

Metropolitan Nashville and Davidson County, Tennessee

**Metropolitan Development and Housing Agency
Community Development Block Grant-Disaster
Recovery (CDBG-DR)**

IMPLEMENTATION PLAN

December 21, 2023

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A. Overview

In 2021, Nashville and Davidson County, Tennessee, suffered severe storms resulting in widespread flooding and loss of life. In response, FEMA issued disaster declaration 4601-DR-TN allowing federal recovery funds to become available to the County. In the spring of 2022, the U.S. Department of Housing and Urban Development (HUD) announced that the Metropolitan Development and Housing Agency (MDHA) would receive \$5,151,000 in funding to support long-term recovery efforts in Nashville-Davidson County following disaster declaration 4601-DR-TN. On November 3, 2022, HUD announced a supplemental allocation of \$3,367,000 for the same disaster event. These funds are accounted for in the County's CDBG-DR Action Plan, bringing the total allocation for CDBG-DR funds to \$8,518,000. The Federal Register notices for both allocations specify that 100% of the funding must be utilized in the Most Impacted and Distressed (MID) area, which HUD identified as ZIP Code 37211 in a memorandum to the County in March 2022.

To manage the CDBG-DR funds and associated risks, HUD requires each grantee to demonstrate sufficient capacity through the development and submission of an Implementation Plan which must be developed in accordance with criteria outlined in the Allocating Federal Register Notice and the Consolidated Notice.

This plan submitted by MDHA outlines how the CDBG-DR program will be overseen, managed, and implemented, and establishes how the HUD funds will be used to address remaining unmet needs in Nashville-Davidson County, Tennessee.

1. Proposed Allocation – Multifamily Affordable Rental Housing Facility

The MID experienced severe flooding, primarily impacting rental properties in residential areas. This resulted in the displacement of a significant number of tenants residing in the impacted units. Infrastructure damage was nominal. Impacts from the storm event were made even more severe by the fact that the County already suffers from an acute shortage of affordable housing as identified in the unmet needs analysis. Therefore, to address direct impacts from the storm event and to help with the severe shortage of affordable housing, the entire allocation of CDBG-DR funding will be utilized for the creation of a multifamily affordable housing facility. MDHA anticipates that approximately 24 units of housing will be created with all units being made available to LMI qualified tenants. The required 15% mitigation set aside will be added to the housing activity to incorporate resilient features.

Table 1 summarizes unmet needs and the proposed use of CDBG-DR funds.

Table 1 – Allocation Table				
Category	Remaining Unmet Need	% of Unmet Need	Program Allocation Amount	% of Program Allocation
Administration			\$425,900	5%
Planning			\$425,900	5%
Housing	\$1,171,800,000***	100%	\$6,555,200	77%
Infrastructure				
Economic Revitalization				
Public Services				
Mitigation			\$1,111,000	13%**
Total			\$8,518,000	100%

*Data Sources: MDHA

**The Federal Register specifies that 15% of assistance be set aside for mitigation activities. The 15% is calculated from the original Allocation for Unmet Need (\$4,479,000) on Page 31638, Table 3 of the Federal Register, which is then added to that amount for a new total of \$5,151,000. The additional funding of \$3,367,000 makes a similar assumption, therefore the total percentage of program allocation for mitigation is 13%, while the CDBG-DR set aside for mitigation is actually 15% of the Allocation for unmet needs.

*** Data Source: Affordable Housing Task Force Report-2021. Unmet need estimate is based on the current 2-year lag in affordable housing unit production to address total projected 10-year affordable housing need.

B. Capacity assessment

1. Lead Agency

MDHA will be the lead principal agency responsible for implementing the CDBG-DR award and is the lead agency for the administration of all Community Planning and Development grant funds in Nashville and Davidson County. As an established agency, with a myriad of experience in managing and implementing federal programs, it has the management capacity and experience to manage the CDBG-DR program, specifically within its Community Development Department.

MDHA intends to procure one or more developers to build approximately 24 units of new rental housing within the MID using this allocation of CDBG-DR funding. At least 70% of the CDBG-DR funds will benefit LMI residents.

a) Lead Agency Structure and Experience

The Community Development Department is responsible for the CDBG-DR funds and is managed by Emel J. Alexander, Director of Community Development and Treva K. Gilligan, Assistant Director of Community Development. The Community Development Department currently administers four programs from the U.S. Department of Housing and Urban Development (HUD) to benefit low- and moderate-income individuals and areas: the Community Development Block Grant (CDBG), the HOME Investment Partnerships Program (HOME), the Emergency Solutions Grant (ESG), and the Housing Opportunities for Persons with AIDS (HOPWA) program. These programs receive annual funding, and their utilization priorities are outlined in the Consolidated Plan. MDHA’s Community Development Department was also responsible for administering additional special grant allocations of CDBG, ESG, and HOPWA related to the CARES Act. These

special allocations are now winding down, freeing up staff capacity for support on this 2021 CDBG-DR allocation. Additionally, the Department is responsible for the 2010 \$33 million+ CDBG-DR grant received due to severe flooding, which all projects have been completed. They are in the process of closing out the 2010 CDBG-DR grant, with assistance being provided through a HUD Technical Assistance Provider. The Department's 18 staff have multiple years of combined experience in administering HUD programs with a wide range of transferable activities that will be beneficial in implementing the 2021 CDBG-DR grant. Training will be sought as needed on current CDBG-DR requirements.

