

STATE OF TENNESSEE

FISCAL YEAR 2014-15

CONSOLIDATED ANNUAL PERFORMANCE AND EVALUATION REPORT



TENNESSEE HOUSING DEVELOPMENT AGENCY

TENNESSEE DEPARTMENT OF ECONOMIC AND COMMUNITY DEVELOPMENT

TENNESSEE DEPARTMENT OF HEALTH

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STATE OF TENNESSEE
FISCAL YEAR 2014-15 CAPER
EXECUTIVE SUMMARY

The Consolidated Annual Performance and Evaluation Report (CAPER) serves as the State of Tennessee's annual performance report to the U.S. Department of Housing and Urban Development (HUD) for four formula grant programs; Community Development Block Grant (CDBG), Home Investment Partnership Program (HOME), Emergency Solutions Grants (ESG) and Housing Opportunities for Persons Living with AIDS (HOPWA). The reporting period for the Fiscal Year (FY) 2014-15 CAPER is July 1, 2014 – June 30, 2015. As in previous years, the annual reports completed by each agency are included as appendices to this document.

In January 1995, the final rule "Consolidated Submission for Community Planning and Development Programs" was published in the Federal Register. The final rule amended HUD's regulations for Comprehensive Housing Affordability Strategies (CHAS) with a single rule that consolidated the planning, applications and reporting aspects of the four formula grant programs. The names of the grant programs, the administering state agencies and the HUD allocations for (FY) 2014-15 are as follows:

- Community Development Block Program (CDBG) administered by the Tennessee Department of Economic and Community Development (ECD), \$25,160,023
- HOME Investment Partnership Program (HOME) administered by Tennessee Housing Development Agency (THDA), \$10,096,577
- Emergency Solutions Grants (ESG) administered by THDA, \$2,734,930
- Housing Opportunities for Persons with AIDS (HOPWA) administered by the Tennessee Department of Health (DOH), \$939,055

In addition to discussing the resources made available to the State of Tennessee in FY 2014-15 through the four formula programs, this document reports the performance of the State of Tennessee in meeting objectives and action steps contained in the 2010-15 Consolidated Plan and assesses the state's overall performance in meeting affordable housing goals. The state has again incorporated the "Optional Table 3B: State Annual Housing Completion Goals" found in Appendix E of this report, to better link HUD's outcome system to the State of Tennessee's objectives, action steps, activities and performance measures.

Other affordable housing resources made available to the state or had an impact on the state's performance are also discussed and include HUD's Section 8 Tenant Based Housing Choice Voucher and Project Based Rental Assistance Programs, the THDA Homeownership Programs, the THDA Rural Repair Program, the THDA BUILD Loan Program, the Community Investment Tax Credit Program, the THDA Emergency Repair Program (ERP), the Low-Income Housing Tax Credit (LIHTC) Program and the Multi-Family Bond Authority.

The State of Tennessee contracted with Western Economic Services to conduct the Analysis of Impediments (AI) to Fair Housing Choice for the non-entitlement jurisdictions of the state. The Analysis was the culmination of public forums, surveys, data analysis and other public comments on fair housing issues in the state. The report was finalized July 12, 2013 and identifies public and private sector impediments along with suggested actions. The state has developed activities to address the findings contained in the AI and has developed a comprehensive Fair Housing Plan to overcome the

impediments, which was published in the FY 2014-15 Annual Action Plan and is included in this FY 2014-15 CAPER. These activities address the identified impediments and show the Consolidated Partners' commitment to affirmatively furthering fair housing in Tennessee. The Consolidated Partners will use the AI for the next several years to continue to address impediments. The AI is available on the THDA and ECD websites.

While THDA has been designated as the lead agency for Tennessee's consolidated planning requirements, all of the administering agencies of the four formula grant programs participate in the development of the CAPER and administration of their respective programs. The FY 2014-15 CAPER represents the cooperation of these agencies to further affordable housing and community development in Tennessee. In addition, the plan is developed in consultation with the citizens of our state. The draft plan is made available for review and public comment according to the guidelines developed by the five-year Consolidated Plan.

PART I DESCRIPTION OF RESOURCES

I. DESCRIPTION OF THE RESOURCES MADE AVAILABLE

HUD Resources Made Available Under the Consolidated Planning Programs

A. Community Development Block Grant (CDBG) Small Cities Program

The primary statutory objective of the CDBG program is to develop viable communities by providing decent housing and a suitable living environment and by expanding economic opportunities, principally for persons of low- and moderate-income. The State of Tennessee, through the Department of Economic and Community Development (ECD), administers the CDBG program for all jurisdictions in the state, except for 17 entitlement areas. THE CDBG Small Cities Program received an allocation of \$25,160,023 from HUD for FY 2014-15. In addition to administering the program, each year ECD prepares the State Grant Performance/Evaluation Report (PER). The PER for FY 2014-15 is included as Appendix A of this document.

B. HOME Investment Partnership (HOME)

The HOME Program is an affordable housing program that provides federal funds to states and the local PJs to carry out multi-year housing strategies. The purpose of the program is to expand the supply of decent, safe, sanitary and affordable housing for low- and very low-income households. Local governments, public agencies and non-profit organizations are all eligible applicants for HOME funds. The Community Programs Division of THDA administers the HOME Program for the State of Tennessee. THDA administers the HOME Program for those jurisdictions not designated by HUD as a local Participating Jurisdiction (PJ). The local PJs that receive HOME funds directly from HUD are: Clarksville, Chattanooga, Jackson, Knoxville, Memphis, Nashville-Davidson County, Knox County, Shelby County and the Northeast Tennessee/Virginia Consortium (the Cities of Bluff City, Bristol, Johnson City, Kingsport, Sullivan County and Washington County, excluding the Town of Jonesborough).

On December 16, 2011, HUD published a new proposed regulation for the HOME Program which made significant changes to the HOME rule. Because the new HOME rule applied to all grants from 2012 funds and beyond, THDA opted not to accept any applications for 2012 until the final rule was released. The final rule was not published until July 23, 2013 which meant that THDA did not award any HOME funds during FY 2012-13. The state received an allocation of \$9,924,071 for program year 2012, had \$1,488,312 from 2011 funds and \$231,639 in program income for a total of \$11,644,022 from 2012. The state then received an allocation of \$9,474,797 for program year 2013 and had \$98,797 in program income for a total of \$9,573,594 from 2013. Although the funds were awarded during FY 2013-14, all of the contracts except those for 2012 Community Housing Development Organization (CHDO) funds started in FY 2014-15. Therefore THDA is reporting on FY 2012-13 funds and activity during this reporting period.

For 2014, the HOME Program received an allocation of \$10,096,577. In addition to HUD's yearly allocation, for FY 2014-15, THDA had \$129,241 in program income and \$417,288 of reallocation funds for a total of \$10,643,106. More than \$8 million of these funds were awarded competitively to local communities and non-profit agencies; the remaining funds were awarded to CHDOs. Note that these

2014 funds were awarded during this reporting period, but were not executed until July 2015. Therefore, the 2014 HOME funds and activity will be reported in the FY 2015-16 CAPER.

C. Emergency Solutions Grants (ESG) Program

The ESG Program provides funding to local governments and private, non-profit service providers to assist homeless and at-risk for homeless individuals and families in Tennessee. The program is administered by the Tennessee Housing Development Agency (THDA). THDA shares the 7.5 percent administrative costs with cities that receive an allocation through the state’s ESG program.

The 2013 ESG funding awarded the first \$100,000 of ESG funds, which did not need a match, to seven Mental Health Regional Housing Coordinators who provide homeless assistance programs for the mentally disabled. This activity will meet HUD’s Discharge Planning requirement to ensure that persons being released from hospitals, prisons and mental health facilities are not discharged with no place to go. For this reporting period, 52 percent of the remaining funds were awarded to 11 entitlement cities in a formula-based allocation. The remaining 48 percent was awarded on a competitive basis to non-profits throughout the state. This grant term is July 1, 2014 – June 30, 2015. During this reporting period, \$2,226,946 was awarded for street outreach, the operation and maintenance of homeless shelters, essential services, homeless prevention, rapid re-housing, data collection and program administrative costs.

The 2014 ESG funding application round awarded the first \$100,000 of ESG funding, which did not need a match, to two non-profit agencies who provide services to homeless youth under the age of 24. The City of Knoxville was ineligible to continue as a participating jurisdiction under ESG and therefore received a special set-aside allocation of \$130,308. The remaining funds were placed in a special competitive application round in the fall of 2014, with an emphasis on Rapid Re-Housing. Eleven applicants were funded for a total of \$823,591. This grant term is January 1, 2015 – December 31, 2015.

The remaining 2014 ESG funding will be awarded during the 2015 ESG funding application round.

**Recap of ESG Resources Made Available
All Programs: 2014-2015**

Program Year	Amount
ESG 2013	\$2,226,946.00
ESG 2014	\$1,135,946.00

D. Housing Opportunities for Persons with AIDS (HOPWA)

HOPWA provides funding to nonprofit service providers to offer housing assistance and related supportive services to persons living with HIV/AIDS and their families. The Tennessee Department of Health (DOH) administers the program for the State of Tennessee and provides funds to seven project sponsors across the state that directly administer the program. HOPWA funds are used to provide assistance in the following five categories: Housing Information Services; Housing Assistance (Short-term

Rent, Mortgage and Utility Payment Program); Supportive Services; Permanent Housing Placement; and Ongoing Housing Assessment Plans. HOPWA funds are also used towards the state's administrative costs and the administrative costs of service providers. The FY 2014-15 allocation for the HOPWA Program for Tennessee was \$939,055. DOH prepared the annual HOPWA report, which can be found in Appendix D of this document.

Other Resources Made Available

E. HUD Section 8 Tenant Based Housing Choice Voucher Program

THDA administers the Section 8 Tenant Based Housing Choice Voucher (HCV) program. The Rental Assistance Division of THDA, which administers the Section 8 Housing Choice Voucher program, operates in 72 of Tennessee's 95 counties. During the reporting period, approximately \$30,563,240 was made available for the Section 8 Tenant Based HCV program.

F. HUD Section 8 Project Based Rental Assistance

The Contract Administration Division of THDA administers the Section 8 Project Based contracts and is responsible for the monthly Housing Assistance Payments (HAP) to Section 8 properties throughout the state. At the end of the reporting period, 28,976 units of affordable housing were provided. HAP for the year were \$157,686,804.

G. Low Income Housing Tax Credit Program

The Low Income Housing Tax Credit (LIHTC) program is authorized under Section 42 of the Internal Revenue Code and is administered throughout Tennessee by THDA. The program offers owners of and investors in low-income rental housing a reduction in federal income tax liability over a period of 10 years. The Internal Revenue Service allocates tax credit authority to states on a calendar year basis. The State of Tennessee does not receive actual dollars, but instead receives tax credit authority. In Calendar Year (CY) 2014, the state was authorized to allocate \$14,945,832 in competitive 2014 tax credits to non-profit and for-profit developers of low-income housing. THDA allocated \$14,945,832 tax credits in 2014. Additionally, THDA allocated \$1,572,977 in non-competitive credits available for non-profit and for-profit developers in conjunction with the Multifamily Bond Authority Program. The cumulative tax credits allocated during the reporting period was \$16,518,809.

H. Multifamily Bond Authority

THDA authorizes allocations of tax-exempt bond authority to local issuers for financing of multifamily housing units in the state. The authority can be used to provide financing for new construction of affordable rental housing units, conversion of existing properties through adaptive reuse, or acquisition and rehabilitation of rental units. Applications are scored and points are awarded based on certain scoring criteria. In addition, some units must be occupied by households with low-income: 20 percent of the units must be occupied by households with incomes no greater than 50 percent of area median income (AMI), or 40 percent of the units must be occupied by households with incomes no greater than 60 percent of AMI. Seventy-five percent of the units must be occupied by households with incomes no greater than 115 percent of the AMI. In CY 2014, THDA used \$25,075,000 to create or renovate rental apartments.

I. THDA Homeownership Programs

Until October 2013, the Great Rate, Great Start and Great Advantage Programs were the basic homeownership programs to provide opportunities for low- and moderate-income persons to purchase their first home¹. The Great Rate Program was a low interest rate loan program for low- to moderate-income families. Great Advantage offered an interest rate slightly above Great Rate and borrowers received two percent of the mortgage amount to be used for down payment and/or closing costs. Great Start provided four percent of the purchase price in down payment or closing costs assistance in exchange for a slightly higher interest rate than the interest rate on the Great Advantage Program.

Starting in October 2013, THDA discontinued offering Great Rate, Great Start and Great Advantage program loans and introduced the Great Choice and Great Choice Plus loan programs. The Great Choice Program loan offers a 30-year, fixed rate mortgage to first-time homebuyers. The Great Choice Plus loan is a second mortgage loan offering down payment and closing cost assistance at no interest in conjunction with a Great Choice loan. The second mortgage loan amount is equal to four percent of the sales price of the home and is deferred for 15 years and forgiven after that.

THDA also has New Start homeownership program, which is a zero percent mortgage loan program delivered through non-profit organizations that have established programs for the construction of single family housing for low- and very low-income households. It is designed to promote single family construction for very low-income families². All of THDA's homeownership programs include limitations on eligibility based on household income and acquisition costs.

THDA is not a direct lender to borrowers, but works with approved mortgage lenders that originate the loans across the state. THDA purchases approved loans from the lenders after the loans are closed. At the end of the reporting period, THDA first mortgage loans totaled \$240 million. THDA also funded second mortgage loans. The total value of those second mortgage loans was \$9.1 million.

J. BUILD Loan Program

In November 2005, THDA initiated the BUILD Loan Program to build the capacity of nonprofit organizations to provide affordable housing to low-income Tennesseans. However, during FY 2014-15 the BUILD Loan Program officially ended with board approval. Therefore, no BUILD activities occurred during the FY 2014-15 reporting period.

K. Community Investment Tax Credit

THDA administers the Community Investment Tax Credit (CITC) in cooperation with the Tennessee Department of Revenue. CITC allows financial institutions to obtain a credit against the sum total of taxes imposed by the Franchise and Excise Tax Laws when qualified loans, investments, grants or contributions are extended to eligible housing entities for engaging in eligible low-income housing activities. Eligible housing entities include Tennessee based non-profit organizations, public housing

¹ The first-time homeownership requirement is waived for persons who wish to purchase a home in one of the federally targeted areas and veterans. A Targeted Area is a qualified census tract or an area of chronic economic distress as designated by the IRS.

² Effective January 23, 2006, the New Start Program became a two-tiered program. Tier I is still zero percent loan program for very low-income (60 percent or less of the state median income) people. Tier II allows the borrower to have a slightly higher income (70 percent of the state median income) than Tier I, and in exchange the borrower pays a low fixed interest rate (half of the interest rate on the Great Rate program).

authorities and development districts. Eligible activities under CITC include activities that create or preserve affordable housing for low-income Tennesseans, activities that assist low-income Tennesseans in obtaining safe and affordable housing, activities that build the capacity of an eligible non-profit organization to provide housing opportunities for low income Tennesseans and any other low-income housing related activity approved by the THDA Executive Director and the Commissioner of the Tennessee Department of Revenue. The amount of the credit is applied one time and is based on the total amount of the loan, investment, grant or contribution; or the credit may be applied annually for qualified loans and qualified low rate loans and are based on the unpaid principal balance of the loan. During FY 2014-15, THDA and the Tennessee Department of Revenue, awarded credits through CITC for 67 different affordable housing projects with a total investment of \$54,027,643.

L. Emergency Repair Program

In January 2007, THDA created the \$2 million statewide Emergency Repair Program (ERP). The program provides grants to low-income homeowners who are 60 years old or older to correct, repair or replace an essential system and/or critical structural problem. The purpose of the program is to stabilize the elderly homeowner's residence by making rapid, essential repairs to make the home livable. In FY 2014-15, the ERP program was administered through eight of Tennessee's nine Development Districts and the Southwest Human Resource Agency (SWHRA). THDA provided \$1,310,770 including an additional \$128,203 available for administrative costs. The total funds available during the reporting period, with the required match by the Development Districts, was \$2,303,022.

M. Rural Repair Program

THDA partners with the Rural Housing Service (RHS) division of the US Department of Agriculture (USDA) for its Rural Repair Program. The program offers grants and loans to assist rural, low-income homeowners in need of repairs that will remove health or safety hazards or will help improve accessibility for a homeowner with a disability. The THDA grant is restricted to 50 percent of the RHS approved repair costs and cannot exceed \$7,500 per household for elderly or disabled homeowners. For non-elderly, non-disabled households, the THDA grant is restricted to 30 percent of the RHS approved repair costs and cannot exceed \$5,000 per household. Households can receive a loan and a grant for a maximum of \$27,500 for their home. The THDA portion of the program offers grants only. During FY 2014-15, THDA provided \$801,850 to the program.

