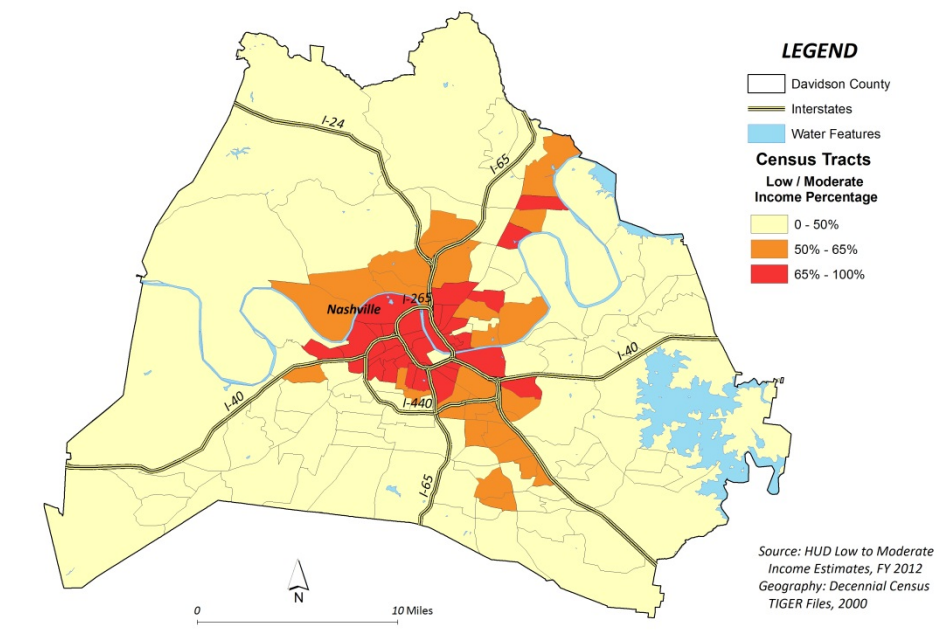
Under the tiered Placed-Based Strategy, approximately 35% of CDBG funds will be targeted to these areas. More specifically, 13% of CDBG funds will be targeted to Tier I Areas and an additional 22% will be targeted the Tier I Priority Neighborhood (North Nashville).

- **Tier I Areas**

Tier I areas are census tracts where at least 65% of households are at or below 80% AMI, as indicated in red on the map below. The following programs will be available in Tier I areas:

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

DAVIDSON COUNTY, TENNESSEE



- **Tier II Priority Neighborhoods**

MDHA, with the support of HUD-approved technical assistance providers, undertook a data-driven analysis in order to identify which neighborhood(s) in Davidson County should be targeted for concentrated place-based investment activities. See Appendix D for more information on the methodology. From this analysis, the North Nashville subarea (as identified on the map below) was selected as the first Tier II Priority Neighborhood.



Source: Metropolitan Planning Department

In addition to the programs available to Tier I areas, the following programs will be available:

- Acquisition, Clearance and Demolition, Relocation, and Clean-up
- Infrastructure Development (Commercial)
- Infrastructure Improvements (Residential areas)
- Targeted Housing Rehab (Homeowner and Rental).

To help develop a strategy for implementing these programs and ensure community involvement, MDHA will issue a planning grant to a nonprofit organization that will be selected through a competitive process. Programs and redevelopment strategies shall be consistent with the North Nashville Community Plan as approved by the Metropolitan Planning Commission.

Other Geographic Priorities

An additional need based upon geographic limitations includes the addressing and expansion of homeless and special needs assistance. Most of these resources are currently centrally located in the downtown, or urban core, area of the county. Continued efforts will be undertaken to ensure that these services are provided throughout the whole of the MDHA service area that will provide housing integration between transitional housing and permanent housing in the homeless and special needs populations.

The only program that is administered by MDHA that would lend itself to providing services to

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

AP-55 Affordable Housing

Introduction:

Scarcity of affordable rental units was an impediment identified in the Analysis of Impediments to Fair Housing Choice and was a common thread among all discussions during the planning period. The greatest need is among households with very low incomes, persons with disabilities, and families. As a result, affordable housing programs are designed to address these needs.

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

One Year Goals for the Number of Households to be Supported	
Homeless	297
Non-Homeless	220
Special Needs	310
Total	827

One Year Goals for the Number of Households Supported Through	
Rental Assistance	607
Production of New Units	25
Rehab of Existing Units	183
Acquisition of Existing Units	12
Total	827

Discussion:

