

State of Tennessee

2018-19 Annual Action Plan

Executive Summary

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

1. Introduction

The Annual Action Plan serves as the State of Tennessee's annual application to the U.S. Department of Housing and Urban Development (HUD) for the funding of HUD's five formula grant programs: Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), Emergency Solutions Grant (ESG), Housing Trust Fund (HTF), and Housing Opportunities for Persons Living with AIDS (HOPWA) Program. The 2018-19 Action Plan describes actions on behalf of the State of Tennessee to administer and implement the Consolidated Plan grant programs during the Program Year beginning July 1, 2018 through June 30, 2019.

The names of the grant programs, the administering state agencies, and the 2017-18 allocations are listed below. We expect similar allocations for Program Year 2018-19.

- Community Development Block Grant (CDBG) administered by the Tennessee Department of Economic and Community Development (ECD), allocation: \$24,977,133
- HOME Investment Partnerships Program (HOME) administered by Tennessee Housing Development Agency (THDA), allocation: \$9,582,153
- Housing Trust Fund (HTF) administered by THDA, allocation: \$3,160,279
- Emergency Solutions Grant (ESG) administered by THDA, allocation: \$3,640,860
- Housing Opportunities for Persons with AIDS (HOPWA) Program administered by the Tennessee Department of Health (DOH), allocation: \$1,097,514

The Annual Action Plan describes the amounts and source of the five formula grant funds expected to be made available during Program Year 2018-19 and discusses the methods by which funds will be distributed to eligible applicants by the administering agencies. Funds are made available either through a competitive grant process, through a formula basis, or in some cases, both. Also discussed are other federal and non-federal resources administered by THDA and include: Section 8 Housing Choice Voucher Program, Section 8 Contract Administration, the Low Income Housing Tax Credit Program (LIHTC), the Tennessee Housing Trust Fund, the Community Investment Tax Credit (CITC) Program, and the Homeownership Programs.

If grant funds for HOME, ESG, HTF, and HOPWA differ from the expected allocations, the budgets for those proposed activities affected by the change will be proportionally increased or decreased to match the actual allocation amounts. CDBG expresses their allocations as a percentage range of overall funding: Housing Rehab (3-5%), Community Livability (15-20%), and Water and Sewer Infrastructure (75-80%). For any unforeseen changes outside of the above scenario, the state's citizen participation plan will be followed for any needed revisions.

2. Summarize the objectives and outcomes identified in the Plan

Also contained in the 2018-19 Annual Action Plan are the specific goals the administering agencies, known collectively as the Consolidated Planning Partners, hope to address in the coming year, as they relate to the five-year Consolidated Plan, and the goal outcome indicators by which the administering agencies will measure performance. The specific goals of the 2015-19 Consolidated Plan are:

1. Create and maintain affordable rental and homeownership stock with the construction of new affordable housing, rehabilitate existing affordable housing, provide down-payment assistance, and provide tenant-based rental assistance to eligible populations.
2. Support homeless facilities to ensure they can continue to meet the needs of Tennessee's homeless population and provide resources to support those who are homeless or at risk of homelessness.
3. Provide resources to preserve affordable housing options for those persons with HIV/AIDS.
4. Provide resources to cities and communities to update and repair water and sewer systems. Also, create the base of infrastructure that will provide for a high quality of life for individuals, productive capacity for communities, and that will support economic development.
5. Provide communities with resources to revitalize public and community infrastructure and assets to improve the livability of communities.
6. Provide resources to cities and communities to support job creation, job training, and other job related opportunities.
7. Deliver community development programs in a manner that provides maximum assistance not only to economically disadvantaged individuals, but also to economically disadvantaged or low-to moderate-income areas of the state.
8. Affirmatively further fair housing by providing training and technical assistance to communities, organizations, realtors, lenders, and other stakeholders. Also provide fair housing counseling, outreach, and education to households, organizations, realtors, lenders, and other stakeholders.

For each of the eight goals, action steps were developed in the five-year Consolidated Plan, designed to address these goals. The action steps and the ways in which each of the programs propose to address the goals are also discussed. The Consolidated Planning Partners have developed planning documents, included in the appendix of the Annual Action Plan, to better link HUD's grant objectives to the State of Tennessee's objectives, action steps, activities, and performance measures.

3. Evaluation of past performance

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

The state is currently implementing the FY 2017-18 Annual Action Plan. Accomplishments for the FY 2017-18 Annual Action Plan will be reported in the FY 2017-18 *Consolidated Annual Performance and Evaluation Report (CAPER)* in September 2018. The FY 2016-17 CAPER reflects the performance and accomplishments with FY 2016-17 program funding. The CDBG, HOME, ESG, and HOPWA programs received a combined allocation of \$44,712,593. Accomplishments during FY 2016-17 include:

- HOPWA – The Tennessee Department of Health (DOH) awarded \$1,017,145 to the seven project sponsors across the state that directly administer the program. HOPWA funds are used to provide assistance in the following five categories: housing information services; housing assistance (short-term rent, mortgage, and utility payment program); supportive services; permanent housing placement; and ongoing housing assessment plans. The HOPWA program reported activity for 685 households in need of HOPWA services.
- CDBG – A total of 82 contracts were awarded to city governments, county governments, and other subrecipients totaling \$32,235,910 through the CDBG program. This amount included the FY 2016-17 award amount plus additional funds that were recaptured, unspent funds from completed projects from previous years, CDBG loan repayment funds from the CDBG Economic Development Loan Program, and a portion of the unexpended CDBG funds. A total of 214,639 low- and moderate-income (LMI) persons were assisted.
- HOME – In total, THDA distributed \$7,372,020 in program funds during FY 2016-17. A total of 149 housing units were assisted with HOME dollars, funded by previous allocations but completed during FY2016-17. Out of the 149 households assisted during the reporting period, 17 were extremely low-income, 54 were considered very low-income, and 52 were considered low-income.
- ESG – A total of \$4,087,518 was expended through the ESG program for this reporting period. There were 49 ESG contracts that were awarded during this reporting period. Total ESG funding during the reporting period assisted 15,773 low-, very low-, and extremely low-income persons. Of the ESG beneficiaries that reported income data, 6,127 were extremely low-income persons.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

Public input will be solicited during the public comment period of March 26 through April 25, 2018. The State of Tennessee will solicit citizen participation through the use of email invitations, newsletters, and postings to state websites, development district websites, and social media (Facebook). Public notices were translated into Spanish, Arabic, Somali, Burmese, Bosnian, Vietnamese, Badini, and Sorani.

Additional accommodations such as translation services into other languages or interpreter services for persons with disabilities are available upon request. Public notices informing communities of the public comment period were also published in the following newspapers:

- Chattanooga Times Free Press – Chattanooga
- The Commercial Appeal – Memphis
- El Crucero de Tennessee – Nashville
- Herald-Citizen – Cookeville
- The Jackson Sun – Jackson
- Johnson City Press- Johnson City
- Knoxville News Sentinel – Knoxville
- La Campana – Franklin
- La Presnsa Latina – Memphis
- The Leaf Chronicle – Clarksville
- State Gazette – Dyersburg
- The Tennessean – Nashville

In addition to publicizing the Annual Action Plan, each program description for THDA-administered programs is discussed and voted on by the TDHA Board of Directors. These meetings are open and available to the public.

PR-05 Lead & Responsible Agencies - 91.300(b)

1. Agency/entity responsible for preparing/administering the Consolidated Plan

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
CDBG Administrator	TENNESSEE	Department of Economic and Community Development
HOPWA Administrator	TENNESSEE	Department of Health
HOME Administrator	TENNESSEE	THDA, Community Programs
ESG Administrator	TENNESSEE	THDA, Community Programs
HTF Administrator	TENNESSEE	THDA, Community Programs

Table 1 – Responsible Agencies

Narrative

While the Tennessee Housing Development Agency has been designated as the lead agency for Tennessee’s Consolidated Planning requirements, all of the administering agencies of the five grant programs participate in the development of the Annual Action Plan and the implementation of their respective programs. The 2018-19 Action Plan represents the cooperation of these agencies in working together to further affordable housing and community development in Tennessee. In addition, the plan is developed in consultation with the citizens of our state. The draft plan is made available for review and public comment, according to the guidelines developed in the five-year Consolidated Plan and our Citizen Participation Plan.

Consolidated Plan Public Contact Information

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AP-10 Consultation - 91.110, 91.300(b); 91.315(l)

Provide a concise summary of the state's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies

All of the above mentioned outreach efforts included staff and representatives from governmental health, mental health, and service agencies. Most specifically, the Department of Health and Mental Health were instrumental in crafting our HIV/AIDS assessment and our lead-based poison prevention approach.

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

THDA administers the Emergency Solutions Grant (ESG) contracts in areas of the state outside the ESG entitlement areas of Chattanooga, Memphis, and Nashville. Therefore, THDA coordinates ESG program implementation with 8 of the 10 Continuum of Care in Tennessee. Because service delivery structure and extent of homelessness differ regionally throughout Tennessee, THDA works with local continua continuously while administering the ESG Program. As part of the ESG application review process, THDA coordinates with each Continuum to receive input on each applicant, including the applicant's participation in meetings and activities of the Continuum. THDA also requires the applicant's participation in the Coordinated Entry process and use of the HMIS of the CoC.

Beginning in the spring of 2018, THDA also is funding the participation of up to three of the ten CoCs in the Built for Zero initiative operated by Community Solutions so that each may develop or further refine their strategies to achieve functional zero of homeless veterans in their Continuum. THDA is a member of numerous consortia that assist low-income households and those who are homeless in Tennessee. THDA coordinates with these groups to help align services regionally. Specific to the Consolidated Plan and Action Plan, in 2015 THDA communicated with these groups through focus groups and presentations at local events to better understand the needs of the homeless population to include in the Consolidated Plan and Action Plan.

Describe consultation with the Continuum(s) of Care that serves the State in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS

As previously mentioned, THDA administers the Emergency Solutions Grant (ESG) contracts in areas of the state outside the ESG entitlement areas of Chattanooga, Memphis, and Nashville. Therefore, THDA coordinates ESG program implementation with 8 of the 10 Continua of Care in Tennessee. THDA regularly attends CoC meetings and works closely with the CoC to administer the ESG program and address service gaps to homeless populations.

THDA meets with CoC's many times officially and unofficially over the year. Over the last year THDA has helped CoC's reorganize and better train interested agencies. Through workshops, trainings, and other communications, THDA requested feedback from the CoCs during the public comment period for the reporting period of this Action Plan.

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Expected Resources

AP-15 Expected Resources – 91.320(c)(1,2)

Introduction

The following table summarizes the anticipated resources, broken down by program type, allocated by the State of Tennessee during year four of the Consolidated Plan's planning period (FY 2015-2019).

NOTE: Annual Allocations are based on the allocation in 2017-18. We are expecting similar allocations for 2018-19 but they will be updated to show the current totals when we receive those allocations. The Total and Expected Amount Available for the Remainder of the ConPlan will also be updated based on the new allocations. Many of the other columns have been updated for

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each program but may include minor changes.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 4				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	24,977,133	308,671.48	1,428,083.08	26,257,497	50,000,000	TNECD receives CDBG funds for the non-entitlement areas of the state. These funds and any program income or recovered funds are used primarily for public facility projects across the state. Program income will be applied to the funding of additional regular round activities. At least \$1,000,000 of recovered funds from prior activities will be held for funding imminent threat projects during the year. At the end of the year excessive balances will be allocated for use in the next program year.
HOME	public - federal	Homeowner rehabilitation; Second mortgage assistance; and the Development of housing for sale to low and moderate income home buyers.	9,582,153	20,671.55	1,238,053.74	11,795,162	20,000,000	THDA receives HOME funds for the cities, counties and profits outside of local participating jurisdictions. The funds and any program income or recovered funds are used to promote the production, preservation and rehabilitation of single family housing for low-income households.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 4				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOPWA	public - federal	Permanent housing in facilities Permanent housing placement Short term or transitional housing facilities STRMU Supportive services TBRA	1,097,514	0	0	1,097,514	3,000,000	TDOH receives HOPWA funds for housing activities that benefit low-income persons living with HIV/AIDS and their families.
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	3,640,860	0	463,000	3,640,860	8,000,000	THDA receives ESG funds to provide the services necessary to help homeless persons or those at risk of being homeless quickly regain stability in permanent housing after experiencing a housing crisis and/or homelessness.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 4				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
Housing Trust Fund	public - federal	Multifamily rental new construction Multifamily rental rehab	3,160,279	0	0	3,963,712	6,000,000	The Housing Trust Fund (HTF) is a new affordable housing production program that will complement existing Federal, state and local efforts to increase and preserve the supply of decent, safe, and sanitary affordable housing for extremely low- and very low-income households, including homeless families.
LIHTC	public - federal	Acquisition Multifamily rental new construction Multifamily rental rehab	150,000,000	0	0	150,000,000	300,000,000	The LIHTC program allocates federal tax credits to developers of low income rental housing. Allocations are made on the front end for 10 years. The dollars reflected above are the 10-year values of the allocations to be made during the ConPlan period.

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Program	Source of Funds	Uses of Funds	Expected Amount Available Year 4				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
Other	public - federal	Acquisition Economic Development Homeowner rehab Housing Public Improvements Other	12,000,000	0	863,725.38	12,000,000	30,000,000	Funding from 2008, 2010 and 2013 disasters were provided to TN, totaling \$137,234,407. TNECD expects to close, or at least be in the process of closing, the 2008 disaster grant (B-08-DI-47-0001) by the end of the FY17-18 leaving no prior year resources for this grant. TNECD is allocating to the remainder of the 2010 disaster grant (B-10-DF-47-0001) funds, approximately \$863,000 to the Stanton Wastewater Reroute project that was funded as part of last year's unexpended fund allocation. The final allocation of B-13-DS-47-0001 funds, in the amount of \$4,610,000 has been obligated, and the activities will be completed and funds disbursed by the September 30, 2019 deadline. TNECD was also awarded \$44,502,374 as a recipient of the CDBG-NDR grant (B-13-DS-47-0002), and plans to have the funds expended by September 30, 2022.
Other	public - federal	Other	450,000	0	0	450,000	1,350,000	Leveraged Ryan White funds.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 4				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
Other	public - federal	Rental Assistance	196,000,000	0	0	196,000,000	628,000,000	The Section 8 Contract Administration Division of THDA administers the Section 8 Contract Administration Program. THDA administers the Section 8 Housing Assistance Payments (HAP) Contracts and is responsible for approving and making the monthly payment to property owners throughout the state. At the end of calendar year 2016, the Division had 393 contracts, representing 33,431 families, and monthly HAPs averaging approximately \$13.7 million per month.
Other	public - state	Homebuyer assistance	700,000	0	0	700,000	1,050,000	THDA requires homebuyer education for one of our home loan programs and encourages it for everyone considering homeownership. The purpose of homebuyer education is not only to assist people with purchasing homes, but also to help them become successful homeowners. THDA provides approved local nonprofit organizations and UT Extension agents with materials to teach first-time homebuyer education classes and hosts certification training for homebuyer education providers. In FY 17-18 THDA will hire three new HUD certified counselors to provide foreclosure prevention counseling and assist with homebuyer education activities.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 4				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
Other	public - state	Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership Short term or transitional housing facilities Transitional housing	8,500,000	0	0	8,500,000	22,500,000	The Tennessee Housing Trust Fund (HTF) funds five programs to address unmet housing needs in Tennessee. The Competitive Grants program targets rental housing needs across the state for low and very low income residents. Other programs address rural housing needs, housing modifications for persons with disabilities, home repair for the elderly and new home construction and purchase for low income Tennesseans. In FY 17-18 THDA will implement the Challenge Grant Program that provides initial seed funding to support the fundraising efforts of nonprofit organizations across Tennessee to implement housing activities that represent unique milestones, are part of a broad community initiative, or are part of a significant expansion of work outside the normal day to day activities of the organization. Selected proposals must generate cash leverage of at least 500% within nine months of THDA's commitment of Challenge Grant resources to the housing initiative.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 4				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
Other	public - state	Other	4,000,000	0	0	4,000,000	8,000,000	CITC - Financial institutions may obtain a credit against the franchise's excise tax liability when qualified loans, investments, grants, or contributions are extended to eligible non-profit organizations, development districts, public housing authorities, or THDA for activities that create or preserve affordable housing, help low-income Tennesseans obtain affordable housing, or activities that help build the capacity of eligible non-profit organizations who provide housing opportunities for low income Tennesseans.
Other	Public - federal	Rental Assistance	31,000,000	0	0	31,000,000	62,000,000	Housing Choice Vouchers

Table 2 - Expected Resources – Priority Table

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

HOME Investment Partnerships Program: For HOME, THDA added a new scoring item that encourages the submission of applications that include match resources eligible under the federal HOME program regulations. Up to 20 points are available for applications that will contribute eligible match resources that will assist the State in meeting its match obligations required by the program. For sub-grantees not supplying match, THDA will continue to provide the required federal match. Although no local match is required from applicants, THDA will count toward its matching requirement any nonfederal project funds that qualify as match under the HOME rule. In the scoring matrix, any project that has leveraged funds will receive additional points. For 2018, CHDO grantees will be required to provide a 25% match.

Emergency Solutions Grant Program (ESG): The ESG program requires that grantees provide a dollar for dollar match for ESG funds. Each grantee

must provide a certification of matching funds. All grantees must supplement their ESG funds with equal amounts of funds or in-kind support from non-ESG sources. Certain other federal grants contain language that may prohibit their being used as a match. Matching funds or in-kind support must be provided after the date of the grant award to the recipient and within the period of the ESG contract with THDA. The recipient may not include funds used to match any previous ESG grant.

Housing Opportunities for Persons with AIDS/HIV (HOPWA): HOPWA does not require a match for their grants.

Housing Trust Fund (HTF): THDA will provide a preference for applications that include the use of non-THDA, federal and non-federal resources towards the development of the housing. THDA will not consider rental assistance provided for the purposes of this category. THDA will award points based on the actual percentage of other non-THDA funds in the project against the total development costs of the project. In order to receive points, written documentation committing the non-THDA funds must be included in the application.

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

The TN CDBG program awards many projects each year that will be completed on publicly-owned property, particularly water and sewer system improvement projects where work is often done at water and wastewater treatment plants or other similar properties.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives – 91.320(c)(3)&(e)

NOTE: Funding will be updated based on the new 2018-19 Allocations. The current sums are from the 2017-18 allocations, although we are expecting similar amounts.