Summary

During FY 2014-15, the State of Tennessee had over \$523 million available to assist its low- and moderate-income citizens with housing and community development. Federal assistance through the four formula grant programs covered by the 5-year Consolidated Plan totaled over \$41 million. Other resources made available for housing and community development amounted to over \$482 million. The following sections of this report will demonstrate how these programs assisted low- and moderate-income Tennesseans during FY 2014-15 with the available resources.

Table 1
Summary of Resources Made Available During FY 2014-15
All Programs

Program	Funds Made Available
<i>Consolidated Plan Grant Programs</i>	
Community Development Block Grant (CDBG)	\$25,160,023
HOME Investment Partnership (HOME) ³	\$12,074,278
Emergency Solutions Grants (ESG)	\$3,362,892
Housing Opportunities for Persons with AIDS (HOPWA)	\$939,055
<i>Subtotal of Consolidated Plan Grant Programs Resources Available</i>	<i>\$41,536,248</i>
<i>Other Resources Made Available</i>	
Section 8 Tenant Based Rental Assistance	\$30,563,240
Section 8 Project Based Rental Assistance	\$157,686,804
Low Income Housing Tax Credit	\$14,945,832
- Non-competitive Tax Credits	\$1,572,977
Multifamily Bond Authority	\$25,100,000
THDA Homeownership Programs ⁴	\$249,054,831
BUILD Loan Program	\$0
Emergency Repair Program	\$2,303,023
Rural Repair Program	\$801,850
<i>Subtotal of Other Resources Made Available</i>	<i>\$482,028,557</i>
Grand Total	\$523,564,805

³ Includes funding from 2012 and 2013 Program Years; excludes 2012 CHDO funds.

⁴ Includes 1st and 2nd mortgage loans.

II. INVESTMENT OF AVAILABLE RESOURCES

HUD Resources Made Available Under the Consolidated Planning Programs

A. Community Development Block Grant (CDBG) Small Cities Program

During the reporting period, 82 awards were contracted to new subrecipients or city and county governments totaling \$29,369,086 through the CDBG Program. This amount included the 2014-15 award amount plus additional funds that were recaptured, unspent funds from completed projects from previous years and CDBG loan repayment funds from the CDBG Economic Development Loan Program. The awards included an Imminent Threat grant that was awarded outside of the regular round application process based on immediate need in the affected community. The awards also included ten Commercial Façade projects of \$25,000 each. This was the second year that the Commercial Façade category of funding was available.

The activities proposed by subrecipients with contracts are summarized in the following table. Each number in the frequency column represents a local government recipient carrying out the described activity. Each local government may carry out multiple activities. More detailed information is contained in the PER (Appendix A). The CDBG program allows for contracts between ECD and local governments to vary in term. Many contracts continue into subsequent fiscal years. As was the case in previous years, the largest portion of funds awarded (79 percent) was designated for public facilities improvements.

Table 2
Awards by Activity Type
CDBG Program

Activity	CDBG Activity Number	Frequency	Amount	Percent of Total Funds
Clearance	2, 6, 6(P)	15	\$3,101,132	10.6%
Relocation	8	1	\$195,000	0.7%
Administration, Planning and Management	13, 13(P)	82	\$1,748,667	6%
Public Facilities, Water/Sewer	4A, 4B, 4C	55	\$23,119,025	78.7%
Residential Rehabilitation	9A, 14A	4	\$980,262	3.3%
Commercial Rehabilitation	9	10	225,000	0.8%
Total	-	167	\$29,369,086	100%

B. HOME Investment Partnership (HOME)

During FY 2014-15, THDA distributed \$14,282,052 in program funds for the 2012 and 2013 Urban and Rural rounds. THDA also distributed \$969,914 of 2012 Supportive Housing Program funds and \$1,431,172 of 2013 CHDO Program funds. In total, THDA distributed \$16,683,138 in program funds during FY 2014-15.

The state may spend up to 10 percent of its allocation for administrative and planning expenses. The state uses three percent of the total funds available for its own administrative expenses and the remaining seven percent is available to pay the administrative costs of the local government and non-

profit grant recipients. Fifteen percent of the total allocation is reserved for eligible Community Housing Development Organizations (CHDOs) and 10 percent of the total allocation is reserved for Special Needs projects.

**Table 3
Proposed Activities
HOME Program**

Eligible Activity	Number of Units/HHs	Program Funds
Homeownership Down Payment Assistance	12 HHs	\$185,309
Homeowner Rehabilitation	412 HHs	\$14,096,743
Homeowner New Construction	19 Units	\$1,431,172
Homeowner/Rental New Construction	0 Units	\$0
Rental Acquisition and Rehabilitation	9 Units	\$969,914
Rental New Construction	0 Units	\$0
Total	452 Units/HHs	\$16,683,138

C. Emergency Solutions Grants (ESG)

The state allocated \$2,226,946 in FY 2013-14 for the ESG Program. This amount was subdivided as follows:

**Table 4A
FY 2013 – 14 Funds Made Available
ESG Program**

Funding Category	Allocation of FY 2013 ESG Funding
Small Cities Set-Aside	\$ 1,055,902.00
TDMHSAS Set-Aside	\$ 100,000.00
ESG Competitive Round	\$ 1,004,236.00
Program Total	\$ 2,160,138.00
State Administration	\$ 66,808.00*
Total FY 2013	\$ 2,226,946.00

*Unused program funds will be reallocated to the State’s administration funds up to 7.5% of the grant.

The state allocated \$ 1,135,946 in FY 2014-15 ESG funds. This amount is subdivided as follows:

Table 4B
FY 2014 – 15 Funds Made Available
ESG Program

Funding Category	Allocation of FY 2014 ESG Funding
Homeless Youth Set-Aside	\$ 100,000.00
City of Knoxville	\$ 130,308.00
ESG Competitive Round	\$ 823,591.00
Program Total	\$ 1,053,899.00
State Administration	\$ 82,047.00
Total FY 2014	\$ 1,135,946.00

D. Housing Opportunities for Persons with AIDS (HOPWA)

During FY 2014-15, the Tennessee Department of Health (DOH) awarded \$939,055.00 to the seven project sponsors across the state, administering the HOPWA Program. Contracts between DOH and the project sponsors are for five-year terms amended annually and coincide with the state’s fiscal year (July 1 – June 30). DOH retains three percent of the total allocation for state administrative costs. Grantees that were awarded funding during the reporting period and the state’s administrative costs are shown in the table below.

Table 5
Distribution of Funds
HOPWA Program

Project Sponsor	Funding Amount	Percent of Total Funding
Chattanooga CARES	\$212,600.00	23%
Columbia CARES	\$82,000.00	9%
East Tennessee Human Resource Agency	\$271,200.00	30%
Frontier Health	\$91,100.00	10%
Nashville CARES	\$54,200.00	6%
Upper Cumberland Human Resource Agency	\$63,200.00	7%
West Tennessee Legal Services	\$136,600.00	15%
<i>Program Subtotal</i>	<i>\$910,900.00</i>	<i>97%</i>
State Administration	\$28,155.00	3%
Total	\$939,055.00	100%

Formula Distribution Method: Total Award x 3% = State Administration (Total State Administration was adjusted due to rounding not to exceed 3%), State Administration minus Total Award = Program Subtotal, Regional Distribution of funds was determined by the ratio of HIV/AIDS cases reported in each region to the total number of cases reported statewide as of 2009. Cumulative # of persons living with HIV/AIDS was 5377 statewide in 2009. (ex. Total # of cases within a region divided by total statewide cases 1695 East TN /5377 statewide = %) with minor adjustments according to regional spending patterns and rounding.

Other Resources Made Available

E. HUD Section 8 Tenant Based Housing Choice Voucher Program

The THDA Rental Assistance Division administers the Section 8 Tenant Based Housing Choice Voucher program through nine field offices throughout the state and provides services to the families participating in the program. In FY 2014-15, the HUD provided \$30,563,240 for the Housing Choice Voucher program and THDA expended \$33,167,742 for Section 8 Housing Choice Voucher Program. THDA utilized remaining funds from the previous year in order to expend \$33,167,742 for this reporting period.

F. HUD Section 8 Project Based Rental Assistance

The THDA Contract Administration Division administers Project Based units throughout the state. During FY 2014-15, the Housing Assistance Payments (HAP) totaled \$157,686,804.

G. Low Income Housing Tax Credit Program

The State of Tennessee used its 2014 tax credit authority in the amount of \$14,945,832 during the reporting period. Additionally, the state issued \$1,572,977 in non-competitive allocations during the reporting period. The State of Tennessee used its tax credit authority to make available tax credits for non-profit and for-profit developers of affordable housing.

H. Multifamily Bond Authority

THDA allocates a maximum of \$15,000,000 of tax-exempt bond authority to a development involving new construction and \$17,250,000 for developments involving conversion and/or acquisition. Points are awarded to applications demonstrating that developments address certain conditions – meeting housing needs, meeting energy/maintenance standards, serving special populations and increasing housing stock. In Calendar Year 2014, a total of \$25.1 million was allocated.

I. THDA Homeownership Programs

During the reporting period, there were 2,028 first mortgage loans made through the THDA's homeownership programs totaling \$239,995,354. In October 2013, THDA switched to a new loan program called Great Choice, which offers a 30-year fixed mortgage loan. If the borrowers need assistance for the downpayment and closing costs they can get a second mortgage loan with a zero interest rate in conjunction with the Great Choice Plus Program. The New Start program, delivered through non-profit organizations, promotes construction of new homes for very low-income Tennesseans. THDA homeownership programs generally serve first-time homebuyers (those who have not owned their principal residence within the last three years), but serve all eligible homebuyers who

are buying in federally targeted areas⁵ and who are veterans⁶. THDA loans are available for primary residences only, and limits on household income and acquisition price vary by county.

Table 6
Single Family Loans
THDA Homeownership Programs

Program	Number of Loans	Percent of All Loans	Average Loan Amount	Total Loan Amount
Great Choice	87	4.3%	\$100,552	\$8,748,012
Great Choice Plus	1,849	91.2%	\$120,600	\$222,988,525
New Start	92	4.5%	\$89,770	\$8,258,817
Total	2,028	100%	\$118,341	\$239,995,354

J. BUILD Loan Program

In November 2005, THDA initiated the BUILD Loan Program to build the capacity of nonprofit organizations to provide affordable housing to low-income Tennesseans. However, during FY 2014-15 the BUILD Loan Program officially ended with board approval. Therefore, no BUILD activities occurred during the FY 2014-15 reporting period.

K. Community Investment Tax Credit

THDA administers the Community Investment Tax Credit (CITC) in cooperation with the Tennessee Department of Revenue. CITC allows financial institutions to obtain a credit against the sum total of taxes imposed by the Franchise and Excise Tax Laws when qualified loans, investments, grants or contributions are extended to eligible housing entities for engaging in eligible low income housing activities. The amount of the credit is applied one time and is based on the total amount of the loan, investment, grant or contribution; or the credit may be applied annually for qualified loans and qualified low rate loans and are based on the unpaid principal balance of the loan. During FY 2014-15, THDA and the Tennessee Department of Revenue, awarded credits through CITC for 67 different affordable housing projects with a total investment amount of \$54,027,643.

L. Emergency Repair Program

During the reporting period, the eight Development Districts and one Human Resource Agency that administer the Emergency Repair Program (ERP) spent a total of \$2,303,022 to correct, repair or replace an essential system and/or critical structural problem for low income and elderly homeowners. Of this total, \$1,310,770 was provided by THDA and THDA provided an additional \$128,203 for administrative costs. The seven Development Districts and one Human Resource Agency provided \$864,048 in match

⁵ A Targeted Area is a qualified census tract or an area of chronic economic distress as designated by the IRS. A Targeted Area may be an entire county or a particular census tract within a county.

⁶ Starting February 28, 2007, THDA implemented the veteran exemption. With that exemption, veterans and their spouses do not have to meet the three year requirement (i.e. be a first-time homebuyer) to be eligible for THDA's loan programs. A current, active member of the military in the first tour of duty is not eligible for this exemption.

funds for the program. The table below shows the distribution of eligible activity type across Tennessee’s three Grand Divisions. Units receiving ERP funds are eligible for more than one activity.

Table 7
Repair Activities by Grand Division
Emergency Repair Program

Activity Type	East	Middle	West	Total
Roofing	15	29	31	75
Plumbing	18	13	1	32
Electrical	20	1	2	23
HVAC	22	23	11	56
Other	69	53	20	142

M. Rural Repair

The THDA Rural Repair Program continued its partnership with the Rural Housing Service (RHS) of the U.S. Department of Agriculture. The program provides funds for the repair of homes of low-income people. The THDA grant is restricted to 50 percent of the RHS approved repair costs and cannot exceed \$7,500 per household for elderly or disabled homeowners. For non-elderly, non-disabled homeowners, the THDA grant is restricted to 30 percent of the RHS approved repair costs and cannot exceed \$5,000 per household. A grant/loan combination is made if the applicant can repay part of the cost and total cannot exceed \$27,500. During the FY 2014-15, THDA provided \$801,850, contributing to 151 grants/loans.

Summary

The State of Tennessee expended a total of \$579,955,395 for community development and affordable housing programs during FY 2014-15. Of this total, \$50,354,171 was federal funds provided by HUD through the consolidated planning process. An additional \$529,601,224 was made available through other affordable housing programs.

Table 8
Summary of Investments, FY 2014-15
All Programs

Program	Funds Awarded/Granted/Loaned
<i>Consolidated Plan Grant Programs:</i>	
Community Development Block Grant (CDBG)	\$29,369,086
HOME Investment Partnership (HOME)	\$16,683,138
Emergency Solutions Grants (ESG)	\$3,362,892
Housing Opportunities for Persons with AIDS (HOPWA)	\$939,055
<i>Subtotal of HUD Resources Invested</i>	<i>\$50,354,171</i>
<i>Other Resources Made Available:</i>	
Section 8 Tenant Based Rental Assistance	\$33,167,742
Section 8 Project Based Rental Assistance	\$157,686,804
Low Income Housing Tax Credit ⁷	\$16,518,809
Multifamily Bond Authority	\$25,100,000
THDA Homeownership Programs	\$239,995,354
BUILD Loan Program	\$0
CITC	\$54,027,643
Emergency Repair Program ⁸	\$2,303,022
Rural Repair	\$801,850
<i>Subtotal of Other Resources Made Available</i>	<i>\$529,601,224</i>
Grand Total	\$579,955,395

⁷ Includes non-competitive and competitive credits.

⁸ Includes match funds provided by THDA.

III. GEOGRAPHIC DISTRIBUTION AND LOCATION OF INVESTMENTS

HUD Resources Made Available Under the Consolidated Planning Programs

A. Community Development Block Grant (CDBG) Small Cities Program

Each year, ECD prepares the state’s Performance and Evaluation (PER) for the CDBG Program (Appendix A). The following table, derived from information contained in the PER, summarizes the location of CDBG subrecipients and their funding amounts by grand division. Of the total funding awarded, 47 percent was awarded in East Tennessee, 32 percent in Middle Tennessee and 21 percent in West Tennessee. An expanded version of this table is presented in Appendix A.

Table 9
Funding by Grand Division
CDBG Program

Grand Division	Number of Grantees	Total Funds	Percent of Total Funds
East	34	\$13,907,105	47%
Middle	27	\$9,344,192	32%
West	21	\$6,117,789	21%
Total	82	\$29,369,086	100%

B. HOME Investment Partnership

During the reporting period, THDA awarded HOME funds to 59 grantees proposing to construct or improve 452 affordable housing units across Tennessee’s three grand divisions. The majority of grantees and funds were made available to Middle Tennessee, followed by East and West Tennessee. Funds were also made available across the three funding categories (CHDO, Supportive Housing and Urban/Rural).

Table 10
Distribution of Funds by Grand Division
HOME Program

Grand Division	Funding Category	Number of Grantees	Total Awards
East	CHDO	3	\$1,062,200
	Supportive Housing	3	\$499,914
	Urban/Rural	13	\$3,998,672
	<i>East Division Total</i>	<i>19</i>	<i>\$5,560,786</i>
Middle	CHDO	1	\$198,024
	Supportive Housing	1	\$470,000
	Urban/Rural	28	\$7,228,380
	<i>Middle Division Total</i>	<i>30</i>	<i>\$7,896,404</i>
West	CHDO	1	\$170,948
	Supportive Housing	0	\$0
	Urban/Rural	9	\$3,055,000
	<i>West Division Total</i>	<i>10</i>	<i>\$3,225,949</i>
Total	All Grand Divisions	59	\$16,683,138

HOME funds were made available across the three funding categories: CHDO, Supportive Housing and Urban/Rural. The Urban/Rural allocation during FY 2014-15 was \$14,282,052, Supportive Housing was \$969,914 and the total award to CHDO's was \$1,431,172. The table below shows the funds made available to each category and the type of eligible activities proposed within the three funding categories.

