

CONSOLIDATED PLAN
PROGRAM YEAR 2021
ANNUAL ACTION PLAN
JULY 1, 2021 THROUGH JUNE 30, 2022
For Housing and Community Development

Prepared by:
Shelby County Department of Housing
1075 Mullins Station Road
Memphis, TN 38134
(901) 222-7600

Lee Harris, Mayor
Scott Walkup, Department of Housing



Contents

Executive Summary.....	3
AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)	3
PR-05 Lead & Responsible Agencies – 91.200(b).....	10
AP-10 Consultation – 91.100, 91.200(b), 91.215(l).....	12
AP-12 Participation – 91.105, 91.200(c)	17
Expected Resources	25
AP-15 Expected Resources – 91.220(c)(1,2)	25
Annual Goals and Objectives	28
Projects	30
AP-35 Projects – 91.220(d)	30
AP-38 Project Summary	31
AP-50 Geographic Distribution – 91.220(f).....	36
Affordable Housing	37
AP-55 Affordable Housing – 91.220(g)	37
AP-60 Public Housing – 91.220(h).....	38
AP-65 Homeless and Other Special Needs Activities – 91.220(i).....	39
AP-75 Barriers to affordable housing – 91.220(j)	43
AP-85 Other Actions – 91.220(k)	45
Program Specific Requirements.....	48

Executive Summary

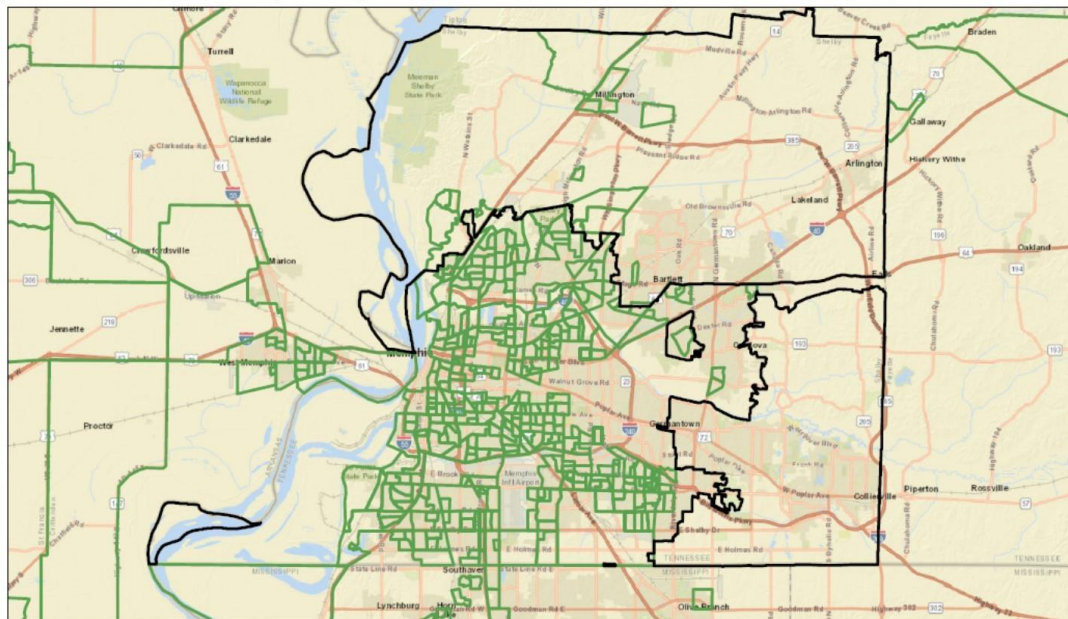
AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

1. Introduction

This Annual Plan outlines the use of Program Year 2021 federal funds granted to Shelby County by the U.S. Department of Housing and Urban Development (HUD) under the Community Development Block Grant (CDBG) and Home Investment Partnership (HOME) programs. The Plan covers the period from July 1, 2021 through June 30, 2022 and marks the third year of the Consolidated Plan 5-Year Strategy. Activities associated with the use of these funds are designated for the Shelby County Urban Entitlement Area including the municipalities of Arlington, Bartlett, Collierville, Germantown, Lakeland, and Millington as well as unincorporated areas of Shelby County. Programs and activities described in this plan are intended to primarily benefit low- and moderate-income residents of the Shelby County Urban Entitlement Area including areas with concentrations of low- and moderate-income residents. Shelby County will also use this plan as a basis for coordination with other federal, state, and local programs and initiatives. Shelby County Department of Housing (SCDH) proposes converting all CDBG program income received during each program year into unallocated funds.

The Shelby County Urban Entitlement Area is a diverse community composed of a mixture of suburban and rural development. The map below depicts the Shelby County Urban County Entitlement Area (outlined in bold black lines) as well as low- and moderate income census tracts in Shelby County.

Shelby County: Low-and Moderate-Income Census Tracts



March 26, 2019

Low Mod Blockgroup

1:391,873
0 3.25 6.5 13 mi
0 5 10 20 km
Sources: Esri, HERE, Garmin, UGG, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, © OpenStreetMap contributors, and the GIS User Community

2. Summarize the objectives and outcomes identified in the Plan

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

High priority needs identified in the 5 Year Strategy planning process to be addressed through this plan are listed below:

1. Housing Rehabilitation & Minor Home Repair
2. Parks & Recreational Facilities
3. Public Services

4. Public Facilities Improvements
5. Affordable Housing

The 5 Year Strategy established four goals to guide the use of CDBG and HOME funds from July 1, 2019 through June 30, 2024 in order to address high priority needs identified in the 5 year Strategy. These four goals are listed below and are detailed in the table below:

1. Preserve Housing Affordability
2. Improve and Construct Public Facilities
3. Provide Public Services
4. Create Opportunities for Affordable Housing Choice

Goals Summary

Goal	Category	Geographic Area	Needs Addressed	Funding
Preserve Housing Affordability	Affordable Housing Non Homeless Special Needs	Shelby County Urban Entitlement Area	Housing Rehabilitation and Minor Home Repair Affordable Housing	CDBG: \$204,210 HOME: \$322,560
	Start Year: 2019	End Year: 2023	Outcome: Availability/Accessibility	Objective: Provide decent affordable housing
	Description: Preserve existing housing to maintain supply of existing affordable housing. Outcomes include availability/accessibility as well as affordability.			
	Goal/Outcome Indicator: Homeowner/ Housing Rehabilitated	Quantity: 17	Unit of Measurement: Household Housing Unit	
Improve and Construct Public Facilities	Non-Housing Community Development	Shelby County Urban Entitlement Area	Parks and Recreational Facilities Public Facilities Improvements	CDBG: \$550,000
	Start Year: 2019	End Year: 2023	Outcome: Sustainability	Objective: Create sustainable living environments
	Description:			

	Assist local municipalities and Shelby County Government in providing safe, aesthetically pleasing, sustainable and functional communities for their residents.			
	Goal/Outcome Indicator: Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Quantity: 1000	Unit of Measurement: Households Assisted	
Provide Public Services	Non-Homeless Special Needs	Shelby County Urban County Entitlement Area	Public Services	CDBG: \$75,000 HOME: \$0
	Start Year: 2019	End Year: 2023	Outcome: Availability/Accessibility	Objective: Create suitable living environments
	Description: Provide needed social services to residents of the Urban County.			
	Goal/Outcome Indicator: Public service activities for eligible beneficiaries	Quantity: 100	Unit of Measurement: Persons benefitted	
Create Opportunities for Affordable Housing Choice	Affordable Housing Homeless Other	Shelby County Urban County Entitlement Area	Affordable Housing	CDBG: \$0 HOME: \$64,513
	Start Year: 2019	End Year: 2023	Outcome: Availability/Accessibility	Objective: Provide decent affordable housing
	Description: Create opportunities for affordable housing choice with the use of HOME CHDO setaside. Outcomes include availability/accessibility as well as affordability.			

