

METROPOLITAN NASHVILLE-DAVIDSON COUNTY, TENNESSEE

**THE NASHVILLE-DAVIDSON CARES ACT
SUBSTANTIAL AMENDMENT 3
TO THE
2019-2020 ANNUAL UPDATE
TO THE
2018-2023 CONSOLIDATED PLAN
(2019 ACTION PLAN - PROGRAM YEAR 2)**

Prepared by:

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



On Behalf of:

The Metropolitan Government of
Nashville and Davidson County
September 7, 2021
Final after close of public comment period
on September 3, 2021



Substantial Amendment 3 to the 2019-2020 Annual Update

to the 2018-2023 Consolidated Plan

(2019 Action Plan - Program Year 2)

Executive Summary **ES1**

Action Plan **AP1**

Appendices:

Appendix A - Public Notice

Appendix B - Summary of Comments and Responses

Executive Summary

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

1. Introduction

The Coronavirus Aid, Relief and Economic Security (CARES) Act Public Law 116-136 was signed by President Trump on March 27th, 2020. The Act identified additional funds from Community Planning and Development (CPD) programs administered by The U. S. Department of Housing and Urban Development (HUD), such as Community Development Block Grant (CDBG-CV), to be used to respond to the Coronavirus outbreak. HUD's distribution plan for this additional funding included multiple phases; an initial phase to allow quick access to funding to address the immediate crisis of the rising pandemic and later phases to support on-going pandemic prevention and recovery efforts.

The Metropolitan Development and Housing Agency (MDHA) is designated as the lead agency for the development and administration of the Consolidated Plan and its' related programs, including funds provided via the CARES Act. Within MDHA, these functions are undertaken by the Community Development Department.

To expedite access to the initial and subsequent CARES funding allocations, HUD directed Grantees to prepare substantial amendments to their latest, approved action plan, which was the 2019-2020, Program Year (PY), Action Plan (AP) for Metro Nashville-Davidson County, to allocate the funds to eligible activities/projects.

This Nashville-Davidson CARES Act substantial amendment 3 to the 2019-2020, Program Year (PY) 2, Action Plan (AP) adds a new public service activity allowing CDBG-CV funds to be used to pay for support services for the homeless population and makes adjustments to previously approved activity budget categories to fund the proposed new activity as follows:

Activities	Initial Budget Allocation	Adjustment	Adjusted Total Allocation
Shelter Operations	\$ 700,000.00	\$ 217,920.00	\$ 917,920.00
Acquisition/Rehabilitation for Permanent Supportive Housing for the Homeless	\$ 4,646,875.00	\$ (1,512,659.00)	\$ 3,134,216.00
Support Services for the Formerly Homeless Population	\$ -0-	\$ 1,294,739.00	\$ 1,294,739.00
Total All Activities	\$ 5,346,875.00	\$ 1,512,659.00	\$ 5,346,875.00

HUD guidance for Citizen Participation involving CARES funds allow for a five (5) day, expedited public comment period. Thus, in accordance with the guidance, this substantial amendment 3 was made available for public comment from August 27, 2021 through September 3, 2021.

The new support service activity is described below. The \$1,294,739 to fund this activity is from dollars remaining, after a Request for Applications (RFA) seeking projects to acquire/rehab properties for use as permanent supportive housing for the homeless, only resulted in one project.

CDBG-CV funds being made available via substantial amendment 3 will be made available to pay for costs associated with providing formerly homeless tenants residing in RRH or PSH with **voluntary** access to the following services with the goal of building independent living and tenancy skills to increase self-sufficiency to help them remain housed to prevent/mitigate the spread of the Coronavirus:

- Case management;
- Medical, mental health;
- Substance use treatment;
- Employment and life skills counseling;
- Eviction prevention program;
- Social and recreational events; and
- Tenant advocacy

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

As part of substantial amendment 3 to the 2018-2023 Consolidated Plan, MDHA added a 7th priority goal to the Strategic Plan of Disaster Mitigation/Recovery in response to COVID-19 to be used to track outcomes for activities related to COVID-19, as needed, through the remaining time covered by the plan.

The priority goal of Disaster/Mitigation/Recovery in response to COVID-19 includes the priority needs listed below for the COVID-19 response and implementation. Projects and activities funded via round three (3) of the CDBG-CV of the CARES Act dollars were established based on input from community stakeholders and are shown in the AP20, AP35 and AP38 sections of this substantial amendment 3.

- COVID-19 Prevention Measure Opportunities
- COVID-19 Mitigation Preparation Opportunities

- COVID-19 Mitigation Response Opportunities
- COVID-19 Specific Administration and Planning

Specific objectives related to each COVID-19 goal are discussed in Section AP 20 of this substantial amendment 3.

