

CONSOLIDATED PLAN
PROGRAM YEAR 2022
PROPOSED ANNUAL ACTION PLAN
JULY 1, 2023 THROUGH JUNE 30, 2024
For Housing and Community Development

Prepared by:

Shelby County Department of Housing

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Annual Action Plan
2023

Executive Summary

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

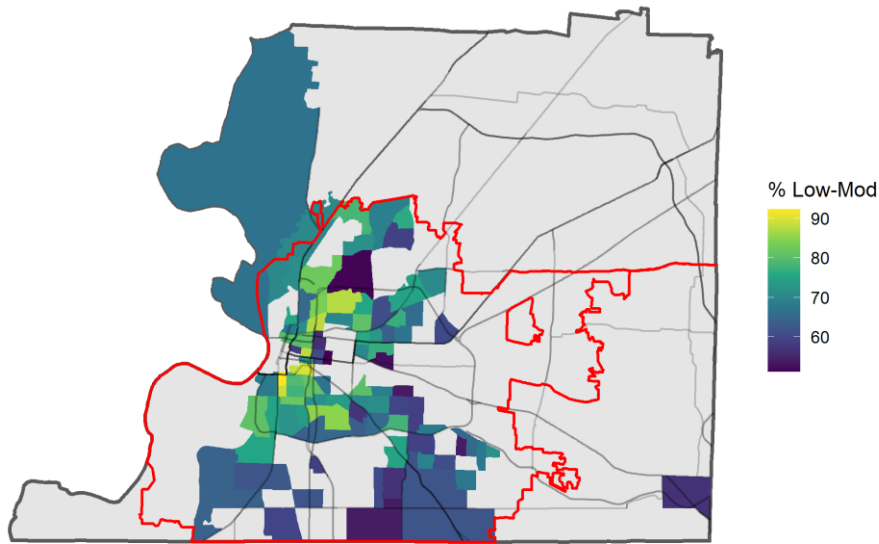
1. Introduction

This Annual Plan outlines the use of Program Year 2023 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, 2023 through June 30, 2024 and marks the fifth 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. 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 received notice of the official allocations for grantees on February 28, 2023. The anticipated budget figures are representative of the actual allocation amounts for PY23.

Low-Moderate Income Census Tracts in Shelby County
Tracts with at least 51% low-mod households



Source: FY21 HUD Low- and Moderate-Income Summary Data using ACS 2011-2015

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.

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

3. Evaluation of past performance

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 two public hearings via GoToMeeting and in person to solicit input on community development needs on Thursday, February 16, 2023 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*. Both in person and virtual options were offered at 12:00pm and 5:30pm. 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. Two people attended the 12:00pm session including a representative from the Women's Advocacy Center and a community leader from the Northaven Community Association.

SCDH also met with the Urban County Consortium Board on February 21, 2023 to review the planning process and discuss housing needs, non-housing community development needs, and public service

needs to also inform preparation of the proposed Annual Plan. This meeting helps to identify specific activities that will be included in the Proposed Annual Plan for July 1, 2023 through June 30, 2024.

The Proposed Annual Plan for July 1, 2023 through June 30, 2024 will be made available for public review from April 1, 2023 through April 30, 2023. The Proposed Annual Plan was made available electronically via email to the Memphis main public library listserv and by clicking on the Reports and Plans link under the Department of Housing webpage on the Shelby County website at <https://www.develop901.com/housing/planningReporting>. The Proposed Annual Plan was also available at Shelby County Department of Housing or the following library branches as these locations were now open to the public following the lift of pandemic restrictions: Benjamin Hooks Central Library, Arlington Library, Bartlett Library, Collierville Library, Germantown Library and Millington Library.

In order to solicit feedback on the Proposed Annual Plan, one virtual and in person public hearing will be held April 13, 2023.

The hearings and 30-day review period (April 1-30, 2022) were advertised in the *Memphis Flyer*, *the Daily News*, *the Millington Star*, *The Bartlett Express*, *The Germantown News*, *The Collierville Herald*, *Silver Star*, and *La Prensa (in Spanish)*. The details regarding the public review period and public hearings were also advertised on the SCDH website. Copies of all public notices published in newspapers are on file at SCDH.