	Goal Outcome Indicator: Homeowner Housing Added	Quantity: 1	Unit of Measurement: Household Housing Unit	
--	--	----------------	--	--

3. Evaluation of past performance

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

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

SCDH has been a CDBG Urban Entitlement grantee since 1992 and a HOME participating jurisdiction since 1994. Since that time, SCDH has sought to expand its partnership base in order to utilize existing resources more efficiently and create greater impact for each HUD dollar spent in Shelby County. Since becoming a grantee, SCDH has inspected over 1,500 housing units, fully rehabilitated more than 1,000 homes, made more than 1,000 units lead safe, and completed more than 100 public facility and infrastructure projects. This record of successful accomplishment has been integral to regularly exceeding program goals and benchmarks and has established the capacity to implement the strategies necessary to address the high priority housing and community development needs described in this Annual Plan.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

SCDH held a public hearing via GoToMeeting to solicit input on community development needs on February 15, 2021 to inform preparation of this proposed plan. The hearing was advertised in the *Memphis Flyer*, *the Daily News*, *the Millington Star*, *The Bartlett Express*, *The Germantown News*, *The Collierville Herald*, *La Prensa* (in Spanish), and *The Silver Star News*. Details regarding the hearing were also advertised on the SCDH website. Those with special needs were encouraged to contact SCDH in advance of the hearing so that arrangements for accommodations could be made. No one attended the hearing and no comments were received. SCDH also discussed with the Urban County Consortium Board members (virtually and via phone to comply with social distancing guidelines and avoid in person gatherings) to review the planning process and discuss housing needs, non-housing community development needs, and public service needs to inform preparation of the proposed Annual Plan.

The proposed Annual Plan for July 1, 2021 through June 30, 2022 will be available for public review from April 1, 2021 through April 30, 2021 online on the Division of Planning and Development's Shelby County Department of Housing webpage at <https://www.develop901.com/housing/planningReporting>.

In order to solicit public comments on the Proposed Annual Action Plan SCDH will plan to hold two virtual hearings on Tuesday, April 20, 2021 at 11:00am and Thursday, April 22, 2021 at 5:30pm. Those that plan to attend the public hearings and have special needs will be asked to please contact the Department of Housing so that accommodations can be made.

The hearings and 30-day review period (April 1-30, 2021) will be advertised in the *Memphis Flyer*, *the Daily News*, *the Millington Star*, *The Bartlett Express*, *The Germantown News*, *The Collierville Herald*, *La Prensa* (in Spanish), and the *Silver Star News*. Details regarding the hearing will also be advertised on the SCDH website.

Comments were received and activities adjusted in the current and next planning year projects.

5. Summary of public comments

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

During the public comment period, we received comments and input from two of our jurisdictions regarding current and next planning year activities, including Millington and Collierville. Through stakeholder engagement we determined a need to alter planned projects, and as such SCDH proposes amending the PY 2020 Annual Action Plan and incorporating the requested changes into the current PY2021 plan under development. This change will include the cancellation of one activity within our goal to *Improve and Construct Public Facilities* and expand another activity that addresses the same goal. Specifically, this amendment shifts project funding amounts within its Community Development and Infrastructure activity, influencing both current and next planning years. Our proposed substantial amendment will expand the Collierville Allison Heights Sidewalks project, improving walkability, access, and pedestrian safety. This increase in scope is accommodated by the cancellation of Millington's South Gym Air Conditioning project in PY20.

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

None of the comments received were not accepted.

7. Summary

Based on allocations published 2/25/2021, Shelby County anticipates receiving \$1,173,763 in CDBG funds and \$430,082 in HOME funds to address high priority needs during the 5-Year Strategy period. By addressing these needs, SCDH will advance the goals to preserve housing affordability, improve and construct public facilities, provide public services, and create opportunities for affordable housing of choice in Shelby County.

During the third year of the 5-Year Strategy period, as described in the One Year Annual Action Plan for the period of July 1, 2021 through June 30, 2022, SCDH will utilize these CDBG and HOME resources to accomplish the following:

1. Preserve Housing Affordability: complete rehabilitation on 17 owner-occupied homes
2. Improve and Construct Public Facilities: complete two (2) infrastructure projects to address community development needs
3. Provide Public Services: provide recreational activities to benefit Senior Citizens, including an additional 100 persons and provide Fair Housing Counseling to an additional 20 persons.
4. Create Opportunities for Affordable Housing Choice: Acquisition of at least one unit to create an affordable housing opportunity with CHDO set-aside funds.

PR-05 Lead & Responsible Agencies – 91.200(b)

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

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

Agency Role	Name	Department/Agency
Lead Agency	SHELBY COUNTY	
CDBG Administrator	SHELBY COUNTY	Department of Housing
HOPWA Administrator		
HOME Administrator	SHELBY COUNTY	Department of Housing
HOPWA-C Administrator		

Table 1 – Responsible Agencies

Narrative (optional)

SCDH served as the lead agency responsible for preparing this Annual Plan and is also the major public agency responsible for administering all CDBG and HOME assisted programs covered by this Annual Plan. SCDH will be advised by the Urban County Consortium and will be under the direct authority of the Mayor of Shelby County, who will have final approval for all expenditures. The Urban County Consortium is composed of the Mayor of Shelby County and the Mayors of the six Entitlement Area municipalities (Arlington, Bartlett, Collierville, Germantown, Lakeland, and Millington), or their respective designee.

Consolidated Plan Public Contact Information

Scott Walkup, Administrator
 Shelby County Department of Housing
 1075 Mullins Station Road
 Memphis, Tennessee 38134

Telephone: (901) 222-7610

Email: scott.walkup@shelbycountyttn.gov

Dana Sjostrom, Planning & Programs Manager

Shelby County Department of Housing

1075 Mullins Station Road

Memphis, Tennessee 38134

Telephone: (901) 222-7601

Email: dana.sjostrom@shelbycountyttn.gov

AP-10 Consultation – 91.100, 91.200(b), 91.215(I)

1. Introduction

SCDH has taken steps to enhance coordination with public and assisted housing providers, providers of services for the non-homeless having special needs, the Continuum of Care, and Urban County Consortium members.

