Resolution No. RS_____

A resolution authorizing the Metropolitan Mayor to submit Substantial Amendment Two and the 2020-2021 Annual Update to the 2018-2023 Consolidated Plan for Housing and Community Development to the U.S. Department of Housing and Urban Development.

WHEREAS, the U.S. Department of Housing and Urban Development ("HUD") requires local governments seeking federal assistance through the Community Development Block Grant ("CDBG"), HOME Investment Partnerships ("HOME"), Emergency Solutions Grant ("ESG"), and Housing Opportunities for Persons with AIDS ("HOPWA") programs to develop a Five Year Consolidated Plan for Housing and Community Development; and

WHEREAS, by Resolution R94-1396, the Metropolitan Council designated the Metropolitan Development and Housing Agency ("MDHA") as the lead agency responsible for the preparation of the Five Year Consolidated Plan for Housing and Community Development for The Metropolitan Government of Nashville and Davidson County; and

WHEREAS, the Metropolitan Council approved Ordinance BL2018-1246 authorizing the Mayor to submit the 2018-2023 Consolidated Plan for Housing and Community Development; and

WHEREAS, HUD requires annual updates to the Five Year Consolidated Plan provided that the public participation process as outlined in the Consolidated Plan is followed; and

WHEREAS, the Public Comment Period for Substantial Amendment Two and the 2020-2021 Annual Update began on March 10, 2020, and concluded on April 10, 2020, and a virtual public hearing was held on April 9th 2020 via gotowebinar.com; and

NOW, THEREFORE, BE IT ENACTED BY THE COUNCIL OF THE METROPOLITAN GOVERNMENT OF NASHVILLE AND DAVIDSON COUNTY:

Section 1. The Metropolitan Council adopts Substantial Amendment Two and the 2020-2021 Annual Update to the 2018-2023 Consolidated Plan for Housing and Community Development, attached hereto and made part of this Resolution, and that the Metropolitan Mayor is authorized to submit the Substantial Amendment and Annual Update to HUD; and

Section 2. Substantial Amendment Two allows: 1) Community Development Block Grant (CDBG) funds allocated for Weatherization Assistance to serve homeowners whose incomes are at or below 80% of the Area Median Income (AMI) limit per CDBG income guidelines; 2) Provides amended language to the Citizen Participation Plan contained in Appendix A of the Consolidated Plan to clarify that the criteria for a substantial amendment is a fiscal change in any program/project that is increased or decreased by more than 25% of the total HUD allocation of CDBG, Home Investment Partnerships Program (HOME), Emergency Solutions Grant (ESG) and Housing Opportunities for Persons with Aids (HOPWA) of the effected program year with the

exception as noted. The Citizen Participation Plan, as amended, is included as Appendix G to the Annual Update for Program Year 3; and 3) Amend language to the description section of the Strategic Plan (SP) 25 Priority Need #3 –Retain Affordable Housing Stock of the Consolidated Plan to clarify that the amount of CDBG funds to be allocated to this Priority Need will be a majority of the balance of funds from the annual allocation after deductions for the 20% allocation for Administrative Activities and 15% for Public Service Activities; and

Section 3. The Annual Update includes a description for the expenditure of Community Development Block Grant ("CDBG"), HOME Investment Partnerships Program ("HOME"), Emergency Solutions Grant ("ESG"), and Housing Opportunities for Persons with AIDS ("HOPWA") funds for the 2020-2021 Program Year (June 1, 2020-May 31, 2021); and

Section 4. The Metropolitan Development and Housing Agency is authorized to administer the Consolidated Plan on behalf of the Metropolitan Government of Nashville and Davidson County; and

Section 5. The local match required for the Emergency Solutions Grant will be provided by local non-profit organizations selected as sub-grantees. The twenty-five percent local match for the HOME Investment Partnerships Program will be provided by non-federal funds utilized for HOME projects as well as value of donated land or improvements associated with HOME-funded projects, or by other eligible methods as provided in the HOME regulations; and

Section 6. Funding amounts in the Annual Update are based upon the formula allocations released by HUD on February 28, 2020. Any changes to project budgets; funding priorities; the addition of new activities or the deletion of activities shall be considered criteria for a substantial amendment and be subject to the Citizen Participation Plan described in the 2018-2023 Consolidated Plan; and

Section 7. The Metropolitan Council appropriates funds for projects described in the 2020-2021 Annual Update but expressly withholds any approval for the expenditure of CDBG funds for capital improvement projects. All requested expenditures for capital improvement projects shall be submitted to the Council for final approval by Resolution. And further, detailed project plans for capital improvements shall be on file in the Community Development Department of MDHA at the time of the filing of the Resolution; and

Section 8. The expenditure of CDBG, HOME, ESG, and HOPWA funds shall be in accordance with applicable federal regulations and reporting standards pertaining to the procurement of goods and services from women-owned, minority-owned, and small businesses and low-income individuals; and

Section 9. CDBG, HOME, ESG, and HOPWA funds shall not be used for any property acquisition for which the power of eminent domain is utilized by MDHA, which is restricted by federal law; and

Section 10. This Resolution shall take effect from and after its passage, the welfare of the Metropolitan Government of Nashville and Davidson County requiring it.

APPROVED by Metropolitan

Development and Housing Agency:

James E. Hawkins

Executive Director

APPROVED AS TO AVAILABILITY
OF FUNDS:

Kevin Crumbo

Finance Director

APPROVED AS TO LEGALITY OF
FORM AND COMPOSITION

William H. Ogg

MDHA Attorney

INTRODUCED BY:

Bob Mendes

Burkley Allen

Member(s) of Council

METROPOLITAN NASHVILLE-DAVIDSON COUNTY, TENNESSEE

SUBSTANTIAL AMENDMENT 2
TO THE
2018-2023 CONSOLIDATED
PLAN
FOR
HOUSING AND COMMUNITY
DEVELOPMENT
AND
2020-2021 ANNUAL UPDATE
FOR
PROGRAM YEAR THREE
For the period June 1, 2020 – May 31, 2021

Prepared by:

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

On Behalf of:

The Metropolitan Government of
Nashville and Davidson County
Updated April 13, 2020

Substantial Amendment 2 to the 2018-2023 Consolidated Plan

And

The 2020-2021 Annual Update to the 2018-2023 Consolidated Plan

(2020 Action Plan) Program Year Three

Executive Summary ES1

Action Plan AP1

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 Notice

Appendix E – Summary of Public Comments and MDHA Responses

Appendix F – Fair Housing Plan

Appendix G – Citizens Participation Plan

Exhibits:

Exhibit 1 – Determining a Census Tract Number

Exhibit 2 – Notice of 2020 Allocations

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 (≤80% of the area median income) or low income areas.

In addition, Metro Nashville-Davidson Counts was impacted by an EF-3 tornado on March 3, 2020. Based on initial assessments conducted by Metro Codes Department, 771 homes and businesses were destroyed by the tornado. Another 1,194 properties sustained more minor damages. The Action plan priorities residents and projects impacted by the March 3, 2020 tornado.

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

The current Five Year Plan covers the period June 1, 2018 through May 31, 2023. The Plan is updated each year (Annual Update) to reflect proposed activities and goals for the program year (Action Plan). Annual Updates/Action Plans serve as Nashville's application for federal funds each year. This is the Program Year (PY) 3 (2020) Action Plan for the period June 1, 2020 through May 31, 2021. Concurrent with this Action

Plan, MDHA has prepared Substantial Amendment 2 to the Consolidated Plan to provide the following:

- Allow CDBG funds allocated for Weatherization Assistance to serve homeowners whose incomes are at or below 80% of AMI limit as per CDBG income guidelines; and
- Provide amended language to the Citizen Participation Plan contained in Appendix A of the Consolidated Plan to clarify that the criteria for a substantial amendment is a fiscal change in any program/project that is increased or decreased by more than 25% of the total HUD allocation of CDBG, HOME, ESG and HOPWA of the effected program year with the exception as noted. The Citizen Participation Plan, as amended, is included as Appendix G to the Annual Update for Program Year 3.

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

MDHA received notification from HUD on February 28, 2020 of the 2020 formula grant allocations and the information in this Action Plan has been updated based on the actual dollar amounts to be received. In addition, approximately $427,383 in CDBG program income is expected to be received during the 2020 PY and approximately $316,877 in HOME program income is expected to be available to allocate to projects during the 2020 PY. Therefore, anticipated resources are as follows:

PROGRAM YEAR (PY) 3 ANTICIPATED RESOURCES			
Grant	**2020 Annual Allocation**	**Estimated Program Income**	**Total**
CDBG	$ 5,313,699.00	$ 427,383.00	**$ 5,741,082.00**
ESG	$ 449,229.00	$ 0.00	**$ 449,229.00**
HOME	$ 2,591,602.00	$316,877.00	**$ 2,908,479.00**
HOPWA	$ 1,547,366.00	$ 0.00	**$ 1,547,366.00**
TOTAL	**$ 9,901,896.00**	**$ 744,260.00**	**$ 10,646,156.00**

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 can not 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 has been sent to the HUD Regional Office. The final allocations for 2020 ESG and HOPWA activities – other than those directly undertaken by MDHA staff – will be determined via the Request for Application (RFA) process and demand for funding for projects, subject to regulatory caps.

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

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

Priorities of the Plan are to:

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

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

The table below summarizes the proposed activities funded during the 2020 PY to address Consolidated Plan priorities.

Priority 1	Increase the number of decent, safe affordable units and help LMI households access affordable housing.
Activity	**New Construction**
HOME	New Construction - Rental
HOME	New Construction – Owner
HOME	New Nonprofit Partner Set-aside
Activity	**Address Housing Barriers**
CDBG	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	Targeted Homeowner Rehabilitation (Napier-Sudekum Choice Neighborhoods Planning Area – preference given to victims of March 3, 2020 Tornado)
CDBG	Homeowner Rehabilitation (Housing Target Areas – preference given to victims of March 3, 2020 Tornado)
CDBG	Weatherization Assistance (Countywide – preference given to victims of March 3, 2020 Tornado)
CDBG	Accessibility Rehabilitation (Countywide – preference given to victims of March 3, 2020 Tornado)
CDBG	HVAC Replacement (Countywide – preference given to victims of March 3, 2020 Tornado)
CDBG	Roof Replacement (Countywide – preference given to victims of March 3, 2020 Tornado)
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)
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 (preference will be given to projects/facilities damaged by March 3, 2020 Tornado)
Priority 6	**Undertake grant management, planning, and other eligible administrative tasks authorized under CDBG, HOME, ESG, and HOPWA.**
Activity	**Provide oversight and management of grants.**
CDBG	Administration and Planning
HOME	Administration
ESG	Administration
HOPWA	Administration

3. Evaluation of past performance

Each year, MDHA reports its progress in meeting the five-year and annual goals in the Consolidated Annual Performance and Evaluation Report (CAPER). This report is required to be submitted to HUD within 90 days after the PY ends. Previous years' CAPERs are available on MDHA's website: http://www.nashville-mdha.org/?p=1857. MDHA has consistently satisfied program mandates and has successfully targeted funds to benefit low- and moderate-income persons and neighborhoods. In its most recent letter approving the 2018 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 2020 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 2019 program year, MDHA staff consulted with stakeholders, non-profits, project sponsors, and the Mayor's office for suggestions to improve or expand programs for PY 2020. Additional input on the development of the draft Plan was obtained through three consultation sessions with local stakeholders. Comments on the draft Action Plan were obtained during the 30-day public comment period (March 10 through April 10, 2020) and at the virtual public hearing that was held on April 9, 2020. Details about the public hearing and how the public can submit comments are provided in the Public Notice (Appendix D). An in person public hearing, scheduled for March 23, 2020 had to be cancelled due to the "Safe at Home" edict that was issued for Metro Nashville-Davidson County due to the COVID-19 pandemic.

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 2020 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 is provided in Appendix C.

A summary of public comments on the draft 2020-2021 Action Plan received at the virtual public hearing held on April 9, 2020 is provided in Appendix E. An in person public hearing, scheduled for March 23, 2020 had to be cancelled due to the "Safe at Home" edict that was issued for Metro Nashville-Davidson County due to the COVID-19 pandemic.

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

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

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

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

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

Table 1 – Responsible Agencies

Narrative

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

Consolidated Plan Public Contact Information

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

1. Introduction

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

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

Throughout the 2019 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 2020. Additional input on the development of the draft Plan was obtained through three consultation sessions with local stakeholders. Comments on the draft Action Plan were obtained during the 30-day public comment period and at the public hearing held during the comment period.

A summary of the commentary from the three consultation sessions is provided in Appendix C; and a summary of comments received orally at the public hearing and in writing during the public comment period on the draft Action Plan is provided in Appendix 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(l)).

Public Housing Authority

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

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

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

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

In addition, a partnership between MDHA and HID allows for the utilization of up to 18 housing choice vouchers per month to support housing people experiencing literal homelessness. The goal is to focus on the most vulnerable populations who have experienced or are at risk of chronic homelessness and offer permanent supportive housing. Since this partnership began in May 2013, over 1,139 people have received a voucher.

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

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

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

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

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

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

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

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

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

Additionally, the CoC received a renewable grant to fund two (2) CE Coordinators who provide education to the community at large and engage any person who may be experiencing a housing crisis, who has yet to be connected to services.

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

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

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

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

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

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

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

In efforts to further align ESG with CoC priorities, there has been increased coordination/alignment between the CoC and ESG performance standards. The standing CoC CE Committee joined with an ad hoc CoC Written Standards Committee and updated the Nashville-Davidson County CoC & ESG Written Standards, adopted by the CoC Homelessness Planning Council in September 2019. MDHA is beginning to incorporate those standards as a part of its ESG application process. In 2019, members of the CoC's Performance Evaluation Committee (PEC) also served on the ESG Review Committee. Discussions are underway to potentially merge the PEC and ESG review committees to review proposed projects. Unfortunately, because of the timing of federal funding announcements, the funding cycles for the CoC and ESG are not aligned to allow for complete coordination.

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

The goals and duties of the HMIS Committee include:

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

HID and MDHA staff closely collaborate to ensure the components of the CE are fully integrated into HMIS. In addition, the joint staff conducted combined HMIS and CE trainings throughout 2019 for housing navigators and HMIS users. Metro government agencies have increased their communications through the creation of an interdepartmental council, which actively moved the City's response to homelessness from an enforcement-only approach to an engagement-first approach and focuses on linking people to needed services rather than arresting them for essentially being homeless. These efforts increase community outreach and education about streamlining processes and aligning funding to help more people.

While a lot of work has been done around the alignment of procedures, policies, and resources, the opportunity to make a big leap forward to build an efficient systems

approach oriented on providing different options to assist people transition out of homelessness is still in the development phase. The HMIS Oversight Committee has set its sights on identifying areas of improvement, shaping policies and procedures of HMIS, and implementing data quality and privacy plans, etc.

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

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

1	**Agency/Group/Organization**	Inspiritus
	Agency/Group/Organization Type	Other – Religious Organization/NonProfit
	What section of the Plan was addressed by Consultation?	Non-housing Community Development Economic Development
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Prior to drafting the 2020 Annual Action Plan, MDHA held three 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.
2	**Agency/Group/Organization**	Lindsley Avenue Church of Christ
	Agency/Group/Organization Type	Other – Religious Organization/Nonprofit
	What section of the Plan was addressed by Consultation?	Non-housing Community Development Economic Development

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Prior to drafting the 2020 Annual Action Plan, MDHA held three 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.
3	**Agency/Group/Organization**	Affordable Housing Resources
	Agency/Group/Organization Type	Housing
	What section of the Plan was addressed by Consultation?	Housing Needs Assessment Public Housing Needs Non-housing Community Development
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Prior to drafting the 2020 Annual Action Plan, MDHA held three 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.
4	**Agency/Group/Organization**	Renewal House
	Agency/Group/Organization Type	Services – Homeless
	What section of the Plan was addressed by Consultation?	Homeless needs – families with children Non-housing Community Development

		Homelessness Strategy Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Prior to drafting the 2020 Annual Action Plan, MDHA held three 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.
5	**Agency/Group/Organization**	Catholic Charities
	Agency/Group/Organization Type	Services – Homeless
	What section of the Plan was addressed by Consultation?	Homeless Needs – Chronically homeless Homeless Needs – Families with children Homeless Needs – Veterans Homeless Needs – Unaccompanied youth Homeless Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Prior to drafting the 2020 Annual Action Plan, MDHA held three 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.