Comments received covered both the approved HOME-ARP Allocation Plan (submitted as an amendment to AP3) and this draft Annual Action Plan (AP5) and are compiled and attached to this submission. The number of comments received via email during the public comment period of April 1-30, 2023 will be provided here following the public comment period.

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.

The Women’s Advocacy Center representative providing an overview of their programming and capacity to serve victims of domestic violence, and the needs associated with such service provision. Their needs include both emergency and temporary housing, law enforcement changes, program evaluation, and expansion of programming and service provision. Forms of service include legal assistance, bi-weekly meal support, improving access to children’s programming. The Northaven Community Association representative shared their community priorities including public facilities and expansions of the planned park infrastructure in the

coming year. The two participants also exchanged numbers and scheduled a follow up visit for ongoing mutual program coordination and support in the future.

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

At the time of preparation of this DRAFT plan, no comments or views were intentionally not accepted.

7. Summary

Based on allocations announced February 28, 2023 Shelby County will receive \$1,169,819 in CDBG funds and \$472,756 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, 2023 through June 30, 2024, SCDH will utilize these CDBG and HOME resources to accomplish the following:

1. Preserve Housing Affordability: complete rehabilitation on 15 owner-occupied homes
2. Improve and Construct Public Facilities: complete 4 infrastructure projects to address community development needs
3. Provide Public Services: provide recreational activities to benefit Senior Citizens in 20 persons and provide Fair Housing Counseling to an additional 20 persons
4. Create Opportunities for Affordable Housing Choice: Acquisition of one unit to create an affordable housing opportunity with CHDO set-aside funds

Planned activities for the program year to address impediments to fair housing in order to affirmatively further fair housing are described in section AP-75. The Regional Fair Housing Goals & Strategic Partnership Opportunities document in the attachments illustrates the goals associated with Shelby County's most recent Analysis of Impediments to Fair Housing.

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
HOME Administrator	SHELBY COUNTY	Department of Housing

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 along with the unincorporated areas of Shelby County), or their respective designee.

Consolidated Plan Public Contact Information

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

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(l))

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, Shelby County Division of Community Services, and Millington Housing Authority. Service providers including Memphis Center for Independent Living and The Women’s Advocacy Center also provided much needed input to identify needs related to vulnerable populations they serve.

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. The Women’s Advocacy Center also provided specific information related to victims of domestic violence at risk of homelessness which is captured in the public comments received during Public Hearings related to this plan and to help guide the implementation of HOME-ARP funds to address the priorities outlined in Shelby County’s approved Allocation Plan.

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

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 meetings were held in December 2022 and February 2023. A representative from this municipality was 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 meetings were held in December 2022 and February 2023. A representative from this municipality was 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 in December 2022 and February 2023. A representative from this municipality was 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 in December 2022 and February 2023. A representative from this municipality was 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 in December 2022 and February 2023. A representative from this municipality was 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 in December 2022 and February 2023. A representative from this municipality was provided a copy of the proposed annual plan.
7	Agency/Group/Organization	Northaven Community Association
	Agency/Group/Organization Type	Community Group
	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?	The Northaven Community Association represents an area of the unincorporated area of Shelby County and it predominantly low-income residents. A SCDH staff member attended their public meeting on March 7, 2023 to share updates and gather input on AP5 priorities and plans.

Table 2 – Agencies, groups, organizations who participated

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.
Coordinated Public Transit – Human Services Transportation Plan	Memphis Metropolitan Planning Organization (MPO)	SCDH is consulting a number of agencies to hear about service gaps and community needs, including transportation-related issues facing many of our residents. The Memphis MPO shared information to help guide types of public services or supportive services SCDH should consider funding in the upcoming planning cycles.
Memphis Area Climate Action Plan (CAP)	Memphis-Shelby County Division of Planning and Development, Office of Sustainability and Resilience (OSR)	SCDH works closely with other government departments including OSR. The CAP provides recommendations for energy efficiency that can be incorporated into rehabilitation and lead hazard reduction programs as funds are available.

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. The proposed annual plan was also made available on the Department of Housing webpage. SCDH also presented the Annual Planning Cycles and HOME-ARP supportive services context to the Memphis MPO's annual update to the Coordinated Public Transit – Human Services Transportation Plan Advisory Committee Meeting on March 16, 2023.

