

METROPOLITAN NASHVILLE-DAVIDSON COUNTY, TENNESSEE

**2022-2023 ANNUAL UPDATE
FOR
PROGRAM YEAR FIVE
TO THE
2018-2023 CONSOLIDATED
PLAN
FOR
HOUSING AND COMMUNITY
DEVELOPMENT
For the period June 1, 2022 – May 31, 2023**

Prepared by:

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701 South Sixth Street
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On Behalf of:

The Metropolitan Government of
Nashville and Davidson County
Final May 18, 2022



The 2022-2023 Annual Update to the 2018-2023 Consolidated Plan

(2022 Action Plan) Program Year Five

Executive Summary **ES1**

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Executive Summary

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

1. Introduction

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

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

The current Five-Year Plan covers the period June 1, 2018, through May 31, 2023. The Plan is updated each year (Annual Update) to reflect proposed activities and goals for the program year (Action Plan). Annual Updates/Action Plans serve as Nashville's application for federal funds each year. This Action Plan is for Program Year (PY) 5 (2022) and covers the period June 1, 2022, through May 31, 2023, and allocates regular formula grants for CDBG, HOME, ESG and HOPWA to eligible projects/activities based on the goals and priorities established in the original Five-Year Plan.

MDHA received the notification from HUD for the PY 2022 formula grant allocations on May 18, 2022. Therefore, the activity budgets in this final Action Plan have been updated since the draft plan was released based on actual funding levels. In addition, approximately \$348,711 in CDBG program income is expected to be received during the 2022 PY and approximately \$160,678 in HOME program income is expected to be available to allocate to projects during the 2022 PY. Therefore, anticipated resources are as follows:

PROGRAM YEAR (PY) 5 ANTICIPATED RESOURCES			
Grant	2022 Annual Allocation	Estimated Program Income	Total
CDBG	\$ 5,073,448.00	\$348,711.00	\$ 5,422,159.00
ESG	\$ 455,738.00	\$ 0.00	\$ 455,738.00
HOME	\$ 2,705,439.00	\$160,678.00	\$ 2,866,117.00
HOPWA	\$ 2,165,642.00	\$ 0.00	\$2,165,642.00
TOTAL	\$ 10,400,267.00	\$509,389.00	\$ 10,909,656.00

The Annual Update is due to HUD forty-five (45) days prior to the beginning of the PY, which for Metro Nashville, is no later than April 14 of each year. However, MDHA cannot submit the Action Plan for HUD approval until the Plan has been approved by the MDHA Board of Commissioners and Metro Government Council. Therefore, a request for extension for submission of the final Action Plan to August 16, 2022, was approved by the HUD office on May 2, 2022. The final allocations for 2022 ESG and HOPWA activities – other than those directly undertaken by MDHA staff – will be determined via the Request for Application (RFA) process and demand for funding for projects, subject to regulatory caps.

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

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

Priorities of the Plan are to:

1. Increase the number of decent, safe affordable units and help low-and-moderate income households access affordable housing including increased access to housing/shelter for persons having special needs.

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

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

The table below summarizes the proposed activities funded during the 2022 PY to address Consolidated Plan priorities.

Priority 1	Increase the number of decent, safe affordable units and help LMI households access affordable housing including increased access to housing/shelter for persons having special needs.
Activity	New Construction
HOME	New Construction - Rental
HOME	New Construction – Owner
HOME	New Nonprofit Partner Set-aside
Activity	Increased access to housing/shelter for persons having special needs.
CDBG	Acquisition, Construction or Reconstruction, Rehabilitation or installation of public facilities and improvements
Activity	Address Housing Barriers
CDBG	Housing Services
CDBG	Fair Housing Activities
Priority 2	Preserve existing affordable housing units and help LMI tenants and homeowners retain housing.
Activity	Retain affordable housing stock
CDBG	Homeowner Rehabilitation (Housing Target Areas)

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

3. Evaluation of past performance

Each year, MDHA reports its progress in meeting the five-year and annual goals in the Consolidated Annual Performance and Evaluation Report (CAPER). This report is required to be submitted to HUD within 90 days after the PY ends. Previous years' CAPERs are available on MDHA's website: <https://bit.ly/MDHACommunityDevelopment>

MDHA has consistently satisfied program mandates and has successfully targeted funds to benefit low- and moderate-income persons and neighborhoods. In its most recent letter approving the 2021 CAPER, HUD determined that our overall progress is excellent and that activities appear to be in accordance with program requirements.

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

4. Summary of citizen participation process and consultation process

To ensure the 2022 Action Plan truly addresses the needs in Metro Nashville, the citizen participation and consultation processes were designed to garner considerable public input on the development of the Action Plan, as well as on the Draft. Throughout the 2021 PY, MDHA staff consulted with stakeholders, non-profits, project sponsors, and the Mayor's office for suggestions to improve or expand programs for PY 2022. Additional input on the development of the draft Plan was obtained through three virtual consultation sessions with local stakeholders and an on-line survey. Comments on the draft Action Plan were obtained during the 30-day public comment period (April 11 through May 13, 2022) and an in-person and virtual public hearing held via Zoom on April 28, 2022. Details about the public hearing and how the public can submit comments are provided in the Public Notice (Appendix D).

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

later than five (5) business days prior to any meeting. Public Notices are translated to Spanish.

Following the conclusion of the Public Comment Period, the 2022 Action Plan will be presented to the MDHA Board of Commissioners and the Metropolitan Council for approval, prior to its submittal to HUD.

5. Summary of public comments

A summary of comments received from stakeholders during the three consultation meetings and on-line surveys is provided in Appendix C.

A summary of public comments on the draft 2022-2023 Action Plan received at the virtual public hearing held on April 28, 2022, is provided in Appendix E.

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

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

7. Summary

Nashville is a growing city. Data from the 2020 Census, indicate the population of Davidson County, including all municipalities, was 715,884. With its' popularity has come immense pressure on the housing market, with cost burden being the most common housing problem experienced by Nashvillians of all income ranges. This problem is particularly acute for households with income less than 50% of the area median income (AMI). Further, Nashville's growth has not occurred equally across the county – the landscape of some neighborhoods has been changed dramatically by new development and the loss of affordable housing, while investment and new development have yet to make it to other areas. The goals and priorities of the Consolidated Plan seek to create new affordable housing, especially for households with incomes \leq 60% AMI and provide incentives for this development in areas of opportunity; to preserve existing affordable housing to stabilize the fabric of existing neighborhoods and allow homeowners to age in their homes; and to bring new investment to underserved areas.

The impact of COVID-19 and the 2020 storms had a detrimental effect on Metro Nashville's finances. Additionally, the storms resulted in damage and loss of the affordable housing inventory as investors came in and acquired and tore down housing that was part of the affordable inventory and replaced it with housing that is not affordable. The COVID-19 pandemic resulted in the need to provide resources for the homeless population to social distance to prevent the spread of the disease further exacerbated the need for additional affordable housing.

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

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

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

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

Table 1 – Responsible Agencies

Narrative

By Resolution R94-1326, the Metropolitan Council designated MDHA as the lead agency responsible for the development and administration of the Consolidated Plan and its related grant programs. These functions are undertaken by MDHA's Community Development Department.

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

1. Introduction

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

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

Throughout the 2021 PY, MDHA staff consulted with stakeholders, non-profits, project sponsors, Metro departments and the Mayor's office for suggestions to improve or expand programs for PY 2022. Additional input on the development of the draft Plan was obtained through three virtual consultation sessions with local stakeholders and an on-line survey. Comments on the draft Action Plan were obtained during the 30-day public comment period and at an in-person and virtual public hearing held during the comment period.

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

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

Public Housing Authority

MDHA is the public housing authority (PHA) in Metro Nashville and provides public/affordable housing through its Affordable Housing Department and rental assistance (i.e., Section 8 Vouchers) through the Rental Assistance Department and undertakes redevelopment of its properties through the Recapitalization Department. These functions are guided by the Five Year PHA Plan and are separate and distinct from the Community Development Department, which administers the Consolidated Plan and its related programs. Input on the needs of public/affordable housing residents and

voucher-holders and how to address these needs was obtained through consultation with the leadership from these MDHA departments. Further, department directors participate in weekly staff meetings with MDHA executive leadership to review projects and coordinate efforts.

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

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

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

In addition, a partnership between MDHA and MHID allows for the utilization of up to 18 housing choice vouchers per month to support housing people experiencing literal homelessness. The goal is to focus on the most vulnerable populations who have experienced or are at risk of chronic homelessness and offer permanent supportive housing. Since this partnership began in May 2013, over 1,388 people have received a voucher.

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

MHID participates in a local effort led by the Metro Health Department called the Community Mental Health Systems Improvement (CMHSI) collective impact. Formed in 2017, the CMHSI focuses on the most vulnerable people who experience behavioral health issues and who touch the health, mental health, criminal justice, and social sectors. The group's initial effort resulted in the establishment of a 30-bed Crisis Treatment Center, a program of the Mental Health Cooperative that offers 24/7 free Crisis Assessment and Treatment services for any individual in Davidson County. This facility offers a therapeutic alternative to Emergency Rooms for individuals in a psychiatric crisis and a diversion option for police officers so that, when appropriate, they can drop individuals off for treatment instead of booking them into jail for minor offenses.

In addition, CMHSI launched a Supportive Housing Task Force that is seeking to improve coordination between agencies that provide health, mental health, and substance abuse treatment services, especially as those agencies' clients are at risk of entering, or are already involved with, the criminal justice systems. The goal, like that of the wider CoC, is to ensure that people in need receive appropriate supportive housing. The Task Force understands that there is a dearth of supportive options available for people experiencing homelessness who have such severe and persistent mental health issues that they are unable to engage successfully and consistently with social workers and other service providers. The goal is to explore all funding and programmatic options, as well as to develop protocols to assist getting people who have been living on Nashville's streets for years off the streets and into permanent housing options. The CMHSI effort is focused on public private systems change to align resources and avoid duplicative efforts resulting in maximum benefit to clients.

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

The Nashville-Davidson County CoC and the Metropolitan Government strengthened CoC governance by creating a unified leadership structure. The CoC Homelessness Planning Council, which serves as the CoC's governing body, was formed in July 2018. This body has adopted a strategic 3-year plan to end homelessness, which will be updated in 2022, and will strive to access/leverage additional local resources and integrate them with available federal and state resources to end homelessness.

The CoC currently has 14 committees that work to fill gaps and address specific populations. In particular, a Veterans committee is working with Built for Zero to create a data-driven approach and further reduce the number of individuals on the Veterans By Name List. In 2016, a youth and young adult committee drafted the Key Action Plan to address youth homelessness. In July 2018, Nashville was one of 11 communities across the country to be awarded Youth Homelessness Demonstration Program (YHDP) funding, and regular CoC Youth/Young Adults Committee meetings have been attended by an array of stakeholders to utilize an initial YHDP award of \$3.54 million in conjunction with other leveraged sources to end homelessness among youth and young adults. The community has also implemented the Family Collaborative led by the United Way to address family homelessness and is integrating that work within the CoC's strategic framework.

Capitalizing on a huge influx of CARES Act HUD ESG-CV funds and tailored technical assistance, the city embarked on a Housing Surge designed to connect people sleeping

outdoors and in shelters with permanent housing and rental assistance. The Metro Homeless Impact Division (MHID) is holding bi-weekly online meetings with nonprofit providers that have designated housing search staff to coordinate local housing efforts and launch a landlord locator campaign called the Low Barrier Housing Collective. The MHID is developing a landlord incentive program that will be implemented in partnership with United Way and local funders. The goal is to use the coordinated entry process and reduce chronic and long-term homelessness with a Housing First approach. Results are unprecedented, and reflected in the graphic below, through April 4, 2022, showing persons moved into housing.

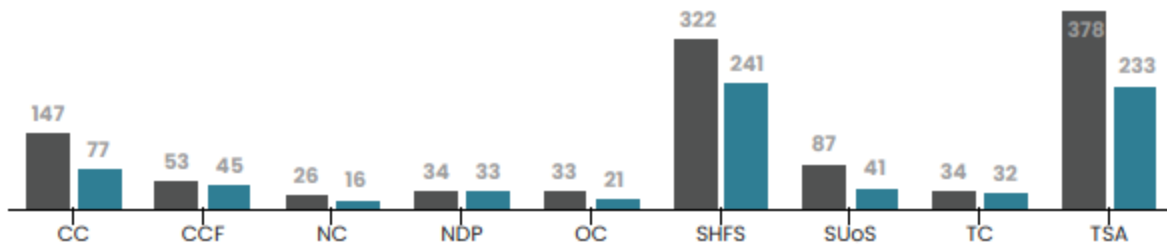
ESG-CV Rapid Rehousing: 4/4/22 Update

1096 clients

have been enrolled in ESG-CV and THDA ESG-CV rapid rehousing programs.

743 clients

have been housed.

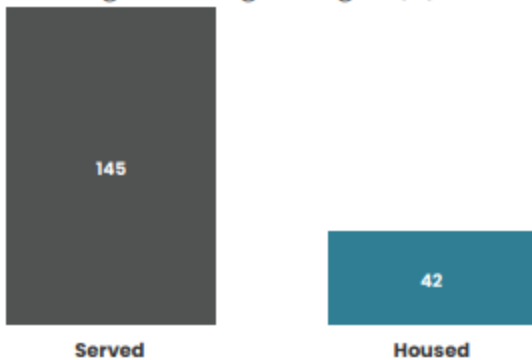


*total number of clients served by agencies exceeds the number of persons enrolled and housed, due to some clients being served at different times by multiple agencies



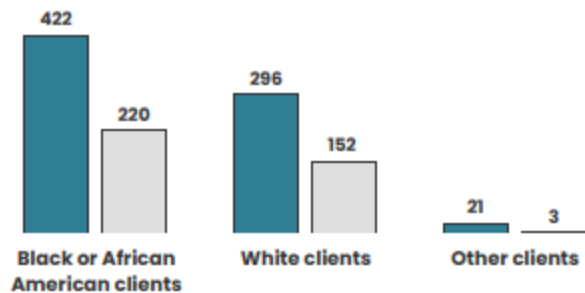
THDA ESG-CV: 10/1/21 - 04/4/22

THDA funding was added in late 2021 during their 3rd quarter. Four RRH agencies and two SO agencies began usage 10/1/21



Race Equity

66% of White clients enrolled in ESG-CV Rapid Rehousing programs have been permanently housed, and 66% of Black or African American enrolled clients have been permanently housed.



1096 people served

491 chronically homeless
29 veterans
77 youth under 25
555 in HH w/adults only
540 in HH w/children

743 people moved into housing

364 in HH w/adults only
379 HH w/children

average of 44 days enrollment -> housing

Less than a week: **272**
1-2 weeks: **29**
2-3 weeks: **39**
3-4 weeks: **50**
1-2 months: **158**
2-6 months: **168**
6-12 months: **29**
12 Months+: **1**
Exited w/no move-in: **58**



Length of Time Homeless

2-3 weeks: **6**
3-4 weeks: **2**
1-2 months: **49**
2-6 months: **186**
6 months-1 year: **135**
1-2 years: **120**
Over 2 years: 238
Data not collected: **10**
Not yet moved into housing: **350**

Program Exits: 73% Positive

Permanent destination: 255
Rental with RRH subsidy: **55**
Staying with family/friends permanently: **43**
Rental with RRH subsidy: **42**
Rental with HCV voucher: **40**
Rental in public housing unit: **44**
Homeless destination: 47
Temporary destination: 8
Jail: **14**
Deceased: **20**
Data not collected: **21**

Through Coordinated Entry (CE), the MHID brings together CoC providers who meet weekly in care coordination meetings for different populations. The meetings focus on families with children, individuals, youth/young adults and veterans, and examine the By Name Lists for each population. To be on a By Name List, households are literally homeless and have been assessed via the VI-SPDAT, the housing triage tool. Nashville is utilizing the VI-SPDAT for individuals, the Family-VI-SPDAT for families, and the TAY-VI-SPDAT for youth. At-risk populations will be identified by a preliminary common assessment through the HMIS prior to administering the VI-SPDAT. Nashville continues to evaluate the CE process with an equity lens and joins in national conversations about improving assessment tools that will reflect an equitable housing approach. MHID is awaiting the final report of its CE evaluation, which is going to be used as the starting point in determining a new assessment and prioritization process in the community.

Additionally, the CoC received a renewable grant to fund a CE intake coordinator to provide education to the community at large and engage any person who may be experiencing a housing crisis, who has yet to be connected to services. This CE position will complement the existing two CE positions at the MHID.

The community has an agreed-upon process to serve the most vulnerable people through a housing navigation process once they are assessed. The tools commonly utilized for the housing navigation process include annual bus passes that provide free rides to people experiencing, or at-risk of, chronic homelessness as they work on housing; access to SRO housing units at a local nonprofit provider; connection to available case management slots following a Critical Time Intervention (CTI) model; Rapid Re-housing units funded through CoC and ESG grant funds, and the partnership between MHID and MDHA that provides up to 18 housing choice vouchers each month for people experiencing literal homelessness. Housing navigators have access to move-in costs through a special fund administered by the MHID that pays up to \$1,000 per household for the first month's rent, utility deposits, security deposits, and if funding is available, other move-in costs including some arrears. MHID also uses CDBG funds for move-in cost payments (utility and security deposits as well as first month's rent) for people experiencing literal homelessness who have actively been working with housing navigators. Housing navigators are trained by the MHID staff and are required to utilize the CE to apply for move-in costs. Currently, approximately 45 provider organizations representing street outreach, emergency shelter, mental health care, AIDS/HIV services, youth/young adults, and other direct service providers participate in the housing navigation process. Housing navigators collaborate in monthly and weekly meetings to address the specific needs of people experiencing homelessness with a housing-focused approach.

An effort called Community Mental Health Systems Improvement (CMHSI) with the health department, mental health community organizations, hospital representatives, correctional facilities, and homeless services coordinators is underway to collaborate on how to streamline the intersection of these different sectors and improve services coordination among highly vulnerable populations in a housing crisis. The Davidson County Sheriff's Office opened a Behavioral Care Center to divert people with severe and persistent mental illness from the jail system. The Metro Homeless Impact Division is connecting with the Behavioral Care Center to link them to resources available to the CoC providers such as housing navigation tools, coordinated entry (CE) and resources accessed through CE.

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

In addition to administering the Consolidated Plan and its related programs (CDBG, HOME, HOPWA and ESG) for Metropolitan Nashville, MDHA currently serves as the CoC Collaborative Applicant. The Homeless Impact Division (MHID) is the HMIS Lead, manages the Coordinated Entry process, and serves as the backbone organization offering planning and coordination for the CoC. The CoC Homelessness Planning Council has created working committees attended by diverse representations of partner agencies. Several committees work to streamline performance standards across multiple funding sources. These efforts help create, revise and align the policies and procedures for Coordinated Entry, HMIS and the Performance Evaluation processes.

In efforts to further align ESG with CoC priorities, there has been increased coordination between the CoC and ESG performance standards. Two former CoC committees – the Coordinated Entry Committee and the Written Standards Committee – were combined into a Standards of Care committee to align policy efforts. This committee is charged with reviewing and continuously updating the Nashville-Davidson County CoC & ESG written standards. The last reiteration of the Nashville-Davidson County CoC & ESG Written Standards was adopted by the CoC Homelessness Planning Council in July 2021. MDHA incorporated those standards as a part of its ESG application process. In 2021, a member of the CoC's Performance Evaluation Committee (PEC) also served on the ESG Review Committee. Discussions are underway to potentially merge the PEC and ESG review committees to review proposed projects. Our community now coordinates the CoC and ESG evaluation committees, but efforts cannot be fully aligned due to the difference in timing of the federal funding announcements.

The HMIS Oversight Committee serves as the advisory body to the CoC and HMIS Lead. Its primary purpose is to provide guidance to the CoC and HMIS Lead on data planning; policy development; and systems improvement, including regular data quality review. In addition, the HMIS Oversight Committee ensures the administration of HMIS in accordance with HUD guidelines. The goals and duties of the HMIS Oversight Committee include:

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

In the late summer of 2020, the HMIS Oversight Committee presented documents to the CoC Homelessness Planning Council that allow all partners participating in HMIS to share client level data, thus, our CoC is now able to further increase coordination of services and strengthen the HMIS data quality. Additionally, MHID's HMIS Data Quality and Security Coordinator is working closely with the CoC Data Committee to outline and implement a data quality plan.

The MHID has successfully increased interdepartmental relationships within Metro government and moved the city's response to homelessness from an enforcement-only approach to an engagement-first approach, which is focused on linking people to needed services rather than arresting them for essentially being homeless. These efforts increase community outreach and education about streamlining processes and aligning funding to help more people.

While a lot of work has been done around the alignment of procedures, policies, and resources, the CoC's HMIS Oversight Committee, in coordination with MHID's HMIS team, continuously works with provider agencies to improve data quality, onboard new participating agencies, shape policies and procedures of HMIS, and implement data quality and privacy plans, etc. The HMIS Lead team is also implementing an educational push and, with the assistance from CoC committees and the Homelessness Planning Council, is actively encouraging street outreach workers to increase their efforts to enter people living outdoors into HMIS.

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

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

1	<p>Agency/Group/Organization</p> <p>Agency/Group/Organization Type</p> <p>What section of the Plan was addressed by Consultation?</p> <p>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>New Level CDC</p> <p>Housing</p> <p>Business Leaders</p> <p>Housing Needs Assessment</p> <p>Prior to drafting the 2022 Annual Action Plan, MDHA held three virtual stakeholder consultation sessions to receive their input on developing the Plan. The sessions covered the following topics: Homelessness and Housing for Persons with Aids; Affordable Housing and Affirmatively Furthering Fair Housing; and Non-Housing Community Development Needs. Further descriptions of the survey results are detailed in the summary attached as Appendix C.</p>
2	<p>Agency/Group/Organization</p> <p>Agency/Group/Organization Type</p> <p>What section of the Plan was addressed by Consultation?</p>	<p>The Contributor</p> <p>Services-Homeless</p> <p>Housing Needs Assessment</p> <p>Homeless Needs – Chronically Homeless</p> <p>Homeless Needs – Families with Children</p>

	<p>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Homeless Needs – Veterans</p> <p>Homeless Needs – Unaccompanied Youth</p> <p>Non-housing Community Development</p> <p>Prior to drafting the 2022 Annual Action Plan, MDHA held three virtual stakeholder consultation sessions to receive their input on developing the Plan. The sessions covered the following topics: Homelessness and Housing for Persons with Aids; Affordable Housing and Affirmatively Furthering Fair Housing; and Non-Housing Community Development Needs. Further descriptions of the survey results are detailed in the summary attached as Appendix C.</p>
<p>3</p>	<p>Agency/Group/Organization</p> <p>Agency/Group/Organization Type</p> <p>What section of the Plan was addressed by Consultation?</p> <p>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Step Up</p> <p>Services - Homeless</p> <p>Homeless Needs – Chronically Homeless</p> <p>Homeless Needs – Families with Children</p> <p>Homeless Needs – Veterans</p> <p>Homeless Needs – Unaccompanied Youth</p> <p>Prior to drafting the 2022 Annual Action Plan, MDHA held three virtual stakeholder consultation sessions to receive their input on developing the Plan. The sessions covered the following topics: Homelessness and Housing for Persons with Aids;</p>

	<p>What section of the Plan was addressed by Consultation?</p> <p>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Housing Needs Assessment</p> <p>Public Housing Needs</p> <p>Non-housing Community Development</p> <p>Prior to drafting the 2022 Annual Action Plan, MDHA held three virtual stakeholder consultation sessions to receive their input on developing the Plan. The sessions covered the following topics: Homelessness and Housing for Persons with Aids; Affordable Housing and Affirmatively Furthering Fair Housing; and Non-Housing Community Development Needs. Further descriptions of the survey results are detailed in the summary attached as Appendix C.</p>
6	<p>Agency/Group/Organization</p> <p>Agency/Group/Organization Type</p> <p>What section of the Plan was addressed by Consultation?</p> <p>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Pathway Lending</p> <p>Community Development Financial Institution</p> <p>Housing Needs Assessment</p> <p>Non-housing Community Development</p> <p>Economic Development</p> <p>Anti-poverty strategy</p> <p>Prior to drafting the 2022 Annual Action Plan, MDHA held three virtual stakeholder consultation sessions to receive their input on developing the Plan. The sessions covered the following topics: Homelessness and Housing for Persons with Aids; Affordable Housing and Affirmatively Furthering Fair Housing; and Non-Housing Community Development Needs. Further descriptions of the</p>

		survey results are detailed in the summary attached as Appendix C.
7	Agency/Group/Organization Agency/Group/Organization Type What section of the Plan was addressed by Consultation? How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Habitat Nashville Housing Housing Needs Assessment Prior to drafting the 2022 Annual Action Plan, MDHA held three virtual stakeholder consultation sessions to receive their input on developing the Plan. The sessions covered the following topics: Homelessness and Housing for Persons with Aids; Affordable Housing and Affirmatively Furthering Fair Housing; and Non-Housing Community Development Needs. Further descriptions of the survey results are detailed in the summary attached as Appendix C.
8	Agency/Group/Organization Agency/Group/Organization Type What section of the Plan was addressed by Consultation? How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Mending Hearts Services-Homeless Non-homeless Special Needs Housing Needs Assessment Homeless Strategy Prior to drafting the 2022 Annual Action Plan, MDHA held three virtual stakeholder consultation sessions to receive their input on developing the Plan. The sessions covered the following topics: Homelessness and Housing for Persons with Aids; Affordable Housing and Affirmatively Furthering Fair Housing; and Non-Housing Community Development Needs. Further descriptions of the

		survey results are detailed in the summary attached as Appendix C.
9	<p>Agency/Group/Organization</p> <p>Agency/Group/Organization Type</p> <p>What section of the Plan was addressed by Consultation?</p> <p>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>William F. Buchanan CDC</p> <p>Housing</p> <p>Housing Needs Assessment</p> <p>Pubic Housing Needs</p> <p>Prior to drafting the 2022 Annual Action Plan, MDHA held three virtual stakeholder consultation sessions to receive their input on developing the Plan. The sessions covered the following topics: Homelessness and Housing for Persons with Aids; Affordable Housing and Affirmatively Furthering Fair Housing; and Non-Housing Community Development Needs. Further descriptions of the survey results are detailed in the summary attached as Appendix C.</p>
10	<p>Agency/Group/Organization</p> <p>Agency/Group/Organization Type</p> <p>What section of the Plan was addressed by Consultation?</p> <p>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>The Clear Blue Company</p> <p>Housing</p> <p>Housing Needs Assessment</p> <p>Public Housing Needs</p> <p>Prior to drafting the 2022 Annual Action Plan, MDHA held three virtual stakeholder consultation sessions to receive their input on developing the Plan. The sessions covered the following topics: Homelessness and Housing for Persons with Aids; Affordable Housing and Affirmatively Furthering Fair Housing; and Non-Housing Community Development Needs. Further descriptions of the survey results are detailed in the summary attached as Appendix C.</p>

<p>11</p>	<p>Agency/Group/Organization</p> <p>Agency/Group/Organization Type</p> <p>What section of the Plan was addressed by Consultation?</p> <p>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>West Nashville Dream Center</p> <p>Housing</p> <p>Non-housing Community Development</p> <p>Economic Development</p> <p>Anti-poverty Strategy</p> <p>Housing Needs Assessment</p> <p>Prior to drafting the 2022 Annual Action Plan, MDHA held three virtual stakeholder consultation sessions to receive their input on developing the Plan. The sessions covered the following topics: Homelessness and Housing for Persons with Aids; Affordable Housing and Affirmatively Furthering Fair Housing; and Non-Housing Community Development Needs. Further descriptions of the survey results are detailed in the summary attached as Appendix C.</p>
<p>12</p>	<p>Agency/Group/Organization</p> <p>Agency/Group/Organization Type</p> <p>What section of the Plan was addressed by Consultation?</p> <p>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Homeless and Community Advocates</p> <p>Other</p> <p>Housing Needs Assessment</p> <p>Homelessness Strategy</p> <p>Non-housing Community Development</p> <p>Economic Development</p> <p>Anti-poverty Strategy</p> <p>Prior to drafting the 2022 Annual Action Plan, MDHA held three virtual stakeholder consultation sessions to receive their input on developing the Plan. The sessions covered the following topics: Homelessness and Housing for Persons with Aids; Affordable Housing and Affirmatively</p>

		<p>Furthering Fair Housing; and Non-Housing Community Development Needs. Further descriptions of the survey results are detailed in the summary attached as Appendix C.</p>
<p>13</p>	<p>Agency/Group/Organization</p> <p>Agency/Group/Organization Type</p> <p>What section of the Plan was addressed by Consultation?</p> <p>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Metro Social Services</p> <p>Other Government - Local</p> <p>Housing Needs Assessment</p> <p>Non-housing Community Development</p> <p>Anti-poverty Strategy</p> <p>Prior to drafting the 2022 Annual Action Plan, MDHA held three virtual stakeholder consultation sessions to receive their input on developing the Plan. The sessions covered the following topics: Homelessness and Housing for Persons with Aids; Affordable Housing and Affirmatively Furthering Fair Housing; and Non-Housing Community Development Needs. Further descriptions of the survey results are detailed in the summary attached as Appendix C.</p>
<p>14</p>	<p>Agency/Group/Organization</p> <p>Agency/Group/Organization Type</p> <p>What section of the Plan was addressed by Consultation?</p>	<p>Members of Metro Council and/or Metro Government</p> <p>Civic Leaders</p> <p>Other Government - Local</p> <p>Housing Needs Assessment</p> <p>Public Housing Needs</p> <p>Economic Development</p> <p>Homelessness Needs</p> <p>Non-housing Community Development Strategy</p>

<p>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Prior to drafting the 2022 Annual Action Plan, MDHA held three virtual stakeholder consultation sessions to receive their input on developing the Plan. The sessions covered the following topics: Homelessness and Housing for Persons with Aids; Affordable Housing and Affirmatively Furthering Fair Housing; and Non-Housing Community Development Needs. Further descriptions of the survey results are detailed in the summary attached as Appendix C.</p>
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Table 2 – Agencies, groups, organizations who participated

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

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

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

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
2017 Analysis of Impediments to Fair Housing Choice (formerly 2017 Joint Assessment of Fair Housing)	MDHA	The fair housing analysis took an in-depth look and disparities in housing and opportunities. Goals from this analysis are incorporated into this Plan.