6	**Agency/Group/Organization**	Centerstone
	Agency/Group/Organization Type	Services – Health (Behavioral)
	What section of the Plan was addressed by Consultation?	Homeless Needs – Chronically homeless Homeless Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Prior to drafting the 2020 Annual Action Plan, MDHA held three 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.
7	**Agency/Group/Organization**	Pathway Lending
	Agency/Group/Organization Type	Community Development Financial Institution
	What section of the Plan was addressed by Consultation?	Non-housing Community Development Economic Development Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Prior to drafting the 2020 Annual Action Plan, MDHA held three 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**	Be a Helping Hand Foundation
	Agency/Group/Organization Type	Housing
	What section of the Plan was addressed by Consultation?	Housing Needs Assessment Anti-Poverty Strategy Public Housing Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Prior to drafting the 2020 Annual Action Plan, MDHA held three 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	**Agency/Group/Organization**	Nashville Public Library
	Agency/Group/Organization Type	Services-Children Services- Education
	What section of the Plan was addressed by Consultation?	Non-housing Community Development Economic Development Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Prior to drafting the 2020 Annual Action Plan, MDHA held three 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.
10	**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?**	Metro Action Commission Other Government - Local Non-housing Community Development Economic Development Anti-poverty Strategy Prior to drafting the 2020 Annual Action Plan, MDHA held three 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.
11	**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?**	Crossroads Camp Other- Nonprofit Non-housing Community Development Economic Development Anti-poverty Strategy Prior to drafting the 2020 Annual Action Plan, MDHA held three 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.
12	**Agency/Group/Organization**	Homeless Advocates
	Agency/Group/Organization Type	Civic Leaders
	What section of the Plan was addressed by Consultation?	Homelessness Needs Homelessness Strategy Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Prior to drafting the 2020 Annual Action Plan, MDHA held three 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.
13	**Agency/Group/Organization**	Community Advocates
	Agency/Group/Organization Type	Civic Leaders
	What section of the Plan was addressed by Consultation?	Non-housing Community Development Economic Development Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Prior to drafting the 2020 Annual Action Plan, MDHA held three 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.
14	**Agency/Group/Organization**	J2K Builders
	Agency/Group/Organization Type	Business Leaders Housing
	What section of the Plan was addressed by Consultation?	Housing Needs Assessment Public Housing Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Prior to drafting the 2020 Annual Action Plan, MDHA held three 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.
15	**Agency/Group/Organization**	Empower Tennessee
	Agency/Group/Organization Type	Civic Leaders
	What section of the Plan was addressed by Consultation?	Anti-Poverty Strategy Housing Needs Assessment Economic Development
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Prior to drafting the 2020 Annual Action Plan, MDHA held three 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.
16	**Agency/Group/Organization**	LDG Development
	Agency/Group/Organization Type	Housing
	What section of the Plan was addressed by Consultation?	Housing Needs Assessment Public Housing Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Prior to drafting the 2020 Annual Action Plan, MDHA held three 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.
17	**Agency/Group/Organization**	Fifteenth Avenue Baptist Community Development Corp
	Agency/Group/Organization Type	Housing
	What section of the Plan was addressed by Consultation?	Housing Needs Assessment Public Housing Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Prior to drafting the 2020 Annual Action Plan, MDHA held three 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.
18	**Agency/Group/Organization**	Street Works
	Agency/Group/Organization Type	Services-Persons with HIV/AIDS
	What section of the Plan was addressed by Consultation?	Non-homeless Special Needs HOPWA Strategy Homeless Needs – Chronically homeless Homeless Needs – Families with children Homeless Needs – Veterans Homeless Needs – Unaccompanied youth Homeless Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Prior to drafting the 2020 Annual Action Plan, MDHA held three 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.
19	**Agency/Group/Organization**	Park Center
	Agency/Group/Organization Type	Services - Homeless
	What section of the Plan was addressed by Consultation?	Non-homeless Special Needs Homeless Needs – Chronically

		homeless Homeless Needs – Families with children Homeless Needs – Veterans Homeless Needs – Unaccompanied youth Homeless Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Prior to drafting the 2020 Annual Action Plan, MDHA held three 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.
20	**Agency/Group/Organization**	Urban Housing Solutions
	Agency/Group/Organization Type	Services – persons with HIV/AIDS Housing Services - Homeless
	What section of the Plan was addressed by Consultation?	Non-homeless Special Needs HOPWA Strategy Homeless Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Prior to drafting the 2020 Annual Action Plan, MDHA held three 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.
21	**Agency/Group/Organization**	Continuum of Care
	Agency/Group/Organization Type	Services - Homeless
	What section of the Plan was addressed by Consultation?	Non-homeless Special Needs Homeless Needs – Chronically homeless Homeless Needs – Families with children Homeless Needs – Veterans Homeless Needs – Unaccompanied youth Homeless Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Prior to drafting the 2020 Annual Action Plan, MDHA held three 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.
22	**Agency/Group/Organization**	Mid-Cumberland Human Resource Agency
	Agency/Group/Organization Type	Health Agency
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Non-homeless special needs

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Prior to drafting the 2020 Annual Action Plan, MDHA held three 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.
23	**Agency/Group/Organization**	Community Care Fellowship
	Agency/Group/Organization Type	Services - Homeless
	What section of the Plan was addressed by Consultation?	Non-homeless Special Needs Homeless Needs – Chronically homeless Homeless Needs – Families with children Homeless Needs – Veterans Homeless Needs – Unaccompanied youth Homeless Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Prior to drafting the 2020 Annual Action Plan, MDHA held three 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.

24	**Agency/Group/Organization**	Metro Social Services
	Agency/Group/Organization Type	Other Government - Local
	What section of the Plan was addressed by Consultation?	Non-homeless Special Needs Homeless Needs – Chronically homeless Homeless Needs – Families with children Homeless Needs – Veterans Homeless Needs – Unaccompanied youth Homeless Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Prior to drafting the 2020 Annual Action Plan, MDHA held three 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.
25	**Agency/Group/Organization**	NeedLink
	Agency/Group/Organization Type	Services-homeless
	What section of the Plan was addressed by Consultation?	Non-homeless Special Needs Homeless Needs – Chronically homeless Homeless Needs – Families with children Homeless Needs – Veterans Homeless Needs – Unaccompanied

		youth Homeless Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Prior to drafting the 2020 Annual Action Plan, MDHA held three 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.
26	**Agency/Group/Organization**	Members of Metro Council and/or Metro Government
	Agency/Group/Organization Type	Civic Leaders Other Government - Local
	What section of the Plan was addressed by Consultation?	Housing Needs Assessment Public Housing Needs Economic Development Homelessness Needs Non-housing Community Development Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Prior to drafting the 2020 Annual Action Plan, MDHA held three 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.
27	**Agency/Group/Organization**	Metro Homeless Impact Division
	Agency/Group/Organization Type	Services – Homeless
	What section of the Plan was addressed by Consultation?	Homeless Needs – Chronically homeless Homeless Needs – Families with children Homeless Needs – Veterans Homeless Needs – Unaccompanied youth Homeless Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Prior to drafting the 2020 Annual Action Plan, MDHA held three 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.
28	**Agency/Group/Organization**	Nashville Cares
	Agency/Group/Organization Type	Services – Persons with HIV/AIDS
	What section of the Plan was addressed by Consultation?	Non-homeless Special Needs HOPWA Strategy Homeless Needs – Chronically homeless Homeless Needs – Families with children

		Homeless Needs – Veterans Homeless Needs – Unaccompanied youth Homeless Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Prior to drafting the 2020 Annual Action Plan, MDHA held three 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.
29	**Agency/Group/Organization**	Project Return
	Agency/Group/Organization Type	Services – Homeless Other (Formerly Incarcerated)
	What section of the Plan was addressed by Consultation?	Housing Needs Assessment Homeless Needs – Chronically homeless Homeless Needs – Families with children Homeless Needs – Veterans Homeless Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Prior to drafting the 2020 Annual Action Plan, MDHA held three 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.
30	**Agency/Group/Organization**	Veterans Affairs Department
	Agency/Group/Organization Type	Services – Veterans Other government – Federal
	What section of the Plan was addressed by Consultation?	Homeless Needs – Chronically homeless Homeless Needs – Families with children Homeless Needs – Veterans Homeless Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Prior to drafting the 2020 Annual Action Plan, MDHA held three 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.

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.
2019 Community Needs Evaluation (March 2019)	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 (HID	The CoC seeks to improve coordination of resources to maximize housing and services for homeless persons. This Plan evaluates homeless needs and produces a homelessness strategic plan as well as provides for funding to assist homeless persons and families.
Metro Government Of Nashville And Davidson County Homelessness Planning Council (HPC) Strategic Community Plan (July, 2019 – June 2022)	CoC – HID and MDHA	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'.
NashvilleNext (Amended August 2017)	Metro Planning Department	NashvilleNext is the City's General Plan to guide growth through 2040. Proposed Consolidated Plan activities are consistent with NashvilleNext.
nMotion, Nashville MTA/RTA Strategic Plan (September 2016)	Metro Transit Authority	This Plan sets forth recommendations to address regional transportation issues as the region continues to grow. Recommendations were

		considered when developing strategies to address affordable housing along transit corridors.
PHA Five Year Plan (October 1, 2019 – September 30, 2024) & Annual Plan (October 1, 2019 – September 30, 2020)	MDHA	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.
The Housing Nashville Report (April 2017)	Mayor's Office of Housing	The Housing Nashville Report produced by the Mayor's Office of Housing provides benchmark data on housing and established priorities for funding, building, preserving, and retaining affordable housing options. The Consolidated Plan incorporates data and recommendations from this Report.
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.

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(l))

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

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

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

PR-15 Citizen Participation

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

Summarize citizen participation process and how it impacted goal-setting

Activities proposed during the 2020 Program Year continue to further the priorities of the 2018-2023 Consolidated Plan which were established after a lengthy planning and public participation process. The Citizen Participation Plan provides information on how citizens can become involved in the development, implementation and evaluation of housing and community development programs. The Citizen Participation Plan contained in Appendix A of the 2018-2023 Consolidated Plan is available at http://www.nashville-mdha.org/?p=1847. This PY 3 Action Plan proposes an amendment to the Citizen Participation Plan to clarify that the criteria for a substantial amendment is a fiscal change in any program/project that is increased or decreased by more than 25% of the total HUD allocation of CDBG, HOME, ESG and HOPWA of the effected program year. This proposed amendment is included as Appendix G to this PY 3 Action Plan.

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 2020 Action Plan, the public comment began on March 10, 2020 and concluded at 4:00 p.m. on April 10, 2020. During the public comment period, members of the public were invited to share their comments at a public hearing. Details regarding the public comment period and public hearing are provided in the Public Notice included in Appendix D.

The Public Notice was published in English and Spanish advertised in *The Tennessean, The Tribune,* and *El Crucero.* In addition, the Notice was posted in English and Spanish at MDHA administrative and public/affordable housing properties and on MDHA's website (www.nashville-mdha.org). The Notice was widely distributed via email to over 300 partners, government officials, nonprofit organizations, businesses, neighborhood groups, and citizens, whose email addresses have been provided to MDHA, and was sent to the Mayor's Office, and Members of the Metro Council. MDHA encouraged recipients to circulate the Notice among their networks. The public comment period and public hearing and reminders were publicized via MDHA's social media outlets. Notice was specifically provided to Conexión Américas, The Center for Independent Living of Middle Tennessee, Native American Indian Association of Tennessee, Nashville International Center for Empowerment, and Metro Council. The public hearing held on March 23, 2020 was broadcast multiple times on the local government access channel, Metro 3. In addition, the video of the public hearing was made available on Metro's YouTube Channel.

Reasonable Accommodation

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

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

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comment s received	Summary of comments not accepted and reasons	URL (If applicable)
1	Newspaper Ad (The Tennessean)	Non-targeted/broad Community	N/A	N/A	N/A	
2	Newspaper Ad (The Tribune)	Minorities	N/A	N/A	N/A	
3	Newspaper Ad (El Crucero)	Non-English Speaking (Spanish)	N/A	N/A	N/A	
4	Internet Outreach (MDHA Website)	Non-targeted/broad Community	N/A	N/A	N/A	www.nashville-mdha.org
5	Internet Outreach (Social Media)	Non-targeted/broad Community	N/A	N/A	N/A	
6	Other: Posting at Public Housing & Other MDHA Properties	Residents of Public and Assisted Housing	N/A	N/A	N/A	
7	Other: Public Hearing – March 23 , 2020	Non-targeted/broad Community	See Appendix E.	See Appendix E.	See Appendix E.	
8	Other: Email Distribution	Non-targeted/broad community	N/A	N/A	N/A	

9	Other: Targeted Email	Non-English speaking persons (Spanish); Immigrants; Native Americans; Minorities; Persons with Disabilities	N/A	N/A	N/A	
11	Other: Video of March 23 , 2020 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

HUD released the final PY 2020 Allocation Amounts on February 28, 2020. The allocation amounts listed in the table below are based on the 2020 allocations. CDBG Program Income (PI) is estimated based on the average amount of PI collected for the program. HOME PI reflects PI receipted as of February, 2020 with estimates based on average receipts thru May 31, 2020.

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	5,313,699	427,383	0	5,741,082	11,482,164	Amount based on 2020 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	2,591,602	316,877	0	2,908,479	5,816,958	Amount based on 2020 allocations.
HOPWA	public - federal	Permanent housing in facilities Permanent housing placement Short term or transitional housing facilities STRMU Supportive services	1,547,366	0	0	1,547,366	3,094,732	Amount based on 2020 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	449,229	0	0	449,229	898,458	Amount based on 2020 allocations.

Table 56 - Expected Resources – Priority Table

In addition to the Consolidated Plan formula grants, funding from other Federal programs and local funds will be used to address Consolidated Plan priorities: Continuum of Care (CoC) funds, Neighborhood Stabilization Program (NSP) I and II Program Income, and CDBG Disaster Recovery (CDBG-DR) Program Income. For the FY 2019 Tier 1 HUD award announcement, the Nashville-Davidson County CoC received over $3.69 million through the annual competition for homeless assistance programs to be undertaken by MDHA and nonprofit organizations. MDHA has approximately $560,000 in NSP PI on hand with an estimated $120,000 expected to be received annually during five-year period covered by this Consolidated Plan from rental income from two multifamily rental projects previously acquired and constructed under the NSP programs. MDHA

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

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

MDHA receives pass through funding from the Tennessee Housing Development Agency (THDA) for the U.S. Department of Energy Weatherization Assistance Program (WAP) and for the U.S. Department of Health and Human Services Low Income Home Energy Assistance Program (LIHEAP), which are used jointly to install weatherization measures for very low income households. At the time of draft publication, current allocation amounts are used as 2020 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 2019, the Mayor's budget included $9,800,000 for the Barnes Fund. Unfortunately due to budget constraints, only $5,800,845 was awarded. This amount of funding will complete 549 units. The 2020 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 100 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 publically 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. 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 11 Metro owned lots were awarded in the fall 2019 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	2020	2021	Affordable Housing Non-Housing Community Development	Countywide Housing Target Areas	Construct New Affordable Housing Address Housing Barriers	CDBG: $28,705 HOME: $2,617,631	Public service activities other than Low/Moderate Income Housing Benefit: 150 Persons Assisted Rental units constructed: 53 Household Housing Unit Homeowner Housing Added: 6 Household Housing Unit
2	Affordable Housing Preservation	2020	2021	Affordable Housing Public Housing Non-Housing Community Development	Countywide Napier-Sudekum CNI Planning Area Housing Target Areas, Preference	Retain Affordable Housing Stock Maintain Housing Stability	CDBG: $2,466,198	Homeowner Housing Rehabilitated: 17Household Housing Unit Rental Housing

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
					to projects damaged as a result of March 3, 2020 Tornado			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	2020	2021	Homeless Non-Homeless Special Needs	Countywide Metropolitan Statistical Area	Assist Homeless Persons & Persons with HIV/AIDS	CDBG: $172,232 HOPWA: $1,500,945 ESG: $415,537	Tenant-based rental assistance / Rapid Rehousing: 325 Households Assisted Homeless Person Overnight Shelter: 2000 Persons

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
								Assisted Homelessness Prevention: 75 Persons Assisted HIV/AIDS Housing Assistance: 68 Household Housing Unit Other: 2845 Other

4	Self-sufficiency Opportunities	2018	2023	Public Housing Non-Housing Community Development Economic Development	Countywide CDBG Target Areas Napier-Sudekum CNI Planning Area	Create Economic Opportunities for LMI Persons Support Youth Programs	CDBG: $740,181	Public service activities other than Low/Moderate Income Housing Benefit: 1320 Persons Assisted Businesses Assisted: 14 Other: 1 Other
5	Neighborhood Revitalization	2018	2023	Non-Housing Community Development	Napier-Sudekum CNI Planning Area CDBG Target Areas Preference for Neighborhood Revitalization will be given to projects/activities damaged as a result of the March 3, 2020 Tornado	Invest in Underserved Areas	CDBG: $1,185,549	Other: 4 Other
6	Administration and Planning	2018	2023	Affordable Housing Homeless Non-Homeless Special Needs Non-Housing Community	Countywide Metropolitan Statistical Area Napier-Sudekum CNI Planning Area CDBG Target Areas	Provide Oversight and Management of Grants	CDBG: $1,148,216 HOPWA: $46,421 HOME: $290,848	Other: 4 Other

				Development	Housing Target Areas		ESG: $33,692	

Table 57 – Goals Summary

Goal Descriptions

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

Projects

AP-35 Projects – 91.220(d)

Introduction

The following are proposed projects to be undertaken during the 2020 program year or utilizing 2020 allocations.