Provide a concise summary of the jurisdiction’s activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(I))

SCDH coordinated with all municipalities in the Urban County Consortium (Arlington, Bartlett, Collierville, Germantown, Lakeland, and Millington) in preparing the 5 Year Strategy that guides this Annual Plan. SCDH relied upon information and input from a wide range of housing providers and health/mental health agencies, especially for drafting the needs assessment, including The Community Alliance for the Homeless, The City of Memphis Division of Housing and Community Development and the Plough Foundation.

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

Information provided by the Community Alliance for the Homeless was used for the homeless special needs section of the Needs Assessment, and the Alliance was asked to review and comment on the initial draft of this section in the Needs Assessment.

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

Shelby County is not a recipient of ESG funds and therefore did not consult with the Continuum(s) of Care to determine how to allocate ESG funds, determine performance standards and evaluate outcomes, and develop funding, policies and procedures for the administration of HMIS.

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

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	ARLINGTON
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Housing, Public Service, and Community Development Needs and the Proposed Annual Action Plan
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	As a member of the Urban County Consortium, this municipality was engaged in all aspects of the planning process, particularly by identifying and prioritizing non-housing community development and public service needs. Urban County Consortium Board meeting were held April 23, 2020 and January 15, 2021. The April meeting also served to discuss needs and opportunities to prepare for and respond to the pandemic, including CDBG-CV funding. A representative from this municipality will be provided a copy of the proposed annual plan.
2	Agency/Group/Organization	BARTLETT
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Housing, Public Service, and Community Development Needs and the Proposed Annual Action Plan
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	As a member of the Urban County Consortium, this municipality was engaged in all aspects of the planning process, particularly by identifying and prioritizing non-housing community development and public service needs. Urban County Consortium Board meeting were held April 23, 2020 and January 15, 2021. The April meeting also served to discuss needs and opportunities to prepare for and respond to the pandemic, including CDBG-CV funding. A representative from this municipality will be provided a copy of the proposed annual plan.
3	Agency/Group/Organization	COLLIERVILLE
	Agency/Group/Organization Type	Other government - Local

	What section of the Plan was addressed by Consultation?	Housing, Public Service, and Community Development Needs and the Proposed Annual Action Plan
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	As a member of the Urban County Consortium, this municipality was engaged in all aspects of the planning process, particularly by identifying and prioritizing non-housing community development and public service needs. Urban County Consortium Board meetings were held April 23, 2020 and January 15, 2021. The April meeting also served to discuss needs and opportunities to prepare for and respond to the pandemic, including CDBG-CV funding. A representative from this municipality will be provided a copy of the proposed annual plan.
4	Agency/Group/Organization	Germantown
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Housing, Public Service, and Community Development Needs and the Proposed Annual Action Plan
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	As a member of the Urban County Consortium, this municipality was engaged in all aspects of the planning process, particularly by identifying and prioritizing non-housing community development and public service needs. Urban County Consortium Board meetings were held April 23, 2020 and January 15, 2021. The April meeting also served to discuss needs and opportunities to prepare for and respond to the pandemic, including CDBG-CV funding. A representative from this municipality will be provided a copy of the proposed annual plan.
5	Agency/Group/Organization	Lakeland
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Housing, Public Service, and Community Development Needs and the Proposed Annual Action Plan

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	As a member of the Urban County Consortium, this municipality was engaged in all aspects of the planning process, particularly by identifying and prioritizing non-housing community development and public service needs. Urban County Consortium Board meetings were held April 23, 2020 and January 15, 2021. The April meeting also served to discuss needs and opportunities to prepare for and respond to the pandemic, including CDBG-CV funding. A representative from this municipality will be provided a copy of the proposed annual plan.
6	Agency/Group/Organization	MILLINGTON
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Housing, Public Service, and Community Development Needs and the Proposed Annual Action Plan
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	As a member of the Urban County Consortium, this municipality was engaged in all aspects of the planning process, particularly by identifying and prioritizing non-housing community development and public service needs. Urban County Consortium Board meetings were held April 23, 2020 and January 15, 2021. The April meeting also served to discuss needs and opportunities to prepare for and respond to the pandemic, including CDBG-CV funding. A representative from this municipality will be provided a copy of the proposed annual plan.

Identify any Agency Types not consulted and provide rationale for not consulting

Effort was made to consult widely with partners and organizations that have expressed interest in Department of Housing's programs and also circulate the proposed Annual Plan widely for review and comment. No agencies were deliberately not consulted.

Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Community Alliance for the Homeless	SCDH does not receive direct funding for homelessness prevention. However, Shelby County Government supports the efforts of the Community Alliance for the Homeless. The Alliance was asked to provide input regarding homelessness needs into the proposed plan.

Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

A copy of the proposed annual plan will be sent to the listserv of LinchHub which is the Memphis Public Library listserv for community information.

AP-12 Participation – 91.105, 91.200(c)

1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting

SCDH held a public hearing to solicit input on housing, public service, and community development needs on February 15, 2021 to inform preparation of this proposed plan. The hearing was advertised in the *Memphis Flyer*, *the Daily News*, *the Millington Star*, *The Bartlett Express*, *The Germantown News*, *The Collierville Herald*, *La Prensa* (in Spanish), and *The Silver Star News*. Details regarding the hearing were also advertised on the SCDH website. Those with special needs were encouraged to contact SCDH in advance of the hearing so that arrangements for accommodations could be made. No one attended the hearing and no comments were received. SCDH also met with the Urban County Consortium on April 23, 2020 and January 15, 2021 (virtually). The April meeting also served to discuss needs and opportunities to prepare for and respond to the pandemic. to review the planning process and discuss housing, public service, and community development needs to also inform preparation of the proposed Annual Plan. During the 30-day review period of the proposed Annual Plan, SCDH will hold two public hearings to discuss the proposed plan on April 20, 2021 at 11:00am CST and April 22, 2021 at 5:30pm (virtually). The hearing was advertised in the *Memphis Flyer*, *the Daily News*, *the Millington Star*, *The Bartlett Express*, *The Germantown News*, *The Collierville Herald*, *La Prensa* (in Spanish), and *The Silver Star News* at the end of March 2021. Details regarding the hearing will also be advertised on the SCDH website. Those with special needs will be encouraged to contact SCDH in advance of the hearing so that arrangements for accommodations could be made. We received input during this 30-day comment period that led to a proposed substantial amendment to the current Planning Year 2020, which also impacts this proposed Planning Year 2021 activities. Specifically, this amendment shifts project funding amounts within our Community Development and Infrastructure activity. Our proposed substantial amendment will expand the Collierville Allison Heights Sidewalks project during the current planning year, improving walkability, access, and pedestrian safety. This increase in scope is accommodated by the cancelation of Millington’s South Gym Air Conditioning project.