2020 Community Needs Evaluation (April 2020)	Metro Social Services	The CNE provides an overview of social service needs and resources available to meet these needs. The CNE is used as a supplement for the needs assessments and market analyses undertaken through this Plan.
Affordable Housing Primer, Part 1 (January 2018), Part 2 (October 2018) and Part 3 (2019)	Metro Human Relations Commission	This Primer explains the concepts of affordable housing and analyzes gaps between incomes and housing costs and was used as a supplemental resource for this Plan.
Envision Cayce Master Plan (July 2014) and draft Envision Napier and Sudekum Transformation Plan (January 2018)	MDHA	These plans reflect MDHA’s commitment to transform areas of distressed public housing into neighborhoods of opportunity. These Plans serve as the basis for some of the geographical priorities in the Consolidated Plan.
Nashville Youth Violence Summit Report (March 2016)	Mayor’s Office	The purpose of the Report is to increase awareness concerning youth violence and address it through comprehensive community and government planning. The Consolidated Plan proposes to fund youth programs as part of this effort.
Nashville-Davidson County Continuum of Care (CoC)	MDHA/Metro Homeless Impact Division (MHID)	The CoC seeks to improve coordination of resources to maximize housing and services for homeless persons. This Plan evaluates homeless needs and

<p>Metro Government of Nashville And Davidson County Homelessness Planning Council (HPC) Strategic Community Plan (July 2019 – June 2022)</p>	<p>CoC – MHID and MDHA</p>	<p>produces a homelessness strategic plan as well as provides for funding to assist homeless persons and families.</p> <p>The HPC’s Strategic Plan is the community’s action-oriented endeavor to build an effective Housing Crisis Resolution System for Nashville-Davidson County. The 3-year plan focuses on the top priorities for the HPC to implement. The Strategic Community Plan is aligned with the federal strategic plan, ‘Home, Together’.</p>
<p>NashvilleNext (Amended August 2017)</p>	<p>Metro Planning Department</p>	<p>NashvilleNext is the City’s General Plan to guide growth through 2040. Proposed Consolidated Plan activities are consistent with NashvilleNext.</p>
<p>nMotion, Nashville MTA/RTA Strategic Plan (September 2016)</p>	<p>Metro Transit Authority</p>	<p>This Plan sets forth recommendations to address regional transportation issues as the region continues to grow. Recommendations were considered when developing strategies to address affordable housing along transit corridors.</p>
<p>PHA Five Year Plan (October 1, 2019 – September 30, 2024) & Annual Plan (October 1, 2020 – September 30, 2021)</p>	<p>MDHA</p>	<p>The PHA Plan sets forth MDHA’s vision to address the needs of public and affordable housing residents. Activities identified in the Consolidated Plan to support these needs align with the PHA Plan.</p>
<p>The Housing Nashville Report (2017)</p>	<p>Mayor’s Office of Housing</p>	<p>The Housing Nashville Report produced by the Mayor’s Office</p>

		of Housing provides benchmark data on housing and established priorities for funding, building, preserving, and retaining affordable housing options. The Consolidated Plan incorporates data and recommendations from this Report.
The Nashville Promise Zone (Designated June 2016)	Mayor’s Office in collaboration with MDHA	The 6 Promise Zone Goals related to housing, jobs, economic opportunities, education, infrastructure, and safety are reflected in the goals and priorities of the Consolidated Plan.
Transportation as a Key to Housing Affordability – Issue Brief (2018)	Tennessee Housing Development Agency	This Brief studies the impact of housing location and transportation costs. Findings from this brief were considered when determining Consolidated Plan priorities.
Fair Housing Perspectives (January 2021)	Tennessee Housing Development Agency	This Brief presents a summary of the State’s AI research and Fair Housing Plan and serves as an introduction to other briefs in a series examining fair housing issues in Tennessee.
Housing Indicators: Comparing Tennessee’s Largest Cities (August 2020)	Tennessee Housing Development Agency	This report compares the housing market of Tennessee’s four largest cities, Nashville being one.
2020-2024 State of TN Consolidated Plan (May 2020)	Tennessee Housing Development Agency	The Consolidated Plan is an assessment of the affordable housing and community development needs and market

conditions in the State of Tennessee.

Equity as a Metric in City Performance Management System (April 2020)	Metro Human Human Relations Commission	This report recommends that Metro use an Equity Lens, implemented with a racial focus, as a tool to help guide decision making and resource allocation leading to more equitable policies, programs and results
Affordable Housing Task Report June 8, 2021	Mayor's Affordable Housing Task Force	9 priority recommendations to make significant progress on affordable housing Front between 2021 - 2024

Table 3 – Other local / regional / federal planning efforts

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

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

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

As indicated in this section representatives from several local (other MDHA and Metro Departments) agencies contributed to the Plan.

PR-15 Citizen Participation

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

Summarize citizen participation process and how it impacted goal-setting

Activities proposed during the 2022 PY continue to further the priorities of the 2018-2023 Consolidated Plan which were established after a lengthy planning and public participation process. The Citizen Participation Plan provides information on how citizens can become involved in the development, implementation and evaluation of housing and community development programs.

The citizen's participation process for this 2022 Action Plan follows the procedures described in Appendix D providing a thirty (30) day comment period for the regular Consolidated Plan and Action Plans unrelated to disaster and emergency events.

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

For the purpose of the 2022 Action Plan, the public comment began on April 11, 2022, and concluded at 4:00 p.m. on May 13, 2022. During the public comment period, members of the public were invited to share their comments at an in-person and virtual public hearing. Details regarding the public comment period and public hearing are provided in the Public Notice included in Appendix D of this Action Plan.

The Public Notice was published in English and Spanish advertised in *The Tennessean*, *The Tribune*, and *El Crucero*. In addition, the Notice was posted in English and Spanish at MDHA administrative and public/affordable housing properties and on MDHA's website (www.nashville-mdha.org). The Notice was widely distributed via email to over 1412 partners, government officials, nonprofit organizations, businesses, neighborhood groups, and citizens, whose email addresses have been provided to MDHA, and was sent to the Mayor's Office, and Members of the Metro Council. MDHA encouraged recipients to circulate the Notice among their networks. The public comment period and public hearing and reminders were publicized via MDHA's social media outlets. The public hearing was held in-person and via Zoom on April 28, 2022 and made available on YouTube. A recording of the public hearing presentation was also sent out via constant contact.

Reasonable Accommodation

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

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

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Newspaper Ad (The Tennessean)	Non-targeted/broad Community	N/A	N/A	N/A	
2	Newspaper Ad (The Tribune)	Minorities	N/A	N/A	N/A	
3	Newspaper Ad (El Crucero)	Non-English Speaking (Spanish)	N/A	N/A	N/A	
4	Internet Outreach (MDHA Website)	Non-targeted/broad Community	N/A	N/A	N/A	www.nashville-mdha.org
5	Internet Outreach (Social Media)	Non-targeted/broad Community	N/A	See Appendix E.	See Appendix E.	
6	Other: Posting at MDHA's Properties Administrative Offices	Residents of Public and Assisted Housing	N/A	N/A	N/A	
7	Other: In-person and Virtual Public Hearing – April 28, 2022	Non-targeted/broad Community	See Appendix E.	See Appendix E.	See Appendix E.	

8	Other: Email Distribution – 1421 contacts	Non-targeted/broad Community	N/A	N/A	N/A	
9	Other: Video of April 28, 2022, Public Hearing available on YouTube	Non-targeted/broad community	N/A	N/A	N/A	

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

MDHA received notice from HUD that the PY 2022 formula grant allocations will not be received until around May 13, 2022. Therefore, in accordance with instruction provided by HUD in CPD Notice 22-05 the allocation amounts listed in the table below are based on the 2021 allocations and will be increased or decreased proportionately once the actual allocation amounts are received. CDBG Program Income (PI) is estimated based on the average amount of PI collected for the program. HOME PI reflects PI received as of February 2021 with estimates based on average receipts thru May 31, 2021.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 3				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Admin and Planning Economic Development Housing Public Improvements Public Services	5,073,448	348,711	0	5,422,159	5,422,159	2022 allocations.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 3				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Homebuyer assistance Multifamily rental new construction New construction for ownership	2,705,439	160,678	0	2,866,117	2,866,117	2022 allocations.
HOPWA	public - federal	Permanent housing in facilities Permanent housing placement Short term or transitional housing facilities STRMU Supportive services	2,165,642	0	0	2,165,642	2,165,642	2022 allocations.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 3				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	public - federal	Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	455,738	0	0	455,738	455,738	2022 allocations.

Table 56 - Expected Resources – Priority Table

In addition to the Consolidated Plan formula grants, funding from other Federal programs and local funds will be used to address Consolidated Plan priorities: Continuum of Care (CoC) funds, Neighborhood Stabilization Program (NSP) I and II Program Income, and CDBG Disaster Recovery (CDBG-DR) Program Income from a 2010 grant. For FY 2020 the Nashville-Davidson County CoC will receive \$6,115,465 for renewal of grants for existing homeless assistance programs to be undertaken by MDHA and nonprofit organizations. MDHA has approximately \$921,000 in NSP PI on hand from rental income from two multifamily rental projects previously acquired and constructed under the NSP programs. As soon as Grant Close-out requirement have been met and restrictions are lifted, MDHA plans to use NSP PI to fund housing activities that will benefit persons with incomes of up to 120% AMI to fill the gap for housing units for persons with incomes between 80 – 120% AMI as identified in the Mayor’s Housing Report Needs and Gap Analysis as other programs are limited to

providing units for persons whose income does not exceed 60 to 80% AMI. NSP1 PI funds will be targeted to provide units countywide, while NSP2 PI funds will be targeted to the 17 census tracts identified in the NSP2 application. It is possible that some projects will be able to use PI from both sources. The funds will be loaned or granted as gap financing to nonprofit and for-profit developers for eligible NSP activities through a Request for Application (RFA) process. The minimum affordability period will be consistent with the HOME program requirements, where the affordability period ranges from 5 to 20 years based on the amount of the per-unit investment. Any PI generated from loans to developers will be used to fund additional projects.

On average, \$165,000 in CDBG-DR PI is generated annually through housing activities undertaken by The Housing Fund (THF). The Program Income currently on hand continues to be used to, rehab homes in flood-impacted areas to LMI buyers. The Housing Fund released a Request for Proposals to identify single-family, for-sale homeownership projects in areas impacted by the 2010 Floods. Habitat for Humanity of Greater Nashville was awarded \$1,028,000 in CDBG-DR funds to construct 17 townhome units in Sherwood Commons. The units once constructed will be sold and conveyed via fee simple title to seventeen (17) households having incomes of less than 120% AMI, adjusted according to family size, based on income limits issued by HUD in effect at the time the homes are sold.

Upon completion of this project, all funds in the line of credit will be expended and the grant will be ready to close out.

It is expected that the CDBG-DR grant will be closed out in 2023; at that time, CDBG-DR PI will become PI to the CDBG program.

MDHA receives pass through funding from the Tennessee Housing Development Agency (THDA) for the U.S. Department of Energy Weatherization Assistance Program (WAP) and for the U.S. Department of Health and Human Services Low Income Home Energy Assistance Program (LIHEAP), which are used jointly to install weatherization measures for very low-income households. At the time of draft publication, current allocation amounts are used as 2022 allocations have not been announced.

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

The Metropolitan Government also funds affordable housing and homeless assistance programs. For the fall of 2021, the Barnes Fund Commission approved \$16,384,279 in grant funds to 12 non-profit organizations. The funds will create an additional 894 units. In 2021 the Metro Council allocated \$20 million American Rescue Plan Act monies to the

Barnes Fund for Affordable Housing. These funds will be awarded during the Spring of 2022.

The 2022 budget will include an ask for monies for homeless services programs for assessment and intervention services for homeless individuals and those at risk of becoming homeless so they can obtain or maintain permanent supportive housing and an ask of a little over \$2 million to fund the Metropolitan Homeless Impact Division. Additionally, Metro is finalizing plans to start construction of a new homeless services center with a minimum of 80 new units of permanent supportive housing using \$25,000,000 in General Obligation Bonds.

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

Leverage

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

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

Match Requirements

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

or by other eligible methods as provided in the HOME regulations. Amounts above the 25% match are considered leverage.

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

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

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

Metro has established a Community Land Trust to acquire property and preserve it for long-term affordability. Along with seed funding to launch the Community Land Trust, Metro has donated 15 properties. The first property was completed in February 2022. Located in North Nashville, this property will extend the opportunity of homeownership to low- and moderate-income community members in Nashville. Additionally, Metro typically makes properties available to nonprofit partners to be utilized in conjunction with affordable housing projects utilizing Barnes Housing Trust funds. A total of 84 Metro owned lots have been awarded through the Fall 2021 funding cycle.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	New Affordable Housing Opportunities	2022	2023	Non-Housing Community Development	Countywide	Address Housing Barriers	CDBG: \$ - prior year funding	Public service activities other than Low/Moderate Income Housing Benefit: 150 Persons Assisted
				Affordable Housing	Countywide		CDBG \$54,222 Housing Services For HOME Activities	Other - 1
				Affordable Housing	Countywide Housing Target Areas	Construct New Affordable Housing	HOME: \$2,579,506	Rental units constructed: 53 Household Housing Unit Homeowner Housing Added: 7 Household Housing Units

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
2	Affordable Housing Preservation	2022	2023	Affordable Housing Public Housing Non-Housing Community Development	Countywide Housing Target Areas,	Retain Affordable Housing Stock Maintain Housing Stability	CDBG: \$507,345	Homeowner Housing Rehabilitated: 120 Household Housing Unit Rental Housing Rehabilitated: 6 Household Housing Unit Public service activities other than Low/Moderate Income Housing Benefit: 125 Persons Assisted
3	Support for Homeless & Persons with HIV/AIDS	2022	2023	Homeless	Countywide	Assist Homeless Persons &	CDBG: \$253,000	Public service activities other than Low/Moderate Income Housing Benefit: 250 LMC Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
				Non-Homeless Special Needs	Metropolitan Statistical Area	Persons with HIV/AIDS	<p>HOPWA: \$2,100,673</p> <p>ESG: \$421,558</p>	<p>Tenant-based rental assistance / Rapid Rehousing: 325 Households Assisted</p> <p>Homeless Person Overnight Shelter: 2000 Persons Assisted</p> <p>Homelessness Prevention: 75 Persons Assisted</p> <p>HIV/AIDS Housing Assistance: 70 Household Housing Unit</p> <p>Other: 2519 Other</p>

4	Self-sufficiency Opportunities	2022	2023	Public Housing Non-Housing Community Development Economic Development	Countywide CDBG Target Areas	Create Economic Opportunities for LMI Persons Support Youth Programs	CDBG: \$547,000	Public service activities other than Low/Moderate Income Housing Benefit: 1320 Persons Assisted Businesses Assisted: 30
5	Neighborhood Revitalization	2022	2023	Non-Housing Community Development	CDBG Target Areas	Invest in Underserved Areas – may also meet goal 1 or 3 depending on the types of projects funded.	CDBG: \$2,976,161	Other: 3 Other
6	Administration and Planning	2022	2023	Affordable Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	Countywide Metropolitan Statistical Area CDBG Target Areas Housing Target Areas	Provide Oversight and Management of Grants	CDBG: \$1,084,431 HOPWA: \$64,969 HOME: \$286,611 ESG: \$34,180	Other: 4 Other

Table 57 – Goals Summary

Goal Descriptions

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

Projects

AP-35 Projects – 91.220(d)

Introduction

The following are proposed projects to be undertaken during the 2022 program year or utilizing 2022 allocations.

Projects

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

Table 58 - Project Information

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

Funding priorities for the 2022 Action Plan are the same as those in the 2018 – 2023 Consolidated Plan.

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

AP-38 Project Summary

Project Summary Information

1	Target Area	Countywide
	Goals Supported	Administration and Planning
	Needs Addressed	Provide Oversight and Management of Grants
	Funding	CDBG: \$1,084,431.00 (\$1,014,689.00 Grant + \$69,742.00 PI)
	Description	Funding to be used for oversight and administration of CDBG programs, including monitoring, reporting, program evaluation, fair housing activities, and the development of the Consolidated Plan and annual updates and amendments. Planning includes studies, analysis, data gathering, and preparation of plans.
	Target Date	5/31/2023
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	Countywide
	Planned Activities	Funds to be used by MDHA as the lead agency for the development and administration of the Consolidated Plan. Administrative activities include grant management, monitoring, budgeting, and planning and executing CDBG-eligible activities. MDHA may choose to partner with another entity to undertake eligible planning activities. Funding for this activity is capped at 20% of the annual CDBG allocation plus 20% of program income.
2	Project Name	CDBG Homeowner Rehab
	Target Area	Preference will be given to homeowners in Housing Target Areas but assistance may be provided in CDBG Target Areas and/or Countywide if there is not sufficient interest from homeowners fitting in these areas
	Goals Supported	Affordable Housing Preservation
	Needs Addressed	Retain Affordable Housing Stock

	Funding	CDBG: \$.00 (Funded in PYs 2018, 2019 and 2020 – activities underway and will continue in PY 2022 with prior year funding allocations.
	Description	Multi-component rehabilitation of homes occupied by LMI families.
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	40 units owned and occupied by persons with incomes at or below 80% AMI
	Location Description	Countywide for Metro Council Districts experiencing high housing costs due to increases in property values and loss of (or are at risk of losing) affordable housing due to economic pressure.
	Planned Activities	<p>Assistance will be provided in the form of forgivable loans for elderly (age 62+) homeowners. Assistance to other homeowners will be provided in the form of deferred (due on sale) loans. Repairs or improvements will be limited to items that address health and safety needs, such as heat/air, roof repair, plumbing, electrical, accessibility and aging in place.</p> <p>Priority will be given to homeowners whose incomes are at or below 50% AMI, persons with disabilities, and the elderly (age 62+). This program will be administered directly by MDHA and/or via a contracted partner.</p> <p>Homeowners may apply during the open application period, and funds will be allocated on a first-come, first-serve basis to eligible households until funding is exhausted.</p>
3	Project Name	CDBG Weatherization Assistance
	Target Area	Countywide (with preference given to households in accordance with WAP program guidelines, as applicable)
	Goals Supported	Affordable Housing Preservation
	Needs Addressed	Retain Affordable Housing Stock
	Funding	CDBG: \$.00 (Funded in PYs 2018, 2019 and 2020 – activities underway and will continue in PY 2022 with prior year funding allocations.

	Description	Installation of weatherization measures in owner-occupied units on a stand-alone basis and or in conjunction with assistance received through the U.S. Department of Energy's Weatherization Assistance Program (WAP).
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	20 units owned and occupied by households with incomes at or below 80% AMI.
	Location Description	Countywide (with preference given to households in accordance with WAP program guidelines, as applicable)
	Planned Activities	<p>CDBG funds will be used to supplement health and safety needs identified in an energy audit of each home receiving assistance. CDBG funds will be used to allow improvements to increase the efficient use of energy in structures through such means as installation of storm windows and doors, siding, wall and attic insulation, and conservations modifications, or replacement of heating and cooling equipment, including the use of solar energy equipment. Homes built prior to 1978 will have a lead-based paint evaluation.</p> <p>Assistance will be treated as a grant to eligible homeowners. Priority will be given to households in accordance with WAP program guidelines, as applicable. This program will be administered by MDHA and/or via contracted partners.</p> <p>Homeowners must apply through the DOE Weatherization Assistance Program and/or be referred via other CDBG rehabilitation programs.</p>
4	Project Name	CDBG Roof Replacement
	Target Area	Countywide
	Goals Supported	Affordable Housing Preservation
	Needs Addressed	Retain Affordable Housing Stock
	Funding	CDBG: \$.00 (Funded in PYs 2018, 2019 and 2020 – activities underway and will continue in PY 2022 with prior year funding allocations.

	Description	Repair and/or replacement of roofs and components integral to roof replacement and structure preservation, including but not limited to, fascia/soffit, gutters/downspouts, tree/limb removal, etc. in homes owned and occupied by LMI households.
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	20 units owned and occupied by LMI households (\leq 80% AMI).
	Location Description	Countywide
	Planned Activities	Repair and/or replacement of roofs in homes owned and occupied by LMI households. Assistance will be provided in the form of forgivable loans for elderly (age 62+) homeowners. Assistance to other homeowners will be provided in the form of deferred (due on sale) loans. Homeowners may apply during the open application period or be referred to the program through the regular CDBG Multi-Purpose Homeowner Rehab Program. Funds will be allocated on a first-come, first-serve basis to eligible households until funding is exhausted. This program will be administered by MDHA and/or via contracted partners.
5	Project Name	CDBG Accessibility Rehabilitation
	Target Area	Countywide
	Goals Supported	Affordable Housing Preservation
	Needs Addressed	Retain Affordable Housing Stock
	Funding	CDBG: \$\$0.00 (Funded in PYs 2018, 2019 and 2020 – activities underway and will continue in PY 2022 with prior year funding allocations.
	Description	Installation of accessibility improvements and related items integral to structure preservation for handicapped or disabled households in homes owned and occupied by LMI households.
	Target Date	6/30/2024

	Estimate the number and type of families that will benefit from the proposed activities	20 units owned and occupied by LMI households (\leq 80% AMI).
	Location Description	Countywide
	Planned Activities	Installation of accessibility improvements for elderly (62+) and/or disabled households. Assistance will be treated as a grant to eligible homeowners. Homeowners may apply during the open application period or be referred to the program through the regular CDBG Multi-Purpose Homeowner Rehab Program. Funds will be allocated on a first-come, first-serve basis to eligible households until funding is exhausted. This program will be administered by MDHA and/or via contracted partners.
6	Project Name	CDBG HVAC Replacement
	Target Area	Countywide
	Goals Supported	Affordable Housing Preservation
	Needs Addressed	Retain Affordable Housing Stock
	Funding	CDBG: \$.00 (Funded in PYs 2018, 2019 and 2020 – activities underway and will continue in PY 2022 with prior year funding allocations.
	Description	Installation of new HVAC systems or replacement of nonfunctioning HVAC units and related items integral to structure preservation in homes owned and occupied by LMI households who are not receiving assistance through the CDBG Weatherization Program.
	Target Date	9/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	20 units owned and occupied by LMI households (\leq 80% AMI) who are not receiving assistance through the CDBG Weatherization.
	Location Description	Countywide

	Planned Activities	Installation of new HVAC systems or replacement of nonfunctioning HVAC units. Assistance will be treated as a grant to eligible homeowners. Homeowners may apply during the open application period or be referred to the program through the Regular CDBG Homeowner Rehab or Weatherization and/or Home Uplift Programs. Funds will be allocated on a first-come, first-serve basis to eligible households until funding is exhausted. This program will be administered by MDHA and/or via contracted partners.
7	Project Name	CDBG Rental Rehab
	Target Area	Preference given to Housing Target Areas (assistance may be provided Countywide if there is not sufficient interest in these areas)
	Goals Supported	Affordable Housing Preservation
	Needs Addressed	Retain Affordable Housing Stock
	Funding	CDBG: \$.00 (Funded in PY2018; underway in PY 2019 and 2020 and will continue in PY 2022)
	Description	Rehab of existing units to be occupied by LMI (\leq 80% AMI) families.
	Target Date	9/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	6 LMI households (\leq 80% AMI) – prior year funds
	Location Description	Preference given to Metro Council Districts experiencing loss or are at-risk of losing affordable housing – assistance may be provided Countywide if there is not sufficient interest in these areas.

	Planned Activities	<p>Assistance will be provided to qualified landlords or developers on a first-come, first-approved basis until funding is exhausted to rehabilitate vacant, substandard rental property to lease to tenants with incomes at or below 80% AMI.</p> <p>Rehabilitation of occupied units may be considered on a case-by-case basis if the extent of the rehabilitation does not require permanent relocation of existing tenants. Projects that would require the permanent displacement of existing residents will not be eligible for funding. Funds may also be used for relocation assistance as needed.</p> <p>Assistance will be provided in the form of a forgivable loan if a landlord agrees to makes units available exclusively for Voucher holders (Section 8, VASH, etc.); otherwise, assistance will be as a low-interest loan.</p> <p>All units must remain affordable and be leased to income-eligible tenants for a minimum of 10 years. This program will be administered by MDHA and/or via contracted partners.</p>
8	Project Name	CDBG Housing Delivery Costs
	Target Area	Countywide
	Goals Supported	Affordable Housing Preservation
	Needs Addressed	Retain Affordable Housing Stock
	Funding	CDBG: \$507,345.00 (\$507,345.00 Grant)
	Description	Activity delivery costs associated with carrying out CDBG-eligible housing activities.
	Target Date	9/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	N/A. Accomplishments are tied to specific CDBG housing activities.
	Location Description	Countywide Housing Target Areas

	Planned Activities	Activity delivery costs incurred by MDHA or its contractors that are associated with the execution of the all CDBG Rehab (Homeowner and Rental) and Weatherization programs, such as reviewing and approving applications, making home inspections, preparing work-write ups, and inspecting projects through completion.
9	Project Name	CDBG Housing Services
	Target Area	Countywide
	Goals Supported	Affordable Housing Preservation
	Needs Addressed	Retain Affordable Housing Stock
	Funding	CDBG: \$54,222.00 (\$50,735.00 Grant + \$3,487.00 PI)
	Description	Activity delivery costs in support of the HOME Program.
	Target Date	9/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	N/A. Accomplishments are tied to specific HOME housing activities.
	Location Description	Countywide Housing Target Areas
	Planned Activities	Costs are also associated with housing activities that are linked to providing services to owners, tenants, contractors, and other eligible entities participating in or seeking to participate in the HOME program.
10	Project Name	CDBG Summer Youth Programs
	Target Area	Countywide
	Goals Supported	Self-sufficiency Opportunities
	Needs Addressed	Support Youth Programs
	Funding	CDBG: \$320,000.00 (\$300,000.00 Grant + \$20,000.00 PI)
	Description	New or enhanced programs undertaken by nonprofit or public agencies that serve youth ages 6-18 from LMI families during the Summer of 2022.
	Target Date	7/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	1200 youth ages 6-18 from families with incomes ≤ 80% AMI.

	Location Description	Countywide, with encouragement to recruit children living in MDHA-owned public/affordable housing.
	Planned Activities	Programs must provide new or enhanced activities that will further participants' academic, artistic, and athletic interests, as well as promote job skills development and/or healthy lifestyles, to help prepare youth to become successful adults. Programs must operate between June 1 and July 31, 2022. Funding is awarded through a competitive process.
11	Project Name	CDBG Youth Employment Programs
	Target Area	Countywide
	Goals Supported	Self-sufficiency Opportunities
	Needs Addressed	Support Youth Programs
	Funding	CDBG: \$180,000.00 (\$170,000.00 Grant + \$10,000.00 PI)
	Description	Summer employment opportunities for youth ages 14-15 from LMI families offered by nonprofit and public agencies participating in Metro's POWER program during the Summer of 2022.
	Target Date	7/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	110 youth ages 14-15 from households with incomes ≤ 80% AMI.
	Location Description	Countywide
	Planned Activities	Grants awarded to nonprofit and public agencies providing employment opportunities as part of Metro Government's "POWER" work program that focuses on the need for employment and job training opportunities for youth ages 14 – 15. Programs include one week of training and six weeks of paid, project-based community improvement work. Examples of project-based work programs include community gardens, community art projects, and neighborhood cleanup projects, etc. Programs may begin on or before June 1 and must conclude by July 31, 2022. Funding is awarded through a competitive process.

12	Project Name	CDBG Housing Assistance for the Homeless
	Target Area	Countywide
	Goals Supported	Support for Homeless Persons and Persons with HIV/AIDS
	Needs Addressed	Assist Homeless Persons & Persons with HIV/AIDS
	Funding	CDBG: \$253,000.00 (\$243,000.00 Grant + \$10,000.00 PI)
	Description	Limited assistance of one-time emergency payments for rent and utility needs for homeless persons obtaining housing through the Metro Homeless Impact Division or utilizing MDHA Voucher programs (i.e., Shelter Plus Care, VASH).
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	250 persons
	Location Description	Countywide for homeless persons who need emergency assistance for housing placement in Davidson County.
	Planned Activities	One-time emergency payments up to \$1000 per client to pay first month's rent and security and utility deposits for homeless persons obtaining housing through the Metro Homelessness Commission or utilizing MDHA Voucher programs (i.e., Shelter Plus Care, VASH). Payments are made directly to landlords and utility companies. Funds can also be used for costs associated with program delivery.
13	Project Name	CDBG Renter Counseling Services
	Target Area	Housing Target Areas and Countywide
	Goals Supported	Affordable Housing Preservation
	Needs Addressed	Maintain Housing Stability
	Funding	CDBG: \$.00 (Funded in PYs 2018 and 2020 – program got late start and was affected by COVID-19 but is currently underway and will continue in PY 2022 with prior year funding allocations.