Projects

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

Table 58 - Project Information

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

Funding priorities for the 2020 Action Plan are the same as those in the 2018 – 2023 Consolidated Plan.

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

AP-38 Project Summary

Project Summary Information

1	**Project Name**	**CDBG Administration & Planning**
	Target Area	Countywide
	Goals Supported	Administration and Planning
	Needs Addressed	Provide Oversight and Management of Grants
	Funding	CDBG: $1,148,216.00 ($1,062,740.00 Grant + $85,476.00 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	5/31/2021
	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 Targeted Rehab (Napier-Sudekum CNI Planning Area)**
	Target Area	Napier-Sudekum CNI Planning Area
	Goals Supported	Affordable Housing Preservation
	Needs Addressed	Retain Affordable Housing Stock
	Funding	CDBG: $80,375.00 (74,392.00 Grant + $5,983.00 PI)
	Description	Multi-component rehabilitation of owner-occupied homes in the Napier-Sudekum CNI Planning Area.

	Target Date	9/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	3 owner/occupied units in the designated area.
	Location Description	Napier-Sudekum CNI Planning Area
	Planned Activities	Assistance will be provided in the form of forgivable loans for elderly (age 62+) homeowners. Assistance to other homeowners will be provided in the form of deferred (due on sale) loans. Repairs or improvements will be limited to items that address health and safety needs, such as heat/air, roof repair, plumbing, electrical, and accessibility. Priority will be given to homeowners whose properties were damaged by the March 3, 2020 Tornados and those whose incomes are at or below 50% AMI, persons with disabilities, and the elderly (age 62+). In addition to assistance with Rehab, Tornado victims may also be eligible for assistance to reconstruct their home within the same footprint if rehab is not feasible. This program will be administered directly by MDHA and/or contracted out. 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.
3	**Project Name**	**CDBG Homeowner Rehab**
	Target Area	Preference will be given to homeowners whose properties were damaged by the March 3, 2020 Tornado and Housing Target Areas but assistance may be provided 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: $659,593.00 ($610,491.00 Grant + $49,102.00 PI)
	Description	Multi-component rehabilitation of homes occupied by LMI families, targeted to homes damaged by the March 3, 2020 Tornado and located within Housing Target Areas.
	Target Date	6/30/2022

	Estimate the number and type of families that will benefit from the proposed activities	38 units owned and occupied by persons with incomes at or below 80% AMI
	Location Description	Countywide for properties damaged in the March 3, 2020 Tornado and 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	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. Priority will be given to homeowners whose properties were damaged by the March 3, 2020 Tornados and those whose incomes are at or below 50% AMI, persons with disabilities, and the elderly (age 62+). In addition to assistance with Rehab, Tornado victims may also be eligible for assistance to reconstruct their home within the same footprint if rehab is not feasible. This program will be administered directly by MDHA and/or via a contracted partner. 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.
4	**Project Name**	**CDBG Weatherization Assistance**
	Target Area	Countywide (with preference given to properties damaged by the March 3, 2020 Tornado and/or households in accordance with WAP program guidelines, as applicable)
	Goals Supported	Affordable Housing Preservation
	Needs Addressed	Retain Affordable Housing Stock
	Funding	CDBG: $172,232.00 ($159,411.00 Grant + $12,821.00 PI)

	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	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	15 units owned and occupied by households with incomes at or below 80% AMI.
	Location Description	Countywide (with preference given to properties damaged by the March 3, 2020 Tornado and/or households in accordance with WAP program guidelines, as applicable)
	Planned Activities	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. Assistance will be treated as a grant to eligible homeowners. Priority will be given to properties damaged by the March 3, 2020 Tornado and/or households in accordance with WAP program guidelines, as applicable. This program will be administered by MDHA and/or via contracted partners. Homeowners must apply through the DOE Weatherization Assistance Program and/or be referred via other CDBG rehabilitation programs.
5	**Project Name**	**CDBG Roof Replacement**
	Target Area	Countywide (with preference given to properties damaged by the March 3, 2020 Tornado)
	Goals Supported	Affordable Housing Preservation
	Needs Addressed	Retain Affordable Housing Stock
	Funding	CDBG: $344,465.00 ($318,822.00 Grant + $25,643.00 PI)

	Description	Repair and/or replacement of roofs and components integral to roof replacement and preservation, including but not limited to, fascia/soffit, gutters/downspouts, tree/limb removal, etc. in homes owned and occupied by LMI households.
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	30 units owned and occupied by LMI households (≤ 80% AMI).
	Location Description	Countywide (with preference given to properties damaged by the March 3, 2020 Tornado)
	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.
6	**Project Name**	**CDBG Accessibility Rehabilitation**
	Target Area	Countywide (with preference given to properties damaged by the March 3, 2020 Tornado)
	Goals Supported	Affordable Housing Preservation
	Needs Addressed	Retain Affordable Housing Stock
	Funding	CDBG: $227,464.00 ($212,548.00 Grant + $14,916.00 PI)
	Description	Installation of accessibility improvements for handicapped or disabled households in homes owned and occupied by LMI households.
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	40 units owned and occupied by LMI households (≤ 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.
7	**Project Name**	**CDBG HVAC Replacement**
	Target Area	Countywide (with preference given to properties damaged by the March 3, 2020 Tornado)
	Goals Supported	Affordable Housing Preservation
	Needs Addressed	Retain Affordable Housing Stock
	Funding	CDBG: $344,465.00 ($318,422.00 Grant + $25,643.00 PI)
	Description	Installation of new HVAC systems or replacement of nonfunctioning HVAC units in homes owned and occupied by LMI households who are not receiving assistance through the CDBG Weatherization Program.
	Target Date	9/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	45 units owned and occupied by LMI households (≤ 80% AMI) who are not receiving assistance through the CDBG Weatherization.
	Location Description	Countywide (with preference given to properties damaged by the March 3, 2020 Tornado)
	Planned Activities	Installation of new HVAC systems or replacement of nonfunctioning HVAC units. Assistance will be treated as a grant to eligible homeowners. Homeowners may apply during the open application period or be referred to the program through the Regular CDBG Homeowner Rehab or Weatherization and/or Home Uplift Programs. Funds will be allocated on a first-come, first-serve basis to eligible households until funding is exhausted. This program will be administered by MDHA and/or via contracted partners.

8	**Project Name**	**CDBG Rental Rehab**
	Target Area	(Preference given to properties damaged by the March 3, 2020 Tornado) and 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: $00.00 (Funded in PY2018; underway in PY 2019 and continued in PY 2020)
	Description	Rehab of existing units to be occupied by LMI (≤ 80% AMI) families.
	Target Date	9/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	6 LMI households (≤ 80% AMI) – prior year funds
	Location Description	Preference given to properties damaged by the March 3, 2020 Tornado and Metro Council Districts experiencing loss or are at-risk of losing affordable housing – assistance may be provide Countywide if there is not sufficient interest in these areas.

	Planned Activities	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. 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. 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. 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.
9	**Project Name**	**CDBG Housing Delivery Costs**
	Target Area	Countywide
	Goals Supported	Affordable Housing Preservation
	Needs Addressed	Retain Affordable Housing Stock
	Funding	CDBG: $516,697.00 ($478,233.00 Grant + $38,464.00 PI)
	Description	Activity delivery costs associated with carrying out CDBG-eligible housing activities.
	Target Date	9/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	N/A. Accomplishments are tied to specific CDBG housing activities.
	Location Description	Countywide Napier-Sudekum CNI Planning Area Housing Target Areas – Areas where properties were damaged by the March 3, 2020 Tornado

	Planned Activities	Activity delivery costs incurred by MDHA or its contractors that are associated with the execution of the all CDBG Rehab (Homeowner and Rental) and Weatherization programs, such as reviewing and approving applications, making home inspections, preparing work-write ups, and inspecting projects through completion.
10	**Project Name**	**CDBG Housing Services**
	Target Area	Countywide
	Goals Supported	Affordable Housing Preservation
	Needs Addressed	Retain Affordable Housing Stock
	Funding	CDBG: $57,411.00 ($53,137.00 Grant + $4,274.00 PI)
	Description	Activity delivery costs in support of the HOME Program.
	Target Date	9/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	N/A. Accomplishments are tied to specific HOME housing activities.
	Location Description	Countywide Napier-Sudekum CNI Planning Area Housing Target Areas
	Planned Activities	Costs are also associated with housing activities that are linked to providing services to owners, tenants, contractors, and other eligible entities participating in or seeking to participate in the HOME program.
11	**Project Name**	**CDBG Summer Youth Programs**
	Target Area	Countywide
	Goals Supported	Self-sufficiency Opportunities
	Needs Addressed	Support Youth Programs
	Funding	CDBG: $325,003.00 ($300,809.00 Grant + $24,194.00 PI)
	Description	New or enhanced programs undertaken by nonprofit or public agencies that serve youth ages 6-18 from LMI families during the Summer of 2019.
	Target Date	7/31/2020
	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, 2020. Funding is awarded through a competitive process.
12	**Project Name**	**CDBG Youth Employment Programs**
	Target Area	Countywide
	Goals Supported	Self-sufficiency Opportunities
	Needs Addressed	Support Youth Programs
	Funding	CDBG: $105,521.00 ($97,666.00 Grant + $7,855.00 PI)
	Description	Summer employment opportunities for youth ages 14-16 from LMI families offered by nonprofit and public agencies participating in Metro's Opportunity NOW program during the Summer of 2020.
	Target Date	7/31/2020
	Estimate the number and type of families that will benefit from the proposed activities	110 youth ages 14-16 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 "Opportunity NOW" work program that focuses on the need for employment and job training opportunities for youth ages 14 – 16. Programs include one week of training and six weeks of paid, project-based community improvement work. Examples of project-based work programs include community gardens, community art projects, and neighborhood cleanup projects, etc. Programs may begin on or before June 1 and must conclude by July 31, 2020. Funding is awarded through a competitive process.
13	**Project Name**	**CDBG Housing Assistance for the Homeless**
	Target Area	Countywide

	Goals Supported	Support for Homeless Persons and Persons with HIV/AIDS
	Needs Addressed	Assist Homeless Persons & Persons with HIV/AIDS
	Funding	CDBG: $172,232.00 ($159,411.00 Grant + $12,821.00 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	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	150 persons
	Location Description	Countywide for homeless persons who need emergency assistance for housing placement in Davidson County.
	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.
14	**Project Name**	**CDBG Renter Counseling Services**
	Target Area	Housing Target Areas
	Goals Supported	Affordable Housing Preservation
	Needs Addressed	Maintain Housing Stability
	Funding	CDBG: $63,496.00 ($58,770.00 Grant + $4,727.00 PI))
	Description	Counseling services provided to tenants of MDHA-owned public/affordable housing on tenant responsibilities to help them maintain housing stability.
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	125 residents of MDHA-owned public/affordable housing.
	Location Description	MDHA-owned properties in Housing Target Areas

	Planned Activities	Counseling program designed to equip residents with tools to become responsible tenants and good neighbors and to help mitigate potential or actual problems that could result in housing loss. Program should have a specific plan, strategy, and intervention t that has been shown to positively address housing loss prevention. Funding is awarded through a competitive process.
15	**Project Name**	**CDBG Fair Housing Services**
	Target Area	Countywide, with emphasis on Housing Target Areas
	Goals Supported	New Affordable Housing Opportunities Affordable Housing Preservation
	Needs Addressed	Address Housing Barriers Maintain Housing Stability
	Funding	CDBG: $28,705.00 ($26,568.00 Grant + $2,137.00 PI)
	Description	Fair housing counseling, outreach, and education; conduct complaint-based testing.
	Target Date	9/30/2021
	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	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. Funding was awarded to a qualified nonprofit through a competitive process in PY 2018. PY 2020 funding will extend the 2018 award agreement.
16	**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: $52,244.00 ($48,355.00 Grant + $3,889.00 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	9/30/2021
	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. The program started in PY 2018 and is being administered by MDHA; 2020 PY funds will fund the 3rd year of the program.
17	**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: $57,411.00 ($53,137.00 Grant + $4,274.00)
	Description	Delivery costs associated with CDBG public services activities
	Target Date	05/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	Accomplishments will be tied to specific Public Services Activities.
	Location Description	Countywide
	Planned Activities	Costs directly related to carrying out specific Public Services activities.
18	**Project Name**	**CDBG Microenterprise Assistance**
	Target Area	CDBG Target Areas
	Goals Supported	Self-sufficiency Opportunities
	Needs Addressed	Create Economic Opportunities for LMI Persons
	Funding	CDBG: $200,002.00 ($185,113.00 Grant + $14,889.00 PI))
	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	9/30/2021

	Estimate the number and type of families that will benefit from the proposed activities	14 businesses
	Location Description	Preference for businesses located in or will be located in CDBG Target Areas, with opportunities for businesses Countywide
	Planned Activities	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. Program will be administered through a contracted partner.
19	**Project Name**	**CDBG Public Facilities and Improvements**
	Target Area	CDBG Target Areas (Preference given to projects damaged by the March 3, 2020 Tornado) Napier-Sudekum CNI Planning Area
	Goals Supported	Neighborhood Revitalization
	Needs Addressed	Invest in Underserved Areas
	Funding	CDBG: $1,148,216.00 ($1,062,740.00 Grant + $85,477.00 PI)
	Description	Construction or expansion of a neighborhood facility owned by a nonprofit or public agency or installation of infrastructure improvements (such as sidewalks or bus stops) in CDBG Target or Napier-Sudekum CNI Planning Areas (Preference given to projects damaged by the March 3, 2020 Tornado)

	Target Date	9/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	3 projects
	Location Description	Projects will be located in and serve residents in either CDBG Target or Napier-Sudekum CNI Planning Areas (Preference given to projects within these areas damaged by the March 3, 2020 Tornado that meet the criteria for eligible projects/activities)
	Planned Activities	Costs include hard and soft costs, A&E costs. Maintenance/operations costs are not eligible. Projects will be identified through collaboration with Metro. Funds for public facilities may be used for Metro or MDHA-owned projects or awarded to qualified nonprofits.
20	**Project Name**	**CDBG Public Facility Program Delivery**
	Target Area	CDBG Target Areas Napier-Sudekum CNI Planning Area
	Goals Supported	Neighborhood Revitalization
	Needs Addressed	Invest in Underserved Areas
	Funding	CDBG: $37,333.00 ($34,553.00 Grant + $2,780 PI)
	Description	Delivery costs associated with CDBG public facility/infrastructure projects.
	Target Date	9/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	Accomplishments will be tied to specific public facility/infrastructure activities.
	Location Description	Projects will be located in and serve residents in either CDBG Target or Napier-Sudekum CNI Planning Areas
	Planned Activities	Costs directly related to carrying out specific public facility/infrastructure activities.
21	**Project Name**	**HOME Administration**
	Target Area	Countywide
	Goals Supported	New Affordable Housing Opportunities
	Needs Addressed	Construct New Affordable Housing
	Funding	HOME: $290,848.00 ($259,160 Grant + $31,688.00 PI)

	Description	Provide grant management, compliance, and oversight of Home-funded activities.
	Target Date	5/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	Countywide
	Planned Activities	Administrative costs include staff and related costs for overall program management, coordination, monitoring, reporting, and evaluation. Administrative activities will be undertaken by MDHA.
22	**Project Name**	**HOME New Construction – Rental**
	Target Area	Countywide, with a preference for Housing Target Areas
	Goals Supported	New Affordable Housing Opportunities
	Needs Addressed	Construct New Affordable Housing
	Funding	HOME: $2,035,935.00 ($1,814,121.00 Grant + $221,814.00 PI)
	Description	Funding for construction of new units for rent to households with incomes ≤ 60% AMI.
	Target Date	5/31/2023
	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	A minimum of 15% of the 2020 HOME allocation, estimated to be $388,740, 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. Additionally, MDHA may set aside a minimum of $500,000 for the redevelopment of MDHA-owned properties

		converted under RAD. 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. Financial assistance to developers may be in the form predevelopment loans, construction loans, and permanent financing. Eligible uses of funds include acquisition, site preparation, construction, and soft costs. All new construction projects will be subject to underwriting by MDHA and must meet HOME Site and Neighborhood Standards. 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. Projects that would require the permanent displacement of existing residents will not be eligible for funding.

23	Project Name	HOME New Construction – Ownership
	Target Area	Countywide, with a preference for Housing Target Areas
	Goals Supported	New Affordable Housing Opportunities
	Needs Addressed	Construct New Affordable Housing
	Funding	HOME: $290,848.00 ($259,160.00 Grant + $31,688.00 PI)
	Description	New construction for ownership and downpayment assistance in conjunction with the purchase of these homes by LMI households (≤80% AMI).
	Target Date	5/31/2023
	Estimate the number and type of families that will benefit from the proposed activities	6 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	A minimum of 15% of the 2020 HOME allocation, estimated to be $388,740 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. 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. 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. Projects that would require the permanent displacement of existing residents will not be eligible for funding.