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 community development needs on February 16, 2023 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*, and *La Prensa* (in Spanish). 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. Two community members attended the meeting held at 12:00pm, no one attended the meeting held at 5:30pm. Both in person and virtual options were made available. SCDH also met with the Urban County Consortium Board on December 13, 2022 to review the planning process and discuss housing needs, non-housing community development needs, and public service needs to also inform preparation of the proposed Annual Plan and the HOME-ARP Allocation Plan. Another meeting was held with the Urban County Consortium Board on February 21, 2023 to confirm the project priorities that would be included in the Proposed Annual Plan for July 1, 2022 through June 30, 2023. This meeting also served as a platform for the Office of Sustainability and Resilience to discuss Energy Efficiency Block Grant funds that some of our urban county jurisdictions are eligible to receive and share how to utilize the region's Climate Action Plan to help coordinate project decision-making.

The Proposed Annual Plan for July 1, 2022 through June 30, 2023 will be made available for public review from April 1, 2023 through April 30, 2023. The Proposed Annual Plan will be made available electronically via email to the Memphis main public library listserv and also available throughout the comment period by clicking on the Reports and Plans link under the Department of Housing webpage on the Shelby County website at <https://www.develop901.com/housing/planningReporting>. The Proposed Annual Plan was also available at Shelby County Department of Housing and the following library branches including Benjamin Hooks Central Library, Arlington Library, Bartlett Library, Collierville Library, Germantown Library and Millington Library.

In order to solicit feedback on the Proposed Annual Plan, one in person and virtual public hearing will be held Thursday, April 13, 2023 at 12:00pm and 5:30pm. The hearings and 30-day review period (April 1-30, 2023) were advertised in the *Memphis Flyer*, *the Daily News*, *the Millington Star*, *The Bartlett Express*, *The Germantown News*, *The Collierville Herald*, *Silver Star News* and *La Prensa* (in Spanish). The details regarding the public review period and public hearings were also advertised on the SCDH website. Following those meetings updates will be made to this plan to capture any comments received. Copies of all public notices published in newspapers are on file at SCDH.

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 March 16, 2023 to promote a public hearing on Community Development Needs held on April 13, 2023.	

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)
2	Newspaper Ad	Non-targeted/broad community	N/A	No comments received	Not Applicable - Public Notice published in the DAILY NEWS on January 11, 2023 to promote a public hearing on Community Development Needs held on February 16, 2023.	
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 16, 2023 to promote a public hearing on Community Development Needs held on February 16, 2023.	

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)
4	Newspaper Ad	Non-targeted/broad community	N/A	No comments received	Not Applicable - Public Notice published in the BARTLETT NEWS in late January 2023 to promote a public hearing on Community Development Needs held on February 16, 2023.	
5	Newspaper Ad	Non-targeted/broad community	N/A	No comments received	Not Applicable - Public Notice published in the MILLINGTON STAR in late January 2023 to promote a public hearing on Community Development Needs held on February 16, 2023.	

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	Non-targeted/broad community	N/A	No comments received	Not Applicable - Public Notice published in the GERMANTOWN NEWS in late January 2023 to promote a public hearing on Community Development Needs held on February 16, 2023.	
7	Newspaper Ad	Non-targeted/broad community	N/A	No comments received	Not Applicable - Public Notice published in the COLLIERVILLE HERALD in late January 2023 to promote a public hearing on Community Development Needs held on February 16, 2023.	

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	Internet Outreach	Non-targeted/broad community	N/A	No comments received	N/A. Public notice was posted on the Housing department's main website landing page under "Notice of Public Hearings" ahead of the public comment period and throughout the comment period.	https://www.develop901.com/housing/planningReporting
9	Public Hearing	Non-targeted/broad community	Two community members attended along with two SCDH staff.	Comments made in person and captured in appendix attached.	Public hearing on housing, public service, and community development needs held on February 16, 2023.	

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-targeted/broad community	N/A	No comments received	Not Applicable - Public Notice published in the MEMPHIS FLYER in late March 2023 to promote the public review period (April 1-30, 2023) and public hearings on the Proposed Annual Plan scheduled for April 13, 2023.	

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)
11	Newspaper Ad	Minorities Non-English Speaking - Specify other language: Spanish	N/A	No comments received	Not Applicable - Public Notice published in the LA PRENSA LATINA in late March 2023 to promote the public review period (April 1-30, 2023) and public hearings on the Proposed Annual Plan scheduled for April 13, 2023.	