Six (6) staff members from the Community Development Department will be directly involved in implementing the CDBG-DR grant. Their responsibilities associated with the same are listed in the chart on page 10.



(5) staff listed in the chart on page 10 have the following experience related to the 2010 CDBG-DR grant:

- Angela Harrell, preparing and submitting Quarterly Performance Reports (QPRs) in DRGR;
- Jeff Cardwell, Environmental Review Clearance;
- Conor O'Neal prior monitoring of The Housing Fund CDBG-DR activities and staff liaison for HUD 2021 monitoring for the 2010 CDBG-DR grant, which resulted in no findings (a copy of the monitoring letter will be provided upon request);
- Melinda Hatfield, Director of Finance, maintaining general ledger and accounts payable/receivables; and
- Charles Pope, Senior Accountant processing payment and drawdown of CDBG-DR funds.

Community Development staff will also receive the following support from the Finance Department, Construction and Procurement Department, Legal, and Communication staff as needed:

The Finance Department manages the Agency's resources by developing appropriate budget practices, handling audits, implementing treasury management strategies, and ensuring proper accounting and internal controls to protect the Agency's assets. They also work with the Community Development Department to review invoices, maintain accounts payables/receivables, payroll records, and draw CDBG-DR funds from the Treasury. They ensure compliance with Federal, state, and local financial regulations. This is accomplished through financial controls, monitoring, and coordination of external audits. As stated in the prior paragraph, Melinda Hatfield, Director of Finance, and Charles Pope, Senior Accountant, have prior experience with CDBG-DR funds. Training will be sought as needed on current CDBG-DR requirements.

The most recent MDHA audit report can be accessed at: <https://www.nashville-mdha.org/wp-content/uploads/2023/06/MDHA-September-30-2022-Final-Audit-Report.pdf>

The Construction and Procurement Department provides construction management services for all MDHA projects, including those funded with HOME and CDBG. It will provide this service for the CDBG-DR funded housing development project(s). These services include inspections during construction, approval of AIA draw requests, and monitoring and signing off that Davis-Bacon and Section 3 Requirements have been met. The Procurement arm of this department is responsible for solicitations issued for professional services and construction contracts for MDHA. They ensure MDHA Procurement Policies, the federal regulatory requirements of 2 CFR 200, and state procurement requirements are met. They will provide these services related to the CDBG-DR RFA to procure a developer to construct any proposed CDBG-DR funded affordable housing development. Construction/Procurement Department Staff don't have specific CDBG-DR experience but have experience with CDBG, HOME, Davis-Bacon & Section 3, which will easily transfer to CDBG-DR. Training will be sought as needed on current CDBG-DR requirements.

The Legal Department provides advice to MDHA departments to ensure that sub-recipient and contractor/developer agreements/legal instruments comply with the terms of the funding source, and are lawfully enforceable, and comply with Federal and state laws. They will provide these services related to CDBG-DR funded sub-recipient contractor/developer agreements, as applicable. Legal Department staff have no prior CDBG-DR experience but are experienced in reviewing legal instruments for the CDBG and HOME programs, which will easily transfer to CDBG-DR.

The Communication Department maintains MDHA's website and supports the communication needs of all MDHA Departments by providing a comprehensive communication strategy relative to all program activities. They will provide these services for the Department of Community Development related to the CDBG-DR program.

The Assistant Director of Community Development and the Community Development Engagement & Strategic Partnership Manager provided MDHA's Assistant Director of Communications with the requirements from the criteria in the 6364 Federal Register for maintaining the CDBG-DR portion of the website and has stressed the importance of adhering to this criteria. Communication Department staff have no prior CDBG-DR experience. However, staff in the Community Development charged with implementing the CDBG-DR program will keep Communication Department staff updated on the CDBG-DR requirements for the website and provide them with the documents that need to be posted to meet the requirements promptly as they become available. Training will be sought as needed on current CDBG-DR requirements.

2. Capacity

The MDHA Executive Office and five primary departments; Affordable Housing, Rental Assistance, Construction/Procurement, Community Development, and Urban Development, are supported by a central office that provides the functions of finance, communications, human resources, and IT to aid in the delivery and administration of the Agency's programs.

MDHA's responsibilities are overseen by a seven-member Board of Commissioners, appointed by the Mayor and confirmed by the Metro Council of Nashville and Davidson County, which holds

the Executive Director responsible for policy implementation and development and the operation of all programs and projects. The Board meets monthly, establishes policy, approves budgets, and provides guidance to staff within federal, state, and local law frameworks.