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

- **Homeowner Rehab:** Due to excessive demand for assistance, priority will be given to homeowners whose incomes are at or below 50%, persons with disabilities, and the elderly (age 62+).
 - Assistance provided with CDBG funding will be limited to the following: heat/air, roof repair, plumbing, electrical, and accessibility. Assistance will be in the form of a grant. A portion of funds will be reserved to targeted rehab in Tier II Priority Neighborhoods.
 - Assistance provided with HOME funding will involve large-scale rehabilitation or reconstruction and must meet Housing Quality Standards. Assistance will be in the form of a no interest loan that will be forgiven on a pro rata basis for a specified period of time as long as the owner occupies the property.
- **Rental Rehab:**
 - Assistance will be provided to landlords and developers (including CHDOs) to rehabilitate substandard rental property to correct code violations. Assistance will be in the form of 3% loan, repayable over the affordability period. All loans will be subject to underwriting review by MDHA staff. Units must be occupied by tenants with incomes at or below 60% AMI. In projects with 5 or more HOME-assisted units, at least 20% of the units must serve households at or below 50% AMI. A portion of CDBG funds will be reserved to targeted rehab in Tier II Priority Neighborhoods.
- **New Construction:** During the Program Year, MDHA will make available funding opportunities for or elect to undertake development of affordable housing for rent or homeownership. Financial assistance may be in the form of predevelopment loans, construction loans, and permanent financing. Eligible uses of funds may include acquisition, site preparation, construction, and soft costs. New construction projects must meet HOME Site and Neighborhood Standards. All projects are subject to underwriting by MDHA.
 - **Rental Projects:** All rental projects must serve households with incomes at or below 60% AMI. In projects with 5 or more units, at least 20% of the units must serve households with incomes at or below 50% AMI. As indicated in the Annual Goals and Objectives for HOME, priority is established for projects serving households at or below 30% AMI and large families.
 - **Homeownership:** Homes must be sold to households with incomes at or below 80% AMI. However, if homes are not sold within 6 months of completion, the home must be rented to a household at or below 80% AMI.
- **Acquisition:** MDHA may utilize CDBG funds to acquire property in a designated Tier II Priority Neighborhood for affordable housing as part of a place-based strategy.

- **Downpayment Assistance:** Financial assistance may be made available to first-time homebuyers of the purchase of the home. Household income must not exceed 80% AMI, and recipients must complete housing counseling.
- **Rental Assistance:** Rental assistance is available through the HOPWA program and ESG Rapid-Rehousing program. First-month's rent payments will be made available through CDBG for homeless individuals/families that find housing through the Section 8 preference and/or VASH as part of the 100,000 Homes Campaign.

APPENDIX A-Citizen Comments

Below is a summary of comments received during the public hearing held on July 23, 2013 and MDHA's responses. No written comments were submitted.

Comment: Where does the data for the census blocks/tracts you are using originate? Is it correct and current? I think some census tracts that are showing up as low/mod are no longer low/mod.

Response: The census tract configurations are based on 2010 Census Data. Block group data is not yet available.

Comment: Which budget tables will you adhere to for the program line items? Can they be adjusted?

Response: MDHA will use the detailed line items table from the substantial amendment. There may be some ability for slight adjustments within line items. However, any large shifts in funding line items would require an amendment.

Comment: I like the idea of the place based programs, but I am concerned that some census tracts that are shown have already gentrified.

Response: These programs still must meet National LMI Objectives.

Comment: I also like the nonprofit capacity idea, but I wish there were more funds allocated to it this program year.

Response: There will be another planning grant available for a nonprofit as part of the Place-Based Strategy.

Comment: I am pleased to see the increases to CDBG and HOME funding.

Response: That was a nice surprise.

Comment: I like the ideas in the Tier I & II priorities, but I foresee administration problems by having acquisition, clearance/demolition, and relocation as separate line items. I

would suggest either one or two allocations instead of 4. Although the total allocation of \$260,000 seems reasonable, the smallish amounts allocated for each sub activity could make the use of these limited funds problematic from a programmatic perspective. It's just not enough to do anything meaningful and in some instances not even enough to do a small project. The limited amount certainly would result in far less impact. The other issue of concern is the administrative issues and costs involved in managing such small buckets of funds and the resulting need to do a plan amendment to move more than 25%; it seems very inefficient.

Response: Each is its own activity, so it has its own budget. If, during the program year, it appears this budget does not program, we'll make the necessary adjustments.

Comment: I think we need to clarify the 501(c)(3) requirement or not for the nonprofit capacity building program as it is worded in the amendment.

Response: This comment was accepted, and the 501(c)(3) requirement for this activity was removed. See page 43.

Comment: Is there still a portion of HOME funds designated for CHDOs?

Response: Yes. At least 15% of the annual allocation is set aside for CHDOs.

Comment: What will the amounts be and the interest rates for the Façade Loans?

Response: We are finalizing the policies and procedures and underwriting criteria. We are proposing some 0% loan options with varying repayment terms depending on the amount of the loan and forgivable grants if an applicant provides matching funds.

Comment: Is the Façade Loan program still a 50/50 match?

Response: Yes, it has been proposed as a dollar:dollar or 50/50 match for the forgivable grant.

Comment: The Tier I nonprofit capacity building program – what types of projects will be included?

Response: MDHA will not be funding projects directly. The program is to help nonprofits prepare and increase their internal capacity to undertake revitalization activities in their areas. They will be guided by other nonprofits.

Comment: Would this include neighborhood groups?

Response: Yes.

Comment: Please give an example of how the nonprofit capacity building will work.

Response: MDHA will issue an RFP for established nonprofits. The selected nonprofit will be awarded a contract to guide and help other nonprofits build their capacity.

Comment: Any numbers on how many nonprofits will be assisted?

Response: It will depend on the proposals and plans received. The projected goal is 2, but it could be higher.

Comment: Do you define nonprofits as 501(c)(3) or are neighborhood HOAs etc., eligible for assistance?

Response: The contract for provided guidance will need to go to a 501(c)(3) nonprofits. However, the organizations receiving assistance do not need 501(c)(3) status.