3. Summary of citizen participation process and consultation process

Priorities identified in Metro Nashville’s 2018-2023 Consolidated Plan included efforts to increase and retain the existing affordable housing stock for lower income households and support facilities and services for the homeless and persons with HIV/AIDS. Additionally, page SP48 of the SP-60 Homeless Strategy section of the Consolidated Plan provides the following: “The most urgent strategy is to develop low-income affordable housing and **“expand support services”** for the most vulnerable populations to avoid their return to homelessness.”

As of August 3, 2021, CoC community partners have used the ESG-CV Rapid Rehousing (RRH) funds to place 451 formerly homeless persons in housing, to prevent the spread of the Coronavirus, with the goal of moving them to Permanent Supportive Housing (PSH) as units become available. Given this success, MDHA consulted with the HUD Technical Assistance Provider (TAP) assigned to Metro Nashville, to facilitate the use of the large infusion of ESG-CV funds, to determine the needs and unfunded gaps (in addition to actual housing units) for the use of the under-subscribed CDBG-CV funds. It was determined that the CARES Act waiver of the 15% public service cap on CDBG funds for program year’s 2019 and 2020 public service activities to prevent, prepare for and respond to the Coronavirus presented an unprecedented opportunity to use the funds to pay for support services to enable the formerly homeless to retain housing. Based on feedback from CoC community partners, it was decided that the unsubscribed CDBG-CV funds should be used to provide one-time, gap funding, to pay for support services for those residing in RRH and being transitioned to PSH as units become available. Using CDBG-CV funds in this manner, will provide necessary services to enable them to maintain housing stability until permanent funding sources can be identified. Partnerships with the healthcare sector, including behavioral and mental health providers, are being developed to ensure long-term supportive services’ funding streams over time.

4. Summary of public comments

A summary of public comments on the draft substantial amendment 3 to the 2019 Action Plan received at the virtual public hearing held on September 1, 2021 is provided in Appendix B.

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

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

6. Summary

Metro Nashville provides weekly COVID-19 updates via the following link on their website:

<https://www.asafenashville.org/updates/covid-19-briefing-metro-public-health-department-of-nashville-davidson-county-mphd/>

The overview/briefing as of August 12, 2021 provided the following:

Cases of diagnosed COVID-19, or SARS-CoV-2, began increasing in Nashville in early July 2021 from the lowest point since reliable testing became accessible in early 2020. Cases are now on pace to meet or exceed the July 2020 peak. Much of this transmission is estimated to be driven by the Delta variant, a strain of SARS-CoV-2 that is more transmissible than other strains of SARS-CoV-2, as well as many other fatal pathogens for which routine immunizations exist. It is currently estimated to be nearly as contagious as chickenpox and far less contagious than measles. Current estimates of its fatality rate are wide-ranging, but indeed, the average age among Davidson County COVID-19 deaths reported this week is 57.4 (N=10) where the overall average death age for all cases since the start of the pandemic is 73 years old (N=961). All but one of the deaths this week were unvaccinated. The one death of a vaccinated individual was extremely rare as there have been only 3 vaccinated COVID-19 deaths in Nashville-Davidson County since vaccines became available. The three vaccinated deaths have had significant comorbidities and were over the age of 65.

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

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

MDHA is responsible for preparing the Consolidated Plan and amendments thereto and the administration of each grant program and funding source, including the funding provided via the CARES Act.

Agency Role	Name	Department/Agency
CDBG-CV Administrator	NASHVILLE-DAVIDSON	MDHA Community Development Department

Table 1 – Responsible Agencies

Narrative

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

Consolidated Plan Public Contact Information

Emel Alexander, Director of Community Development
Metropolitan Development and Housing Agency
712 South 6th Street
Nashville, Tennessee 37206
(Phone) 615-252-8507
(Fax) 615-252-8533
(Email) ealexander@nashville-mdha.org

Treva Gilligan, Assistant Director of Community Development
712 South 6th Street
Nashville, Tennessee 37206
(Phone) 615-252-6732
(Fax) 615-252-8533
(Email) tgilligan@nashville-mdha.org

For comments and general inquiries:
consolidatedplan@nashville-mdha.org

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

1. Introduction

See number 1. In the ES-05, Executive Summary section of this Nashville-Davidson CARES Act substantial amendment 3 to the 2019-2020 AP.