The Executive Office staff, including the executive director, deputy executive director, chief operating officer, chief of staff, communications, general counsel and support staff, manage these responsibilities.

It was determined that \$7,666,200 (Housing and Mitigation) of CDBG-DR funding would be utilized to create multifamily affordable rental housing, to address the direct impacts of the storm event, and help with the severe shortage of affordable housing.

A core component of MDHA's mission is to create quality affordable housing opportunities, as such the proposed CDBG-DR development aligns and complements MDHA's current work. Additionally, the responsibilities associated with the implementation of the 2021 CDBG-DR grant will closely follow existing responsibilities and processes used for projects funded by CDBG, HOME, and Housing Trust Fund, including project oversight (conception to completion, occupancy, and compliance monitoring), RFA procurement, contracting, construction monitoring, and financial reporting.

MDHA's Executive Director determined that the required tasks would fall on the Department of Community Development, Construction/Procurement, and Finance and requested those Department Directors review current staffing and determine if the anticipated work associated with implementing the proposed CDBG-DR project could be incorporated into existing workloads or if it presented a capacity gap, i.e.:

- Is current staff fully obligated?
- Is the available staff experienced with federal funds?
- Is the available staff experienced with the type of project to be completed with the CDBG-DR funds?
- Does the staff have the capacity to provide the proper oversight to implement the proposed CDBG-DR project in a timely manner?
- Is any training needed to fulfill the responsibilities of the CDBG-DR grant? If so, what type of training is needed?

Department Directors reviewed projects in the pipeline along with projected completion dates, projects winding down (such as those associated with the CARES Act funds), and new projects coming online, and reported that staff were accustomed to and able to handle the fluctuation in workflow and had the capacity to handle the development project(s) that CDBG-DR funds would support. The CDBG-DR allocation represents 4% increase to MDHA's current multifamily construction pipeline and it is expected to represent 1 -2 projects at the most. As such, the CDBG-DR allocation can be incorporated within MDHA's existing staffing and workflows. See more specifics on staffing capacity and responsibilities in Section C.2. Additionally, additional staff time is expected to be available with some grants/projects pending closeout (2010 CDBG-DR and CDBG-CV).

A further assessment of the Community Development staff determined they have the capacity

and expertise to oversee the procurement process as they are proficient in crafting and issuing Requests for Applications (RFA) to obtain an experienced developer to construct the CDBG-DR funded multifamily affordable housing project(s). The Community Development staff have a strong track record in project implementation, monitoring thru occupancy and closeout due to experience with HOME, prior CDBG-DR and Housing Trust Fund projects. Additionally, MDHA staff in the Construction and Procurement Department will assist with contract negotiations and monitoring/inspecting construction progress including Davis-Bacon and Section 3 compliance. To further support staff management of the program, Community Development staff attended the CDBG-DR problem-solving clinic in Chicago in April 2023, where they attended the one-on-one meeting on Grant Closeout and the general sessions for all participants. Staff have also attended numerous trainings on CDBG regulations, HOME requirements, and affordable housing underwriting. Community Development staff are required to share any pertinent information gleaned from conferences/trainings with other MDHA staff related to program requirements related to their specific areas of responsibility.

MDHA submitted the certification of financial controls and procurement processes and adequate procedures for proper grant management required in III.A.1.a. of the Notice to HUD the first time on July 28, 2022, and a 2nd time with some requested corrections to the Policy and Procedures on October 19, 2022. Email correspondence from HUD on June 5, 2023, stated that the document was approved and no further action was needed.

The capacity of developers will be assessed through the RFA process based on qualifications established in the RFA based on their experience and capacity in the construction of similar federally funded projects and their ability to see it through to completion and project management.

3. Capacity Gaps

Based upon MDHA's review of the capacity as outlined in B.2. funding amount, project type, scale of the project, and existing staff and capability, MDHA has concluded that there are no capacity gaps within the management and implementation structure.

MDHA will continue to assess its internal capacity throughout the life of the CDBG-DR program. If it identifies any gaps or shortfalls in capacity, they will be addressed through staff training, hiring a consultant to supplement staff, or the hiring of new staff as the MDHA determines necessary.

4. Open CDBG-DR Findings

MDHA currently has no CDBG-DR findings. The 2010 CDBG-DR grant is complete and pending closeout. MDHA is working with ICF, a HUD-approved TA provider, to prepare the grant for closeout.

C. Staffing

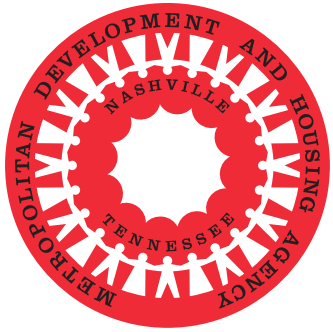
For more than 80 years, MDHA's employees have been serving the citizens of Nashville and Davidson County with pride by creating affordable housing opportunities, supporting neighborhoods, strengthening communities, and contributing to the growth of Nashville.