Description	Counseling services provided to tenants countywide and MDHA-owned public/affordable housing on tenant responsibilities to help them maintain housing stability, homeownership and entrepreneurship.
Target Date	6/30/2023
Estimate the number and type of families that will benefit from the proposed activities	125 residents of MDHA-owned public/affordable housing.
Location Description	Housing Target Areas and Countywide
Planned Activities	<p>Services to MDHA residents and other LMI residents of Davidson County has been expanded to include homeownership and entrepreneurship based on what participants requested or showed an interest in learning. The original program got off to a slow start due to COVID-19, but in January, 2021 the provider started providing bi-weekly Zoom Classes with the assistance of MDHA's Envision Center and participants are scheduling follow-up one-on-one counseling. The focus of Homeownership and especially Entrepreneurship (economic development) gives the LMI and minorities in the community an opportunity to support, experience and hear from women and minority owned businesses within our communities. Financial literacy is an integral part of any class. Each program has its' own curriculum to assist in setting goals, providing resources, and empowering the participants to move forward and is designed to equip residents with tools to become responsible tenants and good neighbors and to help mitigate potential or actual problems that could result in housing loss.</p> <p>Funding was awarded to a qualified nonprofit via a competitive process in 2018 and the contract has been extended to allow activities to continue thru the 2022 PY. Funds can also be used for costs associated with program delivery.</p>

14	Project Name	CDBG Fair Housing Services
	Target Area	Countywide, with emphasis on Housing Target Areas
	Goals Supported	New Affordable Housing Opportunities Affordable Housing Preservation
	Needs Addressed	Address Housing Barriers Maintain Housing Stability
	Funding	CDBG: \$.00 (Funded in PYs 2018, 2019, and 2021 and will continue in PY 2022 with prior year funding allocations).
	Description	Fair housing counseling, outreach, and education; conduct complaint-based testing.
	Target Date	9/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	150 persons from protected classes
	Location Description	Countywide, with an emphasis on assisting LMI residents in Housing Target Areas
	Planned Activities	<p>Speaking with aggrieved individuals to inform them of their rights pertaining to Fair Housing and interacting with a potentially aggrieved individual's housing provider to determine the housing provider's version of the facts (i.e., investigation.); interacting with a housing provider to inform the housing provider of his or her obligations under applicable law, in order to bring relief to the aggrieved individual; providing legal representation to an aggrieved individual, either as a defendant or plaintiff in housing-related litigation; providing general education information to individuals to inform them of their rights in conjunction with the Fair Housing Laws; providing general educational information to individuals to inform them of their rights in conjunction with the Fair Housing Laws and project delivery costs.</p> <p>Funding was awarded to a qualified nonprofit through a competitive process in PY 2018. PY 2022 funding will extend the 2018 award agreement.</p>
15	Project Name	CDBG Employment Services
	Target Area	Housing Target Areas

	Goals Supported	Self-sufficiency Opportunities
	Needs Addressed	Create Economic Opportunities for LMI Persons
	Funding	CDBG: \$47,000.00 (\$45,000.00 Grant + \$2,000.00 PI)
	Description	Employment services to connect LMI persons to employment opportunities associated with housing construction and redevelopment projects undertaken by MDHA in Housing Target Areas, with the goal to provide Section 3 opportunities.
	Target Date	9/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	10 persons living in MDHA-owned subsidized housing
	Location Description	Housing construction/redevelopment projects undertaken by MDHA in Housing Target Area.
	Planned Activities	Employment navigation services and/or soft skills job training to assist with increasing opportunities for potential Section 3 businesses or individuals to work on MDHA projects. Funds may also be used for costs associated with project delivery. The program started in PY 2018 and is being administered by MDHA; 2022 PY funds will fund the 5 th year of the program.
16	Project Name	CDBG Public Service Program Delivery
	Target Area	Countywide
	Goals Supported	Self-sufficiency Opportunities Affordable Housing Preservation New Affordable Housing Opportunities
	Needs Addressed	Summer Youth Programs Assist Homeless Persons & Persons with HIV/AIDS Create Economic Opportunities for LMI Persons Address Housing Barriers Maintain Housing Stability
	Funding	CDBG: \$0.00 – incorporated as part of individual activity costs
	Description	Delivery costs associated with CDBG public services activities
	Target Date	05/31/2023

	Estimate the number and type of families that will benefit from the proposed activities	Accomplishments will be tied to specific Public Services Activities.
	Location Description	Countywide
	Planned Activities	Costs directly related to carrying out specific Public Services activities.
17	Project Name	CDBG Microenterprise Assistance
	Target Area	CDBG Target Areas
	Goals Supported	Self-sufficiency Opportunities
	Needs Addressed	Create Economic Opportunities for LMI Persons
	Funding	CDBG: \$0.00 (Funded in PY 2021 and will continue PY 2022 with prior year allocation)
	Description	Microenterprise assistance to a commercial enterprise that has five or fewer employees, one or more of whom owns the enterprise and is LMI.
	Target Date	9/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	30 businesses
	Location Description	Preference for businesses located in or that will be located in CDBG Target Areas, with opportunities for businesses Countywide

	Planned Activities	<p>Microenterprise assistance for businesses that have five or fewer employees, one or more of whom owns the business and is LMI. An emphasis will be placed on women-owned businesses and business opportunities for public housing residents. Activities will include recruiting program participants; providing business and personal development training programs to qualified businesses/persons; providing individual consulting to participants for the development of business plans, loan applications and business problem-solving during and after start-up; facilitating access to business mentors or volunteers such as accountants or lawyers for the duration of the contract; advising and assisting participants concerning participation with existing trade associations, business networks, and lenders.</p> <p>Program will be administered through a contracted partner(s).</p>
18	Project Name	CDBG Public Facilities and Improvements
	Target Area	CDBG Target Areas and/or Countywide
	Goals Supported	Neighborhood Revitalization or Public Facility projects, New Affordable Housing Opportunities, Support for Homeless and Persons with HIV/AIDs or Neighborhood Revitalization
	Needs Addressed	Invest in Underserved Areas or Increased access to Housing/Shelter for Persons Having Special Needs, Assist homeless persons and persons with HIV/AIDS or Investment in Underserved Areas
	Funding	CDBG: \$2,976,161.00 (\$2,742,679.00 Grant + \$233,482.00 PI)

	Description	Acquisition, construction or expansion or reconstruction, rehabilitation or installation of public and neighborhood facilities and improvements carried out by the recipient or other public or private non-profit entity. Infrastructure improvements (such as streets, sidewalks, etc.) to support affordable housing. Facilities designed for use in providing shelter for persons having special needs are considered public facilities and not subject to the prohibition of new housing construction described in §570.207(b)(3). Such facilities include shelters for the homeless; convalescent homes; hospitals, nursing homes; battered spouse shelters; halfway houses for run-away children, drug offenders or parolees; group homes for mentally retarded persons and temporary housing for disaster victims.
	Target Date	9/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	3 projects
	Location Description	Projects will be located in and serve residents in CDBG Target Areas or a minimum of 51% LMI persons or LMI limited clientele (if Countywide)
	Planned Activities	Costs include hard and soft costs, A&E costs and delivery cost associated with the project. Maintenance/operations costs are not eligible. Infrastructure Projects will be identified through collaboration with Metro. Funds for public facilities may be used for Metro or MDHA-owned projects. Public facility projects will be awarded to qualified nonprofits via an RFA process. A portion of the funding can be used for costs associated with project delivery.
19	Project Name	CDBG Public Facility Program Delivery
	Target Area	CDBG Target Areas or Countywide
	Goals Supported	Neighborhood Revitalization
	Needs Addressed	Invest in Underserved Areas or Countywide

	Funding	CDBG: \$.00 – incorporated as part of individual activity costs
	Description	Delivery costs associated with CDBG public facility/infrastructure projects.
	Target Date	9/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Accomplishments will be tied to specific public facility/infrastructure activities.
	Location Description	Projects will be located in and serve residents in CDBG Target Areas or Countywide
	Planned Activities	Costs directly related to carrying out specific public facility/infrastructure activities.
20	Project Name	HOME Administration
	Target Area	Countywide
	Goals Supported	New Affordable Housing Opportunities
	Needs Addressed	Construct New Affordable Housing
	Funding	HOME: \$286,611.00 (\$270,544.00 Grant + \$16,067.00 PI)
	Description	Provide grant management, compliance, and oversight of Home-funded activities.
	Target Date	5/31/2023
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	Countywide
	Planned Activities	Administrative costs include staff and related costs for overall program management, coordination, monitoring, reporting, and evaluation. Administrative activities will be undertaken by MDHA.
21	Project Name	HOME New Construction – Rental
	Target Area	Countywide, with a preference for Housing Target Areas
	Goals Supported	New Affordable Housing Opportunities
	Needs Addressed	Construct New Affordable Housing

Funding	HOME: \$2,006,284.00 (\$1,893,807.00 Grant + \$112,477.00 PI)
Description	Funding for construction of new units for rent to households with incomes ≤ 60% AMI.
Target Date	5/31/2025
Estimate the number and type of families that will benefit from the proposed activities	50 units (≤ 60% AMI), with priority for projects that benefit large families, persons with disabilities, and/or extremely low income tenants (0-30% AMI)
Location Description	Preference will be given to projects located in Housing Target Areas, but projects may be built Countywide if there are no eligible projects proposed in Housing Target Areas.
Planned Activities	<p>A minimum of 15% of the 2022 HOME allocation, estimated to be \$405,816.00, will be set-aside for eligible CHDO projects. The tenure of the CHDO projects will be based on developer demand and can come from the homeowner or rental project budgets.</p> <p>Additionally, MDHA may set aside a minimum of \$500,000 for the redevelopment of MDHA-owned properties converted under RAD.</p> <p>For remaining funds, MDHA may award funds on a first-come, first-served basis through an open application cycle or on a competitive basis via a Request for Proposals development.</p> <p>Financial assistance to developers may be in the form predevelopment loans, construction loans, and permanent financing.</p> <p>Eligible uses of funds include acquisition, site preparation, construction, and soft costs. All new construction projects will be subject to underwriting by MDHA and must meet HOME Site and Neighborhood Standards.</p>

		<p>Units must be occupied by tenants with incomes at or below 60% AMI. In projects with 5 or more HOME-assisted units, at least 20% of the units must serve households at or below 50% AMI.</p> <p>Projects that would require the permanent displacement of existing residents will not be eligible for funding.</p>
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22	Project Name	HOME New Construction – Ownership
	Target Area	Countywide, with a preference for Housing Target Areas
	Goals Supported	New Affordable Housing Opportunities
	Needs Addressed	Construct New Affordable Housing
	Funding	HOME: \$286,611.00 (\$270,544.00 Grant + \$16,067.00 PI)
	Description	New construction for ownership and downpayment assistance in conjunction with the purchase of these homes by LMI households (≤80% AMI).
	Target Date	5/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	7 homes (≤80% AMI), with priority given to projects that benefit large families.
	Location Description	Preference will be given to projects located in Housing Target Areas, but projects may be built Countywide if there are no eligible projects proposed in Housing Target Areas.

	Planned Activities	<p>A minimum of 15% of the 2022 HOME allocation, estimated to be \$405,816.00 will be set-aside for eligible CHDO projects. The tenure of the CHDO projects will be based on developer demand and can come from the homeowner or rental project budgets.</p> <p>Funding for the construction of new homes (including property acquisition costs), and downpayment assistance for eligible homebuyers to purchase these homes. All purchasers must receive/complete homebuyer education through a HUD or THDA approved education provider.</p> <p>MDHA may award funds on a competitive basis via a Request for Proposals or on a first come, first served basis through an open application cycle/RFP or undertake development.</p> <p>Projects that would require the permanent displacement of existing residents will not be eligible for funding.</p>
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23	Project Name	HOME New Nonprofit Partner Set-Aside
	Target Area	Countywide, with a preference for Housing Target Areas
	Goals Supported	New Affordable Housing Opportunities
	Needs Addressed	Construct New Affordable Housing
	Funding	HOME: \$286,611.00 (\$270,544.00 Grant + \$16,067.00 PI)
	Description	Funding awarded to new nonprofit partners for construction of new properties, for rent to households with incomes ≤ 60% AMI or new home construction and downpayment assistance for the purchase of these homes by LMI households (≤ 80% AMI).
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	3 units - Homeownership @ ≤80% AMI or Rental @ ≤60% AMI, with priority given to projects that benefit large families, persons with disabilities, and/or extremely low income families (0-30%)
	Location Description	Preference will be given to projects located in Housing Target Areas, but projects may be built Countywide if

	<p>there are no eligible projects proposed in Housing Target Areas.</p>
<p>Planned Activities</p>	<p>For 2022, a set-aside of HOME funds to nonprofit developers who have not been awarded HOME funds in the last five years AND have completed the Barnes Fund Capacity Building program.</p> <p>Eligible applicants must have a shovel ready project and demonstrate their ability to develop successful affordable housing projects. Eligible activities for consideration include:</p> <ul style="list-style-type: none"> • New construction of rental housing • New construction of single-family homebuyer property and direct financial assistance for LMI buyer to purchase the home. • Allowable activities include acquisition, site preparation, construction, and soft costs. <p>An organization that is awarded funds through this Set-Aside will not be eligible to apply for the next two (2) years following completion of the funding year in which funds were awarded.</p> <p>MDHA may award funds on a first come, first served basis through an open application cycle or on a competitive basis via a Request for Applications (RFA).</p> <p>Funds not obligated under this activity within 1 ½ years of the applicable program year start date may be reallocated to Rental and Homeownership project budgets not subject to the set-aside requirement.</p> <p>The 1 ½ year time period does not apply to set-aside funds made available via an RFA process that aren't awarded due to lack of demand. Those funds may be allocated to other Rental and Homeownership projects seeking/receiving awards of funds via the same RFA process if funding requests are over-subscribed.</p>

		Projects that would require the permanent displacement of existing residents will not be eligible for funding.
24	Project Name	HOPWA Housing and Supportive Services
	Target Area	Metropolitan Statistical Area
	Goals Supported	Support for Homeless & Persons with HIV/AIDS
	Needs Addressed	Assist Homeless Persons & Persons with HIV/AIDS
	Funding	HOPWA: \$2,165,642.00
	Description	Housing; short-term rent, mortgage, and utility assistance (STRMU); supportive services for persons with HIV/AIDS and their families; program administrative costs incurred by MDHA and Sponsor agencies
	Target Date	5/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	-Facility Based Rental Assistance: 50 persons -STRMU: 275 persons -Supportive Services: 2,125 persons -Short-Term/Emergency Assistance – 20 persons - TBRA: 19 persons
	Location Description	Persons with HIV/AIDS in the Nashville-Davidson—Murfreesboro-Franklin-MSA
Planned Activities	<ul style="list-style-type: none"> • \$216,564.00 for <u>Administration</u> – \$64,969.00 retained by MDHA and \$151,595.00 to be awarded to Sponsor agencies • \$1,949,078.00 for the following eligible activities: <ul style="list-style-type: none"> ○ <u>Facility Based Rental/Housing Assistance</u>– costs associated with the rental subsidy assistance of clients in project-based rental units OR facility-based housing assistance costs for leasing a transitional/short-term housing facility/unit (ex-hotels/motels) ○ <u>STRMU</u> – reasonable rent and mortgage assistance payments that represent actual housing costs; assistance varies per client depending on funds available, tenant need, and program guidelines ○ <u>Tenant Based Rental Assistance</u> – costs associated with the placement of clients in permanent housing in the private rental housing market; assistance covers a portion of the rent based upon Fair Market Rent or “reasonable rent” 	

		<p>and operates similar to the Section 8 Housing Choice Voucher Program.</p> <ul style="list-style-type: none"> ○ <u>Supportive Services</u> - services including, but are not limited to, health, mental health assessments, permanent housing placement, drug and alcohol abuse treatment and counseling, day care, transportation assistance, employment assistance, personal assistance, nutritional services, intensive care when required, and assistance in gaining access to local, State, and Federal government benefits and services, except that health services may only be provided to individuals with acquired immunodeficiency syndrome or related diseases and not to family members of these individuals. Permanent Housing Placement assistance is also covered under Supportive Services. Funds may also be used for education, infection control, PPE supplies and other services in order to prevent, prepare for and respond to the coronavirus (COVID-19). <p>All funds will be awarded to Sponsors selected for funding through an RFA to be issued in 2022. Proposals will be evaluated by a Review Committee comprised of MDHA staff, representatives of programs that serve persons living with HIV/AIDS, or individuals that are knowledgeable about various aspects of housing services in accordance with the evaluation criteria contained in the RFA and ranked from highest to lowest. Funding will be awarded for projects according to their overall rank until funding is exhausted.</p>
25	Project Name	ESG Programs and Services
	Target Area	Countywide
	Goals Supported	Support for Homeless Persons & Persons with HIV/AIDS
	Needs Addressed	Assist Homeless Persons & Persons with HIV/AIDS
	Funding	ESG: \$455,738.00
	Description	Activities to support homeless persons - rapid re-housing and homeless prevention assistance, shelter

	operations/essential services, and outreach; program and HMIS administration
Target Date	5/31/2024
Estimate the number and type of families that will benefit from the proposed activities	-Rapid Re-housing: 325 persons -Homeless Prevention: 75 persons -Shelter Operations/Essential Services: 2,000 -Outreach: 100 persons
Location Description	Countywide
Planned Activities	<ul style="list-style-type: none"> • \$34,180.00 for <u>Administration</u> – retained by MDHA for general management, oversight, and coordination of ESG programs • \$5,000.00 for <u>HMIS</u> – retained by MDHA for costs associated with providing technical assistance and training, data review, input, and quality control for ESG subrecipients • \$416,558.00 for the following eligible activities: <ul style="list-style-type: none"> ○ <u>Rapid Re-housing Assistance</u> – includes, but is not limited to, utilities, rental application fees, security deposits, etc. and other eligible activities as defined in the ESG regulations at 24 CFR, §576.104; §576.105 (Housing relocation and stabilization services) and §576.106 (Short term and medium-term rental assistance) ○ <u>Homeless Prevention</u> includes, but is not limited to, rental assistance (such as arrears) and housing relocation and stabilization services, etc., and other eligible activities as defined in the ESG regulation at 24CFR, §576.103 ○ <u>Shelter Operations*</u> - include, but are not limited to, maintenance, rent, repair, etc., and other eligible activities as defined in ESG regulations at 24 CFR §576.102(3) ○ <u>Essential Services*</u> – include, but are not limited to, case management, childcare, education services, etc., and other eligible activities as defined in ESG regulations at 24 CFR, §576.102(1) ○ <u>Street Outreach*</u> – includes, but is not limited to, the cost of engagement, case management,

		<p>emergency health and mental health, etc. and other eligible activities as defined in the ESG regulation at 24 CFR, §576-101</p> <p>*The total amount awarded for Shelter Operations, Essential Services, and Street Outreach cannot exceed \$273,443.00 (60% of the 2022 ESG Allocation).</p> <p>Funding for all activities, except Administration and HMIS, will be awarded to qualified nonprofits through a competitive process to be announced in 2022. Proposals will be evaluated by a Review Committee comprised of MDHA staff, representatives of programs that serve homeless persons, homeless or formerly homeless individuals or individuals that are knowledgeable about various aspects of the ESG program. Proposals will be evaluated in accordance with the evaluation criteria contained in the RFA and ranked from highest to lowest. Funding will be awarded for projects according to their overall rank until funding is exhausted.</p>
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AP-50 Geographic Distribution – 91.220(f)

On March 3, 2020, Metro Nashville-Davidson County was impacted by an EF-3 tornado. On September 22, 2020 Metro Nashville-Davidson County received notification that HUD was allocating \$3,240,899 in CDBG funding to address emergency needs resulting from tornados, wind damage and flooding that impacted multiple communities in March and May 2020. This funding was made available through the Declared Disaster Recovery Fund (DDRF), authorized under section 106(c)(4) of the Housing and Community Development Act of 1974. Even after extensive outreach efforts, there is little demand for these funds, as the storms occurred in March and May and the funds were not received until the end of September and most storm related damage had already been repaired through other resources. CD staff is working with HUD Knoxville to determine viable options, if any, for the use of these funds.

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

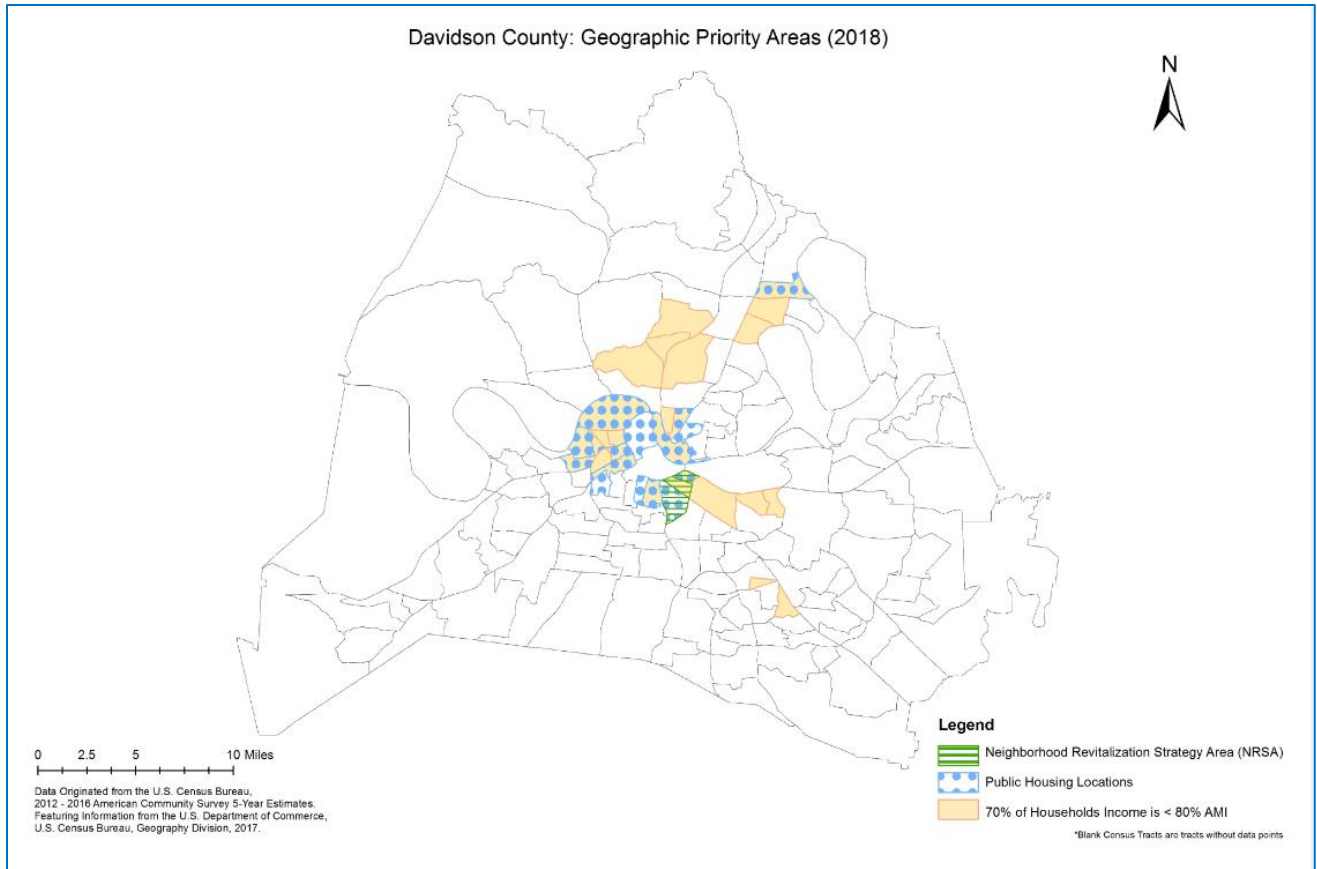
In the 2013-2018 Consolidated Plan, MDHA established certain funds/activities in three designated areas in Davidson County: 1) CDBG Target Areas, 2) Napier-Sudekum Choice Neighborhoods Initiative (CNI) Planning Area, and 2) Housing Target Areas, as described below. The Napier-Sudekum CNI was removed as a target area via substantial amendment 4 to the 2018-2023 Consolidated Plan in 2021. *Public Facility/Improvement projects located in CDBG Target Areas will receive priority for funding based on demand, but funds can be used countywide on projects that benefit LMI persons. **Additionally, Fair Housing Counseling services will be available countywide with an emphasis on Housing Target Areas. For 2022 the budgeted allocation will be prioritized as follows. Remaining CDBG, ESG, and HOPWA funds will be deployed countywide, while HOPWA funds are used to assist persons with HIV/AIDS throughout the MSA.

Geographic Distribution

Target Area	Percentage of Funds
*CDBG Target Areas	55%
**Housing Target Areas	25%

Table 59 - Geographic Distribution

The following map shows the CDBG Targeted Census Tracts. The shaded areas are the CDBG Targeted Census Tracts. Blue dots indicate Census tracts in which MDHA-owned public/affordable housing is located. The green dots represented Napier-Sudekum which is still eligible as MDHA-owned housing and is still located in the Housing Target Areas.



Geographic Priority Areas

Metro Nashville-Davidson County was hit by Tornados on March 3, 2020 and other storms in the later spring of 2020 and flooding in 2021. Thus, based on demand, preference for assistance in rehabilitation and public facility projects will be given to residents residing in storm or flood damaged areas that meet the criteria for eligible projects/activities.

1	Area Name:	CDBG Target Areas
	Area Type:	Local Target area
	Other Target Area Description:	N/A
	HUD Approval Date:	TBD
	% of Low/ Mod:	Target Areas are comprised of 26 Census tracts in Davidson County in which at least 70% of households in the Census tract have incomes ≤80% AMI. The % of LMI households for each Census tract is provided in the subsequent table.

Revital Type:	Comprehensive
Other Revital Description:	N/A
Identify the neighborhood boundaries for this target area.	See list of Census tracts that follows this table.
Include specific housing and commercial characteristics of this target area.	There are 33,380 households in the 26 Census tracts. In addition, there are 13 MDHA-owned public/affordable housing properties in these areas.
How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	The fair housing analysis conducted in 2017 identified Census tracts in Davidson County reflecting disparities in access to opportunity. These areas tend to be segregated by race or ethnicity and have high rates of poverty. There is a strong correlation between living in higher poverty areas and lower school performance, lower access to the labor market, greater reliance on public transportation, greater concentrations of public housing, and food deserts. When asked on the Survey conducted for this Plan, many respondents indicated these same areas.
Identify the needs in this target area.	Needs that have been identified include sidewalks and parks; programs for youth; anti-poverty programs (such as financial literacy programs; workforce development/job training); and more retail/commercial options.
What are the opportunities for improvement in this target area?	CDBG funds for public facilities and improvements, as well as microenterprise assistance will be targeted to these areas. Some of these areas may be in Housing Target Areas as well, where funds are targeted for homeowner and rental rehab of existing affordable housing, which add tools for revitalization. 19 of the 26 Census tracts are in the Nashville Promise Zone.
Are there barriers to improvement in this target area?	Limited availability of public funds and challenges in attracting private investment.

The following table lists the Census tracts in this targeted area. The table is sorted by the percentage of households with incomes under \$50,000 in descending order, with the largest percentage listed first. To determine the Census tract number for a property, see Exhibit 1.

Census Tract	Estimate; Total HH's:	HH's Under \$50,000	Percentage under \$50,000	Promise Zone	Council Districts	MDHA Sites
148	1001	945	94%	Subzone 3	19	Napier Place, Sudekum Apartments
193	1259	1153	92%	Subzone 1	5, 6	Cayce Place, Edgefield Manor
142	878	790	90%	Subzone 5	19, 21	Andrew Jackson Courts
139	679	606	89%	Subzone 5	21	
107.02	1750	1527	87%		7, 8	
159	1163	1012	87%	Subzone 3	19, 17	
136.02	146	124	85%	Subzone 5	21	Hadley Park Towers
136.01	1296	1099	85%	Subzone 5	21	Historic Preston Taylor Apartments, Hadley Park Towers
104.02	2363	1934	82%		9	Madison Towers
162	1384	1081	78%	Subzone 2	17, 19	Edgehill Homes, Gernert Studio Apartments
126	837	650	78%	Subzone 1	5	
160	410	318	78%	Subzone 3	17	
110.01	2169	1682	78%		2, 8	
118	1014	785	77%	Subzone 1	5	Levy Place
143	771	594	77%	Subzone 5	21	
137	2403	1838	76%	Subzone 5	2, 21	Cumberland View
158.04	2140	1617	76%	Subzone 3	13	
144	674	503	75%	Subzone 5	19, 21	J. Henry Hale Apartments
109.04	1250	922	74%		3	
127.01	2147	1575	73%	Subzone 5	2	
190.05	1229	897	73%	Subzone 4	26	
138	694	504	73%	Subzone 5	21	
191.08	1196	868	73%		30	
158.03	890	639	72%	Subzone 3	19, 15, 13	
107.01	1726	1217	71%		7, 8, 9	
109.03	1911	1345	70%		3,8	

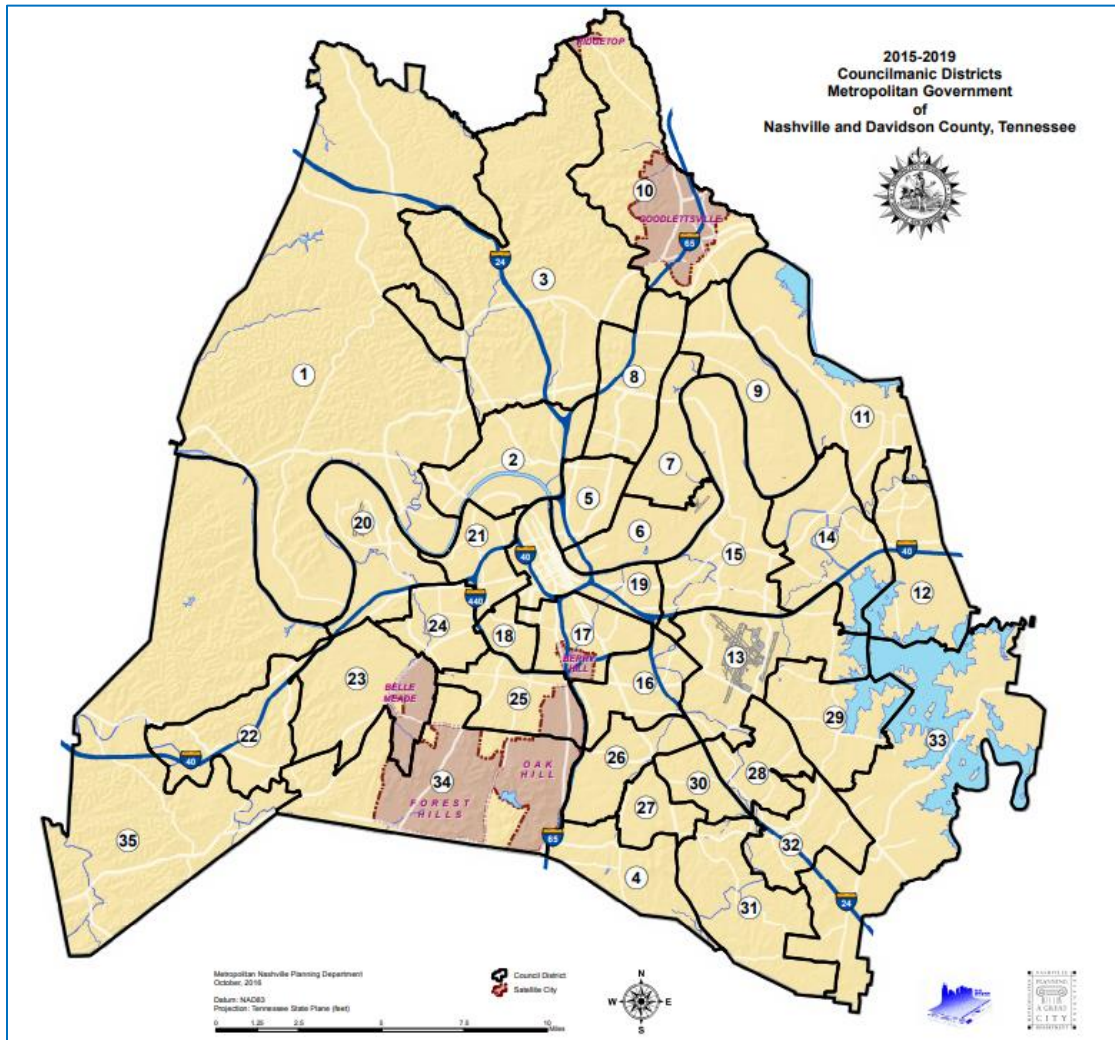
2	Area Name:	Housing Target Areas
	Area Type:	Metro Council Districts
	Other Target Area Description:	N/A
	HUD Approval Date:	TBD
	% of Low/ Mod:	
	Revital Type:	Housing
	Other Revital Description:	Housing preservation and new housing construction
	Identify the neighborhood boundaries for this target area.	14 Metro Council Districts listed in the next table as well as areas in which MDHA-owned public/affordable housing is located (blue dots on previous map).
	Include specific housing and commercial characteristics of this target area.	<p>The 14 Council Districts in the Housing Target Area experienced at least a 40% increase in property values during the 2017 reappraisal. According to Metro's Open Data Portal, seven of the Districts are in the top 14 for Property Standards Violations (since 5/1/2015); 10 are in the top 14 for percentage of Building Permits Issued (since 5/1/2013); and seven are in the top 14 for Total Value of Permits.</p> <p>22 MDHA-owned properties house over 5,000 units occupied by low-income households; seven of these are older, distressed properties in which MDHA plans to redevelop into mixed-income, mixed-use communities.</p>
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	<p>Input for the 2017 fair housing analysis as well as for this Plan expressed strong concern about the loss of affordable housing due to Nashville's growth, which is displacing residents from their homes. This input is substantiated by the <i>Housing Nashville Report</i>.</p> <p>Analyses and input also revealed the need for reducing concentrations of poverty as MDHA proposes for its sites.</p>
Identify the needs in this target area.	Preserve existing affordable housing in gentrifying areas and create new affordable units.	