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Creation and preservation of affordable housing	2015	2019	Affordable Housing	Non-Entitlement Statewide Grant Allocation Priority	Fair housing Infrastructure, disinvestment, disaster recovery Limited housing opportunities	CDBG: \$925,600 HOME: \$9,579,153 Housing Trust Fund: \$3,160,279 LIHTC: \$150,000,000 Community Investment Tax Credits: \$4,000,000 Homebuyer Education: \$700,000 Housing Choice Vouchers: \$31,000,000 Section 8 Project Based Contract Administration: \$165,000,000 Tennessee Housing Trust Fund: \$8,500,000	Homeowner Housing Rehabilitated: __10__ Household Housing Unit Rental units constructed: __34__ Household Housing Unit Rental units rehabilitated: __15__ Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
2	Preserve homeless facilities & supportive services	2015	2019	Homeless	Non-Entitlement Statewide Grant Allocation Priority	Limited housing opportunities	ESG: \$3,426,712	Tenant-based rental assistance / Rapid Rehousing: _3,047_ Households Assisted Homeless Person Overnight Shelter: _6,351_ Persons Assisted Overnight/Emergency Shelter/Transitional Housing Beds added: _0_ Beds Homelessness Prevention: _1,358_ Persons Assisted
3	Preserve housing for persons with AIDS/HIV	2015	2019	Affordable Housing Non-Homeless Special Needs	Non-Entitlement Statewide Grant Allocation Priority	Fair housing Limited housing opportunities Limited non-housing supportive services	HOPWA: \$1,096,514	Tenant-based rental assistance / Rapid Rehousing: _7_ Households Assisted Overnight/Emergency Shelter/Transitional Housing Beds added: _4_ Beds Jobs created/retained: _4_ Jobs Housing for People with HIV/AIDS added: _320_ Household Housing Unit
4	Physical infrastructure development	2015	2019	Non-Housing Community Development	Non-Entitlement Statewide Grant Allocation Priority	Fair housing Infrastructure, disinvestment, disaster recovery	CDBG: \$20,500,000 CDBG-DR: \$863,725.38	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 275,000___ Persons Assisted
5	Revitalize disinvested areas & improve livability	2015	2019	Non-Housing Community Development	Non-Entitlement Statewide Grant Allocation Priority	Infrastructure, disinvestment, disaster recovery	CDBG: \$4,000,000 CDBG-DR: \$0	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: _150,000_ Persons Assisted
6	TA, Job/Business Development, Administration	2015	2019	Non-Housing Community Development	Non-Entitlement Statewide Grant Allocation Priority	Infrastructure, disinvestment, disaster recovery Limited non-housing supportive services	CDBG: \$606,154.56	

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
7	Target economic distress	2015	2019	Non-Housing Community Development	Non-Entitlement Statewide Grant Allocation Priority	Infrastructure, disinvestment, disaster recovery	CDBG: \$700,000	Businesses assisted: _30__Businesses Assisted
8	Fair housing	2015	2019	Affordable Housing Public Housing Homeless	Non-Entitlement Statewide Grant Allocation Priority	Fair housing Limited housing opportunities	CDBG: \$5,000 HOPWA: \$0 HOME: \$3,000 Homebuyer Education: \$275,000	Other: 1500 Other

Table 3 – Goals Summary

Goal Descriptions

1	Goal Name	Creation and preservation of affordable housing
	Goal Description	Create and maintain affordable rental and homeownership stock with the construction of new affordable housing, rehabilitate existing affordable housing, provide down payment assistance and provide tenant-based rental assistance to eligible populations. CDBG Annual Allocation: \$900,000 CDBG Prior Year: \$25,600
2	Goal Name	Preserve homeless facilities & supportive services
	Goal Description	Preserve homeless facilities to ensure they can continue to meet the needs of Tennessee's homeless population and provide resources to support those who are homeless or at risk of homelessness.

3	Goal Name	Preserve housing for persons with AIDS/HIV
	Goal Description	<p>The State of TN HOPWA program is administered by the Tennessee Department of Health who provides four major programs to preserve housing for persons with HIV/AIDS. In FY 2018-19, the State of TN HOPWA program will assist an estimated 300 households to access or maintain housing. In addition, the State's goal is to improve access to care and support, including the following supportive services: mental health, transportation, nutritional, housing information system, and non-case management services. HOPWA has four major programs through which they provide services:</p> <ul style="list-style-type: none"> - Short term rent, mortgage and utility assistance (STRMU) provides short term assistance to maintain a stable living environment for households who are experiencing a financial crisis and the potential loss of their housing arrangement. - Tenant Based Rental Assistance (TBRA) provides assistance to eligible clients and their beneficiaries until they are able to secure affordable and stable housing. - Supportive Services include dental, nutrition, transportation, case management, housing, alcohol and drug abuse services, advocacy, child care, employment assistance, life skills, emergency assistance for payment of utility bills, and other services. - The Permanent Housing Placement program helps clients with costs related to application fees, credit checks, and reasonable security deposits. <p>Housing Information System- Assisting clients in finding housing, brochures, fair housing info and landlord and tenant act info./ etc.</p> <p>In FY 2018-19, the State of TN HOPWA program will assist 20 households with FBH-Transitional/Short-term Facilities to house clients in emergency shelters using the Hotel/Motel Voucher. In addition to the above aforementioned HOPWA services, the State of TN HOPWA program will begin to offer Housing Information Systems which allows staff to compile a resource database to assist eligible households as well as clients who are not eligible due to living in section 8 housing but need additional housing resources, fair housing information, or other resources. When applicable, the 7 regional HOPWA project sponsors (Chattanooga CARES, Columbia CARES, Nashville CARES, Positively Living, Frontier- Hope of Tennessee, WTLS-West Tennessee Legal Services, UCHRA-Upper Cumberland Human Resource Agency) will leverage resources using Ryan White Part B (payer of last resort) and other federal, state, local and private and in-kind resources for the provision of HIV/AIDS housing services to HOPWA clients.</p>

4	Goal Name	Physical infrastructure development
	Goal Description	<p>Provide resources to cities and communities to update and repair water and sewer systems. Also, create the base of infrastructure that will provide for a high quality of life for individuals, productive capacity for communities, and that will support economic development.</p> <p>Program Income (PI) will be used for Urgent Need activities</p> <p>CDBG Annual Allocation: \$19,500,000 CDBG-DR: \$0 CDBG Program Income: \$308,671.48 CDBG Prior Year: \$691,328.52</p>
5	Goal Name	Revitalize disinvested areas & improve livability
	Goal Description	<p>Provide communities with resources to revitalize public and community infrastructure and assets to improve the livability of communities.</p> <p>CDBG Annual Allocation: \$3,495,000 CDBG-DR: \$0 CDBG Program Income: \$0 CDBG Prior Year: \$505,000</p>
6	Goal Name	TA, Job/Business Development, Administration
	Goal Description	<p>Provide resources to cities and communities to support job creation, job training, and other job related opportunities.</p> <p>CDBG Annual Allocation: \$600,000 (Administration) CDBG Program Income: \$6,154.56</p>
7	Goal Name	Target economic distress
	Goal Description	<p>Deliver community development programs in a manner that provides maximum assistance not only to economically disadvantaged individuals, but also to economically disadvantaged or low- to moderate-income areas of the state.</p> <p>CDBG Annual Allocation: \$500,000 CDBG Prior Year: \$200,000</p>

8	Goal Name	Fair housing
	Goal Description	Affirmatively furthering fair housing by providing training and technical assistance to communities, organizations, realtors, lenders and other stakeholders. Also provide fair housing counseling, outreach, and education to households, organizations, realtors, lenders and other stakeholders.

Table 4 – Goal Descriptions

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AP-25 Allocation Priorities – 91.320(d)

Introduction

Tennessee will address the strategic housing and community needs as articulated in the Consolidated Plan through the four Consolidated Planning grants and other resources that the state and HUD provide to address this need.

Funding Allocation Priorities

	Creation and preservation of affordable housing (%)	Preserve homeless facilities & supportive services (%)	Preserve housing for persons with AIDS/HIV (%)	Physical infrastructure development (%)	Revitalize disinvested areas & improve livability (%)	TA, Job/Business Development, Administration (%)	Target economic distress (%)	Fair housing (%)	Total (%)
CDBG	4	0	0	75	17	2	2	0	100
HOME	99	0	0	0	0	0	0	1	100
HOPWA	0	0	100	0	0	0	0	0	100
ESG	0	99	0	0	0	0	0	1	100
Housing Trust Fund	100	0	0	0	0	0	0	0	100
LIHTC	100	0	0	0	0	0	0	0	100
Other CDBG-DR	0	0	0	22	78	0	0	0	100
Other Community Investment Tax Credits	100	0	0	0	0	0	0	0	100
Other Homebuyer Education	50	0	0	0	0	0	0	50	100

Other Housing Choice Vouchers	100	0	0	0	0	0	0	0	100
Other Leveraged Funds Ryan White	0	0	100	0	0	0	0	0	100
Other Section 8 Project Based Contract Administration	100	0	0	0	0	0	0	0	100
Other Tennessee Housing Trust Fund	100	0	0	0	0	0	0	0	100

Table 5 – Funding Allocation Priorities

Reason for Allocation Priorities

Affordable housing and community development are the central needs addressed by the Consolidated Plan. The allocation priorities reflect the deep need for affordable housing in Tennessee both with the HUD resources provided to the state and other state resources dedicated to improving affordability and quality in housing for extremely low-, very low-, low- and moderate-income Tennesseans. As described in the Needs Assessment, Market Analysis, and Housing & Community Needs Survey responses, there is a continuing need for additional affordable housing opportunities across the state.

The majority of Tennessee’s housing stock, 35% owner-occupied and 40% renter-occupied, was built between 1950 and 1979. Furthermore, 10.3% of the total units were built prior to 1950 (ACS 5yr, 2015). Based on the age of most of the housing stock alone, there is a need for rehabilitation of both rental and ownership units. Further, feedback from stakeholders collected in the Housing & Community Needs Survey states a general need for owner- and rental-occupied rehabilitation. According to the Housing Affordability table in section MA-15, there were 187,325 renter households with less than 30 percent of AMI in Tennessee from 2007-2011. During the same time period, there were 70,610 rental units affordable to households in this income level (this does not include public housing, HVC, or other subsidized housing). In addition to the general needs for affordable housing, there is a high need for the development, rehabilitation, and provision of associated housing services and facilities for homeless and non-homeless special populations, especially persons with disabilities and rural homeless. As noted in the Needs Assessment of the Consolidated Plan, there are needs for accessible units, homeless facilities, and housing assistance to adequately serve these

populations.

Additionally, based on stakeholder and citizen feedback, there is a general need for infrastructure, community facilities, and economic development activities through business assistance and development programs and downtown revitalizations. Many communities in Tennessee have delayed improvements and maintenance to infrastructure and community facilities, heightening the need for these activities. Many communities in Tennessee are still recovering from the economic recession and recent natural disasters, resulting in a need for continued economic development and revitalization activities.

HOPWA: the proposed distribution of funds address all of our priority need housing areas to include but not limited to preserving affordable housing, provide suitable living environments, permanent housing placement- PHP, short term rent, mortgage and utility assistance STRMU, tenant-based rental assistance –TBRA, Supportive Services- SS to the extent that it is driven by applicant demand of these activities and federal and State statutory or regulatory requirements for the use of these funds to prevent and or alleviate homelessness among people living with HIV/AIDS.

Disaster Recovery Needs: The State will continue the use of the Disaster Recovery funds to rebuild, reestablish, and improve communities that were impacted by presidentially declared disasters in 2008, 2010, and 2011. The State will also utilize funding awarded as part of the National Disaster Resilience Competition to develop and build a mindset of using HUD and other leveraged funds to become more resilient to natural and economic disasters.

How will the proposed distribution of funds will address the priority needs and specific objectives described in the Consolidated Plan?

Each of the five Consolidated Planning Programs has their own method of distribution. Each method is intended to ensure that all non-entitlement areas can compete for these funds. Program specific need-based preferences can be found in these methods of distribution.

One recent programmatic decision warrants additional mention. In 2014, THDA amended its HOME Program Description to restrict eligible activities to homeowner rehabilitation and homebuyer down payment assistance in its Urban/Rural allocations and the development of units for homeownership by Community Housing Development Organizations (CHDOs) in its CHDO set-aside. All rental development previously eligible under the state’s HOME Program was moved to THDA’s Housing Trust Fund Competitive Grants and will now also be the Housing Trust Fund. There is a deep need in all of these types of housing efforts and the provision of state funds in the rental housing sector is a reflection of our

commitment to address each of these needs.

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AP-30 Methods of Distribution – 91.320(d)&(k)

Introduction

Each of the five Consolidated Planning Programs has their own method of distribution. Each method is intended to ensure that all eligible areas can compete for these funds and statewide for the Housing Trust Fund. Program specific need-based preferences can be found in these methods of distribution.

Distribution Methods

Table 6 - Distribution Methods by State Program

1	State Program Name:	CDBG - Regular Round
	Funding Sources:	CDBG
	Describe the state program addressed by the Method of Distribution.	The State of Tennessee holds an annual round of applications open to all non-entitlement jurisdictions that do not have a grant open at the time of application. A public meeting was held in September of 2017 to discuss the application and award process of the 2018 grants. All local officials from eligible non-entitlement jurisdictions, along with administrators and engineers who frequently work with CDBG projects, were invited to participate and offer comments. More the 50 people were in attendance.

<p>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</p>	<p>All applications must meet 4 criteria, before being scored:</p> <ol style="list-style-type: none"> 1. Meet a National Objective 2. Be an eligible activity 3. Be a non-entitlement jurisdiction 4. Be an eligible community development objective <ul style="list-style-type: none"> • Physical Infrastructure Development - to create the base of infrastructure that will provide for a high quality of life for individuals and productive capacity for communities. • Community Livability Development - to develop an improved community livability by enhancing emergency and protective services or making improvements to the physical environment. Target Economic Distress - to deliver community development programs in a manner that provides maximum assistance not only to economically disadvantaged individuals, but also to economically disadvantaged areas of the state. • Maximize Grantees - to use the resources available to the state in a manner which will maximize the number of grantees and, therefore, beneficiaries of the programs. <p>For State Fiscal Year 2018-19 applicants may apply for funding from one of five different program categories: Economic Development, Water/Sewer, Housing Rehabilitation, Community Livability and Commercial Façade Improvements. All Urgent Need/Imminent Threat projects must also fall into one of the program categories.</p> <p>Applications are scored based on the following criteria:</p> <ol style="list-style-type: none"> 1. Community Need <ul style="list-style-type: none"> • Latest annual county unemployment rate. • Target area/Census per capita income • 2006-2015 average county unemployment rate • 2014 per capita income
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	<ol style="list-style-type: none"> 2. Project Need: Project need points measure the degree to which there is a need for the project (no existing facilities or existing facilities are inadequate). Due to the different types of projects, project need points are structured differently based on project type. 3. Project Feasibility: Project Feasibility is not scored and is instead a threshold for water/sewer projects. The feasibility of Community Livability projects are based on 1) quality of design, 2) cost effectiveness, 3) Alternatives, 4) Adequacy of operating budget, 5) Quality of documentation that the project will solve the problem. Housing feasibility is based on the assessment of the amount of work needed as proposed and the magnitude of the problems. 4. Project Impact: Project Impact is scored on the CDBG cost per person and the CDBG cost per LMI person (based on county LMI percentage) for all applications. The rate factor is also included for water/sewer applications. 5. Project Essentialness: Project essentialness points apply only to community livability projects and are designed to assess the degree to which the project is essential for the maintenance of safe and tolerable living conditions. Scores of three ECD reviewers will be averaged. 6. Economic Development: Up to 10 additional points are available to applications that exhibit economic development impacts as a result of the project.
<p>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</p>	<p>All CDBG manuals and applications materials are available on the ECD website and by request.</p>

<p>Describe how resources will be allocated among funding categories.</p>	<table border="0"> <tr> <td>Water and Sewer Projects</td> <td>\$20,500,000</td> </tr> <tr> <td>Community Livability Projects</td> <td>\$4,000,000</td> </tr> <tr> <td>Housing Projects</td> <td>\$925,600</td> </tr> <tr> <td>Commercial Façade Projects</td> <td>\$700,000</td> </tr> <tr> <td>Administration and Tech. Assistance</td> <td>\$606,154.56</td> </tr> <tr> <td>Total</td> <td>\$26,736,754.56</td> </tr> </table> <p>Program income (\$308,671.48) will be applied to the funding of additional regular round activities. At least \$1,000,000 of recovered funds from prior activities will be held for funding imminent threat projects during the year. At the end of the year excessive balances will be allocated for use in the next program year.</p>	Water and Sewer Projects	\$20,500,000	Community Livability Projects	\$4,000,000	Housing Projects	\$925,600	Commercial Façade Projects	\$700,000	Administration and Tech. Assistance	\$606,154.56	Total	\$26,736,754.56
Water and Sewer Projects	\$20,500,000												
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Housing Projects	\$925,600												
Commercial Façade Projects	\$700,000												
Administration and Tech. Assistance	\$606,154.56												
Total	\$26,736,754.56												
<p>Describe threshold factors and grant size limits.</p>	<p>Community Livability grants have a max threshold request of \$300,000. Water, sewer, and housing have thresholds of \$500,000. Commercial Façade grants have a threshold of \$100,000. Community Livability projects have the potential of \$15,000 bonus and water/sewer \$25,000 bonus based on if the applicant is located in a ThreeStar county.</p>												
<p>What are the outcome measures expected as a result of the method of distribution?</p>	<p>Number of projects expected to be completed under each of the activity descriptions based on prior grant years. Additionally, the CDBG program tracks each project upon close as meeting on the following outcome categories:</p> <ul style="list-style-type: none"> • Accessibility/Availability • Affordability • Sustainability 												
<p>State Program Name:</p>	<p>ESG - Set Aside</p>												

2	Funding Sources:	ESG
	Describe the state program addressed by the Method of Distribution.	<p>The ESG Program is designed to identify sheltered and unsheltered homeless persons, as well as those at risk of homelessness, and provide the services necessary to help those persons to quickly regain stability in permanent housing after experiencing a housing crisis and/or homelessness. THDA will spend up to 7.5% of its ESG allocation for administrative and planning expenses. THDA will share the amount available for administration with selected small city entitlement communities that do not receive their own ESG allocation from HUD as well as other successful local government applicants. Non-profit agencies are not eligible to receive funds for administration.</p> <p>THDA will allocate \$150,000 each to the cities of Clarksville, Johnson City, Knoxville, and Murfreesboro. Each of these jurisdictions have either recently lost their direct ESG allocation from HUD or are the location of a major entity serving veterans, a key priority under the Tennessee State Plan to End Homelessness. Each program will operate its ESG program in accordance with its approved Consolidated Plan. Eligible activities include street outreach, shelter activities, homeless prevention, rapid re-housing, Homeless Management Information Systems (HMIS) and administration activities.</p>
	Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	<p>Agencies applying for ESG funding must include in their application documentation that is supported by data showing: 1) need for the program; 2) evidence of homelessness or at-risk of homelessness population within the community; 3) a plan that summarizes how funds will be used to address the unmet needs of their community; and 4) evidence that the applicant has collaborated with the local Continuum of Care (CoC) and that activities selected will help the CoC to meet its goals to address and end homelessness.</p> <p>For complete criteria, please consult the ESG Program Description and Policies and Procedures Manual at http://thda.org/business-partners/esg</p>

<p>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</p>	<p>Non-profits compete in the competitive round of ESG funds (see below). However, local government recipients may distribute all or a part of their ESG funds to eligible, private 501(c)(3) non-profit organizations for allowable ESG activities.</p>
<p>Describe how resources will be allocated among funding categories.</p>	<p>The funding categories within ESG are: Street Outreach; Emergency Shelter; Prevention; Rapid Re-housing; and Data Collection.</p> <p>Expenditure limits of combined Street Outreach and Emergency Shelters cannot exceed 60% of the maximum grant of \$150,000.</p>
<p>Describe threshold factors and grant size limits.</p>	<p>Threshold criteria includes: submission of a complete application; proposal of an eligible activity; proposal of a project that in the opinion of THDA is physically, financially and administratively feasible; proposal of a project that meets the requirements of 24 CFR Part 576 and 91, as amended.</p> <p>An applicant must apply for at least \$35,000 and may apply for a maximum of \$150,000 in ESG funding.</p>