24	Project Name	HOME New Nonprofit Partner Set-Aside
	Target Area	Countywide, with a preference for Housing Target Areas
	Goals Supported	New Affordable Housing Opportunities
	Needs Addressed	Construct New Affordable Housing
	Funding	HOME: $290,848.00 ($259,160.00 Grant + $31,688.00 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	6/30/2021
	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 there are no eligible projects proposed in Housing Target Areas.
	Planned Activities	For 2020, 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. Eligible applicants must have a shovel ready project and demonstrate their ability to develop successful affordable housing projects. **Eligible activities for consideration include:** • 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. 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.

		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). 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. 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. Projects that would require the permanent displacement of existing residents will not be eligible for funding.
25	**Project Name**	**HOPWA Housing and Supportive Services**
	Target Area	Metropolitan Statistical Area
	Goals Supported	Support for Homeless & Persons with HIV/AIDS
	Needs Addressed	Assist Homeless Persons & Persons with HIV/AIDS
	Funding	HOPWA: $1,547,366.00
	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	5/31/2023
	Estimate the number and type of families that will benefit from the proposed activities	-Facility Based Rental Assistance: 53 persons -STRMU: 275 persons -Supportive Services: 2,320 persons -Short-Term/Emergency Assistance – 15 persons
	Location Description	Persons with HIV/AIDS in the Nashville-Davidson—Murfreesboro-Franklin-MSA
	Planned Activities	• $154,737.00 for Administration – $46,421.00 retained by MDHA and $108,316.00 to be awarded to Sponsor agencies • $1,392,629.00 for the following eligible activities:

		o Facility Based Rental/Housing Assistance– 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) o STRMU – reasonable rent and mortgage assistance payments that represent actual housing costs; assistance varies per client depending on funds available, tenant need, and program guidelines o Tenant Based Rental Assistance – costs associated with the placement of clients in permanent housing in the private rental housing market; assistance covers a portion of the rent based upon Fair Market Rent or "reasonable rent" and operates similar to the Section 8 Housing Choice Voucher Program. o Supportive Services - 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. All funds will be awarded to Sponsors selected for funding through an RFA to be issued in Spring 2020. 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.

26	Project Name	ESG Programs and Services
	Target Area	Countywide
	Goals Supported	Support for Homeless Persons & Persons with HIV/AIDS
	Needs Addressed	Assist Homeless Persons & Persons with HIV/AIDS
	Funding	ESG: $449,229.00
	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	5/31/2022
	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	• $33,692.00 for Administration – retained by MDHA for general management, oversight, and coordination of ESG programs • $4,492.00 for HMIS – retained by MDHA for costs associated with providing technical assistance and training, data review, input, and quality control for ESG subrecipients • $411,045.00 for the following eligible activities: o Rapid Re-housing Assistance – 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) o Homeless Prevention 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 o Shelter Operations* - 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) o Essential Services* – 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) o Street Outreach* – includes, but is not limited to, the cost of engagement, case management, emergency health and mental health, etc. and other eligible actives as defined in the ESG regulation at 24 CFR, §576-101 *The total amount awarded for Shelter Operations, Essential Services, and Street Outreach cannot exceed $269,537.00 (60% of the 2020 ESG Allocation). Funding for all activities, except Administration and HMIS, will be awarded to qualified nonprofits through a competitive process to be announced Spring 2020. 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.

AP-50 Geographic Distribution – 91.220(f)

On March 3, 2020, Metro Nashville-Davidson Counts was impacted by an EF-3 tornado. Based on initial assessments conducted by Metro Codes Department, 771 homes and businesses were destroyed by the tornado. Another 1,194 properties sustained more minor damages. Thus preference for assistance in home rehabilitation and public facility projects will be given to residents within tornado damaged areas that meet the criteria for eligible projects/activities.

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

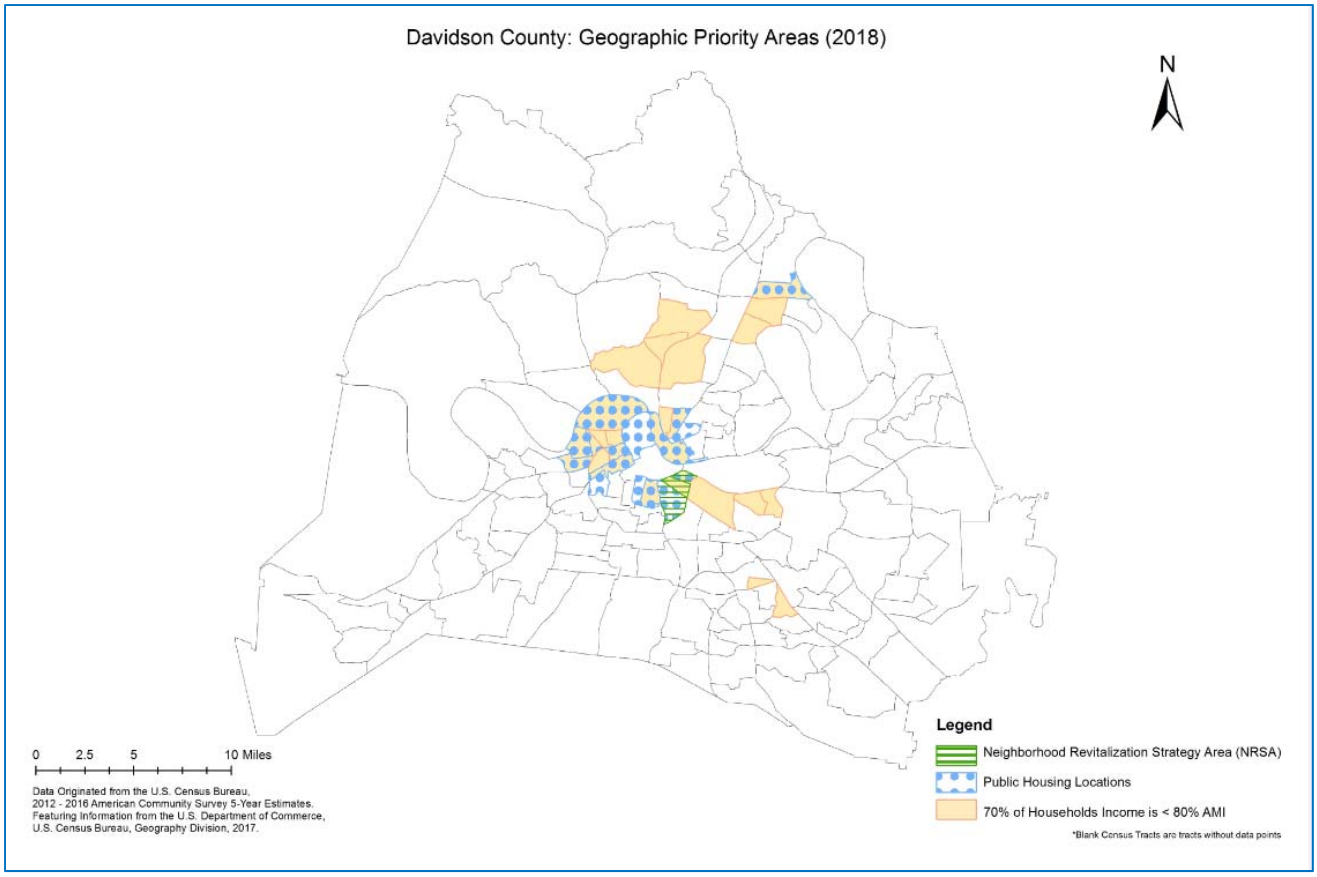
MDHA has established certain funds/activities in three designated areas in Davidson County: 1) CDBG Target Areas, 2) Napier-Sudekum Choice Neighborhoods Initiative (CNI) Planning Area, and 3) Housing Target Areas, as described below. For 2020, funding will be prioritized as follows. Remaining CDBG, ESG, and HOPWA funds will be deployed countywide, while HOPWA funds are used to assist persons with HIV/AIDS throughout the MSA.

Geographic Distribution

Target Area	Percentage of Funds
CDBG Target Areas	13%
Napier-Sudekum CNI Planning Area	12%
Housing Target Areas	32

Table 59 - Geographic Distribution

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


Davidson County: Geographic Priority Areas (2018)
N
0 2.5 5 10 Miles
Data Originated from the U.S. Census Bureau,
2012 - 2016 American Community Survey 5-Year Estimates.
Featuring Information from the U.S. Department of Commerce,
U.S. Census Bureau, Geography Division, 2017.
Legend
Neighborhood Revitalization Strategy Area (NRSA)
Public Housing Locations
70% of Households Income is < 80% AMI
*Blank Census Tracts are tracts without data points

Geographic Priority Areas

Metro Nashville-Davidson County was hit by Tornados on March 3, 2020. Thus preference for assistance in rehabilitation and public facility projects will be given to residents residing in tornado 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	

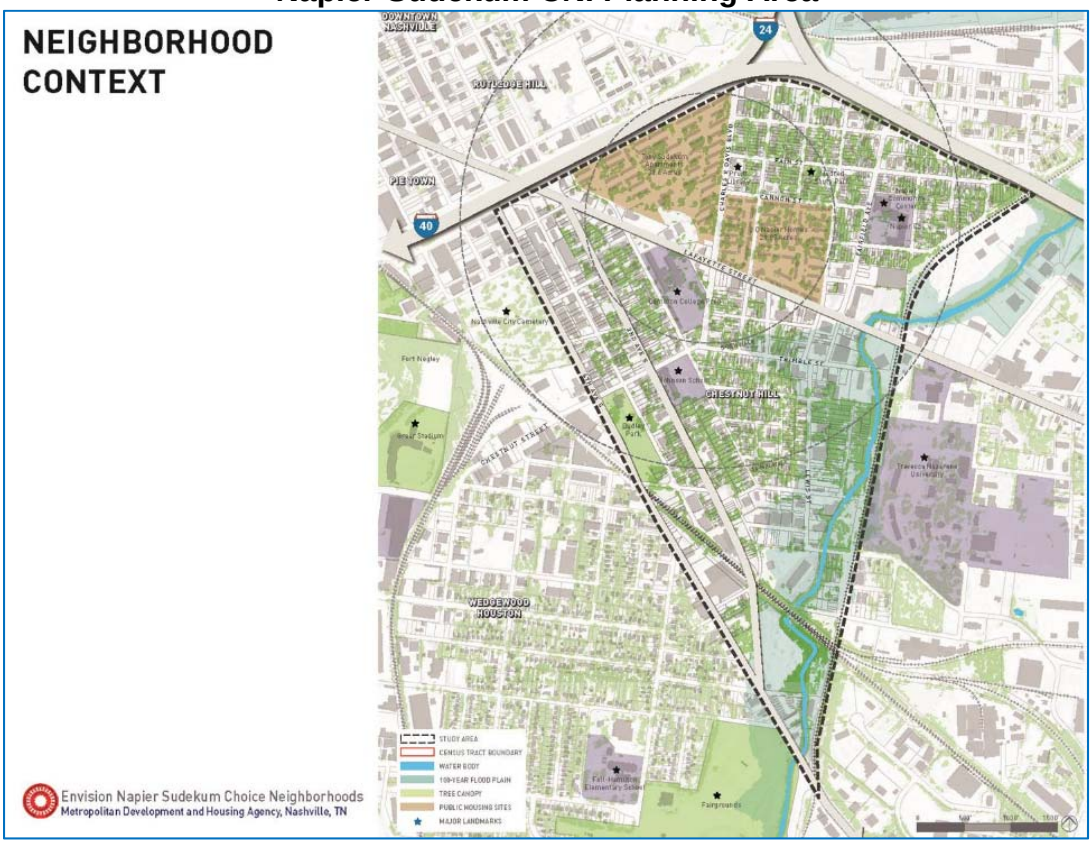
2		
	Area Name:	**Napier-Sudekum CNI Planning Area**
	Area Type:	Local Target area
	HUD Approval Date:	NRSA Application approved with the Consolidated Plan.
	% of Low/ Mod:	The targeted area's low to mod-income population includes over 70% of residents with income less than 80% AMI (72.24%).
	Revital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

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

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

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

Napier-Sudekum CNI Planning Area



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

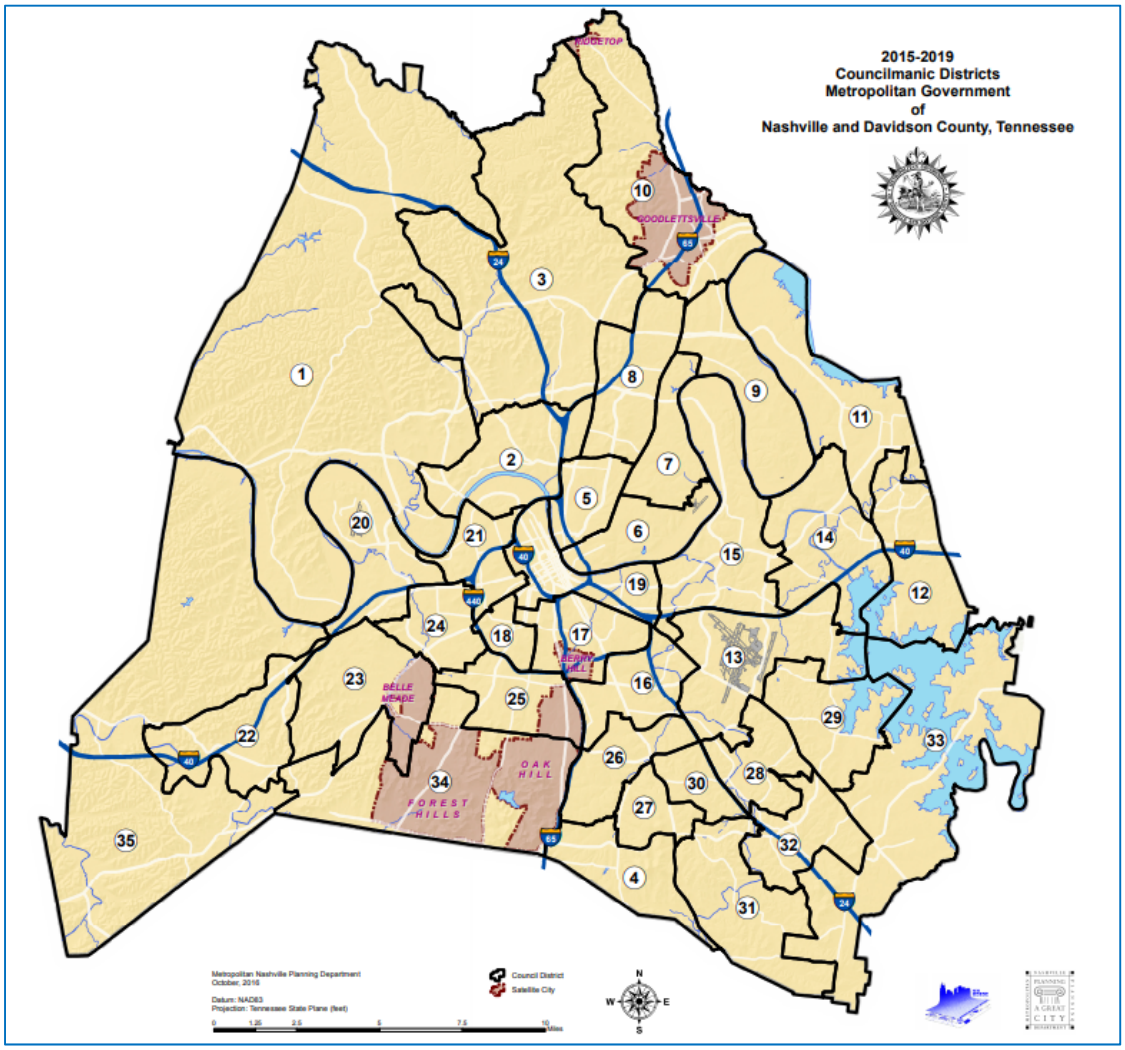
	22 MDHA-owned properties house over 5,000 units occupied by low-income households; seven of these are older, distressed properties in which MDHA plans to redevelop into mixed-income, mixed-use communities.
How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	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 *Housing Nashville Report.* Analyses and input also revealed the need for reducing concentrations of poverty as MDHA proposes for its sites.
Identify the needs in this target area.	Preserve existing affordable housing in gentrifying areas and create new affordable units.
What are the opportunities for improvement in this target area?	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. 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.
Are there barriers to improvement in this target area?	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.

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%

On March 3, 2020, Metro Nashville-Davidson Counts was impacted by an EF-3 tornado. Based on initial assessments conducted by Metro Codes Department, 771 homes and businesses were destroyed by the tornado. Another 1,194 properties sustained more minor damages. Thus preference for assistance in home rehabilitation and public facility projects will be given to residents within tornado damaged areas that meet the criteria for eligible projects/activities.

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:

- March 3, 2020 Tornado victims
- Large families
- Persons with disabilities
- Elderly (age 62+)
- Very low-income households (≤50% AMI).