As outlined in the Capacity Assessment section, the agency has sufficient personnel to handle the added duties associated with the CDBG-DR funds. MDHA provides its team members with a competitive salary, paid retirement, access to health, dental, and vision benefits, and other benefits that promote work-life

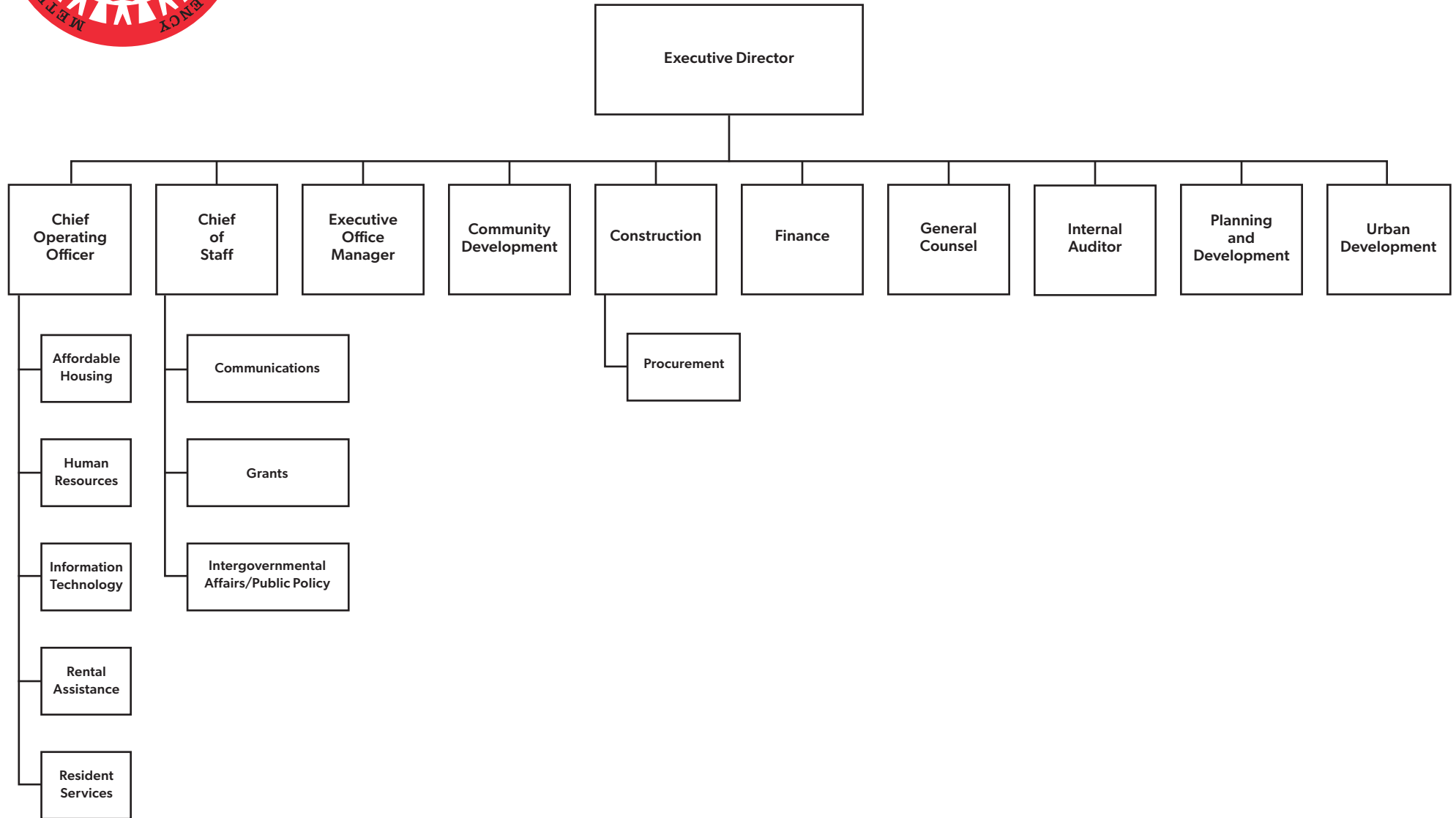
balance.

1. Organizational Charts

MDHA's and the Community Development Department's organizational chart are provided on the following pages. Staff member names with direct responsibilities for implementing the CDBG-DR grant are provided in the Chart on page 10.



Metropolitan Development and Housing Agency




The CDBG-DR grant will be managed by Senior Development Manager for Housing along with the Community Development Program Administrator, with oversight and support from the Assistant Director of Community Development. This team manages the HOME program, the 2010 CDBG-DR grant (pending closeout), a CDBG-CV Facility Renovation project, (also pending closeout), and NSP and Housing Trust fund projects (none currently active). The Senior Development Manager for Housing and the Community Development Program Administrator attended the CDBG-DR problem-solving clinic in Chicago in April 2023 and have also attended numerous trainings on CDBG regulations, HOME requirements, and affordable housing underwriting. Additional support related to the CDBG-DR grant will be provided by MDHA staff in other departments as outlined in the previous section, Part B - Capacity Assessment.