Table 11
Funding Categories and Proposed Activities
HOME Program

Funding Category	Activities Proposed	Total Award
CHDO	Homeowner and Rental New Construction, Rental Acquisition and Rehabilitation	\$1,431,172
Supportive Housing	Rental Acquisition and Rehabilitation	\$969,914
Urban/Rural	Down Payment Assistance, Homeowner Rehabilitation	\$14,282,052
Total	452 Units	\$16,683,138

C. Emergency Solutions Grants (ESG)

During the reporting period, there were 47 contracts awarded for the ESG Program. Of these, 21 were located in East Tennessee; 15 were in Middle Tennessee, and 11 in the West Tennessee Region. Of the total amount of ESG funds, approximately 43 percent were awarded in East Tennessee, 36 percent were in Middle Tennessee and 21 percent in West Tennessee. Table 12 shows amounts and location of awards.

Table 12
Subrecipients and Funds by Grand Division
ESG Program

Emergency Solutions Grants Grantee	GD	Total Program Funding
AIM Center, Inc. (2013 funds)	E	\$14,285.00
Appalachian Regional Coalition on Homelessness (2013 funds – *remainder of Friends and Neighbors contract)	E	\$ 61,722.50
Appalachian Regional Coalition on Homelessness (2014 funds)	E	\$100,000.00
City of Bristol (2013 funds)	E	\$53,564.00
Change Is Possible (2013 funds)	E	\$75,000.00
City of Cleveland (2013 funds)	E	\$86,773.00
Family Promise of Blount County (2013 funds)	E	\$68,061.00
Family Promise of Greater Johnson City (2013 funds)	E	\$69,500.00
Friends and Neighbors* (2013 funds)	E	\$3,277.50
Frontier Health (2013 funds)	E	\$14,286.00
Good Samaritan Ministries (2013 funds)	E	\$75,000.00
City of Johnson City (2013 funds)	E	\$130,695.00
Johnson County Safe Haven (2013 funds)	E	\$60,000.00
City of Knoxville (2014 funds)	E	\$130,308.00
City of Kingsport (2013 funds)	E	\$94,272.00
City of Morristown (2013 funds)**	E	\$45,693.00
City of Oak Ridge (2013 funds)	E	\$52,492.00
Ridgeview Psychiatric (2013 funds)	E	\$14,285.00
Scott County Homeless Shelter (2013 funds)	E	\$64,675.00
Scott County Homeless Shelter (2014 funds)	E	\$63,393.00

TN Valley Coalition to End Homelessness (2014 funds)	E	\$100,000.00
East Total		\$1,377,282.00
Buffalo Valley (2013 funds)	M	\$75,000.00
Buffalo Valley (2014 funds)	M	\$100,000.00
Centerstone CMHC (2013 funds)	M	\$14,286.00
City of Clarksville (2013 funds)	M	\$164,976.00
Doors of Hope (2014 funds)	M	\$73,500.00
Families in Crisis (2013 funds)	M	\$50,000.00
Families in Crisis (2014 funds)	M	\$40,000.00
City of Franklin (2013 funds)	M	\$54,635.00
City of Hendersonville (2013 funds)	M	\$56,777.00
Crossville Housing Development Corporation (2014 funds)	M	\$100,000.00
Good Neighbor Mission (2013 funds)	M	\$75,000.00
Good Neighbor Mission (2014 funds)	M	\$69,616.00
Monroe Harding (2014 funds)	M	\$36,615.00
City of Murfreesboro (2013 funds)	M	\$178,902.00
Oasis Center (2014 funds)	M	\$63,385.00
Park Center (2013 funds)	M	\$14,286.00
Middle Total		\$1,166,978.00
Area relief Ministries (2014 funds)	W	\$80,000.00
BHI, Inc. (2013 funds)	W	\$14,286.00
Carey Counseling (2013 funds)	W	\$14,286.00
Damascus Road (2013 funds)	W	\$75,000.00
Fayette Cares (2013 funds)	W	\$75,000.00

City of Jackson (2013 funds)	W	\$137,123.00
Matthew 25:40 (2013 funds)	W	\$75,000.00
Matthew 25:40 (2014 funds)	W	\$60,000.00
TN Homeless Solutions (2013 funds)	W	\$50,000.00
TN Homeless Solutions (2014 funds)	W	\$37,082.00
Wo/Men's Resource and Rape Assistance Program (2013 funds)	W	\$52,000.00
West Total		\$669,777.00
Total State Admin		\$148,855.00
GRAND TOTAL		\$3,362,892.00

**Friend and Neighbors voluntarily terminated their contract in order to transfer the remaining funds to the lead agency of the CoC, ARCH.*

***The City of Morristown took a voluntary cut in their allocation.*

D. Housing Opportunities for Persons with AIDS (HOPWA)

The Tennessee Department of Health provided \$910,900.00 to seven project sponsors covering 79 of Tennessee's 95 counties. The funds were distributed to each of Tennessee's Grand Divisions in the following way: 63 percent went to East Tennessee, 22 percent went to Middle Tennessee and 15 percent of the funds went to West Tennessee. The table below shows the distribution of HOPWA program funds across Tennessee's three Grand Divisions.

Table 13
Funds Awarded by Grand Division
HOPWA Program

Project Sponsor	Grand Division	Funds Awarded
Chattanooga CARES	East	\$212,600.00
East Tennessee Human Resource Agency	East	\$271,200.00
Frontier Health	East	\$91,100.00
East Tennessee Total	East	\$574,900.00
Columbia CARES	Middle	\$82,000.00
Nashville CARES	Middle	\$54,200.00
Upper Cumberland Human Resource Agency	Middle	\$63,200.00
Middle Tennessee Total	Middle	\$199,400.00
West Tennessee Legal Services	West	\$136,600.00
West Tennessee Total	West	\$136,600.00
Total State Funding		\$910,900.00
Total Admin		\$28,155.00
PROGRAM TOTAL		\$939,055.00

Formula Distribution Method: Total of Region (ex. East TN) divided by Program Total = Regional Percentages %, Total of State Funding = All 3 Regions, Total Admin adjusted due to rounding not to exceed 3% of program total and Total State Funding + Total Admin = Program total

Other Resources Made Available

E. HUD Section 8 Tenant Based Housing Choice Voucher Program

During the reporting period, \$33,167,741 was made available for the Section 8 Tenant Based Housing Choice Voucher program. The table below shows the breakdown of Section 8 Tenant Based funds available by Grand Division.

Table 14
Funds by Grand Division
Section 8 Tenant Based Housing Choice Voucher Program

Grand Division	Funds Available	Percent of Total Funds Available
East Tennessee	\$3,814,290.22	11.5%
Middle Tennessee	\$23,847,605.78	71.9%
West Tennessee	\$5,505,845.01	16.6%
Total	\$33,167,741	100%

F. HUD Section 8 Project Based Rental Assistance

THDA's Contract Administration Division has responsibility for the administration of Section 8 Project Based contracts throughout the state. At the end of FY 2014-15, the division reported 28,976 units under contract with 37 percent in East Tennessee, 32 percent in Middle Tennessee and 31 percent in West Tennessee. The table below shows how many units are located in each Grand Division.

Table 15
Contract Units by Grand Division
Section 8 Project Based Rental Assistance

East Tennessee	Contract Units
Anderson	551
Bledsoe	560
Blount	285
Bradley	315
Campbell	25
Carter	107
Claiborne	1382
Cocke	227
Cumberland	3010
Grainger	94
Greene	786
Hamblen	0
Hamilton	743
Hancock	107
Hawkins	0
Jefferson	30
Johnson	75
Knox	0
Loudon	0
Marion	46
McMinn	202
Meigs	159
Monroe	99
Morgan	0
Polk	249
Roane	48
Scott	48
Sevier	39
Sullivan	24
Unicoi	190
Washington	110
East Total	10,621

Middle Tennessee	Contract Units
Bedford	119
Coffee	142
Davidson	284
DeKalb	50
Dickson	32
Franklin	249
Giles	306
Grundy	23
Hickman	24
Humphreys	0
Lewis	102
Lincoln	86
Marshall	124
Maury	0
Montgomery	152
Overton	183
Perry	0
Pickett	36
Putnam	53
Robertson	330
Rutherford	22
Sequatchie	22
Stewart	864
Sumner	50
Van Buren	417
Warren	0
White	25
Williamson	0
Wilson	123
Middle Total	9,293

West Tennessee	Contract Units
Benton	255
Carroll	63
Chester	212
Crockett	123
Decatur	60
Dyer	76
Fayette	36
Gibson	294
Hardeman	0
Hardin	0
Haywood	415
Henderson	5099
Henry	71
Lake	94
Lauderdale	0
Madison	0
McNairy	135
Obion	15
Shelby	50
Tipton	50
Weakley	307
West Total	9,062

**Summary of Units by
Grand Division**

Division	Units
East TN	10,621
Middle TN	9,293
West TN	9,062
Total	28,976

G. Low Income Housing Tax Credit

Low Income Housing Tax Credits are allocated on a calendar year basis. During the 2014 reporting period, twelve Tennessee counties received tax credits, creating a total of 2,611 units of affordable housing. Geographically, nine allocations in five different counties were made in East Tennessee. In Middle Tennessee, ten allocations were made in five counties, and in West Tennessee, eight allocations were made in three counties. The grand divisions, counties and number of affordable housing units for 2014 are represented in the following table.

Table 16
2014 Allocations
Low Income Housing Tax Credit (LIHTC) Program

Grand Division	County	Units	Allocation
East	Bradley	198	\$2,027,909
	Claiborne	56	\$578,693
	Hamblen	242	\$2,687,965
	Knox	400	\$1,063,646
	Macon	60	\$650,000
	<i>East Division Subtotal</i>	<i>956</i>	<i>\$7,008,213</i>
Middle	Macon	57	\$3,736,010
	Perry	56	\$5,770,280
	Putnam	312	\$30,910,290
	Rutherford	130	\$2,999,210
	Williamson	64	\$10,998,900
	<i>Middle Division Subtotal</i>	<i>1,034</i>	<i>\$6,740,072</i>
West	Hardeman	113	\$1,072,754
	Obion	218	\$1,943,963
	Shelby	250	\$1,052,410
	<i>West Division Subtotal</i>	<i>621</i>	<i>\$4,668,176</i>
Grant Total		2611	\$16,518,809

H. Multifamily Bond Authority

In CY 2014, tax-exempt bond authority was allocated to provide permanent financing for a total of four developments, which will result in 580 units of affordable housing with a total allocation of \$25,075,000. While the bond authority is not reflected in the previous table (Table 16), the 580 units are represented, as they also received a LIHTC allocation. Table 17 shows the distribution and total allocations by county and grand division.

Table 17
2014 Allocations
Multifamily Bond Authority Program

Grand Division	County	Allocation
East	Knox	\$15,000,000
	<i>Eastern Division Subtotal</i>	<i>\$15,000,000</i>
Middle	Rutherford	\$7,250,000
	<i>Middle Division Subtotal</i>	<i>\$7,250,000</i>
West	Shelby	\$2,825,000
	<i>West Division Subtotal</i>	<i>\$2,825,000</i>
Grant Total		\$25,075,000

I. THDA Homeownership Programs

Homeownership loans were made in 70 of Tennessee’s 95 counties. The greatest number of loans was made in Middle Tennessee, followed by East Tennessee and West Tennessee. The breakdown of loans by Grand Division is show in Table 18.

Table 18
Homeownership Loans by Grand Division
THDA Homeownership Programs

Grand Division	Number of Loans	Percent of All Loans	Total Dollar Value of Loans
East	612	30%	\$62,724,618
Middle	1,103	54%	\$143,810,287
West	313	15%	\$33,460,449
Total	2,028	100%	\$239,995,354

J. BUILD Loan Program

The THDA BUILD Loan Program is meant to build the capacity of nonprofit organizations to provide affordable housing to low-income Tennesseans. The loan program supports the production of affordable housing by providing low interest, short term loans to eligible nonprofit organizations. BUILD loan funds may be used for new construction or rehabilitation of units for homeownership or rental housing, land acquisition, pre-development activities, and site preparation. THDA did not engage in any BUILD activities during the reporting period.

K. Community Investment Tax Credit

THDA administers the Community Investment Tax Credit (CITC) in cooperation with the Tennessee Department of Revenue. CITC allows financial institutions to obtain a credit against the sum total of taxes imposed by the Franchise and Excise Tax Laws when qualified loans, investments, grants or contributions are extended to eligible housing entities for engaging in eligible low-income housing activities. During FY 2014-15, THDA and the Tennessee Department of Revenue, awarded credits through CITC for 67 different affordable housing projects with a total investment amount of \$54,027,643. The geographic distribution of the 67 projects was as follows: 24 in East Tennessee, 25 in Middle Tennessee and 18 in West Tennessee.

Table 19
Program Funds by Grand Division
Community Investment Tax Credit (CITC) Program

Grand Division	Total Investment	Percent of Total Investment
East Tennessee	\$14,937,739	28%
Middle Tennessee	\$33,000,009	61%
West Tennessee	\$6,089,894	11%
Total	\$54,027,643	100%

L. Emergency Repair Program

During the reporting period, eight of the nine Development Districts and one Human Resource Agency that administer the Emergency Repair Program across the state spent a total of \$2,303,022 to correct, repair or replace an essential system and/or critical structural problem for low-income, elderly homeowners. Of this total, \$1,310,770 was provided by THDA and \$864,048 in match funds was provided by the Development Districts. An additional \$128,203 was provided to the Development Districts by THDA for administration of ERP. Middle Tennessee received 41 percent of the program funds, followed by East Tennessee with 36 percent and West Tennessee with 23 percent.

Table 20
Program Funds by Grand Division
Emergency Repair Program

East Tennessee	Funds Expended
Bradley	\$26719
Cumberland	\$36624
Carter	\$17289
Greene	\$4600
Hamblen	\$18653
Hamilton	\$46677
Hancock	\$3145
Marion	\$61460
Jefferson	\$16034
Loudon	\$35454
Knox	\$325462
McMinn	\$57842
Sullivan	\$94328
Morgan	\$10040
Scott	\$24219
Sevier	\$8416
Washington	\$5908
Grand Total	\$792870

Middle Tennessee	Funds Expended
Bedford	\$17500
Clay	\$38611
Coffee	\$27048
Davidson	\$163834
Dekalb	\$13688
Fentress	\$15580
Giles	\$56202
Franklin	\$9160
Grundy	\$31343
Hickman	\$23000
Jackson	\$8400
Lawrence	\$22700
Lewis	\$4300
Lincoln	\$16250
Marshall	\$16360
Maury	\$74460
Montgomery	\$13147
Overton	\$27925
Perry	\$8900
Putnam	\$73499
Robertson	\$34345
Smith	\$8114
Sumner	\$20533
Van Buren	\$17500
Warren	\$15000
White	\$24655
Williamson	\$82529
Wilson	\$25667
Grand Total	\$890249

West Tennessee	Funds Expended
Henry	\$55826
Crockett	\$7472
Benton	\$21653
Carroll	\$37994
Dyer	\$19012
Henderson	\$1200
Hardeman	\$4030
Gibson	\$201562
Lake	\$10430
Lauderdale	\$15931
Obion	\$34192
Shelby	\$15250
Tipton	\$22520
Weakley	\$44629
Grand Total	\$491700

Summary of Units By Grand Division	
Division	Funds
East TN	\$792870
Middle TN	\$890249
West TN	\$491700
Total	\$2,174,819

M. Rural Repair

The THDA Rural Repair Program is a partnership with the Rural Housing Service (RHS) of the US Department of Agriculture (USDA) to provide grants and loans for the repair of homes of low-income persons. The following table presents THDA's contributions by county and Grand Division during FY 2014-15.

Table 21
THDA Contribution by County and Grand Division
Rural Repair Program

East TN	# Loans	Total \$
Blount	1	\$1,797
Campbell	4	\$21,447
Carter	2	\$11,908
Cocke	2	\$14,662
Cumberland	2	\$14,387
Grainger	4	\$14,257
Greene	4	\$19,749
Hamblen	2	\$9,592
Hancock	2	\$8,702
Hawkins	3	\$11,274
Jefferson	3	\$12,657
Johnson	1	\$3,990
Marion	3	\$15,312
McMinn	3	\$9,578
Meigs	1	\$7,500
Polk	2	\$13,616
Rhea	2	\$14,647
Roane	1	\$4,160
Sevier	1	\$4,985
Union	2	\$11,422
Washington	5	\$19,206
East Total	50	\$244,848

Middle TN	# Loans	Total \$
Cheatham	3	\$12,406
Clay	2	\$13,475
Coffee	2	\$5,903
Davidson	1	\$3,750
DeKalb	3	\$22,490
Franklin	1	\$3,586
Grundy	2	\$14,625
Hickman	1	\$2,050
Jackson	1	\$7,357
Lawrence	1	\$4,662
Lincoln	1	\$7,500
Marshall	3	\$15,584
Mauzy	1	\$5,355
Overton	6	\$35,162
Putnam	2	\$12,337
Rutherford	1	\$1,900
Warren	1	\$7,500
Wilson	1	\$3,250
Middle Total	33	\$178,892

West TN	# Loans	Total \$
Benton	2	\$13,323
Carroll	3	\$13,800
Chester	1	\$3,846
Crockett	2	\$10,150
Decatur	1	\$3,914
Dyer	1	\$7,500
Fayette	5	\$32,704
Gibson	18	\$79,181
Hardeman	2	\$15,000
Hardin	3	\$20,894
Haywood	5	\$36,312
Henderson	1	\$5,599
Henry	1	\$3,893
Lauderdale	1	\$7,500
Madison	10	\$63,340
McNairy	3	\$19,825
Obion	1	\$1,793
Tipton	3	\$15,741
Weakley	5	\$23,795
West Total	68	\$378,110

Summary by Grand Division		
East TN	50	\$244,848
Middle TN	33	\$178,892
West TN	68	\$378,110
Total	151	\$801,850

Summary

During FY 2014-15, Middle Tennessee received the largest portion of funds, due in large part to the Section 8 Tenant Based Rental Assistance, CITC and THDA Homeownership Programs. In regards to the four Consolidated Plan Grant Programs, East Tennessee received 43 percent of the funds, Middle Tennessee received 37 percent of the funds and West Tennessee received 20 percent of the total funds available. The geographic break-outs of the Housing Assistance Payments for the Section 8 Contract Administration Program were not available at the time of this report.