Housing for Persons with AIDS

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

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

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

One Year Goals for the Number of Households to be Supported	
Homeless (ESG - CDBG)	550
Non-Homeless (CDBG & HOME)	230
Special-Needs (HOPWA)	343
Total	1123

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

One Year Goals for the Number of Households Supported Through	
Rental Assistance (ESG & HOPWA)	893
The Production of New Units (HOME)	59
Rehab of Existing Units (CDBG)	171
Acquisition of Existing Units	0
Total	1123

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

AP-60 Public Housing – 91.220(h)

Introduction

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

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

As discussed in the Consolidated Plan, MDHA established a Neighborhood Revitalization Strategy Area (NRSA) at Napier-Sudekum. The boundary of the NRSA overlaps with the Choice Neighborhoods Planning area. The first proposed project for the NRSA was rehab for homeowners in the NRSA and this will continue in PY 2020. Additional projects include the following:

- Broadband infrastructure projects dedicated to expanding broadband access in the Napier Place and Sudekum Apartments neighborhood through installation of a community WI-FI network that serves communal and open spaces at the neighborhood's core. This project will continue in two (2) neighborhood playground and picnic areas and community rooms adjacent to each property's management office. Located in Census Tract 148, Davidson County, TN. The continued targeted achievements for this project are to be out for bid in PY 2020.

- A street lighting project designed to increase community safety in the Napier Place and Sudekum Apartments neighborhood by using Crime Prevention Through Environmental Design (CPTED) principles to improve street lighting conditions and efficacy. Improved and increased street lighting is known to have a positive impact in the reduction of criminal activity and increases perceptions of community safety. Located in Census Tract 148, Davidson County, TN. The targeted achievement for this project is to have the planning phase underway by the end of PY 2020.

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 ≤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 be used to provide renter counseling services.

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

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

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

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

Not applicable.

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

Introduction

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

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

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

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 serve as a way 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 strategies outlined within the plan are action-oriented, time-based and outcome-driven. Therefore, it focuses on the top priorities for the Homelessness Planning Council to implement and measure 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. 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

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

- Begin 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.
- Improve coordination efforts among service providers through increased investment in HMIS.
- Invest in activities that lead people experiencing homelessness to permanent housing as quickly as possible while offering a variety of interventions to address persons' unique needs.
- Use ESG funds to assist approximately 325 people with rapid rehousing and 75 with homeless prevention services; serve approximately 2,000 individuals via shelters and essential services; and touch approximately 100 individuals via street outreach.
- Use CDBG funds to assist approximately 150 homeless individuals with one-time, emergency payments to pay for first month's rent, security and utility deposits for housing obtained via HID or utilizing MDHA Shelter Plus Care or VASH voucher programs.
- Work to assess and improve the community's system for addressing homelessness and building a housing crisis resolution system.
- Work to broaden the implementation of a Coordinated Entry (CE) for the homeless and those at risk of homelessness.
- Continue to provide homelessness prevention and diversion services to those who are still housed.
- Continue to prioritize ESG prevention funds to assist persons with histories of homelessness.

- Continue to increase system capacity in outreach and housing navigation services.
- Work to increase permanent housing opportunities, linked to appropriate supports, for homeless veterans, chronic/vulnerable homeless persons, families and youth.
- Expand rapid rehousing opportunities for homeless youth & young adults (YYA), as well as create diversion options to avoid homelessness for this subpopulation.
- Work on the development of a new CE specifically for victims of domestic violence, as well as new 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.
- Continue marketing efforts to ensure different populations know where the main entry points to services are.
- Continue the work to adopt minimum standards for street outreach and improve the coordination between different street outreach groups.
- Continue to educate service providers so they know how to link and partner with trained housing navigators.
- Continue to expand efforts to connect people who 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.
- Explore the development of a Homeless Court in Nashville.

Addressing the emergency shelter and transitional housing needs of homeless persons

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

The following strategies will help address these needs:

- Develop a solid prevention and diversion effort;
- Quickly link people to emergency beds;
- Coordinate exit strategies that allow newly identified low-income affordable housing units to be filled with people who experience literal homelessness;
- Create an in-reach team to assist shelter providers with housing navigation and enter people into CE;
- Improve data sharing to know how long people stay in shelter beds and where they go when leaving emergency shelters;
- Educate providers across the CoC on eligibility requirements for different transitional housing to promote appropriate referrals (ideally through 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.
- 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.
- Partner with Step Up as they enhance services & housing placement in Nashville by adding 24-hour care coordination, psych support and medication management for chronic homeless persons.
- Enhance community understanding of Housing First via training led by Sam Tsemberis.
- Work with public agencies, private and nonprofit developers to explore opportunities to build affordable housing and permanent supportive housing units.
- Develop a plan and advocate for landlord incentive programs such as a mitigation fund, move-in cost assistance similar to the Veterans incentive program implemented by a partnership between the Mayor's Office and MDHA.
- Support the continued partnership between MDHA and the Metropolitan Homeless Impact Division that dedicates up to 18 housing choice vouchers per month to households experiencing literal homelessness.
- Strengthen the ongoing landlord outreach process by improved coordination between the city and service providers who search for housing opportunities for their clients.
- Develop solid By Name Lists for families, Veterans, YYA, and individuals experiencing literal homelessness with a preference for housing given to people experiencing long-term (with a focus on ending and preventing chronic) homelessness.
- Continue the Community Mental Health Systems Improvement (CMHSI) efforts to bring together partners from the health, mental health, criminal justice and homeless systems to improve coordination for the most vulnerable populations and link them with stable housing by ensuring they are aware of available local, state and government homeless funding sources to support the housing needs of this population.

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

or private agencies that address housing, health, social services, employment, education, or youth needs

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

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

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

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

Introduction:

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

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

Barrier	Proposed Action
Availability and cost of land	• 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	• 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	• Provide density bonuses for affordable housing.
Property taxes	• 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	• Leverage public funds to create more

	units. • Continue to fund the Barnes Fund. • Explore public/private partnerships.
Prohibition on local hire requirements	• Increase Section 3 participation in HUD-funded construction projects through outreach and job training programs.
Negative perception (NIMBYism)	• Develop a public awareness campaign to combat NIMBYism.
Housing discrimination	• Educate residents as well as the industry on fair housing rights and responsibilities.
Criminal history	• 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.	• 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.
- Continue to provide and expand broadband access infrastructure for low income residents in the NRSA target areas.

Actions planned to foster and maintain affordable housing

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

Actions planned to reduce lead-based paint hazards

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

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

Actions planned to reduce the number of poverty-level families

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

Actions planned to develop institutional structure

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

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

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

Program Specific Requirements

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

Introduction:

In accordance with federal regulations, this Action Plan describes the CDBG, HOME, and ESG activities proposed to be undertaken with 2020 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(l)(1)

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

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

Other CDBG Requirements

1. The amount of urgent need activities	0

HOME Investment Partnership Program (HOME)
Reference 24 CFR 91.220(l)(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 March 3, 2020 , HUD issued 2020 homeownership value limits (effective April 1, 2020) 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 $319,153 for single family existing construction and $389,764 for single family new construction. These are the value limits MDHA will utilize to ensure homes acquired with HOME funds comply with modest housing requirement of 24 CFR 92.254. All Homes must be sold to households with incomes at or below 80% AMI.

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

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

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

   N/A

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

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

Nashville's ad hoc CoC Written Standards Committee (member agencies listed below) began meeting in late January 2019 to revise a January 2018 draft document to guide the provision of housing and services funded via both HUD CoC and ESG 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 internet for comment at http://www.nashville-mdha.org/community-development/about-the-continuum-of-care. The Written Standards were approved by the Homelessness Planning Council on September 23, 2019, and may be found on MDHA's website at http://www.nashville-mdha.org/wp-content/uploads/2016/07/COC-ESG-Written-Standards-FINAL-1.pdf.

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

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

- Nashville CARES
- The Next Door
- Safe Haven Family Shelter
- The United Way of Metro Nashville

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 (HID) 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 25 agencies that participate actively in CE.

The 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 tool 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 bi-weekly care coordination meetings also factored in.

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

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

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

FY2018 CoC funding awards promise to strengthen the city's 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.

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 2019, members of the CoC Performance Evaluation Committee (PEC) also served on the ESG evaluation committee. Discussions are underway to potentially merge the PEC and ESG review committees to allow them to review both programs to facilitate increased coordination between the funding sources.

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

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

5. Describe performance standards for evaluating ESG.

   The CoC Written Standards of Care Committee began meeting in January 2019 to revise a January 2018 draft document to guide the provision of housing and services funded via HUD CoC and ESG. A final draft was emailed to a CoC listserv of over 480 stakeholders, including agencies awarded CoC and ESG funding to get their input. The final document was presented to the CoC membership and the Homelessness Planning Council, which adopted the standards in September 2019. 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 document as currently drafted 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 via ESG funds, as well as how stays in shelter are becoming shorter and recidivism is declining.

METROPOLITAN NASHVILLE-DAVIDSON COUNTY, TENNESSEE

APPENDICES

SUBSTANTIAL AMENDMENT 2
TO THE
2018 – 2023 CONSOLIDATED PLAN
FOR
HOUSING AND COMMUNITY DEVELOPMENT
AND
THE 2020-2021 ANNUAL UPDATE
FOR

PROGRAM YEAR THREE

For the period June 1, 2020 – May 31, 2021

Prepared by:

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

On Behalf of:

The Metropolitan Government of
Nashville and Davidson County

Updated April 13, 2020

Substantial Amendment 2 to the 2018-2023 Consolidated Plan

For

Housing and Community Development

And

The 2020-2021 Annual Update

(2020 Action Plan) Program Year Three

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 – Citizen Participation Plan

APPENDIX A

HOME RESALE/RECAPTURE PROVISIONS

I. BACKGROUND

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

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

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

II. DEFINITIONS

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

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

- Net Proceeds – the sales price minus superior loan repayment (other than HOME funds) and any closing costs.

III. PERIOD OF AFFORDABILITY

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

a. Period of Affordability Under Resale Provisions

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

b. Period of Affordability Under Recapture Provisions

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

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

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

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

IV. RESALE PROVISIONS

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

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

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

a. Applicability

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

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

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

b. Effect

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

c. Fair Return on Investment

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

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

Calculating Fair Return on Investment - EXAMPLE

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

For the purposes of using the Federal Housing Finance Agency's Housing Price Index (HPI) calculator, the home was purchased in the 3rd Quarter of 2014, and will be calculated using the most current quarter available, 4th Quarter of 2019. Using the HPI calculator, the house would be worth approximately $190,246.

Calculating the Fair Return to the Original Owner:

Downpayment:	$1,000	
Capital Improvements	$1,500	
Increase in value per HPI:	$62,746	
	$65,246	Fair Return on Investment

In order to realize a fair return to the original homeowner, the sales price must be set at roughly $190,246 (i.e., $125,000 + $1,000 down payment + $1,500 capital improvements + $62,746 HPI increase = $190,246).

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

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

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

d. Continued Affordability

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

e. Imposing Resale Provisions

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

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

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

f. Foreclosure

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

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

V. RECAPTURE PROVISIONS

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

a. Applicability

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

b. Effect

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

c. Imposing Recapture Provisions

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

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

d. Foreclosure

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

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

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

VI. REFINANCING POLICY

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

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

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

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

MONITORING RESALE & RECAPTURE PROVISIONS

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

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

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

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

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

VII. APPROVAL OF CHDO & SUBRECIPIENT PROVISIONS

CHDOs and Subrecipients carrying out development and/or homebuyer activities on behalf of 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 2018 and 2019) for a 3-month period November 2019 – January 2020

Month	Unit Type	Sales Volume	Median Price Based on 95%
November 2019	Single Family - New Construction	162	$403,750.00
December 2019	Single Family- New Construction	185	$418,000.00
January 2020	Single Family – New Construction	171	$347,542.00
	Average Volume & Median Sales Price for Months reviewed	518	**$389,764.00**

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 **$389,764.00**.

HUD New Home Construction Single Family Limit effective April 1, 2020 - $279,900 – 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 Decembr 2019

Month	Unit Type	Sales Volume	Median Price Based on 95%
December 2019	Single Family – Existing	859	**$319,153.00**

Sales Volume for December 2019 exceeds the required 500 volume of sales per month,

therefore December 2019 sales data was utilized to establish a median sales price per HUD guidelines based on local data of **$319,153.**

HUD Existing Home Single Family Limit effective April 1, 2020 - $270,000 – median prices listed for December 2019 exceeds this limit.

Average Median Sales price for New Construction and Existing Construction is $354,459

**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

Session 1: Action Plan Consultation: Homelessness & Housing for Persons with HIV/AIDS Held on November 14, 2019

Question 1: Prioritize activities to address homelessness.

21 persons (exclusive of MDHA staff) attended representing homeless advocates, Metro Social Services, VA, CoC Planning Council, various nonprofits that serve the homeless population (ESG and non-ESG grantees), and HOPWA project sponsors.

Analysis: There were four categories that the attendees were asked to prioritize with regard to activities that would address homelessness; outreach, emergency shelter and transitional housing, rapid rehousing, and prevention. Based on the totality of the responses and through discussion, the work areas above were ranked in the following order:

1. Prevention - received the most responses as being the number one priority.
2. Outreach - received the most responses as being the second priority.
3. Emergency Shelter and Transitional Housing - received the most responses as being the third priority.
4. Rapid Re-Housing - received the most responses as being the fourth priority.

1. Prevention

1-IIIIII (6)
2-IIII (4)
3-
4-

Comments:

1. Needs to be comprehensive.
2. Affordable housing.
3. It is cheaper and easier to keep people in current housing than the cost/difficulty to provide case management, wrap around services, shelter/transitional housing, etc. to get folks back into permanent housing.
4. Increase of those at risk.
5. Don't add to the problem.

2. Outreach

1-I (1)
2-III (3)
3-III (3)
4-III (3)

Comments:

1. Organized better ways to perform outreach,
2. Document assistance,
3. Educating the general public.
4. City definition- Purpose service delivery.
5. How to monitor or how do these contacts get added to Homeless Management Information System (HMIS).

3. Emergency shelter & transitional housing

1-
2-II (2)
3-IIIIII (6)
4-II (2)

Comments:

1. If this can be funded as a "Bridge" option under RRH it should be considered.
2. Urgent need for emergency shelter for families.
3. Emergency hotel stays.
4. Need for emergency shelter and transitional housing for families- can't be used to fund new TH.

4. Rapid Re-housing

1-III (3)
2-II (2)
3-I (1)
4-IIII (4)

Comments:

1. Be sure this is an effective intervention by reviewing housing stability of household's served at six months – one-year post served.
2. HUD's focus.

General Comments:

1. Outreach- organized plan, HUD encourages rapid rehousing.
2. ESG allocation just over $400,000 to fund these activities.
3. Outreach: documents missing
4. Grant: Wrap around services.

Question 2: Prioritize subpopulations to be served by homeless assistance programs.

Analysis: There were six subpopulations that the attendees 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 totality of the responses and discussion, the subpopulations above were

ranked in the following order:

1. Families - received the most responses as being the number one priority.
2. Persons discharged from health care/mental health facilities - received the most responses as being the second priority.
3. Persons discharged from corrections programs & institutions - received the most responses as being the third priority.
4. Youth aging out of foster care/state custody - received the most responses as being the fourth priority.
5. Chronic - received the most responses as being fifth priority.
6. Veterans - received the most responses as being sixth priority.

1. Families

Number of attendees who circled as their top priority: 3

1: I (1)
2
3
4: II (2)
5: II (2)
6

2. Persons discharged from health care/mental health facilities

Number of attendees who circled as their top priority: 1

1
2: III (3)
3: I (1)
4
5
6: I (1)

3. Persons discharged from corrections programs & institutions

1: II (2)
2
3: II (2)
4: I (1)
5
6

4. Youth aging out of foster care/state custody

Number of attendees who circled as their top priority: I

1: I (1)
2
3

4: II (2)
5: II (2)
6

5. Chronic

Number of attendees who circled as their top priority:1

1: I (1)
2: I (1)
3: II (2)
4:
5: I (1)
6:

6. Veterans

1:
2: I (1)
3:
4:
5:
6: IIII (4)

General Comments:

1. Practically no options for families and very limited support for the complicated constellations of homeless families.
2. Under 'Chronic', one commented "this is extended beyond narrow and hard to document HUD definition. Look at frequent flyers/ users of expensive emergency systems, jails, etc., prioritize the most vulnerable that is determined not just by the VI-SPDAT score."
3. Families: there are effectively no emergency /Transitional shelters for families to stay together. Families would rather be together than split up at the Nashville Rescue Mission or elsewhere, leading to families sleeping in cars, streets or burn through savings for hotel stays.
4. Youth aging out of foster care/state custody: Important to address early to prevent traumas that can lead to mental health issues, incarceration and ultimately chronic homelessness.
5. Many commented to add to this list: Elderly, LGBTQIA, gender non-conforming adults, metal health case management, disabled

Question 3. Prioritize activities to address homelessness.