Comment: Considering the budget for this program, how many awards will there be?

Response: One nonprofit will be awarded the contract for undertaking this program. The number of those assisted will depend on proposed plans, etc.

APPENDIX B-Citizen Participation Plan

The Citizen Participation Plan has been deleted in its entirety and replaced with the following:

Introduction

The Citizen Participation Plan is designed to provide for and encourage citizen involvement in the development, implementation and evaluation of housing and community development programs in Metropolitan Nashville-Davidson County, Tennessee. While the processes contained in this Citizen Participation Plan may be used to address a broad range of public and private resources, this Plan is specifically designed to meet the citizen participation requirements for the Consolidated Plan for housing and community development needs of Metropolitan Nashville-Davidson County. Completion of the Consolidated Plan is required by the U.S. Department of Housing and Urban Development in order for Metropolitan Nashville-Davidson County to receive federal funds allocated through the Community Development Block Grant (CDBG), the HOME Investment Partnerships Program (HOME), the Emergency Solutions Grant (ESG), and the Housing Opportunities for Persons with AIDS (HOPWA) Program.

As the lead agency responsible for the preparation and administration of the Consolidated Plan, the Metropolitan Development and Housing Agency (MDHA) has the primary responsibility for developing and implementing the Citizen Participation Plan. Per the federal regulations found at 24 CFR 91, the citizen participation plan must provide for and encourage citizens to participate in the development of the Consolidated Plan, the annual action plan, any substantial amendments to the Consolidated Plan, and the annual performance report. The plan is designed especially to encourage participation by low- and moderate-income persons, particularly:

- those living in slum and blighted areas,
- in areas where CDBG funds are proposed to be used,
- residents of predominantly low- and moderate-income neighborhoods,
- residents of public and assisted housing developments, and
- residents of targeted revitalization areas in which the developments are located.

MDHA will follow its citizen participation plan to the greatest extent possible. The requirements for citizen participation do not restrict the responsibility or authority of MDHA for the development and execution of its Consolidated Plan. MDHA will provide citizens with a reasonable opportunity to comment on amendments to the citizen participation plan and will make the citizen participation plan public. The citizen participation plan must be in a format accessible to persons with disabilities, upon request.

The Community Development Department of MDHA is the point of contact for all questions, comments, complaints, and requests for technical assistance. The Community Development Department can be contacted by telephone at 615-252-8505 or by e-mail at comments@nashville-mdha.org. Please address all correspondence to:

MDHA Development Department
Attn: Consolidated Plan
P.O. Box 846
Nashville, TN 37202

MDHA will maintain a mailing list to keep interested parties informed with updates regarding the Consolidated Plan. To be added to the mailing list call 615-252-8505.

The Consolidated Plan & Annual Action Plan

Every five years MDHA develops a long-term strategic plan called the Consolidated Plan. The Consolidated Plan guides the programs that MDHA will undertake each year. In addition to the Consolidated Plan, MDHA must prepare an annual action plan that describes the actions to be taken in a specific program year. To ensure public participation in the development of the Consolidated Plan and annual action plan, MDHA will hold a public hearing, accept public comment, and issue public notices for the Consolidated Plan and for each annual action plan.

- **Public Notice & Publication**

MDHA will publish a public notice in a non-legal section of *The Tennessean* and at least one weekly minority newspaper prior to the beginning of the public comment period and a minimum of two weeks before a public hearing. MDHA will also publish a notice on its website. The notice will include a general summary and the location where copies of the entire plan may be obtained. MDHA will also send the notice to all members of the Consolidated Plan mailing list. Notices will also be distributed to all active affordable housing forums/groups, public housing Resident Associations, HUD gaps group and other homeless advocacy groups, and interested parties and groups.

MDHA is required to publish each proposed plan in a manner that affords citizens, public agencies, and other interested parties a reasonable opportunity to examine its contents and to submit comments. MDHA will provide a reasonable number of free copies of the plan to citizens and groups that request it. The Consolidated Plan will be provided in alternate formats. Copies of each plan will be available for review at MDHA and on the MDHA website at: www.nashville-mdha.org/consolidated_plan.php.

- **Public Hearings**

MDHA will hold at least one public hearing per year during the development of the Annual Action plan. The purpose of the public hearing is to obtain citizens' views, respond to proposals, and answer questions. The hearings will address housing and community development needs, proposed activities, and review of program performance. These hearings are held while the proposed plan is published for comment.

Upon request, MDHA will provide for translation services to meet the needs of non-English speaking residents. MDHA will also take whatever actions are appropriate to serve the needs of persons with disabilities.

- **Public Comments**

MDHA will provide a period of at least 30 days to receive comments from citizens on each proposed plan. MDHA will consider any comments or views of citizens received orally at the public hearings or in writing during the public comment period, in preparing the final adopted plan. A summary of these comments or views and MDHA's responses shall be attached to the final adopted plan.

Plan Amendments

In the course of administering the four federal programs, MDHA may need to amend the Consolidated Plan or an annual action plan. When the amendment is significant and meets the criteria set forth below, the change will be considered a substantial amendment and MDHA will undertake additional actions to ensure citizens have an opportunity to comment. Records of all amendments will be maintained at MDHA for public review and will be fully described in the annual performance report submitted to HUD.

