

METROPOLITAN NASHVILLE-DAVIDSON COUNTY, TENNESSEE

**2023 - 2024 CONSOLIDATED ANNUAL
PERFORMANCE AND EVALUATION REPORT
(CAPER)**

FOR

**PROGRAM YEAR ONE OF THE
2023-2028 CONSOLIDATED PLAN**

AND

2023 ANNUAL ACTION PLAN

For the period June 1, 2023 – May 31, 2024

Prepared by:

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On behalf of:

The Metropolitan Government of Nashville-Davidson County

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CR-05 - Goals and Outcomes

Progress the jurisdiction has made in carrying out its strategic plan and its action plan. 91.520(a) this could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.

During the 2023 Program Year (PY) (Year 1 of the 2023-2028 Consolidated Plan), MDHA made progress in executing the initiatives and programs identified in the Five-Year Plan. The primary focus was to provide housing opportunities to Nashville's most vulnerable populations and underserved areas and to preserve housing. Highlights include the preservation of 178 units of existing affordable housing through several home rehabilitation activities and the creation of 36 new rental units for households with incomes $\leq 60\%$ of the area median income (AMI) and 14 new homeownership units for households with incomes $\leq 80\%$ of the AMI.

Homeless assistance programs were aimed at providing permanent housing through rapid re-housing (324 people/ 97 households assisted) and prevention (126 people assisted) activities as well as supporting emergency shelters (1,688 people assisted) and street outreach (604 people assisted) efforts. Four public facility improvement projects were underway in PY 2023. Details of accomplishments during the 2023 PY are provided throughout the Report and are summarized in Appendix D.

Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g)

Categories, priority levels, funding sources and amounts, outcomes/objectives, goal outcome indicators, units of measure, targets, actual outcomes/outputs, and percentage completed for each of the grantee's program year goals.

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Affordable Housing Preservation	Affordable Housing Non-Housing Community Development	CDBG: \$2,635,015	Rental units rehabilitated	Household Housing Unit	10	1	10.00%	2	1	50.00%
Affordable Housing Preservation	Affordable Housing Non-Housing Community Development	CDBG: \$2,635,015	Homeowner Housing Rehabilitated	Household Housing Unit	400	177	44.00%	80	177	2.21%
1.* Essential Services for LMI and Vulnerable People	Public Housing Non-Housing Community Development	CDBG: \$1,384,414	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	8500	2027	24.00%	1700	2027	1.19%
Neighborhood Revitalization	Non-Housing Community Development	CDBG: \$1,042,335	Other	Other	9	4	44.00%	1	4	400.00%

New Affordable Housing Opportunities	Affordable Housing Non-Housing Community Development	HOME: \$3,146,573	Rental units constructed	Household Housing Unit	200	36	18.00%	20	36	1.80%
New Affordable Housing Opportunities	Affordable Housing Non-Housing Community Development	HOME: \$3,146,573	Homeowner Housing Added	Household Housing Unit	40	14	35.00%	8	14	1.75%
Support for Homeless & Persons with HIV/AIDS	Homeless Non-Homeless Special Needs	HOPWA: \$2,389,060/ ESG: \$445,903	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	1625	324	19.94%	325	324	99.69%
2.* Support for Homeless & Persons with HIV/AIDS	Homeless Non-Homeless Special Needs	HOPWA: \$2,389,060 / ESG: \$445,903	Homeless Person Overnight Shelter	Persons Assisted	10000	1688	16.88%	2000	1,688	84.40%
Support for Homeless & Persons with HIV/AIDS	Homeless Non-Homeless Special Needs	HOPWA: \$2,389,060 / ESG: \$445,903	Homelessness Prevention	Persons Assisted	875	126	14.40%	175	126	72.00%
3.* Support for Homeless & Persons with HIV/AIDS	Homeless Non-Homeless Special Needs	HOPWA: \$2,389,060 / ESG: \$445,903	HIV/AIDS Housing Operations	Household Housing Unit	1820	231	12.69%	364	231	63.46%

4.*Support for Homeless & Persons with HIV/AIDS	Homeless Non-Homeless Special Needs	HOPWA: \$2,389,060 / ESG: \$445,903	Other	Other	10625	3425	32.24%	2125	3425	161.18%
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Table 1 - Accomplishments – Program Year & Strategic Plan to Date

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1. *Essential Services for LMI and Vulnerable People – This includes Services for the Homeless and VASH Clients – 366; Employee Services – 82; Rental Counseling Services – 60; Fair Housing Services – 23; and Summer Youth participants – 1496.*
2. *Support for Homeless and Persons with HIV/AIDS – Homeless Persons Overnight Shelter: Includes numbers for shelter and essential services.*
3. *Support for Homeless & Persons with HIV/AIDS – Housing Operations: The breakdown for all HOPWA housing accomplishments is as follows: HOPWA STRMU – 163; PBRA – 49; TBRA -7; Transitional/Short-Term- 12.*
4. *Support for Homeless & Persons with HIV/AIDS – Other: The breakdown for “Other” accomplishments is as follows: HOPWA Permanent Housing Placement -60, Supportive Services – 2,761, ESG Outreach – 604.*
5. *Not listed on table was the completion of the Microenterprise program that served 112 persons in PY 2023.*
6. *Additionally, CDBG-CV funds served the following: Support Services for RRH clients – 633; Acquisition and Rehab of Multifamily Housing – 8 units.*
7. *Total \$ for all programs include Administrative funds as these are not included in a separate Goal for the 2023-2028 Consolidated Plan.*

******MDHA also administers the Weatherization Assistance Program (WAP) and the Low-Income Energy Assistance Program (LIHEAP) in Davidson County. These programs operate in tandem. Funding passes from the Departments of Energy (DOE) and Health and Human Services (HHS), respectively, through the Tennessee Housing Development Agency (THDA), to local agencies, such as MDHA. MDHA received a total WAP award of \$532,487.00 to serve 41 households from July 1, 2023, thru June 30, 2024. MDHA also received a total LIHEAP award of \$563,841.87 during the period of September 1, 2023, through August 1, 2024. For eligible residents, CDBG funds were used to accompany Weatherization measures. \$37,300.00 CDBG funds have been used to assist 8 out of the 22 homes served thus far.*

Assess how the jurisdiction’s use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the plan, giving special attention to the highest priority activities identified.

The 2023-2028 Plan identified the following seven (7) priorities:

1. Construct New Affordable Housing.
2. Address Housing Barriers.
3. Retain Affordable Housing Stock.
4. Maintain Housing Stability.
5. Assist Homeless Persons & Persons with HIV/AIDS.
6. Support Services that Provide Stability.
7. Invest in Underserved Areas.

Undertake grant management, planning, and other eligible administrative tasks under CDBG, HOME, ESG, and HOPWA.

- CDBG Funds – addressed priorities 2, 3, 4, 6 and 7 identified in the 2023-2028 Consolidated Plan.
- HOME Funds – addressed priority numbers 1.
- ESG Funds – addressed priority 5 and .6
- HOPWA Funds – addressed priority 5.

CR-10 - Racial and Ethnic composition of families assisted

Describe the families assisted (including the racial and ethnic status of families assisted). 91.520(a)

	CDBG	HOME	HOPWA	ESG
White	1058	17	1089	993
Black or African American	2018	18	1,349	1,431
Asian	89	0	31	15
American Indian or American Native	24	0	5	55
Native Hawaiian or Other Pacific Islander	2	0	1	14
*Other (see Narrative below)	396	1	286	234
Total	3,587	36	2,761	2,742

**Hispanic	217	0	229	239
Not Hispanic	3,370	36	2,532	2,503

Table 2 – Table of assistance to racial and ethnic populations by source of funds

***Narrative**

Racial and ethnic data for CDBG beneficiaries was taken from the CDBG PR-03 and PR-23 reports because the numbers populated by the system did not appear accurate. Per the CAPER instructions, in the Consolidated Plan Desk Guide, May 2018, the data reported is for persons and families even though the table states “families assisted”. The # of persons represents 185 total households with the following make-up: 45 White; 132 Black/African American; 2 Black/African American and White; 2 Asian; and 4 other multi-racial. Based on the PR-03, “Other” listed in the table above reflects additional persons/families that benefited from CDBG activities in the following racial and ethnic categories that are not otherwise provided in the table: 31 - American Indian/Alaskan Native & White; 1 – Asian and White; 83 – Black/African American & White; 9 – American Indian/Alaskan Native & Black; and 272 – other multi-racial.

Racial and ethnic data for HOME beneficiaries was taken from the HOME PR-23 report and reflect the beneficiary data of occupied units.

Racial and ethnic data for beneficiaries assisted with HOPWA funds come from the HOPWA CAPER, which will be submitted in August 2023. HOPWA “Other” represents 20 Black/African American and White; 4 American Indian/Alaskan Native and White; 2 Asian and White; and 260 Other Multi-racial.

Racial and ethnic data for beneficiaries assisted with ESG funds come from the CAPER SAGE data. ESG “Other” represents 2 AI/AN & Black/AA; 15 AI/AN & White; 3 Black/AA & Asian; 1 White & Asian; 6 NI/PH & Black/AA; 51 Black/AA & White; 90 Multiracial/Other.

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Source of Funds	Source	Expected Amount Available	Actual Amount Expended Program Year 2023
CDBG	public – federal	5,131,185	10,087,276.94
HOME	public - federal	3,146,573	4,146,417.98
HOPWA	public - federal	2,389,060	1,765,688.63
ESG	public - federal	455,903	563,569.31

Table 3 – Resources Made Available

Narrative

ESG, and HOPWA – no data populated in IDIS so expenditure amounts were taken from the PR-05. HOME total data taken from PR-05. CDBG total data taken from PR-26.

Additionally, \$207,080.80 was expended from CDBG-CV funds, \$448,450.98 from ESG-CV funds, and \$42,681.53 from HOPWA-CV funds during PY 2023. CDBG-CV, ESG-CV and HOPWA-CV totals taken from PR-05 reports for CARES funds only.

****MDHA also administers the Weatherization Assistance Program (WAP) and the Low-Income Energy Assistance Program (LIHEAP) in Davidson County. These programs operate in tandem. Funding passes from the Departments of Energy (DOE) and Health and Human Services (HHS), respectively, through the Tennessee Housing Development Agency (THDA), to local agencies, such as MDHA. MDHA received a total WAP award of \$532,487.00 to serve 41 households from July 1, 2023, thru June 30, 2024. MDHA also received a total LIHEAP award of \$563,841.87 during the period of September 1, 2023, through August 1, 2024. For eligible residents, CDBG funds were used to accompany Weatherization measures. \$37,300 CDBG funds have been used to assist 8 out of the 22 homes served thus far.*

Identify the geographic distribution and location of investments

For PY 2023, Nashville-Davidson County used a Countywide geographic distribution of funds for the CDBG, ESG, and HOME programs.

For HOPWA programs, the Nashville-Davidson – Murfreesboro-Franklin Metropolitan Statistical Area (MSA), comprised of Cannon, Cheatham, Davidson,

Dickson, Macon, Robertson, Rutherford, Smith, Sumner, Trousdale, Williamson, and Wilson Counties, was utilized.

Leveraging

Explain how federal funds leveraged additional resources (private, state and local funds), including a description of how matching requirements were satisfied, as well as how any publicly owned land or property located within the jurisdiction that were used to address the needs identified in the plan.

MDHA attempts to use federal funds to leverage additional resources in several ways. Except for homeowner rehab assistance, applications for funding should demonstrate the ability to leverage funds. This is part of the Financial Capacity evaluation criteria used in requests for applications/proposals. MDHA's grant writer researches Federal, state, local, and private funding opportunities to apply for funds that further MDHA's mission based on the priorities established in the Consolidated Plan and Public Housing Plan. To leverage HOME dollars, MDHA continues efforts to fund projects that leverage other resources for affordable housing development. For example, recently funded projects leveraged funds from U.S. HUD/SHOP Grant. Additionally, the Barnes Fund, Metro's local Housing Trust Fund, makes funds available that are used to leverage HOME dollars. Another opportunity to leverage HOME funds is with Low Income Housing Tax Credits (LIHTC). MDHA actively pursues other funding opportunities to leverage HOME and CDBG funds to create affordable housing through the Community Reinvestment Act (CRA), HUD-insured loans, the Rental Assistance Demonstration (RAD) program, and the State Housing Trust Fund (HFT). Where appropriate, leverage may be achieved through supportive services provided by partners. As a result of these efforts, CPD funds leveraged the following additional resources during the 2023 Program Year:

- In June 2024, MDHA Board approved HOME funds in the amount of \$4,586,224.37 to four projects to construct affordable housing. These HOME funds will leverage \$158,855,048 in other funds, representing a 34.64% return on every HOME dollar invested. This is in addition to the 25% match requirement. Sources of leveraged funds include low-income housing tax credits, private lender financing and owner equity. The funds leveraged and sources of leverage are exclusive of the HOME match, which is discussed below.
- Nonprofit and public agencies receiving CDBG funds for the 2023 Summer Youth Program leveraged an additional \$967,854.00 from other sources.

HOME, ESG, the Homeless Management Information System (HMIS), and the CoC (CoC) programs have match requirements. Match resources for the ESG program are provided in the ESG CAPER report and exceed HUD's requirements. In order to receive CoC homeless program funding during the program year,

applicants supplied a 25% match for all costs except leasing. To receive Permanent Supportive Housing funding, Nashville-Davidson County had to provide a value of supportive services that equals or exceeds 25% of the amount of rental assistance requested. In addition to these requirements, local agencies rely on funding from foundations, other federal government grants and private donations to leverage resources.

Nashville's HOME match liability for 2023 based on HUD PR33 is \$698,379.42. Match contributions to HOME projects during 2023 was \$1,250,000. This results in an excess match credit for 2023 in the amount of \$16,180,899.50.

Fiscal Year Summary – HOME Match	
1. Excess match from prior Federal fiscal year	\$15,629,278.92
2. Match contributed during current Federal fiscal year	\$1,250,000
3. Total match available for current Federal fiscal year (Line 1 plus Line 2)	\$16,879,278.92
4. Match liability for current Federal fiscal year	\$698,379.42
5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4)	\$16,180,899.50

Table 5 – Fiscal Year Summary - HOME Match Report

Match Contribution for the Federal Fiscal Year								
Project No. or Other ID	Date of Contribution	Cash (non-Federal sources)	Foregone Taxes, Fees, Charges	Appraised Land/Real Property	Required Infrastructure	Site Preparation, Construction Materials, Donated labor	Bond Financing	Total Match
7464		1,250,000						1,250,000

Table 6 – Match Contribution for the Federal Fiscal Year

Program Income – Enter the program amounts for the reporting period				
Balance on hand at beginning of reporting period \$	Amount received during reporting period \$	Total amount expended during reporting period \$	Amount expended for TBRA \$	Balance on hand at end of reporting period
\$322,588.34	\$334,236.61	\$380,923.64	0	\$275,901.31

Table 7 – Program Income

HUD changed the HOME Investment Program commitment requirement via an Interim Final Rule published in Federal Register Vol. 81, No. 232, December 2, 2016, to allow grantees to accumulate program income, repayments, and recaptured funds during the current PY to be budgeted/allocated to projects via the following year’s action plan. The balance of \$275,901.31 listed above includes repayments or recaptured funds.

HOME MBE/WBE report						
Minority Business Enterprises and Women Business Enterprises – Indicate the number and dollar value of contracts for HOME projects completed during the reporting period						
	Total	Minority Business Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Contracts						
Number	2					
Dollar Amount	\$1,130,359.76			2		
Sub-Contracts						
Number	4		1	2	1	
Dollar Amount	\$267,049.02		\$43,710	\$129,600	\$93,739.02	
	Total	Women Business Enterprises	Male			
Contracts						
Number						
Dollar Amount						
Sub-Contracts						
Number	5	5				
Dollar Amount	\$244,747	\$244,747				

Table 8 – Minority Business and Women Business Enterprises

Minority Owners of Rental Property – Indicate the number of HOME assisted rental property owners and the total amount of HOME funds in these rental properties assisted.						
	Total	Minority Property Owners				White Non-Hispanic
		Alaskan Native or	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	*1			1- Male		
Dollar Amount	*37,156.00			37,156.00		

Table 9 – Minority Owners of Rental Property

**MDHA utilized CDBG instead of HOME funds to provide assistance for the rehabilitation of rental properties. There was one rental rehab property in the amount of \$37,156 underway during this program year, which was provided to a non profit with an African American executive director.*

Relocation and Real Property Acquisition – Indicate the number of persons displaced, the cost of relocation payments, the number of parcels acquired, and the cost of acquisition						
		Number	Cost			
Parcels Acquired		0	0			
Businesses Displaced		0	0			
Nonprofit Organizations Displaced		0	0			
Households Temporarily Relocated, not Displaced		0	0			
Households Displaced	Total	Minority Property Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number						
Cost						

Table 10 – Relocation and Real Property Acquisition

CR-20 - Affordable Housing 91.520(b)

Evaluation of the jurisdiction's progress in providing affordable housing, including the number and types of families served, the number of extremely low-income, low-income, moderate-income, and middle-income persons served.

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	325	690
Number of Non-Homeless households to be provided affordable housing units	140	228
Number of Special-Needs households to be provided affordable housing units	364	219
Total	829	1,137

Table 11 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	689	909
Number of households supported through The Production of New Units	58	50
Number of households supported through Rehab of Existing Units	82	178
Number of households supported through Acquisition of Existing Units	0	0
Total	829	1,137

Table 12 – Number of Households Supported

Discuss the difference between goals and outcomes and problems encountered in meeting these goals.

Outcomes represent achievement of 137% of MDHA one-year goals. Some HOME projects have been delayed

due to the increase in material costs nationwide. However, HOME funds from PYs 2018 – 2021 committed to projects currently in various phases of construction will result in the addition of 736 units (146 Home-assisted) to the affordable inventory by the end of 2024. ESG and HOPWA rental assistance has been hampered by rising rental costs and lack of units available.

Discuss how these outcomes will impact future annual action plans.

Staff will review outcomes annually and attempt to align goals in future action plans with realistic outcomes based on staff and partner capacity.

Include the number of extremely low-income, low-income, and moderate-income persons served by each activity where information on income by family size is required to determine the eligibility of the activity.

Number of Persons Served	CDBG Actual	HOME Actual
Extremely Low-income	385	28
Low-income	88	22
Moderate-income	70	0
Total	543	50

Table 13 – Number of Persons Served

Narrative

The income levels of the households listed in the above table for the CDBG program pertain to affordable housing activities related to Homeowner Rehabilitation, Rental Rehabilitation, replacement of HVAC units, Weatherization Assistance and Services for the Homeless. The income information for the Homeowner Rehabilitation, Rental Rehabilitation and CDBG Weatherization Assistance, Roof Replacement, Accessibility Rehabilitation and HVAC replacement programs come from the BOSMAC PR-03 Report; while the numbers for Services for the Homeless come from in-house beneficiary data and information reported in IDIS activity #s 7454, 7184, and 7366. The income data for the HOME beneficiaries was taken from the HOME PR-23.

CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)

Service and housing providers in Nashville have been adjusting to a post-COVID era. Safe Haven Family Shelter staff reports a significant increase in extremely high arrears that were potentially accrued during the eviction moratorium, and providers are also seeing families become homeless as COVID funds dwindle. They are seeing more families with higher barriers of eviction history, mental health concerns, and lack of income, seeing parents with increased hesitancy around school and childcare enrollment, though that seems to be leveling out. Unprecedented CV funding allowed agencies to house more families than ever before with a continued success rate of 90% remaining housed for the duration of the first year in housing. However, with the drop in funding, have not been able to sustain staffing and client assistance.

Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through:

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

On July 1, 2023, the Metropolitan Homeless Impact Division, a subsection of the Metropolitan Social Services Department, became a standalone Department called the Office of Homeless Services (OHS) by ordinance of the Nashville Metro Council. OHS increased the number of its homeless outreach specialists from four to eight. The role of these eight staff is to coordinate within and outside the Metro government to serve people experiencing homelessness, including those living outdoors. This has solidified Metro's approach as trauma-informed, rather than punitive, incorporating offers of assistance, connecting people to mainstream resources and conducting in-field assessments, all of which help to decrease the amount of time that one experiences homelessness. Citizens throughout Nashville and staff at agencies reach out to OHS and report concerns or complaints regarding homeless encampments and other activities. OHS coordinates with local providers, including homeless outreach teams, to link people with needed services, address and de-escalate potential confrontations, and avoid arrests or unsafe outcomes. In May 2024, people who lived in emergency shelters had been experiencing homelessness for an average of 3 years and 6 months. People who lived outdoors had been experiencing homelessness for an average of 4 years and 1 month. Without the support of an array of partners in the public and private sector, nonprofits cannot decrease this number. Metro Government collaborates with private partners to leverage resources around homelessness, and coordinates outreach in four designated quadrants of Nashville to integrate people with services and offer housing options to those experiencing homelessness.

A consultant hired by the Mayor's office in 2022 did a performance study on homelessness and affordable housing programs in Metropolitan Nashville-Davidson County. This report, released in May 2022,

recommended that the duties of the CoC Collaborative Applicant be transferred from MDHA to Metro's soon-to-be-established Office of Homeless Services. Based on this recommendation, Nashville's CoC General Membership voted in November 2023 to designate the city's Office of Homeless Services (OHS) as Collaborative Applicant. Conversations are ongoing with HUD Field Office staff in Knoxville and Desk Officers in Washington about the transition, and MDHA awaits their approval for the FY2023 CoC Planning Grant to be assigned by MDHA and assumed by OHS. As part of this request, an MOU was signed by both agencies in mid-May 2024 outlining key responsibilities and MDHA's reimbursement to OHS for eligible expenses. Functionally, staff at the Office of Homeless Services has taken over related CoC duties formerly performed by MDHA staff. They are staffing CoC committees & the CoC General Membership meetings, as well as staffing and facilitating the local CoC process and working with the members of the Performance Evaluation Committee, Nashville's rating and ranking committee, to review and score new and renewal applications to HUD for funding. As the transition finalizes, MDHA's Homeless Coordinator is providing technical assistance with the HUD CoC application process, and collaborating regularly with OHS staff to assure a smooth succession.

ESG funds continue to support street outreach programs. The Contributor, Park Center, and the Salvation Army used the funding for outreach targeting homeless people living on the streets. They focused on outreach to engage 604 persons.

Access to services and housing is often hindered by a lack of transportation. A partnership between Nashville's WeGo Public Transit and OHS provided 604 annual bus passes this year at no cost to people who are at risk of, or experiencing, chronic homelessness. To be eligible, persons must actively work with a community housing navigator at nonprofit partner organizations to locate appropriate permanent housing options. The WeGo partnership includes bus rides or bus passes during extreme weather conditions throughout the year.

The CE assessment and prioritization process became operational in Nashville in January 2018. In the summer of 2020, staff at OHS worked with community partners to refine CE (CE) to standardize the way individuals and families at risk of homelessness or experiencing homelessness are assessed for, and referred to, the housing and services they need for stability. OHS continues to review the assessment and prioritization process for CE to ensure that it is equitable and that the community is housing the most vulnerable individuals and families. The traditional tool for this in Nashville has been the Vulnerability Index - Service Prioritization Decision Assistance Tool (VI-SPDAT), but it has proven to have had racially biased results, and OHS staff has been meeting for months with key stakeholders to research alternative methods that are more just. With the support of HUD Technical Assistance, OHS staff took part in a series of

community workshops to learn best practices for prioritization and begin the community-wide process of redesigning the assessment tool.

Neighborhood Health provided onsite vaccinations and testing at larger encampments, including but not limited to Downtown Area, Green Street Church, Fort Negley, Hermitage, and other locations, primarily during Monday-Thursday weekday Street Medicine visits to these locations. They also provided Monday-Friday walk-up COVID-19 vaccination and testing to persons experiencing homelessness at the Downtown Clinic, adjacent to Room in the Inn.

To better assess the unique needs of unsheltered persons, it is imperative to have reliable data that will highlight evolving trends and help citizens advocate for necessary resources. Data is the tool that brings the entire CoC's efforts together and equips Nashville to evaluate its system, plan strategically, and ultimately prevent and end homelessness. Staff at OHS partner with community providers working with people living outdoors and in shelters to enter data into the city's Homeless Management Information System (HMIS) and CE, and pulls monthly street outreach reports, highlighting an aggregated, unduplicated number of people living outdoors as well as their gender, race, age, length of homelessness, Veteran status, income/benefits, disability, etc. This data is collected regularly, providing the city with solid statistics about people sleeping in sheltered and unsheltered locations in Nashville. OHS is formalizing a partnership with the Nashville Rescue Mission (the largest shelter in Nashville), to import the Mission's data into HMIS, which promises to offer a clearer picture of homelessness in the city.

Room in the Inn (RITI), a HUD CoC-funded agency, has a formal relationship with local hospitals and MTMHI (Middle Tennessee's state-run psychiatric hospital). Through their referral process, individuals are accepted from hospitals to RITI's recuperative care program. Outside of Recuperative Care, RITI coordinates a Winter Shelter program that is a city-wide partnership with area congregations from November 1 to March 31. The agency also runs a year-round Day Center that offers mail services, prescription fulfillment through the Dispensary of Hope, education, laundry, showers and many more.

- *Addressing the emergency shelter and transitional housing needs of homeless persons*

ESG supplements state, local and private efforts to improve the quality and number of emergency homeless shelters by funding emergency shelters with necessary operating costs and related social services. ESG projects are run by well-established nonprofits that provide shelter, outreach, and Rapid Rehousing to veterans, victims of domestic violence, families, people with mental illness, and people attempting to

recover from addictions. Via ESG funding, 324 people or 97 households were assisted with deposits and short-term rental assistance via rapid re-housing funds to assist with entry into permanent housing. The cumulative number of people sheltered for the year was 1,688.

In addition to sustaining shelter operations, ESG funds have been used to expand street outreach. Essential services funds were allocated to The Contributor, Park Center and the Salvation Army for street outreach, and 604 people were served with these outreach efforts. A portion of the ESG funds was devoted to essential services such as birth certificates and other identification needed by homeless people in order to access services and housing. ESG assisted 525 individuals or 520 households in acquiring State identification, birth certificates and bus passes. All of these - shelter, essential services, and street outreach – are critical components of the CoC in Nashville.

Various agencies in the community work with Metro’s Office of Emergency Management, the Mayor’s Office and the Office of Homeless Services to implement the Cold Weather Community Response Plan, which has been updated annually since 2014. Although persons are urged to utilize existing shelter and services at Room in the Inn and the Nashville Rescue Mission, community members can ask to be added to a text alert system utilized each time Metro opens its overflow shelter. Other modes of communication are the city’s website, use of a QR code, and a phone number. Transportation is provided by WeGo, the city’s public bus system, and free shuttles carry people to this shelter from various encampments and other locations where people experiencing homelessness are known to congregate. For people with pets, a partnership exists to secure crates for animals. Youth ages 13-17 and young adults ages 18-24 are offered shelter and services at Launch Pad and Oasis Center. This plan also covers inclement weather events that are not related to cold weather, such as before and during potential flooding as well as alerts/watches for tornados.

OHS continually works to improve CE (CE) to ensure people experiencing literal homelessness have immediate access to emergency shelter and, when appropriate, to transitional housing programs. OHS helped to create, implement, and lead our community’s Outdoor Community Housing Surge. This has helped to decrease our overall unsheltered population accounted for in this year’s Point in Time Count.

- *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*

In mid-late 2023, Nashville’s strategic plan for 2022-2025 was updated and action steps streamlined. In the next year, responsible parties will be identified to accomplish goals, and an accountability plan will be created. The steps will align with the USICH (US Interagency Council on Homelessness)/federal government’s [All In: The Federal Strategic Plan to Prevent and End Homelessness](#) to get people off the streets, out of shelters, and into homes. The local plan incorporates the use of CE to prioritize households with the highest needs for assistance, and uses data to assess system and project performance.

Dr. Sam Tsemberis, known as the founder of the Housing First model, offered Housing First 101 training to Nashville’s CoC in 2022. At Nashville’s first Housing First Community Conference on March 7, 2024, hosted by the Metro Nashville Office of Homeless Services, the national expert led discussions around the principles of Housing First, overcoming barriers to housing, and human-centered approaches to providing services.

Using the local Homeless Management Information System (HMIS) managed by Metro’s Office of Homeless Services, Nashville’s CoC Data Committee and HMIS Oversight Committee created the Nashville CoC Priorities Report, recently updated for the period from October 1, 2022 through September 30, 2023, based on HUD’s fiscal/performance year. Committee members delved into outcomes related to race, access to permanent housing by chronicity and disability, and length of time persons experience homelessness before they are housed.

The report’s data show that a large majority of people experiencing homelessness in Nashville are in adult-only households, many of whom meet HUD’s definition of “chronic homelessness” and in need of permanent supportive housing. These individuals are least likely to be housed in our community and if housed, they wait longer than others before they are housed and often aren’t housed with the supports they need. The data also show that Nashville’s available housing resources do not meet the needs of people experiencing chronic homelessness.

The Data and HMIS Oversight Committees recommend that local data be used as the foundation for strategic data-driven decisions for CoC and other funding to more effectively meet the needs of people experiencing homelessness in Nashville. Data show that to fill the gap, Nashville should target projects that create new PSH units to serve people experiencing chronic homelessness and prioritize these projects for funding.

The findings from the report were used by the Performance Evaluation Committee (the local rating and ranking body for the CoC competition) to help prioritize new local projects submitted for the annual competition for HUD CoC funding. FY2023 CoC funds awarded to the Nashville-Davidson County CoC totaled \$9,695,266 and will sustain an array of existing homeless assistance programs at MDHA and other nonprofit organizations, as well as develop three new Permanent Supportive Housing projects, and

expanding permanent housing to 95 households (155 persons) annually. Persons eligible for these units must have disabilities and be experiencing homelessness.

With the shortage of affordable rental units in the local housing market, agencies using funds for rapid rehousing activities continue to face challenges in locating suitable housing; MDHA encourages the use of ESG funds for prevention. Several local agencies provide funds to pay arrearages on rent or utilities, helping people avoid eviction and/or utilities being disconnected.

ESG funds assist shelters with operating expenses, related essential services, and homeless re-housing activities. Forty-eight percent (48%) of the 2023 allocation was dedicated to rehousing and prevention efforts, the remainder was used to assist 11 nonprofit agencies with operating costs, such as utilities, routine maintenance and minor repairs, as well as to enhance street outreach and to further data collection efforts in HMIS. Data for these activities are included in the tables in the ESG CR-65 section of the CAPER as well as the ESG CAPER report.

An unprecedented amount of ESG-CV funding was awarded to Nashville in 2020. To optimize the funding and best position providers in the city to effectively use the funds to shorten homeless stays and move people into housing quickly, HUD deployed the services of a technical assistance provider to Nashville for a year. This led to the development of a plan involving cooperation from an extraordinary array of agencies, including the faith community, nonprofits, and government. They created a goal of housing more than 400 individuals and families experiencing homelessness. Nashville made huge strides, enhanced by additional ESG-CV funding from THDA. Nashville received an additional \$2.4 million in ESG funding from THDA via the CARES Act. MDHA worked with local stakeholders to assure that funds reduced homelessness as soon as possible. As of February 1, 2024, 1,022 individuals had obtained housing.

MDHA is dedicating a monthly set-aside of 18 mainstream Housing Choice Vouchers for persons experiencing homelessness - the longer-term subsidy needed for many homeless households to be successful in long-term stability. MDHA also administers 198 Emergency Housing Vouchers (EHV), made available through the American Rescue Plan Act (ARPA), specifically for people experiencing homelessness or who are at-risk. With the vouchers came additional funding to assist with housing search and placement, intended to get people off the streets and out of shelters into permanent affordable housing as fast as possible. Funding is also assisting with one-time application fees, security deposits, and utility deposits, as needed- all easing the way into critical housing. Since October 2021, MDHA has issued 382 EHV's and of those, 184 are currently leased. There have been no new EHV's issued as of 9/30/2023.

On October 4, 2022, Nashville's Metropolitan Council approved \$50 million in ARPA funding dedicated to

developing permanent housing & key supports- \$25M will assist with gap financing to create deeply affordable units, & the remainder is being used for Housing First supportive services, for housing navigation, interim housing, & expansion of the city's Low Barrier Housing Collective, which coordinates collaboration with landlords to house those experiencing homelessness. Funds also expanded Mobile Housing Navigation Centers, including one for 18-24-year-old LGBTQI+ individuals, creating a safe space for young people outside of the community's largest shelters. These temporary housing spaces receive referrals through CE but focus on the most vulnerable populations that avoid large congregate shelters. They are low-barrier access & housing-focused with a goal of placing participants into stable housing as quickly as possible.

To aid in assuring persons formerly experiencing homelessness who are served in permanent housing projects successfully retain permanent housing, MDHA has proposed an amendment to its original plan to use its HOME-ARP allocation of \$9,315,028 to focus on delivery of supportive services. Over 400 new units of permanent housing are in the local pipeline, which will increase the inventory available to persons experiencing homelessness. Integrating needed support services with those units will increase successful tenancies and stability, reducing the number of individuals and families who experience additional spells of homelessness. The draft of the amended action plan was posted for public comment on June 6, with a deadline of July 8.

Social Security's SSI/SSDI benefits can be a critical first step on the road to recovery. However, circumstances faced by people experiencing homelessness can impede access to these payments. In 2006, Park Center started employing the national SSI/SSDI Outreach, Access, and Recovery (SOAR) model in Nashville to increase access to these income and health care benefits. Over the last several years, other agencies have implemented SOAR in their organizations under the leadership of Park Center. According to what has been reported in the national SOAR Online Application Tracking (OAT) system, Since 2006 Nashville programs have assisted 1,760 people with obtaining an approval for disability benefits through the Social Security Administration with an average of 61 days, from time of application to time of decision. In PY 2023/2024, the county-wide programs assisted 51 people with an approval in an average time of 99 days.

In November 2018, the Substance Abuse and Mental Health Services Administration (SAMHSA) awarded Park Center a \$2.5 million "Treatment for Individuals Experiencing Homelessness" grant. Ending in November 2023, this grant allowed Park Center to serve 500 individuals over a 5-year period by providing outreach services; housing navigation and retention; disability assistance using the SSI/SSDI SOAR model; and referrals to psychiatric treatment, substance abuse treatment and employment assistance. Park Center also received ARPA Capacity Building funds in a partnership with Empower TN.

To further assist homeless persons with housing entry, \$292,545 in CDBG funds in the 2021 PY was allocated to provide one-time assistance, of up to \$1,000, for rent and utility deposits and first month's rent for persons housed. An additional \$160K was dedicated to this fund and approved by Metro Council in June 2023, and an additional \$250,000 was approved by Metro Council in April 2024. The assistance cap was raised to \$2,000 with the 2024 funding.

In May 2021, Nashville Mayor John Cooper announced the creation of the Landlord Risk Mitigation Fund. This program complements Emergency Solutions Grant Rapid Re-housing program funds as well as other voucher programs with a focus on increasing landlord participation to increase permanent housing options for individuals and families experiencing homelessness. The tools available for landlords include up to \$2500 per unit for minor repairs to make a unit move-in ready, up to \$500 per household to cover application fees and security deposits, and sign-on bonuses. Additionally, a Landlord Mediation Hotline has been created for landlords who accept housing subsidies for tenants transitioning out of homelessness. The hotline staff can mediate between landlords and tenants, offer support in cases of unexpected unit vacancies, process landlord mitigation fund claims, and respond to questions regarding various rental subsidy programs.

In October 2022, Mayor Cooper committed Nashville to becoming a Housing First community, and Metro Council approved by approving a \$50M Housing First award funded through ARPA. These funds will help with decreasing our average length of time that people are experiencing homelessness, increase and deploy supportive services into the homes of newly housed people, create new affordable permanent housing options, and incentivize opportunities for landlords and property managers. There are also funds to assist with the overall capacity building of local non-profits and service providers.

On January 29, 2024, HUD announced its awards of FY2023 CoC homeless funding. Nashville received \$9,695,266. Three new projects were awarded via the Bonus offering- two new Permanent Supportive Housing projects, and a new Joint Transitional/Rapid Rehousing project will focus on families and individuals who are survivors of domestic violence. The remainder of the funding is slated to sustain a substantial inventory built over the past decades, support HMIS, renew enhanced housing and services to households affected by domestic violence, and renew two Youth Homeless Demonstration Program (YHDP) projects offering critical Rapid Rehousing and homeless diversion to youth and young adults. This last program represents a substantial infusion of HUD CoC support for homeless youth in Nashville. In July 2018, Nashville was awarded a two-year, \$3.5 million grant from HUD's Youth Homelessness Demonstration Program (YHDP) to help end youth homelessness. This grant supports efforts to develop innovative interventions to assist unaccompanied youth and young adults (YYA) and will expand available supports and housing interventions such as access to affordable housing via RRH and interim housing such as bridge housing/host homes. Funds were renewed in FY2023, for the two projects. For the year ending September 30, 2023, 268

households were offered homeless diversion services, and 97 households accessed housing and services via Rapid Rehousing.

The responsibility for operating the CE (CE) phone line for families transferred from Metro Social Services to Office of Homeless Services on July 1, 2024. Nashville has more funding than ever to address the needs of families and build data that are used to understand how the city is moving the needle on family homelessness. Further support has been leveraged by foundations and HUD ESG and CoC funds.

The United Way of Greater Nashville (UWGN) launched The Family Collective (formerly The Family Empowerment Program) in July 2014 to address service gaps for families experiencing homelessness whose children were enrolled in Metropolitan Nashville Public Schools. With seed funding from the Siemer Institute, a nationally recognized organization for two-generational success, focused on reducing mobility rates for children to reach their education potential, UWGN funded Catholic Charities of Tennessee and Safe Haven Family Shelter to provide services for families experiencing homelessness or who were at-risk. By 2020, the initiative grew to include over 32 partner organizations who work together on a weekly basis to support TANF's purpose of providing assistance to needy families so that children can be cared for in their own homes. Since inception in 2014, more than 4,500 families have received services through partner agencies engaged in The Family Collective.

The Family Collective utilizes coaches at over 28 partner agencies across five counties (Davidson, Rutherford, Williamson, Cheatham, and Robertson) to assess client needs and stabilize families as they are enrolled. Staff are trained in evidence-informed approaches to ensure all families are engaged in an appropriate relationship drawing on the strengths of the family. The Family Collective focuses on stabilizing families with the appropriate housing intervention (Rapid Re-housing and Prevention) as well as appropriate wraparound services (Employment Navigation, Financial Counseling, or Mental Health). Once stabilized, partners focus on increasing family incomes through education and workforce training to help families thrive. Coaches work with families to develop individualized care and action plans, set goals, connect to resources, and family engagement events to build their social networks. Families are engaged through various entry points including CE, early learning centers, family resource centers, schools, and other community centers across Middle Tennessee. Families have access to a team of professionals and can receive financial assistance to remove any barrier standing in the way of their progress. UWGN established a shared data system that partners use to streamline communication and help families connect to services, while serving as the backbone to maximize resources and coordination across the ecosystem.

UWGN serves as the backbone organization of The Family Collective and is actively working on aligning the efforts with Nashville's CoC (CoC) as well as the Central Tennessee and the Rutherford-Murfreesboro CoCs

to build a system to prevent and end family homelessness and connect families with education/employment assistance to thrive. This includes aligning the referral process with CE processes within the relevant CoC and supporting entry of information into HMIS by partner agencies in accordance with local CoC practices.