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	Non-targeted/broad community	N/A	No comments received	Not Applicable - Public Notice published in the MEMPHIS FLYER on January 21, 2021 to promote a public hearing on Community Development Needs held on February 15, 2021.	
2	Newspaper Ad	Non-targeted/broad community	N/A	No comments received	Not Applicable - Public Notice published in the DAILY NEWS on January 9, 2020 to promote a public hearing on Community Development Needs held on February 15, 2021.	

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)
3	Newspaper Ad	Minorities Non-English Speaking - Specify other language: Spanish	N/A	No comments received	Not Applicable - Public Notice published in LA PRENSA LATINA on January 24, 2021 to promote a public hearing on Community Development Needs held on February 15, 2021	
4	Newspaper Ad	Minorities	N/A	No comments received	Not Applicable - Public Notice published in the TRI-STATE DEFENDER on January 9, 2020 to promote a public hearing on Community Development Needs held on February 15, 2021.	

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)
5	Public Hearing	Non-targeted/broad community	N/A	No comments were received	Not Applicable - Two public hearings were conducted, the first on April 20 at 11:00am CST and the second on April 22, 2021 at 5:30pm (virtually). The hearing was advertised in the Memphis Flyer, the Daily News, the Millington Star, The Bartlett Express, The Germantown News, The Collierville Herald, La Prensa (in Spanish), and The Silver Star News at the end of March 2021. No one attended either meeting and no comments were received.	

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)
6	Newspaper Ad	Minorities			Not Applicable - Public Notice published in the SILVER STAR NEWS on March 17, 2021 to promote two public hearings on Community Development Needs held on April 20 and 22, 2021.	
7	Newspaper Ad	Non-targeted/broad community	N/A	No comments received	Not Applicable - Public Notice published in the BARTLETT EXPRESS on March 18, 2021 to promote two public hearings on Community Development Needs held on April 20 and 22, 2021.	

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)
8	Newspaper Ad	Non-targeted/broad community	N/A	No comments received	Not Applicable - Public Notice published in the MILLINGTON STAR on March 18, 2021 to promote two public hearings on Community Development Needs held on April 20 and 22, 2021.	
9	Newspaper Ad	Non-targeted/broad community	N/A	No comments received	Not Applicable - Public Notice published in the COLLIERVILLE HERALD on March 18, 2021 to promote two public hearings on Community Development Needs held on April 20 and 22, 2021.	

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)
10	Newspaper Ad	Non-English Speaking - Specify other language: Spanish	N/A	No comments received	Not Applicable - Public notice published in LA PRENSA LATINA on March 17, 2021 to promote two public hearings on Community Development Needs held on April 20 and 22, 2021.	
11	Newspaper Ad	Non-targeted/broad community	N/A	No comments received	Not Applicable - Public notice published in THE MEMPHIS FLYER on March 18, 2021 to promote two public hearings on Community Development Needs held on April 20 and 22, 2021.	

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)
12	Newspaper Ad	Non-targeted/broad community	N/A	No comments received	Not Applicable - Public notice published in THE DAILY NEWS on March 18, 2021 to promote two public hearings on Community Development Needs held on April 20 and 22, 2021.	

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

Anticipated CDBG and HOME resources, including the PY2021 allocation and prior year resources are shown below. SCDH proposes converting all CDBG program income received during each program into unallocated funds.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	1,173,763	10,000	100,000	1,283,763	2,436,845	These anticipated resources are based upon actual allocation amounts for PY2021.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	430,082	15,000	10,000	455,082	1,161,175	These anticipated resources are based upon actual allocation amounts for PY 2021.

Table 5 - Expected Resources – Priority Table

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

Federal funds will leverage additional resources including approximately \$16,000 in private funds through nonprofit CHDO developers receiving the HOME CHDO set-aside funds and approximately \$80,000 in local funds to meet HOME matching requirements.

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

It is not anticipated that publicly owned land or property located within the jurisdiction may be used to address the needs identified in the plan.

Discussion

These anticipated resources are based upon actual allocation amounts for PY2020.

For PY2021, SCG was allocated \$23,123 less in CDBG dollars and \$12,359 more in HOME dollars in comparison to PY2020 allocations

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Preserve Housing Affordability	2019	2023	Affordable Housing Non-Homeless Special Needs	Shelby County Urban County Entitlement Area	Housing Rehabilitation & Minor Home Repair Affordable Housing	CDBG: \$204,010 HOME: \$322,560	Homeowner Housing Rehabilitated: 17 Household Housing Unit
2	Improve and Construct Public Facilities	2019	2023	Non-Housing Community Development	Shelby County Urban County Entitlement Area	Parks & Recreational Facilities Public Facilities Improvements	CDBG: \$550,000 HOME: \$0	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 1000 Households Assisted
3	Provide Public Services	2019	2023	Non-Homeless Special Needs	Shelby County Urban County Entitlement Area	Public Services	CDBG: \$75,000	Public service activities other than Low/Moderate Income Housing Benefit: 40 Persons Assisted
4	Create Opportunities for Affordable Housing Choice	2019	2023	Affordable Housing Homeless Fair Housing	Shelby County Urban County Entitlement Area	Affordable Housing	HOME: \$64,513	Homeowner Housing Added: 1 Household Housing Unit

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	Preserve Housing Affordability
	Goal Description	Preserve existing housing to maintain the supply of existing affordable housing. Outcomes include availability/accessibility as well as affordability.
2	Goal Name	Improve and Construct Public Facilities
	Goal Description	Assist local municipalities and Shelby County Government in providing safe, aesthetically pleasing, and functional communities for their residents.
3	Goal Name	Provide Public Services
	Goal Description	Provide needed social services to residents of the Urban County.
4	Goal Name	Create Opportunities for Affordable Housing Choice
	Goal Description	Create opportunities for affordable housing choice with the use of HOME CHDO set-aside. Outcomes include availability/accessibility as well as affordability.

Projects

AP-35 Projects – 91.220(d)

Introduction

Anticipated CDBG and HOME resources are shown below. SCDH proposes applying all CDBG program income received during each program year toward high priority Community Development/Infrastructure Projects and/or Public Service Activities.

Projects

#	Project Name
1	Housing Rehabilitation/Minor Home Repair
2	Community Development/Infrastructure Projects
3	Public Service Activities
4	CHDO Affordable Housing Development
5	Program Delivery
6	Administration and Planning

Table 7 - Project Information

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

Allocation priorities were based upon needs identified through the citizen participation process as well as from the guidance and input of the Urban County Consortium throughout the planning process. Obstacles to address underserved needs identified in the planning process are primarily a function of limited resources.