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 BARTLETT NEWS in late March 2023 to promote the public review period (April 1-30, 2023) and public hearings on the Proposed Annual Plan scheduled for April 13, 2023.	

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)
13	Newspaper Ad	Non-targeted/broad community	N/A	No comments received	Not Applicable - Public Notice published in the MILLINGTON STAR in late March 2023 to promote the public review period (April 1-30, 2023) and public hearings on the Proposed Annual Plan scheduled for April 13, 2023.	

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)
14	Newspaper Ad	Non-targeted/broad community	N/A	No comments received	Not Applicable - Public Notice published in the GERMANTOWN NEWS in late March 2023 to promote the public review period (April 1-30, 2023) and public hearings on the Proposed Annual Plan scheduled for April 13, 2023.	

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)
15	Newspaper Ad	Non-targeted/broad community	N/A	No comments received	Not Applicable - Public Notice published in the COLLIERVILLE HERALD in late March 2023 to promote the public review period (April 1-30, 2023) and public hearings on the Proposed Annual Plan scheduled for April 13, 2023.	

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)
16	Internet Outreach	Non-targeted/broad community	A total of 35 comments were received via email.	Comment summary can be found in the appendix attached to this plan.	N/A. Public notice was posted on the Housing department's main website landing page under "Notice of Public Hearings" ahead of the public comment period and throughout.	https://www.develop901.com/housing/planningReporting
17	Public Hearing	Non-targeted/broad community	TBD	TBD	N/A. Public hearing addressing the proposed amendment will be held April 13, 2023.	

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

Anticipated CDBG and HOME resources, including the updated PY2023 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	1,169,819	30,000	100,000	1,299,819	88,092	These anticipated resources are based upon actual allocation amounts for PY2023 released February 28, 2023.

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	472,756	20,000	25,000	599,126.10	209,346	These anticipated resources are based upon actual allocation amounts for PY2022 released May 13,2022.Note: including match funds (not included in this table but calculated as 25% of HOME subject to match which is total allocation minus 10% admin = \$431,166, 25% of which is \$107,791), an expected \$631,864 is available for HOME projects in PY22.
Other	public - federal	Other	1,557,263	0	0	1,557,263	0	HOME-American Rescue Plan (ARP) funds to provide supportive services to individuals and households who are homeless, at risk of homelessness, or other vulnerable populations.
Other	public - federal	Public Services	1,502,239	0	0	1,502,239	0	These supplemental funds are geared to helping prevent, prepare for, and respond to impacts from the COVID-19 pandemic. (CDBG-CV funds)

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 at least \$17,728.50 in private funds through nonprofit CHDO developers receiving the HOME CHDO set-aside funds and \$106,370.10 in local funds to meet HOME matching requirements. Project allocations in section AP-35 were made based on all available resources as listed in the table above as well as local match funds.

Private funds including a grant from the Urban Sustainability Directors Network continues to be managed by SCDH and will also serve as leveraged funds (\$69,000 total) that help address energy efficiency upgrades for low to moderate income homeowners receiving rehabilitation assistance or are part of the lead hazard reduction program.

If appropriate, describe publicly 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 PY2023 released February 27, 2023.

For PY2023, SCG was allocated \$8,182.00 more in CDBG dollars and \$6,317.00 less in HOME dollars in comparison to PY2022 allocations. Note there is also \$106,370.10 in HOME Match not included in the above table. This is calculated from using 25% of the amount of HOME subject to match (Allocation minus 10% admin = 425,480.40, and 25% of this amount = \$106,370.10).

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: \$230,855.20 HOME: \$505,937.05	Homeowner Housing Rehabilitated: 17 Household Housing Units
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 Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 150 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: \$70,914	Homeowner Housing Added: 1 Household Housing Unit

Table 5 – Goals Summary

Annual Action Plan
2023

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 citizens of the Urban County. Note that CDBG Public Services goal description and quantified beneficiaries do not include the CDBG-CV related public services offered in direct response to the COVID-19 pandemic.
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
7	CV- Public Service Activities
8	CV- Administration and Planning
9	HOME-ARP Homelessness Prevention Activities
10	HOME-ARP Administration and Planning