Table 22
Summary of Geographic Distribution
All Programs

Consolidated Plan Grant Programs:	East	Middle	West	Total
Community Development Block Grant	\$13,907,105	\$9,344,192	\$6,117,789	\$29,369,086
HOME Investment Partnership	\$5,560,786	\$7,896,404	\$3,225,948	\$16,683,138
Emergency Solutions Grants	\$1,377,282	\$1,166,978	\$669,777	\$3,214,037
HOPWA ⁹	\$574,900	\$199,400	\$136,600	\$910,900
Subtotal of HUD Resources Available	\$21,420,073	\$18,606,974	\$10,150,114	\$50,177,161
Other Resources Made Available:	East	Middle	West	Total
Section 8 Tenant Based Rental Assistance	\$3,814,290	\$23,847,606	\$5,505,845	\$33,167,741
Section 8 Contract Administration	Not available	Not available	Not available	\$0
Low Income Housing Tax Credit	\$7,008,213	\$6,740,072	\$4,668,176	\$18,416,461
Multifamily Bond Authority	\$15,000,000	\$7,250,000	\$2,825,000	\$25,075,000
THDA Homeownership Programs	\$62,724,618	\$143,810,287	\$33,460,449	\$239,995,354
BUILD Loan Program	\$0	\$0	\$0	\$0
CITC	\$14,937,739	\$33,000,009	\$6,089,894	\$54,027,642
Emergency Repair Program	\$792,870	\$890,249	\$491,700	\$2,174,819
Rural Repair	\$244,848	\$178,892	\$378,110	\$801,850
Subtotal of Other Resources Available	\$104,522,578	\$215,717,115	\$53,419,174	\$373,658,867
Grand Total	\$125,942,651	\$234,324,089	\$63,569,288	\$423,836,028

⁹ Total does not reflect State Administrative funds.

IV. FAMILIES AND PERSONS ASSISTED

HUD Resources Made Available Under the Consolidated Planning Programs

A. Community Development Block Grant (CDBG) Small Cities Program

The following table summarizes data from the 2014 PER Part III: Civil Rights, which reports the CDBG regular round awardees and beneficiaries by race and gender (Appendix A). For the reporting period, the total beneficiaries for the reporting period are 248,741 persons. Of this total, 22,730 are minorities and 106 are female heads of household.

**Table 23
Program Demographics
CDBG Program**

Race	Total Served	Percent of Total Served
White	226,011	90.86%
Black/African American	17,628	7.09%
Asian	836	0.34%
American Indian/Alaskan Native	199	0.08%
Native Hawaiian/Pacific Islander	85	0.03%
American Indian/Alaskan Native and White	162	0.07%
Asian and White	219	0.09%
Black/African American and White	299	0.12%
American Indian/Alaskan Native & Black/African American	564	0.23%
Other Multi-Racial	2,738	1.10%
Total	248,741	100%

Information on the benefit to low- and moderate-income (LMI) persons is also reported in the PER. The following table presents a summary of the information derived from CDBG contract closeouts. An expanded table is presented in Appendix A. Based on the information, 248,741 persons are reported as beneficiaries. Of the total beneficiaries, 181,245 or 73 percent are low- and moderate-income persons.

**Table 24
Benefit to Low and Moderate Income Persons
CDBG Program**

Activities	Total Persons Assisted	Total LMI Persons Assisted	Percent of Persons Assisted who are LMI
CDBG	248,741	181,245	73%

B. HOME Investment Partnership

Beneficiary information is obtained for the HOME Program after a project completion report is entered into IDIS and a beneficiary report is obtained from HUD. This year's beneficiary report shows that 87 units were completed with HOME funds during FY 2014-15. The units completed during FY 2014-15 were assisted with HOME funds allocations dating back from program year 2012. Middle Tennessee assisted 13 units, followed by East Tennessee with 69 units and West Tennessee with 5 units.

Very low-income households are those households whose annual income is below 50 percent or less of the area median income (AMI) for the county in which the household resides. Low-income households are those households whose annual income is between 50 percent and 80 percent of the AMI for the county in which the household resides. Out of the 87 households assisted during the reporting period, 66 percent were considered very low-income, 33 percent were considered low-income and one percent of the units were missing beneficiary data at the time of this report. The income of beneficiaries, organized by Grand Division, is shown in the table below.

Table 25
Household Income of Beneficiaries
HOME Program

Percent of AMI	Number of Beneficiaries				Percent of Total
	East Tennessee	Middle Tennessee	West Tennessee	Total	
0 – 50%	44	10	3	57	66%
51 – 80%	25	2	2	29	33%
Not Available	-	1	-	1	1%
Total	69	13	5	87	100%

A more detailed breakdown of HOME Beneficiaries receiving assistance during the reporting period by income and Grand Division is provided in the following table.

Table 26
Income Characteristics of Beneficiaries
HOME Program

Percent of AMI	Number of Beneficiaries				Percent of Total
	East Tennessee	Middle Tennessee	West Tennessee	Total	
0 – 30 %	9	3	-	12	14%
31 – 50%	35	7	3	45	52%
51 – 60%	20	2	1	23	26%
61 – 80%	5	0	1	6	7%
Not Available	0	1	-	1	1%
Total	69	13	5	87	100%

Renter-occupied units comprised the majority of HOME assisted units during the reporting period, followed by owner-occupied units. Of the 87 total HOME assisted units, 42 units were owner occupied-units (48 percent). 44 units (51 percent) were renter-occupied and one unit (one percent) was vacant at the time of this report.

Out of the 87 units assisted during the reporting period, 60 units (69 percent) were rehabilitation projects. New construction followed with 12 units (14 percent), acquisition only with nine units (10 percent), then acquisition and rehabilitation with six units (seven percent). There were no acquisition and new construction projects during this reporting period.

During the reporting period, 86 of the 87 units were occupied. In total, 81 percent of HOME beneficiaries were white and 18 percent were minorities. There were no beneficiaries of Hispanic origin. The tables below describe race and ethnicity information.

Table 27
Race/Ethnicity Characteristics of Beneficiaries
HOME Program

Race	East Tennessee	Middle Tennessee	West Tennessee	Total	Percent of Total
White	63	7	0	70	81%
Black/African American	5	5	5	15	17%
Other/Multi-Racial	1	0	0	1	1%
Not Available (Vacant)	-	1	-	1	1%
Total	69	13	5	87	100%

Ethnicity	East Tennessee	Middle Tennessee	West Tennessee	Total	Percent of Total
Hispanic	-	-	-	0	0%
Non-Hispanic	69	13	5	87	100%
Total	69	13	5	87	100%

The size of families assisted with HOME funds during the reporting period ranged from one person to seven persons. Elderly heads of household were most frequently served, followed by single, non-elderly heads of household. Details of the size and type of household is provided in Table 28.

Table 28
Size and Type of Household
HOME Program

Household Size	Single, Non-Elderly	Elderly	Related/Single Parent	Related/Two Parent	Other	Not Available	Total
1	25	21	-	-	-	-	46
2	4	8	5	-	1	-	18
3	2	2	5	1	1	-	11
4	2	2	2	1	-	-	7
5	-	-	-	2	-	-	2
6	-	1	-	-	-	-	1
7	-	-	1	-	-	-	1
N/A	-	-	-	-	-	1	1
Total	33	34	13	4	2	1	87

C. Emergency Solutions Grants (ESG)

Demographic information for the ESG Program has been summarized in the following tables. More detailed demographic information regarding ESG beneficiaries served may be found in Appendix C of this document. Middle Tennessee served 50 percent of the total beneficiaries during the reporting period, followed by East with 42 percent of total beneficiaries and West Tennessee with the remaining eight percent. White beneficiaries were served most frequently with ESG funds and comprised approximately 70 percent of the total clients served. Black/African American followed with 23 percent of the beneficiaries. The table below shows the number of individuals served by race for each Grand Division.

Table 29
Beneficiaries by Race
ESG Funds

Race	East Tennessee	Middle Tennessee	West Tennessee	Total
White	6,033	5,218	787	12,038
Black/African American	744	2,580	530	3,854
Black/African American & White	97	133	75	305
Native Hawaiian/Pacific Islander	4	37	0	41
Asian	8	47	0	55
Asian/White	2	21	0	23
American Indian/Alaskan Native	36	17	3	56
American Indian/Alaskan Native/White	9	20	2	31
American Indian/Alaskan Native/Black	4	4	0	8
Other/Multi Racial	225	445	14	684
Total	7,162	8,522	1,411	17,095

Of the total beneficiaries served with ESG funds, 52.6 percent were female and 46.7 percent were male. For less than one percent of the total beneficiaries, the gender information was unavailable. The table below shows the gender of beneficiaries by Grand Division.

Table 30
Beneficiaries by Gender
ESG Funds

Gender	East Tennessee	Middle Tennessee	West Tennessee	Total
Female	3,686	4,674	633	8,993
Male	3,377	3,847	751	7,975
Unavailable	99	1	27	127
Total	7,162	8,522	1,411	17,095

During this reporting period, 80 percent of the total beneficiaries served with ESG funds earn between zero and 30 percent of the Area Median Income (AMI). Eight percent earned between 30 and 60 percent of the AMI and one percent earned between 60 and 80 percent of the AMI. For 10 percent of ESG beneficiaries, income information was unavailable. The table below shows the income category of ESG beneficiaries by Grand Division. It is important to note that domestic violence victims are served regardless of income and are included in the total count of beneficiaries.

Table 31
Income of Beneficiaries
ESG Funds

Income	East Tennessee	Middle Tennessee	West Tennessee	Total
0 – 30% of AMI	5865	6884	959	13708
30 – 60% of AMI	312	990	110	1412
60 – 80% of AMI	132	99	3	234
Unavailable	853	549	339	1741
Total Households	7162	8522	1411	17095

D. Housing Opportunities for Persons with AIDS (HOPWA)

During the reporting period, the HOPWA program reported activity for 441 individuals with HIV/AIDS and 306 affected family members as beneficiaries of HOPWA services. A total of 441 beneficiaries were served. Of those beneficiaries, 65 percent were male, 35 percent were female and there were no transgender. The race, ethnicity and income of HOPWA beneficiaries are presented below.

Table 32
Race and Ethnicity of Beneficiaries
HOPWA Program

Race	Number of Beneficiaries	Percent of Beneficiaries
American Indian/Alaskan Native	1	.2 %
Asian	0	0 %
Black/African American	149	34 %
Native Hawaiian/Other Pacific Islander	0	0 %
White	287	65 %
American Indian/Alaskan Native & White	2	.45 %
Asian & White	0	0 %
Black/African American & White	2	.45 %
American Indian/Alaskan Native & Black/African American	0	0 %
Other Multi-Racial	0	0 %
Total	441	100%
Hispanic	16	3.6 %

Table 33
Income of Beneficiaries
HOPWA Program

Income	Number of Households	Percent of Households
0 – 30% of AMI	312	71 %
30 – 60% of AMI	99	22 %
60 – 80% of AMI	30	7 %
Total	441	100%

Other Resources Made Available

E. HUD Section 8 Tenant Based Housing Choice Voucher Program

THDA manages the Section 8 Tenant Based Rental Assistance Program. The following tables represent basic demographic data based on the 6,700 heads of household participating in the program. Out of the 6,700 households, 64 percent were families with dependents and 13 percent were elderly. Ninety percent of the households had a female head of household. Information on income and race/ethnicity is presented below.

Table 34
Select Demographic Data
Section 8 Tenant Based Housing Choice Voucher Program

Annual Household Income	Number of Participant Households	Percent of Total Participant Households
\$0	11	0%
\$1 – \$5,000	245	4%
\$5,001 – \$10,000	1630	24%
\$10,001 – \$15,000	1934	29%
\$15,001 – \$20,000	1145	17%
\$20,001 – \$25,000	810	12%
Above \$25,000	925	14%
Total	6700	100%

Sources of Household Income*	Number of Participant Households	Percent of Total Participant Households
Any wages	2324	35%
TANF	838	13%
SS/SSI	2021	30%
Child Support	1792	27%
Other Income	6164	92%
*Household may have more than one source of income		

Race	Number of Participant Households	Percent of Total Participant Households
White	2,488	37.13%
Black/African American	4,186	62.48%
Asian	9	0.13%
Native Hawaiian/Other Pacific Islander	8	0.12%
American Indian/Alaska Native	9	0.13%
Total	6700	100%

Ethnicity	Number of Participant Households	Percent of Total Participant Households
Hispanic	125	1.87%
Non-Hispanic	6575	98.13%
Total	6700	100%

F. HUD Section 8 Contract Administration Program

THDA also manages the Section 8 Project Based Rental Assistance program. The table below provides point in time demographic information regarding the tenants who occupy the Section 8 units. There are a total of 48,639 family and non-family members in the 28,976 units.

Table 35
Tenant Characteristics
Section 8 Project Based Rental Assistance

Section 8 Project Based Participants	East	Middle	West	Total
<i>Race</i>				
White	12662	8451	3496	24609
Black	3426	6620	13269	23315
Asian	27	104	30	161
American Indian Or Alaska Native	106	61	40	207
Native Hawaiian Or Other Pacific Islander	7	13	11	31
Unknown	-	-	-	-
Total Residents				
<i>Ethnicity</i>				
Hispanic	26	19	14	59

Table 36
Head of Household Characteristics
Section 8 Project Based Rental Assistance

Section 8 Project Based Participants	East	Middle	West	Total
<i>Income Category</i>				
0% – 30% of AMI	9546	8234	8191	25971
31% – 50% of AMI	898	881	733	2512
51% – 80% of AMI	35	35	33	103
Total Head of Households	10479	9150	8957	28586
<i>Age</i>				
62 and older (as of 6/30/2015)	3905	3915	3283	11103
<i>Disability</i>				
Mobility, Hearing, or Visually Impaired	211	247	181	639

G. Low Income Housing Tax Credit

During FY 2014-15, 39,143 households benefitted from Low Income Housing Tax Credits (LIHTC). Of those households, 41 percent lived in Middle Tennessee, 31 percent in East Tennessee, and 28 percent in West Tennessee. The state’s most populous counties, Shelby and Davidson, had the highest number of households living in LIHTC properties.

Table 37
Units Assisted by County and Grand Division
LIHTC

East Tennessee	Contract Units
Anderson	493
Bledsoe	23
Blount	210
Bradley	706
Campbell	117
Carter	274
Claiborne	41
Cocke	218
Cumberland	245
Grainger	60
Greene	253
Hamblen	195
Hamilton	1980
Hancock	41
Hawkins	161
Jefferson	82
Johnson	40
Knox	3314
Loudon	204
Macon	47
Marion	38
McMinn	258
Monroe	110
Morgan	46
Polk	43
Rhea	61
Roane	190
Scott	20
Sevier	362
Sullivan	1297
Unicoi	58
Union	68
Washington	861
Grand Total	12117

Middle Tennessee	Contract Units
Bedford	304
Cannon	40
Cheatham	94
Clay	56
Coffee	342
Davidson	7771
DeKalb	62
Dickson	495
Fentress	156
Franklin	132
Giles	136
Grundy	75
Hickman	25
Humphreys	41
Jackson	44
Lawrence	86
Lewis	47
Lincoln	216
Macon	48
Marshall	95
Maury	419
Monroe	43
Montgomery	881
Moore	33
Overton	40
Putnam	257
Robertson	335
Rutherford	1186
Sequatchie	64
Smith	72
Sumner	750
Van Buren	30
Warren	212
Wayne	132
White	94
Williamson	279
Wilson	828
Grand Total	15921

West Tennessee	Contract Units
Benton	38
Carroll	67
Chester	44
Crockett	31
Davidson	83
Decatur	48
Dyer	106
Fayette	155
Gibson	102
Hardin	141
Haywood	201
Henderson	69
Henry	229
Lake	100
Lauderdale	181
Madison	1123
McNairy	56
Obion	97
Shelby	7794
Tipton	313
Weakley	124
Grand Total	11105

Summary of Units	
By Grand Division	
Division	Units
East TN	12117
Middle TN	15921
West TN	11105
Total	39143

Of the total beneficiaries of the LIHTC program, 45.5 percent identified as Black or African American, while 37 percent identified as White. In total, 1.3 percent of the beneficiaries are of Hispanic or Latino origin. The table below details the demographic characteristics of the beneficiaries. Note that this data was collected from HUD LIHTC beneficiary information which does not have female/male designations. The raw LIHTC data with gender designations was not available during the preparation of this report.