	<p>What are the outcome measures expected as a result of the method of distribution?</p>	<p>The Tennessee ESG Policies and Procedures Manual instructs grantees to adopt performance standards consistent with HUD and THDA program requirements. Examples of outcome measures expected are: reducing the average length of time a person is homeless; reducing returns to homelessness; improving program coverage; reducing the number of homeless individuals and families; reducing the number of chronically homeless individuals and families; improving employment rate and income amounts of program participants; reducing first time homelessness; preventing homelessness and achieving independent living in permanent housing for families and youth defined as homeless under other Federal programs.</p> <p>Although THDA understands many sub-recipients have chosen to provide one-time emergency rent or utility assistance to prevent homelessness, sub-recipients receiving ESG funds should use all available resources that will ensure the ongoing housing stability of program participants.</p>
3	<p>State Program Name:</p>	<p>ESG Competitive Grants</p>
	<p>Funding Sources:</p>	<p>ESG</p>
	<p>Describe the state program addressed by the Method of Distribution.</p>	<p>The ESG Program is designed to identify sheltered and unsheltered homeless persons, as well as those at risk of homelessness, and provide the services necessary to help those persons to quickly regain stability in permanent housing after experiencing a housing crisis and/or homelessness.</p> <p>THDA will allocate \$150,000 each to the cities of Clarksville, Johnson City, Knoxville, and Murfreesboro in a set-aside. 7.5% of the ESG funding is made available for the administration of activities by local governments and THDA. The remaining ESG funds will be allocated to eligible applicants in a competitive grant application process.</p>

<p>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</p>	<p>ESG applicants are scored on the following sets of criteria, and given scoring points accordingly: PROGRAM DESIGN (up to 25 points); APPLICANT CAPACITY (up to 25 points); FISCAL INFORMATION (up to 25 points); PERFORMANCE (up to 15 points); COORDINATION WITH COC PRIORITIES (up to 5 points); and HOUSING FIRST MODEL (up to 5 points).</p> <p>For complete criteria, please consult the ESG Program Description and Policies and Procedures Manual at http://thda.org/business-partners/esg</p>
<p>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</p>	<p>Non-profits compete in the competitive round of ESG funds. Additionally, local government recipients may distribute all or a part of their ESG funds to eligible, private 501(c)(3) non-profit organizations for allowable ESG activities. Once a year, THDA hosts grantee workshops three locations in state, website, notify CoC lead agencies to distribute that include community and faith based organization. Non-profit organizations are eligible to receive funds only if such funding is approved by the local government jurisdiction where programs are based.</p> <p>Non-profits must be an eligible non-profit agency as defined in the ESG Program Description.</p>
<p>Describe how resources will be allocated among funding categories.</p>	<p>The funding categories within ESG are: Street Outreach; Emergency Shelter; Prevention; Rapid Re-housing; and Data Collection.</p> <p>Expenditure limits of combined Street Outreach and Emergency Shelters cannot exceed 60% of the entire ESG allocation. THDA reserves the right to adjust applicants' budgets, if needed, to remain within this requirement.</p>

	<p>Describe threshold factors and grant size limits.</p>	<p>Threshold criteria includes: submission of a complete application; proposal of an eligible activity; proposal of a project that meets the requirements of 24 CFR Part 576 and 91, as amended; Programs with established written ESG Standards, Habitability Standards, and Confidentiality and Privacy Policies; and compliance with and participation in the applicable Continuum of Care, including its Coordinated Entry system.</p> <p>Nonprofit applicants must also upload required organizational documentation through THDA’s Participant Information Management System (PIMS).</p> <p>An applicant must apply for at least \$35,000 and may apply for a maximum of \$150,000 in ESG funding.</p>
	<p>What are the outcome measures expected as a result of the method of distribution?</p>	<p>The Tennessee ESG Policies and Procedures Manual instructs grantees to adopt performance standards consistent with HUD and THDA program requirements. Examples of outcome measures expected are: reducing the average length of time a person is homeless; reducing returns to homelessness; improving program coverage; reducing the number of homeless individuals and families; reducing the number of chronically homeless individuals and families; improving employment rate and income amounts of program participants; reducing first time homelessness; preventing homelessness and achieving independent living in permanent housing for families and youth defined as homeless under other Federal programs.</p>
<p>4</p>	<p>State Program Name:</p>	<p>HOME - CHDO Round</p>
	<p>Funding Sources:</p>	<p>HOME</p>

<p>Describe the state program addressed by the Method of Distribution.</p>	<p>Activities under the HOME Program must address the housing needs of low-income households. Eligible activities include: <i>Housing Rehabilitation</i> - the use of HOME funds will be limited to the rehabilitation or reconstruction of existing housing units A maximum investment per unit will be limited by both (1) the federal maximum HOME subsidy limit as adjusted by the number of bedrooms per unit and (2) the after rehabilitation value of the unit permitted under the federal regulations By regulation, the after rehabilitation value may not exceed 95% of the median purchase price for the area. <i>Homeownership programs</i> - are restricted to a soft second mortgage necessary to qualify the household for permanent financing; <i>CHDO Operating Expenses, Developer's Fees and CHDO Proceeds</i>; and <i>Project Soft Costs</i> - in planning their programs, applicants may include the costs for progress review inspections and work write-ups as a project-related soft cost. There is a limit to these costs of 7% of the hard costs of the rehabilitation or construction, not to exceed \$2,500 or be less than \$500.</p>
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<p>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</p>	<ol style="list-style-type: none"> 1. CAPABILITY Up to 50 points: The proposed project demonstrates exceptional planning and readiness and the organization demonstrates sufficient capacity beyond threshold. 2. NEED Up to 40 points: THDA has calculated need factors using housing statistics for counties. Factors are based on percentages rather than absolute numbers. For homeowner projects, the need factors used are percentage of owner households that are low income; the percentage of low income owner households with cost burden or other problems; and the percent of affordable owner units built before 1960. For multi-county projects, the need score is calculated proportionately according to the number of units proposed for each county. 3. NOT PROPORTIONALLY SERVED Up to 40 points: THDA shall award up to 50 additional points to applications submitted from areas where the amount of THDA and HOME funding is below the state average. The formula for awarding these points is based on the percentage of 1992-2013 HOME dollars awarded in each county. For multi-county projects, this score is calculated proportionately according to the number of units in each county. 4. DISASTER AREAS 10 points: THDA shall award 10 additional points to applications for projects located in counties that have been declared a presidential disaster area under the Robert T. Stafford Disaster Relief and Emergency Assistance Act in the year prior to the application due date. 5. LEVERAGE Up to 10 points: THDA shall award up to 10 additional points to applications that include the use of funds from other sources. THDA will award point in this category based on the actual percentage of other funds in the project. Leveraged funds counted in one program year do not qualify again as leverage in subsequent years. In order to receive point, there must be written documentation for the leveraged funds in the application. 6. ENERGY CONSERVATION/UNIVERSAL DESIGN: For acquisition/rehabilitation and sale type homeownership projects, THDA shall award up to 10 points to applications that, to the extent feasible, include at least three energy conservation measures beyond that required by THDA’s Design Standards for Rehabilitation in the rehabilitation of each unit. . b. For new construction homeownership projects, THDA shall award up to 10 points to applications that agree to construct each single family unit in
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	<p>accordance with the following standards beyond that which is required by THDA's Design Standards for New Construction.</p> <p>Applications must receive a minimum threshold score equal to 50% of the total points available under the applicable scoring matrix.</p>
<p>Describe how resources will be allocated among funding categories.</p>	<p>CHDO Set-aside. Fifteen percent (18%) of 2018 HOME allocation will be reserved for eligible applications from CHDOs, including CHDOs located in Local PJs. The THDA HOME funding to successful CHDO applicants in the Local PJs will be reduced by the amount of funding the CHDO receives from the Local PJs to keep within the \$500,000 maximum grant.</p> <p>Beginning with the 2015 HOME allocation, HUD no longer considers a PJ as meeting its 24-month CHDO commitment through a cumulative total of CHDO commitments since 1992, and each grant year must meet its own 24-month commitment deadline. In addition, the execution of a HOME Working Agreement and the establishment of a CHDO sub-grant in IDIS is insufficient to meet this requirement. Thus, a successful CHDO that receives an allocation of 2018 CHDO funds, must commit those funds to specific units no later than June 30, 2020. Any 2017 HOME funds awarded to an organization must be committed to specific units no later than June 30, 2019. HUD will recapture any 2017 CHDO funds not committed to specific CHDO activities by June 30, 2019 and will recapture any 2018 CHDO funds not committed to specific CHDO activities by June 30, 2020. CHDO applicants need to be aware of these dates and have a pipeline of eligible home buyers so they can begin their projects as soon as the environmental reviews are completed. If in the opinion of THDA, the applications submitted do not contain viable proposals or are from a CHDO that lacks the organizational potential to comply with all HOME affordability requirements, THDA may choose not to award any or all of the funds set-aside for CHDOs in the current application round.</p> <p>THDA will not make any funding awards for units in a jurisdiction where the unit cannot be inspected by a state certified building inspector or by a provider as permitted under State law.</p>

	Describe threshold factors and grant size limits.	An applicant must apply for at least \$100,000 and may apply for a maximum HOME grant of \$500,000. There is a \$750,000 limit on the amount of HOME funds that can be awarded in any one county. The THDA HOME funding to successful CHDO applicants in the Local PJs will be reduced by the amount of funding the CHDO receives from the Local PJs to keep within the \$500,000 maximum grant.
	What are the outcome measures expected as a result of the method of distribution?	The expected outcome measure is that the activities under the HOME Program effectively address the housing needs of low-income households.
5	State Program Name:	HOME Program
	Funding Sources:	HOME
	Describe the state program addressed by the Method of Distribution.	Activities under the HOME Program must address the housing needs of low-income households. Eligible activities include: <i>Housing Rehabilitation</i> - the use of HOME funds will be limited to the rehabilitation or reconstruction of existing housing units. A maximum investment per unit will be limited by both (1) the federal maximum HOME subsidy limit as adjusted by the number of bedrooms per unit and (2) the after rehabilitation value of the unit permitted under the federal regulations. By regulation, the after rehabilitation value may not exceed 95% of the median purchase price for the area. <i>Homeownership programs</i> - are restricted to a soft second mortgage necessary to qualify the household for permanent financing.

<p>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</p>	<ol style="list-style-type: none"> 1. PROGRAM DESIGN Up to 50 points: The proposed program demonstrates exceptional planning, readiness and administrative capability. All necessary components to accomplish the project have been identified in the application 2. NEED Up to 40 points: THDA has calculated need factors using housing statistics for counties. Factors are based on percentages rather than absolute numbers. For homeowner projects, the need factors used are the percentage of owner households that are low income; the percentage of owner households with cost burden; the percentage of affordable owner units built before 1960; the percentage of homes lacking complete kitchen facilities; the percentage of homes lacking complete plumbing facilities; and the percentage of food stamp recipient households in the county. For multi-county projects, the need score is calculated proportionately according to the number of units proposed for each county 3. NOT PROPORTIONALLY SERVED Up to 40 points: THDA shall award up to 50 additional points to applications submitted from areas where the amount of prior THDA and HOME funding is below the state average. The formula for awarding these points is based on the percentage of HOME dollars awarded in each county during the previous 10 year period. 4. DISASTER AREAS : 10 points THDA shall award 10 additional points to applications for projects located in counties that have been declared a presidential disaster area under the Robert T. Stafford Disaster Relief and Emergency Assistance Act in the year prior to the application due date. 5. LEVERAGE Up to 10 points: THDA shall award up to 10 additional points to applications that include the use of funds from other sources. THDA will award points in this category based on the actual percentage of other funds in the project. Leveraged funds counted in one program year do not qualify again as leverage in subsequent years. In order to receive points, there must be written documentation of the leveraged funds in the application. 6. MATCH Up to 20 points: THDA shall award up to 20 points to applications that include a committed contribution of eligible match resources towards the project implementation. A commitment of eligible match contribution from an external source must be documented in the application from the source providing the contribution. To determine the points awarded,
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		<p>THDA will not round the percentage calculated. For more details about points, please refer to the HOME Program Description in the Appendix.</p> <p>7. ENERGY CONSERVATION Up to 10 points: THDA shall award up to 5 additional points to applications for rehabilitation that include an independent energy audit and, to the extent feasible, incorporate the recommendations of the audit report in the rehabilitation work write-up.</p> <p>8. TENNESSEE GROWTH POLICY ACT 10 points: TCA Section 6-58-109(c) requires THDA to award 5 points on a 100 point scale or a comparable percentage on a different point scale to municipalities or counties with approved growth plans when the local communities apply for HOME funds. Applications from counties not subject to the Tennessee Growth Policy Act will also receive these points.</p> <p>Applications must receive a minimum threshold score equal to 50% of the total points available under the applicable scoring matrix.</p>
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<p>Describe how resources will be allocated among funding categories.</p>	<p>HOME funds committed to the State of Tennessee, through THDA, will be allocated as provided in the State of Tennessee's Consolidated Plan, as amended. The amount of the 2018 HOME allocation is unknown until there is an approved federal budget; however, THDA anticipates receipt of an amount equivalent to the amount received in FY 2017, approximately \$9,500,000. Additionally, THDA has approximately \$1,800,000 in funds left over from its 2017 Urban/Rural Matrix competition that will be made available for the 2018 HOME Program. Finally, THDA anticipates the availability of approximately \$223,000 in its 2017 HOME allocation set-aside available to CHDOs that will be made available under the CHDO Matrix. THDA will spend up to ten percent (10%) of its 2018 HOME allocation for administrative and planning expenses (four percent (4%) of these funds for its own administrative expenses and the remaining six percent (6%) is available to pay the administrative costs of local governments and non-CHDO non-profit grant recipients). The balance of THDA's FY 2018 HOME allocation, not including the 10% for administration CHDO set-aside and the 5% for CHDO operating expenses, will be divided as follows:</p> <p>Urban/Rural Allocation. Sixty seven percent (67%) of the 2017 and 2018 HOME funds available will be allocated for eligible projects in Urban and Rural areas of the State. The urban areas include the following counties: Anderson, Blount, Bradley, Carter, Coffee, Dyer, Gibson, Hamilton, Hamblen, Haywood, Loudon, Madison, Maury, Montgomery, Putnam, Roane, Rutherford, Sumner, Unicoi, Williamson and Wilson. All other counties are considered Rural. The urban allocation is 45% of the remaining 70% of the funding, and the rural allocation is 55%. The percentages are based on the low-income population in the designated urban and rural counties. However, the urban areas do not include the low income populations of the local participating jurisdictions of Chattanooga, Clarksville, Jackson, Knox County, Knoxville, Memphis, Metropolitan Nashville-Davidson County, Shelby County, Sullivan County, and Washington County, excluding the Town of Jonesborough. THDA will score, rank and fund urban and rural applications separately. THDA may re-allocate funding between the Urban and Rural matrices should an insufficient number of applications receive the minimum threshold score necessary to award all funds allocated under either of the respective matrices. To be considered for funding, an application must receive a minimum threshold score of 95, an amount equal to 50% of the total points available under the urban or rural matrices. All applications will be ranked in descending order from highest to lowest score and HOME funds will be awarded until all funds are awarded or until the lowest scoring application that meets the threshold score is funded. There will be an urban and a rural matrix and the applicants will be scored,</p>
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		<p>ranked and Applications that do not meet the threshold score will not be considered for funding. There is a \$750,000 maximum grant per county. Grants to successful applicants in the same county will be reduced proportionately should there be multiple successful applicants from the same county with a minimum grant of \$250,000, however, the THDA Board of Directors may award less than \$250,000 should there be more than three successful applicants from the same county.</p> <p>HOME awards will be in the form of a grant. Grantees will be required to repay any HOME funds expended on projects that are not completed and ready for occupancy within 3 years of the date the Written Agreement is executed between the Grantee and THDA. Grantees may also be required to repay HOME funds as described in the Working Agreement.</p> <p>THDA will not make any funding awards for units in a jurisdiction where the unit cannot be inspected by a state certified building inspector or by a provider as permitted under State law.</p>
	Describe threshold factors and grant size limits.	An applicant must apply for at least \$100,000 and may apply for a maximum HOME grant of \$500,000. There is a \$750,000 limit on the amount of HOME funds that can be awarded in any one county.
	What are the outcome measures expected as a result of the method of distribution?	The outcome measure is that the activities under the HOME Program effectively address the housing needs of low-income households.
6	State Program Name:	HOPWA
	Funding Sources:	HOPWA

<p>Describe the state program addressed by the Method of Distribution.</p>	<p>The State is divided into seven (7) HOPWA regions (East Tennessee, North East Tennessee, Upper Cumberland, Mid Cumberland, Mid Cumberland, South Central Tennessee, West Tennessee and South East Tennessee). For FY 2016-17, the HOPWA allocation will be distributed through a formula process based on the reported HIV and AIDS case data provided by CDC. And further adjusted base on the seven (7) State of TN HOPWA Regions listed below for FY 2016-2017:</p> <ul style="list-style-type: none"> • East Tennessee (Positively Living) - \$296,500 • North East Tennessee (Frontier Health – HOPE for TN) - \$118,000 • Upper Cumberland (UCHRA) - \$72,200 • Mid Cumberland (Nashville CARES) - \$83,200 • South Central Tennessee (Columbia CARES) - \$111,100 • West Tennessee (WTLS) - \$155,500 • South East Tennessee (Chattanooga CARES) - \$252,400
<p>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</p>	<p>Pursuant to HOPWA regulations, changes in eligibility jurisdictions for HOPWA may occur if a metropolitan area reaches a population of more than 500,000 and has a least 1,500 cumulative AIDS cases. The State’s method of distributing selects projects and proposals targeted at meeting local needs and taking steps to affirmatively further fair housing during implementation and supportive service gaps.</p>

<p>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</p>	<p>The method of selecting sponsors is through soliciting grant proposals to include grass roots faith-based and other community-based organizations. The purpose of this Request for Grant Proposal (RFGP) is to define the State’s minimum requirements, solicit grant proposals and gain adequate information from which the State can evaluate the services potential project sponsors propose to provide. The RFGP process for HOPWA is based on a five-year cycle, which was last issued in 2016 and will end June 30th, 2021. The contracts for these agencies are 1 year with the option to renew for four additional years. However, the States reserves the right to terminate a contract should there be substandard performance by a project sponsor. In the event a contract is terminated the State will solicit new agency proposals. The Department of Health will contract with established not-for-profit agencies that continually show both the capability to plan for, as well as the ability to provide direct intervention and housing assistance to eligible clients and their families. Proposals are evaluated on criteria such as technical services, organization, experience, and budget to name a few. Funds were awarded to sponsors who submitted proposals that best met, or exceeded the required criteria and provided a detailed budget, which best met the needs of HOPWA clients.</p>
<p>Describe how resources will be allocated among funding categories.</p>	<p>To address urgent needs of People living with AIDS/HIV and to assist in meeting the State’s goal, project sponsors may select from the following eligible HOPWA activities:</p> <ul style="list-style-type: none"> •STRMU- Short term rent, mortgage and utility assistance - \$500,000 •TBRA- Tenant based rental assistance - \$19,000 •Supportive Services to include nutrition, transportation, housing information services, and non-medical case management - \$200,000 •PHP- Permanente Housing Placement - \$14,300 - Facility-Based Short-term/Transitional Housing - \$5,000 <p>Project sponsor may also use funds for allocation of indirect cost of no more than 7% for grant administration.</p>

	Describe threshold factors and grant size limits.	Project sponsors may also use funds for allocation of indirect cost of no more than 7% for grant administration. Also, the Tennessee Department of Health will not exceed the 3% administrative cap for the HOPWA program.
	What are the outcome measures expected as a result of the method of distribution?	The state envisions the use of STRMU services and permanent housing placement to enhance the availability and sustainability by way of prevention of homelessness. HOPWA is also exploring the opportunity to provide tenant-based rental assistance to prevent homelessness among this population. The 7 project sponsors across the State will implement supportive services of various types to prevent homelessness. Our goal include meeting more with Project sponsors by leading the development of resources needed to advance services adequately and timely to prevent homelessness. This will be accomplished through monthly conference calls and training and though bi-annual statewide meetings to discuss challenges, barriers, outcomes and new ideas to improving care. For additional information to HOPWA goals see AP-70 HOPWA Goals-90.320(k)(4) in the State's action plan.
7	State Program Name:	Housing Trust Fund
	Funding Sources:	Housing Trust Fund
	Describe the state program addressed by the Method of Distribution.	The Housing Trust Fund (HTF) is an affordable housing production program that will complement existing Federal, state and local efforts to increase and preserve the supply of decent, safe, and sanitary affordable housing for extremely low- and very low-income households, including homeless families.