AP-38 Project Summary
Project Summary Information

1	Project Name	Housing Rehabilitation/Minor Home Repair
	Target Area	Shelby County Urban County Entitlement Area
	Goals Supported	Preserve Housing Affordability
	Needs Addressed	Housing Rehabilitation & Minor Home Repair Affordable Housing
	Funding	CDBG: \$350,000 HOME: \$551,850
	Description	Housing Rehabilitation or minor-home repair for low-and moderate-income owner-occupied homes including units under the Lead Hazard Control Program (Minor Home Repair).
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	17 low-and moderate-income owner-occupied households will benefit from the proposed activities.
	Location Description	To be determined based upon client intake/enrollment.
	Planned Activities	Rehabilitation of 17 owner-occupied houses to bring homes into code compliance.
2	Project Name	Community Development/Infrastructure Projects
	Target Area	Shelby County Urban County Entitlement Area
	Goals Supported	Improve and Construct Public Facilities
	Needs Addressed	Parks & Recreational Facilities Public Facilities Improvements
	Funding	CDBG: \$550,000
	Description	Infrastructure or Community Development projects in the Urban County such as water/sewer improvements, ADA improvements to public facilities including sidewalks, and park/recreational facilities
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	The number of families that will benefit is to be determined based upon precise location and service area of the project(s); approximately 200 families.
	Location Description	Millington, TN Northaven, TN (unincorporated Shelby County)

	Planned Activities	Planned activities include the following to address high priority community development needs: a) Millington Ball Field Lighting b) Northaven Park Installation
3	Project Name	Public Service Activities
	Target Area	Shelby County Urban County Entitlement Area
	Goals Supported	Provide Public Services
	Needs Addressed	Public Services
	Funding	CDBG: \$75,000
	Description	Public Services activities in the Urban County to benefit special needs and elderly populations.
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	At least 100 elderly persons will benefit from recreational services provided to senior citizens in the Urban County and another 20 individuals will benefit from Fair Housing Counseling
	Location Description	For the recreational services for the elderly: within the Urban County at Senior Centers and/or Community Centers. For the Fair Housing Counseling: Within the Urban County.
Planned Activities	For the recreational services for the elderly: fine arts classes (such as painting, music, pottery, crafts, etc.), educational classes, job training classes, or other enrichment and arts-based entertainment for Senior Citizens under an existing response to a request for proposals. For the Fair Housing Counseling: provide information on fair housing rights and on the availability of housing in a wide variety of locations, emphasizing housing choice conducted by Memphis Area Legal Services.	
4	Project Name	CHDO Affordable Housing Development
	Target Area	Shelby County Urban County Entitlement Area
	Goals Supported	Create Opportunities for Affordable Housing Choice
	Needs Addressed	Affordable Housing
	Funding	HOME: \$64,513
	Description	Create Opportunities for Affordable Housing Choice
	Target Date	6/30/2022

	Estimate the number and type of families that will benefit from the proposed activities	One low/moderate income homebuyer is expected to benefit from this activity.
	Location Description	To be determined
	Planned Activities	Acquisition and rehabilitation of a vacant housing unit to create and affordable housing unit for sale to a qualifying low/moderate income homebuyer.
5	Project Name	Program Delivery
	Target Area	Shelby County Urban County Entitlement Area
	Goals Supported	Preserve Housing Affordability Improve and Construct Public Facilities Provide Public Services Create Opportunities for Affordable Housing Choice
	Needs Addressed	Housing Rehabilitation & Minor Home Repair Parks & Recreational Facilities Public Services Public Facilities Improvements
	Funding	CDBG: \$210,000
	Description	Implementation of CDBG programs.
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	N/A
	Planned Activities	N/A
6	Project Name	Administration and Planning
	Target Area	Shelby County Urban County Entitlement Area
	Goals Supported	Preserve Housing Affordability Improve and Construct Public Facilities Provide Public Services Create Opportunities for Affordable Housing Choice

Needs Addressed	Housing Rehabilitation & Minor Home Repair Parks & Recreational Facilities Public Services Public Facilities Improvements Affordable Housing
Funding	CDBG: \$234,752 HOME: \$43,008
Description	General administrative and planning activities necessary to operate HOME and CDBG programs
Target Date	6/30/2022
Estimate the number and type of families that will benefit from the proposed activities	N/A
Location Description	N/A
Planned Activities	N/A

AP-50 Geographic Distribution – 91.220(f)

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

There are seven municipalities in Shelby County including Arlington, Bartlett, Collierville, Germantown, Memphis, Millington, and Lakeland. The Shelby County Urban Entitlement includes unincorporated Shelby County and all of these municipalities except the City of Memphis

Geographic Distribution

Target Area	Percentage of Funds
Shelby County Urban County Entitlement Area	100
Shelby County, Tennessee	

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

SCDH does not propose emphasizing target areas or strategy areas as part of this Strategic Plan. This is primarily because concentrations of low- and moderate-income areas in the jurisdiction are limited, low- and moderate-income area and households are spread throughout the jurisdiction, and assistance is allocated based upon population data from each of the six municipalities within the jurisdiction. The Shelby County Urban Entitlement Area is a diverse community including a mixture of suburban and rural development. Since concentrations of low- and moderate-income areas in the jurisdiction are limited, direct assistance is prioritized to be available to eligible beneficiaries throughout the entitlement area and jurisdiction, while area-benefit activities are directed to benefit eligible low- and moderate-income areas.

Discussion

Housing services offered in accordance with this Strategic Plan will be made available on a jurisdiction-wide basis. Non-housing community development activities will be rotated among the urban county consortium members as resources permit and in accordance with the Strategic Plan to provide benefits in low- and moderate-income areas or direct benefit to low- and-moderate income clients as applicable. Additionally, public service activities serve all of the urban county or be rotated among the urban county consortium members.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

SCDH aims to meet its goal to address affordable housing needs through rehabilitation activities and utilization of the CHDO setaside to create one new low to moderate income home ownership opportunity.

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	15
Special-Needs	3
Total	18

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

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	1
Rehab of Existing Units	17
Acquisition of Existing Units	0
Total	18

Table 10 - One Year Goals for Affordable Housing by Support Type

Discussion

Of the 18 planned households receiving support for affordable housing, 17 are expected to include housing rehabilitation including three families with special needs (particularly disabled or elderly/frail elderly). The remaining household receiving support includes the construction of one new CHDO unit.

AP-60 Public Housing – 91.220(h)

Introduction

The Millington Housing Authority requires little assistance from the SCDH. Kefauver Estates, the remaining public housing facility in the Urban County, is operated by the Memphis Housing Authority. SCDH will continue to assist both housing authorities as needed to ensure that its needs are met and the goal of providing safe, decent, and affordable housing for its residents is obtained.

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

In Program Year 2022, The Shelby County Department of Housing will continue its efforts to serve the needs of extremely low-income, low-income, and moderate-income families residing in the jurisdiction served by the Millington Housing Authority.