Analysis: There were four activities that the attendees were asked to priority; STRMU, TBRA, Permanent Housing Facilities, Transitional Short Term Housing Facilities. Based on the totality of the responses and discussion, the activities were ranked in the following order:

1. TBRA & Permanent Housing Facilities - received same responses for being the number one priorities.
2. STRMU & Transitional Short Term Housing Facilities - received similar responses, however one attendee ranked STRMU as a number one priority.

1. Permanent housing facilities

Number of attendees that circled as top priority: II

1: I
2
3: II
4: I

Comments:
1. * the need

1. Tenant-based rental assistance (TBRA)

Number of Attendees that circled as top priority: II

1: I
2: II
3: II
4:

Comments:
1. Section 8 assistance.

2. Short-term rent, mortgage & utility assistance payments (STRMU)

1: II (2)
2: I (1)
3
4: II (2)

Comments: HOPWA specific.

2. Transitional short-term housing facilities

1:
2: II
3: I
4: II

Comments:
1. Removes a major barrier that can allow for permanent housing more rapidly.

Question 4: List top three barriers to affordable housing for persons/families that are homeless or are at-risk of homelessness.

Responses were categorized under the three top themes below.

1. Supply of Affordable housing (AH)
    a. Housing rent that matches livable wages/Supply of A.H
    b. Lack of affordable housing availability / lack of supply
    c. Long waiting lists
    d. Don't understand the process
2. Access to Affordable Housing
    a. Criminal History/background
        i. Landlords (not) accepting criminal/credit background
        ii. Selective acceptance due to low supply
        iii. Fewer landlords accepting vouchers
        iv. Evictions
    b. Transportation
        i. Lack of housing in proximity to place of work/ no transportation to employment
        ii. Lack of access to transportation
3. Readiness of Residents
    a. Lack of income to keep up with the rising costs
    b. Lack of access to affordable childcare (prevents parents from being able to work especially for pre-K, infants and toddlers.)
    c. Lack of or less than stellar Credit history
    d. No rental history
    e. Application fees and deposits
    f. Income exceeds AMI

There were recurring singular responses. The word cloud demonstrates those top responses. These included; Lack of (Affordable Housing) Supply, Transportation (Access), Income, and Criminal History.

Figure 1: Word cloud, noting the most mentioned responses.

Question 5: List top three barriers to affordable housing for persons with HIV/AIDS and their families.

Attendees agreed that many of the responses noted in Question 4, were relevant to Question 5 as well. Additional responses were categorized under the three top themes below.

1. Affordable Housing
    a. Everything mentioned in Question 4 - especially the lack of affordable housing.
2. Stigma surrounding HIV/AIDS
    a. Bias
    b. Shame
    c. Discrimination
    d. Health Situation
    e. Privacy (HIV/AIDS clients are afraid to reach out for help because of who they might see)
3. Criminalization of HIV/AIDS
    a. People who partook in sex / work are now on the registered list.

Question 6: Describe level of coordination for addressing homelessness among the following:

Analysis: This table describes attendees' thoughts on the level of coordination efforts among the following agency categories. Continuum of Care (CoC) are amongst the strongest in their coordination. Attendees expressed that the CoC was doing a much better job at getting all of the agencies around the table to do face-to-face coordination, which is working out very well. There are some agencies that could be added to these meetings because they are missing out on the benefits found in coordination. Another thought was that there are still some negative members in the CoC, but overall, the activities of coordination are very strong. Housing providers was noted as being the weakest.

Figure 2.

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

Question 7: Provide one recommendation for increasing coordination among the following:

Analysis: The common theme here was more face - to - face coordination. Bringing more service providers 'to the table' to coordinate services.

All comments are from individual surveys.

1. CoC
    a. Action Timelines- what are you and when.
    b. Continually improving. Suggestion: we need to get some stronger boundaries, some individuals who come to CoC meetings simply "disrupt" the process. 1-2 Individuals should not be allowed to stop forward movement in this community.
    c. CoC + ESG review committees should be the same members. HMIS has to expand to include mission date. Coordinated entry- expect this as a way into ALL local resources, using uniform fair, priorities, more housing, first approaches adopted to reduce barriers to affordable housing and retain housing.
    d. We could have more resources and trainings for agencies to unite on assisting our communities
    e. HMIS data sharing
    f. Getting stronger (two mentions), case conferencing, and negative attitudes.
    g. Building momentum
    h. Continuing to bring more agencies/ individuals to the table. Buying on community standards of care, using common language and practices.
    i. Case coordination, HMIS buy in for more funded agencies.

2. Housing Providers
    a. Incentives to provide housing
    b. MDHA needs to improve communication with partner service agencies. Low Income Housing Tax Credit (LIHTC)- providers need to have some incentive to take chances on homeless renters. Incentives- increase, they have worked for veterans. MDHA- needs to look at making it easier for different types of housing that can be assisted out financially, viable rates, (Shares housing, assisted living Single Room Occupancy (SRO))
    c. Realistic rates, more options (payment plans), Housing scholarships ($1,000)
    d. Incentives for landlords/ developers to provide affordable housing.
    e. Become a little more low barrier. More incentives for people providing housing.
    f. Participate in the CoC and participate as a committee. Strengthen communication between CoC providers as a group, the landlords, and the providers so they understand the need.
    g. More Support

3. Heath, Mental Health, and Service Agencies

a. Referral/Rec procedures better developed. Case coordination.
b. Continue/enhance case conferencing.
c. Emotional support and Consistency, Stableness, Classes (mental health)
d. Collaboration with nonprofit agencies, prevention of cycle if street to institution.
e. Better understanding high utilizers.
f. Classes enchase case coordination
g. Shared bulletin board for housing opportunities, rent and utility assistance.
h. More Coordination with hospital/social workers and discharge planners.

4. Local and State Government Agencies

a. Funding case coordination (fund local efforts) Mayor's office/city presence
b. Release the unused TANF dollars to local non-profit agencies
c. More investment and focus on affordable housing (affordable for low-income residents)
d. Funding, Money not being used, more present and more hands-on city. Need more money into housing and education (being elected officials)
e. Coordinate wider net of departments being present and participating in the community.
f. More funding. Local State representatives can be more present and hands on with planning.
g. One-on-one day in the life of clients/community. Visit case managers within community.
h. Use the newly developed governor's office for faith and community initiatives (privately funded)
i. Bolster CoC review of the THDA ESG applications-perhaps increase points for apps that address CoC priorities. THDA- conference calls with all CoC's across state, ESG timeline, get intentional input on Con Plan, Priorities for activities eligible for ESG (more outreach)?

Question 8: Describe Discharge Coordination procedures for the following:

Analysis: This table describes attendees' thoughts on the level of coordination procedures among the following agency categories. Overall coordination as it pertains to persons being discharged from institutions, is very weak. Attendees did note that professionals in these facilities quite often focus on the need that brought them to the facility, but do not offer coordinated discharge procedures.

Figure 3.

	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		IIIII (5)
Persons discharged from mental health facilities		IIII (4)

Persons discharged from correctional programs & institutions		IIIII (5)

Question 9: Provide one recommendation for increasing discharge coordination among the following:

Analysis: The common theme here was that more personnel in hospitals and institutions, should be trained on all of the resources available to patients upon discharge.

All Comments are from Individual Surveys:

1. **Youth aging from foster care/state custody**
    a. Staff working closely with YHDP implementation and CoC youth/ young adults.
    b. Foster care review board should collaborate with nonprofits agencies such as Monroe-Harding when kids age out.
    c. Create stronger avenues of communication between the state and the service agencies.
    d. Communication across agencies. Foster Care housing and schooling.
    e. Glossary of terms would enhance communication.
    f. Work gap for care.

2. **Persons discharged from health care facilities**
    a. Provide access to convalesce and medication including referral partners
    b. Bridge housing, more housing navigators and SSI/SSDI Outreach, Access, and Recovery (SOAR) coordinators inside hospitals like Vanderbilt has now.
    c. Offer city HMIS for hospitals
    d. There should be persons within all hospitals with current and specific information about all homeless services.
    e. A hospital wants to discharge a patient, somewhere - (like a) mission. Social workers are not connecting patients to the resources and social security. Social Workers are just looking at health, and are not looking at the total person. More coordination with other agencies is needed.
    f. Persons who are aging are discharged and do not fully understand the process (e.g. patients can be forgetful, have no family, lack of resources, and lack of knowledge.)
    g. Don't discharge people to the streets. Health Facilities should provide transportation upon discharge to shelter, non-profit, etc. Outpatient medical needs don't continue to the necessary extent while folks are living on the streets.

3. **Persons discharged from mental health facilities**
    a. Transitional housing/Rapid rehousing, case management.
    b. Support/Therapy needs to continue beyond discharge.
    c. Health Insurance Portability and Accountability Act (HIPPA) agreement to work with HMIS and address high utilizers.
    d. Mental Health facilities have similar issues as health care facilities. Should look at other city models, frequent people
    e. Same (problems) as health care facilities
    f. In reach for: city government for simply adding discharges into HMIS.

4. **Persons discharged from correctional programs & institutions**
    a. Literally anything, Department of Housing and Urban Development (HUD)reconsiders definition of homeless, coordinate housing, ID's /Birth Certificates/Social Security card, in-reach.
    b. Provide access to lawyers for expungement.
    c. Once released, focus on getting them placed at transitional housing. Help them relearn social skills, daily living, job placement, housing, ways to offer cognitive training to help them not return.
    d. In-reach and engagement.
    e. Any kind of coordination
    f. More access to folks who are currently incarcerated. Have corrections identify homeless individuals sooner and begin discharge planning.
    g. Get rid of HIPPA, need to get buy in from jails, prisons, etc.

Question 10: Comments/recommendations regarding past Action Plan discussion of ESG and HOPWA programs:

1. Great job driving this process!
2. Allow ESG funds to be used for hotel stays.

Session 2: 2020 Action Plan consultation: Non-Housing Community Development November 19, 2019

9 persons (exclusive of MDHA staff) attended representing Metro (Action Commission and Library), nonprofits, church, Community Development Financial Institution (CDFI); and real estate research.

Analysis: Major themes in this discussion included ideas that poverty can be alleviated by providing adequate living wages, and support for the working class. This support can come in the form of adequate childcare, transportation, and community based support implemented through public community centers.

Question 1:Brainstorm Barriers to Reducing Poverty

1. Customer voice-Lack of hearing from population affected
2. No childcare + jobs
3. Living wage- Too low-need multiple jobs
4. Lack of access to non-predatory lending
5. Adequate transportation
6. Lack of technology in homes/ Lack of technology literacy
7. Traffic-Opportunity costs of lost time
8. Systems barriers e.g. child back support
9. Fiscal Cliff—No transition from program-support-self sufficiency
10. No social capital- No "village"
11. Bad Credit
12. Jobs/Housing imbalance = Disconnection
13. Selling homes= Gen wealth – Lack of Financial education
14. Poverty= survival
15. Living wage (too low)
16. Inadequate transportation
17. No access to technology
18. Bad credit
19. Giving up health
20. Inadequate childcare

Comments from Individual Surveys

21. Access to non-predatory lending.
22. Adequate transportation.
23. Lack of technology in HUD homes.
24. Competing. Transportation- Smyrna/ Nashville rents not making money.
25. Systems barriers- back child support, fiscal cliff, no transition panel coming off benefits, reduction of benefits.
26. Social Capital.
27. Jobs and housing in balance.
28. Selling homes.
29. Lack of framework

Question 1A: Prioritize Top Three Barriers to Reducing Poverty

1. Inadequate Living Wages

2. Inadequate childcare

3. Limited or no access to Education, Technology, and Training

Question 2 :Brainstorm non-housing community development needs:

1. Public Facilities (e.g. Community Centers)
    a. Community Centers= Training for Micro-enterprise
    b. No Public Facilities
    c. Community centers do not open on weekend
    d. Funding is lacking for operations
    e. Madison center outgrown
    f. Need to update older centers
    g. Rethinking the role of community centers
        - E.g., mixed use, tech, etc.
        - Adequate structured programs (outcomes)
    h. Connect to public housing spaces (community centers/rooms)
    i. Filters down to everything else! Use to leverage and implement

    Comments from Individual Surveys

    j. No outlet for children, not open on the weekends, no funding for weekends. What if the facilities could be mixed-use?
    k. No access to community centers on weekends.
    l. Limit access, not open on weekends. Need funds to staff. Many centers are operating at capacity. Update older community centers.
    m. On weekends community centers (should be) for youth. No operating money. Use MDHA community centers for exercise classes.

2. Public improvements & infrastructure (i.e., sidewalks, stormwater improvements)
    a. Sidewalks
    b. Improve bus stops – Shelters and platforms
    c. Extend bus times/Run times
    d. Outcomes start here* Direct focus* end here

    Comments from Individual Surveys

    e. Holes, curbs, drainage, Need equipment
    f. Bus stop shelters
    g. Sidewalks going up everywhere, short sidewalk space in Nashville, drainage, shelter, crossover bridges needed.
    h. Crosswalks in heavy walking traffic areas

3. Public Services (i.e., healthy food initiatives, summer youth programs, youth employment opportunities)
    a. Healthy foods
    b. After school programs
    c. More Technology partnerships with private industry. MDHA can write grant if applicable.
    d. Small business incubator, access
    e. Youth makes spaces
    f. Raised-bed gardens. Place them at MDHA properties. Increase fresh vegetables. After school and school breaks: art therapy workshops, now only funding during summer.

Comments from Individual Surveys

g. Small business incubator, access
h. Youth makes spaces
i. Raised-bed gardens. Place them at MDHA properties. Increase fresh vegetables. After school and school breaks: art therapy workshops, now only funded during summer.

4. Economic Development (i.e., microenterprise assistance, façade loans, financial empowerment training in conjunction with technical assistance)
    a. Preserving local businesses
    b. Overreaching priority
    c. Need more sustained training e.g., corner to corner
    d. Support with books, systems, etc.
    e. Regional training centers/place based
    f. Microenterprise. Small business incubators, again, placed based
    g. Connect with other service providers
    h. Access for community

    Comments from Individual Surveys

    i. Teen centers learn skills presenting local business.

Additional Comments:

1. Wire fraud, compensation agreement
2. Developers in Nashville are not paying for sidewalks, so where is the money (city money) they use to pay for sidewalks going. Should this money be redirected?

Question 2A: Prioritize top three non-housing community development activities:

1. Repurpose / Reimagine the public facilities; mainly libraries, and community centers. They are underutilized in many communities, and can be used for more engaging programming, access to technology, and counseling spaces. Can also be used as partnerships with businesses (e.g. technology, trainings).
2. Economic Development and workforce development. Incentivized entrepreneurial development, increase financial literacy, general education and business startup-training.
3. Increase workforce services. For example, economic development micro- entrepreneurship, financial training, youth, year round employment opportunities and continue to provide needed general public services.

Question 3: 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. Base use of funds on priority of need, instead of just AMI percentage
2. Outlying communities also need assistance; for example, areas like Joelton, Antioch
3. How do you define impact- in low vs high concentration
4. Census may change how funds are dispersed
5. There is a large demand for housing rehab
6. Can leave % more open ended
7. Clarify plan for reallocation of money
8. Housing – Non-Housing

Additional Comments:

1. Good Discussion. Would like to meet earlier in the day. Would like to review some data. We are meeting to prepare for a healthier discussion. Maybe you passed it out and I missed out. Guidelines for Emergency Solutions Grant (ESG); CDBG, Housing Opportunities for Persons with Aids (HOPWA). Thank you for your thoughtfulness regarding the needs of the community.
2. Would love to see wider focus in non-housing programing. Open youth programs to include after school programs and workshops, not just summer programs. This would allow nonprofits to bring existing programs into community centers and community rooms. Increase technology education and training for youth and adults.

Session 3: 2020 Action Plan Consultation: Affordable Housing & Affirmatively Furthering Fair Housing, November 20, 2019

4 persons (exclusive of MDHA staff) attended representing builders, developers, lenders and nonprofit.

Analysis: Major themes in this discussion included ideas that pre-development costs are a significant barrier to providing Affordable Housing. Also increased education is needed amongst the public and mostly, amongst political leadership.

Question 1: Brainstorm the top barriers to affordable housing in Nashville- Davidson County and why?

1. Pre-Development money- out of pocket expense. Pre-Development is often needed for grant money
2. Land costs money and infrastructure (sidewalks, tap fees)
3. Home Program 53 rented units and 18 for Sale
4. Utility costs of raw land
5. Short supply of contractors. Length of time of appraisals are too long
6. Affordable housing taxed same as regular property
7. Regarding Pilot and LIHTC - Five-year gap-Paying- full assessed tax rate, but with "affordable" rents-it makes numbers not work.
8. Lack of subsidies to make projects feasible for Affordable housing
9. Length of time for predevelopment- Reduce holding costs, etc. Streamline the approval process
10. Zoning, Nimby, lack of Political will
11. Grants requested housing sub's

Comments from Individual Surveys

12. Development fees- you can get grant money or determine if it is feasible.
13. Tap fees.
14. Land costs, infrastructure, utilities costs for new land (Sewer water roads), and short supply of workers.
15. Timing.
16. Short on units, short on contractors.
17. Need tax credits and subsidies.
18. Property taxes.
19. Lacking programs and subsidies.