Table 38
Demographics of Participants
Low Income Housing Tax Credit (LIHTC)

Race	Number of Tenants	Percent of Tenants
American Indian/Alaska Native	50	0.1%
Asian	187	0.5%
Black/African American	16,767	45.5%
Native Hawaiian/Other Pacific Islander	45	0.1%
White	13,610	37.0%
Other	175	0.5%
No Response	5,512	15.0%
Ethnicity	Number of Tenants	Percent of Tenants
Hispanic or Latino	486	1.3%
Not Hispanic or Latino	30,824	83.7%
No Response	5,512	15.0%
Gender	Number of Units	Percent of Units
Female	Unknown	Unknown
Male	Unknown	Unknown

H. Multifamily Bond Authority

Demographic information is not compiled separately for the Multifamily Bond Authority program. Demographic information for this program has been included in LIHTC data and can be found in Table 37 of this report.

I. THDA Homeownership Programs

During FY 2014-15, there were 2,028 first mortgage loans made through the THDA homeownership programs. The largest number of loans was made to married couples, followed by single female and single male households. Detailed information regarding all of THDA's loan programs presented in Table 39.

Table 39
THDA Loans by Household Type
THDA Homeownership Programs

ALL LOANS	1 Person	2 Persons	3 Persons	4+ Persons	Total
Female with Child	6	135	102	57	300
Male with Child	17	33	29	34	113
Married Couple	5	237	200	310	752
Single Female	326	51	10	9	396
Single Male	332	84	11	2	429
Single parent with Child	16	6	9	4	35
Other	3	0	0	0	3
Total	705	546	361	416	2,028
Great Choice	1 Person	2 Persons	3 Persons	4+ Persons	Total
Female with Child	0	3	2	1	6
Male with Child	1	1	2	0	4
Married Couple	0	23	9	16	48
Single Female	6	3	2	0	11
Single Male	13	4	0	0	17
Single parent with Child	1	0	0	0	1
Other	0	0	0	0	0
Total	21	34	15	17	87

Great Choice Plus	1 Person	2 Persons	3 Persons	4+ Persons	Total
Female with Child	6	116	85	46	253
Male with Child	16	31	26	32	105
Married Couple	5	211	185	276	677
Single Female	312	45	6	7	370
Single Male	316	80	10	2	408
Single parent with Child	15	6	8	4	33
Other	3	0	0	0	3
Total	673	489	320	367	1,849

New Start	1 Person	2 Persons	3 Persons	4+ Persons	Total
Female with Child	0	16	15	10	41
Male with Child	0	1	1	2	4
Married Couple	0	3	6	18	27
Single Female	8	3	2	2	15
Single Male	3	0	1	0	4
Single parent with Child	0	0	1	0	1
Other	0	0	0	0	0
Total	11	23	26	32	92

Average income by household type for each of the programs is presented in the below table. The average income level for the Great Choice and Great Choice Plus, were \$45,673 and \$56,320 respectively. An average New Start borrower's income was \$28,187.

Table 40
Average Income by Household Type
THDA Homeownership Programs

Program	ALL LOANS	
Household Type	HHs	Average Income
Female with Child	300	\$44,426
Male with Child	113	\$49,952
Married Couple	752	\$64,046
Single Female	396	\$46,181
Single Male	429	\$54,683
Single parent with Child	35	\$48,052
Other	3	\$46,345
Total	2,028	\$54,587

Program	Great Choice		Great Choice Plus		New Start	
Household Type	HHs	Average Income	HHs	Average Income	HHs	Average Income
Female with Child	6	\$30,341	253	\$47,287	41	\$28,833
Male with Child	4	\$42,450	105	\$51,310	4	\$21,812
Married Couple	48	\$48,410	677	\$66,506	27	\$30,161
Single Female	11	\$44,420	370	\$47,046	15	\$26,126
Single Male	17	\$45,347	408	\$55,394	4	\$21,855
Single parent with Child	1	\$38,535	33	\$48,883	1	\$30,134
Other	0	NA	3	\$46,345	0	NA
Total	87	\$45,673	1,849	\$56,320	92	\$28,187

The following table presents mortgage program data by race/ethnicity and age. During the reporting period, 25.2 percent of all mortgages were made to minorities and 74.8 percent were made to non-minorities. White households, Black/African American Households were most frequently served by THDA's Homeownership Programs. The following table presents loan program data by race and ethnicity.

Table 41
Race/Ethnicity of Borrower
THDA Homeownership Programs

Race	Number of Primary Borrowers	Percent of Primary Borrowers
White	1,517	74.8%
Black/African American	464	22.9%
Asian	23	1.1%
American Indian/Alaskan Native	3	0.1%
Native Hawaiian/Pacific Islander	5	0.2%
Multi-Racial	0	0.0%
Other/Unknown	16	0.8%
Total	2,028	100%
Ethnicity	Number of Primary Borrowers	Percent of Primary Borrowers
Hispanic	121	6.0%
Non-Hispanic	1,907	94.0%
Total	2,028	100%

Households ages 29 and younger accounted for 42.4 percent of all mortgages made during the reporting period. The table below shows mortgages by age of the primary borrower.

Table 42
Age of Borrowers
THDA Homeownership Programs

Age Group	Number of Primary Borrowers	Percent of Total Primary Borrowers
Less than 25	435	21.4%
25 – 29	424	20.9%
30 – 34	377	18.6%
35 – 39	263	13.0%
40 – 44	170	8.4%
45 +	359	17.7%
Total	2,028	100%

J. BUILD Loan Program

There was no activity to report in the BUILD Loan Program for FY 2014-15.

K. Community Investment Tax Credit

During FY 2014-15, THDA and the Tennessee Department of Revenue, awarded credits through CITC for 67 different affordable housing projects with a total investment amount of \$54,027,643. The projects eligible under the CITC program will contribute to the availability of approximately 1023 units of affordable housing for 1415 beneficiaries. Demographic data regarding the beneficiaries of CITC projects was not available at the time of this report.

L. Emergency Repair Program

The Emergency Repair Program (ERP) provides grants to low-income homeowners that are age 60 years or older to correct, repair or replace an essential system and/or critical structural problem. During the reporting period, the ERP assisted 81 units and 224 total family members. The majority of beneficiaries were in Middle Tennessee (41 percent), followed by East Tennessee (39 percent) and West Tennessee (20 percent). While all of the beneficiaries of the ERP are elderly and low-income, more detailed beneficiary information can be found below.

Table 43
Beneficiary Characteristics
Emergency Repair Program

Income Category	East	Middle	West	Total
0 – 30% of AMI	25	29	9	63
31 – 50% of AMI	46	51	31	128
51 – 60% of AMI	16	13	4	33
Unknown	0	0	0	0
Total	87	93	44	224

Race	East	Middle	West	Total
White	65	67	13	145
Black/African American	20	25	30	75
Asian	0	0	0	0
Native Hawaiian/Other Pacific Islander	1	0	0	1
Other	1	0	0	1
Unknown	0	1	1	2
Total	87	93	44	224

Ethnicity	East	Middle	West	Total
Hispanic	0	0	0	0
Not Hispanic	83	90	43	216
Unknown	4	3	1	8
Total	87	93	44	224

M. Rural Repair

All of the beneficiaries of THDA's Rural Repair Program, which is administered in partnership with USDA, are low-income. During the reporting period, the Rural Repair Program assisted 151 units. Table 44 presents other information regarding the program's beneficiaries.

Table 44
Demographics and Household Size
Rural Repair Program

Rural Repair Participants	East	Middle	West	Total
<i>Household Type</i>				
Elderly or Disabled	33%	22%	44%	97%
Non-Elderly/Non-Disabled	25%	0%	75%	3%
<i>Race</i>				
White	51%	26%	23%	63%
Black	4%	14%	82%	37%
Other Race	0%	0%	0%	0%
<i>Household Size</i>				
1	28%	20%	52%	66%
2	44%	22%	34%	27%
3	25%	25%	50%	3%
4	50%	50%	0%	3%
5	50%	0%	50%	1%
6	0%	100%	0%	1%
Total Heads of Household	50	33	68	151

Summary

Overall, the four formula programs assisted 266,583 individuals and an additional 87 households. The CDBG program served 248,741 persons and the majority of the beneficiaries were low- to moderate-income. During the reporting period, the HOME program completed 87 units and 66 percent of the households receiving assistance were very low-income. The remaining households were low-income. The ESG funds assisted 17,095 homeless individuals or individuals who are at risk of homelessness. The HOPWA program assisted 441 individuals with HIV/AIDS and an additional 306 affected family members for a total of 747 beneficiaries. All of the HOPWA beneficiaries were low-income.

Other resources contributing to affordable housing and community development also assisted a large number of Tennesseans. The Section 8 Tenant Based Housing Choice Voucher program assisted 6,700 households and the Section 8 Project Based Rental Assistance program provided assistance to 48,639 individuals. The LIHTC and Multifamily Bond authority assisted 39,143 individuals and the THDA Homeownership Programs helped 2,028 households secure a loan. The CITC program contributed to 1,023 units of affordable housing that benefitted 1,415 individuals. The ERP assisted 224 persons and Rural Repair assisted 151 persons.

Together, the four Consolidated Plan Grant Programs and programs providing other affordable housing resources served 364,883 individuals and an additional 87 households.

STATE OF TENNESSEE
FISCAL YEAR 2014-15 CAPER
PART II
ASSESSMENT OF ANNUAL PERFORMANCE

V. REVIEW AND ASSESSMENT OF PRIORITIES AND ACTION STEPS

A. Review of Priorities and Action Steps

The HUD Performance Measurement Outcome System states the following three objectives: to create a suitable living environment, to provide decent housing and to create economic activities. In the five-year Consolidated Plan, the State of Tennessee established four priorities that compliment HUD's three performance measurement objectives and are related to housing and non-housing community development needs. These priority areas were approved by HUD in the State's 2010-15 Consolidated Plan. Each of the four priorities list action steps that coincide with the intent of the four priority areas. The "Assessment of Annual Performance" section of the FY 2014-15 CAPER focuses specifically on the four priority areas and the State's progress in meeting objectives. The four priorities and their corresponding actions steps are as follows:

Housing

1. Preserve the affordable housing stock, increase the amount of affordable housing and increase home ownership opportunities.

Action Steps:

- 1) Preserve the affordable housing stock through housing rehabilitation targeted toward very low-, low- and moderate-income populations in the state.
- 2) Encourage the production of multifamily housing to serve low-income individuals in the state.
- 3) Target funds towards housing for elderly residents in the state with an emphasis on handicapped accessibility.
- 4) Encourage the preservation of 2-3 bedroom affordable housing units for low-income families in the state.
- 5) Increase/maintain the number of housing facilities in the state for homeless individuals.
- 6) Increase the ownership rates, especially among lower income and minority households.

Non-Housing Community Development Needs

2. Provide for the viability of communities through ensuring infrastructure, community livability, health and safety, and economic development.

Action Steps:

- 7) Provide for the safety and well-being of low- and moderate- income families in the state by improving the quality and quantity of water in areas which do not have safe, reliable water sources.
 - 8) Provide safe, reliable wastewater services to low- and moderate-income families in underserved areas of the state.
 - 9) Provide economic development opportunities through financing of infrastructure development, manufacturing facilities and equipment that support job creation for low and moderate income people.
 - 10) General enhancement of quality of life of low and moderate income neighborhoods throughout the state.
3. Provide for the housing and supportive services needs of homeless individuals and other special needs populations.

Action Steps:

- 11) Support the acquisition and rehabilitation of facilities to house homeless persons or those at risk of homelessness.
 - 12) Provide funds to assist persons at risk of homelessness.
 - 13) Increase the amount of services provided to mentally ill homeless.
 - 14) Encourage programs to support children in homeless facilities to receive preventative and emergency medical care, as well as other development or cognitive services.
 - 15) Provide supportive services and housing-related services for persons who are HIV positive or have AIDS.
4. Affirmatively further fair housing and ensure access to business opportunities in the state for women and minority-owned businesses.

Action Steps:

- 16) Conduct an Analysis of Impediments to Fair Housing Choice in the state.
- 17) Convene fair housing and Title VI workshops in the state for local governments, grantees, housing providers, advocates and consumers.
- 18) Provide fair housing information throughout the state, informing citizens of their housing rights.

- 19) Encourage reporting of fair housing violations by making citizens aware of their rights and providing information on access to fair housing advocates and organizations in the state.

B. Assessment of Progress in Meeting Priorities

This section speaks generally about the state's progress in working towards each of the four priority areas discussed above. The following section discusses in greater detail the state's progress in providing affordable housing and the state's performance in terms of the specific action steps associated with each of the four priority areas. While the action steps focus on shorter-term goals that can be accomplished in one to three years, the priority areas represent general and longer-term goals of the four Consolidated Partners.

Housing

1. Preserve the affordable housing stock, increase the amount of affordable housing and increase home ownership opportunities.

The State of Tennessee's first priority area specifically focuses on the provision of affordable housing opportunities throughout the state, whether through preserving the affordable housing stock that already exists, increasing the number of new affordable housing stock or by creating new homeownership opportunities. Each aspect of the first priority area and the state's progress is addressed individually.

In regards to preserving the affordable housing stock, both the CDBG and HOME Programs work towards this goal through homeowner and rental rehabilitation activities. In FY 2014-15, CDBG applicants rehabilitated 2 homes. In FY 2014-15, the HOME Program completed 33 homeowner rehabilitations, which comprised of 38 percent of the total projects completed under the HOME Program during the reporting period. Thirty-eight rental rehabilitations were also completed during the fiscal year.

Other programs that contribute to preservation of the affordable housing stock through rehabilitation include: THDA's BUILD Loan Program, the Community Investment Tax Credit (CITC) Program, the Low Income Housing Tax Credit (LIHTC) Program and Multifamily Bond Authority Programs, the Emergency Repair Program (ERP) and the Rural Repair Program (RRP). ERP corrected, repaired or replaced an essential system and/or critical structural problem for 81 units during the reporting period and the Rural Repair Program completed an additional 151 rehabilitations. A portion of the 1023 units to be created by the CITC Program, which will house up to 1415 households, will be rehabilitated units. The LIHTC Program, along with the Multifamily Bond Authority, will provide 1,112 rehabilitated units.

A number of programs work to increase the amount of affordable housing in Tennessee by creating new single family and multifamily units and maintaining existing units. In total, 12 new construction units were completed during the fiscal year with funds previously awarded through the HOME

Program. Other programs working to create new units include the CITC program, which will provide 181 new units, along with the LIHTC program and Multifamily Bond Authority program, which will together provide 1,044 new low-income multifamily units¹⁰. During the fiscal year, these programs will contribute to the creation of 1,225 total units of affordable housing.

New homeownership opportunities are created through the HOME Program and THDA's various Homeownership Programs. THDA's Homeownership programs provided loans to 2,028 households in the amount of \$239,995,354. Starting in October 2013, THDA discontinued offering Great Rate, Great Start and Great Advantage program loans and introduced the Great Choice and Great Choice Plus loan programs.

The above programs and projects contribute to the completion of action steps one through six.

Community Development Needs

2. Provide for the viability of communities through ensuring infrastructure, community livability, health and safety, and economic development.

All four of the Consolidated Plan grant programs contribute to each aspect of the second priority either directly or indirectly through the provision of services that contribute to the enhancement of infrastructure, community livability, health and safety and economic development. Each aspect of the priority area is discussed separately below.

In regards to infrastructure, three of the four Consolidated Plan grant programs contribute to the improvement of infrastructure in Tennessee. The CDBG program contributed 79 percent of its FY 2014-15 awards to public facilities and water and sewer programs. Approximately 11 percent of the funds will go towards clearance and relocation and approximately 3 percent will go towards residential rehabilitation. Each of these activities seeks to improve existing infrastructure or build new infrastructure. The HOME Program seeks to improve existing housing infrastructure or build new infrastructure through the provision of new affordable housing and the rehabilitation of existing affordable housing. ESG funds may be used towards the rehabilitation or conversion of shelters, which also contributes to existing housing infrastructure.