<p>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</p>	<p>Geographic Diversity. THDA will accept/consider proposals that are consistent with the State's certification to AFFH. THDA will establish a minimum score threshold that must be received to be eligible for HTF funding. This minimum score ensures that sound, well-designed, and financially viable rental housing will be financed using the HTF. THDA will rank applications by TN grand division that receive the minimum score. THDA will select the highest scoring application from each grand division. If additional funding is available, THDA will rank all remaining applications in a single ranking score. Those remaining applications that receive the highest score will be selected until funding runs out. Given the limited funding available statewide and to disperse the HTF across Tennessee, THDA reserves the right to limit funding to only one award per county. THDA reserves the right to not select a proposed project if sufficient funding is not available to award all funds requested by the applicant. In such instances and at its sole and absolute discretion, THDA may move to the next lower scoring project to meet its commitment obligations under the HTF.</p> <p>Ability to obligate NHTF funds. THDA will evaluate the experience of the entire proposed team with owning, developing and managing projects of similar size and scope serving the intended population proposed. Applicants and their development team must undergo an evaluation by THDA of their capacity to carry out the proposed housing project. THDA will evaluate the experience and capacity of the organization to ensure compliance with the requirements and regulations of all Federal, State and local housing programs used in conjunction with HTF funds; THDA will evaluate the history of the applicant and their team in serving the community in which the HTF-assisted housing is proposed.</p> <p>Ability to undertake eligible activities in a timely manner. Applicant must be capable of undertaking and completing HTF-funded activities in a timely manner. THDA will evaluate past performance of the applicant in completing THDA funded activities.</p> <p>For rental housing, the extent to which the project has Federal, State or local project-based rental assistance so rents are affordable to extremely low-income families. THDA will provide a preference for applications which propose to preserve existing housing with project-based rental assistance and for proposals with binding commitments of project-based vouchers to the project.</p> <p>For rental housing, the duration of the units' affordability period. All rental developments assisted with HTF resources will have a 30 year affordability period.</p>
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	<p>Merits of the application in meeting the State's priority housing needs. THDA will prioritize applications in county's with a higher rental housing need based on variables determined by THDA, which may include, but is not limited to, percent of extremely low-income renters, population growth rate, vacancy rate, and the pipeline of rental housing under construction. Additionally, THDA will provide a priority for applications located in census tracts of opportunity based on variables to be determined by THDA, which may include median gross rent, high cost burden, proximity to employment, high workforce participation, low levels of abandoned housing, rental market vacancy rate, and the pipeline of rental housing under construction.</p> <p>Extent to which application makes use of non-federal funding sources. To encourage the diversity of funding, THDA will provide a preference for applications that include the use of non-THDA, federal and non-federal resources towards the development of the housing. THDA will not consider rental assistance provided for the purposes of this category. THDA will award points based on the actual percentage of other non-THDA funds in the project against the total development costs of the project.</p>
<p>Describe how resources will be allocated among funding categories.</p>	<p>In total, 10% of funding will serve as an administrative fee for THDA. Up to 33% of funding may be used for operating cost assistance and operating cost assistance reserves for HTF assisted housing for which project-based rental assistance is not available. The State reserves the right to reallocate uncommitted operating funds to development costs if qualified applications for operating funds are insufficient to award all operating funds.</p>
<p>Describe threshold factors and grant size limits.</p>	<p>The grant minimum is \$250,000 and the grant maximum is \$900,000. There is no difference in minimum or maximum for non-entitlement, entitlement, urban and rural jurisdictions. THDA reserves the right to limit the number of grants per county to ensure that needs in a range of counties are met.</p>
<p>What are the outcome measures expected as a result of the method of distribution?</p>	<p>The outcome measure is that the activities under the HTF effectively address the housing needs of extremely low-income households.</p>

AP-40 Section 108 Loan Guarantee – 91.320(k)(1)(ii)

Will the state help non-entitlement units of general local government to apply for Section 108 loan funds?

No

Available Grant Amounts

NA

Acceptance process of applications

NA

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AP-45 Community Revitalization Strategies – 91.320(k)(1)(ii)

Will the state allow units of general local government to carry out community revitalization strategies?

No

State’s Process and Criteria for approving local government revitalization strategies

NA

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AP-50 Geographic Distribution – 91.320(f)

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

Funds are directed to the areas of the state with greatest need and/or areas that have had disproportionately fewer funds made available to them. HOME uses the Not Proportionally Served measure to advantage counties not receiving as many funds per capita than other counties. The HOME competition divides the resources between urban and rural counties so as to ensure a mixture of urban/city served by the state's HOME program.

All applicants for the TN CDBG program are considered and scored in the same way. All applicants (other than those considered under the slums and blight and urgent need national objectives) must serve at least 51% LMI households. There is not a specific geographic distribution planned.

HTF: Public Housing Authorities (PHAs), non-profit and for-profit entities in both entitlement and non-entitlement jurisdictions statewide are eligible to apply for HTF dollars however there will be a preference for areas of the state with the greatest need and/or projects that develop housing for extremely low-income households (residents earning less than 30% AMI) in areas of opportunity, as defined by the opportunity score developed by THDA.

Geographic Distribution

Target Area	Percentage of Funds
Non-Entitlement Statewide Grant Allocation Priority	100

Table 7 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

CDBG: In the past, geographic location was not part of the method of distribution for CDBG. Projects are selected based solely on how they compare to the other similar projects and if the eligible applicants have open projects.

HOME: Is competitive within certain categories. HOME funds are made available for competition as follows: 18% to the CHDO set-aside, and 67% allocated for urban and rural areas of the state, based upon the percentage of low-income households in the designated urban and rural counties, excluding local HOME Participating Jurisdictions (PJs). The urban allocation is 45% of the funds allocated to urban and rural areas and the rural allocation is 55% of the funds allocated to urban and rural areas. Local PJs are local governments in Tennessee that receive HOME funds directly from HUD: Bristol, Johnson City, Bluff City, Kingsport, Sullivan County, Washington County, Chattanooga, Clarksville, Jackson, Knoxville,

Memphis, Nashville-Davidson, Knox County and Shelby County. Urban and rural designations are based on the percent of the county's population who live in areas designated as rural. THDA will spend up to ten percent (10%) of its 2018 HOME allocation for administrative and planning expenses, (four percent (4%) for its own administrative expenses and six percent (6%) is available to pay the administrative costs of local governments and non-CHDO non-profit grant recipients).

ESG: THDA will spend up to 7.5% of its ESG allocation for administrative and planning expenses. THDA will share the amount available for administration with the small city entitlement communities that do not receive their own ESG allocation from HUD as well as other successful local government applications in the Competitive Round. Non-profit agencies are not eligible to receive funds for administration. For FY18 THDA will allocate \$150,000 each to the cities of Clarksville, Johnson City, Knoxville, and Murfreesboro. Each of these jurisdictions have either recently lost their direct ESG allocation from HUD or are the location of a major entity serving veterans, a key priority under the Tennessee State Plan to End Homelessness. Each program will operate its ESG program in accordance with its approved Consolidated Plan. Eligible activities include street outreach, shelter activities, homeless prevention, rapid re-housing, Homeless Management Information Systems (HMIS) and administration activities. The remaining ESG funds after the Small Cities Set-Aside and administration are will be allocated to eligible applicants in a competitive grant application process.

HOPWA: Pursuant to HOPWA regulations, changes in eligible jurisdictions for HOPWA may occur if a metropolitan area reaches a population of more than 500,000 and more than 2,000 persons living with HIV or AIDS and states with more than 2,000 persons living with HIV or AIDS outside of eligible metropolitan areas. EMSAs receive HOPWA funds directly from HUD annually. At the inception of State HOPWA, it was determined that State HOPWA would serve non-EMSAs only. The State is divided into seven HOPWA regions (East Tennessee, North East Tennessee, Upper Cumberland, Mid Cumberland, Mid Cumberland, South Central Tennessee, West Tennessee and South East Tennessee). The State has entered into a grant agreement with the seven regions for FY18-19. The formula for regional distribution of funds will be determined by the ratio of HIV/AIDS cases reported in each region to the total number of cases reported statewide.

HTF: non-profit and for-profit entities in entitlement and non-entitlement jurisdictions statewide are eligible to apply for HTF funds. In total, 10% of funds will serve as an administrative fee for THDA. Up to 33% may be used for operating cost assistance and operating cost assistance reserves for HTF assisted housing for which project-based rental assistance is not available. The State reserves the right to reallocate uncommitted operating funds to development costs if qualified applications for operating funds are insufficient to award all operating funds.

Affordable Housing

AP-55 Affordable Housing – 24 CFR 91.320(g)

Introduction

The state supports multiple housing goals with the Consolidated Plan programs. A summary of the one-year goals is presented below.

NOTE: Additional updates TBD.

One Year Goals for the Number of Households to be Supported	
Homeless	7,824
Non-Homeless	0
Special-Needs	0
Total	7,824

Table 8 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	320
The Production of New Units	34
Rehab of Existing Units	14
Acquisition of Existing Units	0
Total	368

Table 9 - One Year Goals for Affordable Housing by Support Type

Discussion

A number of other affordable housing activities taken on by the state are not reflected in the numbers above. Much of the ESG assistance provided is not a dedicated unit, as is required to be reported above, but instead is support for a homeless person. In all, we expect to assist directly or indirectly around 12,280 homeless persons.

HTF: The State of Tennessee estimates that it will develop 48 affordable housing units for extremely low-income households with funds from this program year.

AP-60 Public Housing - 24 CFR 91.320(j)

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

THDA supports Tennessee's Public Housing Authorities (PHAs) participating in HUD's Rental Assistance Demonstration (RAD) program. During this Consolidated Planning period, we met with PHAs on the RAD waiting list and drafted language preferencing RAD developments in the Public Housing Authority Set-Aside for the 2018 Low Income Tax Credit (LIHTC) Qualified Allocation Plan. THDA has supported RAD development in four of the last five QAPs. Tennessee RAD developments are located in Qualified Census Tracts (QCTs) and through RAD preferences, THDA is able to assist PHAs redevelop housing in these areas serving lower-income households.

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

THDA manages a Family Self Sufficiency (FSS) program for its Housing Choice Voucher (HCV) Program participants, which includes financial counseling and pre-purchase homeownership counseling for participants. THDA also offers a homeownership voucher option to participants of the FSS program. THDA is not able to offer these services to families participating in other PHA public housing or HCV programs.

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

NA

AP-65 Homeless and Other Special Needs Activities – 91.320(h)

Introduction

The objectives of the ESG program are:

1. To help improve the quality of emergency shelters for the homeless;
2. To help meet the costs of operating and maintaining emergency shelters;
3. To provide essential services so that homeless individuals have access to the assistance they need to improve their situation;
4. To provide street outreach services to the homeless; and
5. To provide emergency intervention assistance and rapid re-housing services to prevent homelessness and to obtain permanent housing.

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

Eligible street outreach activities among ESG grantees include: Essential services to eligible participants provided on the street or in parks, abandoned buildings, bus stations, campgrounds, and in other such settings where unsheltered persons are staying. Staff salaries related to carrying out street outreach are also eligible.

Eligible Program Participants: Unsheltered individuals and families who qualify as homeless under Category 1 of HUD's Definition of Homelessness

Allowable Activities:

- *Engagement* – Activities to locate, identify, and build relationships with unsheltered homeless persons for the purpose of providing immediate support, intervention, and connections with homeless assistance programs and/or social services and housing programs. Eligible costs include: initial assessment of need and eligibility; providing crisis counseling; addressing urgent physical needs; and actively connecting and providing information and referral. Eligible costs also include the cell phone costs of outreach workers during the performance of these activities
- *Case Management* – Assessing housing and service needs, and coordinating the delivery of individualized services. Eligible costs include: using a Continuum of Care centralized or coordinated assessment system; initial evaluation including verifying and documenting eligibility; counseling; helping to obtain Federal, State and local benefits; providing information and referral to other providers; and developing an individualized housing/service plan
- *Emergency Health Services* – Outpatient treatment of urgent medical conditions by licensed

- medical professionals; and providing medication and follow-up services
- *Emergency Mental Health Services* – Outpatient treatment of urgent mental health conditions by licensed professionals; medication costs and follow up services
- *Transportation* – Travel by outreach workers or other service providers during the provision of eligible outreach activities; costs of transportation of clients to emergency shelters or other service providers; and costs of public transportation for clients.
- *Services to Special Populations* – Essential Services that have been tailored to address the needs of **homeless youth, victims of domestic violence, and related crimes/threats, and/or people living with HIV/AIDS** who are literally homeless.

Addressing the emergency shelter and transitional housing needs of homeless persons

Eligible emergency shelter activities among ESG grantees include: essential services and operational expenses.

Eligible Participants: Individuals and families who qualify as homeless under Categories 1 and 4 of HUD’s Definition of Homelessness.

Allowable Activities:

Essential Services - This includes services concerned with employment, health, drug abuse, education and staff salaries necessary to provide these services and may include, but are not limited to: Assistance in obtaining permanent housing; Medical and psychological counseling and supervision; Employment counseling; Nutritional counseling; Substance abuse treatment and counseling; Assistance in obtaining other Federal, State and local assistance including mental health benefits; employment counseling; medical assistance; Veteran’s benefits; and income support assistance such as Supplemental Security Income, Food Stamps and Aid to Families with Dependent Children; Other services such as child care, legal services, life skills training, transportation, job placement and job training; and Staff salaries necessary to provide the above services. *Operating expenses* - Payment of eligible operation costs related to the operation of emergency and transitional housing, including but not limited to, maintenance, operation, rent, repair, security, fuel, equipment, insurance, utilities, food and furnishings.

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

Eligible rapid-rehousing activities among ESG grantees include: Activities related to help a homeless

individual or family to move into permanent housing.

Eligible Participants: Individuals and families who meet the definition of “homeless” who live in an emergency shelter or other place described in the definition provided by HUD.

Allowable Activities for Prevention and Rapid Re-Housing: Financial Assistance – Rental application fee (excludes pet deposit); moving costs; security deposit for rental or utility; payment of rental arrears up to six months; and short-term (up to 3 months) or medium-term (up to 9 months) rental and/or utility assistance.

Short and Medium Term Rental Assistance Requirements and Restrictions

- Compliance with FMR (Fair Market Rents) and Rent Reasonableness;
- For purposes of calculating rent, the rent must equal the sum of the total rent, any fees required for rental (excluding late fees and pet deposits), and, if the tenant pays separately for utilities (excluding telephone) the monthly allowance for utilities as established by the public housing authority for the area in which the housing is located
- Compliance with minimum habitability standards;
- Tenant based rental assistance means that participants select a housing unit in which to live and receive rental assistance. Project based rental assistance means that grantees identify permanent housing units that meet ESG requirements and enter into a rental assistance agreement with the owner to reserve the unit and subsidize it so that eligible program participants have access to the unit;
- A standard and legal lease must be in place;
- No rental assistance can be provided to a household receiving assistance from another public source for the same time period (with the exception of rental arrears); and
- Participants must meet with a case manager at least monthly for the duration of the assistance (participants who are victims of domestic violence are exempt if meeting would increase the risk of danger to client).
- The Grantee must develop an individualized plan to help the program participant remain in permanent housing after the ESG assistance ends.
- *Housing Relocation and Stabilization Services* – Housing search and placement; assessment of housing barriers and needs; landlord mediation; legal services resolving landlord/tenant matters; assistance with submitting rental applications and leases; assessment of housing for habitability, lead-based paint and rent reasonableness; case management; HMIS data collection and submission; credit repair counseling; budget classes; and monitoring and re-evaluating program participants.

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

Eligible prevention activities among ESG grantees include: Activities related to preventing persons from becoming homeless and to assist participants in regaining stability in their current or other permanent housing.

Eligible Participants: Extremely low-income individuals and families with household incomes of at or below 30% of Area Median Income who qualify as homeless under Categories 2, 3 and 4 of HUD's Definition of Homelessness or any category of HUD's Definition of "At Risk of Homelessness".

Allowable Activities for Prevention and Rapid Re-Housing: *Financial Assistance* – Rental application fee (excludes pet deposit); moving costs; security deposit for rental or utility; payment of rental arrears up to six months; and short-term (up to 3 months) or medium-term (up to 9 months) rental and/or utility assistance.

Short and Medium Term Rental Assistance Requirements and Restrictions

- Compliance with FMR (Fair Market Rents) and Rent Reasonableness;
- For purposes of calculating rent, the rent must equal the sum of the total rent, any fees required for rental (excluding late fees and pet deposits), and, if the tenant pays separately for utilities (excluding telephone) the monthly allowance for utilities as established by the public housing authority for the area in which the housing is located;
- Compliance with minimum habitability standards;
- Tenant based rental assistance means that participants select a housing unit in which to live and receive rental assistance. Project based rental assistance means that grantees identify permanent housing units that meet ESG requirements and enter into a rental assistance agreement with the owner to reserve the unit and subsidize it so that eligible program participants have access to the unit;
- A standard and legal lease must be in place;
- No rental assistance can be provided to a household receiving assistance from another public source for the same time period (with the exception of rental arrears); and
- Participants must meet with a case manager at least monthly for the duration of the assistance (participants who are victims of domestic violence are exempt if meeting would increase the risk of danger to client).
- The Grantee must develop an individualized plan to help the program participant remain in permanent housing after the ESG assistance ends.
- *Housing Relocation and Stabilization Services* – Housing search and placement; assessment of

housing barriers and needs; landlord mediation; legal services resolving landlord/tenant matters; assistance with submitting rental applications and leases; assessment of housing for habitability, lead-based paint and rent reasonableness; case management; HMIS data collection and submission; credit repair counseling; budget classes; and monitoring and re-evaluating program participants.

Discussion

Outside of the ESG funding priorities, THDA has a strategic priority to address the housing needs of youth transitioning out of foster care and ex-offenders. To support the development of affordable housing for these populations, THDA has provided competitive grants and additional points to PHAs and other non-profit housing providers through our Housing Trust Fund to construct units for youth transitioning out of foster care and ex-offenders.

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AP-70 HOPWA Goals – 91.320(k)(4)

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 to prevent homelessness of the individual or family	320
Tenant-based rental assistance	7
Units provided in permanent housing facilities developed, leased, or operated with HOPWA funds	7
Units provided in transitional short-term housing facilities developed, leased, or operated with HOPWA funds	4
Total	338

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AP-75 Barriers to affordable housing – 91.320(i)

Introduction

The Tennessee Consolidated Planning Partners are committed to affirmatively furthering fair housing. We continue to take steps to remove barriers to affordable housing that were identified in Tennessee's Analysis of Impediments to Fair Housing Choice.