PR-15 Citizen Participation

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

Summarize citizen participation process and how it impacted goal-setting

Metro Nashville's 2018-2023 Consolidated Plan was finalized after an extensive Citizen's Participation process consisting of five (5) Consolidated Plan Workgroup meetings, seven (7) community meetings/public input sessions, and 13 stakeholder consultations, with 181 persons and 84 agencies/groups/organizations participating in the development of the final plan to ensure it truly addressed the needs in Metro Nashville. Three (3) of the priorities identified in the plan are to:

- Increase the number of decent, safe affordable units and help low and moderate income households access affordable;
- Preserve existing affordable housing units and help low and moderate income households retain housing; and
- Support facilities and services for the homeless and persons with HIV/AIDS.

Page SP48 of the SP-60 Homeless Strategy section of the Consolidated Plan provides the following: "The most urgent strategy is to develop low-income affordable housing and **expand support services** for the most vulnerable populations to avoid their return to homelessness."

MDHA consulted with the HUD Technical Assistance Provider (TAP) assigned to Metro Nashville, to facilitate the use of the large infusion of ESG-CV funds, to determine the needs and unfunded gaps (in addition to actual housing units) for the use of the under-subscribed CDBG-CV funds. It was determined that the CARES Act waiver of the 15% public service cap on CDBG funds for program year's 2019 and 2020 public service activities to prevent, prepare for and respond to the Coronavirus presented an unprecedented opportunity to use the funds to pay for support services to enable the formerly homeless to retain housing. Based on feedback from CoC community partners,

it was decided that the unsubscribed CDBG-CV funds should be used to provide one-time, gap funding, to pay for support services for those residing in RRH and being transitioned to PSH as units become available. Using CDBG-CV funds in this manner, will provide necessary services to enable them to maintain housing stability until permanent funding sources can be identified.

Additionally, comments on the draft substantial amendment 3 to the 2019 Action Plan were obtained during the public comment period from August 27 through September 3, 2021 and at the virtual public hearing that was held on September 1, 2021. Details about the public hearing are provided in the Public Notice provided in Appendix A of this substantial amendment 3.

Following the conclusion of the Public Comment Period, substantial amendment 3 to the 2019 Action will be presented to the Metropolitan Council for approval, prior to submittal to HUD.

The Public Notice was advertised in *The Tennessean*, *The Tribune*, and *El Crucero* (a Spanish newspaper). In addition, the Notice was posted at MDHA's website (www.nashville-mdha.org). A copy of the notice is provided in Appendix A. The Notice was widely distributed via email to over 800 partners, government officials, nonprofit organizations, businesses, neighborhood groups, and citizens, whose email addresses have been provided to MDHA, and was sent to the Mayor's Office, and Members of the Metro Council. The public comment period, public hearing and reminders were publicized via MDHA's social media outlets. The public comment period opened on August 27th and ran through September 3rd 2021. A virtual public hearing was held on September 1, 2021.

Comments on the draft substantial amendment 3 to the 2019 Action Plan obtained during the public comment period are provided in Appendix B.

Reasonable Accommodation

Information on how persons with disabilities or sensory impairments or in need of translation services could request accommodation was provided in the Public Notice and posted on the Consolidated Plan webpage in Spanish, Chinese, Vietnamese, Arabic, and Somali. MDHA will make every effort to accommodate reasonable requests.

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

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Newspaper Ad (The Tennessean)	Non-targeted/broad Community	N/A	N/A	N/A	
2	Newspaper Ad (The Tribune)	Minorities	N/A	N/A	N/A	
3	Newspaper Ad (El Crucero)	Non-English Speaking (Spanish)	N/A	N/A	N/A	
4	Internet Outreach (MDHA Website)	Non-targeted/broad Community	N/A	N/A	N/A	www.nashville-mdha.org
5	Internet Outreach (Social Media)	Non-targeted/broad Community	N/A	N/A	N/A	
9	Virtual Public Hearing September 1, 2021	Non-targeted/broad community	See Appendix B	See Appendix B	See Appendix B	

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

HUD released round three (3) of the CDBG-CV CARES Act allocation on September 11, 2020. The amounts listed in the table below is based on the round three (3) CDBG-CV allocation and has not changed from substantial amendment 2. CDBG Program Income (PI) is estimated at 0 for the round three (3) CDBG-CV allocation.