The Family Collective seeks to give power back to families by providing space for families to inform service implementation while providers work alongside of each other to build trust, infrastructure (ex. CE processes, landlord networks, etc.) and have courageous conversations with all stakeholders in each community. The Family Collective strives to live into the 2Gen (Two-generation) model by focusing on collaborations that increase stability in adults and children through education, economic mobility, housing stability, health and well-being, and social capital. They have partnered with Elevate Consulting to assist with performance measures, outcome evaluation, trainings and facilitation, as well as the Burnett Group to assess our current model and integrate an intentional racial equity framework centering cultural competency, diversity, and inclusive practices. Highlights through June 2023 include over 4,500 families served, nearly 1,200 families housed, 1,800 families prevented from experiencing homelessness, \$8.8 million in direct assistance provided and \$416,964 in debt reduced.

The Village at Glencliff, consisting of 22 micro-homes, opened July 2021 and was developed by Open Table Nashville (with additional funding provided by Metro Nashville government) to provide medical respite bridge housing for the most vulnerable homeless persons on the streets of Nashville.

Construction is now complete on 90 new units of permanent supportive housing at The Strobel Center for homeless persons with space for services onsite using \$25,000,000 in local General Obligation Bonds. The grand opening was held July 18, 2024.

The Strategic Plan of the Homelessness Planning Council (“HPC”) is Nashville’s action-oriented endeavor to improve the Housing Crisis Resolution System for Nashville-Davidson County. This refreshed plan includes high-level goals and objectives for implementation by the HPC and its Committees, as Nashville strives toward a system where no person is forced to be homeless for more than an average of 90 days. The Strategic Plan is aligned with the federal strategic plan, “All In,” that aims to prevent and end homelessness for all people experiencing homelessness. The Homelessness Planning Council voted to approve the refreshed Strategic Plan in September 2023.

Since the original strategic plan was written in 2019, Nashville has weathered tornadoes (March 2020, December 2021, and December 2023), a pandemic (March 2020 – present), a bombing (December 2020), the second hundred-year flood in a decade (March 2021), a growing housing and affordability crisis, and a

recent change to state law that criminalizes camping on public land (July 2022). Nashville residents at 0-30% AMI are disproportionately affected by adverse weather, natural disasters, and the state's housing legislation. With these events and changes in Nashville and to our state laws, the HPC recognized the need to refresh the Strategic Plan in a way that reflects the urgency, responsiveness, accountability, and alignment required to address our current situation. The plan builds on the work accomplished since 2019, weaves in adaptability, and prioritizes making homelessness among residents at 0-30% AMI rare, brief, and non-recurring.

- *Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: likely to become homeless after 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); and, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs*

The CoC coordinates with systems that have procedures in place to prevent homelessness upon discharge: Foster Care; Mental Health Care; and Correctional Facilities.

Foster Youth:

Discharge protocols are formalized and implemented through the Tennessee Department of Children's Services (TN DCS, also referred to as the Department). Foster youth are eligible to receive independent living services starting at age 14. DCS ILP Specialists work directly and collaboratively with Family Service Workers, foster parents, contracted providers and youth to prepare for the transition out of care. Family Service Workers consult with ILP Specialists to provide guidance when developing an Independent Living Plan for youth in custody ages 14-16 and a Transition Plan for those age 17 and older, regardless of permanency goals, placement or adjudication. DCS oversees the Extension of Foster Care Services program for youth transitioning directly out of foster care into adulthood, and Youth Villages provides the EFCS case management for most young adults receiving that service via a contract with the Department. Youth Villages also provides a program called LifeSet via that contract, which is available for youth who are or were in DCS custody at age 16 or older, or adopted from DCS custody, up to age 23. DCS administers two scholarship services to eligible youth and young adults, four resource centers, and other programs via federal grants. When needed, DCS partners with the Metropolitan Development and Housing Agency (MDHA) to refer youth transitioning out of care for a Family Unification Program "FUP" housing voucher. DCS also partners with Oasis Center to refer youth transitioning out of care to the Youth Homeless Demonstration Program "YHDP".

Correctional Facilities:

Re-Entry

The Nashville Sheriff's Office has implemented the Transition from Jail to Community (JTC) Reentry Program in collaboration with nearly 40 nonprofits. This initiative aims to support individuals transitioning out of incarceration, regardless of their length of stay or legal status. The goal of the system approach is addressing the criminogenic needs of the justice involved citizens.

The program is structured to begin within 120 days or less of an individual's release from incarceration. Re-entry specialists collaborate closely with incarcerated individuals to formulate personalized transition plans. These plans are designed to facilitate a smooth transition by establishing connections to community support and essential services.

Furthermore, community-based organizations actively engage with individuals while incarcerated. This proactive involvement aims to initiate relationships early in the transition process. By doing so, it helps ensure individuals have access to a support network and necessary services as they prepare to reintegrate into society.

Overall, the JTC Reentry Program underscores a comprehensive approach to reintegration with an emphasis on support, skill-building, and community connections to maximize the likelihood of a successful transition from jail to the community.

Juvenile Justice

On August 8, 2024, The Davidson County Juvenile Court breaks ground on the future Juvenile Court Nashville Youth Empowerment Center (NYCE). The NYCE campus will feature an Assessment and Respite Center designed to serve as a single point of entry to best identify services for youth at risk for concerning behaviors, runaway, homelessness, and resource connection. In collaboration with the National Council of Juvenile and Family Court Judges (NCJFCJ), the Juvenile Court is building the operations of the Assessment Center with Technical Assistance (TA) for the project starting in September 2024. Additionally, the Court has recently reorganized the operations of the STAR team to focus on youth at risk of running away, family-initiated concerns, domestic assaults, youth court and the Diversion Partners Program.

Mental and Physical Health Institutions:

The Criminal Justice Liaison (CJL) Program is a community program to facilitate communication and coordination between the community, criminal justice, and behavioral health systems to achieve common

goals of decriminalizing substance use disorders (SUD), co-occurring disorders (COD), and mental illness (MI). The CJL supports services that promote diversion activities for persons with SUD, COD and/or MI who come in contact with the criminal justice system due to an arrest; and provide liaison and case management services to persons with SUD, COD and/or MI who are incarcerated or at risk of incarceration. The CJL works directly with the local jails and court system to facilitate access to service recipients with SUD, COD and/or MI who come in contact with the criminal justice system due to incarceration or at risk of incarceration in order to determine what services are needed and what referrals are necessary to redirect the service recipient from jail and the court system.

In addition to the services provided through the CJL program, other resources for discharge planning are available to individuals who are incarcerated in Davidson County or otherwise involved in the Criminal Justice system. Davidson County Sheriff's Office (DCSO) jail facilities have Medical Discharge Planners, employed by WellPath, and DCSO Case Managers. DCSO also has Re-Entry services available to individuals incarcerated in DCSO who are eligible. Additionally, individuals who exit from the DCSO Behavioral Care Center work with the Discharge Planner to prepare them for transition back to the community. Beyond the correctional facilities, individuals represented by the Nashville Public Defender's Office may be referred to their Client Advocate program and assigned a Client Advocate who assists with linking the client with community resources and developing a discharge plan if the client is incarcerated. Mental Health Court, Veteran's Court, Cherished HEARTS (human trafficking court) and Recovery Court address discharge planning needs of the individuals who have been accepted into these programs. Lastly, Community Corrections Dual Diagnosis Services develop discharge plans for their clients. All of these programs will also reach out to the CJL for assistance with discharge planning if needed.

In November of 2023 Centerstone concluded its final year of the Keys to Recovery grant. This grant was a 5-year, \$2 million grant from the "Substance Abuse and Mental Health Services Administration/Grants for the Benefit of Homeless Individuals". Over the 5 years Keys to Recovery integrated behavioral health treatment and supportive services for Nashville - Davidson County residents who were experiencing homelessness. These individuals also had substance use or co-occurring disorders. Individuals served by the program experienced high rates of addiction, severe mental illnesses, domestic violence, were on the sex offender registry, and/or were diagnosed with HIV/AIDS. These barriers made it difficult for them to find and sustain safe and affordable housing within Davidson County and the surrounding areas. Throughout the grant Centerstone staff worked closely with individuals to ensure they had the resources needed. This included food boxes, hygiene boxes, bus passes, clothing, tents, sleeping bags, supplies for their apartment when housing was obtained, and staff worked to find other resources for individuals as needed. Over the 5 years the Keys to Recovery grant served 141 individuals in the Nashville – Davidson county area. During this time staff collaborated with community-based organizations to ensure individuals enrolled in the grant has access

to a range of services. Some of these organizations included Metro Homeless Impact Division, the Veterans Administration, Welcome Home Ministries, Urban Housing Solutions, People Loving Nashville, The Bridge Ministries, and the Nashville Rescue Mission.

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

More recently, CMHSI in collaboration with the Metro Police Department and other stakeholders launched the Partners in Care program. Partners in Care pairs a Metro Police officer with a mental health counselor to go out to the scene together to assess and deescalate situations that formerly ended in the arrest of individuals having a behavioral health crisis. With the program in place since June 2021 in Nashville's North and Hermitage precincts, Partners in Care teams have responded to more than 1,000 mental health-related events. Of those, only 10 resulted in an arrest and instead pointed those in crisis to mental health resources. The Metro Council authorized expanding the program to additional precincts as part of its FY 2023 budget.

Of most relevance to Nashville's CoC, in 2020, CMHSI inaugurated a Supportive Housing Task Force that is seeking to improve coordination between agencies that provide health, mental/behavioral health, and substance abuse treatment services, especially as those agencies' clients are at risk of entering, or are already involved with, the criminal justice systems. The goal, like that of the wider CoC, is to ensure that people in need receive appropriate supportive housing. One focus of the Task Force involves exploring cross-sector collaboration to ensure social workers at the Sheriff's Office Behavioral Health Center are aware of and part of the CoC's CE (HMIS) process.

The Task Force understands that there is a dearth of supportive options available for people experiencing homelessness who have such severe and persistent mental health issues that they are unable to engage successfully and consistently with social workers. The goal is to explore all funding and programmatic options, as well as to develop protocols to assist getting people who have been living on Nashville's streets for years off the streets and into permanent housing options. The CMHSI effort is taking the place of an earlier attempt to create a Hospital to Home program to avoid duplicative efforts.

Mental Health Crisis Services

The Mental Health Cooperative (MHC) continues to provide various levels of case management mental health services to children and youth in Davidson County and across the mid-State. MHC is part of the Tennessee Health Link (THL) and care coordinators collaborate with inpatient social workers to formulate discharge plans with the patient and/or legal guardian. Formal protocols are implemented through TN Department of Mental Health and Substance Abuse Services to plan for individual needs at time of discharge. MHC collaborates with family and community supports to ensure prompt return from hospital care (within 7 days of discharge) and coordination with outpatient mental health services. Indigent/targeted funds provide temporary help with rent/utility deposits and supplements, transportation and medication copayments while income and benefits are re-instated. Mental Health Cooperative partners with Park Center SOAR program for linkage and referral for social security benefits. MHC operates the Metro-Davidson County PATH Program providing both outreach and case management services to those experiencing homelessness or at risk. The team also is comprised of a Peer Support Specialist and Primary Health Care Specialist. MHC PATH participates in a variety of community efforts to prevent homelessness, including participation in the HMIS and CE Systems. Just recently, MHC has made the decision to be part of the community-wide “open system” to further collaborate and coordinate for housing options.

In addition to these programs, MHC providers are now offering Medically Assisted Treatment (MAT) through a new division, Cooperative Recovery. This division specializes in treating those who are struggling with substance abuse and addiction. Treatment includes assessment, psychotherapy and behavioral counseling, community-based care management and psychiatric medication evaluation and management. These services are currently offered in Davidson and Rutherford Counties.

MHC has grant-funded program called Partners in Care Co-Response Team, which partners mental health counselor with Metro Nashville Police Department to provide intervention to those experiencing crisis and in need of assessment and linkage to support.

Mental Health Cooperative Criminal Justice (CJ)/ Behavioral Health Liaisons

The Criminal Justice Liaison (CJL) Program is a community program to facilitate communication and coordination between the community, criminal justice, and behavioral health systems to achieve common goals of decriminalizing substance use disorders (SUD), co-occurring disorders (COD), and mental illness (MI). The CJL supports services that promote diversion activities for persons with SUD, COD and/or MI who come in contact with the criminal justice system due to an arrest; and provide liaison and case management services to persons with SUD, COD and/or MI who are incarcerated or at risk of incarceration. The CJL works directly with the local jails and court system to facilitate access to service recipients with SUD, COD and/or

MI who come in contact with the criminal justice system due to incarceration or at risk of incarceration in order to determine what services are needed and what referrals are necessary to redirect the service recipient from jail and the court system.

In addition to the services provided through the CJL program, other resources for discharge planning are available to individuals who are incarcerated in Davidson County or otherwise involved in the Criminal Justice system. Davidson County Sheriff's Office (DCSO) jail facilities have Medical Discharge Planners, employed by WellPath, and DCSO Case Managers. DCSO also has Re-Entry services available to individuals incarcerated in DCSO who are eligible. Additionally, individuals who exit from the DCSO Behavioral Care Center work with the Discharge Planner to prepare them for transition back to the community. Beyond the correctional facilities, individuals represented by the Nashville Public Defender's Office may be referred to their Client Advocate program, and assigned a Client Advocate who assists with linking the client with community resources and developing a discharge plan if the client is incarcerated. Mental Health Court, Veteran's Court, Cherished HEARTS (human trafficking court) and Recovery Court address discharge planning needs of the individuals who have been accepted into these programs. Lastly, Community Corrections Dual Diagnosis Services develop discharge plans for their clients. All of these programs will also reach out to the CJL for assistance with discharge planning if needed.

CR-30 - Public Housing 91.220(h); 91.320(j)

Actions taken to address the needs of public housing

MDHA is the Housing Authority for Nashville–Davidson County. MDHA sought and received HUD approval to convert Metro Nashville's entire portfolio of public housing properties to Project-Based Rental Assistance (PBRA) through the Rental Assistance Demonstration (RAD) and has completed the conversion.

MDHA's Affordable Housing Department oversees Metro Nashville's subsidized housing stock, including the administration and maintenance of 6,721 assisted/subsidized units which provide housing for more than 14,000 customers. MDHA utilizes an online application process for its Housing Programs. Under this system, applicants can select any property where they would want to reside. The online system provides advantages to applicants because they can apply from the comfort of their own home, and it also allows them to be assisted by friends and family when necessary. The online process also saves them both time and travel expense, and eliminates the frustration associated with standing in long lines to apply in person. Further, if they are working with service providers, the provider can assist them with the application process from their office. MDHA expanded the online service during 2018/2019 to allow affordable housing residents the option to also make online payments. Residents of MDHA properties can now pay their rent in person, online with a credit card, or via one of the many retail outlets that accept walk

in payments (WIPS). This allows residents the option to make in person payments outside of the ordinary MDHA office business hours. This online system also allows for residents to complete their recertifications and process changes pertaining to their account.

Master planning for four MDHA sites is complete (Cayce Place and Napier Place & Sudekum Apartments, and Edgehill Apartments). Cherry Oak Apartments completed construction in 2024, and 5th & Summer and Park Point East are under construction, with anticipated completion dates of Summer 2025 and Fall 2026, respectively. The Cayce Utility Phase 1B project to support redevelopment in the Cayce neighborhood was completed in 2023. Design work is underway for a central greenspace that will serve as a civic and social hub of the Cayce Place Transformation. All of these contribute mixed-income housing to the Cayce neighborhood and support a vital community. Site and security improvements are being installed at Cumberland View. MDHA's goal is to replace all subsidized housing one-for-one while adding new affordable units, workforce (80 – 120% AMI) and market-rate units at our six largest neighborhoods: Cayce Place, Napier Place, and Sudekum Apartments, Edgehill Apartments, Cheatham Place, Andrew Jackson Courts, and Cumberland View.

MDHA's Resident Services Department leads digital literacy programming to narrow the digital divide by bringing digital literacy training, high-speed broadband access, and ongoing support to families living in MDHA communities. Programming represents a national collaboration between businesses, nonprofits and governmental organizations with generous in-kind services. MDHA's Community Engagement Partnership Manager oversees this program. Between June 1, 2023 – May 31, 2024 the program served 138 households, provided 175 devices, and trained 42 individuals and 175 youth. Additionally, MDHA partnered with the Nashville Public Library and Lentz Health Center to implement a Senior Tech Academy that provided digital literacy training and devices to 283 seniors 60 years and older, with a particular focus on accessing telehealth and virtual socialization opportunities.

All of the newly constructed MDHA affordable housing properties and those currently under construction are/will be wired for broadband/internet access. All LIHTC developments will have computer workstations (1 per 50 LIHTC residents) with internet access in an accessible location during normal working hours for our residents.

Between June 1, 2023 – May 31, 2024, MDHA received the following grant awards to address the needs of affordable housing/assisted housing residents:

1. West End Home Foundation: June 14, 2022, MDHA received a grant award from the West End Home Foundation/SeniorTrust Reducing Social Isolation and Increasing Access to Essential Services through Digital Literacy and Inclusion for Older Tennesseans Grant Program. Funding supported expanding digital literacy programming to 117 residents (60 years and older). MDHA recruited volunteers to

participate in Nashville Public Library's digital literacy curriculum training to increase capacity and reach more seniors. Participating seniors received age-appropriate, culturally sensitive, digital literacy training, and a high-quality tablet device. Seniors learned to use technology in meaningful ways to break down barriers to full participation in their communities, reduce social isolation, and improve overall health and well-being through expanded community connections and support services.

2. Vaccination Outreach (\$769,323): June 23, 2022, the Tennessee State Department of Health awarded MDHA \$769,323 over two years to support four new community health workers. These community health workers will develop and implement community engagement strategies to promote vaccination efforts and increase vaccinations and confidence and ensure equitable distribution and administration in Nashville's underserved neighborhoods.
3. Regions Bank (\$25,000): Since August 2022, Region's Bank awarded MDHA HTC \$25,000 to support MDHA's Work Readiness Revolving Loan Fund, a no-interest loan to increase economic prosperity and social justice by removing fees and legal barriers for individuals who earn low incomes. Since then, the program has served 987 individuals with workforce barrier removal assistance (e.g., driver license reinstatement and criminal record expunction assistance) and had \$1.2 million in fees waived through Indigency Filing which helps waive other owed fees enabling eligibility for record expunction.
4. Fifth Third Bank (\$50,000): October. 1, 2022, Fifth Third Bank awarded MHDA HTC \$50,000 to support Coding Camps, a program that introduces high school students who live in Cayce Place to in-demand coding scripts and is career oriented. In total, 79 high school students completed the Coding Camps, have proficient knowledge of at least one coding script, understand how to be good digital citizens and completed a final project to showcase in a portfolio.
5. Public Entity Partners (\$7,325): Since October 2022, Public Entity Partners awarded MDHA \$7,325 to support driver safety training. Each year MDHA provides defensive driver training for new employees that drive agency vehicles. Also, all agency drivers attend defensive driving training every three years. The purpose of the exercise is to educate staff on safe driving to reduce the number of vehicle accidents.
6. Truist Foundation (\$40,000): November 4, 2022, Truist Foundation awarded MDHA HTC \$40,000 to support building career pathways to economic mobility through MDHA's Financial Freedom and Homebuyer Club programs, specifically reskilling and upskilling initiatives through professional development training, as well as basic program supplies like incentives for milestones and evaluation tools. Since then, participants have graduated from either MDHA's Financial Freedom or Homebuyer Club programs; 81 Financial Freedom graduates know their credit score, understand the importance

of and increase their credit scores in a meaningful way; and 18 Homebuyer Club graduates have increased their credit score by repairing pay offs and collections on their credit reports and getting out of any defaulted status; understand the importance of being bankable and establish patterns of paying their bills on time and contribute regularly to shavings.