Table 6 - 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: \$230,855.20 HOME: \$472,756.00
	Description	Housing Rehabilitation or minor-home repair for low-and moderate-income owner-occupied homes including units under the Rehabilitation and Lead Hazard Control Programs (Minor Home Repair).
	Target Date	6/30/2024
	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. Note the funding allocation from HOME funds does not include \$106,370.10 in match that is provided by alternative sources.
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 ADA improvements to public facilities, water/sewer or pedestrian access infrastructure.
	Target Date	6/30/2024
	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 location and service area of the project(s). Dixon Brewer park will benefit approximately 1765 families, 39% of which are considered low- to moderate- income.
	Location Description	Bartlett, TN Alternatives include Collierville, Millington, and Northaven, TN
	Planned Activities	Planned activities include the following to address high priority community development needs: Parks and public space improvements, and alternatives include additional parks spaces and public facilities to benefit low- to moderate-income areas.
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 populations.
	Target Date	6/30/2024

- Commented [SD1]:** @Johnson, Sarah we need to determine this footprint and what we can realistically serve with the park. @Fletcher, Tom where is it again? let us know and we'll figure out a reasonable number for this.
- Commented [FT2R1]:** Depends on the area. I use this. [2020 Census - Census Tract Reference Map](#)
- Commented [FT3R1]:** Sorry, this: [Low- and Moderate-Income Area Data, based on 2011-2015 ACS \(arcgis.com\)](#)
- Commented [SD4R1]:** Where is the park though itself?
- Commented [FT5R1]:** Which Park?
- Commented [SD6R1]:** Dixon Brewer - Census Tract 206.51, Shelby County, Tennessee
- Commented [WS7]:** should we include Millington for added flexibility?
- Commented [SD8R7]:** i like that idea

	Estimate the number and type of families that will benefit from the proposed activities	At least 150 elderly persons will benefit from recreational services provided to senior citizens in the Urban County and another 5 individuals will benefit from Fair Housing counseling and/or litigation support.
	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 litigation support related to fair housing rights 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: \$70,914
	Description	
	Target Date	6/30/2024
	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 Shelby County, Tennessee
	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: \$210,000
	Description	Implementation of CDBG programs.
	Target Date	6/30/2024
	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 Shelby County, Tennessee

	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: \$233,963.80 HOME: \$47,275.60
	Description	General administrative and planning activities necessary to operate HOME and CDBG programs.
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	
	Planned Activities	N/A
7	Project Name	CV- Public Service Activities
	Target Area	Shelby County Urban County Entitlement Area
	Goals Supported	Provide Public Services
	Needs Addressed	Public Services
	Funding	CDBG-CV: \$1,276,903

	Description	Public Services activities in the Urban County to benefit special needs populations in order to prevent, prepare for, and respond to the Coronavirus in the form of mortgage and/or rent and/or utility assistance.
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	Public Services activities are expected to serve at least 15 households.
	Location Description	Shelby County Urban County Entitlement Area
	Planned Activities	Public service activities to benefit special needs populations in order to prevent, prepare for, and respond to the Coronavirus.
8	Project Name	CV- Administration and Planning
	Target Area	Shelby County Urban County Entitlement Area
	Goals Supported	Provide Public Services
	Needs Addressed	Public Services
	Funding	CDBG-CV: \$225,336
	Description	General administrative and planning activities necessary to operate CDBG-CV programs.
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	Shelby County Urban County Entitlement Area
	Planned Activities	General administrative and planning activities necessary to operate CDBG-CV programs.
	Project Name	HOME-ARP Homelessness Prevention Activities

9	Target Area	Shelby County Urban County Entitlement Area Shelby County, Tennessee
	Goals Supported	Provide Public Services
	Needs Addressed	Public Services
	Funding	HOME-ARP: \$1,323,674
	Description	Following the approval of the HOME-ARP Allocation Plan, SCDH plans to work with area stakeholders to provide supportive services to qualifying populations identified in the Allocation Plan.
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	SCDH anticipated helping 25 families during the coming year with supportive services provisions (following approval of the HOME-ARP Allocation Plan).
	Location Description	Shelby County Urban County Entitlement Area or other eligible area if seeking services elsewhere per Allocation Plan guidelines.
	Planned Activities	Provision of supportive services in accordance with the priorities identified and described in the HOME-ARP Allocation Plan (also available for public comment April 1-30, 2022).
10	Project Name	HOME-ARP Administration and Planning
	Target Area	Shelby County Urban County Entitlement Area Shelby County, Tennessee
	Goals Supported	Provide Public Services
	Needs Addressed	Public Services
	Funding	HOME-ARP: \$233,589
	Description	Following the approval of the HOME-ARP Allocation Plan, SCDH plans to administer HOME-ARP funds to address needs related to homelessness.
	Target Date	6/30/2024

Estimate the number and type of families that will benefit from the proposed activities	N/A
Location Description	Shelby County Urban County Entitlement Area
Planned Activities	General administrative and planning activities necessary to operate HOME-ARP programs.