Anticipated Resources

Program	Source of Funds	Use of Funds	Round 3 Allocation - \$	Program Income \$	Prior Year Resources \$	Total \$	Expected Amount \$ Available Remainder of Con Plan	Narrative Description
CDBG-CV	Public Federal	Public Services, Housing, Admin	\$5,940,972	\$0	\$0	\$5,940,972	\$0	Amount based on September 11, 2020 Round 3 CDBG-CV Allocation

Table 56 - Expected Resources – Priority Table

SP-25 Priority Needs - 91.215(a)(2) Priority

Needs Table 50 –

Priority Needs Summary

10 Priority Need Name COVID-19 Prevention Measure Opportunities

Priority Level - High

Population- Extremely Low, Low, Moderate, Large Families, Families with Children, Elderly, Chronic Homelessness Individuals, Families with Children, Mentally Ill, Chronic Substance Abuse, Veterans, Elderly, Frail Elderly, Persons with Mental Disabilities, Persons with Physical Disabilities, Persons with Developmental Disabilities, Persons with Alcohol or Other Addictions

Geographic Areas Affected Countywide

Associated Goals Disaster Mitigation/Recovery in response to COVID-19

Description In order to prevent, prepare for and respond to the Coronavirus outbreak as a condition of the CARES Act, additional priority need and goals have been added to the Consolidated Plan and 2019 Action Plan to address the concerns.

Basis for Relative Priority This is a new priority added to the Consolidated Plan as a result of the Coronavirus (COVID-19)

11 Priority Need Name COVID-19 Mitigation Preparation Opportunities

Priority Level - High

Population- Extremely Low, Low, Moderate, Large Families, Families with Children, Elderly, Chronic Homelessness Individuals, Families with Children, Mentally Ill, Chronic Substance Abuse, Veterans, Elderly, Frail Elderly, Persons with Mental Disabilities, Persons with Physical Disabilities, Persons with Developmental Disabilities, Persons with Alcohol or Other Addictions

Geographic Areas Affected Countywide

Associated Goals Disaster Mitigation/Recovery in response to COVID-19

Description In order to prevent, prepare for and respond to the Coronavirus outbreak as a condition of the CARES Act, additional priority need and goals have been added to the Consolidated Plan and 2019 Action Plan to address the concerns.

Basis for Relative Priority This is a new priority added to the Consolidated Plan as a result of the Coronavirus (COVID-19)

12 Priority Need Name COVID-19 Mitigation Response Opportunities

Priority Level - High

Population- Extremely Low, Low, Moderate, Large Families, Families with Children, Elderly, Chronic Homelessness Individuals, Families with Children, Mentally Ill, Chronic Substance Abuse, Veterans, Elderly, Frail Elderly, Persons with Mental Disabilities, Persons with Physical Disabilities, Persons with Developmental Disabilities, Persons with Alcohol or Other Addictions

Geographic Areas Affected Countywide

Associated Goals Disaster Mitigation/Recovery in response to COVID-19

Description In order to prevent, prepare for and respond to the Coronavirus outbreak as a condition of the CARES Act, additional priority need and goals have been added to the Consolidated Plan and 2019 Action Plan to address the concerns.

Basis for Relative Priority This is a new priority added to the Consolidated Plan as a result of the Coronavirus (COVID-19)

13 Priority Need Name COVID-19 Specific Administration and Planning

Priority Level - High

Population- Extremely Low, Low, Moderate, Large Families, Families with Children, Elderly, Chronic Homelessness Individuals, Families with Children, Mentally Ill, Chronic Substance Abuse, Veterans, Elderly, Frail Elderly, Persons with Mental Disabilities, Persons with Physical Disabilities, Persons with Developmental Disabilities, Persons with Alcohol or Other Addictions

Geographic Areas Affected Countywide

Associated Goals Disaster Mitigation/Recovery in response to COVID-19

Description In order to prevent, prepare for and respond to the Coronavirus outbreak as a condition of the CARES Act, additional priority need and goals have been added to the Consolidated Plan and 2019 Action Plan to address the concerns.

Basis for Relative Priority This is a new priority added to the Consolidated Plan as a result of the Coronavirus (COVID-19)

SP-45 Goals Summary – 91.215(a)(4)

Goal 7 listed in the following table has been added as an additional five year goal of the 2018-2023 Consolidated Plan

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
7	Disaster Mitigation Recovery/ Response to COVID-19	2020	2021	Public Services	Countywide	COVID-19 Mitigation Response Opportunities	\$ 917,920	Homeless Persons – Shelter Operations – 1487 persons
7	Disaster Mitigation Recovery/ Response to COVID-19	2021	2023	Public Services	Countywide	COVID-19 Mitigation Response Opportunities	\$ 1,294,739	Support Services for formerly homeless individuals maintain housing stability – 600 households – 51% LMI
7	Disaster Mitigation Recovery/ Response to COVID-19	2021	2026	Housing	Countywide	COVID-19 Prevention Response Opportunities	\$ 3,134,216	Permanent Supportive Housing for Homeless Persons – 10 units
7	Disaster Mitigation Recovery/ Response to COVID-19	2021	2026	Administration & Planning	Countywide	COVID-19 Specific Administration and Planning	\$594,097- from CDBG-CV round 3	N/A – 10% of round 3 CDBG-CV allocation for program oversight, monitoring activities thru June 2026

Table 57 – Goals Summary

AP-35 Projects – 91.220(d) Introduction

Projects

The following are projects to be undertaken with Round 3 CDBG-CV CARES Act utilizing 2020 allocations. Project # 33 is being added via substantial amendment 3.