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

TNECD supports statewide and local fair housing trainings and other educational events that address the various barriers to fair housing. TNECD supports the implementation of fair housing ordinances and policies for local governments. Additionally, TNECD is working with THDA and the TN Fair Housing Council to develop a fair housing guide directed specifically to local government officials and employees.

The HOME program manager and primary program staff plan to attend a Fair Housing training and conference scheduled for Spring 2019.

HOPWA Fair Housing Activities:

West TN Legal Services and Fair Housing and Disability Rights has partnered to provide the State of TN Department of Health, HOPWA Program bi-annual training on tenant and landlord rights and fair housing at our statewide meetings.

For FY18-19, THDA will complete the following actions in support of our Annual Action Plan to affirmatively further fair housing.

- Sponsor, support, participate in, and attend three statewide fair housing conferences across the state.
- Provide THDA fair housing education to all THDA employees through: Customized program training for program staff and fair housing overview training for other THDA staff.
- An online employee Title VI & Fair Housing training module and quiz were completed during 2017-18. All employees participated in this training and all new employees will participate as part of the onboarding process.
- An online training and self-assessment for Title VI & Fair Housing for sub-recipients and other partners has been completed and will be in use during 2018-19.
- THDA's Fair Housing & Title VI page were updated in 2018, and in honor of the 50th anniversary of the Fair Housing Act, articles and links were added to the front page of the THDA website and the Fair Housing & Title VI pages.

- Enhance sub-recipient, owner and managers training by adding fair housing, renters' rights and Title VI training to each THDA sponsored workshop.
- Develop a page to be added to TNHousingSearch.org that identifies fair housing issues and renters' rights responsibilities along with contact information for questions on discrimination. There are also plans to revamp of the Resources page which will include fair housing information.
- Sponsor, support and attend the workshops on Fair Housing Lending conducted by West Tennessee Legal Services in September 2018.
- Sponsor, support and attend the Knoxville Livability Summit to educate persons with disabilities on fair housing issues and help them find accessible housing opportunities.
- THDA presented fair housing training for PHAs at TAHRA's Spring Workshop in 2016 and plans to expand on that training for future TAHRA workshops.
- Develop the AFFH Guidebook for local governments and municipalities with TN-ECD and the TN Fair Housing Council. THDA has reached out to MTAS for assistance in adding a fair housing component to their training for new local government officials.
- A Limited English Proficiency (LEP) Analysis is underway to review where we have LEP language group(s) in areas of the state that constitute 5% or more of the population. The analysis will help guide a revision of our Language Assistance Plan and if as an agency we need take additional actions to serve our LEP population. As part of the analysis, a survey will be conducted with internal staff who interact with the public, sub-recipients/grantees, HBEI providers and lenders to determine their most common LEP encounters.

A full discussion of the Fair Housing Plan is included in the appendix.

Discussion

In addition to the actions we plan to affirmatively further fair housing, we plan to continue participation in the discussion around the taxation of the Low Income Housing Tax Credits in affordable housing developments. As was mentioned in the Consolidated Plan, efforts to study the effect of this taxation on existing and future properties was completed by Tennessee Advisory Council on Intergovernmental Relations. THDA has worked with the General Assembly and other stakeholders to educate the public on the impact to affordability housing that a statewide implementation of this tax may have.

AP-85 Other Actions – 91.320(j)

Actions planned to address obstacles to meeting underserved needs

Tennessee is committed to tackling the needs identified in the Consolidated Plan: affordable housing, community development and infrastructure, and housing and services for the homeless as well as those with special needs. Each program uses the information on need to inform their program actions. Funds are directed to the areas of the state with greatest need and/or areas that have had disproportionately fewer funds made available to them. HOME uses the “Not Proportionally Served” measure to advantage counties not receiving as many funds per capita than other counties. CBDG uses the “Ability to Pay” measure that determines the level of local financial contribution that is required, allowing impoverished communities receiving grants to receive more funds. This ability-to-pay determination includes per capita income, the value of taxable property, and the value of taxable sales. The Housing Trust Fund will use an opportunity score in order to promote the production of affordable housing in areas of opportunity. This will enable residents in need to have more access to opportunity and resources.

Actions planned to foster and maintain affordable housing

The State of Tennessee will continue to invest HOME and CDBG funds to promote the production, preservation, and rehabilitation of affordable housing for individuals and families of low- and very low-income. The state will also invest Housing Trust Fund dollars to promote the production, preservation, and rehabilitation of affordable housing for individuals and families of extremely low-income. The state will also invest in community infrastructure to support communities that are home to low income households. ESG and HOPWA also provide affordable housing both permanent and short term to special needs populations to support their affordable housing needs. The state also maintains relationships with local organizations which provide alternative housing services to fill the gaps between government-funded programs. This has been an important part to both fostering and maintaining affordable housing throughout the state.

Additional efforts are being made, both through regulatory and development avenues, to find new ways of providing quality, affordable housing. Energy efficiency improvements to the existing housing stock, emergency repair programs, and low-income housing tax credits are just some of the housing considerations being made to foster more housing that is affordable and in close proximity to resources and services. Further, THDA launched the Tennessee Housing Trust Fund which targets assistance to persons of very low income, those earning 50% or less of the area median income. Within the TN Housing Trust Fund, competitive grants support the chronically homeless, persons with mental retardation or mental illness, citizens with developmental disabilities, single mothers recovering from substance addiction or physical abuse, veterans with multiple needs and ex-offenders re-entering

society. In 2006, the TN Housing Trust Fund was established with \$12 million of THDA funds over a two-year period. Currently, the Housing Trust Fund is \$7.5 million per year. This allows for complementary housing activities in addition to those funding with CDBG and HOME funds, providing or maintaining critical affordable housing throughout Tennessee. In FY 17-18 THDA will implement the Challenge Grant Program that provides initial seed funding to support the fundraising efforts of nonprofit organizations across Tennessee to implement housing activities that represent unique milestones, are part of a broad community initiative, or are part of a significant expansion of work outside the normal day to day activities of the organization. This program will provide opportunities to support unique projects that result in significant community or regional impact. THDA developed the Low-Income Housing Tax Credit Program Qualified Contract Guide to assist buyers that are willing to purchase and maintain properties that are eligible to opt-out of the LIHTC program. THDA is developing a network of qualified purchasers and will market qualified LIHTC properties on their website to find the best sales contracts which will maintain the affordable housing inventory in Tennessee.

Actions planned to reduce lead-based paint hazards

The State of Tennessee addresses hazards of lead based paint in the state through the following programs/initiatives. In May 1999, by state legislation, the Tennessee Department of Environment and Conservation (TDEC) was given the necessary authority to have lead-based paint training in the state. The legislation also gave TDEC the authority to monitor lead abatement in the state to assure that contractors and owners of units comply with applicable laws. The division of solid waste management of TDEC received authorization from the Environmental Protection Agency (EPA) on January 17, 2001, to administer the program in the state. The state has established guidelines for training of lead-abatement contractors and their workers in the state.

Lead-based paint policies are also in effect for the CDBG, HTF, and HOME programs in the state. Specifically, grantees must give participants notice of possible lead hazards within the unit when the house is pre-1978, informing them of possible lead dangers. For families with children under age seven, grantees must inspect units that might have lead contamination and provide the necessary abatement or encapsulation activities. Families must be given a federally approved pamphlet on lead poisoning prevention.

Housing assisted with ESG funds is subject to the Lead-Based Paint Poisoning Prevention Act and the Act's implementing regulations at 24 CFR Part 35, Subparts C through M for any building constructed prior to 1978. Grantees using ESG funds only for essential services and operating expenses must comply with Subpart K to eliminate as far as practical lead-based paint hazards in a residential property that receives federal assistance for acquisition, leasing, support services or operation activities. Grantees using ESG funds for renovation, major rehabilitation or conversion must comply with Subpart J to eliminate as far as practical lead-based paint hazards that receives federal assistance for

rehabilitation. The Lead-Based Paint Regulations are available at www.hud.gov/lea.

The Tennessee Department of Health, Childhood Lead Poisoning Prevention Program, provides lead poisoning information such as lead sources and prevention tips for parents and health care professional. The Prevention Programs requires TennCare, the state health system for uninsured persons, to test children enrolled in the program. All children, regardless of payer source, with elevated blood lead levels receive case management services. Children with a blood lead level that repeats elevated or is > 20 µg/dl may receive an environmental investigation per the physician's request. The department links with the Tennessee Department of Environment and Conservation's information on lead assessment and abatement programs.

Actions planned to reduce the number of poverty-level families

In all the work done by the Consolidated Partners to address housing and community development needs, low, very low and extremely low households are being served. Through the services provided through the five programs addressed in this plan and the other resources brought to bear on housing and community development needs across the state, the economic well-being of families is being addressed through safe, sound affordable housing and communities.

CDBG – For several years, the CDBG program did not separate extremely low-, very low-, and low-income beneficiary data to show participants below 30 percent of the AMI. ECD is now collecting data on program participants below 30 percent of the AMI. Also, as a part of its scoring mechanism for housing rehabilitation, project need points are awarded based on the number of persons with higher poverty levels in the state, specifically persons 62 years of age or above, and/or female heads-of-household, and/or disabled individuals. ECD does not collect 30% AMI for projects that qualify for meeting LMI based on HUD defined LMI percentages, as these are only provided for 50%, 80% and 120% of AMI.

HOME – The HOME Program serves very low- and low-income households. Very low-income households are defined as those households whose annual income is 50 percent or less of the AMI for the county in which the household resides. Low-income households are defined as those households whose annual income is between 50 percent and 80 percent of the AMI for the county in which the household resides. Additionally, the THDA Board of Directors has expressed intent that very low-income persons be served. In 2016-17, 48 percent of HOME beneficiaries were very low-income households. Of the 71 very low income households served, 23.9% of those were considered extremely low income, earning 0-30% AMI.

HTF - The HTF exclusively serves extremely low-income households earning less than 30% AMI. This is a new program therefore the statistics on previous clients served through this program are not available.

Additionally, the state coordinates resources so that services to households at or below 80% AMI are effectively administered. Continued coordination efforts include plans to further address the housing needs of youth transitioning from foster care and to support the housing needs for non-traditional

students pursuing post-secondary education degrees.

Actions planned to develop institutional structure

Please see below.

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

To address this as well as the development of the institutional structure, it is important to recognize the grantees in the Consolidated Planning programs as well as the partnerships each of the state Consolidated Planning partners foster above and beyond these four programs. By using CHDOs, local and regional governments, and social service agencies, the State has invested in the existing structure to implement our programs while requiring and monitoring a level of quality that improves the housing affordability and quality of the units impacted by these funds.

Additionally, THDA remains a strong supporter of the state and regional Affordable Housing Coalitions. We remain committed to providing staffing support to the Coalitions as they continue their transition to full independence from THDA. The Coalition is made up of 251 members. Of these 100 are non-profits, 48 are municipal entities (including PHA's), 35 represent financial institutions (including CDFI's), 11 are state or Federal government officials, and 57 are other (including developers, realtors, consultants, property managers, etc.).

THDA has a Lender/Realtor Advisory Board that assists us in ensuring that our programs are responsive to the needs of our consumers and our partners.

Our grantees are local governments, regional Development Districts and not-for-profits. Each of these partnerships adds strength to the overall institutional structure as well as the strong public-private partnerships that exist throughout the state.

Additionally, THDA promotes participation and the active involvement of HCV residents in all aspects of the Housing Choice Voucher program mission and operation. HCV participants are invited to serve on a Resident Advisory Board to represent their interests. THDA's Resident Advisory Board is composed of active HCV participants who provide supportive assistance to HCV personnel. The Resident Advisory Board consist of a maximum of fifteen (15) members. If more than fifteen (15) persons volunteer for the Board, THDA utilizes a random selection process to ensure proportionate representation from the East, West and Middle divisions of the state. In addition, as required by the federal regulations, the THDA Board of Directors includes one eligible resident board member who is eligible to vote on Housing Choice Voucher program issues. The goal of the Resident Advisory Board is to positively impact the overall quality and delivery of HCV services and improve the overall quality of life for HCV participants.

Program Specific Requirements

AP-90 Program Specific Requirements – 91.320(k)(1,2,3)

Community Development Block Grant Program (CDBG) Reference 24 CFR 91.320(k)(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	308,671.48
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:	308,671.48

Other CDBG Requirements

1. The amount of urgent need activities	1,000,000
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	95.00%

HOME Investment Partnership Program (HOME) Reference 24 CFR 91.320(k)(2)

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

NA

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:

CHDOs must use HOME funds to develop units for homeownership, including new construction or acquisition and substantial rehabilitation of substandard single-family dwellings. HOME funds *are to be used as the primary method of financing* (without interest cost) *for the development of affordable single-family units*. The CHDO must be the owner-developer of the project. At the time of permanent financing the HOME funds are repaid to the CHDO as CHDO proceeds and are used to develop additional single-family units for homeownership. A CHDO must allow up to \$14,999 of HOME funds to remain with the unit as a soft second mortgage as necessary to qualify the household for permanent financing, but not less than \$1,000. THDA requires that a subsidy remain in the financing when the unit is sold so affordability is based on the less restrictive recapture provision of the HOME regulations. Any homeownership unit developed by a CHDO that cannot be sold to an eligible homeowner within nine months of project completion must be converted to rental housing and rented to an income eligible tenant.

Cities, counties and non-profit organizations (non-CHDO) – Homeownership programs are restricted to a soft second mortgage necessary to qualify the household for permanent financing.

Soft second mortgages – Any HOME funds used for a soft second mortgage in homeownership programs are limited to the lesser of \$14,999 in HOME funds or the amount of HOME funds necessary to qualify the household for permanent financing, but not less than \$1,000. All grant recipients using HOME for soft second mortgages must use the THDA single-family underwriting template to determine the amount of HOME assistance, and must submit the determination to THDA for review and final approval. If the underwriting template indicates that the homebuyer does not have an unmet need for the soft second mortgage, the grant recipient may not provide direct HOME assistance to that homebuyer. The amount of the soft second mortgage is the “direct HOME subsidy” provided to the homebuyer and subject to recapture.

The soft second mortgage will have an affordability period of five years which is forgiven at the end of the fifth year if the unit remains in compliance, i.e., the unit remains the permanent residence of the initial buyer and is not leased or vacated. If the unit is sold or transferred during the affordability period, the amount of the HOME subsidy subject to recapture will be reduced by twenty percent (20%) per year of occupancy by the initial homebuyer. If the unit is leased or vacated during the affordability period, the entire HOME subsidy must be repaid.

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:

Down Payment Programs by Local Communities or Non-CHDO Non-Profit Orgs: A grant recipient who is a local community or a non-CHDO non-profit organization may provide down payment and closing cost assistance as a soft second mortgage in an amount equal to the lesser of \$14,999 in

HOME funds or the amount of HOME funds necessary to qualify a household for permanent financing, but not less than \$1,000. There will be an affordability period of 5 years, secured by a Note and Deed of Trust between the grant recipient and the homebuyer. The HOME loan is forgiven at the end of the fifth year if the unit remains in compliance with HOME requirements. This means that the property remains the primary residence of the initial buyer and is not leased or vacated. If the property is sold or transferred at the end of the affordability period, the homebuyer has complied with these recapture provisions. If the unit is sold or transferred during the affordability period, the amount of the HOME subsidy subject to recapture will be reduced by 20% per year of occupancy by the initial homebuyer. If the unit is leased or vacated during the affordability period, the entire HOME subsidy must be repaid. *CHDOS*: At the time of the sale of the unit to an eligible homebuyer, the CHDO must leave up to \$14,999 of HOME funds in the unit as a soft second mortgage in an amount equal to the lesser of \$14,999 in HOME funds or the amount of HOME funds necessary to qualify a household for permanent financing, but not less than \$1,000. There will be an affordability period of five years, secured by a Note and Deed of Trust between the CHDO and the homebuyer. The HOME loan is forgiven at the end of the 5th year if the unit remains in compliance with HOME requirements. This means that the property remains the primary residence of the initial homebuyer and is not leased or vacated. If the property is sold or transferred at the end of the affordability period, the homebuyer has complied with these recapture provisions. If the unit is sold or transferred during the affordability period, the amount of the HOME subsidy subject to recapture will be reduced by 20% per year of occupancy by the initial homebuyer. If the unit is leased or vacated during the affordability period, the entire HOME subsidy must be repaid. *Sale/Transfer of the Property*: The HOME-assisted homebuyer may sell or otherwise transfer the unit on or before the end of the affordability period to any willing buyer at any price, and the amount of the HOME subsidy subject to recapture will be reduced by 20 percent per year of occupancy by the initial buyer. The amount subject to recapture is limited by the availability of net proceeds. The net proceeds are the sales price minus superior non-HOME loan repayments minus closing costs. If the net proceeds are not sufficient to recapture the remaining outstanding principal balance of the HOME Note plus the amount of the down payment made by the homeowner, if any, plus the amount of any capital improvement investment made by the homeowner, then the Grantee shall recapture a pro rata share of the net proceeds of the sale in lieu of the full remaining outstanding principal balance of the HOME Note. "Capital improvement investment" investment means the improvements to the property made at the homeowner's expense (and not through some other form of subsidy), as evidenced by receipts or cancelled checks detailing the capital improvements made. Capital improvements do not include items of maintenance, deferred maintenance or cosmetic improvements. The pro rata amount to be recaptured shall be calculated in accordance with the HOME Program Regulations at 24 CFR 92.254(a)(5)(ii)(A)(3).

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:

NA

**Emergency Solutions Grant (ESG)
Reference 24 CFR 91.320(k)(3)**

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

The written standards for providing ESG assistance, *The Emergency Solutions Grant Program Policies and Procedures* are attached and can also be found at the THDA website <https://s3.amazonaws.com/thda.org/Documents/Business-Partners/Grant-Administrators/ESG-Program/ESG-Policies-and-Procedures.pdf>

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

Tennessee has eight Continuums of Care under the ESG funding umbrella. Each CoC is attempting to address the coordinated assessment system in a way that meets the needs of the individual region. For instance, the Cities of Murfreesboro and Chattanooga, have centralized physical locations for those needing assistance. While effective for a city, the model does not work for the other CoC regions that cover eight to 23 counties. In Upper East Tennessee, led by Appalachian Regional Homeless Coalition (ARCH), there are three physical intake locations in Bristol, Kingsport and Johnson City at the Salvation Army offices. West Tennessee, led by TN Homeless Solutions, has created a hotline to assess over the phone and refer potential clients to the closest agency for services. The remaining CoCs (Homeless Advocacy for Rural TN, TN Valley Coalition to End Homelessness and Buffalo Valley) have opted for a centralized system of intake for their Continuum agencies. Using the 'No Wrong Door' philosophy each agency within a Continuum uses the same intake process/paperwork within that region.

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).

The method of distribution across the geographic areas both with set asides and competition for funds is described in the AP-30 Method of Distribution section.

The State of Tennessee, through THDA, will accept applications for the ESG program from non-profit organizations. Non-profit applicants must submit **PART V: Non-Profit Checklist** with supporting documentation, and **PART VI: Non-Profit Board Composition**.