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 Memphis.

Geographic Distribution

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

Table 7 - 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 the entire Urban County or be rotated among the urban county consortium members.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

Goals for households to be supported this coming planning year includes CDBG and HOME-funded programs under our home rehabilitation program but does not include supportive services or public services covered with CDBG-CV or HOME-ARP funds.

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	13
Special-Needs	5
Total	18

Table 8 - 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 9 - One Year Goals for Affordable Housing by Support Type

Discussion

Of the 18 planned households receiving support for affordable housing, 13 are expected to include housing rehabilitation including five 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 (MillHA) 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. MillHA was consulted during our stakeholder engagement process in developing the HOME-ARP Allocation Plan submitted as substantial amendment to AP3, which helped capture needs related to those at risk of homelessness.

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

In the coming program year, 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 also has a Resident Advisory Board that meets annually. Additionally, MillHA publishes a newsletter to engage and inform residents. In order to support new homeowner securing financing homes, SCDH plans to continue implementing a homebuyer down payment 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.

However, SCDH is in receipt of HOME-ARP funds as of September 2021 and has prepared an Allocation Plan in accordance with Notice CPD-21-10 and is making it available April 1-30, 2023 for public comment. Upon approval from HUD of this Allocation Plan, SCDH will administer these funds to address needs related to those experiencing homelessness, at risk of homelessness, or are one of the qualifying populations outlined in Shelby County's Allocation Plan.

The 901 Home, Together: Strategic Plan to End Homelessness in Memphis/Shelby County, the guiding set of strategies for the Memphis/Shelby County Continuum of Care, 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 builds on the successes of prior plans that called 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. Over the last three years, the number of permanent supportive housing beds has risen by 9% and the number of rapid rehousing beds has risen by 55%. Overall homelessness has decreased by 9% based on data collected and analyzed using the HUD HDX 2.0 system performance measures tool. HUD encourages communities to track Metric 3 "Number of Homeless Persons" to directly assess a CoC's progress; Community Alliance utilizes this tool to perform quarterly data quality assessments.

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 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, addressing issues of equity in housing and homelessness, and increasing income for clients. Ongoing data quality checks through our upgraded Homeless Management Information System (HMIS) allow us to better monitor how well programs are reaching these goals, which contribute towards the overall success of the community towards ending homelessness. Data dashboards have been publicly posted on the CAFTH website that help monitor system performance goals on a more ongoing basis, including updated data from the Point-in-Time (PIT) Count, System Performance Measures (SPMs), and Racial Disparities. Additionally, the sheltered and unsheltered Point-in-Time Count is conducted annually

to determine and assess needs of homeless persons, especially unsheltered persons.

In addition to improving system performance measures, a coordinated approach to referrals and outreach is led by the CoC. The community's outreach and engagement approach includes a 24/7 homeless hotline for families, two walk-in centers, and roving street outreach presence. For families with children, we have a centralized intake operated by Metropolitan Inter-Faith Association (MIFA); in 2022, the 24-hour Hotline for Homeless Families screened 8,804 calls (734 calls per month on average) from an estimated 6,562 callers representing 8,007 adults and 7,623 children. MIFA's Family Emergency Shelter Placement screened 2,858 unduplicated families for service and referred 600—representing 663 adults and 1,576 children—to shelters and 562 to rapid rehousing. Those who do not meet HUD's definition of literal homelessness are offered mediation and other prevention services, and those who do not have children are referred to service providers who serve single adults.