Other programs included in this report and contributing to the maintenance of housing infrastructure through both single and multi-family housing rehabilitation include: the LIHTC Program, the Multifamily Bond Authority, the BUILD Loan Program, the CITC Program, the ERP and the Rural Repair Program. Programs contributing to housing infrastructure through new construction of single and multi-family housing include: the LIHTC Program, the Multifamily Bond Authority, the BUILD Loan Program and the CITC Program.

¹⁰ The LIHTC program will also contribute to the creation of market rate multifamily units.

The four Consolidated Partners see the availability of affordable housing and affordable housing opportunities as contributing to community livability. Similarly, the health and safety of neighborhoods and communities contribute to a community's livability. Each of the four formula programs contributes to community livability and the health and safety of communities. The CDBG program contributes to livability through its housing rehabilitation, public facilities and water and sewer projects as well as to projects that are specifically qualified as Community Livability projects and involve the purchase of fire trucks, drainage improvements, building health and community centers and other proposed projects that contribute to the health and safety of the community. For the 2014-15 year, those projects totaled \$4,442,079. New construction and upgrades to public facilities, as well as water and sewer projects directly contribute to the health and safety of neighborhoods. Access to essential services and clean water are important to the health and safety of a community.

The HOME Program also contributes to the livability of communities by improving the availability of affordable housing through rehabilitation and new construction activities. Upgrades to existing housing works to create safe rental units and homeowner occupied units. All of the FY 2014-15 HOME funds, with the exception of administrative costs and homeowner down payment assistance, will be used towards rehabilitation and new construction of affordable housing. Access to the special services provided through the HOPWA and ESG programs also contribute to the livability of communities and the health and safety of those communities. Emergency shelters make communities more livable for homeless persons and those at risk of homelessness. The services provided through homeless prevention and rapid re-housing address the availability of safe and affordable housing. Finally, the HOPWA Program through its Supportive Services and Short-Term Rent, Mortgage, and Utility (STRMU) Assistance program make communities more livable for its beneficiaries. Supportive Services provided through the program also contribute to the health and safety of its participants.

Other programs that contribute to the livability of communities by providing new affordable housing, rehabilitation of existing affordable housing and rental opportunities include: the Section 8 Project Based and Tenant Based Housing Choice Voucher programs, the LIHTC Program, the Multifamily Bond Authority, the BUILD Loan Program, the CITC Program, THDA Homeownership Programs, the ERP and the Rural Repair Program.

Out of the four formula programs, the CDBG program is most involved in economic development activities. Economic development is one of the project categories in which CDBG funds can be used. Of the funds available in FY 2014-15, 79 percent was used towards public facilities and water and sewer projects. These projects contribute to the economic development opportunities in the communities where the CDBG projects take place. Additionally, CDBG has funds available for specific economic development projects that are tied to direct job creation. FY 2014-15 funds were not set aside for these projects because the CDBG Economic Development Loan program has loan repayment funds available that must be drawn down prior to the allocation of regular round funding. In addition to the CDBG Program, the HOME Program contributes to economic

development through the jobs that are created as a result of new construction and affordable housing rehabilitation. The HOME program contributes to the local economy through ongoing construction and rehabilitation.

Each year, THDA estimates the economic impact of THDA activities on the broader economy. In addition to benefiting individuals and families, THDA's affordable housing programs create additional jobs, income and spending in the local economy and add to state and local revenues. In 2014, the total contribution of THDA's affordable housing programs to the local economy was estimated at \$656 million. This estimation is the sum of direct THDA spending, indirect business to business transactions in Tennessee's economy and additional employee spending. Programs contributing to the total economic impact include: the Emergency Solutions Grant (ESG) Program, THDA Homeownership Programs, LIHTC, the Multifamily Bond Authority, the Section 8 Housing Choice Voucher Program, the CITC Program, the Rural Repair Program, the ERP for the Elderly and other THDA programs that are not detailed in this report.

Projects and programs discussed above contribute to the completion of action steps seven through ten.

3. Provide for the housing and supportive services needs of homeless individuals and other special needs populations.

The third priority area focuses on supportive services for homeless individuals and other special needs populations. The two formula programs that are primarily responsible for addressing this priority area are the ESG and HOPWA Programs. ESG specifically provides services for individuals and families who are homeless and persons who are at risk of homelessness. The HOPWA Program provides housing assistance and related supportive services to persons living with HIV/AIDS and their families, which is considered a special needs population.

The ESG Program is the largest contributor to providing supportive services for homeless individuals. ESG funds were awarded for the operation and maintenance of homeless shelters, essential services, homeless prevention, rapid re-housing, HMIS and program administrative costs. During this reporting period both 2013 and 2014 funds were allocated for homeless assistance programs in Tennessee.

The 2013 ESG funding awarded the first \$100,000 of ESG funds (which did not need a match) to 7 Mental Health Regional Housing Coordinators who provide homeless assistance programs for the mentally disabled. This activity will meet HUD's Discharge Planning requirement to ensure that persons being released from hospitals, prisons and mental health facilities are not discharged with no place to go. 52% of the remaining funds were awarded to 11 entitlement Cities in a formula-based allocation. The remaining 48% was awarded on a competitive basis to non-profits throughout the State. This grant term is July 1, 2014 – June 30, 2015. During this reporting period, \$2,226,946

was awarded for street outreach, the operation and maintenance of homeless shelters, essential services, homeless prevention, rapid re-housing, data collection and program administrative costs.

The 2014 ESG funding application round awarded the first \$100,000 of ESG funding (which did not need a match) to two non-profit agencies who provide services to homeless youth under the age of 24. The City of Knoxville was ineligible to continue as a participating jurisdiction under ESG and therefore received a special set-aside allocation of \$130,308. The remaining funds were placed in a special competitive application round in the fall of 2014, with an emphasis on Rapid Re-Housing. Eleven applicants were funded for a total of \$823,591. This grant term is January 1, 2015 – December 31, 2015.

There was a total of 17,095 beneficiaries served by the ESG Program for FY 14-15.

During the reporting period, the HOPWA program assisted 441 individuals with HIV/AIDS and 306 affected family members. Beneficiaries of the program receive assistance in five areas. The first program area is the housing information services program, which may include counseling, information and referral services to help clients locate, acquire, finance and maintain housing. The second area is Short-Term Rent, Mortgage and Utility (STRMU) assistance, which intends to prevent homelessness of either a tenant or mortgage holder over a specified period of time. The supportive services program is the third program component and includes health, mental health, drug and alcohol abuse treatment and counseling, day care, nutritional services, intensive care and assistance in gaining other local, state and federal government services. The fourth program area is the permanent housing placement program, which provides housing placement services to help clients establish a new residence. The final program area is the Ongoing Housing Assessment Plan, which provides periodic reviews of housing needs, investigation of homelessness and current health issues to help assist individuals manage resources, track progress and access community care.

The programs and activities discussed above work towards action steps 11-15.

4. Affirmatively further fair housing and ensure access to business opportunities in the state for women and minority-owned businesses.

Each of the four formula programs contributed towards this priority area through program administration and in other efforts related to affirmatively furthering fair housing. The development of a statewide Analysis of Impediments to Fair Housing Choice and improvements made to activities that affirmatively further fair housing are explained in detail in Section VIII of this report. This section discusses how each program ensures subrecipients of the four formula programs are also working towards the action steps associated with each priority area.

In regards to the administration of the program, ECD ensures requirements related to fair housing and women and minority-owned businesses are fulfilled through its program requirements. All grantees of CDBG funds are required to comply with Civil Rights requirements and the Fair Housing

Act. Grantees must demonstrate: affirmative steps to promote fair and equal access to housing; regardless of the grant or amount of grant; equal opportunities are afforded to all persons and no person shall be excluded or denied program benefits on the basis of race, color, religion, sex, national origin, age or disability; minority and female-owned businesses must be informed of grant funded contracts and affirmative steps must be taken to assure this; and to the greatest extent feasible, Section 3 resident and business concerns should be given preference in employment, training and contracting. The ways in which ECD has completed action steps and contributed to this priority area are described in Section VIII of this report.

The HOME Program, administered by THDA, states that “no person in the United States shall on the grounds of race, color, religion, sex, familial status, national origin, age or disability be excluded from participation, denied benefits or subjected to discrimination under any program funded in whole or in part by HOME funds.” Subrecipients of HOME funds must comply with all federal requirements that are applicable to HOME projects. THDA also requires local programs to adopt affirmative marketing procedures and requirements, which must be approved by THDA prior to any HOME funds being committed to a project of five or more units. Subrecipients are required to maintain records of their actions for HUD’s Office of Fair Housing and Equal Opportunity (FHEO) monitoring purposes, including advertisements for employment and documentation of subsequent applications and individuals hired. HOME subrecipients receive fair housing training when they attend the HOME Workshops, which include a session dedicated to fair housing. Activities in which THDA engaged to fulfill its obligation to further fair housing and work towards this priority area are included in Section VIII of this report.

All ESG subrecipients must perform and document actions in the area of enforcement and promotion of affirmatively furthering fair housing. They must also carry out a minimum of one activity a year to promote fair housing. Non-discrimination and equal opportunity laws are also applicable to ESG projects and subrecipients. Publicity surrounding the availability of shelter facilities reaches all persons regardless of handicap, race, color, religion, sex, age, familial status or national origin. Activities conducted by THDA and related to this priority area are found in Section VIII of this document.

HOPWA project sponsors are required to comply with anti-discrimination legislation including the Americans with Disabilities Act, Title VI and the Fair Housing Act. Title II of the ADA directly influences neighborhoods where minimal public investment has led to poor living standards. HOPWA funds are made available to help upgrade and transform these neighborhoods. All HOPWA funds are used to assist clients regardless of race, color, religion, national origin, disability and familial status. HOPWA’s contract with project sponsors contains anti-discrimination conditions and grantees are required to show proof of nondiscrimination and must post notices of nondiscrimination. Actions related to this priority area and completed during the reporting period by DOH are included in Section VII of this report.

The above actions by the Consolidated Partners in reference to the administration of their programs work towards the completion of action steps 18 and 19. Actions taken to conduct an Analysis of Impediments to Fair Housing Choice (action step 16) and efforts to convene fair housing and Title VI workshops (action step 17) are detailed in Section VII of this report.

VI. EVALUATION OF THE JURISDICTION'S PROGRESS IN PROVIDING AFFORDABLE HOUSING

HUD Resources Made Available Under the Consolidated Planning Programs

HUD's Performance Measurement Outcome System and the State of Tennessee's four priority areas emphasize the importance of providing affordable housing throughout the state. The following section provides an evaluation of the jurisdiction's progress in meeting the objective of providing affordable housing and also assesses the State's progress in terms of the action steps associated with each of the four priority areas. Each program, including programs that contribute to affordable housing, outside of the four Consolidated Plan grant programs, is addressed individually and the ways in which it contributes to the priority of providing affordable housing is described below. State Table 3B, included in Appendix E of this document, also shows the State of Tennessee's completion of affordable housing goals.

A. Community Development Block Grant (CDBG) Small Cities Program

During the reporting period, CDBG funds assisted with affordable housing activities completing rehabilitation on 28 existing units. With FY 2015-16 funds, the CDBG Program proposes to complete affordable housing activities at the same rate as with FY 2015-16. Rehabilitation activities delivered through the CDBG Program specifically addresses Action Steps 1, 4, and 10.

B. HOME Investment Partnership (HOME)

The HOME Program works to provide affordable housing through homeowner rehabilitation, rental rehabilitation, homeownership and new construction. In FY 2014-15, the HOME Program contributed to the completion of 87 units of affordable housing, utilizing funds from various program years. All beneficiaries of the HOME program are low- and moderate-income. The activities provided by the HOME Program specifically address Action Steps, 1, 2, 3, 4, 6 and 10.

C. Emergency Solutions Grants (ESG)

ESG works to provide affordable housing through its Homeless Assistance and Homeless Prevention activities, which include Rapid Re-Housing and Homelessness Prevention. During the reporting period, the ESG Program assisted over 17,095 Tennesseans with ESG funds. The ESG program provided 814 bed spaces during the reporting period. Activities and services delivered through the ESG Program, specifically address Action Steps 5, 11, 12, 13 and 14.

D. Housing Opportunities for Persons with AIDS (HOPWA)

During the reporting period, the HOPWA program assisted 441 individuals with HIV/AIDS and 306 family members. The HOPWA Program provides for affordable housing through its Housing Information Services Program, Short-term Rent, Mortgage and Utility Payment Program and its Permanent Housing Placement Program. The programs and services offered through the HOPWA Program specifically address Action Steps 11, 12, 14 and 15.

Other Resources Made Available

E. HUD Section 8 Housing Choice Voucher Program

At the end of the reporting period, the Section 8 Housing Choice Voucher provided rental assistance to 6,700 households and \$30,563,240 was made available for the program. This program specifically addresses Action Steps 1, 2, 3 and 4.

F. HUD Section 8 Contract Administration Program

During FY 2014-15 the HUD Section 8 Contract Administration Program provided 28,976 units of affordable housing and Housing Assistance Payments in the amount of \$157,686,804. This program also addresses Action Steps 1, 2, 3 and 4.

G. Low Income Housing Tax Credit (LIHTC) Program

LIHTC issued \$16,518,809 in 2014 tax credits. The LIHTC Program will contribute to the creation or rehabilitation of 2,611 units of affordable housing. The LIHTC Program addresses Action Steps 1, 2 and 4.

H. Multifamily Bond Authority

The Multifamily Bond Authority made \$25,075,000 available to local issuers during Calendar Year 2014. These funds will contribute to the creation or rehabilitation of 580¹¹ units of affordable housing. The Multifamily Bond Authority addresses Action Steps 1, 2 and 4.

I. THDA Homeownership Programs

THDA's previous homeownership programs: Great Rate, Great Start, Great Advantage and New Start, along with the two new homeownership programs: Great Choice and Great Choice Plus, provide opportunities for low- and moderate-income persons to purchase their first home. During the reporting period, THDA made 2,028 homeownership loans totaling \$239,995,354. The THDA Homeownership Programs address Action Steps 1 and 6.

J. BUILD Loan Program

The BUILD Loan Program builds the capacity of nonprofit organizations to provide affordable housing to low income Tennesseans. There was no BUILD activity to report during FY 14-15. The BUILD Loan Program addresses Action Steps 1, 2 and 4.

K. Community Investment Tax Credit (CITC)

The CITC Program allows financial institutions to obtain a credit against the sum total of taxes imposed when qualified loans, investments, grants or contributions are extended to eligible housing entities for engaging in low income housing activities. Credits were awarded for 67 affordable housing projects with a total investment amount of \$54,027,643 during the reporting period. The CITC Program addresses Action Steps 1, 2 and 4.

L. Emergency Repair Program for the Elderly (ERP)

¹¹ The units from the Multifamily Bond Authority Program are also included in the units created by the LIHTC Program.

ERP provides grants to low income homeowners who are 60 years or older to correct, repair or replace an essential system and/or critical structural problem. During the reporting period, 81 units and 224 individuals were assisted with ERP funds. The ERP Program specifically addresses Action Steps 1, 3 and 4.

M. Rural Repair Program

The Rural Repair Program provides funds for the repair of homes of low income individuals. During the reporting period, the Rural Repair Program assisted 151 units of housing and 225 individuals. The Rural Repair Program specifically addresses Action Steps 1, 3 and 4.

VII. OTHER ACTIONS INDICATED IN THE CONSOLIDATED PLAN AND ACTION PLAN

A. Section 8 Family Self Sufficiency Program

The Family Self Sufficiency (FSS) Program is a part of the HUD Section 8 Housing Choice Voucher Program, which began in 1990 as an effort to enable Section 8 participants to become self-sufficient or independent of welfare assistance. The program is administered by the Rental Assistance Division of THDA with additional federal funds to support FSS staff.

FSS participants sign a five-year contract in which they agree to find employment and identify goals for achieving financial independence. Staff assists participants in identifying goals and provides referrals for resources in the community. Participants are eligible for the establishment of an escrow account, which is based on increased income as a result of employment. The funds in the escrow account may be accessed by the participant once the contract is fulfilled or the family is paying all of their rent.

In 1998, the FSS program was mandated to have 181 participants. Since 1998, over 181 participants have graduated from the program, making the program voluntary. THDA has opted to have 235 slots available to Housing Choice Voucher participants.

B. Rental Assistance Homeownership Voucher Program

The THDA Homeownership Voucher Program offers a mortgage subsidy to low-income families who are not able to afford to purchase a home through traditional financing. With the Homeownership Voucher Program, families typically pay 30 percent of their monthly-adjusted income (or the family's Total Tenant Payment) towards homeownership expenses and THDA pays the difference between the family Total Tenant Payment and the actual monthly mortgage payment. The mortgage assistance payment is paid directly to the lender or loan servicing company and not to the family. At the end of the reporting period, June 30, 2015, 81 home closing had occurred using this program.