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

Memphis Housing Authority has a Resident Advisory Board (RAB) established to provide activities and advocate for the rights of residents. The Memphis Housing Authority RAB is also responsible for assisting with and commenting on Memphis Housing Authority's 5 -Year Planning process. The Millington Housing Authority (MillHA) also has a Resident Advisory Board that meets annually. Additionally, MillHA publishes a newsletter to engage and inform residents. To encourage and support greater numbers of residents in homeownership, SCDH plans to continue implementing a homebuyer downpayment assistance program during the program year. This program could benefit qualified public housing residents seeking to own their own home. This program is funded using state and local funds.

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

Neither PHA is designated as troubled.

Discussion

Both public housing authority operations located within the Urban County Entitlement Area are small and rely upon Resident Advisory Boards to encourage resident involvement in management. Neither is designated as troubled

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

Introduction

Shelby County is not a recipient of ESG grant funds and has not established one-year goals to utilize CDBG or HOME funds directly for homeless reduction activities. Activities to address these issues are coordinated with the City of Memphis and the Community Alliance for the Homeless.

The Memphis/Shelby County Mayor's Action Plan to End Homelessness, the guiding set of strategies for the Memphis/Shelby County Continuum of Care (CoC), focuses on the evidence-based strategies of permanent housing and rapid rehousing along with targeting the best fit interventions to the appropriate subpopulation. The plan calls for an increase in permanent housing and a decrease in transitional housing. The CoC has reallocated 100% of our CoC funded transitional housing units to permanent housing programs, either rapid rehousing or permanent supportive housing. Based on the 2016 Consolidated Application (submitted in September, 2016), we no longer have transitional housing beds funded through the CoC, down from 854 units in the 2011 application. Over the last three years, overall homelessness has dropped an average of 7% each year based on data collected from the last three annual Point in Time Counts.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including

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

The Continuum of Care (CoC) is working to reduce and end homelessness by improving system performance measures to ensure that services and resources are utilized in the most effective ways. These system performance measures include improving our community's rate of exits to permanent destinations, decreasing our rates of returns to homelessness, improving the length of stay standards for program types, and increasing income for clients. Ongoing data quality checks through our HMIS system allow us to better monitor how well programs are reaching these goals, which contribute towards the overall success of the community towards ending homelessness. A switch in the HMIS system provider for the CoC has also allowed the CoC to better assess data and create dashboards that help monitor system performance goals on a more ongoing basis. In addition to improving system performance measures, a coordinated approach to referrals and outreach is coordinated through bi-weekly By-Name List meetings. These meetings bring together outreach workers and agency providers throughout the community to discuss names of individuals on the Coordinated Entry By-Name List who are waiting for housing opportunities. Through this process, outreach workers are able to assess individuals for their needs and then give updates and coordinate with agencies for referrals when housing opportunities are available. This has brought to light the importance of street outreach and the need to enhance funding for outreach and SOAR activities. SOAR is an approach for people who were experiencing or at risk of homelessness to have quick access to SSI/SSDI benefits. We expect to pursue funding to expand and

enhance our street outreach presence in the coming years. We have also established an electronic assessment and referral tool to maximize our existing resources and make it easier for people experiencing homelessness to seek help. This process also includes a sighting tool which allows people in the community who are concerned about someone sleeping on the streets or in a place not meant for human habitation to submit a concern and outreach will then follow-up to try to engage with the person experiencing homelessness.

The community's Coordinated Entry approach includes a 24/7 phone-based hotline, two walk-in centers, a roving street outreach presence, and a "no-wrong-door approach" for individuals to access the CES through any CES provider. For families with children, we have a centralized intake that screens, on average 251 families per month and our phone-based hotline receives 642 calls/month. The central intake number is based on the average number of calls for 2019. Those who do not meet HUD's definition of literally homeless are receiving mediation and other prevention services. Through Rapid Rehousing efforts, the community is housing an all-time high number of families.

Addressing the emergency shelter and transitional housing needs of homeless persons

Memphis has identified the need for free/no fee emergency shelter especially for single women and families with children. MIFA has utilized funding for emergency shelter alternatives for families when traditional shelters are full by paying for hotel/motels. However, there is still a need for more emergency shelter options especially for larger families. The need is also present for low-barrier emergency shelters, which in addition to having no fees includes shelter without stipulation of participating in services, which includes faith-based programming.

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

The US Veterans Administration awarded two local providers, Catholic Charities of West Tennessee and Memphis Area Legal Services, funding in the amount of \$1.3 million to launch a Rapid Rehousing initiative under the Supportive Services for Veteran Families (SSVF) program. Approximately 60% of those receiving assistance under the program are homeless households with a veteran, and 40% are households that are imminently homeless. Families receiving assistance through this initiative, along with the Rapid Rehousing programs operated by other service providers, experience shorter homeless episodes than other families, and based on newly released research, have lower rates of returning to homelessness than other similar households.

MIFA serves as the point of entry for all families experiencing homelessness and coordinates emergency

shelter or hotel/motel stays for families facing literal homelessness. In addition, MIFA also has mediation services, coordinates the RRH and PSH program referrals for families, and has case managers who work to ensure families are able to learn skills necessary to sustain their own housing and live independently. Unaccompanied youth are also prioritized through this system, and coordination through youth specific programming and housing helps to ensure youth are specifically addressed for housing and resource needs. This system also works with other systems of care such as hospitals, DCS, mental health facilities, and more to work to ensure that individuals discharged or leaving those destinations are able to be linked with Coordinated Entry services and aim to prevent persons being discharged into homelessness.

Alliance Healthcare Services launched a 3-year program to provide services to homeless veterans and other chronically homeless individuals. The services are delivered using a Critical Time Intervention (CTI) model of case management. CTI is a time-limited evidence based practice (EBP) that focuses on transitioning people from the streets and shelters into permanent housing. The services are designed to help individuals successfully navigate the difficult transition from homelessness to housing. The program has been used effectively with veterans and people with substance abuse or co-occurring disabilities.

In an effort to prevent a return to homelessness for individuals who were chronically homeless, we continue to maintain a Housing First Assertive Community Treatment (ACT) team. The team provides intensive, integrated treatment for dually diagnosed chronically homeless individuals who reside in permanent housing. This team, supervised by Alliance Healthcare Services includes mental health professionals, physical health professionals, case managers, and peer support specialists. AHS serves at least 60 individuals who are housed with permanent supportive housing providers. The services we expect people leaving institutions to need are housing, community based mental health counseling and treatment, physical health care, employment services, substance abuse counseling and treatment, disability benefit application assistance, and legal advocacy/services.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.