2. Personnel Responsible for Financial Management and Grant Compliance (Tasking and Position Responsible)

Personnel or organizational unit along with contact information responsible managing various aspects of the CDBG-DR grant/project(s) are listed in the table below:

Table 2 - Tasks and Staffing	
Task	Staff/Responsible
a. Financial Management & Grant Compliance Certification	MDHA Director of Finance, Melinda Hatfield, mhatfield@nashville-mdha.org , with support from MDHA Director and Assistant Director of Community Development, Emel Alexander, ealexander@nashville-mdha.org and Treva Gilligan, tgilligan@nashville-mdha.org .
b. Internal Auditor	MCM CPAs & Advisors, LLP an Auditor hired via an RFA process in May 2021, was contracted for a 5-year term to handle the audit requirements of all MDHA’s business units and MDHA will use them to fulfill the requirements of 87 FR 31636, May 24, 2022, Section III.A.1.a(6)(d) for the CDBG-DR grant. The Audit report will be presented to the MDHA Executive Director and the MDHA Board of Commissioners.
c. Organizational Procurement	MDHA Director of Construction and Procurement, Michael Wegerson, mwegerson@nashville-mdha.org .
d. Duplication of Benefits	MDHA Department of Community Development, Senior Development Manager for Housing, Angela Harrell, aharrell@nashville-mdha.org The CDBG-DR funds will be used for the construction of rental housing, which is not a direct benefit activity, However, the financial structure of the project will be reviewed during the course of underwriting to ensure that the full amount of CDBG-DR subsidy is needed.
e. Timely Expenditures	MDHA Director and Assistant of Community Development. Emel Alexander, Director, ealexander@nashville-mdha.org and Treva Gilligan, Assistant Director, tgilligan@nashville-mdha.org

f. Communications/Website Management	MDHA Department of Community Development, Engagement and Strategic Partnership Manager, vacant and MDHA Assistant Director of Communications, Charlotte Weatherington, cweatherington@nashville-mdha.org .
g. Legal	MDHA Legal Counsel, Will Choppin, at wchoppin@nashville-mdha.org .
h. Case management	N/A – This is not a direct benefit activity – the successful developer will use a qualified property management company to handle the leasing of units in the project.
i. Program manager	MDHA Department of Community Development, Senior Development Manager for Housing, Angela Harrell, aharrell@nashville-mdha.org .
j. Staff with experience in housing	MDHA Department of Community Development, Senior Development Manager for Housing, Angela Harrell, aharrell@nashville-mdha.org in coordination with Community Development Program Administrator, Lasheakita Fayne, lfayne@nashville-mdha.org .
k. Request for Applications (RFA) Developer Procurement 	Department of Community Development, Assistant Director, Treva Gilligan, tgilligan@nashville-mdha.org and Angela Harrell, Senior Development Manager for Housing, aharrell@nashville-mdha.org , with support from Christina Holt MaLin, Procurement Specialist, cmacclin@nashville-mdha.org in the Construction and Procurement Department that handles MDHA organizational procurement.
l. Evaluation of Developer proposals received via the RFA process	MDHA Assistant Director or Community Development, Treva tgilligan@nashville-mdha.org , Department of Community Development, Senior Development Manager for Housing, Angela Harrell, aharrell@nashville-mdha.org in coordination with Community Development Program Administrator, Lasheakita Fayne, lfayne@nashville-mdha.org and an independent RFA review committee to be appointed by MDHA’s Executive Director, Dr. Troy D. White, twhite@nashville-mdha.org .
m. Procurement /contract management/approve construction draws	MDHA Director of Construction and Procurement, Michael Wegerson, mwegerson@nashville-mdha.org with support of Contract Compliance Specialist and Construction Project Manager, both TBD.