<p>What are the opportunities for improvement in this target area?</p>	<p>Local discussions on affordable housing have brought these needs into the spotlight, and more nonprofit and for-profit developers are interested in providing affordable housing.</p> <p>Master planning for four MDHA sites is complete (Cayce) or underway (Napier, Sudekum, and Edgehill); with MDHA’s first mixed-income housing under construction and the second one breaking ground on May 10, 2018. MDHA will replace all public housing one-for-one while adding workforce (80-120%) and market rate units.</p>
<p>Are there barriers to improvement in this target area?</p>	<p>The primary challenges will be outreach and garnering participation in the homeowner and rental rehab programs. For new affordable housing, the challenge will be securing affordable land and financing.</p>

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

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

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



Rationale for the priorities for allocating investments geographically

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

In addition to targeting funds to certain geographical areas as described above, funds for

housing programs are also prioritized for the following populations:

- 2020 storm victims, based on demand, if CDBG-DDRF does not meet the needs
- 2021 flood victims, based on demand
- Large families
- Persons with disabilities
- Elderly (age 62+)
- Very low-income households ($\leq 50\%$ AMI).

Housing for Persons with AIDS (HOPWA)

HOPWA is the only program administered by MDHA that provides services to households outside the Metro Nashville-Davidson County boundary, as this funding is not targeted towards a specific geographic area, but rather towards persons living with AIDS/HIV and their families. HOPWA funding is distributed through the broader Nashville-Davidson—Murfreesboro—Franklin Metropolitan Statistical Area (MSA), comprised of Cannon, Cheatham, Davidson, Dickson, Macon, Robertson, Rutherford, Smith, Sumner, Trousdale, Williamson, and Wilson Counties. **Housing**

AP-55 Affordable Housing – 91.220(g)

Introduction

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

One Year Goals for the Number of Households to be Supported	
Homeless (ESG - CDBG)	650
Non-Homeless (CDBG & HOME)	171
Special-Needs (HOPWA)	344
Total	1165

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

One Year Goals for the Number of Households Supported Through	
Rental Assistance (ESG, CDBG & HOPWA)	994
The Production of New Units (HOME)	61
Rehab of Existing Units (CDBG)	110
Acquisition of Existing Units	0
Total	1165

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

AP-60 Public Housing – 91.220(h)

Introduction

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

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

To support MDHA's redevelopment efforts, approximately \$500,000 of HOME funds may be used for new construction of mixed-income housing as part of an "Envision" initiative. The HOME-assisted units will be restricted to households with incomes $\leq 60\%$ AMI.

To connect residents to jobs associated with MDHA redevelopment efforts or Community Development projects and further Section 3 opportunities, CDBG will continue to be used to provide employment services.

To help public housing residents maintain housing stability, CDBG funds will continue to be used to provide renter counseling services to MDHA residents and other LMI residents of Davidson County and has been expanded to include homeownership and entrepreneurship based on what the participants requested or showed an interest in learning. The program got off to a slow start due to COVID-19, but in January, 2021 the provider started providing bi-weekly Zoom Classes with the assistance of MDHA's Envision Center and participants are scheduling one-on-one counseling. The focus on Homeownership and especially Entrepreneurship (economic development) gives the LMI and minorities in the community an opportunity to support, experience and hear from women and minority owned businesses within our communities. Financial literacy is an integral part of any class. Each of the programs has its' own curriculum to assist in setting goals, providing resources, and empowering the participants to move forward.

The Envision Center at Napier Sudekum (EC) is a one-stop-shop serving Napier Place, Sudekum Apartments, and the broader South Nashville community, which focuses on services related to lifelong learning, economic advancement, health and wellness, and community leadership. The EC is staffed with Navigators that assist clients in the creation of assessing needs, setting goals, and individualized plans to achieve them. The Navigators also provide ongoing support as clients' access services through an integrated service delivery model. In addition to navigation services clients of the EC have access to HiSET classes, virtual financial literacy education group classes and homebuyer education group sessions through Zoom meetings. MDHA's ConnectHome program is serving students in 3-12 grades with digital literacy and good digital citizen education.

Throughout COVID, the EC has also assisted vulnerable clients' access resources and services including food boxes, prepared meal delivery for families with children and also includes educational materials for children in the household, and household supplies. Most recent EC staff have worked with hospital and clinic partners to connect bring COVID-19 vaccination clinics and testing paired with outreach and educational opportunities into the community to maximize access.

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

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

- Two public housing residents are appointed to the 7 member MDHA Board of Commissioners.
- Each property has a resident association that actively engages the residents and coordinates activities with property management. The president of each resident association meets with MDHA leadership annually to review the PHA Annual Plan.
- At each monthly MDHA Board meeting, a property manager and a resident association president are invited to address the Board and provide updates on activities occurring at their properties and relay needs to the Board.
- MDHA's "Envision" process encourages residents to participate in the master planning process for their sites and specific meetings are held to obtain their input.
- MDHA's Affordable Housing Department and Rental Assistance Department offer self-sufficiency programs that create pathways to homeownership. This past program year, 2 residents in Affordable Housing were able to purchase homes, 3 voucher-holders made offers to purchase homes but were out-bid. The high cost of housing is detriment to achieving homeownership.

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

Not applicable.

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

Introduction

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

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

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

<https://www.nashville.gov/Social-Services/Homeless-Impact-Division.aspx>.

In August 2019, the Homelessness Planning Council approved a 3-year Strategic Plan, the community's action-oriented endeavor to build an effective Housing Crisis Resolution System for Nashville-Davidson County. This plan intends to create a system where no person is forced to be homeless for more than an average of 90 days. Rather than serve as a comprehensive wish list that addresses every need of each person, community partner, or entity with interest and/or concerns around homelessness, the goal of the strategic plan is to build a strong foundation for the Housing Crisis Resolution System. The strategies outlined in the plan are action-oriented, time-based and outcome-driven. The plan highlights top priorities for the Homelessness Planning Council to implement

and measure outcomes on behalf of, and with, community partners. The Strategic Community Plan is aligned with the federal strategic plan, “Home Together” 1, which aims to prevent and end homelessness for all people experiencing a housing crisis. Progress of the Strategic Community Plan will be evaluated on a regular basis with annual and/or quarterly reports provided to the Homelessness Planning Council and the Continuum of Care General Membership. The intention is to update the plan during an annual review process. Monthly committee reports outlining each committee’s progress of assigned action items from the strategic plan are sent to the Homelessness Planning Council. The plan can be found online at:

https://www.nashville.gov/Portals/0/SiteContent/SocialServices/docs/hc/Reports/Strategic%20Community%20Plan%207.3.19_committee%20approved.pdf

The Homeless Planning Council is in the process of updating the Strategic Plan that was prepared in 2019.

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

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

- Continue implementing the 3-year strategic plan with clear priorities on how our community builds an effective Housing Crisis Resolution System, with specific action plans that outline responsible parties. This plan was adopted by the Homelessness Planning Council on August 14, 2019.
- Update this strategic plan for 2022-2025, and streamline the action steps, while clarifying responsible parties accountable for accomplishing goals.
- Improve coordination efforts among service providers through increased investment in HMIS.
- Enhance data entry into HMIS by street outreach staff, to better understand Nashville’s unsheltered population, and evaluate that data regularly to gauge changes.
- Invest in activities that lead people experiencing homelessness to permanent housing as quickly as possible while offering a variety of interventions to address persons’ unique needs.
- Use ESG funds to assist approximately 325 people with rapid rehousing and 75 households with homeless prevention services; serve approximately 2,000 individuals via shelters and essential services; and, with ESG-funded and other community partners, engage a minimum of 100 individuals via street outreach

efforts with the goal to link them through our Coordinated Entry (CE) process with housing opportunities.

- Enhance supports to individuals housed using HUD ESG-CV funds.
-
- Effectively utilize subsidies such as the 100 new mainstream housing vouchers awarded to MDHA in December 2020, which were effective as of 3/1/2021.
 - Expand the inventory of available housing units for persons served with Rapid Rehousing assistance when their rental assistance ends, via housing search and access to more landlords.
 - Streamline access to Shelter Plus Care and other vouchers to ensure we prioritize people according to their need, and link them through CE to the right resources.
 - Nashville was selected by HUD to be one of 8 CoCs across the country to participate in an inaugural community “Equity Demo” cohort that is working together to design more equitable assessment and prioritization processes. The local Equity Core Team is collecting local data on black males among the homeless population to confirm disparities in numbers and outcomes, & will then outline action steps to begin addressing these issues.
 - Heighten awareness of the racial inequities across housing, economic mobility, health care, criminal justice, and other systems. These all contribute to racial inequities in homelessness. Urge community members to pledge to actively and intentionally practice antiracism when participating in CoC committee meetings, representing the CoC in the community, and when talking about homelessness and housing issues in Nashville. The Homelessness Planning Council took a first step in this endeavor by forming an Equity and Diversity Committee and formally endorsing an Anti-Racist Pledge during its January 13, 2021 meeting. This pledge is read at CoC committee meetings, as well as at the beginning of each Planning Council meeting.
 - Continue to identify and address existing disparities and inequities in the homeless services and housing system – including, but not limited to, representation in the population of people experiencing homelessness, access and placement, hiring practices and workforce patterns, interaction with colleagues and clients, and health and economic outcomes.
 - Use CDBG funds to assist approximately 250 homeless individuals with one-time, emergency payments to pay for first month’s rent, security and utility deposits for housing obtained via MHID or utilizing MDHA Shelter Plus Care or VASH voucher programs. Work to assess and improve the community’s system for addressing homelessness by increasing the efficiency and effectiveness of our housing crisis resolution system.

- Work to broaden the implementation of CE for people experiencing homelessness and those at risk of homelessness.
- Continue to provide homelessness prevention and diversion services to those who are still housed.
- Continue to prioritize ESG prevention funds to assist persons with histories of homelessness.
- Continue to increase system capacity in outreach and housing navigation services.
- Continue the work to adopt minimum standards for street outreach and improve the coordination between different street outreach groups.
- Increase permanent housing opportunities, linked to appropriate supports, for homeless veterans, chronic/vulnerable homeless persons, families and youth, as well as other persons experiencing homelessness who do not fit into these categories (living in encampments).
- Expand rapid rehousing opportunities for homeless youth & young adults (YYA), as well as create diversion options to avoid homelessness for this subpopulation.
- Support the continued work of the CE, specifically for victims of domestic violence, as well as the rapid rehousing resources for this subpopulation, made possible via three CoC bonus projects awarded by HUD to The Mary Parrish Center.
- Continue to address barriers to housing entry by using available resources, such as, but not limited to, up-front housing costs like rent/utility deposits and first-month's rent.
- Continue to expand and improve implementation of CE and include an equity lens while doing so.
- Continue marketing efforts to ensure different populations know where the main entry points to services are.
- Continue to educate service providers so they know how to link and partner with trained housing navigators.
- Continue to expand efforts to connect people who were experiencing homelessness when they entered institutions (hospitals, jail, mental health facilities, etc.) with housing navigators as part of their discharge planning to avoid people being released to the streets or shelters.
- Continue to provide CoC partners with information on available services to ensure that they have the resources to link people to available mainstream services and homeless-specific services.
- Support further developments within the Homeless Court in Nashville.

Addressing the emergency shelter and transitional housing needs of homeless persons

The Metro Homeless Impact Division (MHID) is dedicated to continual improvement of CE to ensure people experiencing literal homelessness have immediate access to emergency shelter and, when appropriate, to transitional housing programs. We need to analyze current shelter occupancy numbers to see if emergency and transitional beds are utilized at a high capacity. The CoC Shelter Committee is discussing access to shelter, how to remove barriers to shelter, and potentially create alternative shelter options for all populations with a Housing First approach. This committee should analyze city funds budgeted and spent on overflow shelter costs, occupancy rates at all shelters in Nashville, and develop a recommendation to the city about how best to allocate resources in a new way that saves lives and reduces duplication of tax dollars and private donations.

The following strategies will help address the needs to evaluate appropriate referrals to fill beds with people with highest need:

- Develop a solid prevention and diversion effort;
- Quickly link people to emergency beds;
- Coordinate exit strategies that allow newly identified low-income affordable housing units to be filled with people who experience literal homelessness;
- Create an in-reach team to assist shelter providers with housing navigation and enter people into CE;
- Improve data sharing to know how long people stay in shelter beds and where they go when they exit;
- Educate providers across the CoC on eligibility requirements for different transitional housing to promote appropriate referrals (ideally through CE);
- Assist transitional housing providers to coordinate with other agencies when people leave their programs, so that they do not return to literal homelessness;
- Develop warm hand-off protocols to support people as they exit shelter and transitional housing beds;
- Link housing navigators with transitional housing providers to assist in the housing search coordination if needed;
- Share housing resources/destination information and eligibility criteria to provide people in emergency shelters and transitional housing with options;
- Continue to evaluate innovative approaches such as developing bridge housing, navigation centers, safe havens, service centers, night centers, etc. to address the needs of people who identify themselves as shelter-resistant.

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

- Link people with available housing opportunities as quickly as possible and support them in accessing subsidies and increasing their income to help them sustain their housing long-term.
- Build a diversion program with resources to identify and work with families who were recently homeless to prevent them from becoming homeless again.
- Continue to use CDBG funds to cover one-time move-in costs (security and utility deposits and first month's rent) for households experiencing literal homelessness.
- Identify flex funding to assist with other move-in costs, including arrears that keep people out of housing, including but not limited to, pet deposits, application fees, pro-rated rent, furniture, etc.
- Create a landlord mitigation fund to incentivize landlords to work with providers on a Housing First approach.
- Explore funding opportunities to increase services for people transitioning from literal homelessness to permanent housing and deploy a progressive engagement approach to start with the least intervention level and increase it as needed.
- Enhance services & housing placement in Nashville by exploring resource opportunities to add 24-hour care coordination, psych support and medication management for chronically homeless persons as they move to permanent supportive housing.
- Enhance community understanding of Housing First by offering training and learning opportunities.
- Work with public agencies, private and nonprofit developers to explore opportunities to build affordable housing and permanent supportive housing units.
- Develop a public/private partnership to create landlord incentive programs such as a risk-mitigation fund, move-in cost assistance
- Support the continued partnership between MDHA and the Metropolitan Homeless Impact Division that dedicates up to 18 housing choice vouchers per month to households experiencing literal homelessness.
- Include Shelter Plus Care referrals in the CE process.
- Strengthen the ongoing landlord outreach process by improved coordination between the city and service providers who search for housing opportunities for their

clients. Include the use of the Tennessee Housing Development Agency's <http://www.tnhousingsearch.org>.

- Develop solid By Name Lists for families, Veterans, Youth & Young Adults, with prioritization for housing for the most vulnerable people experiencing literal homelessness.
- Through a written agreement and regular collaboration between homeless service providers and employment service providers, increase access to employment and employment supports. This includes a minimum of quarterly meetings to focus on mitigating a wide variety of barriers to employment such as criminal records, English as a second language, access to childcare, and internet access. Additionally, it includes building direct contacts and relationships between service providers for individual trouble shooting when someone has difficulty obtaining and/or maintaining employment.
- Continue the Community Mental Health Systems Improvement (CMHSI) efforts to bring together partners from the health, mental health, criminal justice and homeless systems to improve coordination for the most vulnerable populations and link them with stable housing by ensuring all partners are aware of available local, state and government homeless funding sources to support the housing needs of this population.
- Assure that ESG- & CoC-funded agencies take referrals via CE & abide by the CE Policies and Procedures and study the effectiveness of the VI-SPDAT as a prioritization tool, particularly as it relates to race.

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

Primarily via Community Mental Health Systems Improvement (CMHSI) efforts:

- Increase systems coordination and education of discharge personnel at different institutions with discharge procedures in place to prevent homelessness upon discharge, i.e., Foster Care, Mental health, Physical health and Criminal Justice and Correctional systems to identify people at risk of homelessness and link them with supports to prevent them from becoming literally homeless after discharge;
- Improve cross-sector approaches and coordination between hospital and health care providers and our local criminal justice system, starting with a focus on people with

mental health diagnoses.

Attempt to avoid homelessness among youth via:

- Improved coordination with the state Department of Children Services and support of their effort to expand services for youth exiting foster care with a focus on prevention efforts.
 - Support of diversion programs such as the YHDP project operating at Oasis Center.

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

One year goals for the number of households to be provided housing through the use of HOPWA for:	
Short-term rent, mortgage, and utility assistance payments	275
Tenant -Based Rental Assistance	19
Units provided in permanent housing facilities developed, leased, or operated with HOPWA	50
Units provided in transitional short-term housing facilities developed, leased, or operated with HOPWA funds	20
Total	364

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

Introduction:

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

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

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

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

AP-85 Other Actions – 91.220(k)

Actions planned to address obstacles to meeting underserved needs

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

Actions planned to foster and maintain affordable housing

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

Actions planned to reduce lead-based paint hazards

- Implement housing related activities in accordance with all applicable HUD, EPA, and State of Tennessee regulations.
- Provide all rehab clients and potential clients with the “Lead- Based Paint” pamphlet that describes hazards of lead-based paint. Pursuant to 24 CFR Part 35, all rental and homeowner dwelling units that wish to receive federal assistance and

were built prior to 1978 are tested for lead-based paint. (These tests consist of visual inspections, lead screens, and full assessments. Additionally, when properties test positive for LPB hazards, interim controls are performed and LBP clearances are provided.)

- Address lead- based paint hazards as part of the home rehab programs and rehab of shelters and community centers.

Actions planned to reduce the number of poverty-level families

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

Actions planned to develop institutional structure

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

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

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

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

Introduction:

In accordance with federal regulations, this Action Plan describes the CDBG, HOME, and ESG activities proposed to be undertaken with 2022 allocations. To the extent allowed by federal regulations, MDHA may claim costs incurred prior to the effective date of respective grant agreement.

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

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

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

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

Other CDBG Requirements

1. The amount of urgent need activities	0
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**HOME Investment Partnership Program (HOME)
Reference 24 CFR 91.220(I)(2)**

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

N/A

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

HOME Resale/Recapture Guidelines are provided in Appendix A.

On May 4, 2021, HUD issued 2021 homeownership value limits (effective June 1, 2021) for the HOME program. Upon review of limits, MDHA became concerned that the HUD-provided limits were lower than the values in the current Nashville market. Review of local housing data substantiated these suspicions. As a result, MDHA is submitting documentation in Appendix B of this Action Plan seeking HUD approval for MDHA to use local value limits established in accordance with the requirements and methodology outlined at 24 CFR 92.254(a)(2)(iii). Based on the data provided using the prescribed methodology, 95% of the median purchase price limit will be \$451,250 for single family existing construction and \$426,993 for single family new construction. These are the value limits MDHA will utilize to ensure homes acquired with HOME funds comply with modest housing requirement of 24 CFR 92.254. All Homes must be sold to households with incomes at or below 80% AMI.

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

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

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

N/A

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

1. Include written standards for providing ESG assistance

Nashville's ad hoc CoC Written Standards Committee began meeting in late January 2019 to revise a January 2018 draft document to guide the provision of housing and services funded via both HUD CoC and ESG dollars. A final draft was emailed to a CoC listserv of over 500 stakeholders, including agencies awarded CoC and ESG funding, for review and input. The draft was also publicly posted on the MDHA's website for comment. The Written Standards were approved by the Homelessness Planning Council on September 23, 2019.

The CoC Written Standards Ad Hoc Committee, now called the CoC Standards of Care Committee and a standing committee of the CoC, includes members from the following agencies, most of which receive either CoC and/or ESG funding:

- Vanderbilt
- Operation Stand Down
- Mental Health Cooperative
- Safe Haven Family Shelter
- Metro Social Services
- Oasis Center

The committee later updated the standards to reflect the influx of ESG-CV dollars for RRH. Those standards were approved in July 2021 by the Homelessness Planning Council, and can be found at:

<http://www.nashville-mdha.org/wp-content/uploads/2021/08/Continuum-of-Care-Coc-Emergency-Solutions-Grants-ESG-Standards-of-Care.pdf> .

The July 2021 document represents the completion of the first phase of the update process. The Standards of Care committee is collaborating with the CoC Shelter Committee to include updated shelter standards that encompass best practice for more than just CoC and ESG funded shelter. Based on the Homelessness Planning Council's Strategic Community Plan, the Standards of Care committee's discussion, and HUD Technical Assistance advice, the following are critical topics to be further discussed during Phase 2:

- Housing First policies, philosophy, and culture
- Coordinated Entry (CE) Evaluation
- COC/ESG Program Evaluation (including finalizing benchmarks)
- Prevention and Diversion Training
- After hours care
- Domestic Violence Planning
- Racial Equity

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

The Nashville-Davidson County Coordinated Entry (CE) has a de-centralized access approach with designated entry points for different populations (individuals, families, youth, and Veterans). The Metropolitan Homeless Impact Division (MHID) has designated a staff member to help the community coordinate and build CE. This individual serves as the planning lead, by staffing specific committees, and being the main contact point for approximately 45 agencies that participate actively in CE.

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

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

The CoC is in the process of strengthening its prioritization methods in Nashville/Davidson County. Generally, priority will be given to households who have

high scores on the VI-SPDAT; with the length of homelessness and any extenuating circumstances raised during weekly care coordination meetings also factored in.

Our community holds four 4 different care coordination meetings where provider agencies discuss the households with the highest barriers to housing and consult on how to assist those households to move to permanent housing and link them with the right supports as quickly as possible. Each care coordination group meets every week and focus on Veterans, families with minor children, individuals and youth. The CoC has received grant funding for (3) three CE intake specialists that conduct outreach and in-reach across Davidson County to identify people experiencing homelessness and link them to the best organization/agency that can provide services and housing as quickly as possible based on the client's needs.

In addition, a stakeholder group involving nine (9) organizations with street outreach teams is working on setting minimum standards for street outreach efforts, which will include entering people living in encampments and on the streets into CE.

The CoC Written Standards of Care Committee will be working on improvements to CE that includes but are not limited to a plan to provide after-hour services.

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

In addition, the CoC has established and is in the process of strengthening a Consumer Advisory Board, to provide ongoing feedback on our overall Housing Crisis Resolution System.

The MHID trains and coordinates with housing navigators, who are the frontline staff, at 45 partner agencies that coordinate services and housing for people accessing CE.

FY2018 CoC funding awards strengthened the city's CE and HMIS capabilities. Nashville garnered three (3) new Domestic Violence bonus projects; one is developing a CE specifically designed to serve this subpopulation, which will eventually be integrated into the CE for all populations. An HMIS Expansion grant was also awarded that will double staffing capacity to assure more robust and accurate data collection efforts in Nashville. The CoC is awaiting the final report of our CE evaluation, which is going to be used as the starting point to determining a new assessment and prioritization process in the community.

3. Identify the process for making sub-awards and describe how the ESG

allocation available to private nonprofit organizations (including community and faith-based organizations).

A Request for Applications is emailed to over 40 community- and faith-based entities and/or governmental agencies, advertised in several local papers and published on the MDHA website. Application responses are reviewed and rated by a five to six-member review committee based on the following evaluation criteria: Project Quality; Need for Project; Operational Feasibility; Applicant Capacity, including HMIS data quality; and proven ability to stabilize homeless people with housing and income supports. Awards are made based on the highest ranked scores of the applications and recommendations of the review committee. The review committee typically includes staff from various funding agencies, program coordinators and a formerly homeless person. In 2021, a member of the CoC Performance Evaluation Committee (PEC) also served on the ESG evaluation committee. Discussions are underway to potentially merge the PEC and ESG review committees to allow them to review both programs to facilitate increased coordination between the funding sources.

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

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

5. Describe performance standards for evaluating ESG.

The CoC Written Standards of Care Committee updated Nashville's standards of care to reflect the influx of ESG-CV dollars for RRH. Those standards were approved in July 2021 by the city's Homelessness Planning Council, and can be found at:

<http://www.nashville-mdha.org/wp-content/uploads/2021/08/Continuum-of-Care-Coc-Emergency-Solutions-Grants-ESG-Standards-of-Care.pdf> .

This is a work in progress, as the Continuum increases its focus on data collected via HMIS (& comparable databases, in the case of domestic violence shelters), and intends to broaden the reach of the standards to projects that do not receive CoC or ESG funding. The 2021 document contains the following performance benchmarks for ESG projects:

Emergency Shelter		Target
	Exits to Permanent Housing	85% - Shelters – 90% - Prevention and Rapid Rehousing
	Length of Stay	Average of 90 days - shelters

Agencies using ESG funds will continue to strive to assure that housing stability & incomes are increasing for persons served via ESG funds, as well as attempt to shorten stays in shelter and reduce recidivism.

METROPOLITAN NASHVILLE-DAVIDSON COUNTY, TENNESSEE

**APPENDICES
TO
THE 2022-2023 ANNUAL UPDATE
FOR
PROGRAM YEAR FIVE**

For the period June 1, 2022 – May 31, 2023

Prepared by:

Metropolitan Development and Housing Agency
701 South Sixth Street
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On Behalf of:

The Metropolitan Government of
Nashville and Davidson County

FINAL – MAY 18, 2022



The 2022-2023 Annual Update

(2022 Action Plan) Program Year Five

APPENDICES

Appendix A – HOME Resale/Recapture Provisions

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

Appendix C – Summary of Consultations Comments and Responses

Appendix D – Public Notices

Appendix E – Summary of Public Comments and MDHA Responses

Appendix F – Fair Housing Plan

Appendix G - Summary of 2022 Action Plan Priorities

APPENDIX A

HOME RESALE/RECAPTURE PROVISIONS

I. BACKGROUND

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

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

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

II. DEFINITIONS

- Development Subsidy – a development subsidy is defined as financial assistance

provided by MDHA as the HOME program administrator to offset the difference between the total cost of producing a housing unit and the fair market value of the unit. When provided independently and absent any additional subsidy that could be classified a direct subsidy, development subsidy triggers resale.

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

III. PERIOD OF AFFORDABILITY

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

a. Period of Affordability Under Resale Provisions

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

b. Period of Affordability Under Recapture Provisions

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

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

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

IV. RESALE PROVISIONS

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

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

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

a. Applicability

MDHA has chosen to use Resale Provisions for all HOME-assisted homebuyer units in order to preserve the affordable housing stock. Thus, any HOME assistance, development or direct subsidy to the homebuyer, will trigger the use of Resale provisions. This decision is predicated by the loss of 20% (18,000 units) of the affordable housing stock since the year 2000 based on the “House Nashville” housing report issued by the Mayor’s office in May 2017 and the fact that home prices in Metro

Nashville-Davidson County continue to escalate.

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

b. Effect

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

c. Fair Return on Investment

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

MDHA shall consider a fair return on investment achieved when the original

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

Calculating Fair Return on Investment – EXAMPLE

1. Down payment: The original homeowner put down \$1,000 earnest money at the signing of the sales contract.
2. Cost of Capital Improvements: The original homeowner had a permitted, inspected, fence installed at a cost of \$1,500; has receipts to document the cost and a visual inspection confirms the fence exists.
3. Percentage of Change: The original purchase price for the home was \$150,000 and the amount of HOME subsidy invested in the unit was \$25,000. Additionally, the home received Barnes Funds requiring a 20-year affordability period.