- **Criteria for Substantial Amendments**

If a plan amendment meets any of the following criteria, MDHA will consider the amendment to be substantial and undertake the additional steps described in this section to ensure public participation:

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

- **Public Notice & Publication**

In the case of any proposed substantial amendment, MDHA will publish a public notice in *The Tennessean* and at least one weekly minority newspaper a prior to the beginning of the public comment period and a minimum of two weeks before a public hearing. The notice will include a summary of the amendment and a list of the locations where copies of the amendment may be examined. MDHA will also maintain a mailing list of interested parties and send information regarding the amendment to all members of the mailing list.

- **Public Comments**

MDHA will provide a period of at least 30 days to receive comments from citizens on each proposed plan. MDHA will consider any comments or views of citizens received orally at the public hearings or in writing during the public comment period, in preparing the final adopted plan. A summary of these comments or views and MDHA's responses shall be attached to the final adopted plan.

Performance Reports

Each year MDHA must submit a Consolidated Annual Performance and Evaluation Report (CAPER) to HUD. This report is due 90 days after the close of the program year. To ensure public participation in the review of the performance report, MDHA will hold a public hearing, accept public comment, and issue public notices.

- **Public Notice & Publication**

MDHA will publish a public notice in *The Tennessean* and at least one weekly minority newspaper prior to the beginning of the public comment period and a minimum of two weeks before a hearing. MDHA will also maintain a mailing list of interested parties and send information to all members of the mailing list. MDHA will provide a reasonable number of free copies of the performance report to

citizens and groups that request it. Copies of each report will be available for review at MDHA and on the MDHA website at: www.nashville-mdha.org/consolidated_plan.php.

- **Public Hearings**

MDHA will hold at least one public hearing per year during the preparation of the annual report. The purpose of the public hearing is to obtain citizens' views, answer questions, address housing and community development needs, and review program performance.

Upon request, MDHA will provide for translation services to meet the needs of non-English speaking residents. MDHA will also take whatever actions are appropriate to serve the needs of persons with disabilities.

- **Public Comments**

MDHA will provide a period of at least 15 days to receive comments on the annual report before the report is submitted to HUD. MDHA will consider any comments or views of citizens received orally at public hearings or in writing during the public comment period, when preparing the final report. MDHA will attach a summary of these comments and MDHA's response to the final annual report.

Information

In addition to providing participation in the development of plans and the review of the annual report, MDHA will provide citizens, public agencies, and other interested parties with reasonable and timely access to information and records relating to the Consolidated Plan and the use of federal funds. MDHA will provide access to records for the current program year and previous five program years. This information includes, but is not limited to, the citizen participation plan, the Consolidated Plan as adopted, annual action plans, performance reports, and any substantial amendments. MDHA will make these records available in a form accessible to persons with disabilities, upon request. Most records are maintained at MDHA in the Community Development Department, located at 712 South Sixth Street.

Records may be reviewed by appointment during regular business hours.

MDHA will also provide citizens with reasonable and timely access to local meetings held in regard to the Consolidated Plan and the activities undertaken as part of the Consolidated Plan.

Technical Assistance

MDHA must provide for technical assistance to groups representative of persons of low- and moderate-income that request such assistance in developing proposals for funding assistance under any of the programs covered by the Consolidated Plan. To request technical assistance, contact the Community Development Department using the contact information listed in the Introduction. MDHA hosts pre-proposal conferences when an Request for Proposal is issued to award funding for a project. The purpose of the pre-proposal conference is to answer questions from potential respondents.

Complaints

MDHA will maintain a file that documents all citizen complaints and MDHA's response for any complaints related to the Consolidated Plan, amendments, and performance report. MDHA will provide a substantive written response to every written citizen complaint within 15 working days of the receipt of the complaint. In addition, MDHA will consider these complaints when evaluating program performance as part of the annual report to HUD. Address all complaints to the Community Development Department address given in the Introduction.

Displacement

Displacement occurs when an individual, family, partnership, association, corporation, or organization moves from their home, business, or farm, or moves their personal property as a direct result of a federally-funded acquisition, demolition or rehabilitation. Generally, displacement does not include persons displaced temporarily from their dwelling for less than 12 months while it is being rehabilitated. Displaced persons and entities are eligible for relocation assistance under federal law.

As a part of this plan, MDHA is required to describe its plans to minimize displacement of persons and to specify the types and levels of assistance MDHA will make available to persons displaced. To minimize displacement, MDHA will avoid the acquisition and demolition of occupied structures. When displacement is necessary and unavoidable, MDHA will offer the following types of assistance.

For Residential Displacements

- Provide relocation advisory services to displaced tenants and owner occupants
- Provide a minimum 90 days written notice to vacate prior to requiring possession
- Reimburse for moving expenses
- Provide payments for the added cost of renting or purchasing comparable replacement housing.

For Nonresidential Displacements (businesses, farms, and nonprofit organizations)

- Provide relocation advisory services
- Provide a minimum 90 days written notice to vacate prior to requiring possession
- Reimburse for moving and re-establishment.

APPENDIX C-Fair Housing Narrative

While many aspects of Nashville-Davidson County's planned fair housing activities appear elsewhere in the Annual Action Plan or in other related documents such as the Analysis of Impediments to Fair Housing Choice, this portion of the Amended 2013 Annual Action Plan consolidates fair housing information and documentation in one place for ease of reference and review.