o. Environmental Review	MDHA Department of Community Development Program, Manager, Environmental Reviews and Program Compliance. Jeff Cardwell, jcardwel@nashville-mdha.org .
p. Finalize Developer Agreement and loan documents to award CDBG-DR funds to successful developer(s)	Department of Community Development, Assistant Director, Treva Gilligan, tgilligan@nashville-mdha.org and Senior Development Manager for Housing, Angela Harrell, aharrell@nashville-mdha.org with support from MDHA Legal Counsel, Will Choppin, wchoppin@nashville-mdha.org
q. Section 3 implementation	MDHA Department of Community Development, Senior Development Manager for Housing, Angela Harrell, aharrell@nashville-mdha.org in coordination with Community Development Program Administrator, Lasheakita Fayne, lfayne@nashville-mdha.org and support Contract Compliance Specialist TBD in the Construction and Procurement Department.
r. Davis-Bacon Compliance	MDHA Director of Construction and Procurement, Michael Wegerson, mwegerson@nashville-mdha.org with support from Contract Compliance Specialist and Construction Project Manager – TBD.
s. Submit, process draw requests for CDBG-DR funds	MDHA Department of Community Development, Senior Development Manager for Housing, Angela Harrell, aharrell@nashville-mdha.org with assistance from Community Development Program Administrator, Lasheakita Fayne, lfayne@nashville-mdha.org .
t. Approve Draw Requests for CDBG-DR funds	MDHA Director and Assistant of Community Development, Emel Alexander, ealexander@nashville-mdha.org and Treva Gilligan, tgilligan@nashville-mdha.org .
u. Draw CDBG-DR funds	MDHA Finance Department Senior Accountant, Charles Pope, cpope@nashville-mdha.org .
v. Enter occupancy data – demographics in DRGR for project closeout	MDHA Department of Community Development, Senior Development Manager for Housing, Angela Harrell, aharrell@nashville-mdha.org with assistance from Community Development Program Administrator, Lasheakita Fayne, lfayne@nashville-mdha.org .
w. CDBG-DR – Compliance Monitoring – pre-construction and post-construction	Department of Community Development, Senior Compliance Specialist, Conor O’Neil, coneil@nashville-mdha.org . will act as internal compliance monitor will fulfill the requirements of 87 FR 31636, May 24, 2022, Section III.A.1.a(6)(a);(b); and (c).
x. Fair Housing Compliance	Senior Development Housing Manager, Angela Harrell, aharrell@nashville-mdha.org with support from MDHA

	Legal Counsel, Will Choppin, wchoppin@nashville-mdha.org .
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The developer(s) and members of the development team(s) awarded CDBG-DR funds to construct the rental housing will be charged with managing the following, pre-construction and post-construction, activities listed in the table below. Support and technical assistance will be provided by MDHA Community Development and Construction and Procurement staff as needed.

Table 3 - Developer Tasks/Responsibilities
a. Site Control/land acquisition
b. Project Design, including mitigation measures/Plans for Permitting/Obtain Construction Permits
c. Hiring General Contractor/finalizing construction contract
d. Finalize/Close on Construction Financing (including CDBG-DR loan)
e. Construction Monitoring – Inspections-draw requests
f. Section 3 reporting
g. Davis-Bacon reporting
h. Obtaining Certificates of Occupancy
i. Lease-up – affirmative marketing – fair housing
j. Tenant income certification
k. Provide occupancy data – demographics to MDHA Community Development Department for project closeout in CDBG-DR Reporting System
l. Maintaining 95% occupancy
m. Long-term property management/maintenance units and grounds

3. Internal Auditor

MDHA submitted the certification of financial controls and procurement processes, and adequate procedures for proper grant management (Policies and Procedures) required in III.A.1.a. of the Notice to HUD on July 28, 2022. MDHA resubmitted the Policies and Procedures with HUD requested corrections on October 19, 2022. Email correspondence from HUD on June 5, 2023, stated that the document was approved, and no further action was needed. This Certification provided information to demonstrate that an internal auditor and responsible audit staff reported independently to MDHA’s Board of Commissioners. This auditor will be conducting ongoing financial reviews of MDHA activities, as described in the Policies and Procedures document, throughout the life of the CDBG-DR allocation.

MDHA is a public housing authority incorporated in 1938 under the laws of the State of Tennessee and is a discretely presented component unit of the Metropolitan Government of Nashville and Davidson County. MDHA meets the definition of a special purpose government. MDHA (or its discretely presented component units) currently owns and manages approximately 6,514 subsidized, workforce and market rate units at 35 separate developments; administers approximately 7,663 Section 8 Vouchers, including tenant-based assistance, Moderate Rehabilitation units, and Shelter Plus Care units; and administers all HUD Community Development and Planning Grants for the Metropolitan Government of Nashville-Davidson County. MDHA has annual operating revenues and expenditures in excess of \$100 Million.

MDHA currently uses MCM CPAs & Advisors, LLP, an Auditor hired via an RFA process in May 2021, that was contracted for a 5-year term to handle the audit requirements of all its business units and will use them to fulfill the requirements of 87 FR 31636, May 24, 2022, Section III.A.1.a(6)(d) for the CDBG-DR grant. They are a qualified firm of certified public accountants and use generally accepted auditing standards as set forth by the American Institute of Certified Public Accountants, the standards set forth for financial audits in Government Auditing Standards issued by the Comptroller General of the United States, and the audit requirements under the Uniform

Guidance at 2 CFR 200. Melinda Hatfield, Director of Finance at MDHA, will specify that disbursements of the CDBG-DR grant be reviewed as part of the annual audit. All internal audit reports will be presented to MDHA's Executive Director and Board of Commissioners as part of the Annual Audit process. As part of this review, they will be required to review and report any suspected incidences of fraud in the CDBG-DR activities in accordance with the Fraud Policy adopted by MDHA's Board of Commissioners which is attached as Appendix B to the CDBG-DR Policies and Procedures manual that was approved by HUD October 19, 2022, and approved by HUD via email correspondence on June 5, 2023.