#	Project Name
27	CDBG-CV - Administration & Planning
31	CDBG-CV – Public Services – Homeless Shelter Operations
32	CDBG-CV – Acquisition/Rehab/Ancillary Activities to provide Permanent Supportive Housing for the Homeless
33	CDBG-CV – Support Services for Formerly Homeless

Table 58 - Project Information

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

Funding priorities for CDBG-CV Round 3 CARES Act funds were established based on community need and gaps in services.

Not only are funding priorities intended to address underserved needs, they are designed for implementation to be feasible and effective.

AP-38 Project Summary

Project Summary Information

27	PROJECT NAME	CDBG-CV ADMIN AND PLANNING
	TARGET AREA	COUNTYWIDE
	GOALS SUPPORTED	Disaster Mitigation and Recovery in Response to COVID-19
	NEEDS ADDRESSED	COVID-19 Specific Administration and Planning
	FUNDING	CDBG-CV: \$906,684 (Amount includes 10% of the CDBG-CV round 3 allocation and 10% of CDBG-CV round 1 allocation for administration and planning).
	DESCRIPTION	Funding to be used for oversight and administration of CDBG-CV programs thru June 2026. Activities including monitoring, reporting, program evaluation, fair housing activities, and the development of the Consolidated Plan and annual updates and amendments thru June 2026. Planning includes studies, analysis, data gathering, and preparation of plans to help prevent, prepare for and respond to the coronavirus pandemic (COVID-19).
	TARGET DATE	6-30-2026
	ESTIMATE OF THE NUMBER AND TYPE OF FAMILIES THAT WILL BENEFIT FROM THE PROPOSED ACTIVITIES	N/A

27	LOCATION DESCRIPTION	Countywide
	PLANNED ACTIVITIES	Funds to be used by MDHA as the lead agency for staff time spent on the development and administration of the Consolidated Plan programs specific to CDBG-CV funds. Administrative activities include grant management, monitoring, budgeting, and planning and executing CDBG-CV eligible activities thru June 2026. MDHA may choose to partner with another entity to undertake eligible planning activities.

31	PROJECT NAME	CDBG-CV PUBLIC SERVICES – HOMELESS SHELTER OPERATIONS
	TARGET AREA	COUNTYWIDE
	GOALS SUPPORTED	Disaster Mitigation and Recovery in Response to COVID-19
	NEEDS ADDRESSED	COVID-19 Mitigation Response Opportunities
	FUNDING	\$917,920
	DESCRIPTION	Funds will be used to reimburse Metro Nashville for allowable cost associated with opening and operating extra shelter space in Metro Nashville to prevent and respond to the COVID-19 Pandemic. The purpose of opening and operating these shelters was to allow social distancing in the local homeless shelter system and to offer safe isolation quarters for people experiencing homelessness who tested positive for COVID and not sick enough to be hospitalized or awaiting test results, but did not have an option to self-isolate safely.

31	TARGET DATE	Complete
	ESTIMATE OF THE NUMBER AND TYPE OF FAMILIES THAT WILL BENEFIT FROM THE PROPOSED ACTIVITIES	1487 – Limited Clientele - Homeless
	LOCATION DESCRIPTION	Countywide
	PLANNED ACTIVITIES	Metro Nashville opened a social distancing shelter at the Metro Nashville Fairgrounds on March 26, 2020 for the homeless; opened and operated a separate isolation/quarantine shelter at the Fairgrounds in early April 2020 for the homeless, and opened a second social distancing shelter for homeless women at the Municipal Auditorium on June 22, 2020.