The US Veterans Administration awarded two local providers, Catholic Charities of West Tennessee and Memphis Area Legal Services, funding in the amount of \$1.3 million to launch a Rapid Rehousing initiative under the Supportive Services for Veteran Families (SSVF) program. Approximately 60% of those receiving assistance under the program are homeless households with a veteran, and 40% are households that are imminently homeless. Families receiving assistance through this initiative, along with the Rapid Rehousing programs operated by other service providers, experience shorter homeless episodes than other families, and based on newly released research, have lower rates of return to

homelessness than other similar households. OUTMemphis and Agape both have Rapid-Re-Housing programs geared towards youth ages 18-24, and OUTMemphis is breaking ground this year on a Youth Drop-In Center and Youth Emergency Shelter. The shelter will be the only youth-specific shelter in Memphis/Shelby County and will have 4 beds where LGBTQ youth 18-24 years of age are able to stay for up to 30 days. Our community was also recently awarded Family Unification Program vouchers which can be used to help families that are involved in DCS and whose only barrier to reunification is housing. These vouchers can also be used for youth who have a history of foster care involvement, and are helping us to bridge gaps between different systems of care. Collaboration with Youth Villages, which operates the Extension of Foster Care program, has helped to make sure additional resources available to youth aging out of foster care can be provided when applicable.

Alliance Healthcare Services launched a 3-year program to provide services to homeless veterans and other chronically homeless individuals. The services are delivered using a Critical Time Intervention (CTI) model of case management. CTI is a time-limited evidence based practice (EBP) that focuses on transitioning people from the streets and shelters into permanent housing. The services are designed to help individuals successfully navigate the difficult transition from homelessness to housing. The program has been used effectively with veterans and people with substance abuse or co-occurring disabilities. This program is in its final year and is expected to serve 80 households during this final year. The agency has identified a SAMSHA grant that will allow the program to continue. If funded, the services could continue up to 5 additional years.

Discussion

Since Shelby County is not a recipient of ESG grant funds, it has insufficient resources for direct expenditures to carry out homeless reduction activities. Efforts to address these issues are coordinated with the City of Memphis and the Community Alliance for the Homeless. During the program year, SCDH will support those efforts as necessary and appropriate as well as to the greatest extent feasible.

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

Introduction:

Based on the 2019 Memphis-Shelby County Analysis of Impediments to Fair Housing (AI), the following are public policy barriers to affordable housing:

1) Segregation persists.

Contributing factors to segregation include historical settlement patterns, distribution of attainable/affordable housing (both market-rate and publicly assisted housing), land use and zoning regulations, disparities in mortgage lending, and economic factors

2) Disparities in housing needs.

Contributing factors to disparities in housing needs include lower homeownership rates among most minority groups, availability affordable units in a range of sizes, lack of private investments in specific neighborhoods, economic factors, and lending discrimination.

3) Disparities in access to opportunity.

Contributing factors to disparities in access to opportunity include availability of affordable units in a range of sizes, limited support for multifamily housing, distribution of publicly assisted housing, NIMBYism, lack of private investments in specific neighborhoods, lending discrimination, steering, land use and zoning laws, limited/lack of public transit in certain areas, and economic disparities.

4) Barriers to housing choice for people with disabilities.

Contributing factors include a lack of accessible housing across the region; lack of fair housing knowledge/compliance among landlords; limited public transportation in many neighborhoods, lack of public and private investment.

5) Location and utilization of publicly assisted housing.

Contributing factors include lack of affordable housing in a range of unit sizes, NIMBYism, land use and zoning regulations.

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

return on residential investment

The City of Memphis and Shelby County identified the following goals and strategic partnership opportunities (see Figure VIII-1 in Attachments section) to address fair housing concerns in the region. Figure VIII-1 lists those goals and partnership opportunities along with the fair housing issue to be addressed by each goal. Unless otherwise specified, both the City and the County intend to pursue the stated goal.

In year 3, SCDH will continue to implement its Rehabilitation Program (Goal 1A) and Down Payment Assistance Programs (Goal 2B). SCDH will also create affordable housing opportunities through partnership with a local non-profit by using HOME CHDO set-aside funds (Goal 1C). For the remaining goals to addresses impediments to Fair Housing, Shelby County Government will designate Memphis Area Legal Services as a sub-recipient to address impediments to fair housing.

Discussion:

Barriers to affordable housing coincide with many impediments to fair housing, as protected classes often are low-income and face disparate impacts by virtue of income as well as race or other protected class. As a result, the identified barriers to affordable housing mirror some of the impediments to fair housing identified in Shelby County's Analysis of Impediments to Fair Housing.

AP-85 Other Actions – 91.220(k)

Introduction:

Shelby County plans other actions during the program year including actions to address obstacles to meeting underserved needs, to foster and maintain affordable housing, to reduce lead-based paint hazards, to reduce the number of poverty-level families, to develop institutional structure, and to enhance coordination between public and private housing and social service agencies.

Actions planned to address obstacles to meeting underserved needs

SCDH will continue to work with and coordinate activities with the Shelby County Community Services Agency (CSA) in their efforts to meet the underserved needs in the Shelby County Urban County Entitlement Area. CSA offers various programs targeting individuals and families with low- to moderate-incomes such as rent/mortgage assistance, utility assistance, weatherization, and referrals for the homeless population.

Additionally, SCDH will provide referrals as necessary to the Aging Commission of the Mid-South. The Aging Commission provides assistance to the senior population of Shelby County through programs including Alzheimer's service, home care, legal assistance, long term care ombudsman services, nutrition services, public guardianship, and transportation.

Finally, the SCDH will be involved in the Memphis Green and Healthy Homes Initiative to provide referrals to a larger network of organizations as necessary when client needs exceed SCDH capacity and to stay informed of (new) resources and programs to serve Urban County residents.

Actions planned to foster and maintain affordable housing

The Annual Plan is driven by four goals, and two of these are directed towards fostering and maintaining affordable housing. The two goals emphasizing fostering and maintaining affordable housing are:

- Preserve Housing Affordability and
- Create Opportunities for Affordable Housing Choice

These goals will be accomplished through the rehabilitation of owner-occupied housing in the Urban County and the development of affordable housing by a CHDO using HOME CHDO set-aside funds.

Actions planned to reduce lead-based paint hazards

All pre-1978 housing rehabilitation using CDBG or HOME funds (including CHDO funds) will be evaluated

for the presence of lead-based paint hazards. Risk Assessors certified by the Tennessee Department of Environment and Conservation (TDEC) will complete paint inspections using X-ray Fluorescence (XRF devices) and collect environmental samples that will be used to complete a Risk Assessment to identify all lead-based paint hazards and provide recommendations to address the hazards. Methods to address hazards may be in the form of interim control, abatement, or a combination of the two based on considerations including budgets, energy efficiency, Lead Safe Housing Rule requirements, and other state, federal, and local requirements.

Actions planned to reduce the number of poverty-level families

SCDH plans to provide supplemental assistance in the form of housing rehabilitation, minor home repair and lead-based paint hazard controls to reduce housing costs among low- and moderate-income households, including the impoverished. Additionally, the primary aim of Shelby County Government's Community Services Agency (CSA) is breaking the generational cycle of poverty requires changes in attitude, living conditions, education, and aspirations of its victims.

Working with nonprofit organizations, other branches of government, other governmental agencies, and citizen committees, the agency plans and carries out programs for low-income residents. These programs emphasize self-help. Most recently, CSA assisted 22,041 households utility customers in a 12 month period through their Low Income Energy Assistance Program.