Through the continued implementation of the Coordinated Entry System (CES) for individuals, an Outreach Committee that includes street outreach and housing providers meets weekly to discuss and prioritize the most vulnerable literally homeless individuals using a "By-Name List (BNL)." The BNL affirms the importance of strong, engaged street outreach and the need to increase funding for outreach and SSI/SSDI Outreach, Access, and Recovery (SOAR) program activities. SOAR is a program for people who are experiencing homelessness, recently experienced homelessness, or are at risk of homelessness to have quick access to SSI/SSDI benefits. Our community continues to pursue additional funding to expand and enhance our street outreach presence and SOAR activities. This Outreach Committee also meets monthly for a housing prioritization meeting to review a current list of available housing ("Community Queue" in HMIS) and to discuss which clients are prioritized for housing based on their vulnerability as determined by their Vulnerability Index (VI-SPDAT) scores. This monthly session allows partners to better track housing openings, referrals, and active enrollments.

Addressing the emergency shelter and transitional housing needs of homeless persons

Data from the annual Point-in-Time and Housing Inventory Counts are used to assess emergency shelter and housing needs of homeless persons. Memphis/Shelby County has identified the need for low-barrier 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. Several agencies such as Hospitality Hub are currently working to expand low-barrier shelter capacity for single women. The need is also present for low-barrier emergency shelters for all populations, which in addition to having no fees includes shelter without stipulation of participating in services such as faith-based programming.

In November of 2022, Community Alliance for the Homeless secured funding for non-congregate emergency shelter, designated specifically for youth ages 18-24 and families. In three months, this funding has provided 2,106 nights of shelter to 163 people. Assistance will continue throughout 2023

until the funding is depleted. Census numbers to date underscore the need for additional shelter in the community.

Room in the Inn continues to operate an emergency shelter program during the winter months, prioritizing women and children who are experiencing unsheltered homelessness. This CoC partner tracks client data in HMIS and refers clients to other CoC partners nightly once they reach capacity.

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

To maximize permanent housing resources in Memphis/Shelby County, CAFTH and the CoC have developed landlord engagement strategies to better partner with flexible and low-barrier private market landlords. An Affordable Housing Resources page has been created on the CAFTH website, along with an interest form to attract new, potential landlord partners into the existing network. Agencies report that they visit this resource frequently in seeking housing for clients. An Affordable Housing Committee meets monthly to collaborate on ways to enhance access to affordable, low-barrier housing. Additional partnerships with affordable housing providers are being formalized to expand outflow capacity in the community. Community Alliance is working to leverage additional funding to support this initiative and to enhance the facilitation of future housing vouchers through the Memphis Housing Authority.

CAFTH and the CoC have an expanded voucher program in partnership with the Memphis Housing Authority. In 2021, the TN-501 Continuum of Care received an allotment of 190 Emergency Housing vouchers from the Memphis Housing Authority. As of December 2022, all of the initial 190 EHV's were successfully referred to MHA. Over 73% of referred clients have fully utilized, or are in the process of utilizing, their voucher and are in permanent housing. The CoC is currently working closely with MHA to resume accepting EHV referrals and assist clients with finding housing using their voucher, with the goal of utilizing the remaining 27% by August 2023. This data underscores the need for future allotments of vouchers to continue to shorten the time that individuals and families experience homelessness.

Memphis Housing Authority (MHA) and the CoC have partnered to develop several strategies to increase the availability of housing. One MHA initiative is based on a move-on strategy that could increase our housing availability. Our permanent housing programs are very successful, as evidenced by a 98% retention rate. Many of the residents have been there for many years, and some of those residents do not need or want the intensive services of PSH and would like to move into a more integrated setting. The main barrier for participants to move is finding affordable housing. This approach allows participants to move into mainstream housing, thereby creating more open PSH opportunities for people in the Coordinated Entry System who are waiting for housing.

The Coordinated Entry System is designed to ensure that all people experiencing a housing crisis have fair and equal access to the system and make the transition to permanent housing as quickly as possible. In 2022, Community Alliance expanded the Coordinated Entry System to include youth and families (in addition to single adults). Developing a CES that can serve all populations regardless of age will drastically increase access to housing and supportive services across the community. CAFTH will continue to engage with service agencies to participate in data collection and CES activities. Additionally, CAFTH has created a comparable database and has onboarded three Victim Service Provider agencies; this allows our Coordinated Entry System to serve clients fleeing domestic violence while protecting their privacy and security.

CAFTH also seeks to increase access to needed services by formalizing processes around assessment, intake, and diversion for internal and external CoC agencies, including those serving victims of domestic violence. CAFTH is currently gathering feedback from stakeholders on effective ways to implement Housing Problem Solving (diversion) according to best practices with community partners.