32	PROJECT NAME	CDBG-CV – Acquisition/Rehabilitation/Ancillary Activities to provide Permanent Supportive Housing for the Homeless
	TARGET AREA	COUNTYWIDE
	GOALS SUPPORTED	Disaster Mitigation and Recovery in Response to COVID-19
	NEEDS ADDRESSED	COVID-19 Prevention Response Opportunities

32	FUNDING	CDBG-CV - \$3,134,216
	DESCRIPTION	Acquisition/Rehabilitation and Ancillary activities necessary to increase the supply of permanent supportive housing for Metro Nashville's homeless population
	TARGET DATE	5/31/2026
	ESTIMATE OF THE NUMBER AND TYPE OF FAMILIES THAT WILL BENEFIT FROM THE PROPOSED ACTIVITIES	10 units - Limited Clientele - Homeless
	LOCATION DESCRIPTION	Countywide
	PLANNED ACTIVITIES	Provide grants and/or loans to assist nonprofit and for profit entities to acquire and/or rehabilitate properties to be used to be used to provide permanent supportive housing for the homeless population, with a preference to house the "chronically" homeless. Funds can also be used for ancillary activities, as applicable, such as relocation and project delivery costs. The percentage of units occupied by LMI will be in accordance with the CDBG regulations at 24 CFR, part 570.208(a)(B)(3)(i)(B) and (C).for housing activities. Funds will be awarded through a competitive RFA process or open application process.

33	FUNDING	CDBG-CV - \$1,294,739.00
	DESCRIPTION	Support services for the formerly homeless to enable them to maintain housing to prevent/mitigate the spread of the Coronavirus

	TARGET DATE	5/31/2023
	ESTIMATE OF THE NUMBER AND TYPE OF FAMILIES THAT WILL BENEFIT FROM THE PROPOSED ACTIVITIES	600 Households, 51% LMI
	LOCATION DESCRIPTION	Countywide
	PLANNED ACTIVITIES	<p>Provide grants to qualified entities to pay for costs associated with providing formerly homeless tenants residing in RRH or PSH with voluntary access to the following services with the goal of building independent living and tenancy skills to increase self-sufficiency to help them remain housed to prevent/mitigate the spread of the Coronavirus:</p> <ul style="list-style-type: none"> • Case management; • Medical, mental health; • Substance use treatment; • Employment and life skills counseling; • Eviction prevention program; • Social and recreational events; and • Tenant advocacy <p>Funds will be awarded through a competitive RFA process or open application process.</p>

AP-50 Geographic Distribution – 91.220(f)

All CARES Act activities will provided throughout Metro Nashville-Davidson County

Appendix A

Public Notice

PUBLIC NOTICE

REQUEST FOR PUBLIC COMMENT AND NOTICE OF VIRTUAL PUBLIC HEARING

In accordance with 24 CFR 91.05(c)(2) and subpart B of the federal regulations relative to citizen participation for Community Planning and Development Programs and applicable waivers made available to those requirements through the Coronavirus Aid, Relief, and Economic Security Act (CARES Act), the Metropolitan Development and Housing Agency (MDHA) is proposing substantial amendment 3 to the 2019 Action Plan (AP) of the 2018-2023 Consolidated Plan for the Metropolitan Government of Nashville and Davidson County to add a new public service activity allowing Community Development Block Grant Coronavirus (CDBG-CV) funds to be used to pay for support services for the individuals and families experiencing homelessness and describes the method to distribute these funds. The public is hereby notified that this proposed amendment is available for review through this notice.

Virtual Public Hearing: MDHA will host a virtual public hearing on this proposed amendment at:

10 a.m. CST Wednesday, Sept. 1, 2021, via WebEx

The link to the WebEx is listed below:

<https://bit.ly/Sept1WebEx>

Public Comment Period: The draft proposed substantial amendment 3 to the 2019 Action Plan of the 2018-2023 Consolidated Plan for the Metropolitan Government of Nashville and Davidson County to add a new public service activity allowing CDBG-CV funds to be used to pay for support services for the homeless population was made available for public examination and comment on Aug. 27, 2021.

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

MDHA will receive written comments through 4 p.m. CST, Friday, Sept. 3, 2021.

- Comments may be submitted electronically at consolidatedplan@nashville-mdha.org;
- Faxed to 615-252-8533 (Attention: Consolidated Plan);
- Mailed to MDHA Community Development Department, Attention: Consolidated Plan, P.O. Box 846, Nashville, TN 37202. Mailed comments must be postmarked no later than September 3, 2021;
- Hand delivered to MDHA Community Development Department (and follow instructions on door for acceptance of delivery), Attention: Consolidated Plan, 712 S. Sixth St., Nashville, TN 37206.