To be eligible to apply for ESG funding the non-profit organization must:

- Be organized and existing as a non-profit agency under Tennessee law, as evidenced by a Certificate of Existence from the Tennessee Secretary of State dated within six months of the application due date OR
- Be organized or existing under the laws of another state but eligible to conduct business in the State of Tennessee;
- Demonstrate at least two (2) years of experience providing affordable housing or affordable housing related services in the state of Tennessee satisfactory to THDA, in its sole discretion.
- Have no part of its net earnings inuring to the benefit of any member, founder, contributor or individual;
- Be established for charitable purposes and whose activities include, but are not limited to, the promotion of social welfare and the prevention or elimination of homelessness, as evidenced in its charter, articles of incorporation, resolutions or by-laws, and experience in the provision of shelter and services to the homeless;
- Have standards of financial accountability that conform to 24 CFR 84.21, Standards of Financial Management Systems; and
- Have an IRS designation under Section 501(c)(3) or Section 501(c)(4) of the federal tax code. A 501(c)(3) non-profit applicant may not submit an application until they have received their designation from the IRS. A 501(c)(4) non-profit applicant must provide documentation satisfactory to THDA, in its sole discretion, that the non-profit has filed the necessary materials with the IRS and received a response from the IRS demonstrating 501(c)(4) status.
- Faith-based organizations receiving ESG funds, like all organizations receiving HUD funds, must serve all eligible beneficiaries without regard to religion.
- Have approved established ESG Written Standards in accordance with Continuum of Care Coordinated Entry process.
- Submit certification of participation in local Continuum of Care activities and HMIS reporting.

Non-profit organizations are eligible to receive funds for shelter activities only if such funding is approved by the local government jurisdiction where programs are based. Each application from a nonprofit seeking funds for shelter activities should contain **PART VII: Certification of Local Government Approval** specific to housing and service locations that it controls within each jurisdiction. This Attachment must be submitted to THDA at the time of application. If the organization intends to provide homeless assistance in a number of jurisdictions, the certification of approval must be submitted by each of the units of local government in which the projects are to be located.

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.

It is a requirement for all ESG subrecipients to formulate homelessness participation in their

program. It is required information on the application. All grantees either have a homeless or formerly homeless individual on staff or on the board, or they have incorporated a process to involve the homeless to participate in policy-making decisions.

5. Describe performance standards for evaluating ESG.

The Tennessee ESG Policies and Procedures Manual instructs grantees to adopt performance standards consistent with HUD and THDA program requirements.

Performance Standards/Measures: THDA must ensure that programs and activities funded through the ESG program meet certain Performance Standards as set by the local Continuum of Care, THDA, and HUD. The following is an example of the types of Standards that THDA and its sub-recipients will be required to meet in order to demonstrate success of the ESG program:

- Reducing the average length of time a person is homeless
- Reducing returns to homelessness
- Improving program coverage
- Reducing the number of homeless individuals and families
- Reducing the number of chronically homeless individuals and families
- Improving employment rate and income amounts of program participants
- Reducing first time homelessness
- Preventing homelessness and achieving independent living in permanent housing for families and youth defined as homeless under other Federal programs

Although THDA understands many sub-recipients have chosen to provide one-time emergency rent or utility assistance to prevent homelessness, sub-recipients receiving ESG funds should use all available resources that will ensure the ongoing housing stability of program participants.

Discussion

Please note that each year, TNECD typically funds 2-3 urgent need activities during a program year. This is dependent on circumstances and can change from year-to-year.

Housing Opportunities for Persons with AIDS (HOPWA)

91.320(k)(4)

YES (described below and in AP-30) HOPWA Specific: Does the Action Plan identify the method for selecting project sponsors (including providing full access to grassroots faith-based and other community organizations)?

Description:

The method of selecting sponsors is through soliciting grant proposals to include grass roots faith-based and other community-based organizations. The purpose of this Request for Grant Proposal (RFGP) is to define the State's minimum requirements, solicit grant proposals and gain adequate information from which the State can evaluate the services potential project sponsors propose to provide. The RFGP process for HOPWA is based on a five-year cycle, which was last issued in 2016 and will end June 30th, 2021. The contracts for these agencies are 1 year with the option to renew for four additional years. However, the States reserves the right to terminate a contract should there be substandard performance by a project sponsor. In the event a contract is terminated the State will solicit new agency proposals. The Department of Health will contract with established not-for-profit agencies that continually show both the capability to plan for, as well as the ability to provide direct intervention and housing assistance to eligible clients and their families. Proposals are evaluated on criteria such as technical services, organization, experience, and budget to name a few. Funds were awarded to sponsors who submitted proposals that best met, or exceeded the required criteria and provided a detailed budget, which best met the needs of HOPWA clients.

Housing Trust Fund (HTF)
Reference 24 CFR 91.320(k)(5)

1. How will the grantee distribute its HTF funds? Select all that apply:

- Applications submitted by eligible recipients
- Subgrantees that are State Agencies
- Subgrantees that are HUD-CPD entitlement grantees

2. If distributing HTF funds through grants to subgrantees, describe the method for distributing HTF funds through grants to subgrantees and how those funds will be made available to state agencies and/or units of general local government. If not distributing funds through grants to subgrantees, enter "N/A".

N/A

3. If distributing HTF funds by selecting applications submitted by eligible recipients,

a. Describe the eligibility requirements for recipients of HTF funds (as defined in 24 CFR § 93.2). If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

The Tennessee Housing Development Agency will distribute HTF funds by selecting applications submitted by eligible recipients. Eligible recipients include organizations, agencies, and other for-profit and non-profit entities. A recipient must:

- Eligible participants will include public housing authorities and both for-profit and nonprofit organizations which are organized and existing to do business in the State of Tennessee, or if organized in another state, must be qualified to do business in the State of Tennessee. All Applicants must demonstrate at least two years of related housing experience in Tennessee.
- Demonstrate the financial capacity necessary to undertake, complete, and manage the proposed project, as demonstrated by its ability to own, construct, or rehabilitate and manage and operate affordable rental housing. THDA will evaluate the experience of the entire proposed team with owning, developing and managing projects of similar size and scope serving the intended population proposed. Applicants and their development team must undergo an evaluation by THDA of their capacity before the applicant qualifies as an eligible recipient.
- Have demonstrated understanding of the Federal, State and local housing programs used in conjunction with HTF funds to ensure compliance with all applicable program requirements and regulations.
- Not be debarred or excluded from receiving federal assistance or THDA assistance prior to selection or entering into a Written Agreement or closing the loan.
- Certify that housing units assisted with the HTF will comply with HTF program requirements during the entire period that begins upon selection and ending upon the conclusion of all HTF - funded activities.

b. Describe the grantee's application requirements for eligible recipients to apply for HTF funds. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

- Eligible participants will include public housing authorities and both for-profit and nonprofit organizations which are organized and existing to do business in the State of Tennessee, or if organized in another state, must be qualified to do business in the State of Tennessee. All Applicants must demonstrate at least two years of related housing experience in Tennessee.
- Demonstrate the financial capacity necessary to undertake, complete, and manage the proposed project, as demonstrated by its ability to own, construct, or rehabilitate and manage and operate affordable rental housing. THDA will evaluate the experience of the entire proposed team with owning, developing and managing projects of similar size and scope serving the intended population proposed. Applicants and their development team must undergo an evaluation by THDA of their capacity before the applicant qualifies as an eligible recipient.
- Have demonstrated understanding of the Federal, State and local housing programs used in conjunction with HTF funds to ensure compliance with all applicable program requirements and regulations.
- Not be debarred or excluded from receiving federal assistance or THDA assistance prior to selection or entering into a Written Agreement or closing the loan.

- Certify that housing units assisted with the HTF will comply with HTF program requirements during the entire period that begins upon selection and ending upon the conclusion of all HTF - funded activities.

c. Describe the selection criteria that the grantee will use to select applications submitted by eligible recipients. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

Tennessee will select recipients of HTF resources through a competitive selection process that will evaluate the following factors:

1. Geographic Diversity

THDA will accept and consider proposals for HTF resources that will serve communities across the state consistent with the State's certification to affirmatively further fair housing. THDA will establish a minimum score threshold that must be received in order to be eligible for NHTF funding. This minimum score will be determined to ensure that sound, well-designed, and financially viable rental housing will be financed using HTF resources. THDA will rank all applications by Tennessee's three Grand Divisions – East, Middle, and West - that receive the minimum score. THDA will select the highest scoring application from each Grand Division. If additional funding is available, THDA will then rank all remaining applications in a single ranking by score. Those remaining applications that receive the highest score will be selected until funding runs out. Given the limited funding available statewide and to disperse HTF funding across Tennessee, THDA reserves the right to limit funding to only one award per county. THDA also reserves the right to not select a proposed project if sufficient funding is not available to award all funds requested by the applicant. In such instances and at its sole and absolute discretion, THDA may move to the next lower scoring project(s) in order to meet its commitment obligations under the HTF program.

2. Applicant Capacity to obligate HTF funds and undertake eligible activities in a timely manner

THDA will evaluate the experience of the entire proposed team with owning, developing and managing projects of similar size and scope serving the intended population proposed. Applicants and their development team must undergo an evaluation by THDA of their capacity to carry out the proposed housing project before the applicant qualifies as an eligible recipient. THDA will also evaluate the experience and capacity of the organization to ensure compliance with the requirements and regulations of all Federal, State and local housing programs used in conjunction with HTF funds; THDA will also evaluate the history of the applicant and project team in serving the community in which the HTF - assisted housing is proposed. The applicant must be capable of undertaking and completing HTF - funded activities in a timely manner. THDA will evaluate the past performance of the applicant in completing THDA funded development activities.

3. Project-Based Rental Assistance

For rental housing, the extent to which the project has Federal, State or local project-based rental assistance so rents are affordable to extremely low-income families: THDA will provide a preference for applications which propose to preserve existing housing with project-based rental assistance and for proposals with binding commitments of project-based vouchers to the project.

4. Duration of Affordability Period

For rental housing, the duration of the units' affordability period: All rental developments assisted with HTF resources will have a 30-year period of affordability. No additional consideration is proposed for developments that will extend the period of affordability beyond this minimum requirement.

5. Priority Housing Needs of the State

The merits of the application in meeting the State's priority housing needs: THDA will provide a priority for applications in counties with a higher rental housing need based on variables determined by THDA, which may include, but is not limited to, percent of extremely low income renters, population growth rate, vacancy rate, and the pipeline of rental housing under construction. Additionally, THDA will provide a priority for applications located in census tracts of opportunity based on variables to be determined by THDA, which may include median gross rent, high cost burden, proximity to employment, high workforce participation, low levels of abandoned housing, rental market vacancy rate, and the pipeline of rental housing under construction.

6. Leveraging

The extent to which application makes use of non-federal funding sources: THDA manages federal resources, including the HOME Investment Partnership Program and the Housing Choice Voucher Program. In order to encourage the diversity of funding sources, THDA will provide a preference for applications that include the use of non - THDA, federal and non-federal resources towards the development of the housing. THDA will not consider rental assistance provided for the purposes of this category. THDA will award points based on the actual percentage of other non - THDA funds in the project against the total development costs of the project. In order to receive points, written documentation committing the non - THDA funds must be included in the application.

7. Other

(1) Applications that propose housing in which more than 20% of the assisted units will be set aside for individuals with disabilities must meet the qualities of settings that are eligible for reimbursement under the Medicaid home and community-based services that were established by the Centers for Medicare and Medicaid Services (CMS) in the final rule dated January 16, 2014:

<https://www.federalregister.gov/articles/2014/01/16/2014-00487/medicaid-program-state-plan-home-and-community-based-services-5-year-period-for-waivers-provider>. The final rule

requires that all home and community-based settings meet certain qualifications, including:

- The setting is integrated and supports full access to the greater community;
- Is selected by the individual from among setting options;
- Ensures individual rights of privacy, dignity, and respect, and freedom from coercion and restraint;
- Optimizes autonomy and independence in making life choices; and,
- Facilitates choice regarding services and who provides them. Additionally for provider owned or controlled residential settings, the following additional requirements apply:
 - The individual has a lease or other legally enforceable agreement providing similar protections;
 - The individual has privacy in their unit including lockable doors, choice of roommates, and freedom to furnish or decorate the unit;
 - The individual controls his/her own schedule, including access to food at any time;
 - The individual can have visitors at any time; and,
 - The setting is physically accessible

(2) THDA will evaluate the design of the proposed project for the population to be served, including unit configuration, on-site amenities and services, integration with mixed income housing options, and access to community services, including education, transportation, medical, support, recreation, and other activities of daily living.

(3) THDA will evaluate the firm financial commitments available for the proposed project as well as the extent that site control of the proposed project location(s) has been obtained.

(4) THDA will evaluate the inclusion of universal design features into the housing design.

d. Describe the grantee's required priority for funding based on geographic diversity (as defined by the grantee in the consolidated plan). If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

THDA will accept and consider proposals for HTF resources that will serve communities across the state consistent with the State's certification to affirmatively further fair housing. THDA will establish a minimum score threshold that must be received in order to be eligible for NHTF funding. This minimum score will be determined to ensure that sound, well-designed, and financially viable rental housing will be financed using HTF resources. THDA will rank all applications by Tennessee's three Grand Divisions – East, Middle, and West - that receive the minimum score. THDA will select the highest scoring application from each Grand Division. If additional funding is available, THDA will then rank all remaining applications in a single ranking by score. Those remaining applications that receive the highest score will be selected until funding runs out. Given the limited funding available statewide and to disperse HTF funding across Tennessee, THDA reserves the right to limit funding to only one award per county. THDA also reserves the right to not select a proposed project if sufficient funding is not available to award all funds requested by the applicant. In such instances and at its sole and absolute discretion, THDA may move to the next lower scoring project(s) in order to meet its commitment obligations under the HTF program.

e. Describe the grantee's required priority for funding based on the applicant's ability to obligate HTF funds and undertake eligible activities in a timely manner. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

THDA will evaluate the experience of the entire proposed team with owning, developing and managing projects of similar size and scope serving the intended population proposed. Applicants and their development team must undergo an evaluation by THDA of their capacity to carry out the proposed housing project before the applicant qualifies as an eligible recipient. THDA will also evaluate the experience and capacity of the organization to ensure compliance with the requirements and regulations of all Federal, State and local housing programs used in conjunction with HTF funds; THDA will also evaluate the history of the applicant and project team in serving the community in which the HTF - assisted housing is proposed.

The applicant must be capable of undertaking and completing HTF - funded activities in a timely manner. THDA will evaluate the past performance of the applicant in completing THDA funded development activities.

f. Describe the grantee's required priority for funding based on the extent to which the rental project has Federal, State, or local project-based rental assistance so that rents are affordable to extremely low-income families. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

For rental housing, the extent to which the project has Federal, State or local project-based rental assistance so rents are affordable to extremely low-income families: THDA will provide a preference for applications which propose to preserve existing housing with project-based rental assistance and for proposals with binding commitments of project-based vouchers to the project.

g. Describe the grantee's required priority for funding based on the financial feasibility of the project beyond the required 30-year period. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

For rental housing, the duration of the units' affordability period: All rental developments assisted with HTF resources will have a 30 year period of affordability. No additional consideration is proposed for developments that will extend the period of affordability beyond this minimum requirement.

h. Describe the grantee's required priority for funding based on the merits of the application in meeting the priority housing needs of the grantee (such as housing that is accessible to transit or employment centers, housing that includes green building and sustainable development features, or housing that serves special needs populations). If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

The merits of the application in meeting the State's priority housing needs: THDA will provide a priority for applications in counties with a higher rental housing need based on variables determined by THDA, which may include, but is not limited to, percent of extremely low income renters, population growth rate, vacancy rate, and the pipeline of rental housing under construction. Additionally, THDA will provide a priority for applications located in census tracts of opportunity based on variables to be determined by THDA, which may include median gross rent, high cost burden, proximity to employment, high workforce participation, low levels of abandoned housing, rental market vacancy rate, and the pipeline of rental housing under construction.

i. Describe the grantee's required priority for funding based on the extent to which the application makes use of non-federal funding sources. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

The extent to which application makes use of non-federal funding sources: THDA manages federal resources, including the HOME Investment Partnership Program and the Housing Choice Voucher Program. In order to encourage the diversity of funding sources, THDA will provide a preference for applications that include the use of non - THDA, federal and non-federal resources towards the development of the housing. THDA will not consider rental assistance provided for the purposes of this category. THDA will award points based on the actual percentage of other non - THDA funds in the project against the total development costs of the project. In order to receive points, written documentation committing the non - THDA funds must be included in the application.

4. Does the grantee's application require the applicant to include a description of the eligible activities to be conducted with HTF funds? If not distributing funds by selecting applications submitted by eligible recipients, select "N/A".

Yes

5. Does the grantee's application require that each eligible recipient certify that housing units assisted with HTF funds will comply with HTF requirements? If not distributing funds by selecting applications submitted by eligible recipients, select "N/A".

Yes

6. Performance Goals and Benchmarks. The grantee has met the requirement to provide for performance goals and benchmarks against which the grantee will measure its progress, consistent with the grantee's goals established under 24 CFR 91.315(b)(2), by including HTF in its housing goals in the housing table on the SP-45 Goals and AP-20 Annual Goals and Objectives screens.

Yes

7. Maximum Per-unit Development Subsidy Amount for Housing Assisted with HTF Funds. Enter or attach the grantee's maximum per-unit development subsidy limits for housing assisted with HTF funds. The limits must be adjusted for the number of bedrooms and the geographic location of the project. The limits must also be reasonable and based on actual costs of developing non-luxury housing in the area.

If the grantee will use existing limits developed for other federal programs such as the Low Income Housing Tax Credit (LIHTC) per unit cost limits, HOME's maximum per-unit subsidy amounts, and/or Public Housing Development Cost Limits (TDCs), it must include a description of how the HTF maximum per-unit development subsidy limits were established or a description of how existing limits developed for another program and being adopted for HTF meet the HTF requirements specified above.

To implement the Housing Trust Fund program, THDA will follow HUD the interim policy issued for the HOME Program that requires the use of the Section 234-Condominium Housing, elevator-type, basic mortgage limits as the maximum per unit subsidy limits for the Housing Trust Fund program. Effective as of November 7, 2017 and until it is amended, superseded, or rescinded, the maximum per unit subsidy for the HOME program is as follows:

Minimum HOME Dollars
\$1,000 Per Unit Limit

Maximum HOME Dollars
\$60,021 - Efficiency
\$68,806 - 1 Bedroom
\$83,667 - 2 Bedrooms
\$108,239 - 3 Bedrooms
\$118,812 - 4+ Bedrooms

For the Housing Trust Fund, the State of Tennessee adopted the limits used in the HOME program in order to have consistency among the federal grant programs that we administer. These limits have proven to be successful for the HOME program and, due to the similarities between programs, we believe they will also be successful for the HTF program.

8. Rehabilitation Standards. The grantee must establish rehabilitation standards for all HTF-assisted housing rehabilitation activities that set forth the requirements that the housing must meet upon

project completion. The grantee's description of its standards must be in sufficient detail to determine the required rehabilitation work including methods and materials. The standards may refer to applicable codes or they may establish requirements that exceed the minimum requirements of the codes. The grantee must attach its rehabilitation standards below.

In addition, the rehabilitation standards must address each of the following: health and safety; major systems; lead-based paint; accessibility; disaster mitigation (where relevant); state and local codes, ordinances, and zoning requirements; Uniform Physical Condition Standards; and Capital Needs Assessments (if applicable).