7. Community Foundation of Middle Tennessee (\$12,500): November 16, 2022, the Community Foundation Middle Tennessee awarded MHDA HTC \$12,500 to improve workforce equity for 75 individuals who earn low incomes by removing employment barriers like record expunction and waiver of legal fees.
8. MyObamacare TN (\$182,974): June 1, 2023, MyObamacare TN awarded MDHA \$182,974 to support a new fulltime healthcare enrollment coordinator for three years. This enrollment coordinator will help MDHA residents find and enroll in high quality health insurance plans. Current, individuals whose household income does not exceed 150% of the [federal poverty level](#) (FPL) are eligible to enroll year-round. Once enrolled, coverage begins the first day of the following month. For households that earn more than the FPL, open annual enrollment begins November 1 and ends January 15. The enrollment coordinator attends outreach events coordinated by MDHA and community partners and regularly distributes information on myObamacare and enrollment throughout MDHA communities.
9. AmeriCorps VISTA: March 7, 2023, AmeriCorps VISTA: AmeriCorps renewed MDHA's grant award for four (4) AmeriCorps Volunteers in Service to America (VISTA) workers to address poverty in Year Seven (7) of the Nashville Promise Zone. Funding from this grant will compensate the VISTAs based on the local poverty rate; the total award is equivalent to \$70,400. The four VISTA position include coordinators who focus on affordable housing, jobs and economic activity, crime reduction and education as well as communications. The mission of the Nashville Promise Zone is to foster intensive partnerships among Nashville's organizations that serve high-poverty neighborhoods, improve the collective impact of their service, and address revitalization in a collaborative way.
10. Affordable Connectivity Program: March 31, 2023, The Federal Communications Commission (FCC) awarded MDHA two Affordable Connectivity Program (ACP) grant awards: 1) *Your Home, Your Internet* (\$372,109): (one-year grant term) and 2) *ACP Outreach* (\$450,000): (two-year grant term). Before the FCC ended the program early, MDHA staff helped enroll about 200 residents. Through a partnership with the Community Foundation of Middle Tennessee, each resident was assisted with transferring to a low-cost option or canceling their contract and returning equipment.

MDHA is currently compliant with all fair housing and civil rights requirements and is not under a Voluntary Compliance Agreement.

MDHA's Rental Assistance Department administers the Section 8 Housing Choice Voucher and Moderate Rehabilitation Programs. In 2023, MDHA provided rental assistance through the voucher program to over 7,000 households. The Rental Assistance Department strives to reach an annual utilization rate of at least 99%. There are 677 landlords participating in the voucher program, with 103 added in the calendar year 2023. The department continues to conduct landlord outreach in an effort to increase the supply of available units for program participants. There are approximately 6,331 households currently on the waiting list. 2317 Section 8 Vouchers were issued from June 1, 2023 to May 31, 2024. To date, 1065 project based vouchers have been awarded or are in the process of being awarded, with 826 of those awarded being for new construction of units.

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

MDHA provides multiple opportunities for residents to be involved. Two (2) of seven (7) membership positions on the MDHA Board of Commissioners are filled by residents. Residents also have the opportunity to serve as a member or as an officer of their local Resident Association for their community of which there are 22 active associations. Each association provides on-site leadership, collaborates with the Resident Services Department to sponsor special events such as HUD Strong Family Day and National Night Out Crime prevention, and attends the MDHA Board of Commission meetings.

The Resident Services Department provides a wide variety of direct services and resources for residents. In addition, the Resident Services Team coordinates numerous services and initiatives offered by other organizations and non-profit service providers. All initiatives and services seek to improve personal health, housing stability, economic mobility, self-sufficiency and quality of life. The on-going Financial Freedom Program and Homebuyers Club provides pathways for financial education and homeownership for any MDHA resident. Since June of 2023, the Financial Freedom Program provided 7.5 hours of training sessions to 455 participants and 7.5 hours of homeownership training to 181 participants. At least seven graduates of the home-buyers club reported purchasing homes after the training.

In addition to the Financial Freedom and Homebuyers program, MDHA administers the Family Self-Sufficiency (FSS) Program and the Section 3 Workforce Readiness programs that help individuals utilize free job training and education from service partners such as the Urban League of Middle Tennessee, Goodwill Industries, and Nashville State Community College. The Family Self-Sufficiency (FSS) Grant

Program is a long-term initiative that encourages and assists residents in achieving individualized goals, attaining financial independence and home ownership for those who seek to become homeowners. Intensive goal-driven case management and making linkages for wrap-around services are fundamental components of this initiative. The types of services received through the grant programming are similar to those offered by the other MDHA Resident Services Coordinators, but these grant-funded activities are typically more intensive and offer case management for up to 5 years.

The Section 3 Work-force readiness program, counsels resident job seekers to prepare for employment by offering job readiness training, referrals to free career training and offers mini loans to purchase work ready items such as uniforms, boots, eyeglasses and more. Since June 2023 the FSS program has grown to a case load of 83 families and the Section 3 job readiness program has offered service and outreach to 379 families.

In early 2024, the MDHA Resident Services Department partnered with Wilson Bank and Trust to offer MDHA homebuyers the MDHA mortgage interest buy-down program. Interested participants who complete the MDHA Financial Freedom and Homebuyers program are eligible to receive a 1% APR interest rate reduction on a 30-year fixed-rate mortgage.

Resident Services offers a host of additional services that promote self-sufficiency and seek to reduce poverty in PBRA affordable housing communities. Through the HUD-funded Community Choice Demonstration grant, the Resident Services program has helped 56 families utilize their Housing Choice Voucher to relocate from high-poverty zip codes to Nashville's "Opportunity Zones," which offer better education, more services, and safer neighborhoods.

During the summer of 2023 through June 2024, the Resident Services Team hosted many events to merge self-sufficiency resources with MDHA families, including sponsoring summer internships for 4 MDHA teenage residents, awarding five \$2,000 scholarships to MDHA college-bound students, hosting one Habitat for Humanity pre- enrollment sessions at an MDHA property. The Connect Home program was also offered to senior citizens and high school students. The Connect Home program is designed to narrow the digital divide between MDHA residents. Participants received computer hardware training and an introduction to software and were given laptop computers. Through the end of 2023, 258 total Connect Home participants were served.

Actions taken to provide assistance to troubled PHAs

As of the latest assessment, MDHA is considered a high performer.

CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j)

Actions taken 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.)

- In fall 2022, the Metro Housing Division launched the Mixed Income Payment-in-Lieu Taxes (PILOT) program. The program is designed to incentivize mixed-income housing that is affordable to households with incomes at 75% or less of the area median income for the Nashville-Davidson MSA in multifamily properties that otherwise would not have any income-restricted units. Metro Council has capped the amount of taxes that can be abated for new projects to \$3M annually. With the first round, 5 projects were approved and will result 466 new units restricted to 75% AMI or below, with 42% of the units to be located in the downtown core where currently only 2% of units are affordable to households at 80% AMI or below.
- Following legislation enacted by the State of Tennessee, Metro Council approved the expansion of the income requirement to \$60,000 for older adults age 65 and older to participate in Metro's tax freeze program. This allows more older adults to qualify for the program and age in place.
- Metro Council passed a resolution (RS2024-288) on March 19, 2024, requiring Metro Nashville Planning Department, Nashville Department of Transportation, Codes, Metro Water Services, and Metro Historic Zoning Commission to coordinate multiple ongoing studies and determine appropriate changes to zoning or building code to improve affordability and equity. The resolution requires the Planning Department to prepare a report on infrastructure capacity compared to growth regulations and the impact of regulations on housing supply, affordability, and equity. The recommendations should include information on the policy and regulatory changes needed to encourage affordable housing and analysis on the benefits and impacts of such changes on communities of color and to ensure equitable access to amenities and opportunities. The Planning Department is in the process of preparing the report and is targeted for completion by end of June 2025.
- Metro Nashville's Housing Division is developing a Unified Housing Strategy (UHS) that will set goals, outline strategies, and provide policy and program recommendations to advance access to

affordable, safe, and stable housing for all Nashvillians. The Housing Division has partnered with HR&A Advisors, Pillars Development, and MEPR Agency to support the development of the UHS. To inform the strategy, the consultant team will be conducting an analysis of housing trends, programs, and operations; engaging with community members, housing subject-matter experts, and stakeholders; and reviewing promising practices from other regions. The development of the Unified Housing Strategy kicked off in April 2024 and is expected to be completed by the end of 2024.

- In March 2023, Mayor Cooper announced the launch of the Community, Asset, and Land Use (CAL) program to help streamline process for building Nashville as the city continues to grow. The CAL program will improve the permitting process and coordination across all departments responsible for permitting. Metro Nashville's Housing Division will be integrated into the CAL program helping improve the efficacy of the expedited review process for affordable housing developments. Metro offers prioritization for departmental review of certain permit applications and related reviews for qualifying affordable housing developments. Prioritized departmental review provides for the review of eligible permit applications in advance of other applications, out of chronological sequence. The review process itself is not otherwise expedited. The Metro Housing Division determines whether a project meets affordability criteria and issues affordability certification letters that can be provided to respective Metro departments.
- Nashville's Planning Department is actively engaged in discussions and exploring the potential of a new tool introduced by Tennessee's HB 2623/SB 2496. This recent legislation allows local jurisdictions to offer voluntary zoning incentives to developers who commit to incorporating more affordable housing options into their projects. The Planning Department is evaluating how adjustments such as increased density, reduced parking requirements, and decreased building setbacks could be leveraged to enhance affordability in new developments, aiming to balance growth with equitable housing solutions.
- In 2015, MDHA was granted authority to negotiate and accept Payments in Lieu of Taxes (PILOTS) from qualified lessees of low-income housing tax credit (LIHTC) properties. During FY 2023, Metro Council approved six (6) PILOTS for rental housing developments, which will provide an estimated tax abatement of \$17,486,940 over a ten-year period to enable the creation of 864 units of affordable housing.

Other Housing Initiatives

- Metro contracted with Hastings Architecture to lead a feasibility study to acquire 88 Hermitage Ave (formerly Tennessee School for the Blind) to be used for affordable housing. They are currently meeting with Metro departments. Metro Housing Division Staff are reviewing other Metro property to determine potential for development.

- Metro Nashville’s Housing Division has created a public-facing dashboard that showcases Metro Nashville’s locally funded affordable housing programs as well as data on housing costs and housing needs. The dashboard is updated on a quarterly basis and includes program data for the following programs: LIHTC PILOT, the Barnes Fund, ARPA programs, and the Mixed Income PILOT.
- In 2022, the Metro Nashville Council funded a two-year pilot program known as the Eviction Rights to Counsel (ERTC) program to help mitigate and prevent evictions. The program is a collaboration between Metro government, the Legal Aid Society of Middle Tennessee, and the Nashville Hispanic Bar Association to provide free legal representation to people in Davidson County facing eviction. In March 2024, Metro Nashville’s Council voted to approve an additional year of funding for the program. In its first two years of funding, the program was able to help nearly 1,400 people according to the Legal Aid Society.
- In June 2024, the Community Foundation of Middle Tennessee, First Horizon, the Metro Housing Division, and other funding partners launched the Nashville Catalyst Fund, a new tool to create, preserve, and develop more affordable housing. Metro and its partners created the Nashville Catalyst Fund to provide fast, flexible capital to mission-driven developers to enable them to move quickly in Nashville’s competitive real estate landscape. The Fund will launch with an initial \$75 million investment - \$20 million from Metro Nashville, \$50 million credit facility led by First Horizon, and \$5 million from Vanderbilt University – with a goal to raise an additional \$25 million. The loans from the fund will support affordable housing developers working to preserve and develop income-restricted housing for 30 years and beyond, as well as bringing unregulated housing into income and rent regulations, which ensures the population in need is benefitting the most.
- In June 2024, HUD announced that Metro Nashville’s Planning Department and Housing Division was awarded \$5 million under the Pathways to Removing Obstacles to Housing (PRO Housing). In November 2023, Metro Nashville’s Planning Department and Housing Division submitted its application requesting the maximum amount allowed of \$10 million. Metro Nashville will revisit the proposed activities given the final allocation of \$5 million and take into consideration additional resources and new studies that have commenced since the application was submitted in November 2023. This new grant funding presents a pivotal opportunity for the Department to address critical barriers hindering affordable housing development. This funding will provide additional resources to the Department that may be used towards financing of affordable housing, supporting initiatives aimed at enhancing developer capacity, and expanding out network of capable partners committed to advancing affordable housing solutions in our community. The award will allow the Housing Division/Department to pursue and advance innovative partnerships, including with faith-based institutions, that will further affordable housing opportunities for Nashvillians while providing economic opportunities for diverse partners.
- In November 2022, Metro Council approved \$30 million in American Rescue Plan Act (ARPA) funds

to 1) create pathways for homeownership for populations with historic barriers to homeownership, 2) provide housing opportunities for older adults, 3) create innovative housing solutions for families and 4) support Envision Cayce. Since the funding was approved, Metro Nashville's Housing Division has utilized ARPA funding to advance these various initiatives. The Housing Division awarded \$6.5 million dollars in ARPA funding to three projects to fund new construction of 135 new units of rental housing for older adults ages 62 and older who are earning 60% of the Area Median Income (AMI) or below. ARPA funding has also been used to advance homeownership opportunities and shared equity housing for families. In Spring 2024, Metro Nashville's Housing Division awarded \$7 million in ARPA funding through the Barnes Fund to William Franklin Buchanan Community Corporation to develop a cooperative housing model for families earning at or below 50% of the Area Median Income. The funding will support the creation of 60 units of affordable housing for families. This is Nashville's first-ever funding of a cooperative housing model. The Housing Division also awarded \$760,554 in ARPA funding through the Barnes Fund to The Housing Fund to build five new-construction single-family homes on five designated Community Land Trust parcels.

- On July 18, 2024, Nashville opened its first permanent supportive housing (PSH) facility. The Strobel House is a \$35 million development that will feature 90 homes for Nashvillians experiencing homelessness. Half of the homes in Strobel House are reserved for those experiencing chronic homelessness, and the other half will be reserved for unhoused veterans, young adults, and LGBTQ+ individuals. The Strobel House has an on-site clinic with support staff where residents can receive treatment for substance use disorder, mental illness, and long-term medical challenges. Other amenities include computer rooms, bike rack rooms, mailroom, and community spaces.

Actions taken to address obstacles to meeting underserved needs. 91.220(k); 91.320(j)

Affordable Housing

The Metro Council via the Barnes Housing Trust Fund awarded \$7,760,554 million in grants to 2 nonprofit housing developers in the Round 12 funding cycle of ARPA funds to build 65 units of new affordable housing. Of these 65 units, 5 will serve low-income homebuyers.

Metro's Housing Trust Fund Commission has recommended sixteen awards for approval for Round 13 of the Barnes Fund. Of the recommendations, over \$1.9 million dollars was recommended toward single-family home rehabilitation for low-income homeowners. Funding included monies for critical home repairs for aging adults to remain in their homes, home rehabilitation in rapidly changing neighborhoods, and sustainability upgrades to improve energy impacts on low-income homeowners.

The commission also recommended awarding over \$36 million to 13 community organizations to create an

additional 974 units in a range of sizes from smaller, one-bedroom, micro homes (detached and condos), townhomes, shared living, single-family homes, apartments for large families. Of these 974 units, 73 will serve low-income homebuyers.

Metro has awarded 124 back-tax properties to nonprofits for housing development.

Most organizations awarded funding through Barnes included access to transit within 1/2 mile of a WeGo bus stop. Land availability continues to be an issue for this priority as resources become more scarce and land costs rise. To address this concern, the Barnes fund created a subsection (\$3 million) specifically allocated for developments that fell within the Urban Zoning Overlay to address the need for access to transit oriented development. 42% of organizations that applied for funding in 2021 qualified for the UZO subsection.

In Fall 2022 and Spring 2023, Metro Council approved the Barnes Fund's highest level of funding in its history. Round 10, approved in November 2022, awarded \$19,995,144 in American Rescue Plan Act (ARPA) funding to 15 organizations to create or preserve 848 units of affordable housing. Three organizations also received 14 parcels of Metro-owned delinquent tax lots. In Round 11, approved in June 2023, 12 organizations received a total of \$15,813,262 and 11 parcels of Metro-owned delinquent tax lots. The funding was a combination of \$6.5M ARPA funds and \$9.3M in Barnes general funding. The result was 549 total units: 369 Barnes-funded rental and homebuyer units, 44 Barnes-funded rehab units, and 136 Older Adult Rental units funded by ARPA.

Substantial progress has been made on activities/projects that received funding in conjunction with the \$50 million Housing First Initiative utilizing American Rescue Plan (ARPA) funds that were approved by Metro Council in 2022. The funding initiative dedicated resources to Affordable Housing Gap Loans (further described below), Housing First support services, temporary housing, landlord engagement efforts and competitive grants for local support service providers. Information on the results of this funding initiative as of May, 2024 can be viewed at the following link:

<https://www.nashville.gov/sites/default/files/2024-05/American-Rescue-Plan-Report-May-2024.pdf?ct=1716391762>

\$25,000,000 from ARPA was allocated to MDHA to create an Affordable Housing Gap Financing Program (AHGF) that was designed to provide funds to Developers with shovel-ready projects with a funding gap that was needed due to increased construction costs/supply chain issues. In exchange for these funds, Developers agreed to set-aside a minimum of two (2) percent of the units in the project to be leased to tenants with incomes at or below 30% AMI and an additional two (2) percent to be leased as permanent supportive housing for tenants referred via the CE process for a minimum of 20 years and adhere to the

“Housing First” model. MDHA awarded \$16,617,591.67 during three funding rounds to three non-profits and three for-profit organizations that will create 102 AHGF units, 810 total affordable. The unallocated funds of \$7,551,528.75 were remitted to the Barnes Housing Trust Fund for affordable housing projects as outlined in the Council Resolution RS2022-1696.

Promise Zone

"Nashville was selected as one of 22 Promise Zones (PZ) around the country in June 2016. The Nashville Promise Zone (NPZ) encompasses 46 square miles and is divided into 6 subzones; the boundaries of the PZ closely align with most of MDHA’s CDBG target area that were outlined in the 2018-2023 Five Year Consolidated Plan. MDHA is the lead organization for the NPZ and has a close partnership with local nonprofit organizations on its implementation. The mission of the Nashville Promise Zone is to foster intensive partnerships among Nashville’s organizations that serve high-poverty neighborhoods, improve the collective impact of their service, and address revitalization in a collaborative way. The

In March 2023, AmeriCorps renewed MDHA’s grant award for four (4) AmeriCorps Volunteers in Service to America (VISTA) workers to address poverty in Year Seven (7) of the Nashville Promise Zone. Funding from this grant will compensate the VISTAs based on the local poverty rate; the total award is equivalent to \$70,400. The four VISTA positions include coordinators who focus on affordable housing, jobs and economic activity, crime reduction, and education, as well as communications. The NPZ goals focus on promoting economic stability through job training, reducing youth violence through programming and mentorship, and supporting access to affordable housing through financial counseling, literacy, and new unit creation.

In November 2023, responsibilities for the NPZ Program were transitioned from MDHA’s Department of Community Development to the Department of Resident Services with the belief that the future work of NPZ should focus more directly on serving MDHA Residents.

Activity highlights for the past program year include the following:

- In June 2024, HUD selected MDHA for a 3-year Resident Opportunities and Self-Sufficiency (ROSS) program grant award. Funding will hire and maintain one ROSS Service Coordinator who will assess the needs of residents and coordinate available resources in the community to meet those needs. The ROSS Service Coordinator will focus on three (3) areas of need: 1) workforce development, 2) education and 3) health and wellness.