Purpose and Anticipated Resources: This is proposed substantial amendment 3 to the 2019 Action Plan adds a new public service activity allowing CDBG-CV funds to be used to pay for support services for individuals and families experiencing homelessness and makes adjustments to previously approved activity budget categories to fund the proposed new activity as follows:

Activities	Initial Budget Allocation	Adjustment	Adjusted Total Allocation
Shelter Operations	\$ 700,000.00	\$ 217,920.00	\$ 917,920.00
Acquisition/Rehabilitation for Permanent Supportive Housing for Persons Experiencing Homelessness	\$ 4,646,875.00	\$ (1,512,659.00)	\$ 3,134,216.00
Support Services for the Formerly Homeless Population	\$ -0-	\$ 1,294,739.00	\$ 1,294,739.00
Total All Activities	\$ 5,346,875.00	\$ 1,512,659.00	\$ 5,346,875.00

- \$917,920 - to reimburse the Metropolitan Government of Nashville and Davidson County for allowable cost associated with opening and operating social distancing shelters at the Metro Nashville Fairgrounds and the Municipal Auditorium to allow social distancing in the local homeless shelter system and to offer safe isolation quarters for persons experiencing homelessness who had either tested positive for COVID-19 but their symptoms weren't severe enough to be hospitalized or they awaiting test results but did not have an option to self-isolate safely.
- \$3,134,216 – to make grants and/or loans to assist nonprofit and for-profit entities to acquire and/or rehabilitate properties to be used as permanent supportive housing for persons experiencing homelessness – An RFA issued for this activity in February 2021 only resulted in one fundable project, freeing up funds to be used for other eligible activities.
- \$1,294,739 – to make grants to entities to pay for costs associated with providing formerly homeless tenants residing in Rapid Rehousing (RRH) or Permanent Supportive Housing (PSH) with voluntary access to case management; Medical, mental health; substance use treatment; employment and life skills counseling; eviction prevention program; social and recreational events; and tenant advocacy with the goal of building independent living and tenancy skills to increase self-sufficiency to help them remain housed to prevent the spread of the Coronavirus:

Substantial amendment 3 to the 2019-2020 is being made available for public comment in accordance with the amended citizen's participation plan approved via substantial amendment 3 to the 2018-2023 Consolidated Plan that provides for a five-day public comment period in order to access the funds as quickly as possible.

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

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

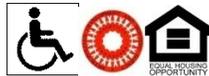
如果需要本通知的中文翻译，请打电话 615-252-8505

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

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

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

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



Appendix B

Public Hearing Comments and Responses

Substantial Amendment 3 of 2019 Action Plan Public Hearing

Name	Attendee Email	Affiliation
Lynn Lassiter	lassiter@nashville-mdha.org	MDHA
Brian Sexton	bsexton@nashville-mdha.org	MDHA
Treva Gilligan	tgilligan@nashville-mdha.org	MDHA
Jesse Call	jesse.call@uss.salvationarmy.org	The Salvation Army
Emel Alexander	ealexander@nashville-mdha.org	MDHA
Shelley Fugitt	sfugitt@nashville-mdha.org	MDHA
Angela Harrell	aharrell@nashville-mdha.org	MDHA

Join Time	Leave Time	Duration	Connection Type
2021-09-01 10:25:53	2021-09-01 11:06:48	41 mins	Desktop app
2021-09-01 10:29:18	2021-09-01 11:06:48	38 mins	Desktop app
2021-09-01 10:52:14	2021-09-01 11:06:28	15 mins	Desktop app
2021-09-01 10:53:04	2021-09-01 11:06:16	14 mins	Desktop app
2021-09-01 11:01:40	2021-09-01 11:06:33	5 mins	Desktop app
2021-09-01 11:02:34	2021-09-01 11:06:26	4 mins	Desktop app
2021-09-01 11:03:50	2021-09-01 11:06:32	3 mins	Desktop app

Email response for Emel Alexander on 9-2-2021

Joshua,

Thank you for the feedback. We will review internally and take your input into consideration when developing upcoming Action Plans.

Emel J Alexander, Director of Community Development
Metropolitan Development and Housing Agency (MDHA)
(615) 252-8507 | ealexander@nashville-mdha.org

From: Joshua Haston [mailto:jhaston@ldgdevelopment.com]

Sent: Wednesday, September 1, 2021 2:33 PM

To: Consolidated Plan; Emel Alexander; Treva Gilligan

Cc: Matt Wiltshire; Matt Loftis

Subject: MDHA Consolidate Plan - Public Comment

Mr. Alexander and Ms. Gilligan:

Good afternoon. I hope this email finds you well.

I would like to kindly suggest MDHA make a couple changes to further amend Substantial Amendment 3. See my comments below. In light of the Nashville Housing Task Force's findings that Nashville needs 45,000 new affordable units by 2030, I'm sure MDHA's dedicated staff are already thinking about ways to programmatically address this extreme need. I think the two changes below will certainly help. I would be happy to talk about these and other ideas MDHA could implement to help meet the city's housing need. Please let me know if you have additional questions about my suggestions below. Thank you for your time and consideration.