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.

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.

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 listed in the table below:

IMPEDIMENT	STRATEGY
1. Scarcity of Affordable Rental Units	Increase the supply of affordable rental units.
2. Scarcity of Affordable Housing Units Accessible to People with Disabilities	Increase the supply of housing units for people with disabilities.
3. Lack of Fair Housing Education, Testing and Enforcement Capacity	Increase fair housing education and build capacity for testing and enforcement of fair housing law.
4. Uneven Distribution of Community Resources	Support improved access to community resources.
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 staff will take the lead in developing an incentive program that encourages private-sector developers to include affordable units in their projects and advocate for the adoption of the program by Metro government.
- 1d)** 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.

Support improved Access to Community Resources

- 4a)** MDHA will routinely review Metro, MTA, and MNPS studies and planning documents (such as the Comprehensive Plan and the Nashville Strategic Transit Master Plan) for opportunities to advocate 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.

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.

**2013 ANNUAL ACTION
PROPOSED FAIR HOUSING ACTIVITIES**

Impediment	Affected Group(s)	Activity
1) Scarcity of Affordable Rental Units	Race/color, National Origin, Religion, Sex, Familial Status, Disability	1a) MDHA has allocated the following amounts to produce targeted rental units for the 2013 program year: HOME: \$2,612,016.15 for New Construction and Rehab of Rental Housing. During FY 2013 MDHA will issue RFPs to Developers; complete environmental review process; award funds for developers to start permitting and construction. MDHA may elect to undertake development as well.
Estimated Staff Hours Required		1040
Performance Indicator		Activities listed above and units upon completion in a later program year. These activities will produce the following targeted units at completion: 35 Total units; 10 @ <30% AMI; 2 Family units; 6 @ 31 – 50% AMI; 2 Family units; 19 @ 50 – 60% AMI; 2 Family Units.
Responsible Entity/Method of Distribution		MDHA, CHDOs, Developers – all funding to CHDOs and Developers awarded through RFP process.

Impediment	Affected Group(s)	Activity
1) Scarcity of Affordable Rental Units	Race/color, National Origin, Religion, Sex, Familial Status, Disability	1b) MDHA will continually research and explore avenues that may become available through public and private sources to be utilized to expand the supply of subsidized existing units for low income households.
Estimated Staff Hours Required		32
Timetable		Ongoing
Responsible Entity		MDHA

Impediment	Affected Group(s)	Activity
1) Scarcity of Affordable Rental Units	Race/color, National Origin, Religion, Sex, Familial Status, Disability	1c) After the 2010 flood, Metro Nashville formulated a Long-Term Recovery Plan that called for creation of an Applied Housing Research, Policy and Plan Partnership to develop a Housing Report and Action Plan to study current and future housing issues. This plan is still evolving but once finalized it will identify housing opportunities within the context of overall housing market conditions from different market perspectives, identify policy implications, and present policy options for consideration by Metro Nashville Government that will align housing initiatives and programs with existing and anticipated housing market conditions post flood. One of the things being reviewed in this study is incentives for private developers to include affordable units in their projects. MDHA staff is currently monitoring the progress of this study and will advocate for the adoption of any policies that will require/encourage private developers consider developing mixed income housing.
Estimated Staff Hours Required		80
Timetable		Ongoing
Responsible Entity		MDHA, Metro Nashville Government, The Housing Fund, Vanderbilt University.

Impediment	Affected Group(s)	Activity
1) Scarcity of Affordable Rental Units	Race/color, National Origin, Religion, Sex, Familial Status, Disability	1d) MDHA will adopt a policy to provide a 1:1 replacement of any affordable housing demolished or otherwise removed from MDHA's inventory and that the replacement is to provide a comparable housing opportunity, but may not necessarily be a physical housing unit.
Estimated Staff Hours Required		40
Timetable		2013 Program Year
Responsible Entity		MDHA.

Impediment	Affected Group(s)	Activity
2) Scarcity of Affordable Housing Units Accessible to People with Disabilities	Disability	2a) MDHA will adopt a policy requiring a percentage of units in each MDHA newly-funded development be designed for accessibility by people with physical and/or mental disabilities (even when federal law exempts such units from accessibility requirements) and implement a 1:1 replacement standard for any housing lost from the Agency's inventory of accessible units.
Estimated Staff Hours Required		40
Timetable		2013 Program Year
Responsible Entity		MDHA

Impediment	Affected Group(s)	Activity
2) Scarcity of Affordable Housing Units Accessible to People with Disabilities	Disability	2b) When contemplating the re-designation, redevelopment, or renovation of properties in the future, MDHA will develop a housing strategy in concert with stakeholders and advocates representing affected populations to ensure the displaced residents are provided appropriate housing opportunities. MDHA may count toward its accessible unit requirements units owned by other entities but funded by MDHA.
Estimated Staff Hours Required		160
Timetable		2013 Program Year
Responsible Entity		MDHA

Impediment	Affected Group(s)	Activity
2) Scarcity of Affordable Housing Units Accessible to People with Disabilities	Disability	2c) Require any single-family housing built or financed by MDHA incorporate universal design/visitability standards. In the course of construction, MDHA will inspect all units it builds or finances and ensure strict compliance with building codes, particularly with respect to accessibility.
\$ for Activity		HOME: \$250,000 New Construction - Homeowners
Estimated Staff Hours Required		40
Timetable		2013 and ongoing
Performance Indicator		Units
Annual Goal		2
Responsible Entity/Method of Distribution		MDHA, CHDOs, Developers – all funding to CHDOs and Developers awarded through RFP process.