- In June 2024, MDHA received ongoing technical assistance from First Pic and ABT Associates for participation in the U.S. Department of Housing and Urban Development Community Choice Demonstration grant.
- MDHA has constructed 600 of 1,432 (42% complete) new rental units of affordable, mixed-income housing in Cayce Place, with two (2) additional affordable housing construction projects underway: 5th and Summer located at 725 South Fifth Street, Nashville, TN 37206 will include 107 mixed-income units and is scheduled for completion in the Summer of 2025; Park Point East located at 620 Summer Place, Nashville, TN 37206 will include 203 mixed income units and is scheduled for completion in the Spring of 2025.

Community Need and Impact Evaluation Criteria

To help ensure projects meet underserved needs, MDHA includes Community Need and Impact as an evaluation factor in requests for applications (RFAs) for CDBG and HOME competitive awards. Applicants are required to demonstrate the need for the program or project in the particular area and how their application will meet that need. To utilize CPD funds to the greatest extent possible and reach the greatest needs, MDHA seeks to partner with organizations that can demonstrate leveraged resources.

Homelessness

Construction is now complete on 90 new units of permanent supportive housing at The Strobel Center for homeless persons with space for services onsite using \$25,000,000 in local General Obligation Bonds. The grand opening was held July 18, 2024.

8 units of Permanent Supportive Housing for the homeless population funded with CDBG-CV dollars was completed in May of 2024.

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Actions taken to reduce lead-based paint hazards. 91.220(k); 91.320(j)

MDHA implements its housing related activities in accordance with all applicable HUD, EPA, and State of Tennessee regulations. When providing assistance under its housing programs, MDHA provides all clients and potential clients with the “Lead-Based Paint” pamphlet that describes hazards of lead-based paint. Pursuant to 24 CFR Part 35, all rental and homeowner dwelling units that wish to receive federal assistance and were built prior to 1978 are tested for lead-based paint. These tests consist of visual inspections, lead screens, and full assessments. In addition, addressing lead-based paint hazards is an eligible activity in the home rehab programs and rehab of shelters and community centers.

Actions taken to reduce the number of poverty-level families. 91.220(k); 91.320(j)

Part of MDHA’s ongoing anti-poverty effort is to provide job training, employment, and contract opportunities for federally subsidized housing residents and low- or very-low-income residents in compliance with the regulatory requirements of HUD’s Section 3 program. Section 3 aims to help residents obtain the skills and employment needed to become self-sufficient and to provide opportunities for qualified, low-income business owners to receive preference in bidding on HUD-funded contracts in their neighborhoods. MDHA employs a Section 3 Work Readiness Coordinator to facilitate activities linking residents to employment and training opportunities, as well as providing barrier removal services such as expungement and driver license reinstatement assistance, among others. Section 3 information continues to be included in MDHA’s quarterly newsletters. These meetings give MDHA the opportunity to showcase Section 3 activities and to make partners and residents aware of ongoing efforts. Section 3 Work Readiness Program assists with online job application assistance, resume building, and barrier removal for those with transportation barriers and sees in-person clients at the MDHA Voice Center, in addition to the previously mentioned scheduled events. MDHA also utilizes partner relationships and participates in at least [ten](#) job fairs, both as an employer and as a barrier removal resource. The Section 3 Work Readiness Coordinator has partnered with the Resident Association Coordinator at most annual events, such as Strong Family Day, Night Out Against Crime, Martha O’Brian Center, Music City Community Court, back to school supply giveaways, fresh food giveaways, and monthly Covid vaccination events. These events take place across all MDHA properties and Section 3 opportunities were promoted at each event. The Section 3 Work Readiness Coordinator partnered with MDHA Covid-19 Resource Navigator to provide information on the Covid-19 vaccine, hosting vaccination events, online registration/sign-up for the vaccine, and with coordinating transportation for residents to vaccine sites. Some of the most valuable partnerships for our residents have been with the Davidson County Criminal Court Clerk’s office and Music City Community Court with Judge Rachel Bell which has allowed over \$500,000.00 in fees and fines to be waived, paving

the way for criminal record expunction, driver license reinstatement, and many residents receiving their license for the first time.

The 2023 Action Plan allocated CDBG funds to pay for staff to provide employment services to connect LMI persons to employment opportunities associated with housing construction and redevelopment projects undertaken by MDHA in Housing Target Areas, with the goal to provide Section 3 opportunities.

The program served over 1,500 clients in the 2023 PY. It does the following five things to prepare and connect residents to employment opportunities:

- Work with residents to address barriers that have historically limited employment opportunities such as assisting with driver license reinstatement, expungement, resume creation, interviewing skills, bank accounts, birth certificates, state identification, etc.
- Utilizing grant funding to provide financial assistance in the form of zero-interest micro-loans to pay traffic tickets, unwaivable court costs, reinstatement fees, and other items that will give our residents increased odds for success. An example of which is a loan for a laptop for a resident that is enrolled in a training program.
- Connect residents to job training programs that align with forecasted job opportunities.
- Connect residents to job opportunities through direct outreach, job fairs, and communications with contractors and sub-contractors on MDHA properties.
- Identify resident-owned businesses that qualify as Section 3 businesses, as well as businesses that employ the requisite percentage of Section 3 employees so that they are eligible for contracts through the agency, which increases employment options on two fronts.
- Services have been expanded to include MDHA groundskeepers and maintenance techs, many of whom come from housing. We have provided funding for vision saving surgery for a tech, who discovered the extent of his vision issues after failing the vision test for his driver license reinstatement. Another tech, who obtained his license for the first time through the program encountered severe dental issues, and we issued a loan for the amounts that insurance would not cover, as well. Additionally, MDHA's Human Resources Dept. assist with micro-loans for deserving staff who need reinstatement or expunction allows for promotions within the agency, thereby increasing the salaries of our employees and increasing morale. The program continues to expand services recently assisted with continuing education training programs, dentures, eyeglasses, and partnered with Affordable Housing to prevent evictions and provide financial empowerment courses.

Since May of 2022, MDHA has been planning the implementation of Community Choice Demonstration

Program, which provides an opportunity for participating families to move to low-poverty/high opportunity areas. We have identified high-opportunity areas and have established higher payment standards in these areas. These higher payment standards will apply to all participants and not just those who enroll in program. Those who enroll and are assigned to services group receive a variety of services, including financial assistance and landlord signing bonuses. MDHA launched the program in August 2022, and to date, just over 400 families have been enrolled.

MDHA's partnership with Corner to Corner for a microenterprise program, served 112 potential businesses during PY 2023.

Several CDBG-funded programs place an emphasis on providing opportunities to federally subsidized housing residents.

To help expose children to job skills and a healthy lifestyle at an early age, the Summer Youth Program requires agencies to include a job training or healthy lifestyle component in their curricula. During the 2023 PY, the MDHA partnered with the Mayor's POWER initiative to provide summer work opportunities for youth ages 14-16. 131 youth participated in the MDHA sponsored program.

The Coordinated Entry assessment and prioritization process became operational in Nashville in January 2018. In the summer of 2020, staff at OHS worked with community partners to refine CE (CE) to standardize the way individuals and families at risk of homelessness or experiencing homelessness are assessed for, and referred to, the housing and services they need for stability. OHS continues to review the assessment and prioritization process for CE to ensure that it is equitable and that the community is housing the most vulnerable individuals and families. The traditional tool for this in Nashville has been the Vulnerability Index - Service Prioritization Decision Assistance Tool (VI-SPDAT), but it has proven to have had racially biased results, and OHS staff has been meeting for months with key stakeholders to research alternative methods that are more just. With the support of HUD Technical Assistance, OHS staff took part in a series of community workshops to learn best practices for prioritization and begin the community-wide process of redesigning the assessment tool.

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In addition to the Financial Freedom and Homebuyers program MDHA administers the Family Self-Sufficiency (FSS) Program and the Section 3 Workforce Readiness programs that : help individuals utilize free job training and education from service partners such as the Urban Leage of Middle Tennessee, Goodwill Industries, and Nashville State Community College. The Family Self-Sufficiency (FSS) Grant Program is a long-term initiative that encourages and assists residents in achieving individualized goals, attaining financial independence and home ownership, for those who seek to become homeowners. Intensive goal-driven case management and making linkages for wrap-around services are fundamental components of this initiative. The types of services received through the grant programming are similar to those offered by the other MDHA Resident Services Coordinators, but these grant-funded activities are typically more intensive and offer case management up to 5 years.

The Section 3 Work-force readiness program, counsels resident job seekers to prepare for employment by offering job readiness training, referrals to free career training and offers mini loans to purchase work ready items such as uniforms, boots, eyeglasses and more. Since June 2023 the FSS program has grown to a case load of 83 families and the Section 3 job readiness program has offered service and outreach to 379 families.

In early 2024, the MDHA Resident Services Department partnered with Wilson Bank and Trust to offer MDHA homebuyers the MDHA mortgage interest buy-down program. Interested participants who complete the MDHA Financial Freedom and Homebuyers program are eligible to receive a 1% APR interest rate reduction on a 30-year fixed-rate mortgage.

Resident Services offers a host of additional services that promote self-sufficiency and seek to reduce poverty in PBRA affordable housing communities. Through the HUD-funded Community Choice Demonstration grant, the Resident Services program has helped 56 families utilize their Housing Choice Voucher to relocate from high-poverty zip codes to Nashville's "Opportunity Zones," which offer better education, more services, and safer neighborhoods.

During the summer of 2023 through June 2024, the Resident Services Team hosted many events to merge self-sufficiency resources with MDHA families, including sponsoring summer internships for 4 MDHA teenage residents, awarding five \$2,000 scholarships to MDHA college-bound students, hosting one Habitat for Humanity pre-enrollment sessions at an MDHA property. The Connect Home program was also offered to senior citizens and high school students. The Connect Home program is designed to narrow the digital divide between MDHA residents. Participants received computer hardware training and an introduction to the software and were given laptop computers. Through the end of 2023, 258 total Connect Home participants were served.

Actions taken to develop institutional structure. 91.220(k); 91.320(j)

MDHA works closely with Metro agencies, nonprofits, and stakeholders to overcome gaps in institutional structure and enhance coordination. MDHA staffs actively participate in community forums on affordable housing, homelessness, and community/neighborhood development. From this active participation, comes dialogue on needs and strategies to address those needs.

Within MDHA, CPD programs are managed by the Community Development Department with teams that focus on housing programs, homeless assistance, and non-housing community development. Each of these teams is led by a staff person with knowledge and experience in administering such programs. A compliance specialist, who is independent from the grant administration teams, monitors these programs.

The Metro Nashville community has a number of qualified and experienced nonprofits that assist MDHA in the implementation of the Consolidated Plan programs. Many of the existing programs that are administered by MDHA have been redesigned for efficiency in the last several years as funding priorities have shifted. During this time, MDHA has continued to expand efforts to increase the number of opportunities for participation from outside organizations.

MDHA has experienced Community Housing Development Organizations (CHDOs) that continue to complete HOME funded development activities in an expedient manner. Additionally, MDHA partnered with the Mayor's Office and the Metro Housing Trust Fund Commission in 2016 to utilize CDBG funds to provide nonprofit capacity building with an emphasis on affordable housing development and preservation. The program consisted of two phases, the first phase focused on organizational and financial management and a second phase provided an in-depth understanding of the analysis, financing and development of affordable rental housing. 26 organizations participated in the program.

On July 1, 2023, the Metropolitan Homeless Impact Division, a subsection of the Metropolitan Social Services Department, became a standalone Department called the Office of Homeless Services (OHS) by ordinance of the Nashville Metro Council. OHS increased the number of its homeless outreach specialists from four to

eight. The role of these eight staff is to coordinate within and outside the Metro government to serve people experiencing homelessness, including those living outdoors. This has solidified Metro's approach as trauma-informed, rather than punitive, incorporating offers of assistance, connecting people to mainstream resources and conducting in-field assessments, all of which help to decrease the amount of time that one experiences homelessness. Citizens throughout Nashville and staff at agencies reach out to OHS and report concerns or complaints regarding homeless encampments and other activities. OHS coordinates with local providers, including homeless outreach teams, to link people with needed services, address and de-escalate potential confrontations, and avoid arrests or unsafe outcomes. In May 2024, people who lived in emergency shelters had been experiencing homelessness for an average of 3 years and 6 months. People who lived outdoors had been experiencing homelessness for an average of 4 years and 1 month. Without the support of an array of partners in the public and private sector, nonprofits cannot decrease this number. Metro Government collaborates with private partners to leverage resources around homelessness, and coordinates outreach in four designated quadrants of Nashville to integrate people with services and offer housing options to those experiencing homelessness.

A consultant hired by the Mayor's office in 2022 did a performance study on homelessness and affordable housing programs in Metropolitan Nashville-Davidson County. This report, released in May 2022, recommended that the duties of the CoC Collaborative Applicant be transferred from MDHA to Metro's soon-to-be-established Office of Homeless Services. Based on this recommendation, Nashville's CoC General Membership voted in November 2023 to designate the city's Office of Homeless Services (OHS) as Collaborative Applicant. Conversations are ongoing with HUD Field Office staff in Knoxville and Desk Officers in Washington about the transition, and MDHA awaits their approval for the FY2023 CoC Planning Grant to be assigned by MDHA and assumed by OHS. As part of this request, an MOU was signed by both agencies in mid-May 2024 outlining key responsibilities and MDHA's reimbursement to OHS for eligible expenses. Functionally, staff at the Office of Homeless Services has taken over related CoC duties formerly performed by MDHA staff. They are staffing CoC committees & the CoC General Membership meetings, as well as staffing and facilitating the local CoC process and working with the members of the Performance Evaluation Committee, Nashville's rating and ranking committee, to review and score new and renewal applications to HUD for funding. As the transition finalizes, MDHA's Homeless Coordinator is providing technical assistance with the HUD CoC application process, and collaborating regularly with OHS staff to assure a smooth succession.

Nashville continued to improve in community-wide data collection and HMIS implementation in the 2023 PY. Staff at Metro's Office of Homeless Services (OHS) partner with community providers working with people living outdoors and in shelters to enter data into the city's Homeless Management Information System (HMIS) and Coordinated Entry, and pull monthly street outreach reports, highlighting an aggregated,

unduplicated number of people living outdoors as well as their gender, race, age, length of homelessness, Veteran status, income/benefits, disability, etc. This data is collected regularly, providing the city with solid statistics about people sleeping in sheltered and unsheltered locations in Nashville. OHS is formalizing a partnership with the Nashville Rescue Mission (the largest shelter in Nashville), to import the Mission's data into HMIS, which promises to offer a clearer picture of homelessness in the city.

**Actions taken to enhance coordination between public and private housing and social service agencies.
91.220(k); 91.320(j)**

MDHA staff regularly attends meetings of affordable housing providers which are also attended by representatives from social service agencies. These meetings serve as an opportunity for attendees to network and keep abreast of what is happening in the community. MDHA staff also attends meetings of the Metropolitan Trust Fund Commission that is charged with allocating Barnes Funds to affordable housing projects. The MDHA Board of Commissioners also appoints a representative to serve on the commission. Additionally, MDHA staff work closely with the Mayor's Office of Housing to ensure effective coordination of federal and local housing resources.

The CE assessment and prioritization process became operational in Nashville in January 2018. In the summer of 2020, staff at OHS worked with community partners to refine CE (CE) to standardize the way individuals and families at risk of homelessness or experiencing homelessness are assessed for, and referred to, the housing and services they need for stability. OHS continues to review the assessment and prioritization process for CE to ensure that it is equitable, and that the community is housing the most vulnerable individuals and families. The traditional tool for this in Nashville has been the Vulnerability Index - Service Prioritization Decision Assistance Tool (VI-SPDAT), but it has proven to have had racially biased results, and OHS staff has been meeting for months with key stakeholders to research alternative methods that are more just. With the support of HUD Technical Assistance, OHS staff took part in a series of community workshops to learn best practices for prioritization and begin the community-wide process of redesigning the assessment tool.

Persons living with HIV/AIDS are provided services through the network of sponsor agencies in the Metropolitan Statistical Area (MSA), which includes Davidson and 13 surrounding counties. These services include short-term rent, mortgage and utility assistance (STRMU); facility based housing and supportive services to include case management, nutritional needs, legal aid, etc. Case managers from sponsor agencies help to guide their clients throughout the network of available assistance programs, such as Ryan White Part B and HOPWA to provide the most comprehensive level of assistance for housing, health and supportive needs.

Identify actions taken to overcome the effects of any impediments identified in the jurisdictions analysis of impediments to fair housing choice. 91.520(a)

The goals set forth in the 2023-2028 Consolidated Plan to address impediments identified in the 2017 Analysis of Impediments (AI) and affirmatively further fair housing and strategies/actions taken to address them during the 2023 PY are outlined in the table below.

Goal	Fair Housing/Impediment	Actions Taken
<p>New Affordable Housing Opportunities</p>	<p>Disproportionate Housing Needs – Lack of affordable housing in a range of unit sizes; Segregation: R/ECAP; Disparities in Access to Opportunity</p>	<p>The Metro Council via the Barnes Housing Trust Fund awarded \$7,760,554 million in grants to 2 nonprofit housing developers in the Round 12 cycle of ARPA to build 65 units of new affordable housing. Of these 65 units, 5 will serve low-income homebuyers.</p> <p>The Metro Trust Fund Commission also recommended awarding over \$36 million to 13 community organizations to create an additional 974 units in a range of sizes from smaller, one-bedroom, micro homes (detached and condos), townhomes, shared living, single-family homes, and apartments for large families. Of these 974 units, 73 will serve low-income homebuyers.</p> <p>Metro has awarded 124 back-tax properties to nonprofits for housing development.</p> <p>In Fall 2022 and Spring 2023, Metro Council approved the Barnes Fund’s highest level of funding in its history. Round 10, approved in November 2022, awarded \$19,995,144 in American Rescue Plan Act (ARPA) funding to 15 organizations to create or preserve 848 units of affordable housing. Three organizations also received 14 parcels of Metro-owned delinquent tax lots. In Round 11, approved in June 2023, 12 organizations received a total of \$15,813,262 and 11 parcels of Metro-owned delinquent tax lots. The funding was a combination of \$6.5M ARPA funds and \$9.3M in Barnes general funding. The result was 549 total units: 369 Barnes-funded rental and homebuyer units, 44 Barnes-</p>

		<p>funded rehab units, and 136 Older Adult Rental units funded by ARPA.</p> <p>For the 2022 & 2023 PY's, MDHA combined available funding and awarded HOME funds in the amount of \$4,586,184.37 to two (2) nonprofit developers and two (2) for profit developers for use in the construction of affordable housing which will result in 60 additional HOME-assisted and 530 affordable rental units and twenty (20) homeownership units being added to the affordable housing inventory upon completion. The 2022-2023 RFA provided provide bonus points for projects outside of R/ECAP areas and 1 project containing 7 HOME-assisted and 286 affordable units was located outside of R/ECAP areas.</p> <p>During FY 2023, Metro Council approved six PILOTs for rental housing developments, which will provide an estimated tax abatement of \$17,486,940 over a ten-year period to enable the creation of 864 units of affordable housing.</p>
Affordable Housing Preservation	<p>Disproportionate Housing Needs – Loss of affordable housing Lack of assistance for housing accessibility modifications;</p>	<p>Metro's Trust Fund Commission Round 13 of the Barnes Fund included a recommendation of over \$1.9 million dollars toward single-family home rehabilitation for low-income homeowners. Funding included monies for critical home repairs for aging adults to remain in their homes, home rehabilitation in rapidly changing neighborhoods, and sustainability upgrades to improve energy impacts on low-income homeowners.</p> <p>CDBG funds were used to preserve 178 units of existing affordable housing through several home rehabilitation activities</p>
Support for Homeless & Persons with HIV/AIDS	<p>Disproportionate Housing Needs Disparities in Access to Opportunity</p>	<p>Construction is now complete on 90 new units of permanent supportive housing at The Strobel Center for homeless persons with space for services onsite using \$25,000,000 in local General Obligation Bonds. The grand opening was held on July 18, 2024.</p>

		<p>Substantial progress has been made on activities/projects that received funding in conjunction with the \$50 million Housing First Initiative utilizing American Rescue Plan (ARPA) funds that were approved by Metro Council in 2022. The funding initiative dedicated resources to Affordable Housing Gap Loans (further described below), Housing First support services, temporary housing, landlord engagement efforts and competitive grants for local support service providers. Information on the results of this funding initiative as of May, 2024 can be viewed at the following link:</p> <p>https://www.nashville.gov/sites/default/files/2024-05/American-Rescue-Plan-Report-May-2024.pdf?ct=1716391762</p> <p>During the 2023 PY, ESG/HOPWA funding assisted 1688 persons with Shelter and essential services; 126 persons with Prevention; 231 persons with Housing Operations including Short Term Rent Mortgage assistance, Project Based Rent Assistance, Tenant Based Rent Assistance, and Transitional/Short Term Rent Assistance; and 3425 persons with Permanent Housing Placement, Supportive Services and Outreach.</p> <p>CDBG funds were utilized to pay rent/utility deposits for 366 Homeless individuals so that they could access housing.</p> <p>CDBG-DV funds for supportive services assisted 633 Persons.</p> <p>CDBG-CV funds paid for the rehab of Multifamily Housing adding 8 new units of Permanent Supportive Housing to the inventory.</p>
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CR-40 - Monitoring 91.220 and 91.230

Description of the standards and procedures used to monitor activities carried out in furtherance of the plan and used to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements

Results of audit/monitoring activities are used as management tools to strengthen MDHA and its funding partners. In Program Year 2023/2024, MDHA's compliance specialist focused on the following community development programs: CDBG, HOME, HOPWA, HOPWA-CV, and ESG (as of the date of the CAPER), and 2010 CDBG-DR. In addition to monitoring these programs, MDHA's Compliance Specialist also accompanies MDHA's Collaborative Applicant staff when they monitor CoC grant recipients and reports any findings to the CoC Performance Evaluation Committee (PEC).