C. Lead Based Paint

Title X of the federal Residential Lead Based Paint Hazard Reduction Act of 1992 became effective on December 6, 1996. On September 26, 2000, the Tennessee Department of Environment and Conservation (TDEC) implemented a certification program and compiled a registry of certified lead inspectors, risk assessors, contractors and training facilitators.

In April 2001, HUD and the Environmental Protection Agency (EPA) issued a joint memorandum to clarify Title X requirements for rehabilitation of housing to clarify the definition of abatement under regulations issued by EPA and HUD. It also asserted in the memorandum that HUD and EPA regulations were complementary. On May 2, 2011, THDA and TDEC issued a joint memorandum that allows for the use of HUD regulations in rehabilitation projects. TDEC certified that lead based paint professionals must be used. These joint efforts have enabled rehabilitation efforts to continue.

Each of the four Consolidated Planning grant programs have lead based paint requirements. In regards to the CDBG and HOME programs, subrecipients must give participants of the program notice of possible lead hazards within the unit when the house is dated pre-1978 and must inform them of possible dangers. The Lead Chapter of the HOME Operations manual, which provides further guidance for compliance with HUD regulations, is made available to all grantees and can be found on THDA's website. THDA monitors for compliance with lead based paint regulations during project monitoring. Housing assisted with ESG funds are also subject to the Lead Based Paint Poisoning Prevention Act and based on the activity, must comply with various subparts of the Act.

VIII. ACTIONS TAKEN TO AFFIRMATIVELY FURTHER FAIR HOUSING

A. Statewide Analysis of Impediments to Fair Housing Choice

In October of 2011, the consolidated partners began a series of meetings to modify the current procedures regarding the Analysis of Impediments (AI) to Fair Housing Choice and the state's obligation to affirmatively further fair housing, as a result of comments made by HUD's Office of Fair Housing and Equal Opportunity (FHEO) in regards to the FY 2011-12 CAPER. These conversations continued throughout 2012 and resulted in a decision by the consolidated partners to hire a third-party consultant to assist in the development of a state-wide AI. In October of 2012, a Request for Proposals (RFP) was issued to secure a consultant. Six responses to the RFP were received and were scored and ranked by ECD and THDA staff according to state procurement policies. Western Economic Services (WES) was selected to complete the AI.

A planning meeting was held with ECD, THDA and WES in January, 2013. It was determined that WES would conduct a survey of the 40 largest non-entitlement municipalities in the state to assess local practices and land uses that may span a number of jurisdictions and might not be in the spirit of affirmatively furthering fair housing. WES would hold three fair-housing forums across the state to present information on the AI based on a review of the data available from sources such as the U.S. Census Bureau, the U.S. Bureau of Labor Statistics, the U.S. Bureau of Economic Analysis, etc. A Fair Housing Survey would also be conducted online to give all partners throughout the state a chance to answer questions about their view of fair housing in the state, the challenges and what is needed.

The Forums were held in Jackson, Nashville and Knoxville during the week of March 18, 2013. Participants included housing advocates, representatives of local service agencies, real estate agents, local elected officials and others. More than 140 people attended the forums and were given the chance to view, ask questions of and comment on the preliminary findings of the AI.

The Fair Housing survey was sent out in February 2013 and available through April 2013. More than 850 people completed the survey weighing in on fair housing issues in the public and private sectors. Data from these sources combined with information on the Fair Housing complaints received in the state and data from the Community Reinvestment Act (CRA) and Home Mortgage Disclosure Act (HMDA) were combined to develop a list of impediments to fair housing choice in the state.

The draft of the AI was on the THDA and ECD websites for public comment in May 2013. Comments received were addressed by WES and incorporated in the final draft that was produced in June 2013 and submitted to ECD in July 2013.

In October 2013, WES presented the AI at the Tennessee Governor's Housing Summit (sponsored by THDA). This was the final piece of outreach for the initial release of the study. At the same session, the Metropolitan Development and Housing Authority for Nashville-Davidson County presented their AI to assist the audience in understanding fair housing issues facing the state as a whole as well as a local urban jurisdiction.

Public and private sector impediments were identified along with suggested actions. Based on the AI, THDA and ECD developed Fair Housing Activities, presented in the Annual Action Plan, which were implemented in FY 2014-15. These activities address the identified impediments and show the Consolidated Partners' commitment to affirmatively furthering fair housing in Tennessee. The Consolidated Partners will use the AI, along with the Fair Housing Plan developed from the AI, for the next several years to continue to address impediments, including the current year's Annual Action Plan. The final AI is available on the THDA and ECD websites.

B. Fair Housing Activities and Training

The activities of each agency administering the four Consolidated Plan grant programs are described below.

1. Tennessee Department of Economic and Community Development (ECD), CDBG Program

ECD assumed the lead role for developing and securing a statewide Analysis of Impediments to Fair Housing Choice (AI) study in 2012-13 which was distributed to each of the grantees this year. ECD worked to ensure each grantee had access to the study and used it to develop their fair housing activity that is required as part of their grant agreement. Completion of a Fair Housing Activity is not a specific budget line-item but it is an eligible expense for the communities. For the 2014-15 year, approximately 76 fair housing activities were conducted by the Consolidated Planning partners in local communities between the regular round and disaster applications. The Annual Action Plan addresses other fair housing activities and the expected costs of completion.

The overall programmatic activities funded through the CDBG program work towards furthering fair housing across the state. CDBG projects are targeted at improvements, which benefit low and moderate

income people, as well as minorities, persons with disabilities, elderly persons and female-headed households. ECD collects and analyzes data on those served by CDBG projects and reports findings to HUD annually.

In its CDBG manual, ECD informs all grantees of their roles and responsibilities and program requirements. Each grantee is required to conduct a fair housing activity, those activities have to be approved by the Director of Community Programs. Based on the impediments in the AI, during the 2014-2015 program year, the grantees focused on educating elected officials about fair housing laws and responsibilities and on communicating fair housing laws to realtors and bankers in their communities. Other activities included various ways to educate the public about their rights.

During FY 2014-15, ECD has also started a better tracking process for the Fair Housing activities completed by each grantee. At the end of each project, the grantee signs off that they have completed a FH activity, how that activity related to the AI, and the funds spent on the activity. During the year, approximately \$3,000 was spent by grantees on activities. These activities including publishing notices in newspapers about FH Month or about activities completed by commissions to support FH, public service announcements from the local radio stations, trainings for local officials at council/commission meeting, etc. This number is expected to increase during the next year as the grantees begin to use CDBG funds to support the FH activities more often.

Each grantee must also document relocation that occurs due to grant activities, must include equal opportunity language in their contracts, must create and post an Equal Opportunity Employer policy, must follow Section 3 requirements, must follow Section 504, must involve minority and female contractors and must complete contractor activity reports that outline contracts.

ECD also sponsored, assisted in the planning for, and attended the Tennessee Fair Housing Matters Conference during fair housing month. Together with the consolidated partners, ECD will assist in creating and implementing a strategy to address impediments found in the AI. Throughout the year, ECD will continue to disseminate findings of the AI to subrecipients and will provide educational opportunities for subrecipients on identifying fair housing issues and working to improve existing impediments. A guide for grantees is in development to help them plan for the Fair Housing Activity and assure that it addresses impediments identified in the AI.

Additional fair housing related activities completed by ECD during FY 2014-15 are included in the following table.

Table 45
FY 2014-15 Fair Housing Activities Completed by ECD

Action	Cost
Fair Housing Matters Conference sponsorship	\$1,700
ECD staff attended training session for grantees facilitated by West TN Legal Services	\$500
Continually provide "Fair Housing Equal Opportunity for All" brochure to program beneficiaries and the AI Executive Summary; monitor subrecipients to ensure compliance.	\$250
Website redesigned and fair housing section is easier to find.	\$200

Continue to monitor subrecipients for compliance with Fair Housing and Equal Opportunity, utilizing Fair Housing and Equal Opportunity checklists.	\$250
Training on Fair Housing was incorporated into the Grantee Workshop held in the fall of 2014. ECD and THDA are planning to expand this during the next fiscal year and have been working on an MOU with the TN Fair Housing Council. Additionally, a training will be conducted in W TN for those grantees and will be facilitated by W TN Legal Services and attended by ECD staff.	\$500
New materials were sent to grantees and grant administrators to help them plan new Fair Housing activities.	\$500
ECD conducted training for grant administrators. Additional training for grantees is being planned on a regional level for elected officials. Several communities held training sessions at the local level for elected officials.	\$500
ECD has looked into making the existence of fair housing ordinances, resolutions or policies a threshold requirement, but it has not become a program component at this time. It will be discussed at the Public Meeting for the next program year.	\$200
ECD promotes Fair Housing Month and encourages grantees to attend one of the trainings. Additional materials to help develop a FH activity were sent to grantees during FH Month. A Memorandum of Understanding is being developed so that additional training for grantees can be implemented in the next program year.	--
Assisted grantees in W TN in planning a session to be held in the coming program year to be facilitated by W TN Legal Services. It was determined that regional trainings would be the most beneficial and most likely to be attended. After that session, that ECD will attend, ECD will determine how to proceed with additional trainings. Trainings have been held at the local level for commissions in several communities as well.	\$200
FH training was incorporated in the Grantee Workshop held in the fall of 2014. This will continue. An MOU is being developed with the TN Fair Housing Council to increase the training for the grantees in the coming year. New materials were sent to grantees to help them develop FH activities and they were notified of the dates of the FH conferences in each region.	--
ECD continues to approve each project for grantees. There have been additional reporting requirements for these activities that ensure each activity is tied to an impediment in the AI. We have started a list of pre-approved activities that will be distributed to grantees in the next program year. Each grantee is monitored for compliance.	\$400
Total FY 2014-15	\$5,200

2. Tennessee Housing Development Agency (THDA), HOME and ESG Programs

THDA has participated in the planning for a statewide AI with the Consolidated Partners and assisted with the development of a timeline to complete the AI and a statewide Fair Housing Plan. THDA is also responsible for providing updates on the state's progress through Consolidated Planning documents, such as the Annual Action Plan and CAPER, and has provided periodic updates on progress as requested by FHEO. Aside from participating in the development of the AI and the state-wide Fair Housing Plan,

THDA engages in a number of fair housing activities through the HOME and ESG programs, as well as other programs administered by THDA that are included in this report.

HOME Program Requirements detailed in the HOME Program Description state that “no person in the United States shall on the grounds of race, color, religion, sex, familiar status, national origin, age or disability be excluded from participation, denied benefits or subjected to discrimination under any program funded in whole or in part by HOME funds.” The Program Description also details federal requirements as set forth in 24 CFR 5.105(a) that are applicable to HOME projects and include: 24 CFR Part 100, 24 CFR Part 107, 24 CFR Part 1, 24 CFR Part 146, 24 CFR Part 8, 24 CFR Part 6, 42 USC §12101 *et seq.*, 24 CFR Parts 5, 200, 203, 236, 400, 570, 574, 882, 891 and 982, and 24 CFR Part 135. The HOME Operations Manual further discusses applicable federal laws, executive orders and regulations that pertain to fair housing and equal opportunity. THDA HOME grantees must comply with each of the federal laws, executive orders and regulations detailed in Chapter 6, Section 2.1 of the HOME Operations Manual.

Local programs are also required to adopt affirmative marketing procedures and requirements, which must be approved by THDA prior to any HOME funds being committed to a rental or homebuyer project of five or more units. One requirement of affirmative marketing is detailing the methods for informing the public, owners and potential tenants about fair housing laws and the local program’s policies.

In addition to meeting all requirements of the HOME Program Description and HOME Operations Manual, grantees have certain responsibilities to ensure protected persons or groups are not denied benefits. Responsibilities of grantees, which are undertaken throughout the progress of the projects, are outlined in Chapter 6, Section 3 of the HOME Operations Manual. In addition, the HOME Operations Manual requires certain activities of grantees and include: a minimum of one fair housing activity, which includes distribution of the *Fair Housing Equal Opportunity for All* pamphlet to each program applicant, Section 3 activities and documentation, creation and distribution of a policy of nondiscrimination, Equal Opportunity requirements in construction-generated employment, minority and female solicitation, Section 504 requirements, site and neighborhood standards and consideration of fair housing and local zoning ordinances.

Grantees are required to maintain records of their actions for FHEO monitoring purposes, including advertisements for employment and documentation of subsequent applications and individuals hired. An extensive list of recordkeeping requirements are found in Chapter 6, Section 5 of the HOME Operations Manual. Grantees are monitored during the duration of a project and an Equal Opportunity/Fair Housing/Title VI checklist is used by program monitors to determine compliance with requirements, responsibilities, activities and recordkeeping. This checklist also contains questions regarding complaints filed and any indications of Equal Opportunity and Fair Housing policy violations.

HOME Recipients attend the HOME Workshop, which includes a session dedicated to fair housing, each year at THDA’s headquarters. Training for HOME grantees included fair housing basics, fair housing law, how to identify fair housing issues and ways to make the public and clients aware of fair housing and ways to affirmatively further fair housing. The training is attended by HOME administrators located throughout the state. Supplemental fair housing information is provided in the HOME Operations Manual, which is available to the public on THDA’s website.

THDA provides a template for the rehabilitation and construction contracts to be used by our grantees/administrators that includes Relocation under URA and EO/FH (Section II- Applicable Laws and

Regulations), and a requirement to follow Section 3 requirements (Section III). During monitoring, we check for the Equal Opportunity poster and for solicitation of minority and female contractors within in the county and in the surrounding counties. Each administrator must submit the Contractor/Subcontractor Activity Report annually for reporting in the HOME APR.

As detailed in the ESG Program Description, all ESG recipients must perform and document action in the area of enforcement and promotion to affirmatively further fair housing. During the grant year, recipients must carry out a minimum of one activity to promote fair housing. Nondiscrimination and equal opportunity laws are also applicable to ESG programs and recipients. The ESG Program Manual requires all grantees to make facilities and services available to all persons and families on a nondiscriminatory basis. Publicity surrounding the availability of shelter facilities should reach all persons regardless of handicap, race, color, religion, sex, age, familial status or national origin. Grantees must also establish additional procedures to disseminate information to those interested in handicap accessible services and facilities. Additionally, grantees are required to give each participant a "Fair Housing for All" brochure. Information regarding fair housing requirements and activities can be found in the ESG Program Guidelines and the ESG Program manual, which is available to the public on THDA's website.

Other THDA programs also engage in fair housing activities similar to those of the ESG and HOME Program. Tennessee's AI and our Action Plan both discuss a significant need of education around Fair Housing. Through multiple efforts, THDA supports the availability and accessibility of fair housing education across the state. Each year, THDA hosts the annual "Peer Session" for education providers of THDA's Homebuyer Education Initiative (HBEI). HBEI agencies providing education to potential homebuyers use the *Realizing the American Dream* manual and deliver training on the Fair Housing Act through multiple curriculum components. The manual used by HBEI agencies covers the rights of potential borrowers or homeowners and helps them identify fair housing issues through examples. Information is provided regarding the Equal Credit Opportunity Act, Truth in Lending Act, Fair Credit Billing Act, Fair Credit Reporting and the Fair Debt Collection Practices Act. Homebuyer education is required for THDA loan programs that provide down payment assistance (Great Choice and New Start) and is voluntary for THDA's other loan programs. The cost of homebuyer education used in conjunction with a THDA loan is paid by THDA. During the reporting period, THDA expended \$463,650 to support the Homebuyer Education Initiative.

Each year, THDA hosts the Tennessee Governor's Housing Conference (formerly the TN Governor's Housing Summit), a two-day event that provides informational sessions to affordable housing professionals on topics related to providing safe, sound and affordable housing opportunities for Tennesseans. In 2014, a specific session, *Fair Housing in Tennessee*, provided an overview of fair housing issues, including recent changes to the eviction process and how some states are changing state law regarding the use of testers. The session featured guest speakers Carol Gish, Managing Attorney at West Tennessee Legal Services, and Tracey McCartney, Executive Director of the Tennessee Fair Housing Council.). This is one of the largest affordable housing conferences in the State of Tennessee and is attended by both THDA staff, sub-recipients and other persons interested in or working to provide affordable housing in Tennessee.

Additionally, many THDA staff members attend other fair housing or nondiscrimination training throughout the year. Resources to attend this training come from THDA's training budget. Nondiscrimination training is provided by a variety of organizations including: HUD, West Tennessee Legal Services, the Tennessee Fair Housing Council, Tennessee Human Rights Commission, Tennessee

Association of Housing and Redevelopment Agencies, National Council on State Housing Agencies. Examples of training and events attended by staff members of THDA during FY 2014-15 are described in the following table.