Impediment	Affected Group(s)	Activity
2) Scarcity of Affordable Housing Units Accessible to People with Disabilities	Disability	2d) Metro Nashville will continue to 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.
Estimated Staff Hours Required		0 Additional
Timetable		2013 and ongoing
Responsible Entity		Metro Codes

Impediment	Affected Group(s)	Activity
3) Lack of Fair Housing Education, Testing, and Enforcement Capacity	Race/color National Origin Religion Sex Familiar Status Disability	3a) MDHA has allocated \$75,000 from the 2013 Program Year 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 and to launch and sustain a robust public interest ad campaign to increase the public's awareness of housing discrimination; the process for filing a complaint; and increase opportunities for representation of victims of discrimination in the pursuit of legal recourse.
Estimated Staff Hours Required		1000
Timetable		Initial RFP will be issued in 2013
Performance Indicator		Persons
Annual Goal		200
Responsible Entity/Method of Distribution		MDHA and Fair Housing Partner – funds to be distributed through RFP Process for qualified entity to provide services

Impediment	Affected Group(s)	Activity
3) Lack of Fair Housing Education, Testing, and Enforcement Capacity	Race/color National Origin Religion Sex Familiar Status Disability	3b) MDHA will convene a meeting with representatives of the area's fair housing organizations to discuss ways to work toward increased coordination and to prepare a written plan outlining the goals and responsibilities of each organization in fair housing education, testing, and enforcement.
Estimated Staff Hours Required		160
Timetable		2013 and ongoing
Responsible Entity		MDHA and Fair Housing Partners.

Impediment	Affected Group(s)	Activity
3) Lack of Fair Housing Education, Testing, and Enforcement Capacity	Race/color National Origin Religion Sex Familiar Status Disability	3c) MDHA will sponsor specific education opportunities on Fair Housing Act compliance for landlords, builders, real estate agents, MDHA and Metro staff, and the public at large, making periodic training participation mandatory for Agency staff and entities contracting with the Agency.
Estimated Staff Hours Required		160
Timetable		2013 and ongoing
Responsible Entity		MDHA with assistance from Fair Housing Partners

Impediment	Affected Group(s)	Activity
4) Uneven Distribution of Community Resources	Race/color National Origin Religion Sex Familiar Status Disability	4a) MDHA will routinely review Metro, MTA, and MNPS studies and planning documents (such as the Comprehensive Plan and the Nashville Strategic Transit Master Plan) for opportunities to advocate public infrastructure improvements that align with the goal of expanding housing choice.
Estimated Staff Hours Required		48
Timetable		2013 and ongoing
Responsible Entity		MDHA.

Impediment	Affected Group(s)	Activity
4) Uneven Distribution of Community Resources	Race/color National Origin Religion Sex Familiar Status Disability	4b) MDHA will institute a point system to be utilized as a scoring factor evaluating responses to RFPs 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..
Estimated Staff Hours Required		40
Timetable		2013 and ongoing
Responsible Entity		MDHA.

Impediment	Affected Group(s)	Activity
4) Uneven Distribution of Community Resources	Race/color National Origin Religion Sex Familiar Status Disability	4c) MDHA will institute a point system to be utilized as a scoring factor in evaluating response to RFPs that will higher points for developers proposing projects located outside areas with high poverty and minority concentration to encourage affordable housing development in a variety of neighborhoods throughout Metro Nashville.
Estimated Staff Hours Required		40
Timetable		2013 and ongoing
Responsible Entity		MDHA, CHDOs, Developers.

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

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

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

APPENDIX D-Methodology for Determining Tier II Priority Neighborhoods

The methodology employed for selecting Tier II Priority Neighborhoods involved comparing eligible census tracts in Davidson County against several housing, economic, low-income, and health indicators. For each indicator, a weight was assigned (either 1 or 0.5) according to how strongly each metric correlated with eligible program funding. A table listing the indicators and weights is included below:

Indicator:	Weight Assigned:
Vacancy (Housing)	1
Percent Cost Burdened: Owners and Renters (Housing)	1
Unemployment Rate (Economic)	1
Mean Travel Time to Work (Economic)	0.5
Percent Working Age Residents (Economic)	0.5
Educational Attainment (Economic)	0.5
Median Household Income (Low-Income)	0.5
Poverty Rate (Low Income)	1
Food Deserts (Health)	0.5

The rationale for weighting certain indicators higher than others was driven by 1.) Correlating certain community needs with eligible program activities 2.) Statistical validity. The vacancy and percent cost burdened metrics were both weighted higher due to strong opportunities for housing investments as eligible funding programs (i.e. Acquisition, Demo, Clearance, and Relocation, Rehab). The unemployment rate and poverty rate were assigned higher weights because they are generally strong indicators of economic development needs in a community.