The Compliance Specialist monitors each program in accordance with HUD rules and regulations, as well as contractual requirements. Generally, all HOPWA subrecipients are monitored on an annual basis via on-site or desk reviews. The ESG subrecipients are monitored on-site following a risk analysis. Risk factors include the type of activity, subrecipient experience, the dollar amount of the grant award, staff turnover, and invoice frequency. All ESG and HOPWA reimbursement requests are subject to desk reviews. Desk reviews allow MDHA to check for cost allowability and ensure sufficient back-up documentation is in place before a reimbursement request is processed and paid.

The HOME program is monitored following a risk analysis. Risk factors include the type of construction, developer experience, the number of HOME units, size of the grant award, property ownership status, last inspection date, and any issues noted in progress reports and/or project files. MDHA uses a variety of methods to monitor, including on-site reviews/physical inspections and desk monitoring. Additionally, MDHA, as the Housing Authority for Nashville-Davidson County, administers the Section 8 Housing Choice Voucher Program. Many HOME properties contain MDHA Section 8 voucher holders. This allows MDHA to pull the annual HQS inspections, lease information and income verifications to supplement and satisfy the compliance requirements for those HOME units.

The CDBG program is monitored during different stages of project completion and throughout the time period established in subrecipient grant agreements. During the monitoring, program files and individual client/property files are reviewed for overall HUD program compliance.

MDHA's Compliance Specialist utilizes the HUD Monitoring Desk Guide to determine compliance. Additionally, subrecipients are required to provide match documentation and regular reports on their achievement of contractual objectives as a requirement for reimbursement. Following the on-site

visit, after all information is compiled, the Compliance Specialist provides the agency with a follow up letter detailing any findings or concerns noted at the time of the visit. Agencies have 30 days to respond to requests for further documentation on findings/concerns. Once the requested documentation is received, the compliance monitor provides a letter of clearance to the agency for the monitoring visit. Agencies that have unresolved monitoring findings will not be considered for funding during the next funding cycle.

Before participating in MDHA's programs, the subrecipient must agree in writing to:

- comply with all federal, state and local laws relating to fair housing and equal opportunity,
- operate their facilities and services and conduct their outreach on a nondiscriminatory basis, and
- adopt policies to ensure effective communication with applicants, beneficiaries, and members of the public who have hearing, vision, or speech impairments regarding the availability of accessible services, activities, and facilities.

Minority Business Outreach Policy

It is the policy of the Metropolitan Government of Nashville and Davidson County to promote full and equal business opportunities for all persons doing business with the Metropolitan Government by increasing the purchase of goods and services from minority and women-owned businesses within the area of the Metropolitan Government. It is further the policy of the Metropolitan Government that firms seeking to participate in contracting and procurement activities with the Metropolitan Government are not prevented from doing so on the basis of the race or gender of their owners and that the Metropolitan Government not be a passive participant in any private scheme of discrimination.

MDHA administers the HOME and CDBG programs on behalf of the Metropolitan Government of Nashville and Davidson County, and it is MDHA's policy to provide minorities, women, and small business enterprise equal opportunity to participate in all aspects of contracting and purchasing programs, including but not limited to, participation in procurement contracts for equipment, professional services contracts, and construction contracts. The Diversity Business Policy can be found at <http://www.nashville-mdha.org/diversity-business-enterprise-program/>.

Comprehensive Planning

MDHA is the lead agency for the development and administration of the Consolidated Plan for Nashville-Davidson County. The mission of MDHA is to create affordable housing opportunities for Nashvillians, nurture neighborhoods, and build a greater downtown. Within MDHA, the Community Development Department is responsible for administering the Consolidated Plan and its related programs. The

Community Development Department is located at 712 South Sixth Street, Nashville, Tennessee 37206, and can be reached by telephone at (615) 252-8505.

The 1st Program Year (2023) Action Plan aligned with the strategies outlined in the 2023-2028 Consolidated Plan. The 2023 Action Plan was developed with extensive outreach to and input from citizens and community development partners. Additionally, MDHA looked to make sure any updates aligned with initiatives of other plans in the City such as NashvilleNext. The planning process and list of participants is described in the 2023 Action Plan.

During the 2023 program year, MDHA relied on a strong network of nonprofit partners and other organizations to assist in program delivery and worked with key Metro government agencies in implementing housing and community development strategies. MDHA publicized its plans, reports, and accomplishments through its website, print media, and community meetings. MDHA continues to participate in and collaborate on initiatives that further the objectives of the Consolidated Plan.

Citizen Participation Plan 91.105(d); 91.115(d)

Description of the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports.

The requirements of MDHA’s Citizen Participation plan pertaining to performance reports are provided below:

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

Public Notice & Publication

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

Public Hearings

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

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

Public Comments

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

Information

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

Citizen Participation Opportunities regarding the 2023 CAPER

Notice of the public hearing and request for public comment were advertised in *The Tennessean*, *The Tennessee Tribune*, and *Azul615 (a Spanish publication)*. In addition, notices were posted on MDHA's website and social media outlets (Facebook, Instagram, Twitter, and Google+) and were emailed to stakeholders, partners, and members of the public on MDHA's email distribution list and who attended prior public meetings. Notices were provided to groups representing minorities and persons who speak languages

other than English. A copy of the Public Notice is provided in Appendix A.

The public comment period began on August 7, 2024, and will conclude at 10:00 a.m. on August 23, 2024. Citizens are provided an opportunity to comment on the annual report at a virtual and in person public hearing to be held on Wednesday, August 21, 2024, 6:00 p.m. via Zoom and at the Vine Hill Studio Apartments Community Center location. A summary of public comments received during the comment period and at the public hearing and MDHA’s responses is included in Appendix B.

CR-45 - CDBG 91.520(c)

Specify the nature of, and reasons for, any changes in the jurisdiction’s program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.

In 2023, MDHA continued to implement activities and strategies outlined in the 2023-2028 Consolidated Plan for CPD programs.

MDHA staff continues to use a tracking system to attempt to ensure sure all programs and activities remain on track and goals are met. This tracking system was established specifically to review expenditures on a regular basis, especially those of CDBG projects, to make sure all projects remain on track and to take appropriate measures to reallocate funds for any stalled projects. The goal of this tracking system is for MDHA to meet the required expenditure ratios for any given year at least three months prior to the regulatory deadline. As of August 1, 2024, CDBG funds available to draw totaled 70% of the 2023 Annual Allocation, which is well below the 1.5 expenditure requirement.

Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?	No
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[BEDI grantees] Describe accomplishments and program outcomes during the last year.
N/A

CR-50 - HOME 91.520(d)

Include the results of on-site inspections of affordable rental housing assisted under the program to determine compliance with housing codes and other applicable regulations

Please list those projects that should have been inspected on-site this Program Year based upon the schedule in §92.504(d). Indicate which of these were inspected and a summary of issues that were detected during the inspection. For those that were not inspected, please indicate the reason and how you will remedy the situation.

2101 Eastland Avenue (Porter East) – 8 units

1611 23rd Ave N- 1 unit

1414 4th Ave N – 10 units

850 Richards Rd – 9 units

1900 A&B 14th Ave – 1 unit

East River Place - 714 Ramsey Street / 201 N 8th Street – 11 units

705 Woodland St – 25 units

5515 Scruggs Lane – 35 units

312-314 Williams Ave – 26 units

501 Forrest Park Bend – 11 units

1810 A Osage St – 1 unit

All units received HQS inspections during the 2023 PY, and no issues were found.

Provide an assessment of the jurisdiction's affirmative marketing actions for HOME units. 92.351(b)

All Subrecipients/CDHOs/owners participating under the HOME Program are required to provide an Affirmative Marketing Plan for all HOME-assisted housing containing more than five (5) units for MDHA's review before entering into the developer agreement. The developer agreement with MDHA requires developers to adhere to the following requirements and practices in order to carry out MDHA's affirmation marketing procedures and requirements:

- Distribute information to potential owners and tenants about Fair Housing Laws and MDHA's Affirmative Marketing Policy.
- Use the Equal Housing Opportunity logo and non-discrimination standard statement on all advertising for properties and on all tenant/owner applications.

- Visibly display a Fair Housing Poster in the office where tenants/owners pick up applications.

MDHA, as well as each Subrecipient, CHDO/owner that has a developer agreement with MDHA, must maintain the following records in their respective place of businesses to document their efforts to comply with affirmative marketing requirements:

- Maintain copies of all advertisements related to vacancies or sales in the development, showing the method used to advertise and the dates of advertising;
- Keep samples and copies of all information related to the development provided to organizations and groups serving lower income and minority families and individuals;
- Maintain logs related to the development showing names and dates of contacts made to inform the community and potential residents of housing opportunities;
- Maintain information on the racial, ethnic and gender characteristics of potential homeowners and tenants for the retention periods required by 24 CFR Part 92.508(c).
- Maintain information from tenants/owners on how they were informed that units were available.

MDHA continuously evaluates the success of affirmative marketing actions to see what improvements, if any, are needed and will take corrective actions as needed when affirmative marketing requirements are not met. Compliance with affirmative marketing requirements for Subrecipients/CHDOs/owners is a component of the monitoring process. For projects reviewed during the 2023 Program Year, no deficiencies were found.

An integral part of MDHA's Affirmative Marketing Plan is to inform the public, potential homeowners, tenants, subrecipients, CHDOs and owners about Federal Fair Housing Laws.

MDHA took the following actions during the 2023 Program Year to promote awareness of the need for affirmative marketing and Fair Housing Laws in accordance with the Affirmative Marketing Plan:

Two sections on the MDHA website are devoted to providing information on the Federal Fair Housing Laws. The Information available at <https://www.nashville-mdha.org/mdha-fair-housing/> outlines MDHA's commitment to following Fair Housing Laws and provides information for residents and the public on how MDHA ensures equal access in its programs and complies with civil rights requirements.

The information available at <http://www.nashville-mdha.org/fair-housing/> provides information on the [2017 Analysis of Impediments to Fair Housing Choice](#).

- On April 12, 2024, the Tennessee Fair Housing Council (TFHC) and West Tennessee Legal Services (WTLs) co-sponsored the 2024 Fair Housing Matters Conference. This was an all-day webinar with multiple sessions as follows: Fair Housing Basics, Fair Housing and Real Estate Advertising, FHA Accessibility Requirements, Taking a Deeper Dive into Fair Housing, and FHA Protections for LGBTQIA+ People. In addition, the conference’s opening session included a Fair Housing Month Proclamation from Nashville’s Mayor presented by the Director of Nashville’s Housing Division Angela Hubbard, remarks from HUD Regional Administrator Jennifer Riley Collins, and a keynote on the Current State of Fair Housing from HUD Deputy General Counsel for FHEO Sasha Samberg-Champion. Real-time captioning was provided for all sessions. Six (6) hours of CLE credit for attorneys and one (1) hour of CE credit for real estate agents were offered. There were 98 attendees, and the following extremely positive feedback was provided:
 - The conference was well organized, and the speakers were very knowledgeable.
 - It was very DEI-forward and included great information on accessibility and LGBTQIA+ communities.
 - Very well organized, nice transitions, stayed on time.
 - There are so many things to like. Each session presented information that is important to the community and those involved, and each presenter did a thorough explanation.
 - Learned many new things and strategies from each session.
 - The entire conference was really well done. Even though I have years of Fair Housing experience, I remained engaged for the entirety of the day.

- TFHC has developed two informative videos and shared them on social media. The first video is about the Fair Housing Act, the protected classes, and what someone can do if they experience discrimination. This video is titled “8 things you should know about your rights under the Fair Housing Act.” The second video is about TFHC’s intake process and titled “What to Expect when You Contact the Tennessee Fair Housing Council. Both videos are available in English, Spanish, and ASL. In addition, an image description is available for the English version of both videos. Both videos can be viewed on the TNFC’s YouTube channel at this link:

<https://www.youtube.com/@tennesseefairhousingcouncil2115/videos>

- During the Spring of 2024 including the entirety of Fair Housing Month (April 2024), the TFHC ran 30-second educational fair housing PSAs. The TFHC ran English PSAs in local theaters in their service area, including theaters in Davidson County. The TFHC ran Spanish and English PSAs in streamed media platforms serving people throughout their service area including in Davidson County. The

purpose of the PSA was to inform individuals of the Fair Housing Act's 7 protected classes, including explaining that sex includes sexual orientation and gender identity, and to encourage people impacted by housing discrimination to contact TFHC.

- Posting Fair Housing informational material, including material in multiple languages, in all MDHA offices and properties. In addition, MDHA distributed fair housing materials at various venues to educate Metro residents about their right to fair housing, how to identify discrimination, and how to report it.
- Having an MDHA Fair Housing dedicated phone number where the public can call to obtain information on Fair Housing. A recorded message provides information on how to file a complaint and referral information to local fair housing agencies. A dedicated MDHA staff person checks messages periodically throughout the day, responds to complaints, and tracks the number of calls received during the program year. During the 2023 Program Year, the Hotline received 12 calls related to fair housing and MDHA referred the callers to the appropriate agencies for assistance.

MDHA allocated \$26,000 of CDBG public service funds from multiple Action Plan years of the 2018-2023 Consolidated plan for fair housing counseling, education outreach, and complaint-based testing. In September 2018, MDHA issued an RFA seeking qualified nonprofit organizations or institutions to provide these services throughout Metro Nashville-Davidson County with an emphasis on assisting LMI residents in the housing target areas identified in the 2018 – 2023 Consolidated Plan. The Tennessee Fair Housing Council (TFHC) was the sole respondent and deemed qualified to provide the services. MDHA has had multiple contracts since then with the TFHC to provide the services originally outlined in the RFA. TFHC used the funds and other resources to carry out the following programs/activities for residents of Metro Nashville-Davidson County during the 2023 PY:

- TFHC received 439 inquiries and opened 61 cases for Davidson Countians. TFHC successfully resolved 27 cases for a total value to clients of approximately \$64,537, which does not include the value of TFHC's services. Additionally, the resolutions TFHC obtains for clients are often invaluable to them but do not have a readily ascertainable monetary value. For example, it can be difficult to place a value on successfully advocating for a housing provider to provide a reasonable accommodation to a person with a disability.
- TFHC conducted 64 tests in Davidson County. Testing is like a secret shopping program to assess whether housing providers are complying with the Fair Housing Act. For example, TFHC may create a scenario in which one tester with 3 children and one tester without children both call the same complex seeking a rental unit. By reviewing how both testers were treated by the housing provider, including whether they were both told about any available units, you can determine whether it is

likely that the housing provider is discriminating against potential renters due to familial status.

- TFHC engaged in multiple education and outreach activities in Davidson County and/or reaching Davidson Countians, including but not limited to the following:
 - TFHC reached out to residents of 6 MDHA housing communities during community resource fairs sponsored by MDHA and the Tennessee Justice Center. Specifically, TGHC participated in community resource fairs at Gernert Studio Apartments, Vine Hill Studio Apartments, Hadley Park, Edgefield Manor, Parthenon Towers, and Madison Towers.
 - TFHC's staff attorney trained 94 MDHA staff members about fair housing issues in November 2023.

Refer to IDIS reports to describe the amount and use of program income for projects, including the number of projects and owner and tenant characteristics

During PY 2022, MDHA accumulated PI and Repayment receipts of \$ 322,589.18 that were budgeted in the 2023 Action Plan to be used for activities. These funds were used to pay expenses for the following projects during the 2023 PY:

- IDIS# 7180 – \$178,304.55- MDHA Boscobel IV
- IDIS# 7206 - \$35,501.73 – Habitat for Humanity of Greater Nashville Village by the Creek
- IDIS # 7463 - \$74.00 – WCO Dickerson Pike
- IDIS# - 7194 –\$912.79 - 2021 HOME admin
- IDIS# - 7429 - 12,857.64 - 2022 HOME admin
- IDIS# 7608 - \$19,653.23 – 2023 HOME admin

Describe Actions taken during the last year to foster and maintain affordable housing.

The City engages in multiple programs to preserve and improve existing housing stock and to create additional affordable units. During 2023, MDHA continued efforts to preserve and improve the City's existing housing stock through Homeowner Rehabilitation and Energy Efficiency activities. The demand for these programs continues to be extensive. During the 2023 PY, 177 cases were completed or underway in conjunction with the Homeowner Rehabilitation, Roof Rehab, Accessibility, HVAC Energy Efficiency Program, which provided for replacement of non-functioning or inefficient HVAC units, and CDBG Weatherization Assistance. Additionally, 1 rental rehab projects (units) were rehabilitated in conjunction with the Rental Rehab program.

MDHA also administers the Weatherization Assistance Program (WAP) and the Low-Income Energy

Assistance Program (LIHEAP) in Davidson County. These programs operate in tandem and served 41 households from funding allocations received from July 1, 2023, thru June 30, 2024.

HOME funds from PYs 2019 – 2022 committed to projects currently in various phases of construction will result in the addition of 601 units (70 Home-assisted) to the affordable inventory within the next year. All rental projects funded by HOME must benefit households with incomes at or below 60% AMI and all CDBG funded rental projects must benefit households with incomes at or below 80% AMI.

For the 2022 & 2023 PY's, MDHA combined available funding and awarded HOME funds in the amount of \$4,586,184.37 to two (2) nonprofit developers and two (2) for profit developers for use in construction of affordable housing which will result in 60 additional rental units and twenty (20) homeownership units being added to the affordable housing inventory upon completion.

During FY 2023, Metro Council approved six PILOTs for rental housing developments, which will provide an estimated tax abatement of \$17,486,940 over a ten-year period to enable the creation of 864 units of affordable housing.