Table 46
FY 2014 - 15 Nondiscrimination Training

Event/Host, Location and Date	Number of THDA Participants	THDA Attendee Cost
"A Study in Predatory Lending, The Fair Housing Act, and Rights and Remedies", Chattanooga, TN, September 19, 2014	1	\$154 (staff time) \$32 (registration)
East Tennessee Accessibility Symposium, Knoxville, TN, October 3, 2014	1	\$196 (staff time) \$50 (registration)
Governor's Housing Summit (organized by THDA), Nashville, TN, Affirmatively Furthering Fair Housing, Renter's Rights & Fair Housing Session, September 3, 2014	Not collected	Not collected
"Fair Lending Abuse and Mortgage Lending" and "Affirmatively Furthering Fair Housing" (organized by the THRC) NCRC Training, November 13 -14, 2014.	1	\$420 (staff time)
"AFFH Training" (organized by the TN Fair Housing Council), Franklin, TN, December 2, 2014	2	\$420 (staff time)
"Fair Housing and Domestic Violence", Memphis, Nashville, Knoxville, TN, February 24, 25, 26, 2015	3	\$336 (staff time)
"Fair Housing Update" – TN Day on the Hill, Nashville, TN, February 25, 2015	3	\$1,259 (staff time)
2015 Tennessee Fair Housing Matters Conference, Nashville, TN, April 7, 2014	30	\$6,296 (staff time) \$2,250 (registration)
West TN Fair Housing Council CELEBRATION, Memphis, TN, April 10, 2014	4	\$839 (staff time) \$100 (registration)
ECHO Spring Fair Housing Conference, Knoxville, TN, April 17, 2015	4	\$839 (staff time) \$260 (registration)
"Fair Housing for People with Disabilities" Chattanooga, Knoxville, Nashville, TN, June 2, 3, 4, 2015	Not collected	Not collected
National Council of State Housing Finance Agencies, HCC, Los Angeles CA, "Fair Housing Development in Practice" and "Site Visit Strategies", June 3, 2015	3	\$3,148 (staff time) \$1,710 (registration)

THDA also helps to sponsor Fair Housing events/training across the state either through in kind donations of gifts and supplies or cash donations to help fund the event/training. The sponsorships for events occurring in fiscal year are summarized in Table 47.

Table 47
THDA Fair Housing/Nondiscrimination Event Hosting

Event/Host, Location and Date	Cost of Sponsorship
“A Study in Predatory Lending, The Fair Housing Act, and Rights and Remedies”, Chattanooga, TN , September 19, 2014	\$100
East Tennessee Accessibility Symposium, Knoxville, TN, October 2014	\$1,000
HEAT Registration/Partnership, January 2015	\$100
“Fair Housing and Domestic Violence” – Memphis, Nashville, and Knoxville, February 2015	\$100
“Fair Housing Update” – TN Day on the Hill, Nashville, TN, February 2015	<i>Portion of the \$15,000 coalition support</i>
2014 Tennessee Fair Housing Matters Conference, Nashville, TN, April 2015	\$1500 (gifts/materials)
West TN Fair Housing Council CELEBRATION, Memphis, TN, April 2015	\$100 (gifts/materials)
ECHO Spring Fair Housing Conference, Knoxville, TN, April 2015	\$700 (gifts/materials)
“Fair Housing for People with Disabilities” – Chattanooga, Knoxville, and Nashville, TN, June 2015	\$100

In addition to the above sponsorships, THDA provides \$5,000 annually to the Tennessee Affordable Housing Coalition which supports regular meetings and the planning and implementation of the Tennessee Housing Day on the Hill event. During this event in spring 2014, there was a fair housing training for attendees which span across different fields within affordable housing and included participants from across the state.

Additionally through funds from THDA, Southeast Tennessee Development District committed \$800 in order for staff to attend fair housing training events and workshops sponsored by THDA, TNECD, USDA Rural Development, TN Development District Association, and other recognized fair housing training opportunities. Memphis Area Association of Government committed \$1200 so that staff could work with the Fair Housing Alliance of Greater Memphis in promoting and participating in the Neighborhood Redevelopment Conference. This conference was held in April. These funds came from the THDA technical assistance grant awarded to the development districts for services directed toward assisting local government and non-profit entities in the development, application, implementation, and/or furthering of affordable housing for very low-income households in Tennessee.

THDA redesigned their website during FY 2014-15 and included an update of the Fair Housing and Title VI Compliance sections of THDA’s website. The webpages include a general overview of Title VI and the Fair Housing Act, fair housing legislation, examples of housing discrimination, fair housing resources and procedures for filing a fair housing complaint with HUD’s Office of Fair Housing and Equal Opportunity or the Tennessee Human Rights Commission (THRC).

THDA also continues to examine and improve the Limited English Proficiency policies and procedures. The LEP policies and procedures provide guidelines for THDA staff who encounter individuals whom may

have difficulty understanding or speaking English. The procedures help to ensure that resources or services are effectively provided to individuals with limited English proficiency. THDA staff also has a system to track LEP encounters and continues to utilize the telephone-based AVAZA language interpreting service. THDA trained relevant staff members and implemented the language line in October, 2011. Avaza Language Services can be contacted at:

Avaza Language Services
5209 Linbar Drive, Suite 603
Nashville, TN 37211
(615) 534-3404

THDA translates public notices and documents for public comment to Spanish, Arabic, Bosnian, Behdini, Somali, and Sorani and is working to increase the availability of non-federal program documents in Spanish. THDA also publishes its public notices in four Spanish newspapers (at least one in each Grand Division of Tennessee) to promote public participation among Spanish speaking persons. THDA's website is convertible to over 90 languages using Google Translator technology. Persons seeking information about THDA may click on the "Powered by Google Translate" drop down button to translate the majority of the website's content to the language of their choice.

THDA's Executive Director serves on the Tennessee Council on Developmental Disabilities and THDA's Director of Research and Planning serves on the Tennessee Department of Mental Health and Substance Abuse Services, Mental Health Policy and Planning Council. These meetings are regularly attended by the Director of Research and Planning (the Executive Director's designee for the former) and help ensure that THDA's efforts are known by the disability and mental health communities. Also, THDA's Chief Strategy Officer serves on the Tennessee No Wrong Door Advisory Board. Chaired by the Tennessee Commission on Aging and Disability, this group develops strategies to enable streamlined access to healthcare, information and human supports for older adults and adults with disabilities. The agency's role on these councils keeps our program directors informed of emerging and persistent issues around housing for the populations served.

During this reporting period, THDA's Chief Strategy Officer coordinated a four-state (Tennessee, Virginia, North Carolina, and Kentucky) meeting among housing finance agencies (HFAs) to discuss how states are addressing special needs populations in housing. Specifically, the agenda included a discussion of the states' experiences with Olmstead and best practices with using Money Follows the Person (MFP) funds to provide housing. Additionally, the meeting focused on permanent supportive housing and attendees shared their experiences with capacity, HFA's role in working with these populations, what resources are available, and the potential for the Federal Housing Trust Fund to support these efforts.

Also during FY2015, THDA sponsored a Fair Housing intern through a grant with Tennessee State University to assist with projects related to LEP and national origin within Tennessee. We attempted to develop a plan to identify geographic areas within the state with LEP populations to focus outreach to those communities during 2015-2016. Identification of these populations within local service areas would have allowed us to assist with sub-recipient Title VI monitoring, marketing and outreach activities. Unfortunately, our efforts were not successful on the city and county wide levels and we pended the project until we could gather assistance from other state agencies that focus on local delivery of services. Additionally, THDA has taken actions to improve citizen participation in the design and implementation of the Consolidated Plan programs. As a result of the meeting, THDA intends to develop a standard procedure during fiscal year 2015-16 for all programs to solicit comments from

protected classes. In 2013-1014, THDA created an email outreach list that sends emails to organizations who serve or represent protected classes when public review/comment is required for program changes. The list was created to ensure that organizations that serve a protected class are specifically notified on public comment periods. After the email outreach was launched, comments are frequently received from recipients on the list for both of the comment periods conducted.

Each year, THDA, in accordance with the state's Citizen Participation Plan, posts public notices regarding the Consolidated Plan and other THDA administered programs in newspapers serving the largest population centers in the State and by making the notices available in electronic format. The following tables shows the public notices during FY 2014-15 and the associated costs.

**Table 48
FY 2014-15 Public Notice Expenditures**

Consolidated Plan FY 2015-19 & Action Plan FY 2015-16	
Paper Name	Cost
Chattanooga Times Free Press	\$269.76
Clarksville Leaf Chronicle	\$269.57
Jackson Sun	\$317.36
Johnson City Press	\$100.44
Knoxville News Sentinel	\$366.51
Memphis Commercial Appeal	\$1,818.00
Nashville Tennessean	\$1,088.92
The Daily Herald	\$103.50
The Herald-Citizen	\$76.38
The State Gazette	\$130.05
La Campana	\$425.00
La Prensa Latina	\$356.00
Noticias Libres	\$104.00
El Crucero De Tennessee	\$400.00
TFLI-Public Notice Translation-Spanish, Arabic, Bosnian, Behdini, Somali, Sorani	\$460.00
Subtotal	\$6,285.49
CAPER FY 2013-14	
Chattanooga Times Free Press – Spanish Version	\$99.83
Chattanooga Times Free Press – English Version	\$73.62
The Leaf Chronicle – Spanish Version	\$122.01
The Leaf Chronicle – English Version	\$88.03
The Jackson Sun – English Version	\$111.67
The Jackson Sun – Spanish Version	\$145.00
Johnson City Press – English & Spanish Versions	\$129.30
Knoxville News Sentinel – English Version	\$109.23
Knoxville News Sentinel – Spanish Version	\$155.03
The Commercial Appeal – Spanish Version	\$506.67
The Commercial Appeal – English Version	\$378.67
The Tennessean – Spanish Version	\$516.13
The Tennessean – English Version	\$372.40
TFLI-Public Notice Translation-Spanish, Arabic, Bosnian, Behdini, Somali, Sorani	\$626.00
Subtotal	\$3,433.59
Total Expenditures	\$9,719.08

3. Tennessee Department of Health

HOPWA is involved in a number of fair housing initiatives that positively impact HOPWA grantees and beneficiaries both directly and indirectly. Title II of the ADA prohibits discrimination against persons with disabilities in all services, programs and activities made available by state and local governments. HOPWA project sponsors are required to comply with anti-discrimination legislation including The Americans with Disabilities Act, Title VI and the Fair Housing Act. Title II of the ADA directly influences neighborhoods where minimal public investment has led to poor living standards. HOPWA funds are made available to help upgrade and transform these neighborhoods. Upgrades are often made to make public housing safer and to make more units available for homeless and disabled populations. The majority of HOPWA funds are used for Supportive Services in Tennessee, which include: health and mental health assessment; drug and alcohol abuse treatment; counseling; day care; nutritional services; intensive care when required; and assistance in gaining access to local, state and federal government benefits and services. Although the Supportive Services category does not emphasize housing assistance (which is covered in other service categories including Housing Information Services, the Short-Term Rent, Mortgage and Utility Payment Program and the Permanent Housing Placement Program) all funds in the Supportive Services category are used to assist HOPWA beneficiaries regardless of race, color, religion, national origin, disability and familial status. In regards to the delivery of services through the Housing Information Services, Short-Term Rent, Mortgage and Utility Payment Program and the Permanent Housing Placement Program, both HOPWA and Service Providers comply with all fair housing and anti-discrimination laws. Additionally, HOPWA is involved with job fairs, which promote fair housing practices and training, including issues regarding lead paint and other safety factors that may impede the health of residents.

Section D.8. of HOPWA's contract with providers contains anti-discrimination conditions. It states that no person will be excluded from participation, denied benefits or subjected to discrimination in the performance of the grant contract or in the employment practices of the grantee on the grounds of handicap or disability, age, race, color, religion, national origin or any other classification protected by Federal or Tennessee State constitutional or statutory law. Grantees are required to show proof of nondiscrimination upon request and must post notices of nondiscrimination.

HOPWA is continuing to review its contracts with project sponsors and program materials to strengthen language surround fair housing. HOPWA staff is also interested in learning more about furthering fair housing through HOPWA activities and becoming more involved in fair housing activities taking place throughout Tennessee, including the Tennessee Fair Housing Matters conference being held each year.

4. Collaborative Activities Conducted by the Consolidated Partners

Although each agency conducts activities tailored to the programs it administers throughout the year, the Consolidated Partners came together throughout the reporting period to plan and develop ways to improve fair housing activities and fulfill the State's obligation to affirmatively further fair housing. As previously mentioned, the Consolidated Partners met periodically to develop and complete the AI. Additionally, the Consolidated Partners have continued to collaborate not only with one another but also with other state agencies.

The Consolidated Partners will continue to work together in FY 2015-16 to complete some of the activities that were started in FY 2014-15. During the reporting period, the Consolidated Partners continued developing a statewide Fair Housing Plan, which was first presented in the FY 2013-14 Annual

Action Plan and was based off of the draft AI. An updated Fair Housing Plan, based on the final AI, was included in the FY 2014-15 Annual Action Plan. The Fair Housing Plan will continue to be used by the Consolidated Partners to adjust both agency and collaborative fair housing activities to overcome the barriers and impediments to fair housing choice that are identified in the AI. The Consolidated Partners anticipate meeting regularly to discuss and address the recommendations of the AI and track the progress of the statewide Fair Housing Plan that covers the delivery of services through the four formula programs. The Consolidated Partners realize the process will take time and are committed to improving their processes and procedures in regards to fair housing. The Fair Housing Plan, as presented in the FY 2014-15 Annual Action Plan, can be found in Appendix F and highlights actions accomplished during the reporting period.

IX. ADDITIONAL INFORMATION AND FUTURE ACTIONS

A. Public Participation and Public Comments

Each year, the State of Tennessee provides a summary of the CAPER on THDA, Tennessee Department of Economic and Community Development, and the Tennessee Department of Health's websites and on each of the nine Development District websites for citizen review. Social media is also used to engage public participation. Citizens may access the summary and a public comment forum on THDA's website. Instructions for viewing and commenting on the summary are included in the summary and in a public notice that is published in both English and Spanish in newspapers throughout the state. This year, the notice was published in fourteen newspapers in both English and/or Spanish. The names of the publications in which the notices appear are:

- Memphis Commercial Appeal
- The Tennessean
- The Daily Herald (Columbia)
- The Herald – Citizen (Cookeville)
- The State Gazette (Dyersburg)
- Chattanooga Times Free Press
- The Leaf Chronicle (Clarksville)
- The Jackson Sun
- Johnson City Press
- The Knoxville News Sentinel
- Noticias Libres (Chattanooga)
- Mundo Hispano Bilingual (Knoxville)
- La Prensa Latina (Memphis)
- El Crucero de Tennessee (Nashville)

The notice was published on Wednesday, August 12, 2015. The summary and the public comment forum were made available on THDA's website through September 10, 2015, which meets the requirements set forth in the State of Tennessee's Citizen Participation Plan.

During the public comment period, no public comments were received for the FY 2014-15 CAPER. In an effort to solicit comments from residents, the consolidated planning partners followed Tennessee's Citizen Participation Plan and increased our promotion of the CAPER at different affordable housing

boards, forums, and meetings during the public comment period. Appendix G shows the state's public participation and public comments efforts.

B. Future Actions

The State of Tennessee will continue to administer the four formula programs covered in the Five-Year Consolidated Plan and work towards the goals set forth in the four priority areas. While the priority areas represent longer term goals, the Action Steps represent actions the four formula programs seek to carry out annually, in order to reach longer term goals. The State of Tennessee will also continue to work with local public housing authorities, as they work to adopt their long-term plans to determine their plan's consistency with the State's Consolidated Plan.

The State recently completed the 2015 – 2019 Five-Year Consolidated Plan which was entered and submitted to HUD through IDIS. HUD has approved this plan. The Consolidated Partners will continue to collaborate on addressing housing related issues, including fair housing, while meeting specific housing and community needs. The four agencies will also continue to complete the Annual Action Plan, which states the intentions and goals of each program for the following fiscal year.

In regards to reporting, the administering agencies will continue to report on the activities of the CDBG, HOME, ESG and HOPWA programs. The Consolidated Partners have already participated in a number of webinars hosted through HUD's E-Con Planning Suite and will continue to participate throughout the year. The Consolidated Partners will continue to follow the progress and educate themselves on the new Consolidated Planning tools.

The Consolidated Partners intend to make significant progress in fair housing. Each agency recognizes their obligations to further fair housing in Tennessee. The completion of the AI and the subsequent statewide Fair Housing Plan are the first steps in working to identify and overcome impediments and barriers to fair housing in the state. The Consolidated Partners will continue to make efforts in the area of fair housing over the coming year and will update HUD and FHEO as goals are met.

Although the State is not involved in providing direct services through the four formula programs, the State is responsible for ensuring funds are made available to local government and non-profit agencies throughout Tennessee that are capable of delivering services to local communities and individuals in need. While the State of Tennessee has identified specific target areas and community development and affordable housing goals, communities have the flexibility to use funds to reach their populations most efficiently and effectively. The State will continue to ensure funds from the four formula programs are used in a manner that is consistent with the Consolidated Plan, targets those who need assistance the most, and provides for the completion of community development and affordable housing goals.

STATE OF TENNESSEE
FY 2014-15 CONSOLIDATED ANNUAL PERFORMANCE AND EVALUATION REPORT
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