The other indicators used were seen as important pieces in determining overall level of disinvestment in a community but did not directly correlate to eligible program funding and were therefore given lower weights in the analysis. However, the food desert indicator, despite being a high priority, was given a lower weight due to the indicator being a binary metric (an area is either in a food desert or not). A lower weight was assigned for the sake of statistical validity so that one metric wouldn't have a disproportionate influence on the summary value.

From these weighted indicators, a summary statistic was derived for each census tract. The following outlines the process for arriving at these summary statistics:

1. A Z-Score was calculated for all entries. A Z-Score provides a standard measurement of variation from the mean. This ensures that indicators with higher or lower averages do not disproportionately bias the summary value.

2. For Yes/No indicators, a value of 1 and 0 was used to calculate a Z-Score.
3. A Z-Score was averaged for each census tract across all indicators. In census tracts for which certain data was not available, that indicator was not included in the average calculation.
4. Because the average Z-Score value generated an odd range (-.64 to .952), the range was adjusted so that 1 represents the census tract in needing the least investment in the sample area and 10 represents the census tract needing the most investment.

Summary Value Calculation:

Z-Score

$$Z_1 = \frac{x - \mu}{\sigma}$$

Where:

Z_1 = Z score for indicator “1”

x = Original value

μ = Mean of population

σ = Standard deviation

Z-Score Weighted Average

$$S_1 = \frac{(Z_1 * W_1) + (Z_2 * W_2) \dots (Z_n * W_n)}{n}$$

Where:

S_1 = Weighted Average Z-Score for census tract “1”

W_1 = Weight assigned to indicator “1”

n = Number of indicators

Summary Value Adjustment

$$V_2 = V_1 + (l_1 * m)$$

Where:

V_2 = Summary value for census tract “2”

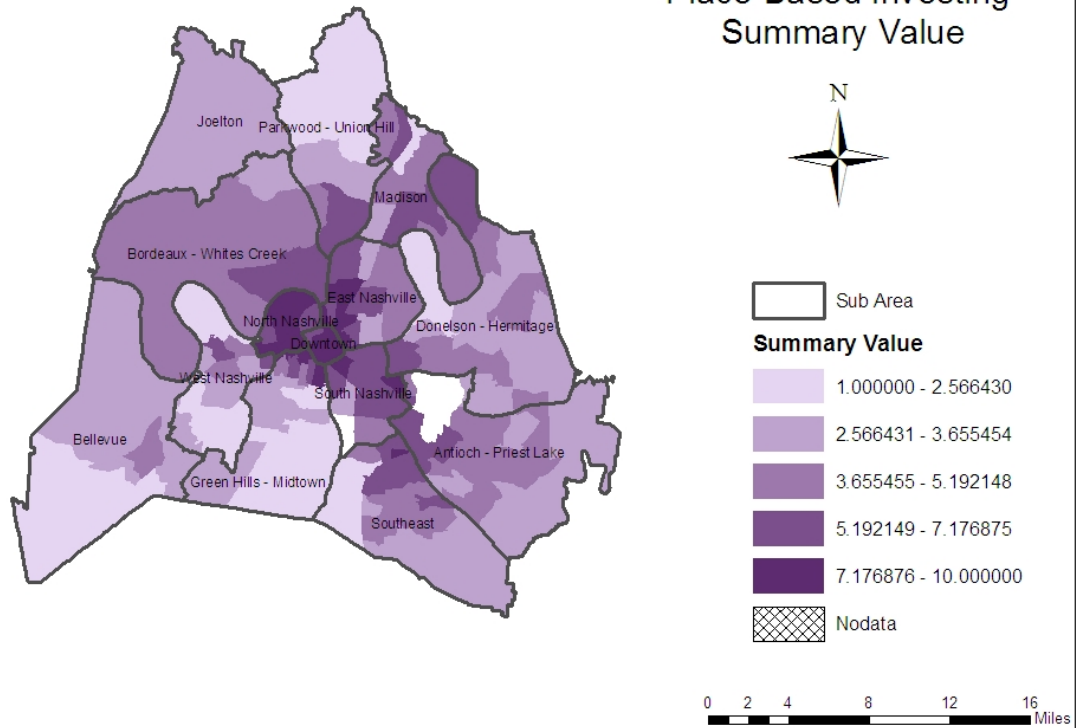
m = Ratio of the target data range to original data range

$l = S_{n+1} - S_n$

Once summary statistics were derived for each census tract, MDHA overlaid these census tracts with a layer of “subarea” designations employed by Metro Nashville’s Department of Planning. From this geographical analysis, the North Nashville subarea appeared to have the greatest concentration of high scoring census tracts and was therefore determined to be the first area targeted for place-based investment.

Davidson County

Place-Based Investing Summary Value



APPENDIX E-Budget Comparison

The following tables show the comparison of the 2013 estimated budget that was in the February 2013 Consolidated Plan and the revised budgets proposed in this Amendment. Activities that did not have budgets under 2013 Estimate are new activities proposed in this Amendment.