In Fall 2022 and Spring 2023, Metro Council approved the Barnes Fund's highest level of funding in its history. Round 10, approved in November 2022, awarded \$19,995,144 in American Rescue Plan Act (ARPA) funding to 15 organizations to create or preserve 848 units of affordable housing. Three organizations also received 14 parcels of Metro-owned delinquent tax lots. In Round 11, approved in June 2023, 12 organizations received a total of \$15,813,262 and 11 parcels of Metro-owned delinquent tax lots. The funding was a combination of \$6.5M ARPA funds and \$9.3M in Barnes general funding. The result was 549 total units: 369 Barnes-funded rental and homebuyer units, 44 Barnes-funded rehab units, and 136 Older Adult Rental units funded by ARPA.

Master planning for four MDHA sites is complete (Cayce Place and Napier Place & Sudekum Apartments, and Edgehill Apartments). Cherry Oak Apartments completed construction in 2024, and 5th & Summer and Park Point East are under construction, with anticipated completion dates of Summer 2025 and Fall 2026, respectively. The Cayce Utility Phase 1B project to support redevelopment in the Cayce neighborhood was completed in 2023. Design work is underway for a central greenspace that will serve as a civic and social hub of the Cayce Place Transformation. All of these contribute mixed-income housing to the Cayce neighborhood and support a vital community. Site and security improvements are being installed at Cumberland View. MDHA's goal is to replace all subsidized housing one-for-one while adding new affordable units, workforce (80 – 120% AMI) and market-rate units at our six largest neighborhoods: Cayce Place, Napier Place, and Sudekum Apartments, Edgehill Apartments, Cheatham Place, Andrew Jackson Courts, and Cumberland View.

Construction is now complete on 90 new units of permanent supportive housing at The Strobel Center for homeless persons with space for services onsite using \$25,000,000 in local General Obligation Bonds. The grand opening was held July 18, 2024.

CR-55 - HOPWA 91.520(e)

Identify the number of individuals assisted and the types of assistance provided

Table for report on the one-year goals for the number of households provided housing through the use of HOPWA activities for: short-term rent, mortgage, and utility assistance payments to prevent homelessness of the individual or family; tenant-based rental assistance; and units provided in housing facilities developed, leased, or operated with HOPWA funds.

Number of Households Served Through:	One-year Goal	Actual
Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family	275	163
Tenant-based Rental assistance	19	7
Units provided in permanent housing facilities developed, leased, or operated with HOPWA funds	50	49
Units provided in transitional short-term housing facilities developed, leased, or operated with HOPWA funds	20	12
Total	364	231

Table 14 – HOPWA Number of Households Served

HOPWA funds also provided assistance for Permanent Housing Placement. However, this is not automatically accounted for in the tables above. The expected program year total was 60 for PY 2023. The actual program year total was 60 for PY 2023.

Narrative

Summary

Housing Opportunities for Persons with AIDS (HOPWA) provides housing assistance and supportive services for low-income people with HIV/AIDS and their families. Nashville-Davidson County first became eligible to receive HOPWA funds as a formula grantee in 1997, and MDHA was designated as the local agency to administer HOPWA funds.

Purpose

People with AIDS (PWAs) and other HIV-related illnesses often face desperate situations as their ability to work (and therefore their income) declines and their health care expenses mount. Homelessness and lack of adequate medical care threaten both family stability and the health of the affected person. HOPWA helps low-income PLWHAs and their families by providing funds for secure housing that can serve as a base for health care and other services. To receive funds, the program requires States and localities to set long-term strategies to meet the housing needs of low-income PLWHAs and their families, which encourages communities to better coordinate local and private efforts to serve PLWHAs.

Distribution of HOPWA Funds among Categories of Housing Needs

HOPWA funds may be used to assist people with AIDS/HIV living in the EMSA- Eligible Metropolitan Statistical Area - which includes the following counties in Middle Tennessee: Davidson, Wilson, Williamson, Rutherford, Cheatham, Dickson, Sumner, Robertson, Cannon, Macon, Smith and Trousdale.

HOPWA funding was distributed to three nonprofit agencies as described in the table below.

Overview of HOPWA Activities

Following a request for proposals, a Review Committee recommended the award of 2023 HOPWA funds to four local nonprofit agencies. The majority of funding is contracted to Nashville CARES, the premiere AIDS service organization in Middle Tennessee. Nashville CARES uses the funds to provide housing and other client-related services to persons with AIDS who are both housed and homeless. Three other agencies used smaller allocations to support additional units of affordable housing, assist with operational expenses, case management, housing services, and outreach. These agencies, and a basic description of each, are listed below and in the more comprehensive HOPWA CAPER which will be available on MDHA's website after August 30, 2024. Fifty-eight percent (58% excluding funds for administrative expense) of the year's HOPWA allocation was budgeted to assist with short-term rent and utility payments, TBRA payments, short-term emergency hotel/motel payments, as well as operating subsidies to assure affordable rental housing to qualifying households; thirty-three percent (33% excluding funds for administrative expense) targeted support services such as case management, front-end housing costs such as rent and utility deposits, food/nutrition and transportation assistance.

During the 2023 PY, the amount of \$2,389,060 was granted to the Nashville, TN EMSA.

2023 HOPWA Distribution	
Housing Assistance (Short-term Rent/Mortgage and Utility Assistance, facility-based operating assistance, TBRA, Motel/Hotel stays, and related administrative share)	\$1,505,275.50

Supportive Service (all else, including rent/utility deposits & related administrative share)	\$883,784.50
TOTAL	\$2,389,060

Table 15 - 2023 HOPWA Distribution

HOPWA Agencies

- Nashville CARES is the primary agency providing HIV/AIDS services and education throughout the thirteen counties of northern middle Tennessee. It currently provides a range of non-medical support services to people with HIV/AIDS and their families throughout the region. Services include case management, individual group counseling, food and nutritional support, home-delivered meals, transportation assistance, practical and emotional support by volunteer CARE teams, outpatient alcohol and drug abuse treatment, hospital visitation, treatment education, and social activities. **\$1,626,609** of HOPWA funding: Short-Term Rent Mortgage Utility Assistance (STRMU), TBRA, Emergency short-term/transitional housing, Case Management and Supportive Services, Transportation and Nutrition.

Street Works provides services to socio-economically disadvantaged individuals living with HIV/AIDS. They provide case management, rental assistance and supportive services. **\$65,780** of HOPWA funding: Short-Term Rent Mortgage Utility Assistance (STRMU), Permanent Housing Placement, Supportive Services and Case Management.

- Urban Housing Solutions is a nonprofit housing development agency that specializes in rental housing for low-income and special needs populations. **\$465,000** of HOPWA funding: Facility-Based Rental Assistance and Supportive Services.

Pearl Transit Corporation partners with dental assistive services to provide dental screenings for dentures, etc. to HIV Clients They provide case management, transportation and dental fabrication services. **\$160,000** of HOPWA funding: Supportive Services and Case Management

Local Jurisdiction Description

The EMSA consists of Nashville/Davidson County and twelve surrounding counties: Cannon, Cheatham, Dickson, Macon, Robertson, Rutherford, Smith, Sumner, Trousdale, Williamson, and Wilson. The Nashville EMSA has a disproportionately high number of Persons Living with HIV and/or AIDS (PLWHA). The majority of the Nashville EMSA’s persons living with HIV/AIDS - PLWHA reside in Davidson County. There were 5,789 PLWHA in the Nashville EMSA at the end of the 2020 calendar year per the Ryan White Part A 2022 Needs Assessment. Data from 2022 should be interpreted with caution due to the impact of the COVID-19 pandemic on access to HIV testing, care-related services, and case surveillance activities in

state/local jurisdictions. Minorities are disproportionately impacted by HIV disease in the Nashville Transitional Grant Area. According to the Ryan White part A 2022 Needs Assessment; Non-Hispanic Blacks hold about half of the incidence and prevalence each year. And notably, the younger populations are representing more and more of the incidence each year. In the past four years these assessments note that the age group with the largest percentage of new cases is the 15-34year old group. Monitoring this trend more closely in the coming years is strongly advised, as this could be the beginning of a shift inside of the MSM population.

A top priority of the local Ryan White Planning Council is assuring that individuals be tested and diagnosed early in the course of the disease so that they may enter care as soon as possible. Retention in care is another critical aspect of the HIV Care Continuum that focuses on individuals seeing an HIV medical practitioner on a routine basis.

Tennessee is divided into five (5) geographical regions for HIV planning purposes for utilization of Ryan White Part B funding. The lead agent for the counties covered in Nashville's EMSA is the local United Way. The Director and staff of HIV/AIDS Initiatives at the United Way have served on the HOPWA Review Committee and provided invaluable resources in identifying ways the HOPWA funding can complement efforts funded by Ryan White while helping avoid duplication of resources. Staff responsibilities for the Ryan White Part A Planning Council fall under the city's Public Health Department. The planning process at the United Way is so comprehensive and developed that MDHA refers to them for guidance and attempts to use HOPWA funds to address gaps that are not - or perhaps cannot be - addressed by their various funds.

Key planning documents used by MDHA when allocating HOPWA resources include the Ryan White Nashville Transitional Grant Area Needs Assessment, conducted by the Metro Public Health Department. This report consists of reviews of the epidemiological data, summaries of data collected via client surveys and focus groups, as well as results of surveys of community service providers, called resource audits. The needs assessments are required for the renewal of federal funding and guide the Ryan White planning entities in promoting a quality CoC for individuals at risk for contracting HIV/AIDS.

Project Accomplishments

Overview

During the program year, our HOPWA program partners provided short-term rent, mortgage and or utility (STRMU) payments to 163 eligible households. An additional 49 households were assisted via affordable rents made possible by operating subsidies funded by HOPWA. Permanent housing placement provided assistance to 60 households. Supportive services, such as bus passes that provided transportation to medical, dental and housing appointments; case management; assistance on deposits for rent and utility payments; health and dental services; and nutrition services like food bags and home-delivered meals were

offered to 2,761 households. Transitional housing and/or emergency hotel/motel stays served 12 households. Tenant Based rental assistance served 7 households.

Grant Management

Oversight of HOPWA project sponsor activities is the responsibility of MDHA's Senior CD Program Manager. In addition to remote monitoring that occurs each time project sponsors submit regular requests for reimbursement for HOPWA activities, sponsors are monitored on-site by MDHA's Compliance Monitor. Project sponsors are selected by a Review Committee, after a Request for Proposals has been issued. Applications are reviewed and scored using a rating tool that employs objective criteria such as applicant capacity and need for the project. Review Committee members include staff of HIV/AIDS Initiatives at the United Way of Metropolitan Nashville, and the staff from Ryan White HIV/AIDS Program at the Metro Public Health Department.

Barriers Encountered and Actions Taken

Several barriers are present for individuals with HIV/AIDS and their families as they confront housing issues:

Lack of stable, affordable housing and/or resources for subsidized housing such as Shelter Plus Care certificates. Many times, subsidized housing developments are not taking applications.

Individuals with no income are extremely difficult to place into permanent housing. In addition, if they move into housing, it is difficult for them to maintain stability. Compounding lack of income in some cases are additional liabilities such as criminal history, poor credit histories, and active substance use. Participants with felony convictions, especially sexual offenders, are disqualified for affordable housing in most cases.

The HOPWA regulations prohibit use of funds to pay the cost of utilities for clients in subsidized housing, even if the actual bills are well above the utility allowances. Extreme temperatures in summer or winter can cause utility bills that eat dramatically into fixed incomes, and place clients at risk of homelessness. Agencies can try to access other local sources for assistance, such as church groups, etc., but this is often difficult.

Several of the individuals served were extremely medically fragile. These individuals are unable to work, have substance abuse issues as well as multiple diagnosed issues around mental health, making it difficult to find stable housing options for them.

Transportation to medical appointments and for housing search is often difficult. Nashville CARES and other sponsors use a portion of their HOPWA grants for bus passes to ease this burden.

The need of African Americans living with HIV/AIDS in urban Nashville for safe and affordable housing has increased. Nashville CARES notes a greater number of persons served with STRMU who require additional STRMU subsidy to remain in stable, permanent housing, and attributes this to increased economic vulnerability. Specifically, on-going issues of a sluggish economy continue to impact employment as evidenced by un/under employment, stagnant wages and/or minimum wage earning. Changes in the Medicare Part D program require individuals on limited/fixed incomes to pay portions of their medication costs. CARES has designed and implemented strategies in their HOPWA program to meet annually recurrent economic challenges faced by fixed- and low- income Persons Living with HIV/AIDS that address rent assistance when clients are faced with high prescription costs, and utility assistance during times of seasonally high bills and short-term (1-2 month) un/under employment assistance. Additional information is provided in the HOPWA CAPER, which will be available for review on August 30, 2024.

CR-60 - ESG 91.520(g) (ESG Recipients only)

ESG Supplement to the CAPER in e-snaps

For Paperwork Reduction Act

1. Recipient Information—All Recipients Complete

Basic Grant Information

Recipient Name	NASHVILLE-DAVIDSON
Organizational DUNS Number	078217668
EIN/TIN Number	620694743
Identify the Field Office	KNOXVILLE
Identify CoC(s) in which the recipient or subrecipient(s) will provide ESG assistance	Nashville/Davidson County CoC

ESG Contact Name

Prefix	
First Name	Shelley
Middle Name	
Last Name	Fugitt
Suffix	
Title	Senior CD Program Manager

ESG Contact Address

Street Address 1	712 South Sixth Street
Street Address 2	
City	Nashville
State	Tennessee
ZIP Code	37206
Phone Number	615-252-6702
Extension	
Email Address	sfugitt@nashville-mdha.org
__Fax Number	615-252-8533

ESG Secondary Contact

Prefix	Mr.
First Name	Emel
Last Name	Alexander
Suffix	
Title	Director of Community Development
Phone Number	615-252-8507
Extension	
Email Address	ealexander@nashville-mdha.org

2. Reporting Period—All Recipients Complete

Program Year Start Date	06/01/2023
Program Year End Date	05/31/2024

3a. Subrecipient Form – Complete one form for each subrecipient

Subrecipient or Contractor Name: PARK CENTER
City: Nashville
State: TN
Zip Code: 37203, 4703
UEI Number: NGY1MN65RJG9
Is subrecipient a victim services provider: N
Subrecipient Organization Type: Other Nonprofit Organization
ESG Subgrant or Contract Award Amount: 30261

Subrecipient or Contractor Name: VILLAGES OF
GLENCLIFF City: Nashville
State: TN
Zip Code: 37211
UEI Number: F7MJBY1EB934
Is subrecipient a victim services provider: N
Subrecipient Organization Type: Other Nonprofit Organization
ESG Subgrant or Contract Award Amount: 20000

Subrecipient or Contractor Name: OPERATION STAND DOWN

City: Nashville

State: TN

Zip Code: 37203, 4709

UEI Number: DLL2E1TCH4X9

Is subrecipient a victim services provider: N

Subrecipient Organization Type: Other Nonprofit Organization

ESG Subgrant or Contract Award Amount: 15000

Subrecipient or Contractor Name: SAFE HAVEN FAMILY SHELTER

City: Nashville

State: TN

Zip Code: 37210, 4104

UEI Number: FKT4QJJ4MKF5

Is subrecipient a victim services provider: N

Subrecipient Organization Type: Other Nonprofit Organization

ESG Subgrant or Contract Award Amount: 63200

Subrecipient or Contractor Name: YWCA

City: Nashville

State: TN

Zip Code: 37215, 1524

UEI Number: CBB1TYJQPLF1

Is subrecipient a victim services provider: Y

Subrecipient Organization Type: Other Nonprofit Organization

ESG Subgrant or Contract Award Amount: 38500

Subrecipient or Contractor Name: THE SALVATION ARMY

City: Nashville

State: TN

Zip Code: 37207, 5608

UEI Number: JCK8L6EKSYL7

Is subrecipient a victim services provider: N

Subrecipient Organization Type: Faith-Based Organization

ESG Subgrant or Contract Award Amount: 104000

Subrecipient or Contractor Name: MARY PARRISH CENTER, THE
City: Nashville
State: TN
Zip Code: 37206, 0009
UEI Number: VZGVV3CG5DM5
Is subrecipient a victim services provider: Y
Subrecipient Organization Type: Other Nonprofit Organization
ESG Subgrant or Contract Award Amount: 12000

Subrecipient or Contractor Name: CATHOLIC CHARITIES OF TENNESSE
City: Nashville
State: TN
Zip Code: 37205, 1401
UEI Number: F7D2GNF1JPA3
Is subrecipient a victim services provider: N
Subrecipient Organization Type: Faith-Based Organization
ESG Subgrant or Contract Award Amount: 40000

Subrecipient or Contractor Name: THE CONTRIBUTOR
City: Nashville
State: TN
Zip Code: 37203
UEI Number: MFRASY53DH29
Is subrecipient a victim services provider: N
Subrecipient Organization Type: Other Nonprofit Organization
ESG Subgrant or Contract Award Amount: 62500

Subrecipient or Contractor Name: ROOM IN THE INN CAMPUS FOR
HUMAN DEVELOPMENT
City: Nashville
State: TN
Zip Code: 37203, 4171
UEI Number: UU5GVXY57G33
Is subrecipient a victim services provider: N
Subrecipient Organization Type: Faith-Based Organization
ESG Subgrant or Contract Award Amount: 27000

CR-65 - Persons Assisted

4. Persons Served

4a. Complete for Homelessness Prevention Activities

Number of Persons in Households	Total
Adults	72
Children	54
Don't Know/Refused/Other	0
Missing Information	0
Total	126

Table 16 – Household Information for Homeless Prevention Activities

4b. Complete for Rapid Re-Housing Activities

Number of Persons in Households	Total
Adults	128
Children	196
Don't Know/Refused/Other	0
Missing Information	0
Total	324

Table 17 – Household Information for Rapid Re-Housing Activities

4c. Complete for Shelter*

Number of Persons in Households	Total
Adults	1,146
Children	530
Don't Know/Refused/Other	0
Missing Information	12
Total	1,688

Table 18 – Shelter Information

**Shelter totals include day shelter and essential services totals as well.*

4d. Street Outreach

Number of Persons in Households	Total
Adults	570
Children	34
Don't Know/Refused/Other	0
Missing Information	0
Total	604

Table 19 – Household Information for Street Outreach

4e. Totals for all Persons Served with ESG

Number of Persons in Households	Total
Adults	1,916
Children	814
Don't Know/Refused/Other	12
Missing Information	0
Total	2,742

Table 20 – Household Information for Persons Served with ESG

5. Gender—Complete for All	Total
Male	1,442
Female	1,276
Transgender	15
Don't Know/Refused/Other	4
Missing Information	5
Total	2,742

Table 21 - Gender Information

6. Age—Complete for All Activities

	Total
Under 18	750
18-24	229
25 and over	1,759
Don't Know/Refused/Other	8

Missing Information	0
Total	2,742

Table 22 – Age Information

The complete ESG CAPER is submitted to HUD via the SAGE system. The Summary report is attached at the end of this report. Aggregate data is kept in a large excel spreadsheet and is available by request by calling 615-252-8505 or emailing consolidatedplan@nashville-mdha.org.

PUBLIC NOTICE
NOTICE OF PUBLIC MEETING & REQUEST FOR
PUBLIC COMMENT

CONSOLIDATED ANNUAL PERFORMANCE EVALUATION REPORT
FOR THE 2023-2024 ANNUAL UPDATE TO THE CONSOLIDATED PLAN

Purpose and Summary: The Consolidated Annual Performance Evaluation Report (CAPER) describes the accomplishments of housing and community development activities funded under the Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), Emergency Solutions Grant (ESG) and Housing Opportunities for Persons with AIDS (HOWPA) programs during the 2023-2024 program year (June 1, 2023, through May 31, 2024).