All HTF units must meet the specific Design Standards as prescribed by THDA in the Program description. These standards are specific to rehabilitation of existing units and new construction. In addition, all HTF units must meet all applicable local, state and federal building codes. See Appendix.

9. Resale or Recapture Guidelines. Below, the grantee must enter (or attach) a description of the guidelines that will be used for resale or recapture of HTF funds when used to assist first-time homebuyers. If the grantee will not use HTF funds to assist first-time homebuyers, enter "N/A".

N/A

10. HTF Affordable Homeownership Limits. If the grantee intends to use HTF funds for homebuyer assistance and does not use the HTF affordable homeownership limits for the area provided by HUD, it must determine 95 percent of the median area purchase price and set forth the information in accordance with §93.305. If the grantee will not use HTF funds to assist first-time homebuyers, enter "N/A".

The grantee will use the HUD issued affordable homeownership limits.

The grantee has determined its own affordable homeownership limits using the methodology described in § 93.305(a)(2) and the limits are attached.

N/A

11. Grantee Limited Beneficiaries or Preferences. Describe how the grantee will limit the beneficiaries or give preferences to a particular segment of the extremely low- or very low-income population to serve unmet needs identified in its consolidated plan or annual action plan. If the grantee will not limit the beneficiaries or give preferences to a particular segment of the extremely low- or very low-income population, enter "N/A."

Any limitation or preference must not violate nondiscrimination requirements in § 93.350, and the grantee must not limit or give preferences to students. The grantee may permit rental housing owners

to limit tenants or give a preference in accordance with § 93.303(d)(3) only if such limitation or preference is described in the action plan.

The State will not limit beneficiaries and/or give preferences to any segments of the extremely low income population.

12. Refinancing of Existing Debt. Enter or attach the grantee's refinancing guidelines below. The guidelines describe the conditions under which the grantee will refinance existing debt. The grantee's refinancing guidelines must, at minimum, demonstrate that rehabilitation is the primary eligible activity and ensure that this requirement is met by establishing a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing. If the grantee will not refinance existing debt, enter "N/A."

The State will not permit the refinancing of existing debt.

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Appendix A: Fair Housing Plan (Draft)

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Private Sector Impediments

Impediments, Suggested Actions and Objectives	Action(s)	Measurement(s)	Responsible Agencies	Timeline	Cost
<p>1. Discriminatory terms, conditions, privileges or services and facilities in the rental market</p> <p><i>Action 1.1</i> – Continue to educate landlords and property management companies about fair housing law. <i>Objective 1.1</i> – Increase number of outreach and education activities conducted.</p> <p><i>Action 1.2</i> – Continue to educate housing consumers in fair housing rights. <i>Objective 1.2</i> – Increase number of outreach and education activities conducted.</p> <p><i>Action 1.3</i> – Enhance audit and testing activities and document the outcomes of tests <i>Objective 1.3</i> – Increase number of testing activities conducted</p> <p>Priority: High</p>	<p>1.1a – Provide information & training or support the Fair Housing Council to bring information and training on fair housing to developers, property managers and the apartment association.</p> <p>Online training for sub-recipients/grantees of THDA funding & other THDA business associates (HCV landlords, LIHTC developers & property managers, etc.) is posted on the THDA website. This training will be periodically reviewed for revisions/updates.</p> <p>THDA’s Civil Rights Advisor and legal staff are available for agency trainings with sub-recipients/grantees & external partners agencies, such as LIHTC developer workshops.</p> <p>Fair Housing reminders, updates, information is placed on THDA’s website, TNHousingSearch website and/or THDA’s social media sites.</p>	<p>1.1a – Fair housing training for non-profit and for profit developers and apartment managers completed.</p> <p>Sub-recipients reminded about online training and requirements to attend training annually.</p> <p>THDA Division Directors invite THDA Civil Rights Advisor and/or legal staff to participate in routine training or outreach activities.</p> <p>Fair Housing reminders, updates, information are placed on TNHousingSearch website and/or THDA’s social media sites.</p>	<p>THDA</p>	<p>FY 2018-2019 & On going</p>	<p>THDA: \$3,500</p>
	<p>1.1b – Continue to educate THDA staff who work with rental programs and landlords (Section 8 HCV staff) on an annual basis.</p>	<p>1.1b – THDA staff continues training in fair housing issues in the rental market.</p> <p>All THDA employees complete training by June 30, 2019. All new employees complete training and quiz within first 90 days of employment.</p>	<p>THDA</p>	<p>FY 2018-2019</p>	<p>\$2,500</p>
	<p>1.1c – Continue to educate staff on Fair Housing through attendance at the Tennessee Fair Housing Council annual Middle Tennessee conference, West</p>	<p>1.1c – Attendance at fair housing events continues, number of staff trained increases.</p>	<p>THDA, ECD</p>	<p>Annually in April</p>	<p>THDA: \$4,500 ECD: \$1,700</p>

	Tennessee Fair Housing Celebrations (West & Middle) and the ECHO Spring Fair Housing Workshop. Provide support and sponsorship to events and encourage attendance among sub-recipients and partners.	Sponsorship of fair housing meetings continues. Marketing fair housing conferences on Facebook, Twitter and via bulk email mailing lists to enhance attendance among sub-recipients and partners. Continued attendance by THDA staff at regional (West Tennessee Fair Housing Celebration and ECHO Spring Fair Housing Workshop) meetings.			
	1.2a – Continue to give written HUD Fair Housing information to program beneficiaries and monitor sub-recipients to ensure compliance.	1.2a – Fair Housing brochure or written information is given to program beneficiaries; ensured through monitoring.	THDA, DOH, ECD	On-going	THDA: \$500 ECD: \$250 DOH: \$125
	1.2b – Consistently review THDA website fair housing page & make updates as needed; make AI available for review.	1.2b – Fair housing page of website is accessible and updated regularly. AI is available to review through site.	THDA	On-going	\$500
	1.3a – Continue to monitor sub-recipients for compliance with Fair Housing and Equal Opportunity, utilizing Fair Housing and Equal Opportunity checklists.	1.3a – Sub-recipients are monitored for Fair Housing and Equal Opportunity, using checklists.	THDA, ECD, DOH	On-going	THDA: \$1,500 ECD:\$250 DOH: \$125

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<p>2. Discriminatory acts under Section 818 (coercion, etc.)</p> <p><i>Action 2.1</i> – Continue to educate landlords and property management companies about fair housing law <i>Objective 2.1</i> – Increase number of outreach and education activities</p> <p><i>Action 2.2</i> – Continue to educate housing consumers in fair housing rights <i>Objective 2.2</i> – Increase the number of outreach and education activities conducted</p> <p><i>Action 2.3</i> – Enhance audit and testing activities and document the outcomes of tests <i>Objective 2.3</i> – Increase number of testing activities conducted</p>	<p>2.1a – Provide information & training (online or in person) &/or support the Fair Housing Council to bring information and training on fair housing to developers, property managers and the apartment association.</p> <p>Online training for sub-recipients/grantees of THDA funding & other THDA business associates (HCV landlords, LIHTC developers & property managers, etc.) is posted on the THDA website. This training will be periodically reviewed for revisions/updates.</p> <p>THDA’s Civil Rights Advisor and legal staff are available for agency trainings with sub-recipients/grantees & external partners agencies, such as LIHTC developer workshops.</p> <p>Fair Housing reminders, updates, information is placed on THDA’s website, the TNHousingSearch website and/or THDA’s social media sites.</p>	<p>2.1a – Fair housing training for non-profit and for profit developers and apartment managers made available; completion encouraged.</p> <p>Online training module made available.</p> <p>THDA Division Directors invite THDA Civil Rights Advisor and/or legal staff to participate in routine training or outreach activities.</p> <p>Fair Housing reminders, updates, information is placed on TNHousingSearch website and/or THDA’s social media sites.</p>	<p>FY 2018-2019 & On going</p>	<p>On-going</p>	<p>\$2,000</p>
<p><i>Priority: Low</i></p>	<p>2.1b – Continue to educate THDA staff who work with rental programs and landlords (Section 8 HCV staff) on an annual basis.</p> <p>Online training for all THDA staff, including those who work with rental programs, is under development for Title VI and Fair Housing and will be made available by July 1, 2017. Existing employees will complete the training by September 1, 2017, and new employees will complete the training as part of on-boarding activities.</p>	<p>2.1b – THDA staff continues training in fair housing issues in the rental market.</p> <p>All THDA employees complete training by June 30, 2019. All new employees complete training and quiz within first 90 days of employment.</p>	<p>FY 2018-2019 & On-going</p>	<p>On-going</p>	<p>\$2,500</p>
	<p>2.1c – Continue to educate staff on Fair Housing through attendance at Fair Housing Matters Conference and West</p>	<p>2.1c – Attendance at fair housing events by THDA staff continues.</p>	<p>THDA, ECD</p>	<p>Annually in April</p>	<p>THDA: \$4,500 ECD:</p>

	Tennessee Fair Housing Celebration. Provide support and sponsorship to both events and encourage attendance among sub-recipients and partners.	Sponsorship of fair housing meetings continues. Marketing fair housing conferences on Facebook, Twitter and via bulk email mailing lists to enhance attendance among sub-recipients and partners.			\$1,700
	2.2a – Consistently review THDA website fair housing page & make updates as needed; make AI available for review.	2.2a – Fair housing page of website is accessible and updated regularly. AI is available to review through site.	THDA, ECD, DOH	On-going	THDA: \$500 ECD: \$200
	2.2b – Continue to give written HUD Fair Housing information to program beneficiaries and monitor sub-recipients to ensure compliance.	2.2a – Fair Housing brochure or written information is given to program beneficiaries, ensured through monitoring.	THDA, ECD, DOH	On-going	THDA: \$500 ECD: \$250 DOH: \$125
	2.3a – The State will communicate reasonable accommodation testing as a priority to partners engaged in testing which include: the Fair Housing Council, West Tennessee Legal Services, and the Tennessee Human Rights Commission.	2.3a – Priority is communicated to testing organizations.	THDA, ECD, DOH	On-going	THDA: \$25
	2.3b – Continue to monitor sub-recipients for compliance with Fair Housing and Equal Opportunity, utilizing Fair Housing and Equal Opportunity checklists.	2.3b – Sub-recipients are monitored for Fair Housing and Equal Opportunity, using checklists.	THDA, ECD, DOH	On-going	THDA: \$1,500 ECD: \$250 DOH: \$125

3. Failure to make reasonable accommodation and modification <i>Action 3.1 – Enhance audit and testing activities and document the outcomes of tests</i> <i>Objective 3.1 – Increase number of testing activities conducted</i> <i>Action 3.2 – Educate housing providers about requirements</i>	3.1a – The State will communicate reasonable accommodation testing as a priority to partners engaged in testing which include: the Fair Housing Council, West Tennessee Legal Services, and the Tennessee Human Rights Commission.	3.1a – Priority is communicated to testing organizations, testing increases.	THDA, ECD, DOH	On-going	THDA: \$25
	3.1b – Continue to monitor sub-recipients for compliance with Fair Housing and Equal Opportunity, including reasonable accommodation & modification, utilizing Fair Housing and Equal Opportunity checklists.	3.1a – Sub-recipients are monitored for Fair Housing and Equal Opportunity, using checklists.	THDA, ECD, DOH	On-going	THDA: \$1,500 ECD: \$250 DOH: \$125
	3.2a – Continue to educate staff on Fair Housing, including reasonable	3.2a – Attendance at fair housing events continues.	THDA, ECD	Annually in April	THDA: \$4,500 ECD:

<p>for reasonable accommodation or modification</p> <p><i>Objective 3.2 – Increase number of training sessions conducted</i></p> <p>Priority: Medium</p>	<p>accommodation & modification through attendance at Fair Housing Matters Conference, West Tennessee Fair Housing Celebration and the ECHO Spring Fair Housing Workshop. Provide support and sponsorship to both events and encourage attendance among sub-recipients and partners.</p>	<p>Sponsorship of fair housing meetings continues. Marketing fair housing conferences on Facebook, Twitter and via bulk email mailing lists to enhance attendance among sub-recipients and partners.</p>			<p>\$1,700</p>
	<p>3.2b – Support the Fair Housing Council in providing fair housing training for developers, property managers and the apartment association.</p> <p>Online training for sub-recipients/grantees of THDA funding & other THDA business associates (HCV landlords, LIHTC developers & property managers, etc.) is posted on the THDA website. This training will be periodically reviewed for revisions/updates.</p>	<p>3.2b –Fair housing training for non-profit and for profit developers and apartment managers posted online.</p>	<p>THDA</p>	<p>Ongoing</p>	<p>\$1,500</p>
	<p>3.2dc– Continue to educate THDA program staff that work with housing providers and landlords on an annual basis.</p> <p>Online training for all THDA staff, including those who work with rental programs, is available.</p>	<p>3.2c – Training on reasonable accommodation continues as part of annual Fair Housing training.</p> <p>All THDA employees complete online training annually by June 30. All new employees complete training and quiz within first 90 days of employment.</p>	<p>THDA</p>	<p>On-going</p>	<p>\$3,500</p>
	<p>3.2d – Increase training of elected officials and landlords in CDBG grantee communities of fair housing responsibilities.</p> <p>Online training for sub-recipients/grantees of THDA funding & other THDA business associates (HCV landlords, LIHTC developers & property managers, etc.) is posted on the THDA website. This training</p>	<p>3.2d – THDA online training is made available.</p> <p>THDA Civil Rights or legal staff attend local community training to discuss fair housing as requested.</p>	<p>THDA, ECD</p>	<p>FY 2018-19</p>	<p>\$1,500</p>

	<p>will be periodically reviewed for revisions/updates.</p> <p>THDA's Civil Rights Advisor and legal staff are available for agency trainings with sub-recipients/grantees & external partners agencies, such as LIHTC developer workshops.</p>				
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<p>4. Discriminatory patterns in home purchase loan denials</p> <p><i>Action 4.1 – Educate buyers through credit counseling and home purchase training</i> <i>Objective 4.1 – Increase number of outreach and education activities conducted</i></p> <p><i>Action 4.2 – Educate lenders and make developers aware of the counseling and training</i> <i>Objective 4.2 – Increase number of outreach and education activities conducted</i></p> <p><i>Priority: Low</i></p>	<p>4.1a – Continue homebuyer education courses (with fair housing components in the curriculum) for THDA loan programs (required for Great Choice Plus; Homeownership for the Brave and HOME). Continue to support the Homebuyer Education Initiative (HBEI) across the state for homebuyers not utilizing a THDA loan product.</p> <p>THDA HBEI program includes 3 HUD certified counselors to focus on foreclosure prevention & delinquency.</p>	<p>4.1a – Homebuyer education classes are conducted, program continued and marketed serving THDA borrowers and non-THDA borrowers (depending on demand).</p> <p>HUD certified counselors assist THDA low/moderate income buyers with foreclosure and delinquency prevention.</p>	THDA	FY2018-2019 & Ongoing	\$350,000
	<p>4.1b – Continue to support and train HBEI agencies through provision of NeighborWorks America course curriculum materials and training.</p>	<p>4.1b – Deliver NeighborWorks American materials to HBEI agencies annually in March.</p>	THDA	On-going	\$5,000
	<p>4.1c – Continue “Training the Trainer” to certify new Homebuyer Education Trainers throughout the state and continuing education sessions (Peer Sessions) for certified Homebuyer Education Trainers.</p>	<p>4.1c – “Training the Trainer” and Peer Sessions conducted annually in July.</p>	THDA	On-going	\$3,500
	<p>4.1d – Continue marketing and outreach on Homebuyer Education Initiative on THDA website.</p> <p>Continue Step-in program, which targets state employees for THDA mortgage programs.</p>	<p>4.1d – Website updated, new outreach activities identified.</p> <p>Increase the number of state employees securing THDA mortgage through the Step-in Program.</p>	THDA	FY 2016-2017 & ongoing	\$50,000

	4.1e – Explore analyzing counseling agency data that is collected to provide agencies feedback to improve program performance.	4.1e – Decision to analyze data is made, analysis completed annually and reported to agencies at HBEI Peer Sessions.	THDA	FY 2016-17 & ongoing	\$500
	4.1f – Continue to find new and improved ways to educate buyers and improve financial literacy through the operation of the Housing Education Advisory Board.	4.1f – Quarterly meetings of the advisory boards continue.	THDA	On-going	\$500
	4.2 – Invite lenders and developers to the Governor’s Housing Conference, which includes fair housing training and education.	4.2 – Include annual fair housing training and invite lenders and developers to the Governor’s Housing Conference.	THDA	On-going	\$1,000

<p>5. Discriminatory patterns in predatory lending</p> <p><i>Action 5.1 – Educate buyers through credit counseling and home purchase training</i> <i>Objective 5.1 – Increase number of outreach and education activities conducted</i></p> <p><i>Action 5.2 – Educate lenders and developers’ counseling and training</i> <i>Objective 5.2 – Increase number of outreach and education activities conducted</i></p> <p><i>Priority: Low</i></p>	5.1a – Continue homebuyer education courses (with fair housing components in the curriculum) for THDA loan programs (required for Great Choice Plus; Homeownership for the Brave and HOME). Continue to support the Homebuyer Education Initiative (HBEI) across the state for homebuyers not utilizing a THDA loan product.	5.1a – Homebuyer education classes are conducted, program continued and marketed serving THDA borrowers and non-THDA borrowers (depending on demand). HUD certified counselors work across the state to assist THDA low/moderate income buyers with foreclosure and delinquency prevention.	THDA	FY2018-2019 &	\$350,000
	THDA HBEI program includes 3 HUD certified counselors to focus on foreclosure prevention & delinquency.				
	5.1b – Continue to support and train HBEI agencies through provision of NeighborWorks America course curriculum materials and training.	5.1b – Deliver NeighborWorks American materials to HBEI agencies, annually in March.	THDA	On-going	\$5,000
	5.1c – Continue “Training the Trainer” to certify new Homebuyer Education Trainers throughout the state and continuing education sessions (Peer Sessions) for certified Homebuyer Education Trainers	5.1c – “Training the Trainer” and Peer Sessions conducted annually in July.	THDA	On-going	\$3,500
	5.1d – Continue marketing and outreach on Homebuyer Education Initiative on THDA website. Explore new ways to market homebuyer education and credit counseling.	5.1d – Website updated, new outreach activities identified including development of a new on-line Homebuyer Education portal.	THDA	On-going	\$50,000