For the purposes of using the HPI calculator, the home was purchased in the 3rd Quarter of 2014, and will be calculated using the 3rd Quarter of 2020. Using the HPI calculator, the house would be worth approximately \$247,000.

Calculating the Fair Return to the Original Owner:

Downpayment:	\$1,000
Capital Improvements	\$1,500
Increase in value per HPI:	<u>\$97,000</u>
	\$99,500 Fair Return on Investment

In order to realize a fair return to the original homeowner, the sales price must be set at roughly \$249,500 (i.e., \$150,000 + \$1,000 down payment + \$1,500 capital improvements + \$97,000 HPI increase = \$249,500).

The seller must have the sales price approved by MDHA. Additionally, MDHA must verify that the new homebuyer is income eligible. If the resale price necessary to provide a fair return to the seller is not affordable to the subsequent lower income homebuyer, MDHA may provide additional HOME assistance, if it's available as an eligible activity in the Action Plan. If additional HOME assistance is provided, the affordability period will start over.

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

d. Continued Affordability

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

e. Imposing Resale Provisions

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

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

f. Foreclosure

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

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

V. RECAPTURE PROVISIONS

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

a. Applicability

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

b. Effect

If a homeowner chooses to sell or use the property for non-eligible HOME Program activities during the Period of Affordability, the full amount of the HOME Program Direct Subsidy (specifically excluding the amount of any Development Subsidy) shall be recaptured and repaid to MDHA provided that net proceeds are sufficient. MDHA may

choose to forgive a portion of the HOME Program Direct Subsidy subject to recapture on a pro-rata basis over the affordability period. If net proceeds are insufficient to repay the total HOME investment due, only the actual net proceeds will be recaptured. In the event that net proceeds are zero (as is usually the case with foreclosure), the recapture provision still applies, but there are no funds to recapture. Recaptured funds shall be returned to the MDHA HOME Trust Fund to be reinvested in other affordable housing for low to moderate income persons.

c. Imposing Recapture Provisions

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

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

d. Foreclosure

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

Consequently, homebuyer housing with a Recapture Provision is not subject to the

affordability requirements after MDHA has recaptured the HOME funds in accordance with its written agreement. If the ownership of the housing is conveyed pursuant to a foreclosure or other involuntary sale, MDHA shall attempt to recoup any net proceeds that may be available through the foreclosure sale. MDHA is subject to the limitation that when there are no net proceeds or net proceeds are insufficient to repay the HOME investment due, MDHA may only recapture the actual net proceeds, if any.

VI. REFINANCING POLICY

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

It is MDHA's policy to approve subordination requests when the following conditions are met:

1. The refinancing must be necessary to reduce the owner's overall housing costs,
OR
2. The refinancing must otherwise make the housing more affordable, AND
3. CLTV with new debt is 80% or less.
4. Debt Service Coverage Ratio (DSCR) ratio with new loan is 1.15 or above.
5. MDHA will not subordinate to refinancing for the purpose of taking out equity unless the funds are being used for property repairs and improvements as outlined in 6.
6. Cash out will be used for property repairs or improvements and pay closing costs associated with new loan contingent on the following:

All work will be done by licensed, insured contractors.

Construction funds held in escrow by lender or Title Company and disbursed only after inspection of property documents work has been completed.

If property is occupied, existing tenants will remain in occupancy with no change in lease terms. Property owner will bear all expense associated with temporary relocation of tenants if it is necessary due to the extent of repairs.

7. The subordination is necessary for the project to convert construction financing to permanent financing with no increase in debt. Requests of this nature do not require review or recommendation from the MDHA Loan Review Committee.

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

When requests of this type are received, Community Development (CD) staff will obtain the subordination document from the Lender and prepare correspondence stating the request meets MDHA guidelines and forward these to MDHA Legal Counsel for review and approval. The CD Director shall be copied on all correspondence. MDHA Legal Counsel will forward the subordination document to the MDHA ED for signature once they approve it.

MONITORING RESALE & RECAPTURE PROVISIONS

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

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

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

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

VII. APPROVAL OF CHDO & SUBRECIPIENT PROVISIONS

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

APPENDIX B

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

Compilation of Single Family New Construction Real Estate Sales (defined as closed sales on units constructed in 2020 and 2021) for a 3-month period October 2021 – December 2021

Month	Unit Type	Sales Volume	Median Price Based on 95%
October 2021	Single Family - New Construction	20	\$436,905.00
November 2021	Single Family- New Construction	21	\$430,825.00
December 2021	Single Family – New Construction	14	\$413,250.00
	Average Volume & Median Sales Price for Months reviewed	55	\$426,993.00

Sales Volume for Single Family New Construction Units is less than 250 sales per month so 3 months' worth of sales data is required per HUD guidelines to establish a median sales price based on local data of **\$426,993.00**.

HUD New Home Construction Single Family Limit effective June 1, 2021 - \$280,000 – median prices listed above for each of 3 months reviewed exceed this limit.

Compilation of Single Family Existing Real Estate Sales for 1-Month Period December 2021

Month	Unit Type	Sales Volume	Median Price Based on 95%
December 2021	Single Family – Existing	766	\$451,250.00

Sales Volume for December 2021 exceeds the required 500 volume of sales per month; therefore, December 2021 sales data was utilized to establish a median sales price per HUD guidelines based on local data of **\$451,250**.

HUD Existing Home Single Family Limit effective June 1, 2021 - \$280,000 – median prices listed for December 2021 exceeds this limit.

Average Median Sales price for New Construction and Existing Construction is \$439,122.

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

APPENDIX C

SUMMARY OF CONSULTATIONS, COMMENTS AND RESPONSES

Introduction

The MDHA Consolidation Plan Meetings were held in three sessions virtually via Zoom due to continuing COVID-19 concerns. A total of 27 stakeholders registered across the three meetings, representing a total of 10 organizations (excluding MDHA) and 1 individual.

- Consultation - Affordable & Fair Housing - Thursday, January 13, 2022 – 2:00 to 3:00 p.m.
- Consultation - Homelessness & HOPWA - Wednesday, January 19, 2022 – 10:00 – 11:30 a.m.
- Consultation - Non-housing Community Development - Thursday, January 27, 2022 – 10:00 – 11:30 a.m.

MDHA staff also developed an online survey using questions from the Consolidated Plan. The results were tallied via the Survey Monkey tool and results are included for each topic. During the virtual sessions, stakeholders were able to ask questions of the MDHA staff and gain clarity on survey questions.

Sessions were facilitated by Tifinie Capehart Consulting and Girl Friday Business Solutions.

Format of the Summary Report:

Each section provides the following:

- A. Summary of the conversation for that session and major themes.
- B. Follow-up items for MDHA
- C. Questions and Responses/Discussion Summary from the Virtual Meeting
- D. On-line survey results from registered participants.
- E. On-line survey results, general responses from non-registered firms/individuals on Constant Contact List.

Stakeholder Contact List:

List of stakeholders and their contact information.

List of MDHA Staff members on the calls.

Full Zoom Call transcripts (Chat Box and Meeting Audio Transcribed) are being kept on file at MDHA and will be made available upon request.

Session 1: 2022 Action Plan Consultation: Affordable Housing & Affirmatively Furthering Fair Housing, January 13, 2022

Analysis:

There were 12 stakeholders present on the virtual call, and 17 stakeholders completed the online survey. There were also 7 MDHA staff on the call and 1 Promise Zone Vista. During the Affordable Housing discussion this year, the stakeholders emphasized the increase in demand for affordable housing, due to rising housing costs, and how past barriers are now exacerbated by the increase in need. For instance, there was discussion about how Landlords can think more creatively on screening practices for non-traditional applicants in need of housing. Discussion during this session also included ideas on how to incentivize more affordable housing; for example, a tax category that identified a property as an affordable housing inventory / land use, and as such, would be taxed at a different rate from market rate properties.

Funding Opportunities and/or Follow Up items for MDHA

1. Review the application process for MDHA housing to improve efficiency.

MDHA RESPONSE:

Confusion over each property having its own application process:

MDHA transitioned from group waiting lists to individual waiting lists to give those in need more affordable housing opportunities. This allows us to: 1) open waiting lists on a monthly basis, (previously, it was once every several months) so those in need have an opportunity to apply for housing now. 2) those in need can apply for multiple waiting lists, giving them multiple opportunities to be called. In addition, the group waiting lists didn't give applicants an option. Individual waiting lists, which we started in 2016, gives applicants an opportunity to apply for the property/properties in which they are interested in.

Lack of education:

In June 2020, we tweaked our waiting list pre-application so that it is less strenuous and time consuming for the applicant. Many applicants are now able to complete the pre-application in less than 15 minutes.

Waiting list openings are announced a week in advance on MDHA's website and social media. Staff also share the waiting list openings ahead of time via email to approximately 700 email addresses. We also send waiting list information to the media, which they usually announce for us as well.

We include a Frequently Asked Questions (FAQ) document for all of our voucher applications. We are working on updating the sample application document for our Affordable Housing Department's waiting list openings, which will inform applicants of the information needed when they apply. We are confident this will help applicants who might have questions about the waiting list application.

Announcements for wait list openings for individual properties provide a phone # and instructions that applicants may call if they need assistance with the application process. We also make staff available on the first day of the waiting list opening to apply for applicants who are unable to do it on their own.

Website getting bogged down during waiting list openings:

We have taken measures to prevent the waiting list from getting bogged down during waiting list openings. One of the ways that we've tackled this is by creating a landing page that directs visitors directly to the waiting list or to the website. Since doing this, we have not had any problems with the website running slow. We are also in the process of creating a new MDHA website. It is expected to be complete in the next year.

Time frame once someone gets a call from a waiting list; security deposit information:

The time frame once someone gets a call from the waiting list and moves in will vary depending on the applicant. If an applicant has all of their documents, they could be moved in within five and 10 business days, based on the verification process. If we are still waiting on a specific document, staff will reach out to the applicant and remind them of the document/documents they still need to turn in. We try to move everyone in within 20 days from initial contact to avoid affordable housing units from being vacant for more than 30 days.

We do reach out to five people on the waiting list each time we have an upcoming available unit, and that is so we are prepared to fill that unit in a timely manner. Often times, it takes us reaching out to several applicants to find one applicant still interested in housing. This could cause someone who was contacted to wait longer than expected, as someone ahead of them on the list also expressed interest in moving into housing. We do apologize for this inconvenience, but it is our way of making sure we are being good stewards of affordable housing and not leaving vacant units open for more than 30 days.

When we first reach out to someone on the waiting list, we make several attempts via email and by phone. If we do not hear from them within 72 hours, we reach out to them once more and give them 10 days to respond before we remove them from the waiting list.

Security deposits are driven by a resident's calculated rent, which is 30% of their adjusted income. The deposit is equal one month's rent. Unfortunately, we are unable to provide an exact amount until we verify all of their information.

Security deposits are driven by a resident's calculated rent, which is 30% of their adjusted income. Unfortunately, we are unable to provide an exact amount until we verify all of their information.

Question and Responses/Discussion Summary from the Virtual Meeting:

Q1: Brainstorm the top barriers to affordable housing in Nashville-Davidson-County and why?

1. Land costs and affordable housing being taxed like market rate housing; affordable housing providers are consistently challenging appraisals
2. Increase in investor development, e.g., significant capital being used to buy inventory and land that can otherwise be utilized for affordable housing
3. Market conditions; lack of supply has driven up home and land prices
4. Lack of capital for nonprofits to scale
5. No flexibility in qualifications for non-traditional applicants, e.g., credit score, criminal records, past evictions are barriers

Q2: When addressing affordable housing in Nashville-Davidson County, what should be the priorities; in terms of a) activities and b) sub-populations?

Q2.a: Activities

1. More coordination between for profit and nonprofit developers
2. Streamlined codes and approval process for affordable housing providers
3. Landlord assistance; programs and training that assist landlords with screening and accepting non-traditional applicants
4. New unit creation

Q2.b: Sub-populations

1. Sex Offenders Population; its' very difficult for this population to find housing and then they go into homelessness
2. Homeless
3. Families with children (i.e., create units with more than 1 bedroom)
4. Continue to target moderate to low-income populations

Q3: Which areas do you think funds should be targeted? (e.g., near transit, high-density residential areas, low-density residential areas)?

1. Areas near transit
2. Areas near major employers that hire people with limited experiences and

challenging backgrounds, e.g., North East (Brick Church Pike area, Whites Creek Pike/Briley), East/South East (Old Hickory, Antioch, La Vergne), Central City (Downtown, Mid Town)

3. Low density areas, to increase walkable density
4. Areas with largest population growth

Q4: What suggestions do you have for improving knowledge about fair housing and removing barriers to housing opportunities in Nashville-Davidson County?

1. Requiring all recipients of federal or local housing funding to attend a training on Fair Housing
2. Affordable Housing Fair to educate people on programs and assistance available
3. Do more education at the State level on Inclusionary Zoning and the need for dedicated affordable housing within a growing market
4. Create consistent talking points on affordable housing and fair housing, for non-profits, PR professionals, and media to consume and share
5. Create a one-stop-shop or website to locate affordable housing resources and available units
6. Educate elected officials on affordable housing and fair housing

Q5: How can MDHA increase the effectiveness of its housing programs, other than an increase in funding?

1. Improve the application process, e.g., eliminate first come first serve (working residents have a difficult time with this), eliminate unnecessary paperwork and shorten wait times.
2. Fully participate in the coordinated entry process for all of its units, not just a few Section 8 programs.
3. Increase social media presence, telling stories of residents, giving them a narrative, more brand awareness
4. Advocate for and pursue rezoning initiatives with elected officials for density and housing in addition to advocating for inclusionary zoning and advocate for changing state laws to prevent discrimination against those who have Section 8 vouchers

Additional comments from transcripts pertaining to affordable housing priorities/barriers:

All types of housing, transitional and recovery housing should be a priority. Agencies providing this type of housing currently can't access CoC and ESG resources because of HUD's priority of "Housing First" with housing not being tied to any conditions and permanent rather than

transitional housing.

MDHA 2022-2023 Action Plan Online Survey for Affordable Housing and Affirmatively Furthering Fair Housing

Q1 Brainstorm the top barriers to affordable housing in Nashville-Davidson-County and why?

Answered: 17 Skipped: 0

#	RESPONSES	DATE
1	Developers are given free reign to make luxury homes instead of being required or incentivized to make affordable homes. MDHA does not issue enough vouchers, and makes it unattractive and difficult for properties to accept vouchers. (Should be HEAVILY incentivized and streamlined.) MDHA doesn't have enough affordable properties. MDHA property application and certification system is disorganized and inaccessible.	2/18/2022 10:02 AM
2	lack of units - especially one bedroom units as my agency often works with single individuals. Lack of landlords willing to overlook minor criminal offences that often one can have due to experiencing homelessness such as trespassing, public intoxication due to not having a residence, and so on that would not exist had the person had a place to call home. Low income units are consistently being sold to developers and the like, which in turn are flipped, and the rent becomes two times, three times, often more expensive than it was before the developer was involved in the property.	2/15/2022 12:10 PM
3	Cost of land Cost of materials lack of adequate subsidies in this NEW age of higher costs Slowness of the city to oversee their departments responsibilities Credit issues of low income buyers.	2/14/2022 1:30 PM
4	1.Out of town investors - buying up affordable stock 2.Single Family Rentals at market rate 3. Lack of partnership between funding agencies of nonprofit developers and for profit developers	2/14/2022 12:19 PM
5	From a resident's perspective, it's the lack of available affordable housing. From a developer's perspective, it's the challenging road to building capacity to lack of access to capital and partners willing to take on a mentoring role with small non profit developers.	2/14/2022 12:03 PM
6	lack of units, insane housing costs, we need more Section 8 locations, barriers to housing like criminal records.	2/14/2022 11:14 AM
7	Amount of tax credits distributed and who they are given to High cost of land; sprawled development NIMBYism; people not wanting to live next to low-income residents No transient oriented development, Lack of efficient transportation options Building codes not designed for higher density yielding low density projects, not as sustainable Large council size, not efficient decision making	2/14/2022 11:00 AM
8	Gentrification Low supply driving prices up Insufficient public transportation	2/14/2022 10:15 AM
9	1) lack of units 2) willingness of developers to include AH units in new projects 3) lack of infrastructure to support greater density	2/14/2022 9:46 AM
10	The availability of land to build on; racial inequities in the housing market; a sufficient pool of experienced developers of affordable housing (this includes the development of capacity among non-"usual suspect" developers in the nonprofit sector); the persistent failure, on the part of the city, to ensure that out-of-town commercial developers and corporations invest in Nashville's affordable housing market (compulsary measures, not hollow incentives).	2/14/2022 9:18 AM
11	Supply & demand, gentrification/displacement, inadequate minimum wage, unaffordable/non-existent childcare, and a lack of accessible housing stock.	2/14/2022 9:09 AM
12	Price and artificial barriers by property mgmt like minimum income, credit and past enough	2/14/2022 8:23 AM
13	Land that already has services and is properly zoned; competition for land with for profit developers who have deeper pockets; NIMBY-ism	2/14/2022 8:23 AM
14	Increase in investor development, increase in housing cost and insufficient affordable housing funding.	2/14/2022 7:23 AM
15	Lack of affordable housing units. MDHA's unwillingness to dedicate public housing (or	2/13/2022 10:12 PM

MDHA 2022-2023 Action Plan Online Survey for Affordable Housing and Affirmatively Furthering Fair Housing

equivalent) units and/or prioritize people experiencing homelessness for public housing (or equivalent) units even though there is a Coordinated Entry system willing to do the work for you. Income verification restrictions (3x the rent). Discrimination against people who have been evicted or have criminal histories. Discrimination against people using housing subsidies or vouchers. Outright discrimination based on protected classes.

16	The screening process . The criteria . Lack of welcoming diversity.	2/13/2022 8:13 PM
17	Availability Barriers-criminal offense, credit Complicated applications and lack of access to technology	2/13/2022 5:29 PM

MDHA 2022-2023 Action Plan Online Survey for Affordable Housing and Affirmatively Furthering Fair Housing

Q2 When addressing affordable housing in Nashville-Davidson County, what should be the priorities (in terms of activities and sub-populations).

Answered: 16 Skipped: 1

#	RESPONSES	DATE
1	Making the current systems and services more organized and functional (property application process, management, social services, upkeep, communication, all need help). Prevention of homelessness. Senior housing should start at age 52 and there should be more of it. More housing opportunities for people with disabilities.	2/18/2022 10:02 AM
2	More units, more landlords working with the low barrier collective, and changing policy within the state to where someone cannot be discriminated against due to having a Section 8 voucher.	2/15/2022 12:10 PM
3	Streamlined city codes and planning system to help us reduce cost and lost time Access to cute land by non-profit's System to encourage for profits' to build a few Affordable units in each development System to match for-profits with capable non-profits.	2/14/2022 1:30 PM
4	1. Funding and. Strategic partnerships between for profit and nonprofit developers 2. Moratorium on put of town investments 3. Increased building and education in diverse communities	2/14/2022 12:19 PM
5	Construct housing that can serve a broad range of those in need, once in place and available, allocation and/or customization to an extent to serve sub-populations can addressed.	2/14/2022 12:03 PM
6	We completely leave out an entire population of people. It is nearly impossible to help get people on the sex offender registry housed. They are therefore forced into homelessness as there is no housing that will accept them.	2/14/2022 11:14 AM
7	Building mixed use subsidized housing for low income and and families on large average land trusts to establish a community Historic preservation of Black communities and the culture, slowing displacement Investing in non profits and advocacy groups dedicated to housing solutions Temporary housing (3 month-9month, esp in winter) to get residents off the street and housed—> could be renovation of vacant/older motels, easy bus transportation etc..	2/14/2022 11:00 AM
8	Access to high quality jobs Protect existing supply Zoning to increase density Down payment assistance Assistance with property taxes	2/14/2022 10:15 AM
9	1) start building more units 2) reduce barriers/requirements when applying for housing, invest in wraparound services 3) incentivize developers to include % of AH units 4) ensure all public housing information is communicated in English, Spanish, and Arabic	2/14/2022 9:46 AM
10	Ensuring racial equity in Nashville's housing market; developing capacity among smaller, newer developers of affordable housing, especially minority developers; preventing evictions and providing people experiencing homelessness sufficient affordable housing options so they don't feel that they have no choice but to live in encampments and other places not fit for human habitation.	2/14/2022 9:18 AM
11	Housing for families, people with disabilities, and the homeless should be prioritized. Generally, there is a lack of housing for 3+ bedroom units which makes it difficult for larger families to find suitable units. There should be a focus on building affordable housing with more bedroom counts. While all new building constructed must comply with Fair Housing Design Standards, we are seeing many new builds that are not actually in compliance (no accessible parking at amenities, spatial requirements not satisfied, etc). It would be great if MDHA and THDA would develop an enforcement section to review new construction to ensure basic standards are met.	2/14/2022 9:09 AM
12	Direct assistance to people facing housing insecurity. Financial and help navigating systems	2/14/2022 8:23 AM
13	The homeless are the top priority so Nashville does not become LA or Portland, then transitional, then rental, then homeownership. Land and funding for these purposes needs to be set aside as part of these corporate recruitment packages. The related priority is transportation.	2/14/2022 8:23 AM

MDHA 2022-2023 Action Plan Online Survey for Affordable Housing and Affirmatively Furthering Fair Housing

14	Continue developing and partnering with affordable housing developers targeting low and moderate income individuals and families.	2/14/2022 7:23 AM
15	Dedicating units to people experiencing homelessness across all programs.	2/13/2022 10:12 PM
16	Chronically homeless Felons	2/13/2022 5:29 PM

MDHA 2022-2023 Action Plan Online Survey for Affordable Housing and Affirmatively Furthering Fair Housing

Q3 Which areas do you think funds should be targeted? (e.g., near transit, high-density residential areas, low-density residential areas).

Answered: 17 Skipped: 0

#	RESPONSES	DATE
1	Definitely near transit. And/or push for transit to extend to these areas.	2/18/2022 10:02 AM
2	More mixed-income areas, more units available to those with vouchers and/or other low-income situations, more public transit with affordable units near.	2/15/2022 12:10 PM
3	Density HAS TO increase to create affordable. But the city does not involve others in how this can be done. There is no valid transit to make this option that viable.	2/14/2022 1:30 PM
4	Transportation and low density residential	2/14/2022 12:19 PM
5	low-density residential areas and near transit	2/14/2022 12:03 PM
6	near transit.	2/14/2022 11:14 AM
7	Medium to High density areas, increasing the missing middle (not just high rises, quad plexes, small multi family on top of shops) Areas along main corridors (Murfreesboro pk, Charlotte pk, Nolensville pk)	2/14/2022 11:00 AM
8	High density residential areas	2/14/2022 10:15 AM
9	High density & areas with greatest percentage of eviction cases.	2/14/2022 9:46 AM
10	Housing developed along transit corridors; projects that promote shared equity among inhabitants/developers; projects that promote equity in the city's housing market generally; housing developed by smaller nonprofit developers, as well as projects involving partnerships between smaller, less-experienced developers and well-established developers, for-profit and otherwise.	2/14/2022 9:18 AM
11	Funds should be targeted where there is the most population growth. With the ever-growing population of Nashville the housing prices have gone up which causes displacement. We need to focus on providing affordable housing in the high-density residential areas, to have sufficient housing for the quantity of people that need housing and can no longer afford it. It would be nice to see more neighborhood housing and the availability of more Section 8 Housing Choice Vouchers. I am a fan of the mixed-income housing developments.	2/14/2022 9:09 AM
12	Serving families and low income individuals	2/14/2022 8:23 AM
13	Near transit, with expanded transit hours. But again, near transit is popular to for-profit developers, too, so land needs to be set aside for affordable housing, those working in our hotels and warehouses and schools and hospitals.	2/14/2022 8:23 AM
14	All areas should be targeted as Nashville-Davidson County population growth requires it.	2/14/2022 7:23 AM
15	Areas near major employers that hire people with limited experiences and challenging backgrounds. I'm thinking the Brick Church Pike area, Whites Creek Pike/Briley, the airport area, Rayon City, the Antioch area all the way to the border with La Vergne, the downtown core, and Midtown. We should then work with the city to bring needed resources like transit, grocery stores, and healthcare to those same areas, not the other way around.	2/13/2022 10:12 PM
16	Low density to improve mobility. Then transit areas.	2/13/2022 8:13 PM
17	Near transit	2/13/2022 5:29 PM

MDHA 2022-2023 Action Plan Online Survey for Affordable Housing and Affirmatively Furthering Fair Housing

Q4 What suggestions do you have for improving knowledge about fair housing and removing barriers to housing opportunities in Nashville-Davidson County?

Answered: 16 Skipped: 1

#	RESPONSES	DATE
1	Workshops with incentives for landlords to have a better understanding of what it means to take in someone who happens to have a Section 8 voucher. Changing of laws to prevent discrimination statewide against those who have vouchers.	2/15/2022 12:10 PM
2	WE donot see fair houing/descrimitaion in our expereince. the only thing that makes it hard for POC to buy a home is the same thing that makes it hard for whites to buy homes.- too many investors with lots of cash who close quickly. this causes todays discrimination.	2/14/2022 1:30 PM
3	Increased education on shared equity programs. Increased strategic partnership building, municipal and governmental funding for education programs on affordable housing to communities (negating NIMBYism)	2/14/2022 12:19 PM
4	Host an affordable housing fair to educate the community on all things housing to include Section 8, Senior housing, Housing Repairs, etc. There have been extensive housing challenges over the past two years with natural weather occurences and COVID-19. Residents are still coping with those as it relates to fair housing and housing opportunities.	2/14/2022 12:03 PM
5	podcasts, pamphlets, articles, an educational spot during the evening news, radio, facebook, we need to educate folks.	2/14/2022 11:14 AM
6	Mailers directly to residents/homeowners Open town halls Informational Community block parties/events	2/14/2022 11:00 AM
7	Teach the history of discrimination and the story of how we are in the present situation Share best practices and examples from other cities that have been successful	2/14/2022 10:15 AM
8	Use the position of power that MDHA has to advocate for inclusionary zoning to the state. Educate state legislature on the pace of growth in Nashville and the private housing market's inability to keep up with affordable housing.	2/14/2022 9:46 AM
9	Make processes for leveraging TIF and other funding opportunities more transparent; more transparency generally; share power instead of always hoarding it.	2/14/2022 9:18 AM
10	To improve knowledge about fair housing I would suggest that MDHA have the TN Fair Housing Council present to leasing agents and property managers about basic rights under the Fair Housing Act. Many barriers to housing have to do with the lack of legal assistance-- too many tenants do not have the financial resources to secure legal help when Landlords violate the Uniform Residential Landlord Tenant Act. More education is needed for real estate professionals-- I'm talking private landlords, leasing agents, property managers, maintenance staff, and codes departments.	2/14/2022 9:09 AM
11	Talk with people facing eviction directly to identify barriers	2/14/2022 8:23 AM
12	I think the power of individual councilmembers needs to be counterbalanced with overall city priorities.	2/14/2022 8:23 AM
13	Educating all housing providers about fair housing laws.	2/14/2022 7:23 AM
14	Requiring all recipients of HUD or city housing funding to attend a training on more than just the basics of fair housing. Not depending on the lengthy HUD administrative process for housing discrimination claims, but the development a faster, local option to work alongside it. Financial incentives for the number of households retained (and not evicted or pushed out) under funded programs.	2/13/2022 10:12 PM
15	EDUCATE and ORGANIZE RESOURCES for landlords.	2/13/2022 8:13 PM

MDHA 2022-2023 Action Plan Online Survey for Affordable Housing and Affirmatively Furthering Fair Housing

Q5 How can MDHA increase the effectiveness of its housing programs, other than an increase in funding?

Answered: 17 Skipped: 0

#	RESPONSES	DATE
1	Make your current programs and services more functional and accessible and attractive.	2/18/2022 10:02 AM
2	Changing laws: There is nothing to protect renters from being discriminated against due to having a voucher. Doing outreach towards landlords so they can have their questions answered and a better understanding of various incentives available to them.	2/15/2022 12:10 PM
3	Stop being afraid of HUD!! They are bullies. Congress only gives HUD \$\$ so HUD can crate housing for lower income not so HUD can create ways to make this housing close to impossible to create.	2/14/2022 1:30 PM
4	Increased education on shared equity programs. Increased strategic partnership building, municipal and governmental funding for education programs on affordable housing to communities (negating NIMBYism)	2/14/2022 12:19 PM
5	Get to the grass roots level and/or partner with non profits who are on the ground.	2/14/2022 12:03 PM
6	Either speed up, or eliminate some of the paperwork and waiting time.	2/14/2022 11:14 AM
7	Transparency in the process, where is the Envision Napier process? Communication of NashvilleNext and how MDHA fits In INCREASED SOCIAL MEDIA PRESENCE, Telling stories of residents, giving them a narrative More brand awareness	2/14/2022 11:00 AM
8	Ensure that MDHA housing blends in with the neighborhoods they are in. When it is obvious MDHA housing, it is stigmatizing. Increase supply.	2/14/2022 10:15 AM
9	Improve the application & communication process for people seeking public housing.	2/14/2022 9:46 AM
10	Restructure the agency so that the development of affordable housing and the promotion of downtown development fall under the auspices of separate entities. Adopt a racial equity lens and pro-BIPOC values and apply them to all agencies policies and practices. This includes undergoing regular and in-depth anti-racism training.	2/14/2022 9:18 AM
11	Leasing agents need training from the legal department on detainer warrants and when management should accept rent. Leasing agents need training on Reasonable Accommodations and Reasonable Modifications. MDHA should come up with a system-wide approach to tracking these requests, so they are not lost, and so that property managers know where to put these requests, and to check the list of requested accommodations when units become available. MDHA should work to make "source of income" a protected class under local housing laws, so that landlords cannot refuse to accept Section 8 Housing Choice Vouchers. Alternatively, MDHA could offer some other type of incentive to make the acceptance of Section 8 vouchers more appealing. Lastly, the broken-window theory is real, and the opposite is also true. MDHA should make aesthetic improvements to the exterior of their older properties to encourage the community to take better care of the properties. Landscape improvements could be a first step.	2/14/2022 9:09 AM
12	Focus on public housing instead of minimizing "risk" to private landlords and property managers	2/14/2022 8:23 AM
13	I think MDHA does a really great job so I have no comments on this question.	2/14/2022 8:23 AM
14	Advocate for it to become law that investors include a significant number of affordable housing units with their development.	2/14/2022 7:23 AM
15	Fully participate in the coordinated entry process for all of its units, not just a few Section 8 programs.	2/13/2022 10:12 PM
16	Provide quicker responses Continued resources, and stability.	2/13/2022 8:13 PM

On-line survey results from general responses from non-registered firms/individuals on Constant Contact List – 38 Responses

Online Survey for Housing and Community Development

Q2 What do you believe are the top barriers to affordable housing in Nashville-Davidson-County and why?