In tracking HDX 2.0 data on exits to permanent housing, Community Alliance has observed a 10% increase in exits to permanent housing since 2020. Metric 7, “Successful Placement and Retention of Housing” is based on aggregate data submitted by CoC partners via the Homeless Management Information System (HMIS). The goal for our community is to increase this percentage each year by increasing access to the community resources as described above.

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.

Homelessness prevention in the form of temporary (one-time or short-term) financial assistance is provided primarily through the Shelby County Community Services Agency (CSA) and Metropolitan Inter-Faith Association (MIFA). In fiscal year 2022, Shelby County Division of Community Services spent \$18.5 million on utility assistance and \$1.4 million on rent assistance & eviction prevention. Through this process they served 47, 165 people, 93% of whom were African-American. MIFA received 10,872 requests from unduplicated households for Emergency Services assistance; 2,888 (representing 3,460 adults and 3,905 children) received utility, rent, or mortgage assistance.

Our partnerships with public institutions, including the Department of Children’s Services, corrections, and hospitals, continue to improve. In 2022, CAFTH and the CoC launched their youth homelessness program, utilizing funds awarded through HUD’s Youth Housing Demonstration Program (YHDP). This \$3.8 million in funding will aim to reduce youth homelessness in Memphis and Shelby County. Currently CAFTH has assembled a Youth Action Board (YAB) comprised of area youth leaders, including

youth with lived experiences. This board of stakeholders will participate in programming and serve as an advisory council throughout the YHDP planning process. Youth Housing Navigators are now funded through this program and are currently working with Communities in Schools, Memphis & Shelby County Schools, and Le Bonheur Children’s Hospital to create system-wide impact on youth homelessness.

Regional One, a local hospital and nationally recognized Center of Excellence, continues implementing their Complex Care program that provides a service pathway to effectively address housing and supportive service needs for their most vulnerable patients including those experiencing homelessness. The program partners with service providers to connect patients with needed services, including housing and participation in the Coordinated Entry System (CES). CAFTH continues to promote and refer clients to free or discounted health services from Christ Community Health Services, Baptist Operation Outreach, and Regional One. CAFTH provides a continually updated resource guide with health service information on our website. Additionally, CAFTH works to build new health systems partnerships to improve public health and the delivery of healthcare services. This includes the launch of a formal Healthcare Committee with a goal of increasing access to healthcare for persons experiencing homelessness.

Shelter provider Room in the Inn continues to provide respite care to those who are homeless and have had medical procedures that make it unsafe for them to discharge to a shelter or unsheltered homelessness. CAFTH offers support to their 21-bed Recuperative Care Center partner by connecting participants in the program to long-term housing through the Coordinated Entry System.

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 to address fair housing concerns in the region. The Regional Fair Housing Goals & Strategic Partnership Opportunities document in the attachments illustrates the goals associated with Shelby County's most recent Analysis of Impediments to Fair Housing. Unless otherwise specified, both the City and the County intend to pursue the stated goals.

In year four, 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). Additionally, SCDH will implement a post-rehabilitation counseling program aimed at clients who go through the SCDH Rehabilitation Program. One staff member will also be trained and certified as HUD Housing Counselors in an effort for the department to become a HUD Certified Housing Counseling Agency (Goal 2A). For the remaining goals to address 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.

SCDH has also contributed throughout 2020-2022 to the generation of a joint city and county Housing Policy Plan, helping guide how to address needs related to affordable housing and help identify tangible programs and interventions that will help address the gaps in locally available, quality affordable housing. SCDH will work to implement the goals and strategies outlined in this plan to better meet local needs and gaps in service delivery.

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 2023 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 ensure 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 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:

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 was estimated based on an average of program income accrued to previous years as reported in the last four Consolidated Annual Performance Reports (CAPERs). SCDH will not be receiving any Section 108 loan proceeds, surplus funds from urban renewal settlements, grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan, or income from float-funded activities. SCDH does not plan to expend funds on any Urgent Need activities. SCDH intends to use 100% of CDBG funds (subject to the low/mod benefit calculation) for activities that benefit persons of low- and moderate-income.

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(l)(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 principal 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 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 newspapers, runs public notices soliciting contractors (especially MBEs and WBEs) to participate in rehabilitation programs, provides direct electronic 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.