	5.1e – Explore analyzing counseling agency data that is collected to provide agencies feedback to improve program performance.	5.1e– Decision to analyze data is made, analysis completed and reported annually to agencies at HBEI Peer Sessions.	THDA	Ongoing	\$500
	5.2 – Invite lenders and developers to the Governor’s Housing Conference, which includes fair housing training and education.	5.2 – Include annual fair housing training and invite lenders and developers to the Governor’s Housing Conference.	THDA	On-going	\$1,000
<p>6. Lack of sufficient education about fair housing law</p> <p><i>Action 6.1</i> – Have the THRC develop a core outreach and education curriculum, with the assistance of other organizations that provide fair housing services, in Tennessee</p> <p><i>Objective 6.1</i> – Track the consistency in fair housing messaging throughout the State of Tennessee.</p> <p><i>Action 6.2</i> – Educate the public and housing stakeholders about fair housing law and rights of housing consumers</p> <p><i>Objective 6.2</i> – Increase number of outreach and education activities conducted</p> <p><i>Action 6.3</i> – Enhance documentation of fair housing activities conducted throughout the State</p> <p><i>Objective 6.3</i> – Request that the THRC provide such</p>	6.1 – Discuss with the Tennessee Human Rights Commission opportunities to develop an outreach and education curriculum on fair housing with other organizations in the state that provide fair housing services.	6.1 – Discuss this opportunity with Tennessee Human Rights Commission.	THDA	Ongoing	No cost
	6.2a – Provide information & training (online or in person) &/or support the Fair Housing Council to bring information and training on fair housing to sub-recipients/grantees with an emphasis on duty to affirmatively further fair housing, raising citizen awareness of fair housing law, discrimination in rental, ramifications of failure to make reasonable accommodation, codes, zoning and other priority areas.	6.2a – THDA online training module made available and sub-recipients and other business associates notified. Training provided at Grantee & LIHTC workshops as requested. THDA added Language Translation and Interpretation Access Services to the projects allowed under THDA technical assistance grants for the Development Districts in the 2017-2018 grant year.	THDA, ECD	On-going	THDA: \$3,500 (cost may be higher if Development Districts use technical assistance grants for language assistance) ECD: \$1,000
	Online training for THDA employees, sub-recipients/grantees of THDA funding & other THDA business associates (HCV landlords, LIHTC developers & property managers, etc.) is posted on the THDA website. This training will be periodically reviewed for revisions/updates.				
	Fair Housing reminders, updates, information is placed on TNHousingSearch website and/or THDA’s social media sites.				
	6.2b – Implement training for elected officials as part of grant requirements for CDBG grantees.	6.2b – THDA sub-recipient online training is made available. CDBG grantees notified of training.	THDA, ECD	FY 2018-19	THDA: \$1,500 ECD: \$500

<p>documentation for all activities conducted under the auspices of the core curriculum</p> <p><i>Priority: High</i></p>	<p>Online training for sub-recipients/grantees of THDA funding & other THDA business associates (HCV landlords, LIHTC developers & property managers, etc.) is posted on the THDA website. This training will be periodically reviewed for revisions/updates.</p>				
	<p>6.2d – Consistently review THDA website fair housing page & make updates as needed; make AI available for review.</p>	<p>6.2d – Fair housing page of website is accessible and updated regularly. AI is available to review through site.</p>	<p>THDA, ECD, DOH</p>	<p>On-going</p>	<p>THDA: \$500 ECD: \$200</p>
	<p>6.2e – Explore working with THDA Advisory Boards (Housing Industry, Housing Education, and Energy Efficiency and Weatherization) to seek input and identify ways to increase educational opportunities for housing stakeholders and the public on fair housing issues in the private sector.</p>	<p>6.2e – THDA Civil Rights Advisor attends Advisory Board meetings, describes need for educational opportunities or conducts Fair Housing presentations and seeks input.</p>	<p>THDA</p>	<p>On-going</p>	<p>\$250</p>
	<p>6.2f – Explore opportunities for THDA’s Connect Team to educate housing stakeholders of their duty to AFFH, fair housing law and rights of housing consumers.</p>	<p>6.2f – Discuss opportunities and ideas with Outreach Team and conduct annual meeting to revisit efforts.</p>	<p>THDA</p>	<p>On-going</p>	<p>\$500</p>
	<p>6.2g – Continue training for HOPWA Program Sponsors at annual network meeting and monitor for compliance during monitoring interviews.</p>	<p>6.2g – Training and monitoring continues.</p>	<p>DOH</p>	<p>On-going</p>	<p>\$1,500</p>
	<p>6.3 – Discuss with Tennessee Human Rights Commission opportunities to enhance the documentation of fair housing activities.</p>	<p>6.3 – Contact THRC to discuss documentation opportunities.</p>	<p>THDA</p>	<p>Ongoing</p>	<p>No cost</p>

Public Sector Impediments

Impediment/Suggested Action/Objective	Action(s)	Measurement(s)	Responsible Agencies	Timeline	Cost
<p>1. Lack of local fair housing ordinances or policies</p> <p><i>Action 1.1</i> – Create template fair housing ordinance, resolution, policy or other commitment to AFFH</p> <p><i>Objective 1.1</i> – Present policy to all prospective grantees</p> <p><i>Action 1.2</i> – Educate local government staff about fair housing regulations and the statewide commitment to AFFH</p> <p><i>Objective 1.2</i> – Increase number of education activities</p> <p><i>Action 1.3</i> – Increase monitoring and enforcement policies that affirmatively further fair housing choice</p> <p><i>Objective 1.3</i> – Increase number of monitoring and enforcement activities</p> <p><i>Priority: High</i></p>	<p>1.1a – Explore opportunities to work with fair housing partners and local/county government associations, including West Tennessee Legal Services and the Fair Housing Council, to develop policies to provide to local governments and sub-recipients.</p>	<p>1.1a – Partnership established and policy completed.</p>	<p>ECD, THDA</p>	<p>Ongoing</p>	<p>THDA: \$5,000 ECD: \$800</p>
	<p>1.1b – Explore partnerships with the other state, county and local organizations, including the Tennessee Advisory Commission on Intergovernmental Relations (TACIR) and Tennessee’s Development Districts to determine best way to reach local governments and present policy.</p>	<p>1.1b – Establish partnership and determine best method for information delivery.</p>	<p>ECD, THDA</p>	<p>Ongoing</p>	<p>THDA: \$1,000 ECD: \$800</p>
	<p>1.1c – After development of Fair Housing materials, present to grantees and local governments within jurisdiction.</p>	<p>1.1c – Deliver materials to grantees, as well as local governments within the state’s jurisdictions.</p>	<p>ECD, THDA</p>	<p>Ongoing</p>	<p>THDA: \$500 ECD: \$400</p>
	<p>1.2a – Continue to educate local government staff and sub-recipients by contracting with the Tennessee Fair Housing Council or utilizing THDA’s Civil Rights Advisor and legal staff fair housing training at grantee workshops, with an emphasis on duty to affirmatively further fair housing, raising citizen awareness of fair housing law, discrimination in rental, the ramifications of a failure to make reasonable accommodation, codes, zoning and other priority areas. Continue to publish ECD notices and promote participation at fair housing events and trainings.</p> <p>Online training for sub-recipients/grantees of THDA funding & other THDA business associates (HCV landlords, LIHTC</p>	<p>1.2a – Grantees trained in fair housing at grantee workshops.</p> <p>Online training is made available & sub-recipients are notified.</p>	<p>THDA, ECD</p>	<p>FY 2018-2019 & On-going</p>	<p>THDA: \$1,500 ECD: \$400</p>

	<p>developers & property managers, etc.) is posted on the THDA website. This training will be periodically reviewed for revisions/updates.</p>				
	<p>1.2b – Explore providing state-wide fair housing trainings or forums with local government officials, housing stakeholders and citizens, that focus on fair housing law, affirmatively furthering fair housing, impediments to fair housing in Tennessee and local actions to overcome impediments.</p> <p>Online training for sub-recipients/grantees of THDA funding & other THDA business associates (HCV landlords, LIHTC developers & property managers, etc.) is posted on the THDA website. This training will be periodically reviewed for revisions/updates.</p>	<p>1.2b – Fair housing training made available statewide.</p> <p>Online training made available. THDA Civil Rights Advisor or legal team is made available for trainings or forums; Tennessee Fair Housing Council or other local fair housing organization is contracted as needed.</p>	ECD, THDA, DOH	On-going	THDA: \$1,500 ECD: \$400
	<p>1.3a – Continue to monitor grant programs for compliance with fair housing and equal opportunity, utilizing fair housing and equal opportunity checklists.</p>	<p>1.3a – Programs are monitored for activity and compliance consistent with information required in checklists.</p>	THDA, ECD, DOH	On-going	THDA: \$1,500 ECD: \$250 DOH: \$125
<p>2. Insufficient establishment and enforcement of building codes regarding special needs housing</p>	<p>2.1a – Incorporate Medicaid Home and Community Based Service Settings rule in special needs housing project priorities in THDA Housing Trust Fund program.</p>	<p>2.1a – HCBS Settings rule incorporated into Trust Fund Program.</p>	ECD, THDA	FY 2016-17	THDA: \$1,000 ECD: \$800
<p><i>Action 2.1 – Create examples of building code policies that sufficiently provide for special needs housing such as group homes and accessible housing</i></p>	<p>2.1b – Explore partnerships with state, county and local government stakeholders, such the Tennessee Advisory Commission on Intergovernmental Relations (TACIIR) and Tennessee’s Development Districts to determine best way to reach local governments and present examples of Fair Housing policy related to special needs & accessible housing.</p>	<p>2.1b – Establish partnership and determine best method for information delivery.</p>	ECD, THDA	FY 2017-18	THDA: \$1,000 ECD: \$800

<p><i>Objective 2.1 – Present examples to all prospective grantees</i></p>	<p>2.1c – After development of Fair Housing materials, present to grantees and local governments within jurisdiction.</p>	<p>2.1c – Deliver materials to grantees, as well as local governments within the state’s jurisdictions.</p>	<p>ECD, THDA</p>	<p>FY 2017-18</p>	<p>THDA: \$500 ECD: \$400</p>
<p><i>Action 2.2 – Educate local government staff about fair housing regulations and the statewide commitment to AFFH</i> <i>Objective 2.2 – Increase number of education activities conducted</i></p> <p><i>Action 2.3 – Increase monitoring and enforcement of building codes of jurisdictions across the state</i> <i>Objective 2.3 – Increase number of monitoring and enforcement activities</i></p> <p><i>Priority: Medium</i></p>	<p>2.2a – Continue to educate local government staff and sub-recipients by contracting with the Tennessee Fair Housing Council or utilizing THDA’s Civil Rights Advisor and legal staff fair housing training at grantee workshops, with an emphasis on duty to affirmatively further fair housing, raising citizen awareness of fair housing law, discrimination in rental, the ramifications of a failure to make reasonable accommodation, codes, zoning and other priority areas. Continue to publish ECD notices and promote participation at fair housing events and trainings.</p> <p>Online training for sub-recipients/grantees of THDA funding & other THDA business associates (HCV landlords, LIHTC developers & property managers, etc.) is posted on the THDA website. This training will be periodically reviewed for revisions/updates.</p>	<p>2.2a – – Grantees trained in fair housing at grantee workshops.</p> <p>Online training is made available & sub-recipients are notified.</p>	<p>THDA, ECD</p>	<p>On-going</p>	<p>THDA: \$1,500 ECD: \$400</p>
	<p>2.2b Explore providing state-wide fair housing trainings or forums with local government officials, housing stakeholders and citizens, that focus on fair housing law, affirmatively furthering fair housing, impediments to fair housing in Tennessee and local actions to overcome impediments.</p> <p>Online training for sub-recipients/grantees of THDA funding & other THDA business associates (HCV landlords, LIHTC developers & property managers, etc.) is posted on the THDA website. This training</p>	<p>2.2b – – Online training made available. THDA Civil Rights Advisor or legal team is made available for trainings or forums; Tennessee Fair Housing Council or other local fair housing organization is contracted as needed.</p>	<p>ECD, THDA</p>	<p>On-going</p>	<p>THDA: \$1,500 ECD: \$400</p>

	will be periodically reviewed for revisions/updates.				
	2.2c – Present AI findings at Governor’s Housing Summit, which is attended by housing stakeholders, citizens and local government officials.	2.2c – Findings are presented.	ECD, THDA	Completed	THDA: \$1,000 ECD: No cost
	2.2d – Encourage and promote THDA’s accessibility and visitability program, which is a voluntary certification program created by the TN Council on Developmental Disabilities that encourages builders (single family and multi-family) to voluntarily implement design features that make homes accessible, visitable and convenient for everyone.	2.2d – Visitability standards are included as part of our scoring criteria under HOME, HTF Competitive Grants Program and the LIHTC Qualified Allocation Plan for both new construction and rehab projects. Knowledge of visitability increases through education, builders voluntarily implement features.	THDA	FY2017-2018 & ongoing	THDA: \$24,678
	2.3a – Continue to monitor grant programs for compliance with fair housing and equal opportunity, utilizing fair housing and equal opportunity checklists.	2.3a – Programs are monitored for activity and compliance consistent with information required in checklists.	THDA, ECD, DOH	On-going	THDA: \$500 ECD: \$250 DOH: \$125
<p>3. Lack of local government understanding of duties of AFFH</p> <p><i>Action 3.1 – Educate local government staff about fair housing law and federal formula grant funding requirements to affirmatively further fair housing</i></p> <p><i>Objective 3.1 – Increase number of educational activities conducted</i></p> <p><i>Priority: High</i></p>	<p>3.1a – Continue to educate local government staff and sub-recipients by contracting with the Tennessee Fair Housing Council or other fair housing education providers to conduct fair housing training at grantee workshops, with an emphasis on duty to affirmatively further fair housing, raising citizen awareness of fair housing law, discrimination in rental, ramifications of a failure to make reasonable accommodation, codes, zoning and other priority areas. Continue to publish ECD notices and promote participation at fair housing events and trainings.</p> <p>Online training for sub-recipients/grantees of THDA funding & other THDA business associates (HCV landlords, LIHTC</p>	<p>3.1a – Grantees trained in fair housing at grantee workshops, ECD notices regarding fair housing increased, and attendance at fair housing events increases.</p> <p>Online training made available. THDA Civil Rights Advisor or legal team is made available for trainings or forums; Tennessee Fair Housing Council or other local fair housing organization is contracted as needed.</p>	ECD, THDA	On-going	THDA: \$1,500 ECD: \$400

	<p>developers & property managers, etc.) is posted on the THDA website. This training will be periodically reviewed for revisions/updates.</p>				
	<p>3.1b – Explore providing state-wide fair housing trainings or forums with local government officials, housing stakeholders and citizens, that focus on fair housing law, affirmatively furthering fair housing, impediments to fair housing in Tennessee and local actions to overcome impediments.</p> <p>Online training for sub-recipients/grantees of THDA funding & other THDA business associates (HCV landlords, LIHTC developers & property managers, etc.) is posted on the THDA website. This training will be periodically reviewed for revisions/updates.</p>	<p>3.1b – Online training made available. THDA Civil Rights Advisor or legal team is made available for trainings or forums; Tennessee Fair Housing Council or other local fair housing organization is contracted as needed.</p>	ECD, THDA, DOH	On-going	ECD: \$400
	<p>3.1c - Present AI findings at Governor's Housing Summit, which is attended by housing stakeholders, citizens and local government officials.</p>	<p>3.1c – Findings are presented.</p>	ECD, THDA	Completed October 2013	THDA: \$1,000 ECD: No cost
	<p>3.1d – Explore partnerships with state, county and local government stakeholders, such the Tennessee Advisory Commission on Intergovernmental Relations (TACIIR) and Tennessee's Development Districts to determine best way to reach local governments and present examples of Fair Housing policy.</p>	<p>3.1d – Establish partnership and determine best method for information delivery.</p>	ECD, THDA		THDA: \$1,000 ECD: \$800
	<p>3.1e – Fair Housing module for sub-recipients/grantees, including CDBG & HOME sub-recipients, and stakeholders in the community is online. Continue compliance monitoring and increase reporting on fair housing activities, including a Title VI/Fair Housing self-</p>	<p>3.1e – Online training made available. Sub-recipient monitoring continues with self-assessment form added to compliance monitoring.</p>	ECD, THDA	FY2018-2019	THDA: \$2,000 ECD: \$800

	assessment that includes the amount spent on the activities in local communities.				
	3.1f – Encourage local elected officials to complete THDA online Title VI/Fair Housing training as a CDBG Fair Housing Activity.	3.1f – Local elected officials notified of availability of online training.	ECD	FY 2016-17	THDA: \$1,500 ECD: \$150
<p>4. Lack of uniformity of codes and land use policies</p> <p><i>Action 4.1 – Create examples of codes and land use policies that are in the spirit of AFFH</i> <i>Objective 4.1 – Present examples to all prospective grantees</i></p> <p><i>Action 4.2 – Educate local government staff about fair housing regulations and the statewide commitment to AFFH</i> <i>Objective 4.2 – Increase number of education activities conducted</i></p> <p><i>Action 4.3 – Increase monitoring and enforcement of policies that affirmatively further fair housing choice</i> <i>Objective 4.3 – Increase number of monitoring and enforcement activities conducted</i></p> <p><i>Priority: Medium</i></p>	<p>4.1a – Explore opportunities to work with fair housing partners, including West Tennessee Legal Services and the Tennessee Fair Housing Council, and local/county government associations to develop examples of codes and land use policies to provide examples of Fair Housing policy related to codes & land use policies to local governments and sub-recipients.</p> <p>Online training for sub-recipients/grantees of THDA funding & other THDA business associates (HCV landlords, LIHTC developers & property managers, etc.) is posted on the THDA website. This training will be periodically reviewed for revisions/updates.</p>	<p>4.1a – Online training made available. THDA Civil Rights Advisor or legal team is made available for trainings or forums; Tennessee Fair Housing Council or other local fair housing organization is contracted as needed.</p>	ECD, THDA	On-going	THDA: \$1,500 ECD: \$800
	<p>4.1b – Explore partnership with the Tennessee Advisory Commission on Intergovernmental Relations and Tennessee’s Development Districts to determine best way to reach local governments and present examples of Fair Housing policy related to codes & land use policies.</p>	<p>4.1b – Establish partnership and determine best method for information delivery.</p>	ECD, THDA	Ongoing	THDA: \$1,000 ECD: \$800
	<p>4.2a – Continue to educate local government staff and sub-recipients by contracting with the Tennessee Fair Housing Council or other fair housing education providers to conduct fair housing training at grantee workshops, with an emphasis on duty to affirmatively further fair housing, raising citizen awareness of fair housing law, discrimination in rental,</p>	<p>4.2a – Grantees trained in fair housing at grantee workshops or through THDA online training, ECD notices regarding fair housing increased, and attendance at fair housing events increases.</p>	ECD, THDA	On-going	THDA: \$1,500 ECD: \$400

	<p>ramifications of a failure to make reasonable accommodation, codes, zoning and other priority areas.</p> <p>Online training for sub-recipients/grantees of THDA funding & other THDA business associates (HCV landlords, LIHTC developers & property managers, etc.) is posted on the THDA website. This training will be periodically reviewed for revisions/updates.</p> <p>Continue to publish ECD notices and promote participation at fair housing events and trainings.</p>				
	<p>4.2b – Explore providing state-wide fair housing trainings or forums with local government officials, housing stakeholders and citizens, that focus on fair housing law, affirmatively furthering fair housing, impediments to fair housing in Tennessee and local actions to overcome impediments.</p> <p>Online training for sub-recipients/grantees of THDA funding & other THDA business associates (HCV landlords, LIHTC developers & property managers, etc.) is posted on the THDA website. This training will be periodically reviewed for revisions/updates.</p>	<p>4.2b –Encourage attendance by grantees at Fair Housing Matters Conference and West TN Fair Housing Conference.</p> <p>Encourage local elected officials to complete THDA online Title VI/Fair Housing training.</p>	ECD, THDA	On-going	THDA: \$1,500 ECD: \$400
	<p>4.2c - Present AI findings at Governor’s Housing Summit, which is attended by housing stakeholders, citizens and local government officials.</p>	<p>4.2c – Findings are presented.</p>	ECD, THDA	Completed October 2013	THDA: \$1,000 ECD: No cost
	<p>4.3a – Continue to monitor grant programs for compliance with fair housing and equal opportunity, utilizing fair housing and equal opportunity checklists.</p>	<p>4.3a – Programs are monitored for activity and compliance consistent with information required in checklists.</p>	ECD, THDA	On-going	THDA: \$1,500 ECD: \$250 DOH: \$125

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