Question 2: When addressing affordable housing in Nashville- Davidson County, what should be the priorities (in terms of activities and sub-populations).

1. More education of political leadership and policy is needed
2. 1
3. Subsidies for workforce housing 80%
4. Streamline-reduced fees
5. Pilot available to non LIHTC and include mixed income properties. To encourage true mixture of incomes/No concentration of Affordable housing.

Comments from Individual Surveys

6. Pilot to fund to non-LIHTC (mixed income). 80% workforce housing. Streamline and reduce entitlements
7. More Education of political leadership and allow them to be more included in the process.

8. Encourage mixed income subsidy to (create) mixed income.
9. Pilot available to non-LIHTC, mixed income properties.

Question 3: Which areas do you think funds should be targeted? (e.g., near transit, high density residential areas, low density residential areas...)

1. Revise transit routes to where affordable housing is built.
2. Walkable areas
3. More coordination between private, public, agencies to plan proactively for where affordable housing needs to go.
4. Where Place based-agencies concentrate. Target efforts.

Comments from Individual Surveys

5. Revise transit routes to where?

Question 4: What suggestions do you have for improving knowledge about fair housing and removing barriers to housing opportunities in Nashville-Davidson County?

1. Need to change how Affordable housing is presented. Currently affordable housing is a stigma. Using the word 'Attainable' is better
2. Educate new Council Members
3. Better marketing of affordable housing
4. Affordable is too broad
5. More advocacy for Affordable housing – A specific advocacy group is needed.

Comments from Individual Surveys

6. Action plan/Map. Place based agencies. Council members.
7. The difference between affordable - low income.
8. New council members need to be educated about needs and spearhead initiatives to identify land / properties / areas where affordable housing should go. I.e. an Affordable Housing 'land use' or 'policy' plan/map.
9. Communicating what affordable really means and have a unified message.
10. Need specific advocacy groups that advocates for affordable housing.

Question 5: How can MDHA increase the effectiveness of its housing programs, other than an increase in funding?

1. MDHA council breakfast- Education and deep dive on affordable housing may be needed

Comments from Individual Surveys

1. Pilot program promote mixed use (new construction) Fair housing council to advocate for housing.
2. MDHA barriers are at the granting source and stipulations.
3. Workshops by MDHA for council members.
4. Zoning and zoning changes for affordable housing.
5. Political process.
6. Lack of streamline in metro departments.
7. Reduce holding time.
8. Work with has to be funneled based on the criteria

APPENDIX D
PUBLIC
NOTICES

REVISED PUBLIC NOTICE

REQUEST FOR PUBLIC COMMENT AND NOTICE OF PUBLIC HEARING

SUBSTANTIAL AMENDMENT 2 TO THE 2018-2023 CONSOLIDATED PLAN FOR HOUSING AND COMMUNITY DEVELOPMENT
AND
2020-2021 ANNUAL UPDATE FOR PROGRAM YEAR 3 (2020 ACTION PLAN)

This Public Notice replaces the previously-issued Public Notice on the draft Substantial Amendment 2 and Program Year 3 – 2020 Action Plan. This Public Notice advises of the change in the date for the Public Hearing previously scheduled at J. Henry Hale Apartments Community Room from 5:30 p.m. CDT March 23, 2020, to 2 p.m. CDT April 9, 2020, via gotowebinar.com.

Public Hearing: The Metropolitan Development and Housing Agency (MDHA) will host a public hearing on the draft Substantial Amendment 2 to the 2018-2023 Consolidated Plan for Housing and Community Development and 2020-2021 Annual Update for Program Year 3 (2020 Action Plan) on:

2 p.m. CDT Monday, April 9, 2020, via gotowebinar.com

Please register for 2020 Action Plan Public Hearing scheduled for 2 p.m. CDT on April 9, 2020, at: https://attendee.gotowebinar.com/register/6002177207181179149

After registering, you will receive a confirmation email containing information about joining the webinar.

Public Comment Period: The draft Substantial Amendment 2 and 2020 Action Plan was made available for public examination and comment on March 10, 2020.

- Members of the public may download copies from MDHA's website at www.nashville-mdha.org/consolidated-plan or may request copies by contacting the MDHA Community Development Department at 615-252-8505 or Telephone Device for the Deaf (TDD) at 615-252-8599.

- Also, copies will be available for pickup at MDHA's Community Development Department, located 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, April 10, 2020.

- 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 Substantial Amendment 2 to the 2018-2023 Consolidated Plan for Housing and Community Development and the 2020-2021 Annual Update for Program Year 3 (2020 Action Plan). The draft Substantial Amendment provides for the following: 1) Allow Community Development Block Grant (CDBG) funds allocated for Weatherization Assistance to serve homeowners whose incomes are at or below 80% of the Area Median Income (AMI) limit as per CDBG income guidelines; 2) Provide amended language to the Citizen Participation Plan contained in Appendix A of the Consolidated Plan to clarify that the criteria for a substantial amendment is a fiscal change in any program/project that is increased or decreased by more than 25% of the total HUD allocation of CDBG, Home Investment Partnerships Program (HOME), Emergency Solutions Grant (ESG) and Housing Opportunities for Persons with Aids (HOPWA) of the effected program year with the exception as noted. The Citizen Participation Plan, as amended, is included as Appendix A to the Annual Update for Program Year 3; and 3) Amend language to the description section of the Strategic Plan (SP) 25 Priority Need #3 – Retain Affordable Housing Stock of the Consolidated Plan to clarify that the amount of CDBG funds to be allocated to this Priority Need will be a majority of the balance of funds from the annual allocation after deductions for the 20% allocation for Administrative Activities and 15% for Public Service Activities.

The 2020 Action Plan describes community needs and funding priorities for the 2020-2021 program year (June 1, 2020, through May 31, 2021) and serves as Metropolitan Government of Nashville and Davidson County's application for receiving funds for the following programs: CDBG, HOME, ESG and 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 2020 Action Plan.

Funding Priorities:

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

Anticipated Resources:

	CDBG	HOME	ESG	HOPWA
2020 Allocation	$5,313,699.00	$ 2,591,602.00	$449,229.00	$1,547,366.00
Estimated Program Income	$ 427,383.00	$ 316,877.00	$ -	$ -
TOTAL	**$5,741,082.00**	**$ 2,908,479.00**	**$449,229.00**	**$1,547,366.00**

2020-2021 Proposed Allocations:

CDBG	
Project Type	**Proposed Budget**
Administration & Planning	$ 1,148,216.00
Public Services	$ 804,613.00
Housing	$ 2,402,702.00

HOME	
Project Type	**Proposed Budget**
Administration	$ 290,848.00
New Construction Ownership Programs	$ 290.848.20
New Construction Rental Programs	$2,035,935.00

Public Facilities & Infrastructure	$ 1,185,549.00
Economic Development	$ 200,002.00
TOTAL	**$ 5,741,082.00**

New Non-Profit Set Aside	$ 290,848.00
TOTAL	**$2,908,479.00**

ESG	
Project Type	**Proposed Budget**
Administration	$ 33,692.00
Emergency Shelter & Transitional Housing; Rapid Re-Housing; Street Outreach; Prevention;	$ 411,045.00
HMIS	$ 4,492.00
TOTAL	**$ 449,229.00**

HOPWA	
Project Type	**Proposed Budget**
Administration	$ 154,737.00
Facility-Based Housing Assistance; Short-term Rent, Mortgage & Utilities; TBRA; Supportive Services	$1,392,629.00
TOTAL	**$1,547,366.00**

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

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

如果需要本通知的中文翻译，请打电话 615-252-8505

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

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

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

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

PUBLIC NOTICE

REQUEST FOR PUBLIC COMMENT AND NOTICE OF PUBLIC HEARING

SUBSTANTIAL AMENDMENT 2 TO THE 2018-2023 CONSOLIDATED PLAN FOR HOUSING AND COMMUNITY DEVELOPMENT AND 2020-2021 ANNUAL UPDATE FOR PROGRAM YEAR THREE (2020 ACTION PLAN)

Public Hearings: The Metropolitan Development and Housing Agency (MDHA) will host a public hearing on the draft Substantial Amendment 2 to the 2018-2023 Consolidated Plan for Housing and Community Development and 2020-2021 Annual Update for Program Year Three (2020 Action Plan) on:

Monday, March 23, 2020 5:30 p.m.
J. Henry Hale Apartments Community Room
1433 Jo Johnston Avenue
Nashville, TN 37203

Public Comment Period: Beginning Tuesday, March 10, 2020, the draft Substantial Amendment 2 and 2020 Action Plan will be available for public examination and comment. Members of the public may download copies from MDHA's website at www.nashville-mdha.org/consolidated-plan or may request copies by contacting the MDHA Community Development Department at 615-252-8505 or TDD at 615-252-8599. Also, copies will be available at MDHA's Community Development Department, located at 712 South Sixth Street, Nashville, TN 37206, between the hours of 7:30 a.m. and 4:00 p.m., Monday-Friday. MDHA will receive written comments through 4:00 p.m., central time, on Friday, April 10, 2020. Comments may be submitted electronically at consolidatedplan@nashville-mdha.org, faxed to 615-252-8533 (Attention: Consolidated Plan), mailed to MDHA Community Development Department, Attention: Consolidated Plan, P.O. Box 846, Nashville, TN 37202, or hand-delivered to MDHA Community Development Department, Attention: Consolidated Plan, 712 South Sixth Street, Nashville TN 37206.

Purpose and Summary: MDHA has prepared for submittal to the U.S. Department of Housing and Urban Development (HUD) a draft Substantial Amendment 2 to the 2018-2023 Consolidated Plan for Housing and Community Development and the 2020-2021 Annual Update for Program Year Three (2020 Action Plan). The draft Substantial Amendment provides for the following: 1) Allow CDBG funds allocated for Weatherization Assistance to serve homeowners whose incomes are at or below 80% of AMI limit as per CDBG income guidelines; 2) Provide amended language to the Citizen Participation Plan contained in Appendix A of the Consolidated Plan to clarify that the criteria for a substantial amendment is a fiscal change in any program/project that is increased or decreased by more than 25% of the total HUD allocation of CDBG, HOME, ESG and HOPWA of the effected program year with the exception as noted. The Citizen Participation Plan, as amended, is included as Appendix A to the Annual Update for Program Year 3; and 3) Amend language to the description section of the Strategic Plan (SP) 25 Priority Need #3 – Retain Affordable Housing Stock, of the Consolidated Plan to clarify that the amount of CDBG funds to be allocated to this Priority Need will be a majority of the balance of funds from the annual allocation after deductions for the 20% allocation for Administrative Activities and 15% for Public Service Activities.

The 2020 Action Plan describes community needs and funding priorities for the 2020-2021 program year (June 1, 2020 through May 31, 2021) and serves as Metropolitan Nashville-Davidson County's application for receiving funds for the following programs: Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), the Emergency Solutions Grant (ESG), and Housing

Opportunities for Persons with AIDS (HOPWA). Proposed funding allocations are intended to address the priority needs identified in the 2018-2023 Consolidated Plan, as amended, and to benefit low- and moderate-income households and areas. Details regarding specific activities to be funded are provided in the 2020 Action Plan.

Funding Priorities:

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

Anticipated Resources:

	CDBG	HOME	ESG	HOPWA
2020 Allocation	$5,313,699.00	$ 2,591,602.00	$449,229.00	$1,547,366.00
Estimated Program Income	$ 427,383.00	$ 316,877.00	$ -	$ -
TOTAL	**$5,741,082.00**	**$ 2,908,479.00**	**$449,229.00**	**$1,547,366.00**

2020-2021 Proposed Allocations:

CDBG	
Project Type	**Proposed Budget**
Administration & Planning	$ 1,148,216.00
Public Services	$ 804,613.00
Housing	$ 2,402,702.00
Public Facilities & Infrastructure	$ 1,185,549.00
Economic Development	$ 200,002.00
TOTAL	**$ 5,741,082.00**

HOME	
Project Type	**Proposed Budget**
Administration	$ 290,848.00
New Construction Ownership Programs	$ 290.848.20
New Construction Rental Programs	$2,035,935.00
New Non-Profit Set Aside	$ 290,848.00
TOTAL	**$2,908,479.00**

ESG	
Project Type	**Proposed Budget**
Administration	$ 33,692.00
Emergency Shelter & Transitional Housing; Rapid Re-Housing; Street Outreach; Prevention;	$ 411,045.00
HMIS	$ 4,492.00
TOTAL	**$ 449,229.00**

HOPWA	
Project Type	**Proposed Budget**
Administration	$ 154,737.00
Facility-Based Housing Assistance; Short-term Rent, Mortgage & Utilities; TBRA; Supportive Services	$1,392,629.00
TOTAL	**$1,547,366.00**

Request for Accommodations: MDHA makes every effort to provide reasonable accommodations to

assist persons with disabilities. Any person needing assistance in accessing this information or who has other needs that require special accommodations may contact 615-252-8562 or TDD at 615-252-8599.

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

如果需要本通知的中文翻译，请打电话 615-252-8505

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

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

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

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

APPENDIX E
SUMMARY OF PUBLIC COMMENTS AND MDHA RESPONSES

Comments/Questions received at the April 9, 2020 Virtual Public Hearing -

Q1: "Will there be any efforts through these funds to help people that have lost non-traditional homes? I know several people who had structures, but not houses under the Jefferson Street Bridge that were heavily affected."

R1: Emergency Solutions Grant (ESG) funds will be made available to nonprofit partners for activities such as rapid-rehousing, street outreach, prevention, shelter operations and essential services that will provide assistance to Homeless Individuals.

Q2: "I am simply curious for an update on how our various MDHA communities are functioning regarding COVID19? How does the stay at home look? Do people have masks and gloves and if so are they using them? Do we have specific stats on illness clusters?"

R2: This question was forwarded to MDHA's Director of Communication who provided a direct response to this individual.

Q3: "Are there any efforts being made to reduce the percent of CDBG funding going towards administrative costs so that more can be put towards housing?"

R3: No

Q4: "What if any changes have been made to the 2020 - 2021 pilot programs?"

R4: There have been no substantive changes other than Metro Council increased the annual abatement capacity from a maximum of $2 million per year in new first year abatements to $2.5 million. The PILOT program can still only be used in conjunction with LIHTC projects.

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.

<u>Segregation</u>

- 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

<u>R/ECAPs</u>

- 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
1. Increase the number of affordable housing units accessible to all protected classes.	• 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	• Segregation • R/ECAPs • Disability and Access • Disparities in Access to Opportunity • Disproportionate Housing Needs • Publicly Supported Housing	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) 1(b). Utilize MDHA & Metro property to create a range of affordable, accessible housing options. (2-5 years) 1(c). Provide public incentives to create new housing in areas of opportunity and/or to create permanent supportive housing. (1-5 years) 1(d). Incentivize creation of affordable housing on transit corridors.	1(a). MDHA (CP) 1(b). MDHA (CP & PHA), Metro 1(c). MDHA (CP) & Metro 1(d). MDHA (CP & PHA), Metro 1(e). Metro

			(2-5 years) 1(e). Continue to fund the Barnes Fund. (1-5 years)	
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.				
2. Preserve existing affordable housing units, especially for persons with Limited English Proficiency (LEP) and persons with disabilities (and the elderly).	• Displacement of residents due to economic pressure • Lack of affordable, accessible housing in a range of unit sizes • Lack of assistance for housing accessibility modifications • Loss of affordable housing • Occupancy	• Segregation • R/ECAPs • Disability and Access • Disparities in Access to Opportunity • Disproportionate Housing Needs	2(a). Dedicate public funding and/or make other funding available for making accessibility improvements for low-income persons with disabilities. (1-5 years) 2(b). Continue to promote tax freeze program. (1-5 years) 2(c). Coordinate with Metro Codes on	2(a). MDHA (CP) & Metro 2(b). Metro 2(c). Metro & MDHA (CP) 2(d). Metro, MDHA (CP & PHA)

	codes and restrictions • Deteriorated and abandoned properties		providing assistance to homes in need of repair. (1-5 years) 2(d). Attempt to intervene when potential loss of affordable housing is identified. (1-5 years)	
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.				
3. Increase access to affordable housing opportunities, especially for persons with Limited English Proficiency (LEP) and persons	• Access to publicly supported housing for persons with disabilities • Admissions and occupancy policies and procedures, including preferences in publicly supported housing	• Segregation • R/ECAPs • Disability and Access • Disparities in Access to Opportunity • Disproportionate Housing Needs • Publicly Supported Housing	3(a). Adopt a model to quickly connect persons who are chronically homeless to housing. (1 year) 3(b). Engage and incentivize landlords with housing in opportunity areas to accept Vouchers. (1-5 years)	3(a). MDHA (CP & PHA), Metro, Continuum of Care 3(b). MDHA (PHA & CP), Metro 3(c). MDHA (CP & PHA), Metro 3(d). MDHA (CP & PHA),

with disabilities .	• 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		3(c). Expand language access to leases, loan documents, etc. (1-5 years) 3(d). Require that all publicly-funded affordable housing projects meet universal design or visitability standards. (1-5 years) 3(e). Develop creative homeownership (purchase). Options. (1-5 years) 3(f). Review and make MDHA's policy for considering criminal history available to the public. (1-2 years) 3(g). Create a countywide housing navigation system. (1-5 years)	Metro 3(e). Metro, MDHA (CP) 3(f). MDHA (PHA) 3(g). MDHA (CP), Metro
Discussion: Goals 1 & 2 are intended to address the built environment by creating and preserving housing units, while Goals 3 & 4 are intended to assist persons with protected characteristics overcome barriers to securing and/or retaining this housing. 3(a) – MDHA and Metro will work with the Continuum of Care (CoC) to educate homeless service providers and landlords about Housing First and to align programs and funding sources that will address Disability and Access, Disproportionate Housing Needs, and Publicly Supported Housing. 3(b) – The analysis shows an overwhelming concentration of Vouchers in Segregated areas, R/ECAPs, and areas with Disparities in Access to Opportunity; providing incentives to landlords with rental housing in other areas of the county will decrease Vouchers concentrated in these areas. 3(c) – Metro and MDHA will partner with housing industry associations to facilitate (train				