2013 Formula Allocations				
Program	2013 Estimated	2013 Actual	\$ Difference	% Difference
CDBG	\$ 4,262,373.00	\$ 4,694,678.00	\$ 432,305.00	10%
HOME	\$ 1,789,022.00	\$ 1,855,995.00	\$ 66,973.00	4%
ESG	\$ 390,383.00	\$ 310,953.00	\$ (79,430.00)	-20%
HOPWA	\$ 900,557.00	\$ 852,786.00	\$ (47,771.00)	-5%
TOTAL GRANTS	\$ 7,342,335.00	\$ 7,714,412.00	\$ 372,077.00	
Estimated Total Program Income	\$ 475,000.00	\$ 475,000.00	\$ -	
TOTAL ALL	\$ 7,817,335.00	\$ 8,189,412.00	\$ 372,077.00	

Activity	CDBG	
	2013 Estimate w/PI	2013 Actual w/Prior Year & PI
<i>PI Estimate</i>	\$ 230,000.00	\$ 250,000.00
<i>Prior Year</i>	\$ -	\$ 2,802,098.50
<i>Grant</i>	\$ 4,262,373.00	\$ 4,694,678.00
<i>TOTAL</i>	\$ 4,492,373.00	\$ 7,746,776.50
Acquisition, Demo, Clearance, & Relocation		
Acquisition	\$ 75,000.00	\$ 180,000.00
Disposition	\$ -	\$ 15,000.00
Clearance & Demo	\$ -	\$ 30,000.00
Relocation	\$ -	\$ 10,000.00
Clean-up	\$ -	\$ 25,000.00
TOTAL	\$ 75,000.00	\$ 260,000.00
Admin & Planning		
Admin & Planning (MDHA)	\$ 857,474.00	\$ 943,935.00
North Nashville Planning Grant		\$ 20,000.00
TOTAL	\$ 857,474.00	\$ 963,935.00
Economic Development		
Commercial Rehab	\$ 237,057.50	\$ 500,000.00
Infrastructure Development		\$ 250,000.00
Technical Assistance	\$ 100,000.00	\$ 100,000.00
Micro-Enterprise Assistance	\$ 115,000.00	\$ 115,000.00
Section 108 Loan Repayment	\$ 482,841.50	\$ 482,841.50
TOTAL	\$ 934,899.00	\$ 1,447,841.50
Housing		
H/O Rehab – ALL	\$ 1,125,000.00	\$ 1,475,000.00
Energy Efficiency Improvements	\$ -	\$ 250,000.00
Rental Rehab – ALL	\$ -	\$ 400,000.00
Rehab Program Delivery	\$ -	\$ 400,000.00
Housing Services	\$ -	\$ 25,000.00
TOTAL	\$ 1,125,000.00	\$ 2,550,000.00
Public Facilities & Infrastructure		
Homeless Facilities	\$ 1,000,000.00	\$ 1,000,000.00
Neighborhood Facilities	\$ -	\$ 300,000.00
Parks, Recreational Facilities	\$ -	\$ 500,000.00

Flood Drainage Improvements	\$	-		
Water/Sewer Improvements	\$	-		
Street Improvements	\$	-		
Sidewalks	\$	-		
TOTAL	\$	1,000,000.00	\$	1,800,000.00
Public Services				
Youth Services	\$	400,000.00	\$	400,000.00
Fair Housing Activities	\$	75,000.00	\$	75,000.00
Healthy Food Initiatives	\$	25,000.00	\$	25,000.00
Services for the Homeless			\$	200,000.00
TOTAL	\$	500,000.00	\$	700,000.00
Other				
Non-profit Capacity Building	\$	-	\$	25,000.00
TOTAL	\$	-	\$	25,000.00
TOTAL CDBG	\$	4,492,373.00	\$	7,746,776.50

HOME			
Activity	2013 Estimate w/PI		2013 Estimate w/Prior Year & PI
<i>PI Estimate</i>	\$	225,000.00	\$ 225,000.00
<i>Prior Year</i>	\$	-	\$ 1,291,620.15
<i>Grant</i>	\$	1,791,694.00	\$ 1,855,995.50
<i>Total</i>	\$	2,016,694.00	\$ 3,372,615.65
Acquisition	\$	52,000.00	<i>Funded with CDBG</i>
Admin	\$	179,694.00	\$ 208,099.00
DPA	\$	225,000.00	\$ 125,000.00
Homeowner Rehab	\$	175,000.00	\$ 100,000.00
New Construction- Homeowner	\$	250,000.00	\$ 250,000.00
New Construction-Rental	\$	300,000.00	\$ 1,000,000.00 <30% AMI
	\$	200,000.00	\$ 600,000.00 31-50% AMI
	\$	135,000.00	\$ 400,000.00 51-60% AMI
Rental Rehab	\$	500,000.00	\$ 689,516.15
TOTAL HOME	\$	2,016,694.00	\$ 3,372,615.15

ESG			
Activity	2013 Estimate		2013 Actual
Admin	\$	29,278.00	\$ 23,321.00
Emergency Shelter	\$	204,230.00	\$ 148,745.00
Street Outreach	\$	30,000.00	\$ 24,999.00
HMIS	\$	10,000.00	\$ 10,000.00
Rapid Re-housing	\$	116,875.00	\$ 103,888.00
TOTAL ESG	\$	390,383.00	\$ 310,953.00

HOPWA			
Activity	2013 Estimate		2013 Actual
Admin	\$	72,798.00	\$ 70,742.00
Supportive Services	\$	436,501.00	\$ 388,612.00
STRMU	\$	247,978.00	\$ 245,578.00
Rent Subsidies	\$	143,280.00	\$ 147,854.00
TOTAL HOPWA	\$	900,557.00	\$ 852,786.00