Actions planned to develop institutional structure

As the primary organization responsible for the administration of funds, implementation of projects and programs, and the expenditure of all grant allocations, SCDH will coordinate efforts and activities within the Urban County community. This coordination will involve the administration and delivery of all CDBG and HOME funds as well as activities funded with these funds. SCDH operates under the direct authority of the Mayor of Shelby County and will continue to be advised by the UCC. Shelby County Government will contract with the respective municipalities for all community development projects during the program year and will directly administer and/or deliver those programs/projects associated with Housing Rehabilitation and Minor Home Repair. For Public Service activities, SCDH will contract with the respective municipalities and/or a third party non-profit organization for all public service activities. This structure will enable all municipalities and Shelby County to have direct control of these funds. The Mayor of Shelby County, representing the Entitlement Area as a whole, will have final approval of all expenditures.

During the 2021 Program Year, SCDH will continue to take advantage of upcoming training opportunities for staff directly involved in the delivery and administration of funds. SCDH will also provide training to the staff of its Urban County partners as requested in order to insure that participating municipalities

are aware of their responsibilities under the entitlement programs.

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

In order to enhance coordination between public and private housing and social service agencies during the year, SCDH will continue to strengthen existing and seek out and solidify new partnerships with housing, health, and social service agencies that will enable Shelby County to make progress towards achieving the goals of the Consolidated Plan. Furthermore, the department will continue to work with local non-profits, CHDOs, and other agencies carrying out housing and community redevelopment efforts in order to enhance overall coordination of activities at the local level.

Discussion:

In addition to these other described actions planned for the program year, SCDH intends to continue addressing impediments to fair housing identified in the Shelby County Analysis of Impediments to Fair Housing and also plans to continue efforts to provide outreach and training to Section 3 contractors.

Program Specific Requirements

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

Introduction:

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(I)(1)

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

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

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	100.00%

HOME Investment Partnership Program (HOME)

Reference 24 CFR 91.220(I)(2)

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

No HOME funds will be used as forms of investment that are not described in Section 92.205. SCDH will leverage the use of HOME funds through its partnerships with CHDOs who will provide private

sources of funding.

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

When HOME funds are utilized for a homebuyer activity, contracts and restrictive covenants will ensure affordability of units acquired with HOME funds. Developers will be required to include a recapture provision in all agreements in order to ensure affordability. When new construction occurs using HOME funds, the affordability period will be determined as follows:

- 5 years when using less than \$15,000 in HOME funds,
- 10 years when using \$15,000 to \$40,000 in HOME funds, and
- 15 years when using more than \$40,000 in HOME funds.

If the property is resold or foreclosed upon during the designated period to a buyer who is not an eligible low-income purchaser, SCDH will recapture the original amount of HOME funds invested from net sales proceeds. However, if proceeds are insufficient to recapture the full HOME investment plus enable the homeowner a fair return of personal funds invested in the downpayment, principal payments, and capital improvements, SCDH may allow recaptured HOME funds to be reduced on a pro rata basis as provided in the HOME Final Rule, or subsequent HUD regulations. All HOME contracts and restrictive covenants contain safe harbor language approved by HUD.

Prior to the sale of a HOME-assisted unit to a first-time homebuyer, the developer must provide SCDH with documentation regarding applicant eligibility, evidence property will constitute their principal residence, and copies of deed provisions regarding resale of the property providing it will remain affordable for the designated period and providing for recapture of HOME funds by SCDH if the property is not sold to an eligible low-income buyer.

Fair return includes seller's payments which are long lasting in nature and add to the capital value of the property. These include additions, upgrades or modifications, and/or improvements that increase the size of the property or create a material addition. Such activities need to be documented by approved permits evidencing completed improvements or executed improvement contracts. Adding appliances such as garbage disposals, water heaters, cabinets, electrical repairs, landscaping, plumbing fixtures, carpets, painting, kitchen exhaust fans, shower doors, and tub enclosures are not eligible for consideration. These guidelines are placed in agreements with developers who shall include references to the recapture guidelines in associated sales

contracts, deeds of trust, mortgages, and deed restrictions.

When the initial homebuyer sells the HOME assisted unit to a non-eligible family, the seller will be entitled to pay-off of first/second mortgages, recover investment (or downpayment), and documented capital improvements expenses in that order. If proceeds remain, SCDH shall recapture the pro rata share of HOME subsidy that remains on a straight-line declining basis. The sales price may not prevent a low-income family from purchasing the home. In each case, the following applies in order: the seller can pay-off a first/second mortgage, the seller must determine if he will lower the sales price to comply with HOME regulations governing resale to eligible low-income families or, should proceeds remain, the seller is entitled to recover out-of-pocket downpayment costs and documented capital improvements expenses. If proceeds remain, SCDH shall recapture the pro rata share of HOME subsidy that remains on a straight-line declining basis. The amount repaid shall be reduced by a pro rata fraction according to the anniversary of the closing date.

If homeowner does not comply with the recapture option, has not made capital improvements, and seeks to sell the property at a price beyond the affordability of a low-income purchaser, the seller will be entitled to pay-off of first/second mortgages. Remaining proceeds may be recaptured by SCDH in an amount up to the full amount of the HOME subsidy assistance.

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

Units acquired with HOME funds are primarily associated with the CHDO program. In an effort to maintain the focus of the HOME Program, CHDOs shall include a provision in deeds of trust that ensures the housing unit assisted with HOME funds is maintained as an affordable housing unit for low-income families throughout the period of affordability. The deed of trust will need to have legal language in it that indicates whether the recapture or resale option was selected.

Recapture: The legal mechanism used to enforce the repayment of all or a portion of the direct HOME subsidy if the homeowner decides to sell the house within the affordability period. In selecting the recapture option the homeowner may sell the property to any willing buyer. The City requires full repayment of the direct HOME subsidy when resale occurs during the affordability period.

Resale: This option ensures that the HOME-assisted unit remains affordable over the entire affordability period. Therefore if the house is sold the new purchaser must be low-income in accordance with HOME regulations and the house must be the buyer's principle residence.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that

will be used under 24 CFR 92.206(b), are as follows:

SCDH will not be using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds.

SCDH will continue to market programs in an effort to attract more minority contractors. Currently, in an effort to recruit maximum minority participation, SCDH encourages minority contractors to get their General Contractors License, advertises rehabilitation bids in the local newspaper, runs public notices soliciting contractors (especially MBEs and WBEs) to participate in rehabilitation programs, provides direct mailings for each bid package to contractors on the rehabilitation vendors list and continuously seeks other methods of recruiting minority general contractors who can bid on larger rehabilitation activities. SCDH also works with the Shelby County Equal Opportunity Compliance Office and the Purchasing Department to ensure that minority-and women-owned firms take advantage of Shelby County's Locally-Owned Small Business Program (LOSB). During the program year, SCDH will continue to enroll and assist MBEs and WBEs to become more competitive and successful in the local market.