Answered: 38 Skipped: 0

#	RESPONSES	DATE
1	people	2/21/2022 8:23 PM
2	Background checks and having to make 3x the rent.	2/3/2022 8:44 AM
3	Lack of landlords, all want high-dollar tenants Not enough low-income units being built	2/2/2022 3:15 PM
4	all of those things from the previous question. The system is set up for people to fail.	1/14/2022 12:49 PM
5	Out of town individuals and businesses moving to Nashville (which relates directly to policies), lack of inventory, lack of access to healthy food. People moving here contribute to an already declining inventory and they are receiving tax breaks (businesses) for doing so (some of these businesses then contribute to housing crisis because they demand a certain amount of housing for their own people) and lack of access to resources means that families are limited on where they can move to and in an area already low on affordable housing, families may have to make the choice between rent they can afford and resources they can access.	1/14/2022 11:43 AM
6	The crazy wait lists, income	1/14/2022 10:47 AM
7	Supply and demand. The population growth in Nashville from more expensive areas is driving up housing costs. Additional measures are needed to encourage developers to provide affordable housing.	1/14/2022 10:24 AM
8	Cost of housing because city administration prefers to grow revenues rather than increase affordable units.	1/14/2022 8:58 AM
9	number of properties willing to house persons with challenging credit and criminal justice backgrounds; number of owners willing to include utilities in the rent	1/13/2022 2:24 PM
10	as a developer, access to capital and partners, access to land as a seeker of housing, lack of quality units (inventory) the appearance that there is a lack of sincere commitment to solving the issues	1/13/2022 2:20 PM
11	The amount of space and places that are willing to accept low income	1/5/2022 9:50 AM
12	Lack of inventory caused by Lack of coordination between city, developers and land use.	12/29/2021 10:19 AM
13	not enough affordable units to move clients,	12/28/2021 12:05 PM
14	The price of living is not congruent with the median income for individual.	12/28/2021 11:42 AM
15	SUPPLY IS NOT ENOUGH. NEED MORE, MUCH SMALLER UNITS. PREFERABLY WITH CLOSE WRAP AROUND SERVICES AND CLOSE TO BUS STATIONS.	12/28/2021 11:21 AM
16	Lack of available affordable housing.	12/27/2021 2:26 PM
17	Limited properties, criminal background and crime. There's not enough affordable housing and not enough for those with criminal backgrounds. The crime in low income communities prevents tenants from wanting to live there and the neighborhoods from wanting low income housing in their area.	12/27/2021 8:28 AM
18	Available, affordable housing. Not enough for demand.	12/23/2021 4:03 PM
19	It's just too expensive. Too many people moving from out of state with money we don't have, so landlord know they can charge more	12/22/2021 8:46 PM
20	No low income housing available. Landlords are catering to higher-dollar tenants.	12/22/2021 12:43 PM
21	Misplaced priorities in city and state governance and funding. Misunderstanding or denial of what is actually affordable. Affordable monthly rent for someone making minimum wage is	12/22/2021 9:58 AM

Online Survey for Housing and Community Development

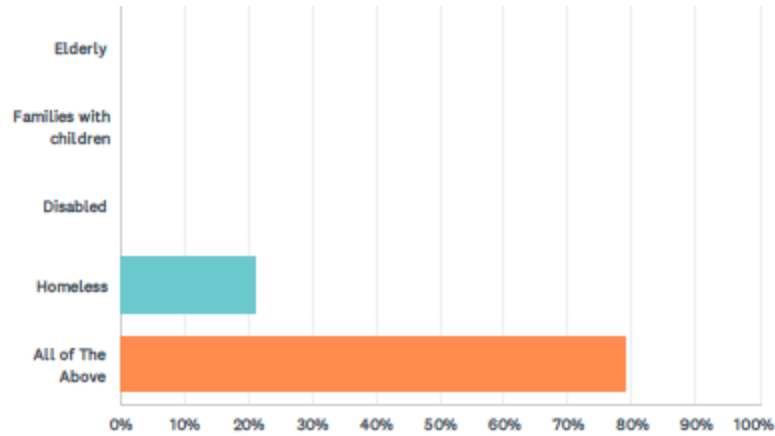
\$400, not \$1000. Affordable rent for someone living on retirement or disability benefits is much lower. Being too slow and not enough volume of units.

22	they have slot of rules the people are are in need slot of time have Criminal records and need more help than what's offered also the waiting period to even get on the list	12/22/2021 9:18 AM
23	Gentrification- affordable housing is being replaced with new developments that are unaffordable	12/22/2021 8:36 AM
24	Need more subsidies. MDHA needs to set aside units for people experiencing homelessness. Not enough \$ put in. Council members don't even show up to meetings about homelessness, that involve the homeless council. Altruism from these council members would be a good start.	12/21/2021 9:57 PM
25	high land cost making new construction oftentimes financially infeasible; high construction costs making new developments financially infeasible; long timelines for zoning/permitting slowing the amount of new units that can be built; NIMBY-ism from public and (sometimes) government officials limiting/inhibiting the amount of new units that can be built; policies that limit density to areas where land costs are largely infeasible; uncertainty surrounding the timeline to receive funds from state/federal/local agencies; preference from local/state agencies of non-profit developers over for-profit developers leading to inefficient leverage of federal funds and fewer units being built; hesitancy to enact progressive policy that has been recommended in various public government documents (notably the most recently from the Mayor's Affordable Housing Taskforce).	12/21/2021 5:34 PM
26	Political will and lack of deferral to subject matter experts	12/21/2021 4:44 PM
27	Family homes being sold out to developers from other states and raising rent prices	12/21/2021 4:15 PM
28	Lack of truly affordable housing, no rent caps, no mandatory inclusionary zoning, landlords renovating and increasing rent in neighborhoods so people are being displaced, not enough Section 8 vouchers or units	12/21/2021 4:08 PM
29	Funding, help for couples with no minors	12/21/2021 3:33 PM
30	Lack of information and understanding in the private landlord community and a lack of prioritization on the part of the city	12/21/2021 3:04 PM
31	Low paying jobs Substance abuse Transportation	12/21/2021 2:56 PM
32	Lack of the physical places where there is affordable housing.	12/21/2021 2:39 PM
33	plentiful jobs of high quality that pay a living wage, with low barriers to employment; excluding people in deep poverty as tenants due to eviction, criminal history or other issues	12/21/2021 2:30 PM
34	Property cost and gentrification	12/21/2021 2:01 PM
35	zoning bylaws, politics, and community economics.	12/21/2021 1:42 PM
36	finances and affordable housing	12/21/2021 1:37 PM
37	availability and low-income-based apartments. It is hard for people with little to no income to rent in this city.	12/21/2021 1:36 PM
38	Insufficient financial incentives for landlords and property developers to create affordable housing opportunities. Like we give tax breaks and incentives for employment, we should also for AFFORDABLE housing for people at or below 50% poverty level.	12/21/2021 1:28 PM

Online Survey for Housing and Community Development

Q3 When addressing affordable housing in Nashville-Davidson County, what should be the priorities in terms of activities and populations served:

Answered: 38 Skipped: 0



ANSWER CHOICES	RESPONSES
Elderly	0.00% 0
Families with children	0.00% 0
Disabled	0.00% 0
Homeless	21.05% 8
All of The Above	78.95% 30
TOTAL	38

Online Survey for Housing and Community Development

Q5 Please Feel Free to Leave Additional Comments Below

Answered: 12 Skipped: 26

#	RESPONSES	DATE
1	There was an entire population of people left out of the meeting, and the survey. It is nearly impossible for housing navigators and organizations that help with housing to find places for people on the sex offender registry. No one will take them, so they remain homeless. They may have committed a crime, but housing needs to be a human right. No one deserves to live outside.	1/14/2022 12:49 PM
2	Not enough accessible housing is available for people with disabilities. Many of the new properties being developed do not comply with basic Fair Housing Design and Construction Standards.	1/14/2022 10:24 AM
3	HOUSING TRANSPORATION HOUSING TRANSPORTATION HOUSING TRANSPORTATION	12/28/2021 11:21 AM
4	The housing first initiative addresses those experiencing homelessness but wrap around care and continued support for the tenant and the community prevents homelessness.	12/27/2021 8:28 AM
5	Currently, MDHA operates wait lists for its affordable housing properties on a first come, first served basis, which immediately places people experiencing homelessness at a disadvantage. This policy should be ended and MDHA should instead commit to filling 50% of vacancies from the Coordinated Entry pool of people experiencing homelessness. We are not asking for new units to be dedicated to those experiencing homelessness, rather new vacancies in current units, and only half of the time. This is more than reasonable, Right now, people experiencing homelessness experience NO preference to move into these subsidized units, and this is unacceptable. The Mayor's Office must be more transparent in its intentions and dealings and bring more people to the table to achieve solutions.	12/23/2021 4:03 PM
6	We need more libraries and community centers, services and programs within those, and for those we have to fully open with longer hours.	12/22/2021 12:43 PM
7	it's amazing that y'all are trying to do better than what you already are there's slot of help here for the ones that truly want it and seek it it's absolutely amazing what some of the programs do for people lives like the salvation army on dickerson pike	12/22/2021 9:18 AM
8	Currently, MDHA operates wait lists for its affordable housing properties on a first come, first served basis, which immediately places people experiencing homelessness at a disadvantage. This policy should be ended and MDHA should instead to commit to filling 50% of vacancies from the Coordinated Entry (Homeless database) pool of people experiencing homelessness. We are not asking for new units to be dedicated to those experiencing homelessness, rather new vacancies in current units, and only half of the time. This is more than reasonable. Right now, people experiencing homelessness experience NO preference to move into these subsidized units, and this is unacceptable.	12/21/2021 9:57 PM
9	All community development priorities are luxuries only the housed can enjoy- the root of the issue is that prices have skyrocketed for rent. Even being paid \$18/hr rent is not affordable. Single parents to multiple children are becoming homeless rapidly. STOP THE BIG DEVELOPER	12/21/2021 4:15 PM
10	People should have access to good rehab with follow up assistance.	12/21/2021 2:56 PM
11	We must add units for people experiencing homelessness.	12/21/2021 2:39 PM
12	We have to stop deprioritizing homelessness. Prioritize homelessness to fill public housing vacancies. Incentivize landlords to accept vouchers from people experiencing homelessness.	12/21/2021 1:28 PM

Session 1: 2022 Action Plan Consultation: Affordable Housing & Affirmatively Furthering Fair Housing, January 13, 2022

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Welton Pride - Promise Zone Vista

Shannan Beauchene - Promise Zone Vista

Session 2: Action Plan Consultation: Homelessness & Housing for Persons with HIV/AIDS Held on January 19, 2022

Analysis:

There were 6 stakeholders present on the virtual call and 6 stakeholders completed the online survey. There were also 6 MDHA staff in on the call and 2 Promise Zone Vista Members.

Funding Opportunities and/or Follow Up items for MDHA

None

Question and Responses/Discussion during Virtual Meeting:

Q1 Prioritize activities to address homelessness with 1 being highest in priority and 4 being lowest in priority.

Stakeholders were asked to prioritize four activities to address homelessness, outreach, emergency shelter and transitional housing, rapid rehousing, and prevention. Based on the survey responses, the activities were ranked in the following order:

1. Prevention and Emergency Shelter and Transitional Housing - on average these activities tied for highest priority.
2. Rapid Re-Housing - on average ranked third as a priority.
3. Outreach - on average ranked fourth as a priority.

It should be noted that during the virtual meeting, Rapid Re-Housing was discussed as a top priority over other activities.

Q2 Prioritize subpopulations to be served by homeless assistance programs with 1 being highest in priority and 6 being lowest in priority.

There were four subpopulations that stakeholders were asked to prioritize to be served by homeless assistance programs; the Chronic Homeless, Veterans, Families, Youth aging out of foster care/state custody, Persons discharged from health care/mental health facilities, and Persons discharged from corrections programs & institutions. Based on the survey responses, the subpopulations were ranked in the following order:

1. Chronic Homeless - ranked as the 1st priority.

2. Persons discharged from corrections programs & institutions - 2nd highest priority.
3. Families - 3rd highest priority.
4. Persons discharged from health care/mental health facilities- 4th highest priority
5. Youth aging out of foster care/state custody - 5th highest priority
6. Veterans - 6th and lowest priority.

Survey respondents and meeting attendees noted that they often see Youth and Veterans as two subpopulations that receive ample amounts of donation and funding. As such they were ranked a lesser priority.

Q3 Prioritize activities to address homelessness for persons with HIV/AIDS with 1 being highest in priority and 4 being lowest in priority.

There were four activities that the attendees were asked to prioritize; STRMU (Short Term Rent Mortgage and Utility Assistance Program), TBRA (Tenant Based Rental Assistance), Permanent Housing Facilities, and Transitional Short Term Housing Facilities. Based on the survey responses, the activities were ranked in the following order:

1. Permanent Housing - ranked as the 1st priority.
2. TBRA (Tenant Based Rental Assistance) -ranked as the 2nd priority.
3. STRMU (Short Term Rent Mortgage and Utility Assistance Program) - 3rd priority.
4. Transitional Short Term Housing Facilities - 4th priority.

Feedback during the virtual meeting noted that STRMU can sometimes act as a safety net for some residents, and the program can get abused. Therefore, support to help residents maintain permanent housing should be a priority.

Q4 List top three barriers to affordable housing for persons/families that are homeless or are at-risk of homelessness:

1. Lack of Affordable Housing units and supply
2. Background checks and Landlord discrimination regarding past felonies, tarnished credit history, and past evictions
3. Difficulty with navigating application process due to lack of intellectual capacity, i.e., difficulty accessing technology and gathering needed documents for applications

Q5 List top three barriers to affordable housing for persons with HIV/AIDS and their families.

1. Lack of adequate health care and mental health support

2. Lack of Affordable Housing units
3. Landlord discrimination and stigma around HIV/AIDS

Q6 Describe the level of coordination for addressing homelessness among the following:

Prior to 2021, the Consolidated Plan Update stakeholder meetings were held in person, and this question was presented in a comparison matrix, which was used to describe the strength of each agency’s coordination with other agencies. In 2021 and 2022, the question was framed so that stakeholders would rank the level of coordination of the agency with other agencies. Similar to 2019 comments, the CoC was amongst the strongest in their coordination, while the other agencies, Mental Health Services/Agencies (2nd Strongest), and Housing Providers (3rd strongest), were noted as having more “Weak” coordination.

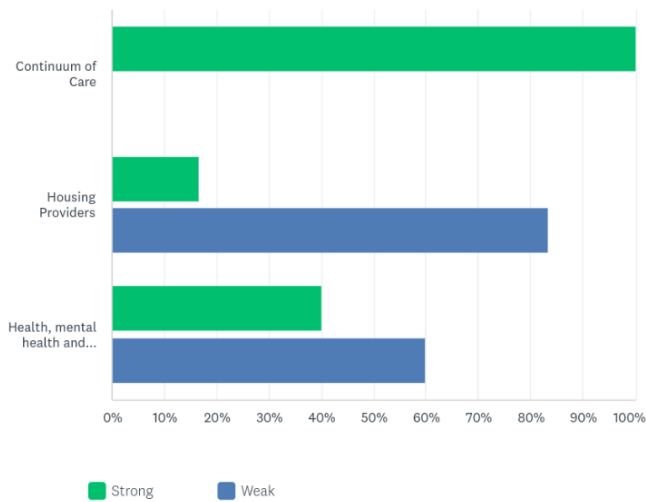
Figure from 2019 Consolidated Plan Update - what was previously completed with in person survey responses:

	Strong	Weak
CoC	IIIIII(7)	I (1)
Housing Providers		IIIIII (8)
Health, mental health & service agencies	III(3) “Fair” (Two mentions)	III (3)
Local & state govt. agencies	I (1) *Fair *Unsure	IIII (4)

Figure from 2022 Survey Results for Question 6 - CoC ranked as having the ‘strongest’ coordination amongst all agencies.

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

Answered: 6 Skipped: 0



	STRONG	WEAK	TOTAL
Continuum of Care	100.00% 6	0.00% 0	6
Housing Providers	16.67% 1	83.33% 5	6
Health, mental health and service agencies	40.00% 2	60.00% 3	5

Q7 Provide one recommendation for increasing coordination for each of the following areas below: 1.) CoC 2.) Housing Providers 3.) Health, Mental Health, and Service Agencies 4.) Local and State Government Agencies

1. CoC -Continue virtual meetings. Considering the Covid 19 Pandemic, the CoC used Zoom virtual technology to host meetings. Stakeholders noted that this was a great tool to get more people to the ‘table’ and enhance coordination. It was more convenient, and it encouraged a variety of people to engage in discussions. This was recommended to keep this as an option for meetings moving forward.
2. Housing Providers
 - a. Continue to share resources.
 - b. Demand more affordable housing units, allocating a certain percentage of MDHA units to people leaving homelessness.
 - c. Do an audit of the application process e.g., waitlists need to be examined, and applications request more information that may be needed or actually used and this is difficult to navigate when clients are on a short timeline to find housing.

3. Health, Mental Health, and Service Agencies
 - a. More housing providers and fewer waitlists.
 - b. Incentivize landlords who provide fewer barriers to housing.
4. Local, State, Government Agencies
 - a. Provide more low income/affordable housing opportunities and funding.

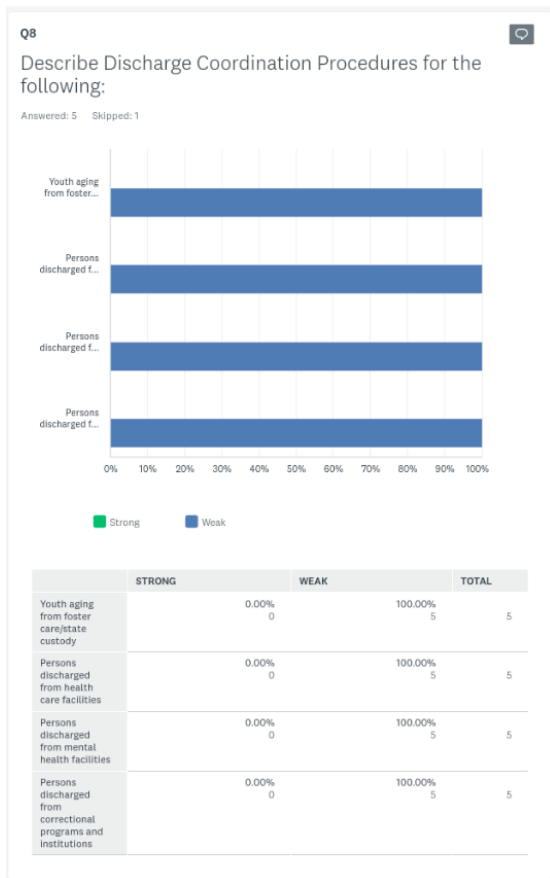
Q8 Describe Discharge Coordination Procedures for the following:

The 2019 - 2020 Consolidated Plan Update stakeholder meetings were held in person, and this question was presented in a comparison matrix, which was used to describe the strength of each agency’s discharge procedures and coordination with other agencies. This year, the question was framed so that stakeholders would rank the level of coordination of the agency with other agencies.

Figure From 2019 Consolidated Plan Update

	Strong	Weak
Youth aging from foster care/state custody		III (3) (Discharge procedures)Nonexistent with foster care With runaways, Oasis does a good job, but they can't do it all.
Persons discharged from health care facilities		IIII (5)
Persons discharged from mental health facilities		IIII (4)
Persons discharged from correctional programs & institutions		IIII (5)

2022 Survey Results for Question 8



The survey data showed that Stakeholders felt that all the agencies could use improvement in their discharge coordination and scored them as all having very weak coordination. This is consistent with the surveys from past years. There was discussion that issues with coordination has been compounded by the Covid 19 pandemic, as the healthcare industry has lost staff, and are overwhelmed with Covid 19 patient care.

Q9 Provide one recommendation for increasing discharge coordination for each of the following areas below: 1.) Youth aging from foster care/state custody 2.) Persons discharged from health care facilities 3.) Persons discharged from mental health facilities 4.) Persons discharged from correctional program and institutions:

Respondents did not provide specific recommendations for each, but noted the following recommendations in general:

- All agencies should be using HMIS/CE as part of the care and discharge process.

- When people are discharged from correctional programs, it would be beneficial to have more job opportunities waiting for them; for e.g. The Contributor is a good place to start.
- Agencies need to use special care with discharging youth, to ensure that they have placement into housing or a program.

Q10 Comments/recommendations regarding past Action Plan discussion of ESG and HOPWA program:

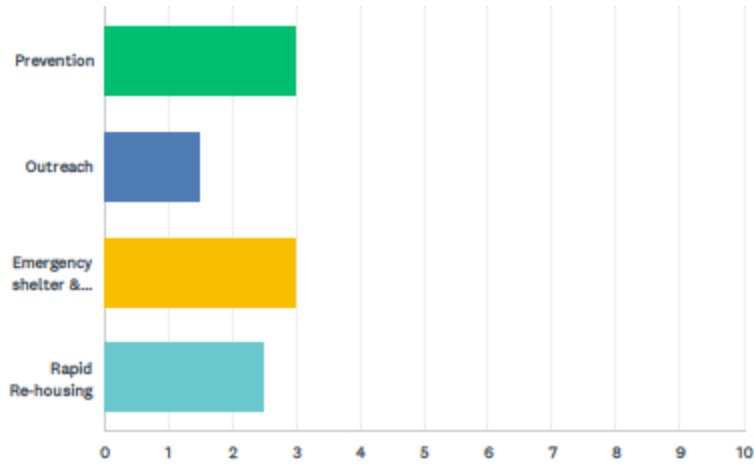
1. It's becoming difficult to impossible to house people who are on the sex offenders' registry. Need more options for them.

[On-line survey results from general responses from non-registered firms/individuals on Constant Contact List – 6 responses](#)

MDHA 2022-2023 Action Plan Online Survey for Homelessness & Housing for Persons with HIV/AIDS

Q1 Prioritize activities to address homelessness with 1 being highest in priority and 4 being lowest in priority.

Answered: 6 Skipped: 0

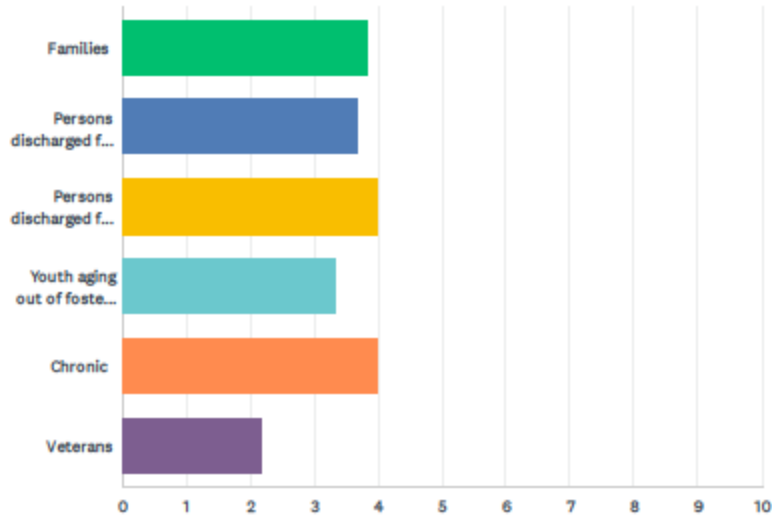


	1	2	3	4	TOTAL	SCORE
Prevention	50.00% 3	0.00% 0	50.00% 3	0.00% 0	6	3.00
Outreach	0.00% 0	16.67% 1	16.67% 1	66.67% 4	6	1.50
Emergency shelter & transitional housing	16.67% 1	66.67% 4	16.67% 1	0.00% 0	6	3.00
Rapid Re-housing	33.33% 2	16.67% 1	16.67% 1	33.33% 2	6	2.50

MDHA 2022-2023 Action Plan Online Survey for Homelessness & Housing for Persons with HIV/AIDS

Q2 Prioritize subpopulations to be served by homeless assistance programs with 1 being highest in priority and 6 being lowest in priority.

Answered: 6 Skipped: 0

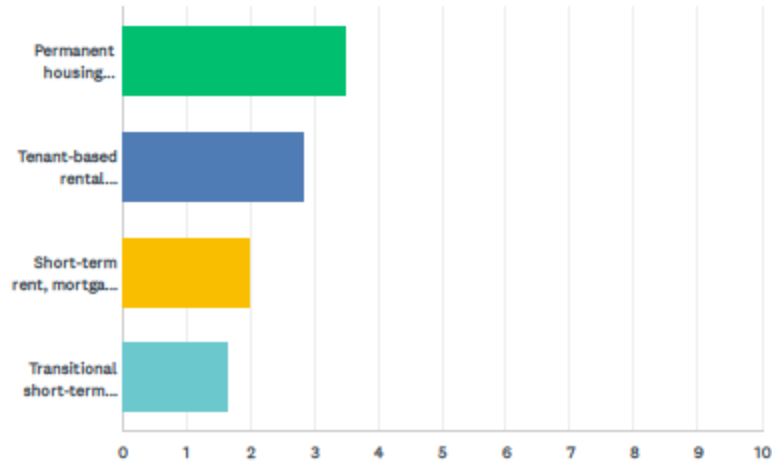


	1	2	3	4	5	6	TOTAL	SCORE
Families	33.33% 2	0.00% 0	16.67% 1	33.33% 2	0.00% 0	16.67% 1	6	3.83
Persons discharged from health care/mental health facilities	0.00% 0	33.33% 2	33.33% 2	0.00% 0	33.33% 2	0.00% 0	6	3.67
Persons discharged from corrections programs and institutions	16.67% 1	33.33% 2	16.67% 1	16.67% 1	0.00% 0	16.67% 1	6	4.00
Youth aging out of foster care/state custody	16.67% 1	16.67% 1	0.00% 0	16.67% 1	50.00% 3	0.00% 0	6	3.33
Chronic	33.33% 2	16.67% 1	16.67% 1	0.00% 0	16.67% 1	16.67% 1	6	4.00
Veterans	0.00% 0	0.00% 0	16.67% 1	33.33% 2	0.00% 0	50.00% 3	6	2.17

MDHA 2022-2023 Action Plan Online Survey for Homelessness & Housing for Persons with HIV/AIDS

Q3 Prioritize activities to address homelessness for persons with HIV/AIDS with 1 being highest in priority and 4 being lowest in priority.

Answered: 6 Skipped: 0



	1	2	3	4	TOTAL	SCORE
Permanent housing facilities	83.33% 5	0.00% 0	0.00% 0	16.67% 1	6	3.50
Tenant-based rental assistance (TBRA)	0.00% 0	83.33% 5	16.67% 1	0.00% 0	6	2.83
Short-term rent, mortgage and utility assistance payments (STRMU)	16.67% 1	16.67% 1	16.67% 1	50.00% 3	6	2.00
Transitional short-term housing facilities	0.00% 0	0.00% 0	66.67% 4	33.33% 2	6	1.67

MDHA 2022-2023 Action Plan Online Survey for Homelessness & Housing for Persons with HIV/AIDS

Q4 List top three barriers to affordable housing for persons/families that are homeless or are at-risk of homelessness

Answered: 6 Skipped: 0

#	RESPONSES	DATE
1	1. Background checks/high-barrier housing 2. Lack of ongoing resources and education in basic activities (budgeting, job searching/interviewing, technology access and know-how..) 3. Lack of unit availability	1/31/2022 11:34 AM
2	lack of availability/places that accept Section 8, rules on background check, lack of necessary documents	1/28/2022 11:46 AM
3	1. Supply of affordable housing 2. Ability to navigate the system in a timely efficient manner/intellectual or technological barrier 3. Record of felony or evictions	1/27/2022 12:18 PM
4	1. There doesn't exist enough affordable housing, public or private 2. There are not enough vouchers available 3. The voucher applications and public housing applications are excessively difficult, and the property managers are difficult to deal with.	1/26/2022 4:21 PM
5	Lack of units, lack of affordable options, stigma.	1/20/2022 1:46 PM
6	1. No trust 2. Waiting list 3. Money	1/20/2022 1:24 PM

MDHA 2022-2023 Action Plan Online Survey for Homelessness & Housing for Persons with HIV/AIDS

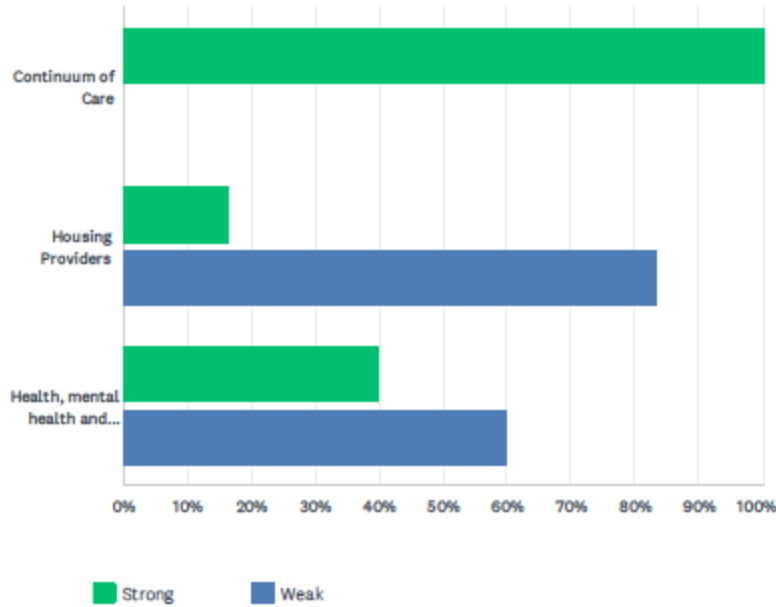
Q5 List top three barriers to affordable housing for persons with HIV/AIDS and their families.