Public Hearing: MDHA will hold an in-person public hearing on the CAPER at 6 p.m. CDT Aug. 21, 2024, at the Vine Hill Studio Apartments community room at 625 Benton Ave., Nashville, TN 37204. The hearing can also be attended virtually via the below Zoom link:

<https://bit.ly/CAPERAug21>

Public Comment: The CAPER will be available for public examination and comment from 4 p.m. CDT Aug. 7, 2024, until 10 a.m. CDT Aug. 23, 2024. Please see below for ways to access copies of the CAPER:

- Download copies here: <http://bit.ly/MDHACAPER>;
- Request copies by contacting the MDHA Community Development Department at 615-252-8505 or TTY at 615-252-8599;
- Pick up copies between 7:30 a.m. and 4 p.m. Monday through Friday from MDHA's Community Development Department at 712 S. Sixth St., Nashville, TN 37206.

MDHA will receive written comments until 10 a.m. CDT Friday, Aug. 23, 2024. See below for ways to submit comments:

- Hand-delivered to MDHA's Community Development Department at the address listed above;
- Electronically at consolidatedplan@nashville-mdha.org (Subject: CAPER);
- Faxed to 615-252-8533 (Attention: CAPER);
- Mailed to MDHA Community Development Department, Attention: CAPER, P.O. Box 846, Nashville, TN 37202.

Request for Accommodations: MDHA makes every effort to provide reasonable accommodations to assist persons who have a disability. Any person needing assistance in accessing this information or who has other

needs that require special accommodations may contact 615-252-8505 or TTY at 615-252-8599.

Para una traducción español de este aviso, por favor llame: 615-252-8505

如果需要本通知的中文翻译, 请打电话 615-252-8505

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

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

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

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



APPENDIX B

SUMMARY OF PUBLIC COMMENTS AND MDHA'S RESPONSES

Comments or Questions Received during the In-Person and Virtual Public Hearing held on August 21, 2024:

No questions or comments were received during the in-person and virtual public meeting.

Comments or Questions Received during Public Comment Period 8/7/2024 – 8/23/2024:

MDHA Response to Public Comment (attached afterwards):

Thank you for providing comments for the 2023-24 Consolidated Annual Performance and Evaluation Report (CAPER). The primary purpose of the CAPER is to report on accomplishments of activities explicitly funded through the Community Development Block Grant (CDBG), the Home Investment Partnership Program, the Emergency Solutions Grant Program, and the Housing Opportunities for Persons with Aids Initiative. We will consider your comments related to these programs for ongoing reporting purposes.

The CAPER includes information about public housing, the housing choice voucher program, and the Continuum of Care. This information is intended to provide an overview and is not a reporting document for these programs. We will pass along your concerns about these programs to the appropriate individuals directly overseeing these initiatives.

The attached comment was received during the public comment period.



LEGAL AID SOCIETY
OF MIDDLE TENNESSEE AND THE CUMBERLANDS

Clarksville · Columbia · Cookeville · Gallatin · Murfreesboro · Nashville · Oak Ridge · Tullahoma

MDHA Community Development Department
Attention: CAPER
P.O. Box 846
Nashville, TN 37202

Submitted via email to consolidatedplan@nashville-mdha.org

Re: CAPER 2023-24

To whom it may concern:

Thank you for the opportunity to address MDHA's 2023-2024 Consolidated Annual Performance and Evaluation Report (CAPER). We write in support of the report with ideas for growth. The CAPER plan details the incredible work of MDHA and provides actionable steps to continue assisting residents of Davidson County.

This comment is submitted on behalf of the Eviction Right to Counsel (ERTC) program at the Legal Aid Society of Middle Tennessee & the Cumberlands (Legal Aid). Our nonprofit law firm covers a 48-county service area in Middle Tennessee. Our mission is to advance, defend, and enforce the legal rights of low-income and vulnerable people in order to secure for them the basic necessities of life. The ERTC team comprises housing attorneys, advocates, and support staff specializing in representing clients facing eviction in Nashville. Our program is funded by Metro Nashville City Council and carried out alongside partnering nonprofit organizations. In the past year, our coalition has represented and advised hundreds of clients who live in public housing and in properties receiving other forms of assistance.

Public and subsidizing housing are priority areas of representation for our attorneys when considering where to focus the limited resources of our program. As such, Legal Aid and the ERTC Program have a unique perspective on the housing administration in our community. Many of our cases are particularly concerned with voucher preservation, accommodations to transfer vouchers, as well as individuals who have experience facing homelessness.

As is explained further below, ERTC commends MDHA's work in assisting many of these vulnerable clients and also urges MDHA to expand the report to include more transparency regarding utilization rates of assorted programs, to focus more on needs of survivors of domestic violence, to explain plans to increase accessibility for residents with disabilities or limited English proficiency, and to continue working toward homelessness prevention and seamless integration with other social service agencies.

I. The CAPER should include more data regarding voucher application processes and usage rates, such that the community can address any underutilization of available resources.

One of the highlights of this report that ERTC heartily commends MDHA on is the inclusion of 18 mainstream Housing Choice Vouchers reserved each month exclusively for persons experiencing homelessness (Page 21). Many of our clients have experienced or are likely to experience homelessness, so setting aside vouchers specifically for these individuals is a tremendous stride toward reducing the overall number of persons experiencing homelessness in Davidson County.

First, ERTC urges MDHA to include in the CAPER more transparent information regarding the application process for these set-aside vouchers. Such information should be shared not only with housing providers and social service organizations who may refer clients to this service, but also the persons experiencing homelessness to identify whether they would qualify for these vouchers. More transparency as to the requirements may spare MDHA from having an influx of ineligible applicants. In ERTC's experience working with individuals experiencing homelessness, it is vital to ensure that there are clear and supported expectations setting.

Additionally, further clarity on the application process for these vouchers would help to ensure that social service organizations can assist people experiencing homelessness complete required application steps and gather materials that may not be readily available to the persons seeking the voucher. Publishing these steps as an addendum to this report or developing a webpage with a step-by-step guide with a frequently asked questions element would ensure clarity for applicants and create less work by filtering applications that would not qualify.¹

ERTC also advocates for more transparency in the CAPER as to the usage rate of these set-aside vouchers. It is apparent elsewhere in the CAPER that some resources available to unhoused Nashvillians are not being used. Transparency as to how many of the set-aside vouchers are being used would enable advocates to know how best to direct those they assist toward accessing MDHA resources.

ERTC was extremely pleased with the number of vouchers that MDHA distributed and described on page 35 of the report and commends MDHA on the work of adding 103 new landlords to the program during calendar year 2023. Increased landlord participation in voucher programs allows tenants more selection. Many of our clients express the desire to have autonomy in the selection of their placement, so seeing that there are now nearly 700 participating landlords is tremendous.

Unfortunately, in ERTC's experience, voucher holders continue to struggle to find landlords willing to accept their vouchers. **The CAPER could confront this problem head on in two ways: first, by publishing the actual utilization rates of these vouchers, and second, by publishing**

¹ Note that, were MDHA to take the steps of developing such a website for reporting purposes, the site might also serve as a self-service portal for applicants seeking vouchers, where they could submit applications, check their place on waiting lists, and communicate with MDHA staff. Such a website could also include a tracking mechanism that shows these participating landlords, with a database about the properties that accept vouchers.

the number of vouchers that expired during the Program Year because the voucher holder could not locate a suitable unit. Only by being transparent with this information can MDHA begin to work with community members to solve these pressing issues.

II. MDHA should include information about VAWA protections & transfers in the CAPER, including soliciting community feedback on how to ensure transfers are processed expediently.

MDHA published this report to address their progress on the 2023-2028 Consolidated Plan for Housing and Community Development. This Plan addressed the different needs of victims of domestic violence, such as safe housing, removal of barriers to relocation, and for perpetrators to be held accountable.² ERTC agrees that these needs are extremely important to assist victims of domestic violence. However, MDHA fails to address any issues of domestic violence in their performance evaluation. **ERTC believes it is of the utmost importance for the CAPER to address how MDHA is working to achieve the goals outlined in the 2023-2028 Consolidated Plan for Housing and Community Development as they pertain to protection of domestic violence survivors.**

Troublingly, the omission of survivors' rights from the CAPER reflects a failure to address those rights in MDHA's daily operations. MDHA stated that Nashville received more funding this year and will utilize it to focus on transitional/rapid rehousing of families and individuals who are survivors of domestic violence (page 23). While this effort is to be applauded, community members would benefit from more information on exactly how MDHA plans to utilize this funding. Continued transparency will not only give clarity on exactly how these funds will be spent, but will also reassure survivors of domestic violence that MDHA is willing and prepared to protect them.

Additionally, MDHA's focus on rehousing survivors misses an issue closer to home and far cheaper to address: ensuring survivors who are already in MDHA housing can easily move to new, safe homes.

ERTC often assists tenants in MDHA-owned housing in requesting Violence Against Women Act (VAWA) transfers. However, the sad reality is that our clients residing in MDHA property are often waiting over a year to be transferred to a safe property. One ERTC client was forced to remain in the same property for almost two years with her children, living in constant fear that her abuser would return. Our client was adamant and persistent in her communications with MDHA to no avail.

The CAPER should include progress reports on how MDHA is working to ensure survivors can easily access needed transfers. For example, MDHA should designate a VAWA Rights Coordinator to ensure that survivors of domestic violence have access to necessary information

² See 2023-2028 Consolidated Plan for Housing and Community Development and 2023-2024 Annual Action Plan at 107, <https://nashville-mdha.org/wp-content/uploads/2023/06/Nashville-Davidson-2023-2028-Con-Plan-Final-Draft.pdf>.

surrounding their rights and transfer requests. This Coordinator should assist survivors in locating a new unit, instead of requiring the survivor to locate their own new unit. MDHA should also require a timely response to all VAWA-related requests, including implementing internal deadlines.

ERTC recommends that MDHA investigates successful programs, such as Chicago Housing Authority's Emergency Transfer Plan, as it has implemented many beneficial processes. One such process is that they have a policy to move the victim tenant prior to beginning any termination proceedings against the perpetrating household member.

There are many processes that MDHA could implement to ensure that survivors are receiving timely emergency transfers, thus making MDHA properties safer for its tenants. **We encourage MDHA to include information on its internal transfer policies in the CAPER, as well as to solicit community feedback on how those policies can be improved.**

III. MDHA should continue expanding accessibility measures in its programs and services

MDHA has implemented a variety of programs and procedures that greatly benefit individuals experiencing homelessness and individuals residing in MDHA housing. These include a text alert system as part of the Cold Weather Community Response Plan, an online housing portal, and various methods of paying rent. While these are great tools and help many, MDHA fails to address certain accessibility issues with these programs.

First, Metro's Office of Emergency Management, the Mayor's Office, and the Office of Homeless Services implement an annual Cold Weather Community Response Plan (page 19). To notify individuals experiencing homelessness of overflow shelters, individuals can be added to a text alert system, visit the city's website, use a QR code, or call a phone number. This is beneficial to many; however, ERTC often assists clients who do not have access to technology to utilize these services or who have Limited English Proficiency (LEP).

We urge MDHA to address how individuals who desperately need to be assisted by the Cold Weather Community Response Plan can access the information in alternative, more accessible formats. By including this information, ERTC will be better prepared to advise our clients who do not have access to technology or who have LEP.

Second, MDHA stated that they utilize an online portal for its Housing Programs. The online portal also allows tenants to apply for housing, recertify, and pay rent (page 31). This is a great system for many individuals as it removes unnecessary steps and allows for an easier process. **However, the CAPER does not include information about how this portal is made available to tenants with LEP or with disabilities, or what steps are being taken to address those gaps.**

The current MDHA webpage does not have plainly visible help links for LEP or disabled users. According to Metro Nashville Public Schools, there are students from more than 130 countries

enrolled in MNPS, with 21,000 active English learners enrolled. Because Nashville is such a diverse city, making MDHA resources LEP-accessible should be prioritized.

ERTC assisted a client with disabilities and limited access to technology. Because of her disability, she did not know what she owed her landlord. ERTC helped this client obtain a ledger that she could read, along with negotiating a settlement so that she could remain in her home. A more accessible online portal could eliminate the need for ERTC's assistance in matters such as these.

We also urge MDHA to use the CAPER process to determine what additional services could be provided through the online portal. For example, the Chicago Housing Authority uses a portal that allows participants to apply for housing, recertify, pay rent, view program status, request a move, request to make an appointment, view appointments, request to speak to a housing specialist, and more. The webpage is also available in over 50 languages with a simple drop-down box and has a clear notice to assist LEP users.

Third, MDHA states that residents can “pay their rent in person, online with a credit card, or via one of the many retail outlets that accept walk in payments (WIPS).” (Page 31.) This variety of methods to pay rent assists residents in many ways, including, as MDHA acknowledges, allowing residents the option to make in-person payments outside of business hours. However, MDHA does not address whether there is a fee associated with WIPS. ERTC recently had a client who attempted to utilize this system and was charged a fee, which he had not been made aware of.

Any fees charged to utilize WIPS should be clearly stated to tenants and included in this report. MDHA should include how much these charges are to ensure that low-income individuals utilizing public housing are not overcharged. MDHA should also include if they plan to implement any systems that allow for in-person payments without extra fees and outside of regular hours.

IV. MDHA should further address the need for an updated assessment tool.

ERTC appreciates that MDHA recognizes that the Vulnerability Index – Service Prioritization Decision Assistance Tool (VI-SPDAT) is racially biased (page 17). MDHA seems to be taking great care in developing a new assessment tool; however, the need for a new assessment tool should be the utmost priority.

MDHA states that the Office of Homeless Services (OHS) has begun the community-wide process of redesigning the assessment tool, but it fails to provide comprehensive information about this process. **ERTC would find it helpful for MDHA to include their proposed process, such as who will be assisting with this process, how members of the community can contribute, and when implementation is expected.**

ERTC also appreciates the Coordinated Entry (CE) system, as it is useful for many of ERTC's clients; however, it is often only useful once an individual is already unhoused, and the process is not accessible to many clients.

Often, clients come to ERTC when they cannot transfer or place a voucher, which can lead to homelessness. One client called Legal Aid after losing her home and her voucher. She was using

her Section 8 voucher with a private landlord. The house became unlivable due to pests and ignored repair requests. She and her seven children had to move out for their safety. The landlord charged her fees when she broke her lease, and she couldn't afford the fees. While waiting for negotiations, she and her children became homeless because she couldn't transfer the voucher. It would be beneficial if MDHA placed more emphasis on maintaining housing stability for those who are reaching out with issues with such as voucher placement and landlord issues, such as implementing a transition plan for interim voucher placements that could prevent homelessness.

One unhoused ERTC client could not utilize CE on the phone and could only complete an assessment by attending an in-person appointment. CE should be accessible to all individuals facing or experiencing homelessness, especially since MDHA states that "Nashville has more funding than ever to address the needs of families." (page 24).

Due to the process and assessments, CE often can only assist when an individual is already homeless. While this is necessary and ERTC appreciates MDHA's commitment to helping the most vulnerable in the community, **MDHA should focus on homelessness prevention when redesigning the assessment tool.**

V. MDHA should work to process coordination with ERTC and other social service providers.

As mentioned previously in this comment, MDHA's proposed plan is assisting tenants and hard-to-house Nashvillians in new ways, paving the way for other social service providers to develop meaningful action plans to help the most vulnerable people in Davidson County. In that vein, ERTC, and other organizations, would likely be interested in collaborating with MDHA on the execution of action plans listed in this report. Particularly, on page 39 of this report, ERTC is named as one of several "other actions" taken in Metro Nashville over the past few years. Many of our clients live in public and subsidized housing and have vouchers distributed by MDHA. In the past, ERTC has assisted in creating payment plans for MDHA residents through Judge Rachel Bell's off-docket Legacy Court. The degree of overlap is significant with both MDHA and ERTC striving to promote affordable housing initiatives, preventing and reducing homelessness, and we would advocate for the development of a robust partnership over our aligned goals.

In that vein, ERTC would recommend publishing in the CAPER or elsewhere contact information for a main point of contact within MDHA for social service providers, case workers, and other non-applicant persons. Due to MDHA's numerous and far-reaching programs, it can be difficult to connect with the specific person an agency might be trying to reach. ERTC's our experience in the nonprofit and social service space has shown that having a dedicated staff member serving as a public-facing liaison increased not only our effectiveness assisting clients but also allowed us to create relationships with organizations we had not considered. Having this outward facing person could remedy these issues and increase engagement and collaboration from other social service providers that are aligned with this plan.

VI. Concluding Remarks

The Eviction Right to Counsel Program at the Legal Aid Society of Middle Tennessee and the Cumberland is committed to providing legal services to those who are in the most need. Our experience with clients who live in MDHA housing, partnering with MDHA and other community organizations, and our commitment to low-income housing gives us a unique perspective on this report and plan. We hope that these commendations and recommendations will be taken into consideration in the development of this plan as both parties seek to improve the housing environment in Davidson County by promoting affordable housing initiatives, decreasing and preventing homelessness, and ensuring

Thank you for the opportunity to comment on the CAPER and for your consideration of our suggestions. We again would like to voice our support of MDHA's commitment to address housing barriers and housing stability for our community.

Sincerely,

Sydney Butler, Esq.
Staff Attorney

Chaeli Glass, M.Ed
Paralegal

Zane Jud, MA
Project Manager

Elizabeth Leiserson, Esq.
Project Director

APPENDIX C

PR03: CDBG ACTIVITY SUMMARY REPORT

The PR03: CDBG Activity Summary Report showcases all CDBG activity for the PY 2023. This includes older activities that were closed in during the PY as well as those initially funded during the program year. Due to the size of the document (nearly 400 pages), it is available upon request by calling 615-252-8505 or emailing consolidatedplan@nashville-mdha.org.

APPENDIX D

Summary of PY 2023 Accomplishments

Con Plan Priority	Program	Activity Name	Activity Type	Accomplishment	Geographic Priority
Construct New Affordable Housing and Address Housing Barriers	HOME	New Construction (Ownership)	Housing	14 households	Countywide

Construct New Affordable Housing and Address Housing Barriers	HOME	New Construction (Rental)	Housing	36 households	Countywide
Construct New Affordable Housing and Address Housing Barriers	CDBG	Fair Housing	Public Services	23 Persons	Countywide
Retain Affordable Housing Stock	CDBG	Homeowner Rehab, Weatherization, HVAC Replacement, Roof Replacement	Housing	177 households	Countywide

and Maintain Housing Stability		and Accessibility Rehab			
	CDBG	Rental Rehab	Housing	1 households	Countywide
	CDBG	Rental Counseling	Public Service	60 Households	Countywide

Assist Homeless Persons & Persons with HIV/AIDS	CDBG	Housing Assistance for Homeless	Public Service	366 households	Countywide
	ESG	Rapid-Rehousing	Homeless Assistance	324 persons/97Households	Countywide
	ESG	Prevention	Homeless Assistance	126 persons	Countywide
	ESG	Emergency Shelter Operations	Homeless Assistance	1,688 persons	Countywide
	ESG	Street Outreach	Homeless Assistance	604 persons	Countywide
	HOPWA	Short-Term Rent, Mortgage & Utility Assistance	Housing Assistance	163 Households	MSA
	HOPWA	Sponsor Administration	Administration	N/A	MSA
	HOPWA	Facility-Based Rental Assistance	Housing Assistance	49 households	MSA
	HOPWA	Transitional/Short-Term Housing	Housing Assistance	12 Persons	MSA
	HOPWA	Permanent Housing Placement	Housing Assistance	60 Persons	MSA
	HOPWA	Tenant-Based Rental Assistance	Housing Assistance	7 Persons	MSA
	HOPWA	Supportive Services	Housing Assistance	2,761 Persons	MSA

Support Services that Provide Stability	CDBG	Summer Youth Programs & Youth Employment Programs (POWER)	Public Service	1496 youth participated	Countywide
	CDBG	Employment Services	Public Service	82 persons	Countywide
	CDBG	Microenterprise Assistance	Economic Development	112 potential businesses or entrepreneurs –	Countywide
Invest in Underserved Areas	CDBG	Facility Improvements	Facility Improvements	4 projects completed including Kossie Gardner Park and Infrastructure Construction for Cayce Phase 1B	Countywide