1. Please allow both non-profit and for-profit entities to be eligible to apply for every RFA for funding that MDHA releases. Some of MDHA's funding sources are currently only available to non-profit entities. If the city is going to meet its 45,000 unit need, MDHA needs to allow every entity a fair shot to help the city meet the goal. The concern should not be "who" is providing the housing and/or services that are needed, but that the needs of the people are actually being sufficiently met.

2. If MDHA's Priority 1 is to "increase the number of decent, safe affordable units..." as stated in the consolidated plan, then MDHA should reconfigure its scoring criteria for every RFA for CDBG, HOME, ESG, and HOPWA going forward to include a leverage function as a major part of the applications' scoring criteria.

With MDHA's limited federal funds, does it not make sense to prioritize funding an applicant that can maximize leverage to build the most HOME or CDBG units for the amount of money being requested? For example, in a recent RFA for HOME funds, Section 3.1 of the RFA denoted the Per Unit Subsidy Limits. However, it was unclear if the RFA's scoring criteria reflected that an application would score

better if the applicant maximized leveraging the HOME funds to produce the most HOME units as possible. Ergo, without this leverage criteria, there was “economic waste” and fewer units were created as a result. Simply adding a criterion to your scoring matrix to highly value the number of HOME/CDBG units a development is able to produce should help address this issue, allowing MDHA to create way more units and stretch your limited funding further. See the proposed example calculation below of what this could look like should MDHA choose to incorporate this into future RFAs.

For example, MDHA could award 5 points per every HOME/CDBG unit created where the difference between applicant’s proposed subsidy per HOME/CDBG unit produced and the Maximum Subsidy per unit is more than \$100,000? See the tables below showing scenarios how three different applicants could be scored under this proposed criteria. In Table 1, the applicant requested \$500,000 in HOME funds to build 15 HOME units, equating to a subsidy of \$33,333/unit, which is significantly less than the individual per unit maximum. Because the difference in the subsidy per unit and the maximum subsidy per unit is greater than \$100,000, the applicant could be awarded 5 points per each HOME unit, or 75 points (5 * 15 = 75). Compare that to the applicant in Table 2 that also requested \$500,000, However, because they’re only proposing to build 6 HOME units, they’re only eligible for 30 points (5 * 6 = 30). In Table 3, the applicant is requesting \$1,000,000 but still only providing 6 HOME units. In this scenario, the applicant is only awarded 20 points, because the difference in the subsidy per unit and maximum subsidy per unit for the 2-Br units is less \$100,000. I have also attached an Excel spreadsheet with the formulas already programmed that can help you compare and score other scenarios.

Table 1.

HOME Funds Requested \$ 500,000
 Leverage Points Awarded Per Every \$100,000 Difference in Maximum Subsidy Per Unit 5

Bedroom Type	HOME Units Provided	Subsidy Per Unit	Maximum Subsidy Per Unit	Difference	Points
0		\$ -	\$ 161,618	\$ -	0
1		\$ -	\$ 185,292	\$ -	0
2	5	\$ 33,333	\$ 225,293	\$ 191,960	25
3	5	\$ 33,333	\$ 291,458	\$ 258,125	25
4	5	\$ 33,333	\$ 319,928	\$ 286,595	25
	15				75

Table 2.

HOME Funds Requested \$ 500,000
 Leverage Points Awarded Per Every \$100,000 Difference in Maximum Subsidy Per Unit 5

Bedroom Type	HOME Units Provided	Subsidy Per Unit	Maximum Subsidy Per Unit	Difference	Points
0		\$ -	\$ 161,618	\$ -	0
1		\$ -	\$ 185,292	\$ -	0
2	2	\$ 83,333	\$ 225,293	\$ 141,960	10
3	2	\$ 83,333	\$ 291,458	\$ 208,125	10
4	2	\$ 83,333	\$ 319,928	\$ 236,595	10
	6				30

Table 3.

HOME Funds Requested \$ 1,000,000

Leverage Points Awarded Per Every \$100,000 Difference in Maximum Subsidy Per Unit 5

Bedroom Type	HOME Units Provided	Subsidy Per Unit	Maximum Subsidy Per Unit	Difference	Points
0		\$ -	\$ 161,618	\$ -	0
1		\$ -	\$ 185,292	\$ -	0
2	2	\$ 166,667	\$ 225,293	\$ 58,626	0
3	2	\$ 166,667	\$ 291,458	\$ 124,791	10
4	2	\$ 166,667	\$ 319,928	\$ 153,261	10
	6				20

Sincerely,
Joshua Haston
Development Manager
LDG Development, LLC
414 Union Street, Suite 1900
Nashville, TN 37219

Mobile: (931) 510-5460