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

4. Create/expand programs to help tenants and homeowners retain housing.	• Access to publicly supported housing for persons with disabilities • Lack of affordable in-home or community-based supportive services • Lack of affordable, integrated housing for individuals who need supportive services • Location and type of affordable housing	Disability and Access Disproportionate Housing Needs Publicly Supported Housing	4(a). Make process for requesting reasonable accommodation in MDHA-owned housing publicly available. (<1 year) 4(b). Align resources and improve strategies for homeless prevention. (1-5 years) 4(c). Establish interventions to evictions for persons with mental impairments. (1-3 years)	4(a). MDHA (PHA) 4(b). MDHA (PHA & CP), Metro, Continuum of Care 4(c). MDHA (PHA & CP), Metro, Continuum of Care
Discussion: These programs are intended to help persons with disabilities overcome barriers to retaining housing outside of the loss of a physical unit as discussed in Goal #2. 4(a) – MDHA will make its process for requesting reasonable accommodation in its housing easily accessible by posting on its website and making copies available in property offices. 4(b) – MDHA in coordination with Metro and the CoC will utilize data to prioritize funding decisions that will prevent at-risk persons with chronic illness from becoming homeless. 4(c) – MDHA and Metro will work with mental health providers, case managers and landlords to develop a protocol to intervene when an individual in housing who is experiencing a mental health crisis to minimize the risk of an eviction.				
5. Create/expand programs [targeted to persons in Segregated areas and R/ECAPs] to increase self-sufficiency.	• Access to financial services • Lending discrimination • Source of income discrimination • Lack of opportunity due to high housing costs	• Segregation • R/ECAPs • Disparities in Access to Opportunity	5(a). Expand financial counseling programs into R/ECAPs, particularly to youth (1-5 years) 5(b). Expand digital inclusion opportunities at MDHA properties. (2-5 years)	5(a). Metro 5(b). MDHA (PHA)

Discussion: Goals 1-4 focused on creating and retaining housing outside of Segregated areas, R/ECAPs, and area with Disparities in Access to Opportunity and increasing access to/preserving 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.				
6. Increase public investment in underserved neighborhoods.	• Lack of community revitalization strategies • Lack of public investment in specific neighborhoods, including services or amenities	• Segregation • R/ECAPs • Disparities in Access to Opportunity • Disproportionate Housing Needs • Publicly Supported Housing	6(a). Leverage resources to redevelop public housing properties in R/ECAPs to create mixed-income, mixed-use communities. (1-5+ years) 6(b). Continue to target public funds for neighborhood programs and infrastructure projects in R/ECAPs. (1-5 years)	6(a). MDHA (PHA & CP), Metro 6(b). MDHA (CP), Metro
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.				
7. Incentivize private investment in underserved neighborhoods.	• Lack of community revitalization strategies • Lack of private investment in specific	• Segregation • R/ECAPs • Disparities in Access to Opportunity • Disproportionate Housing Needs	Offer incentives to attract private investment in R/ECAPs and areas with concentrations of publicly supported	Metro, MDHA (PHA & CP)

	neighborhoods • Land use and zoning		housing. (2-5 years)	
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.				
8. Expand fair housing outreach, education, and enforcement activities.	• Community opposition • Lack of local public fair housing enforcement • Lending discrimination • Private discrimination	• Segregation • R/ECAPs • Disability and Access • Disparities in Access to Opportunity • Disproportionate Housing Needs	8(a). Coordinate with neighborhood groups and community leaders to identify fair housing issues. (<1 year) 8(b). Continue to use CDBG funds to support fair housing outreach, education, and enforcement activities. (1-5 years) 8(c). Consider creating a local mechanism to enforce Fair Housing complaints. (1-2 years)	8(a). Metro, MDHA (CP) 8(b). MDHA (CP) 8(c). Metro
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
CITIZEN PARTICIPATION PLAN OF THE CONSOLIDATED PLAN

INTRODUCTION

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

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

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

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

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

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

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

THE CONSOLIDATED PLAN & ANNUAL ACTION PLAN

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

Public Notice & Publication

MDHA will publish a public notice in a non-legal section of *The Tennessean* and at least one weekly minority and Hispanic newspaper, to announce the public comment period, at least 10 days before a public hearing. MDHA will also publish a notice on its website. The notice will include a general summary and the location where copies of the entire plan may be obtained. MDHA will also send the notice to all members of the Consolidated Plan mailing list. Notices will also be distributed to local elected officials, affordable housing forums/groups, public housing Resident Associations, Continuum of Care membership, and other interested parties and groups.

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

Public Hearings

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

MDHA will make every effort to provide reasonable accommodations and services to assist persons with disabilities or sensory impairments. Translation services may be offered upon request.

Public Comments

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

PLAN AMENDMENTS

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

Criteria for Substantial Amendments

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

- A fiscal change in any program/project that is increased or decreased by more than 25% of the total allocation of CDBG, HOME, ESG and HOPWA funds for the program year with the following exception:
    - Funds were made available through the process described in the Action Plan and could not be committed/expended due to lack of demand may be reallocated to other eligible activities.
- A change in funding allocation priorities described in the Consolidated Plan,
- A new program not previously described in an annual action plan,
- The deletion of an activity described in the Consolidated Plan, or
- A substantial amendment is required by HUD.

Public Notice & Publication

In the case of any proposed substantial amendment, MDHA will publish a public notice in *The Tennessean* and at least one weekly minority and Hispanic newspaper to announce the public comment period a minimum of 10 days before a public hearing. The notice will include a summary of the amendment and a list of the locations where

copies of the amendment may be examined. MDHA will also maintain a mailing list of interested parties and send information regarding the amendment to all members of the mailing list.

Public Comments

MDHA will provide a period of at least 30 days to receive comments on the substantial amendment before the amendment is implemented. MDHA will consider any comments or views of citizens received in writing, or orally at public hearings, if any, when adopting the amendment. MDHA will attach a summary of these comments and MDHA's response to the final adopted amendment.

PERFORMANCE REPORTS

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

Public Notice & Publication

MDHA will publish a public notice in *The Tennessean* and at least one weekly minority and Hispanic newspaper to announce the public comment period a minimum of 10 days before a public hearing. MDHA will also maintain a mailing list of interested parties and send information to all members of the mailing list. MDHA will provide a reasonable number of free copies of the performance report to citizens and groups that request it. Copies of each report will be available for review at MDHA and on the MDHA website at: www.nashville-mdha.org/consolidated_plan.php**.**

Public Hearings

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

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

Public Comments

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

INFORMATION

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

Records may be reviewed by appointment during regular business hours.

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

TECHNICAL ASSISTANCE

MDHA must provide for technical assistance to groups representative of persons of low- and moderate-income that request such assistance in developing proposals for funding assistance under any of the programs covered by the Consolidated Plan. To request technical assistance, contact the Development Department using the contact information listed in the Introduction.

COMPLAINTS

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

DISPLACEMENT

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

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

For Residential Displacements

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

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

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

METROPOLITAN NASHVILLE-DAVIDSON COUNTY, TENNESSEE

EXHIBITS

SUBSTANTIAL AMENDMENT 2
TO THE
2018-2023 CONSOLIDATED PLAN
FOR
HOUSING AND COMMUNITY DEVEVLOPMENT
AND
2020-2021 ANNUAL UPDATE
TO THE
2018-2023 CONSOLIDATED PLAN
FOR
HOUSING AND COMMUNITY DEVELOPMENT

PROGRAM YEAR THREE

For the period June 1, 2020 – May 31, 2021

Prepared by:

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

Updated April 13, 2020

Substantial Amendment 2 to the 2018-2023 Consolidated Plan

For

Housing and Community Development

And

2020-2021 Annual Update to the 2018-2023 Consolidated Plan

(2020 Action Plan) Program Year Three

EXHIBITS

Exhibit 1 – Determining a Census Tract Number

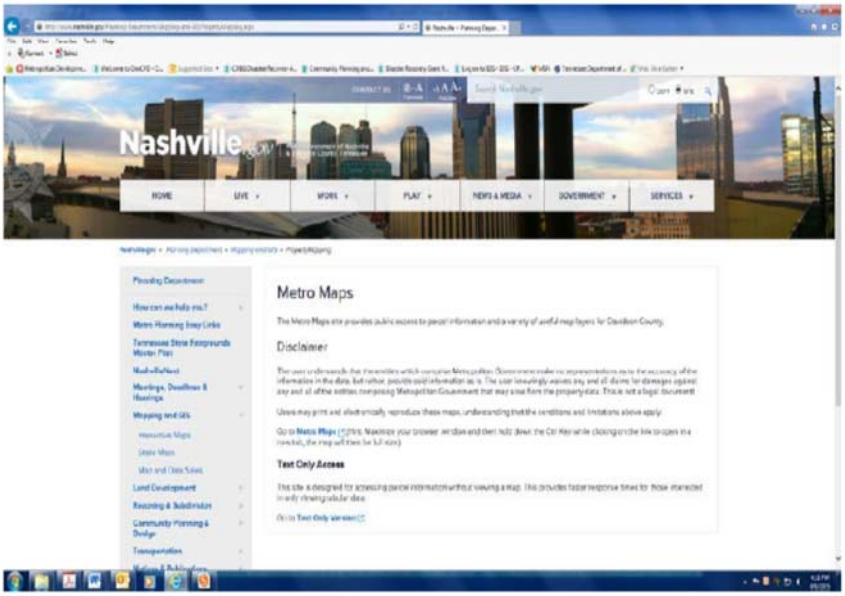
Exhibit 2 – Notice of 2020 Allocations

EXHIBIT 1

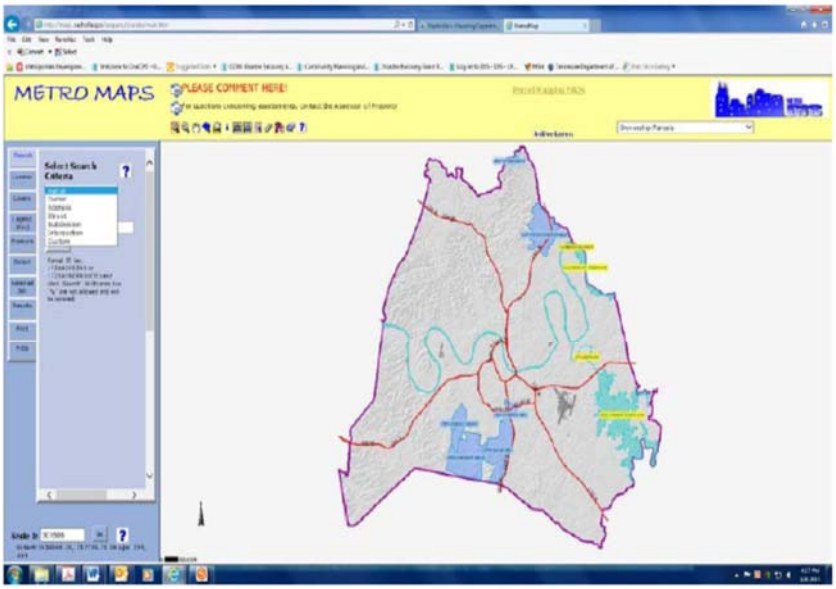
HOW TO DETERMINE YOUR CENSUS TRACT

1. Go to: http://www.nashville.gov/Planning-Department/Mapping-and-GIS/PropertyMapping.aspx.

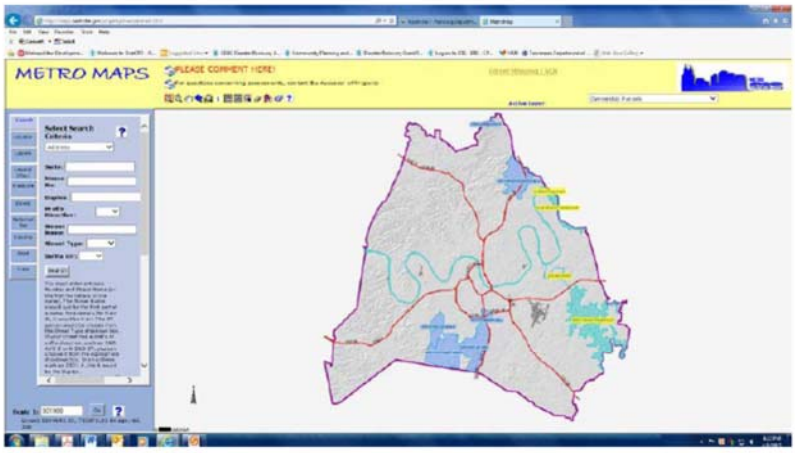
2. Click on: **Metro Maps** in the sentence that says, "Go to **Metro Maps**".



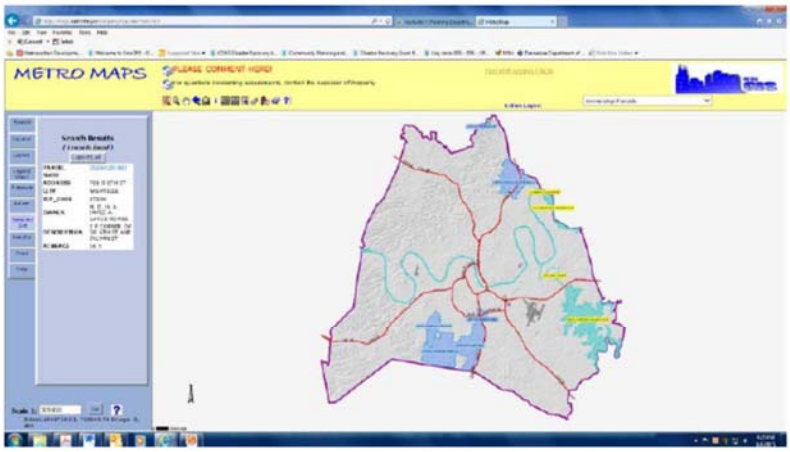
3. In the drop-down box under Select Search Criteria, select Address.



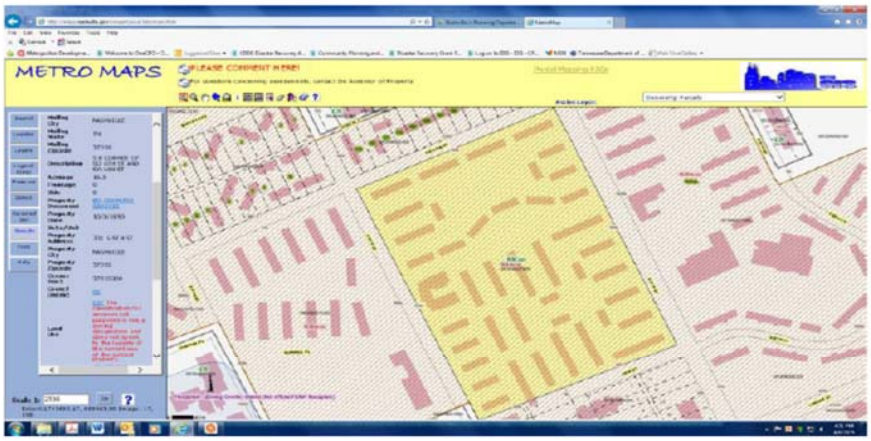
4. Enter your address, and then click on Search.



5. Under Search Results, click on the highlighted parcel number. *NOTE: The address for MDHA's central office is used as an example.*



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



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

EXHIBIT 2

HUD NOTIFICATION of 2020 ALLOCATIONS

FY2020 Allocations - Tennessee								
KEY	CNSRTKEY	NAME	STA	CDBG20	HOME20	ESG20	HOPWA20	HTF20
471368		Nashville-Davidson	TN	$5,313,699	$2,591,602	$449,229	$1,547,366	$0