Answered: 6 Skipped: 0

#	RESPONSES	DATE
1	1. Lack of good affordable healthcare coverage 2. See above for general affordable housing barriers that also apply	1/31/2022 11:34 AM
2	n/a I don't work with those with HIV/AIDS so I don't know their unique challenges	1/28/2022 11:46 AM
3	same as above	1/27/2022 12:18 PM
4	Same as above, plus discrimination and cost of healthcare.	1/26/2022 4:21 PM
5	Stigma, lack of units, lack of affordable options.	1/20/2022 1:46 PM
6	I don't know probably the same as above	1/20/2022 1:24 PM

Q6 Describe the level of coordination for addressing homelessness among the following:

Answered: 6 Skipped: 0



	STRONG	WEAK	TOTAL
Continuum of Care	100.00% 6	0.00% 0	6
Housing Providers	16.67% 1	83.33% 5	6
Health, mental health and service agencies	40.00% 2	60.00% 3	5

MDHA 2022-2023 Action Plan Online Survey for Homelessness & Housing for Persons with HIV/AIDS

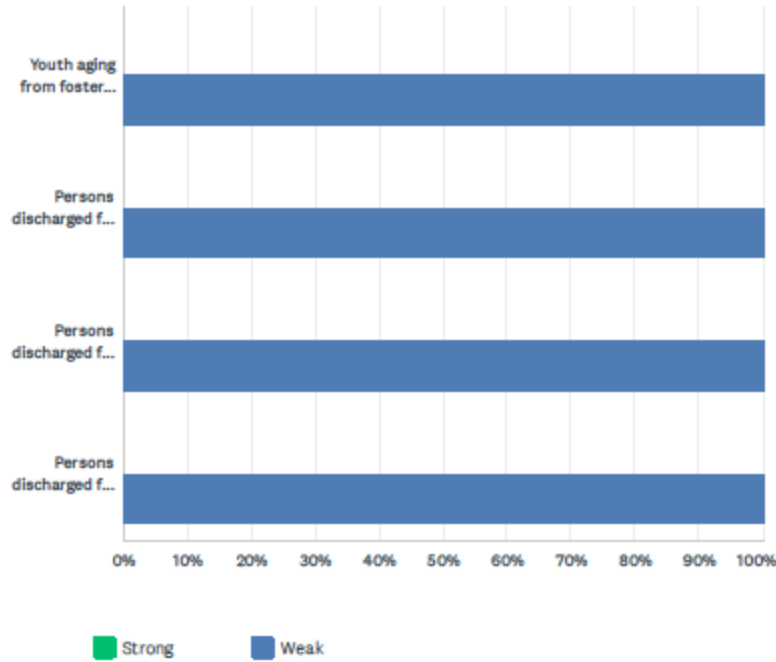
Q7 Provide one recommendation for increasing coordination for each of the following areas below: 1.) Continuum of Care 2.) Housing Providers 3.) Health, Mental Health, and Service Agencies 4.) Local and State Government Agencies

Answered: 5 Skipped: 1

#	RESPONSES	DATE
1	I'd love to see a meeting between mental health and physical health providers.	1/28/2022 11:46 AM
2	1. Continued Zoom meetings and Flow chart of services 2. Shared resources and an understanding of the need 3. More providers, less waiting list 4. Funding in appropriate places	1/27/2022 12:18 PM
3	1. Better onboarding and orientation for new agencies and members 2. Demand more units. Allocate certain % of MDHA units to people leaving homelessness. Have someone look at the MDHA waitlist application because it's very weird and several of the questions don't make sense (there are clearly mistakes) and sometimes it doesn't give you a confirmation number. Also, asking for a lot of information that you don't actually need (when applicants are racing against the clock) punishes people for being thorough. 4. Create policies and laws capping rent, incentivizing low barriers, cracking down on discrimination, requiring Section 8 Voucher acceptance, requiring mixed income. Especially for new developments.	1/26/2022 4:21 PM
4	We need more units, more landlords willing to do low barrier housing, and easy access to education about resources for those who are struggling.	1/20/2022 1:46 PM
5	Former homeless people coming back to help	1/20/2022 1:24 PM

Q8 Describe Discharge Coordination Procedures for the following:

Answered: 5 Skipped: 1



	STRONG	WEAK	TOTAL
Youth aging from foster care/state custody	0.00% 0	100.00% 5	5
Persons discharged from health care facilities	0.00% 0	100.00% 5	5
Persons discharged from mental health facilities	0.00% 0	100.00% 5	5
Persons discharged from correctional programs and institutions	0.00% 0	100.00% 5	5

Q9 Provide one recommendation for increasing discharge coordination for each of the following areas below:1.) Youth aging from foster care/state custody2.) Persons discharged from health care facilities3.) Persons discharged from mental health facilities4.) Persons discharged from correctional program and institutions

Answered: 4 Skipped: 2

#	RESPONSES	DATE
1	When people are discharged from correctional programs, I'd love to see more job opportunities lined up – The Contributor is a good place to start!	1/28/2022 11:46 AM
2	All-immediate input BEFORE discharge into HMIS/cE so discharge to an agency	1/27/2022 12:18 PM
3	Someone in the meeting said that all of these systems and organizations should be using HMIS as part of the care and discharge process, and I thought that was a great idea.	1/20/2022 1:46 PM
4	Need to be more helpful making sure these kids don't turn to the streets	1/20/2022 1:24 PM

Q10 Comments/recommendations regarding past Action Plan discussion of ESG and HOPWA programs

Answered: 2 Skipped: 4

#	RESPONSES	DATE
1	It is nearly impossible to house people who are on the sex offender registry. We need options for them. Housing is a human right.	1/20/2022 1:46 PM
2	I dont have any	1/20/2022 1:24 PM

Session 2: Action Plan Consultation: Homelessness & Housing for Persons with HIV/AIDS Held on January 19, 2022

<u>Name</u>	<u>Organization</u>	<u>Email Address</u>
Gloria Hausser	New Level Community Development Corp	gloria@nlcdc.com
Carli Tharp	The Contributor	carli@thecontributor.org
Raven Nye	The Contributor	raven@thecontributor.org
Cathy Jennings	The Contributor	cathy@thecontributor.org
Terri Lawson	Step UP	tlawson@stepup.org
Jesse Call	The Salvation Army	Jesse.call@uss.salvationarmy.org

MDHA Staff in Attendance:

Brian Sexton

Shelley Fugitt

Suzie Tolmie

LaSheakita Fayne

Treva Gilligan

Angela Harrell

Lynn Lassiter

Weldon Pride – Nashville Promise Zone

Shannan Beauchene – Nashville Promise Zone

Session 3: 2022 Non-Housing Community Development, January 27, 2022

Analysis:

There were 4 stakeholders present on the virtual call. There were also 5 MDHA staff in on the call and 1 Promise Zone Vista Member on the call. 38 stakeholders completed the survey. The conversation was dominated by the idea that community centers should be better utilized as hubs for economic development/job training, and resource centers. There was discussion at length regarding transportation being used for healthy food access. Additional themes in this discussion included ideas that transportation was still a large barrier to reducing poverty, in addition to inadequate childcare, which was exacerbated by the Covid 19 Pandemic.

Follow Up items for MDHA:

1. Utilizing community centers as hubs for job training and access to technology.
2. Prioritize funding for transportation, i.e., shuttle services to and from MDHA communities to enable residents to access to healthy food options.

MDHA RESPONSE

1. MDHA already utilizes space at our properties to support various types of programs that benefit residents. For instance, The Envision Center at Napier Sudekum (EC) is a one-stop-shop serving Napier Place, Sudekum Apartments, and the broader South Nashville community, which focuses on services related to lifelong learning, economic advancement, health and wellness, and community leadership. The EC is staffed with Navigators that assist clients in the creation of assessing needs, setting goals, and individualized plans to achieve them. The Navigators also provide ongoing support as clients access services through an integrated service delivery model. In addition to navigation services clients of the EC have access to HiSET classes, virtual financial literacy education group classes and homebuyer education group sessions through Zoom meetings. MDHA's ConnectHome program is serving students in 3-12 grades with digital literacy and good digital citizen education. Throughout COVID, the EC has also assisted vulnerable clients access resources and services including food boxes, prepared meal delivery for families with children and includes educational materials for children in the household, and household supplies. Most recent EC staff have worked with hospital and clinic partners to connect bring COVID-19 vaccination clinics and testing paired with outreach and educational opportunities into the community to maximize access.

2. This is something that can possibly considered based on consultation input when the new five-year consolidated plan cover 2023 – 2028 is developed.

Question and Responses/Discussion Summary from the Virtual Meeting:

Q1 Brainstorm Top Barriers to Reducing Poverty:

1. Lack of Affordable Housing
2. Lack of Transportation; for use to access jobs and opportunities
3. Wages that have not kept up with the costs of living is a barrier, especially true for lower wage jobs.
4. Lag in residents receiving necessary documents from Government agencies, needed to apply for jobs or affordable housing.
5. Access to affordable healthcare
6. Need to build social capital, job training, soft skills, credit worthiness.

Q2 Prioritize Top Three Barriers to Reducing Poverty with 1 being the highest in priority and 3 being the lowest.

During the virtual meeting, Affordable Housing was priority number 1, and following in order of priority were: Transportation, Childcare, Job Preparedness/Financial Readiness (Credit), and Job Training.

Q3 Brainstorm non-housing community development needs:

1. Public Facilities (e.g., community centers)
 - a. Community Centers as career hubs (i.e., job training, technology access)
2. Public Improvements & Infrastructure (i.e., sidewalks, stormwater improvements)
 - a. Sidewalks; especially for better access to community center and public facilities
3. Public Services (i.e., healthy food initiatives, summer youth programs, youth employment opportunities)
 - a. Food Access - transportation, shuttles to and from public housing facilities
4. Economic Development (i.e., microenterprise assistance, facade loans, financial empowerment training in conjunction with technical assistance) date
 - a. Support and develop partnerships with existing programs like Pathway Lending.

Q4 Prioritize top three non-housing community development activities:

1. Public Facilities - repurpose and reimagine community centers that are underutilized and that can be used for more engaging programming, access to technology, and counseling spaces. **(This is consistent with ideas shared in the 2020 and 2021 assessment years.)**
2. Public Services - Shuttle/transportation services to access healthy food and healthcare.
3. Public Improvements and Infrastructure - provide more sidewalks to help provide safe access to neighborhood community centers.

Q5 Select locations where Community Development Block Grant (CDBG) funds should be targeted; Areas with extremely high concentrations of poverty, areas with relatively high concentrations of poverty, or any LMI area:

1. Areas near MDHA facilities and areas with similar high concentrations of poverty.

On-line survey results from general responses from non-registered firms/individuals on the Constant Contact List – 38 responses to the specific questions and 12 responses to the general questions

Q1 What do you see as the top barriers to reducing poverty?

Answered: 38 Skipped: 0

#	RESPONSES	DATE
1	kindness and generosity	2/21/2022 8:23 PM
2	Raising minimum wage so that individuals can afford the raising cost of rent. Making benefits more accessible. At this moment, many have to and/or choose to stay in poverty to get governmental assistance. Make childcare accessible to all so that families have the opportunity to accept better paying jobs. Allowing the parents to not feel as if they are working just to pay childcare.	2/3/2022 8:44 AM
3	Affordable housing Drug, alcohol, addiction services	2/2/2022 3:15 PM
4	The inability of the government to get people their documents in a timely fashion, lack of units, the ridiculous amount of verifications and hoops to jump through for federal assistance, background checks, over policing impoverished neighborhoods, lack of interested landlords.	1/14/2022 12:49 PM
5	Lack of affordable housing near the jobs. Lack of public transit from housing developments to jobs.	1/14/2022 11:43 AM
6	Affordable housing	1/14/2022 10:47 AM
7	The lack of affordable child care, housing costs, lack of adequate public transportation, and the minimum wage is too low.	1/14/2022 10:24 AM
8	Cost of housing	1/14/2022 8:58 AM
9	inequality in the quality of education in lower economic districts	1/13/2022 2:24 PM
10	access to quality jobs and job training stable housing	1/13/2022 2:20 PM
11	Higher minimum wage or lower cost of living	1/5/2022 9:50 AM
12	Uncomplicated, yet appealing mental health and substance misuse "gateways" to long term assistance. I feel there are many that just won't seek out assistance until there are creative approaches.	12/29/2021 10:19 AM
13	need more housing units, barriers for Sex Offenders, and mental health barriers	12/28/2021 12:05 PM
14	Lower housing cost and livable wage.	12/28/2021 11:42 AM
15	HOUSING AND ACCESS TO SERVICES (FOOD STAMPS DIFFICULT TO GET UNLESS YOU HAVE ACCESS TO COMPUTER/PHONE. RESTRICTIVE. SS OFFICE CLOSED. HEALTH INSURANCE RESTRICTIVE ETC.) TRANSPORTATION IS TERRIBLE AND EXPENSIVE.	12/28/2021 11:21 AM
16	Lack of accessibility to resources such as housing, job training, and beyond that meet a person's basic needs.	12/27/2021 2:26 PM
17	Social support, transportation, housing and crime.	12/27/2021 8:28 AM
18	Systemic issues and ropes to jump through for resources	12/23/2021 4:03 PM
19	Affordable housing and reliable public transportation	12/22/2021 8:46 PM
20	Low income housing availability, and post-housing support services for those who have been homeless to help keep them in housing.	12/22/2021 12:43 PM
21	Lack of accessible and affordable healthcare, support, and benefits for people with disabilities, mental health issues, and substance use disorders. Lack of low-barrier, truly affordable housing. Lack of low-barrier sustaining employment. Lack of useful and affordable (free) public transportation.	12/22/2021 9:58 AM
22	education opportunity mental health drug addiction	12/22/2021 9:18 AM

Online Survey for Housing and Community Development

Q1 What do you see as the top barriers to reducing poverty?

Answered: 38 Skipped: 0

#	RESPONSES	DATE
1	kindness and generosity	2/21/2022 8:23 PM
2	Raising minimum wage so that individuals can afford the raising cost of rent. Making benefits more accessible. At this moment, many have to and/or choose to stay in poverty to get governmental assistance. Make childcare accessible to all so that families have the opportunity to accept better paying jobs. Allowing the parents to not feel as if they are working just to pay childcare.	2/3/2022 8:44 AM
3	Affordable housing Drug, alcohol, addiction services	2/2/2022 3:15 PM
4	The inability of the government to get people their documents in a timely fashion, lack of units, the ridiculous amount of verifications and hoops to jump through for federal assistance, background checks, over policing impoverished neighborhoods, lack of interested landlords.	1/14/2022 12:49 PM
5	Lack of affordable housing near the jobs. Lack of public transit from housing developments to jobs.	1/14/2022 11:43 AM
6	Affordable housing	1/14/2022 10:47 AM
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8	Cost of housing	1/14/2022 8:58 AM
9	inequality in the quality of education in lower economic districts	1/13/2022 2:24 PM
10	access to quality jobs and job training stable housing	1/13/2022 2:20 PM
11	Higher minimum wage or lower cost of living	1/5/2022 9:50 AM
12	Uncomplicated, yet appealing mental health and substance misuse "gateways" to long term assistance. I feel there are many that just won't seek out assistance until there are creative approaches.	12/29/2021 10:19 AM
13	need more housing units, barriers for Sex Offenders, and mental health barriers	12/28/2021 12:05 PM
14	Lower housing cost and livable wage.	12/28/2021 11:42 AM
15	HOUSING AND ACCESS TO SERVICES (FOOD STAMPS DIFFICULT TO GET UNLESS YOU HAVE ACCESS TO COMPUTER/PHONE. RESTRICTIVE. SS OFFICE CLOSED. HEALTH INSURANCE RESTRICTIVE ETC.) TRANSPORTATION IS TERRIBLE AND EXPENSIVE.	12/28/2021 11:21 AM
16	Lack of accessibility to resources such as housing, job training, and beyond that meet a person's basic needs.	12/27/2021 2:26 PM
17	Social support, transportation, housing and crime.	12/27/2021 8:28 AM
18	Systemic issues and ropes to jump through for resources	12/23/2021 4:03 PM
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21	Lack of accessible and affordable healthcare, support, and benefits for people with disabilities, mental health issues, and substance use disorders. Lack of low-barrier, truly affordable housing. Lack of low-barrier sustaining employment. Lack of useful and affordable (free) public transportation.	12/22/2021 9:58 AM
22	education opportunity mental health drug addiction	12/22/2021 9:18 AM

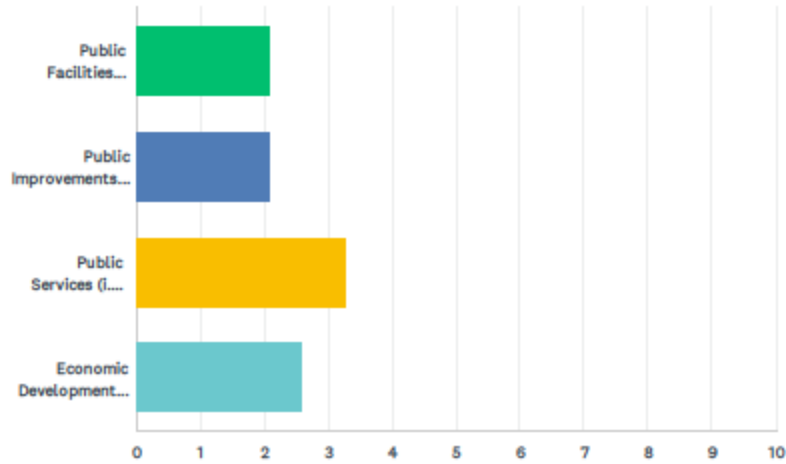
Online Survey for Housing and Community Development

23	Current policies in place (national and local) don't help people get out of poverty, they just maintain the status quo.	12/22/2021 8:36 AM
24	Not enough safety net programs, or enough "net" in the safety programs. Some programs are available, but the assistance is not nearly what it should be to actually help. Raise the minimum wage.	12/21/2021 9:57 PM
25	Access to high quality affordable housing, transit, childcare, public education, and limited wage growth for low-income earners.	12/21/2021 5:34 PM
26	Single family zoning, housing used for AirBnb and lack of VMT, reducing availability	12/21/2021 4:44 PM
27	Lack of affordable housing and healthcare	12/21/2021 4:15 PM
28	Racism, ableism, not having universal health care, not having Medicaid expansion, poorly funded schools, employers who deny employment based on criminal history, criminalizing drug use, criminalization of Marijuana, lack of reparations to black people, not supporting and providing resources to undocumented immigrants	12/21/2021 4:08 PM
29	funding, affordable housing units, shorter wait periods	12/21/2021 3:33 PM
30	Affordable housing	12/21/2021 3:04 PM
31	Low paying jobs No affordable housing Lack of adequate rehab and support	12/21/2021 2:56 PM
32	Implementing housing for the homeless. A roof over their head is the first step to them getting back on their feet, for them to have a sense of quality and safety in their life again.	12/21/2021 2:39 PM
33	plentiful jobs of high quality that pay a living wage, with low barriers to employment	12/21/2021 2:30 PM
34	Affordable housing and low wages	12/21/2021 2:01 PM
35	Stable housing whereas one can get up from a good nights sleep and attend a job and/or school.	12/21/2021 1:42 PM
36	housing ending homelessness	12/21/2021 1:37 PM
37	Homelessness and Mental Health	12/21/2021 1:36 PM
38	Ending homelessness, fair housing enforcement, reducing barriers to employment and housing, and creating affordable housing opportunities	12/21/2021 1:28 PM

Online Survey for Housing and Community Development

Q4 Rank these community development needs in terms of priority, 1 being the highest and 4 being the lowest:

Answered: 38 Skipped: 0



	1	2	3	4	TOTAL	SCORE
Public Facilities (e.g. Community Centers, Parks/Greenways, Libraries, etc.)	10.81% 4	13.51% 5	48.65% 18	27.03% 10	37	2.08
Public Improvements & Infrastructure (i.e., sidewalks, stormwater improvements, etc.)	10.53% 4	23.68% 9	28.95% 11	36.84% 14	38	2.08
Public Services (i.e., healthy food initiatives, summer youth programs, and youth employment opportunities)	51.35% 19	35.14% 13	2.70% 1	10.81% 4	37	3.27
Economic Development (i.e., technical assistance to small businesses, facade loans for businesses in lower-income areas, financial empowerment training)	28.95% 11	26.32% 10	18.42% 7	26.32% 10	38	2.58

Online Survey for Housing and Community Development

Q5 Please Feel Free to Leave Additional Comments Below

Answered: 12 Skipped: 26

#	RESPONSES	DATE
1	There was an entire population of people left out of the meeting, and the survey. It is nearly impossible for housing navigators and organizations that help with housing to find places for people on the sex offender registry. No one will take them, so they remain homeless. They may have committed a crime, but housing needs to be a human right. No one deserves to live outside.	1/14/2022 12:49 PM
2	Not enough accessible housing is available for people with disabilities. Many of the new properties being developed do not comply with basic Fair Housing Design and Construction Standards.	1/14/2022 10:24 AM
3	HOUSING TRANSPORATION HOUSING TRANSPORTATION HOUSING TRANSPORTATION	12/28/2021 11:21 AM
4	The housing first initiative addresses those experiencing homelessness but wrap around care and continued support for the tenant and the community prevents homelessness.	12/27/2021 8:28 AM
5	Currently, MDHA operates wait lists for its affordable housing properties on a first come, first served basis, which immediately places people experiencing homelessness at a disadvantage. This policy should be ended and MDHA should instead commit to filling 50% of vacancies from the Coordinated Entry pool of people experiencing homelessness. We are not asking for new units to be dedicated to those experiencing homelessness, rather new vacancies in current units, and only half of the time. This is more than reasonable. Right now, people experiencing homelessness experience NO preference to move into these subsidized units, and this is unacceptable. The Mayor's Office must be more transparent in its intentions and dealings and bring more people to the table to achieve solutions.	12/23/2021 4:03 PM
6	We need more libraries and community centers, services and programs within those, and for those we have to fully open with longer hours.	12/22/2021 12:43 PM
7	it's amazing that y'all are trying to do better than what you already are there's slot of help here for the ones that truly want it and seek it it's absolutely amazing what some of the programs do for people lives like the salvation army on dickerson pike	12/22/2021 9:18 AM
8	Currently, MDHA operates wait lists for its affordable housing properties on a first come, first served basis, which immediately places people experiencing homelessness at a disadvantage. This policy should be ended and MDHA should instead to commit to filling 50% of vacancies from the Coordinated Entry (Homeless database) pool of people experiencing homelessness. We are not asking for new units to be dedicated to those experiencing homelessness, rather new vacancies in current units, and only half of the time. This is more than reasonable. Right now, people experiencing homelessness experience NO preference to move into these subsidized units, and this is unacceptable.	12/21/2021 9:57 PM
9	All community development priorities are luxuries only the housed can enjoy- the root of the issue is that prices have skyrocketed for rent. Even being paid \$18/hr rent is not affordable. Single parents to multiple children are becoming homeless rapidly. STOP THE BIG DEVELOPER	12/21/2021 4:15 PM
10	People should have access to good rehab with follow up assistance.	12/21/2021 2:56 PM
11	We must add units for people experiencing homelessness.	12/21/2021 2:39 PM
12	We have to stop deprioritizing homelessness. Prioritize homelessness to fill public housing vacancies. Incentivize landlords to accept vouchers from people experiencing homelessness.	12/21/2021 1:28 PM

**Session 3: 2022 Non-Housing Community Development,
January 27, 2022**

<u>Name</u>	<u>Organization</u>	<u>Email Address</u>
Jon Eisen	Pathway Lending	jon.eisen@pathwaylending.org
Vicky Batcher	Individual	vbatcher50@aol.com
Arthur Murray	Step Up	amurray@stepup.org
Raven Nye	The Contributor	raven@thecontributor.org

MDHA Staff

Emel Alexander

Treva Gilligan

Shelley Fugitt

Angela Harrell

Brian Sexton

Weldon Pride – Nashville Promise Zone Vista

APPENDIX D

REQUEST FOR PUBLIC COMMENT AND NOTICE OF PUBLIC HEARING
2022-2023 ANNUAL UPDATE FOR PROGRAM YEAR 5 (2022 ACTION PLAN)
TO
THE 2018-2023 CONSOLIDATED PLAN
FOR
HOUSING AND COMMUNITY DEVELOPMENT

The Metropolitan Development and Housing Agency (MDHA) will hold an in-person public hearing on this proposed amendment at 1:30 p.m. CDT, April 28, 2022, at the Vine Hill Studio Apartments' community room at 625 Benton Ave., Nashville, TN 37204. Wearing a face mask and social distancing are strongly encouraged. The hearing can also be attended virtually via the below Zoom link:

<https://bit.ly/MDHAApril282022>

Public Comment Period: The draft 2022 Action Plan was made available for public examination and comment on April 11, 2022.

Members of the public may obtain copies in the following ways:

- Downloading copies from MDHA's website at <http://www.nashville-mdha.org/consolidated-plan/>
- Requesting copies by calling the MDHA Community Development Department at 615-252-8505 or Telephone Device for the Deaf (TDD) at 615-252-8599;
- Picking up copies in the lobby of MDHA's Community Development Department at 712 S. Sixth St., Nashville, TN 37206, between the hours of 7:30 a.m. and 4 p.m. Monday through Friday.

MDHA will receive written comments through 4 p.m. CDT Friday, May 13, 2022.

- Comments may be submitted electronically at consolidatedplan@nashville-mdha.org;
- Faxed to 615-252-8533 (Attention: Consolidated Plan);
- Mailed to MDHA Community Development Department, Attention: Consolidated Plan, P.O. Box 846, Nashville, TN 37202
- Hand-delivered to MDHA Community Development Department, Attention: Consolidated Plan, 712 S. Sixth St., Nashville TN 37206.

Purpose and Summary: MDHA has prepared for submittal to the U.S. Department of Housing and Urban Development (HUD) a draft 2022-2023 Annual Update for Program Year (PY) 5 (2022 Action Plan).

The 2022 Action Plan describes community needs and funding priorities for the 2022-2023 program year (June 1, 2022, through May 31, 2023) and serves as Metropolitan Government of Nashville and Davidson County's application for receiving funds for the following programs: Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), Emergency Solutions Grants (ESG) and Housing Opportunities for Persons with Aids (HOPWA). Proposed funding allocations are intended to address the priority needs identified in the 2018-2023 Consolidated Plan, as amended, and to benefit low- and moderate-income (LMI) households and areas. Details regarding specific activities to be funded are provided in the 2022 Action Plan.

Funding Priorities:

- Increase the number of decent, safe affordable units and help LMI households access affordable housing;
- Preserve existing affordable housing units and help LMI tenants and homeowners retain housing;
- Support facilities and services for persons experiencing homeless and persons with HIV/AIDS;
- Create pathways to self-sufficiency for LMI persons and families;
- Revitalize distressed neighborhoods and underserved areas;
- Undertake grant management, planning and other eligible administrative tasks authorized under CDBG, HOME, ESG and HOPWA.

Anticipated Resources: Estimated based on 2021 Allocations, to be adjusted proportionately upward or downward when 2022 Allocation Amounts are received from HUD, which is anticipated to be on or around May 13, 2022.

	CDBG	HOME	ESG	HOPWA
2022 Allocation	\$5,421,549.00	\$ 2,570,146.00	\$453,167.00	\$1,737,427.00
Estimated Program Income	\$ 348,711.00	\$ 160,678.00	\$ -	\$ -
TOTAL	\$5,770,260.00	\$ 2,730,824.00	\$453,167.00	\$1,737,427.00

2022-2023 Proposed Allocations:

CDBG	
Project Type	Proposed Budget
Administration & Planning	\$ 1,138,305.00
Public Services	\$ 845,232.00
Housing	\$ 609,000.00
Public Facilities & Infrastructure	\$ 3,177,723.00
TOTAL	\$ 5,770,620.00

HOME	
Project Type	Proposed Budget
Administration	\$ 273,081.00
New Construction Ownership Programs	\$ 275,067.00
New Construction Rental Programs	\$1,907,609.00
New Nonprofit Set Aside	\$ 275,067.00
TOTAL	\$2,730,824.00

ESG	
Project Type	Proposed Budget
Administration	\$ 31,721.00
Emergency Shelter & Transitional Housing; Rapid Re-Housing; Street Outreach; Prevention;	\$ 416,446.00
HMIS	\$ 5,000.00
TOTAL	\$ 453,167.00

HOPWA	
Project Type	Proposed Budget
Administration	\$ 173,742.00
Facility-Based Housing Assistance; Short-term Rent, Mortgage & Utilities; TBRA; Supportive Services	\$1,563,685.00
TOTAL	\$1,737,427.00

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

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

如果需要本通知的中文翻译，请打电话 615-252-8505

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

بلاصتلا ىجرى، ناييلا اذهل تيمير ء تمجرت ىلء ل وصللا: 615-252-8505

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

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



APPENDIX E
SUMMARY OF PUBLIC COMMENTS AND MDHA RESPONSES

**Comments/Questions received at the
in-person and virtual Public Hearing April 28, 2022
and
during the Public Comment Period**

Other than MDHA Staff, there was no one in attendance at the April 28, 2022, Public Hearing, either in person or on Zoom. The attendance sheet is shown below hearing is included below.