4. Technical Assistance

It is MDHA's policy that County staff engaged in managing CDBG-DR projects, programs, and funds, will be provided training to effectively perform roles and responsibilities assigned to them in conformity with programmatic regulations. Any staff hired to work on the CDBG-DR program after Action Plan submission will be provided training by current CDBG-DR staff members familiar with the CDBG-DR program activity and will be required to attend CDBG-DR related trainings. Staff in the Community Development Department are cross trained to ensure projects don't get stalled in the case of turnover. In addition, MDHA has requested extended technical assistance from HUD that can support individuals currently not employed.

As part of the CDBG-DR RFA process, staff will hold a pre-application meeting for interested developers to provide information on the CDBG-DR requirements related to any proposed CDBG-DR activities. Additionally, once a project is selected for funding, staff will work with developers to ensure they are aware of CDBG-DR requirements.

D. Internal and Interagency Coordination

1. Internal Communication

The Community Development Department staff, as the project lead, is housed in the same building as Construction and Procurement department staff, which also handle procurement. It is the Standard Operating Procedure (SOP) for staff from the Community Development and Construction and Procurement departments to hold a pre-construction conference with developers and contractors to explain and programmatic and regulatory requirements related to CDBG-DR funded projects. The pre-construction meeting will address a variety of issues including inspections, draw requests, safety, and Davis-Bacon and Section 3 requirement. Additionally, Community Development and Construction and Procurement staff will also hold monthly construction progress meetings to discuss any issues, answer any questions and review timelines to ensure the project remains on schedule. Community Development staff have established a phone conference and report out on the project status every Monday. Persons responsible for Environmental Review Clearance/Compliance and Compliance Monitoring are located in the Community Development Department and report out on projects every Monday.

2. Subrecipient Communication

MDHA will not use subrecipients for this CDBG-DR project. Staff responsible for project implementation will communicate with the selected developer(s) as described above as necessary as issues arise. This communication will take place as part of ongoing construction and project progress monitoring and as part of CDBG-DR draw request approvals until the project is complete.

3. Communication in Support of Planning Consistency

Since the CDBG-DR funded recovery activity is limited to the development of a multifamily affordable housing facility, consultation during the CDBG-DR planning process was focused housing efforts. MDHA Community Development staff consulted with the Housing Division of Metro-Nashville's Planning Department which coordinates local and regional planning efforts. MDHA sought to identify what housing projects may be most needed and would be most effective in addressing both recovery needs and the ongoing affordable housing shortage in the County. MDHA Community Development staff and the Housing Division both concluded that development of a multifamily affordable housing would be the most effective method to address both the affordable and recovery housing needs and remain consistent with local and regional planning efforts.

MDHA also solicited input on the development of the Action Plan via an online survey. 62.5 % of the 32 respondents resided in the 37211 zip code, which was the most impacted distressed area (MID). 97% of 31 respondents ranked the greatest need in the MID, as affordable multi-family rental housing.

MDHA will ask a representative from Metro's Housing Division to serve on the committee that will review and score proposals submitted by developers who seek CDBG-DR funding during the RFA process. MDHA will continue to keep Metro-Nashville's Planning Department, via communication with its' Housing Division, apprised of the project status during the construction/implementation phase.

4. Consultation with Other Government Agencies

During the development of the CDBG-DR Action, MDHA Community Development staff and the consultant working on the Action Plan consulted with Metropolitan Nashville-Davidson County Office of Emergency Management (OEM) regarding the administration of FEMA funds in addition to disaster-affected citizens, stakeholders, local governments, public housing authorities, and other affected parties in the surrounding geographic area to ensure consistency of disaster impacts identified in the plan, and that the plan and planning process was comprehensive and inclusive.

Consultation with the Nashville-Davidson County Office of Emergency Management (OEM) confirmed that it was actually storm related flooding that caused all disaster related impacts in the MID Area as confirmed by FEMA damage assessment data and other damage records collected by (OEM), information provided by interviewing County staff and non-profit service providers including VOADs (Voluntary Organizations Active in Disaster) and that the flooding resulted in the complete destruction of a number residential rental units and the unfortunate loss of human life.

Formal records of impacts and damages to property and structures was collected by MDHA and included data from FEMA, SBA and the County OEM. FEMA data was made available to MDHA while SBA data needed to be collected from SBA's website. OEM provided their data on flooded parcels to MDHA directly. Information made available by FEMA did not include impacts to non-residential properties, however, data collected by OEM and SBA did indicate impacts to commercial properties and in both cases residential properties significantly outnumbered commercial properties. Information provided by FEMA indicated that they collected information on 387 residential structures but only 128 of the properties they surveyed experienced real property damage, however, many more did experience personal property damage or loss. Impact data collected by the County OEM included damage to all types of properties, not just those for residential use. The County OEM impact data recorded 1,350 properties as flooded by the storm event. Approximately 467 (36%) of the properties were located in the MID Area with 439 (94%) of them being residential properties. SBA's data included information on 29 total properties with 22 (76%) being residential and 7 being businesses.

After reviewing the data provided, it was determined that the land use type suffering the greatest impacts in the MID Area was, by far, residential properties.

Building Standards and Consultation with Metro Nashville-Davidson County Department of Codes and Building Services

During the design and construction of the proposed affordable housing development, MDHA and any chosen developer, contractor and architect will coordinate with the Metro Nashville-Davidson County Department of Codes and Building Services to ensure the development is built in accordance with all modern building codes and all other applicable codes, standards, and ordinances.

MDHA will closely monitor the project during construction to verify that quality materials and standards are being utilized, that all necessary permits and approvals are in place, elevation requirements are met, and that green building standards are being incorporated when possible and cost-effective.

Elevation standards:

Any CDBG-DR funded affordable housing development will be required to adhere to the following

For new construction, repair of substantially damaged, or substantial improvement structures principally for residential use and located in the 1 percent annual (or 100-year) floodplain must be elevated with the lowest flood, including the basement, at least two feet above the 1 percent annual floodplain elevation.

Mixed-use structures with no dwelling units and no residents must be elevated or floodproofed up to at least two feet above base flood elevation.

If a structure is located in a 500-year floodplain, the structure must be elevated three feet above the 100-year floodplain.

MDHA will not locate its affordable housing development project in an area identified as being located in located in the 1 percent annual (or 100-year) floodplain

Environmental Concerns

As potential sites for the proposed housing development are identified through the RFA process, MDHA will conduct an internal review to confirm that the locations of any projects don't pose undue risk to populations for whom the housing is being developed. This includes ensuring that sites are not in areas that are at increased risk of impacts from natural disasters that the area is likely to experience based upon the analysis conducted of the hazard mitigation plan, which is included in the approved CDBG-DR Action Plan.

Once a site for the project is determined through the RFA process MDHA will conduct an environmental review which will include an evaluation based on environmental justice which includes considering threats to protected classes and vulnerable populations.

E. Timeline

The timeline for implementation of the CDBG-DR program will be as follows:

Tasks by Functional Area		Begin	End	Status
1 Program Operations				
a.	Designate staff			Complete
b.	Environmental Review is completed for Exempt Activities	Feb-24		
c.	Action Plan Approval by HUD	Nov-23		
d.	Grant Agreements Received from HUD	Jan-24		
2 Training				
a.	Train staff in CDBG-DR overview courses and program-specific policies and procedures/systems	Apr-23	Dec-24	In Process
3 Policy				
a.	Update CDBG-DRGR Policy and Procedure Manual to be specific for the implementation of Activities in Action Plan	Jan-24	Mar-24	
4 Procurement				
a.	Draft and Finalize Request for Applications (RFA) to Seek Developers and projects for the use of CDBG-DR funds	Feb-24	Apr-24	
b.	Advertise RFA to Seek Developers with eligible projects for the use of CDBG-DR funds	May 24	Aug-24	
c.	Hold a pre-application meeting to respond to Developer Questions regarding RFA	May-24		
d.	Issue written responses to questions received at and after the pre-application meeting prior to the deadline for the same	May-24		
e.	Appoint an RFA Evaluation Committee to review and score applications received in response to the RFA based on criteria in the RFA to award funds for projects	Aug-24	Sept-24	
f.	MDHA Board approves award of funds for CDBG-DR funds to project(s) recommended by RFA Review Committee	Nov-24		
g.	Issue Conditional Commitment Letter outlining items to be provided to finalize the developer agreement.	Nov-24		

5 Environmental Review				
a.	Environmental Reviews for a project receiving awards of CDBG-DR funds	Sep-24	Apr-25	
b.	Request Release of Funds from HUD	Apr-25	May-25	
c.	Execute Authorization to use Grant Funds	Jul-25	Jul-25	
6 Contract Management , Loan Closing &-Construction Monitoring				
a.	Finalize Developer Agreement after RROF received from HUD	Aug-25	Sep-25	
b.	Close on all Financing, including CDBG-DRGR Loan	Oct-25	Oct-25	
c.	Preconstruction Conference to go over DB, Section 3, etc.	Nov-25	Nov-25	
d.	Commencement and Ongoing Construction, progress inspections, and approve construction draws	Dec-25	Jan-27	
e.	Construction Completion and Leasing/Sales	Jan-27	Mar-27	
7 Financial Management				
a.	Draw CDBG-DR funds for costs incurred for planning and Action Plan Development and on-going program administration costs	Jan-24	Dec-28	
a.	Process Payment for Construction and Draw CDBG-DR funds for reimbursement	Dec-25	Jan-27	
8 Compliance and Monitoring				
a.	Monitoring in accordance with CDBG-DRGR Policy and Procedures Manual and HUD monitoring checklists.	Dec-25	Jan-45	
b.	Closeout	June-27	Dec-28	