Sign In Sheet

Action Plan Public Hearing		April 28, 2022 at 1:30 PM	
NAME-PLEASE PRINT	Company	Phone Number	Email Address-PLEASE PRINT
Shelley Fugitt	MDHA	615-252-6702	sfugitt@nashville-mdha.org
TREVA Gilligan	MDHA	615-252-6532	tgilligan@nashville-mdha.org
Lynn Lassiter	MDHA	615-252-8505	llassiter@nashville-mdha.org
Cecelia Harrell	MDHA	615-252-8422	aharrell@nashville-mdha.org
Emel Alexander	MDHA	8507	ealexander@nashville-mdha.org
Brian Sexton	MDHA	8535	bsexton@nashville-mdha.org

Name (Original Name)	User Email	Join Time	Leave Time	Duration (Minutes)	Guest	Recording	In Waiting Room
Lynn Lassiter	llassiter@nashville-mdha.org	4/28/2022 12:38	4/28/2022 12:49	12	No	Y	No
Call-Out User_1		4/28/2022 12:38	4/28/2022 12:49	12	Yes		No
bsexton		4/28/2022 12:38	4/28/2022 12:44	7	Yes	Y	No
Brian Sexton		4/28/2022 12:43	4/28/2022 13:51	68	Yes	Y	No
Pam Dotson	pdotson@nashville-mdha.org	4/28/2022 13:22	4/28/2022 13:42	21	No	Y	No
Pam Dotson	pdotson@nashville-mdha.org	4/28/2022 13:43	4/28/2022 13:50	8	No		No

Additionally, a video of the public hearing presentation was sent out to 1,504 via Constant Contact. The link to the video is listed below:

<https://vimeo.com/706290162>

Action Plan 2022 1080P.m4v on Vimeo

This is "Action Plan 2022 1080P.m4v" by Brian Sexton on Vimeo, the home for high quality videos and the people who love them.

Public Hearing Transcript

Brian Sexton:

My name is Brian Sexton and I would like to welcome you to our meeting for the 2022/2023 annual update for program year 5 to 2018/2023 consolidated plan. If you are watching this online, you can always call our office if you have questions and email us at the contact information that we will share at the end of this presentation. Thank you again for joining us!

Before we dive into our discussion, I would like to give a brief overview of our consolidated plan. MDHA's consolidated plan is designed to help Nashville's affordable housing and community development needs. The consolidated planning process is a five-year process and it serves as a framework for a community wide dialogue to identify housing and community development priorities. I'll show you those priorities on the following slide. The consolidated planning process also services as application for funding for federal entitlement programs on behalf of Nashville-Davidson county. Those programs include Community Development Block Grants (also known as CDBG), Home Investment Partnerships (also known as HOME), Emergency Solutions Grant (also known as ESG), Housing Opportunities for Persons with AIDS (also known as HOPWA). The consolidated plan is carried out through annual updates also known as the action plan which provides a concise summary of the actions, activities, and specific federal and non-federal resources that will be used each year to address the priority needs and specific goals identified by the Consolidated Plan.

As mentioned on the previous slide, our consolidated plan funding priorities include (1) increase the number of decent, safe affordable units and help low and moderate income households access affordable housing, (2) preserve existing affordable housing units and help low and moderate income households retain housing, (3) support facilities and services for the homeless and persons with HIV and/or AIDS, (4) create pathways to self-sufficiency for low and moderate income persons and families, (5) revitalize distressed neighborhoods and underserved areas, and (6) undertake grant management, planning, and other eligible administrative tasks under CDBG, HOME, ESG, and HOPWA. Again, these priorities are carried out through our action plan.

A quick note. MDHA will not receive notification from HUD for the program year 2022 formula grant allocations until around May 13, 2022. Therefore, the activity budgets in this draft Action Plan are based on the program year 2021 dollar amounts and will be proportionately increased or decreased from the estimated funding levels to match the action allocation amounts once they are received. Therefore, anticipated resources are as follows: 2022 program year 5 anticipated resources include: for CDBG, 2022 annual allocation includes \$5,421,549.00, estimated program income \$348,711.00 for a total of \$5,770,260.00. For ESG, 2022 annual allocation includes \$453,167.00. There is no estimated program income. the total, as you can see, is the same total, \$453,167.00. For HOME, 2022 annual allocation includes \$2,570,146.00 with estimated income at \$160,678.00 for a total of \$2,730,824.00. For HOPWA, the 2022 annual allocation includes \$1,737,427.00. There is no estimated program income. The total is the same as the annual allocation, \$1,737,427.00. And looking at the total allocation for 2022 is

\$10,182,289.00. Total estimated program income is \$509,389.00. For a total of \$10,691,678.00 of all anticipated resources. 2022 CDBG and HOME Year 5 budget includes the following amounts as shown. I'll let the viewers take a look at the numbers. Again, this information will be shared online as well as through our email subscriber list. The 2022 ESG and HOPWA Year 5 budget amounts includes the following as shown. I'll let the viewers take a look at the screen.

Citizen Participation. We would like all our viewers to take note that MDHA will receive written comments through 4 PM Friday, May 13, 2022. You may also submit your comments via email at the email address as shown, consolidatedplan@nashville-mdha.org. You can fax your comments or you can mail your comments. Please take note that all mailed comments must be postmarked no later than Friday, May 13th, 2022. That ends our virtual recording.

Comment Received via email during the Public Comment Period

My name is Mrs. Kennetha " The Homeless CEO " Patterson I advocate for severely undeserved large families facing housing disparities I'm TN as a whole & nationally as SRC Taskforce Admin of current & former HUD tenants network of 40k plus .

I am writing because we applied last year with a partner group (coalition) we were offered help to apply for grants via MDHA such as COC , CDC , ESG .

The coalition no longer exist but my organization is continuing the work , because we believe that housing is the nucleus of every family.

As CEO Founder of (www.visionheirsinc.org) I not only have a learning disability amongst mental health largely due to trauma surrounding housing disparities in my native city of Nashville, I am also a former client of many of MDHA's & partners homelessness services.

My organization is also severely undeserved just like the population we seek to be able to help , with new housing creation .

We simply need the tool of funds & help navigating towards access that has been inaccessible for quite some time.

In addition I have had various obstacles in becoming a voice of lived experience q6on the COC / Homeless Impact division / ect . I nominated myself nothing, an existing non profit member of the homelessness commission knew my work & helped me apply because he specifically say my voice is needed in those rooms but I'm purposely blocked ☹ .

I am no large developer just a native that has watched her city grow without her family , as her family not only lives & work while homeless in Nashville post gentrification but because of that is how we know exactly what is missing inside housing disparities.

We are the ultimate poverty simulation that needs to be heard & helped to implement inside this housing plan we have to add more unit's especially accepting section 8 . (The plan is literally asking for implementation of programs like ours all while being ignored , and we have what's missing to offer .)

May I please realistically be heard on this & get a response back , because I see all this about housing crisis when we are screaming we have a real solution all we need is land and funds to kickstart the building of economically strong communities that will also spur climate change , food security , permanent housing stock growth.

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MDHA Response

Ms. Patterson, thank you for your comments. There are several resources in the Action Plan dedicated to supporting individuals experiencing homelessness. ESG and HOME funding are both resources that nonprofits may apply for to support programs targeting this population. MDHA will ensure your name is included on the distribution list when those funding opportunities are announced. You are also encouraged to attend the application orientation listed in each funding announcement to learn more about how to submit a strong application.

It is MDHA's understanding that the CoC Nominating Committee has recommended your name be placed on the ballot of individuals to be voted on by the CoC General Membership to fill vacancies on the CoC Planning Council at the June meeting. Additionally, HUD has approved technical assistance for the CoC to focus on providing training to help new entities learn how to respond to Requests for Proposals competitively to increase their chances of receiving CoC funding. Hopefully, these steps address some of your concerns.

APPENDIX F
FAIR HOUSING PLAN

FAIR HOUSING GOALS & PRIORITIES

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

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

Segregation

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

R/ECAPs

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

Disparities in Access to Opportunity

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

Disproportionate Housing Needs

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

Publicly Supported Housing

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

Disability and Access

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

Fair Housing Enforcement and Outreach

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

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

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

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

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

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

<p>Proficiency (LEP) and persons with disabilities.</p>	<p>policies and procedures, including preferences in publicly supported housing</p> <ul style="list-style-type: none"> • Community opposition • Impediments to mobility • Lack of affordable housing in a range of unit sizes • Lack of affordable, integrated housing for individuals who need supportive services • Lack of meaningful access for individuals with LEP • Location and type of affordable housing • Quality of affordable housing information programs 	<ul style="list-style-type: none"> • Publicly Supported Housing 	<p>3(b). Engage and incentivize landlords with housing in opportunity areas to accept Vouchers. (1-5 years)</p> <p>3(c). Expand language access to leases, loan documents, etc. (1-5 years)</p> <p>3(d). Require that all publicly-funded affordable housing projects meet universal design or visitability standards. (1-5 years)</p> <p>3(e). Develop creative homeownership (purchase). Options. (1-5 years)</p> <p>3(f). Review and make MDHA's policy for considering criminal history available to the public. (1-2 years)</p> <p>3(g). Create a countywide housing navigation system. (1-5 years)</p>	<p>3(c). MDHA (CP & PHA), Metro</p> <p>3(d). MDHA (CP & PHA), Metro</p> <p>3(e). Metro, MDHA (CP)</p> <p>3(f). MDHA (PHA)</p> <p>3(g). MDHA (CP), Metro</p>
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Discussion: Goals 1 & 2 are intended to address the built environment by creating and preserving housing units, while Goals 3 & 4 are intended to assist persons with protected characteristics overcome barriers to securing and/or retaining this housing. 3(a) – MDHA and Metro will work with the Continuum of Care (CoC) to educate homeless service providers and landlords about Housing First and to align programs and funding sources that will address Disability and Access, Disproportionate Housing Needs, and Publicly Supported Housing. 3(b) – The analysis shows an overwhelming concentration of Vouchers in Segregated areas, R/ECAPs, and areas with Disparities in Access to Opportunity; providing incentives to landlords with rental housing in other areas of the county will decrease Vouchers concentrated in these areas. 3(c) – Metro and MDHA will partner with housing industry associations to facilitate (train and provide resources) the expansion of leases and other real estate related documents to persons with LEP. 3(d) MDHA and Metro will include universal design and visitability requirements in all funding awards to developers and in all government constructed housing to address Disability and Access and Disproportionate Housing Needs. 3(e) – During the development of the AFH, community members expressed limitations on their ability to purchase a home due to religious beliefs. Metro and MDHA will work with lenders to make home purchase financing available in a means accessible by persons who cannot typically access conventional methods which will broaden housing options outside of Segregated areas, R/ECAPs, and area with Disparities in Access to Opportunity. 3(f) – MDHA will review its policy on considering criminal history for admission to ensure it meets HUD standards and will post it on MDHA’s website so that the public knows what is required to access Publicly Supported Housing. 3(g) MDHA and Metro will lead on aligning housing providers and programs to educate residents on housing options in the county. A countywide housing navigation system will help locate housing outside of Segregated areas, R/ECAPs, and areas with Disparities in Access to Opportunity.

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

			properties. (2-5 years)	
<p>Discussion: Goals 1-4 focused on creating and retaining housing outside of Segregated areas, R/ECAPs, and area with Disparities in Access to Opportunity and increasing access to/preserving housing occupied by persons with disabilities and LEP. Goals 5-7 focus on bringing opportunities and investment to underserved areas, which are Segregated, R/ECAPs, and have significant Disparities in Opportunity. 5(a) – By securing additional funding, Metro can expand programs Financial Empowerment Center to target persons in R/ECAPs, particularly youth. 5(b) – MDHA will continue its participation in the ConnectHome initiative and bring technology and training programs to all properties.</p>				
<p>6. Increase public investment in underserved neighborhoods</p>	<ul style="list-style-type: none"> Lack of community revitalization strategies Lack of public investment in specific neighborhoods, including services or amenities 	<ul style="list-style-type: none"> Segregation R/ECAPs Disparities in Access to Opportunity Disproportionate Housing Needs Publicly Supported Housing 	<p>6(a). Leverage resources to redevelop public housing properties in R/ECAPs to create mixed-income, mixed-use communities. (1-5+ years)</p> <p>6(b). Continue to target public funds for neighborhood programs and infrastructure projects in R/ECAPs. (1-5 years)</p>	<p>6(a). MDHA (PHA & CP), Metro</p> <p>6(b). MDHA (CP), Metro</p>
<p>Discussion: Through initiatives such as MDHA’s RAD conversion and planned recapitalization of its older properties, the recently designated Promise Zone, and the CDBG Place-Based Strategy, Metro and MDHA have demonstrated a commitment to increase public investment in the county’s most underserved areas. These areas are highly Segregated, R/ECAPs, and have significant Disparities in Access to Opportunity. 6(a) – MDHA will continue to implement its recapitalization (“Envision”) plans to demolish and redevelop its traditional public housing sites, keeping its commitment to 1-for-1 replacement of public housing while creating new workforce and market rate housing. MDHA’s first Envision effort is underway at the James Cayce apartments with its first mixed income building soon to be under construction. 6(b) In the 2013-2018 Consolidated Plan, MDHA introduced a Place-Based Strategy for Community Development, targeting CDBG funds in underserved areas. As MDHA leads the development of the next 5 Year Consolidated Plan, it will continue to allocate funding to capital improvements and other projects in R/ECAPs, subject to Citizen Participation.</p>				
<p>7. Incentivize private</p>	<ul style="list-style-type: none"> Lack of community 	<ul style="list-style-type: none"> Segregation R/ECAPs 	<p>Offer incentives to</p>	<p>Metro, MDHA</p>

<p>investment in underserved neighborhoods</p>	<p>revitalization strategies</p> <ul style="list-style-type: none"> • Lack of private investment in specific neighborhoods • Land use and zoning 	<ul style="list-style-type: none"> • Disparities in Access to Opportunity • Disproportionate Housing Needs 	<p>attract private investment in R/ECAPs and areas with concentrations of publicly supported housing. (2-5 years)</p>	<p>(PHA & CP)</p>
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Discussion: To truly bring opportunity to underserved areas, public investment needs to leverage private investment. Tax increment financing (TIF) is one tool to stimulate private investment in established Redevelopment Districts and to-be-created Transit Oriented Redevelopment Districts. By prioritizing planning and development efforts in these distressed areas, private developers can access TIF and other incentives to facilitate development projects.

<p>8. Expand fair housing outreach, education, and enforcement activities.</p>	<ul style="list-style-type: none"> • Community opposition • Lack of local public fair housing enforcement • Lending discrimination • Private discrimination 	<ul style="list-style-type: none"> • Segregation • R/ECAPs • Disability and Access • Disparities in Access to Opportunity • Disproportionate Housing Needs 	<p>8(a). Coordinate with neighborhood groups and community leaders to identify fair housing issues. (<1 year)</p> <p>8(b). Continue to use CDBG funds to support fair housing outreach, education, and enforcement activities. (1-5 years)</p> <p>8(c). Consider creating a local mechanism to enforce Fair Housing complaints. (1-2 years)</p>	<p>8(a). Metro, MDHA (CP)</p> <p>8(b). MDHA (CP)</p> <p>8(c). Metro</p>
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Discussion: Metro and MDHA will strengthen commitments to affirmatively further fair housing by expanding outreach, education, and enforcement activities so that residents are fully informed of their rights, the housing industry understands its responsibilities, and public agencies can address issues. 8(a) – MDHA and Metro will launch a joint public awareness campaign in partnership with local groups and leaders. 8(b) – MDHA has partnered with the

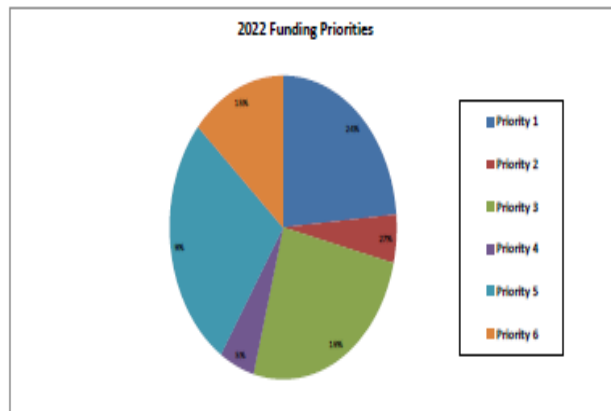
local FHIP agency to support its fair housing activities and will propose to continue this partnership in the new 5 Year Consolidated Plan. 8(c) – Currently, Metro does not have a mechanism to enforce local fair housing violations. It will review its authority and capacity to develop an enforcement mechanism.

APPENDIX G

**SUMMARY OF PROGRAM PRIORITIES AND GOALS
BY FUNDING AMOUNTS AND ACTIVITIES**

METRO NASHVILLE-DAVIDSON COUNTY CONSOLIDATED PLAN PRIORITIES AND GOALS - 2022 PROGRAM YEAR					
Increase the number of decent, safe affordable units and help LMI households access affordable housing including, increased access to housing/shelter for persons with special needs.		\$2,579,506.00			
Priority 1					
Activity	New Construction	2022 Budget	Year 4 Goals	Target Area	Income Target
HOME	Rental	\$2,006,284.00	50	HTA	60%
HOME	Homeownership	\$286,611.00	7	HTA	80%
HOME	New Nonprofit Partner Set-aside	\$286,611.00	3	HTA	80%
Activity	Address Housing Barriers				
CDBG	*Fair Housing Activities - underway funded with Prior Year Funds		150	HTA	80%
Activity	Increased access to housing/shelter for persons having special needs.				
CDBG	*Acquisition, Construction or Reconstruction, rehabilitation or installation of public facilities and improvements - available \$ amount, goals, income target included in Priority 5 - Public Facility and Improvements.			CW	
Priority 2	Preserve existing affordable housing units and help LMI tenants and homeowners retain housing.	\$561,567.00			
Activity	Retain affordable housing stock				
CDBG	*H/O Rehab (Targeted to Gentrifying Areas) - Funded in 2018, 2019 & 2020 - progress stalled due to COVID - program back underway with prior year funding	\$0.00	40	HTA	80%
CDBG	*Weatherization Assistance - same as above	\$0.00	20	CW	60%
CDBG	*Roof Replacement - same as above	\$0.00	20	CW	80%
CDBG	*Accessibility Rehabilitation - same as above	\$0.00	20	CW	80%
CDBG	*HVAC Replacement	\$0.00	20	CW	80%
CDBG	*Rental Rehab - Funded in PY 2018, underway in PY 2022	\$0.00	6	HTA	80%
CDBG	Housing Services/Delivery	\$561,567.00	N/A	CW	N/A
Activity	Maintain Housing Stability				
CDBG	*Renter Counseling (MDHA Affordable Housing Residents) - Funded in PY 2018, underway in PY 2022	\$0.00	125	HTA	60%
Priority 3	Support facilities and services for the homeless and persons with HIV/AIDS	\$2,775,231.00			
Activity	Assist Homeless Persons & Persons with HIV/AIDS				
CDBG	Services for the Homeless	\$253,000.00	250	CW	30%
ESG	HMIS	\$5,000.00	N/A	CW	N/A
ESG	Rapid Re-housing		325	CW	30%
ESG	Prevention		75	CW	30%
ESG	Shelter Operations/Essential Services	\$416,558.00	2000	CW	30%
ESG	Outreach		100	CW	30%
HOPWA	Sponsor Admin.	\$151,595.00	N/A	MSA	80%
HOPWA	Short Term Rent, Mortgage, and Utilities		275	MSA	80%
HOPWA	Rental Assistance/Permanent Housing (FBRA and TBRA)		53	MSA	80%
HOPWA	Supportive Services - Permanent Housing Placement	\$1,949,078.00	2320	MSA	80%
HOPWA	Short Term/Emergency Assistance		15	MSA	80%
Priority 4	Create pathways to self-sufficiency for LMI persons and families.	\$547,000.00			
Activity	Create economic opportunities for LMI persons				
CDBG	Employment Services (Section 3 Opportunities)	\$47,000.00	10	HTA	60%
CDBG	*Microenterprise Assistance - underway in 2022 with prior year funds		30	CDBG-T	80%
Activity	Support Youth Programs				
CDBG	Summer Youth	\$320,000.00	1200	CW	80%
CDBG	Opportunity NOW	\$180,000.00	110	CW	80%
CDBG	*Public Service Program Delivery - incorporated as part of activity cost	\$0.00	N/A	CW	80%
Priority 5	Revitalize distressed neighborhoods and underserved areas.	\$2,976,161.00			
Activity	Invest in Underserved Areas				
CDBG	Public Facilities/Improvements	\$2,976,161.00	3	CDBG-T & CW	LMI-Area, 51% LMI, or LMI Limited Clientele

CDBG	2020, underway in FY 2022	20,000	125	N/A	0%
Priority 3	Support facilities and services for the homeless and persons with HIV/AIDS	\$2,775,231.00			
Activity	Assist Homeless Persons & Persons with HIV/AIDS				
CDBG	Services for the Homeless	\$253,000.00	250	CW	30%
ESG	HMIS	\$5,000.00	N/A	CW	N/A
ESG	Rapid Re-housing		325	CW	30%
ESG	Prevention		75	CW	30%
ESG	Shelter Operations/Essential Services	\$416,558.00	2000	CW	30%
ESG	Outreach		100	CW	30%
HOPWA	Sponsor Admin.	\$151,595.00	N/A	MSA	80%
HOPWA	Short Term Rent, Mortgage, and Utilities		275	MSA	80%
HOPWA	Rental Assistance/Permanent Housing (FBRA and TBRA)		53	MSA	80%
HOPWA	Supportive Services - Permanent Housing Placement	\$1,949,078.00	2320	MSA	80%
HOPWA	Short Term/Emergency Assistance		15	MSA	80%
Priority 4	Create pathways to self-sufficiency for LMI persons and families.	\$547,000.00			
Activity	Create economic opportunities for LMI persons				
CDBG	Employment Services (Section 3 Opportunities)	\$47,000.00	10	HTA	60%
CDBG	*Microenterprise Assistance - underway in 2022 with prior year funds		30	CDBG-T	80%
Activity	Support Youth Programs				
CDBG	Summer Youth	\$320,000.00	1200	CW	80%
CDBG	Opportunity NOW	\$180,000.00	110	CW	80%
CDBG	*Public Service Program Delivery - incorporated as part of activity cost	\$0.00	N/A	CW	80%
Priority 5	Revitalize distressed neighborhoods and underserved areas.	\$2,976,161.00			
Activity	Invest in Underserved Areas				
					LMI-Area, 51% LMI, or LMI Limited Clientele
CDBG	Public Facilities/Improvements	\$2,976,161.00	3	CDBG-T & CW	
CDBG	*Public Facility Program Delivery - incorporated as part of activity cost	\$0.00	N/A	CDBG-T	LMI-Area
Priority 6	Undertake grant management, planning, and other eligible administrative tasks authorized under CDBG, HOME, ESG, and HOPWA.	\$1,470,191.00			
Activity	Provide oversight and management of grants.				
CDBG	CDBG	\$1,084,431.00	N/A	CW	N/A
HOME	HOME	\$286,611.00	N/A	CW	N/A
ESG	ESG Admin	\$34,180.00	N/A	CW	N/A
HOPWA	HOPWA	\$64,969.00	N/A	MSA	N/A
TOTAL		\$10,909,656.00			



METROPOLITAN NASHVILLE-DAVIDSON COUNTY, TENNESSEE

EXHIBITS

**2022-2023 ANNUAL UPDATE
TO THE
2018-2023 CONSOLIDATED PLAN
FOR
HOUSING AND COMMUNITY DEVELOPMENT
PROGRAM YEAR FIVE**

For the period June 1, 2022 – May 31, 2023

Prepared by:

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



Draft for Public Comment – April 11, 2022

2022-2023 Annual Update to the 2018-2023 Consolidated Plan

(2022 Action Plan) Program Year Five

EXHIBITS

Exhibit 1 - Determining a Census Tract Number

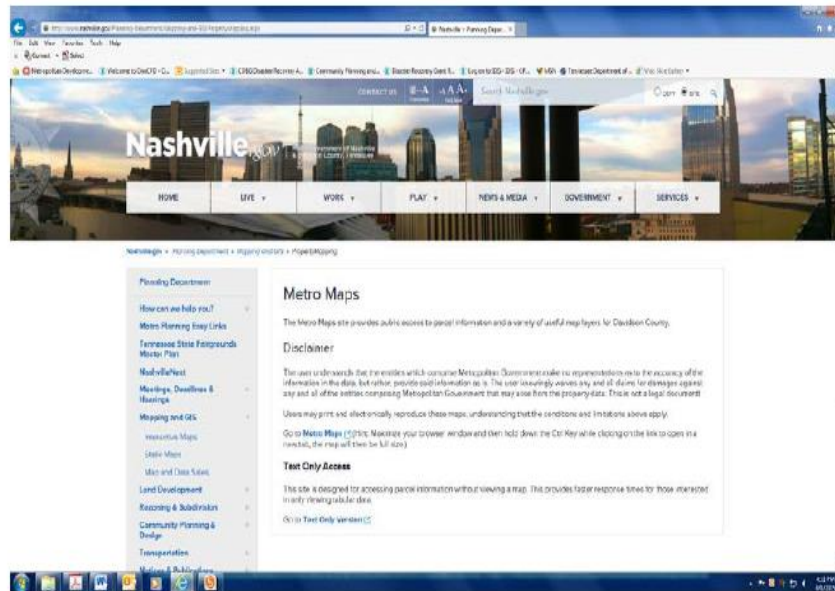
Exhibit 2 - Notice of 2022 Allocations

Exhibit 3 - HUD Approval of 2022 Action Plan Extended Submission Date

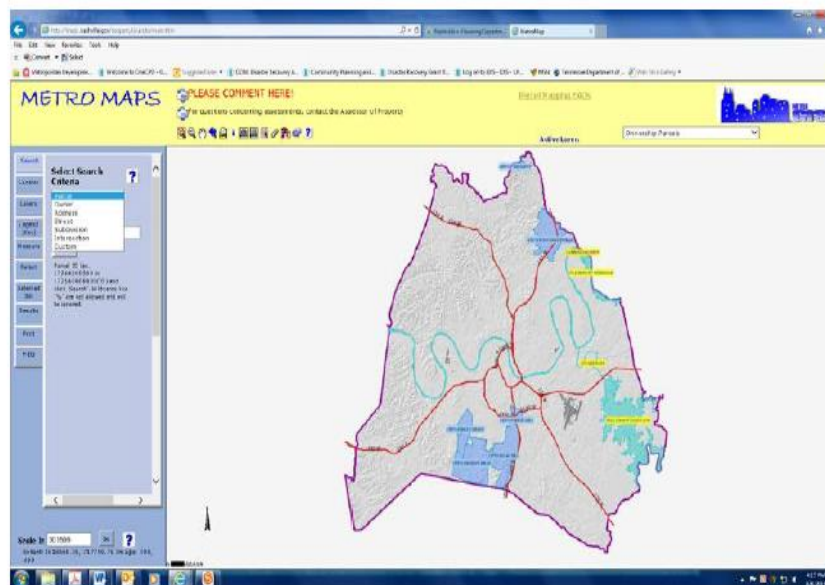
EXHIBIT 1

HOW TO DETERMINE YOUR CENSUS TRACT

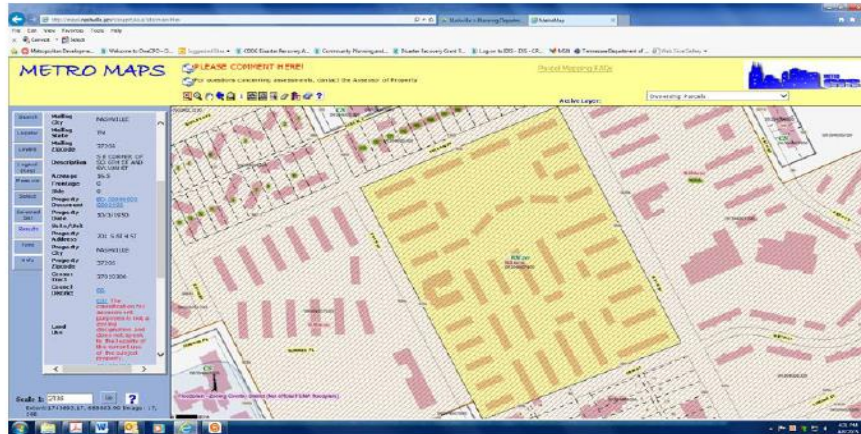
1. Go to: <http://www.nashville.gov/Planning-Department/Mapping-and-GIS/PropertyMapping.aspx>.
2. Click on: **Metro Maps** in the sentence that says, “Go to Metro Maps”.



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



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



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

EXHIBIT 2

HUD NOTIFICATION of 2022 ALLOCATIONS

FY 2022 Community Planning and Development Formula Program Allocations

NAME	CDBG	RHP	HOME	ESG	HOPWA	HTF	
Nashville-Davidson	TN	\$5,073,448	\$0	\$2,705,439	\$455,738	\$2,165,642	\$0

EXHIBIT 3

HUD APPROVAL OF 2022 ACTION PLAN EXTENDED SUBMISSION DATE



U. S. Department of Housing and Urban Development

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

May 2, 2022

Troy D. White, Executive Director
Metropolitan Development and Housing Agency
P.O. Box 846
Nashville, Tennessee 37202

Dear Mr. White:

SUBJECT: Action Plan - Request to Extend Submittal Deadline of the 2022 Action Plan to August 16, 2022

This letter is in response to the April 8, 2022, letter regarding the above subject matter. In the letter, the Metropolitan Development and Housing Agency (MDHA), as the lead agency of Nashville - Davidson County's Consolidated Planning programs, is in the process of completing the Metropolitan Government's Annual Action Plan. In accordance with Notice CPD-22-52, the Consolidated Plan and Annual Action Plan is due within 60 days of the Department of Housing and Urban Development's (HUD) Notice of Allocations for 2022. The purpose of the extension request is to allow enough time for MDHA Board approval, Metro Council approval, and for the Mayor to sign the SF 424 and Certifications.

You stated that you anticipate obtaining Metro Council approval at one of its July 2022, meetings. After Metro Council approval, the Mayor will sign the SF 424 and Certifications, which will then be submitted to HUD for approval no later than August 16, 2022.

This Office has reviewed the justification provided to support the request and the request has been approved. Please keep in mind that the final deadline for receipt of any 2022 Annual Action Plan, is August 16, 2022. As you know, this deadline cannot be waived.

If you have any questions, please contact Michelle Lewis, Senior Community Planning and Development Representative, at (865) 474-8229.

Very sincerely yours,

Erik Hoglund, Director
Office of Community Planning
and Development

cc:
Honorable John Cooper, Mayor
Metropolitan Government of Nashville - Davidson County
Emel Alexander, Director of Community Development