

Tennessee Housing Development Agency (“THDA”)

HOME-ARP Allocation Plan

Guidance

- *To receive its HOME-ARP allocation, a PJ must:*
 - *Engage in consultation with at least the required organizations;*
 - *Provide for public participation including a 15-day public comment period and one public hearing, at a minimum; and,*
 - *Develop a plan that meets the requirements in the HOME-ARP Notice.*
- *To submit: a PJ must upload a Microsoft Word or PDF version of the plan in IDIS as an attachment next to the “HOME-ARP allocation plan” option on either the AD-26 screen (for PJs whose FY 2021 annual action plan is a Year 2-5 annual action plan) or the AD-25 screen (for PJs whose FY 2021 annual action plan is a Year 1 annual action plan that is part of the 2021 consolidated plan).*
- *PJs must also submit an SF-424, SF-424B, and SF-424D, and the following certifications as an attachment on either the AD-26 or AD-25 screen, as applicable:*
 - *Affirmatively Further Fair Housing;*
 - *Uniform Relocation Assistance and Real Property Acquisition Policies Act and Anti-displacement and Relocation Assistance Plan;*
 - *Anti-Lobbying;*
 - *Authority of Jurisdiction;*
 - *Section 3; and,*
 - *HOME-ARP specific certification.*

Participating Jurisdiction: Tennessee Housing Development Agency (THDA) on behalf of the State of Tennessee

Original Plan Submission Date: September 9, 2022

2023 Amendment Submission Date: September 30, 2023

2026 Amendment Submission Date: <insert>

Consultation

Before developing its plan, a PJ must consult with the CoC(s) serving the jurisdiction’s geographic area, homeless and domestic violence service providers, veterans’ groups, public housing agencies (PHAs), public agencies that address the needs of the qualifying populations, and public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities, at a minimum. State PJs are not required to consult with every PHA or CoC within the state’s boundaries; however, local PJs must consult with all PHAs (including statewide or regional PHAs) and CoCs serving the jurisdiction.

Summarize the consultation process:

THDA's Response (Original Plan):

THDA's consultation process was conducted in two separate manners. Between the two methods of consultation, THDA reached approximately 100 different agencies.

#1 - Survey:

THDA created and distributed a needs assessment survey to the Continuum of Care Agencies, Emergency Solutions Grants (ESG) Grantees, and other affordable housing partners to collect data and other feedback to better understand the needs of the service providers working alongside residents of the State of Tennessee. Please see Appendix A for a table of organizations that gave feedback.

#2 – Public Hearing:

THDA also conducted a remote Public Hearing session via WebEx with stakeholders from each of the recommended entities. The organizations consulted at the Public Hearing are included in the table below. Please see Appendix B for comments received, THDA's responses, and the Notice of Public Hearing.

List the organizations consulted, and summarize the feedback received from these entities.

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Holladay Ventures	Community- based, affordable Housing	Remote Meeting	See Appendix B
Crossville Housing Development Corp	PHA	Remote Meeting	See Appendix B
I Am Recovery	Community- based, transitional housing	Remote Meeting	See Appendix B
Aim Center	Supportive Services	Remote Meeting	See Appendix B
WRAP	Supportive Services	Remote Meeting	See Appendix B
Dismas House	Community- based, housing Provider	Remote Meeting	See Appendix B
End Slavery Tennessee	Community- based, human trafficking housing Provider	Private remote meeting	No feedback provided.

Sparta Housing	PHA	Remote Meeting	No feedback provided.
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Public Participation

*PJs must provide for and encourage citizen participation in the development of the HOME-ARP allocation plan. Before submission of the plan, PJs must provide residents with reasonable notice and an opportunity to comment on the proposed HOME-ARP allocation plan of **no less than 15 calendar days**. The PJ must follow its adopted requirements for “reasonable notice and an opportunity to comment” for plan amendments in its current citizen participation plan. In addition, PJs must hold **at least one public hearing** during the development of the HOME-ARP allocation plan and prior to submission.*

For the purposes of HOME-ARP, PJs are required to make the following information available to the public:

- *The amount of HOME-ARP the PJ will receive,*
- *The range of activities the PJ may undertake.*

Describe the public participation process, including information about and the dates of the public comment period and public hearing(s) held during the development of the plan:

THDA’s Response (Original Plan):

- HOME-ARP Needs Assessment Survey: start date 5/26/2022 - end date 6/9/2022
- Public comment period: start date 7/12/2022 - end date 7/31/2022
- Public hearing: 7/12/2022

Over one hundred organizations across Tennessee were sent the HOME-ARP Needs Assessment survey via email, and the interest generated was positive. THDA received fifty-nine (59) survey responses and comments.

Seventy-three (73) organizations throughout Tennessee participated in the public hearing on July 12, 2022. During the public comment period, THDA received six comments.

THDA’s Response (2023 Substantial Amendment):

- Public comment period: start date 08/04/2023 - end date 08/19/2023
- Public hearing: 08/22/2023

THDA’s Response (2026 Substantial Amendment):

- Public comment period: start date 07/08/2026 - end date 08/07/2026
- Public hearing: 07/30/2026

Describe any efforts to broaden public participation:

THDA’s Response (Original Plan):

THDA staff followed up on incomplete survey responses and sent out reminders to the agencies that were sent the survey. Additionally, numerous emails were sent to our Grantees to make them aware of the Public Comment period and WebEx public hearing date. THDA also placed the Public Comment information on our webpage and sent out mass communications to numerous nonprofit agencies across the state.

A PJ must consider any comments or views of residents received in writing, or orally at a public hearing, when preparing the HOME-ARP allocation plan.

Summarize the comments and recommendations received through the public participation process:

THDA's Response (Original Plan):

See Appendix B for summarized comments and recommendations received through the public consultation process.

THDA's Response (2023 Substantial Amendment):

No comments were received.

THDA's Response (2026 Substantial Amendment):

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Summarize any comments or recommendations not accepted and state the reasons why:

THDA's Response (Original Plan):

All comments and recommendations were taken into consideration. Please see Appendix B for responses.

THDA's Response (2023 Substantial Amendment):

No comments were received.

THDA's Response (2026 Substantial Amendment):

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Needs Assessment and Gaps Analysis

PJs must evaluate the size and demographic composition of qualifying populations within its boundaries and assess the unmet needs of those populations. In addition, a PJ must identify any

gaps within its current shelter and housing inventory as well as the service delivery system. A PJ should use current data, including point in time count, housing inventory count, or other data available through CoCs, and consultations with service providers to quantify the individuals and families in the qualifying populations and their need for additional housing, shelter, or services. The PJ may use the optional tables provided below and/or attach additional data tables to this template.

OPTIONAL Homeless Needs Inventory and Gap Analysis Table

Homeless													
	Current Inventory					Homeless Population				Gap Analysis			
	Family		Adults Only		Vets	Family HH (at least 1 child)	Adult HH (w/o child)	Vets	Victims of DV	Family		Adults Only	
	# of Beds	# of Units	# of Beds	# of Units	# of Beds					# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	983	294	2425	NA	11								
Transitional Housing	501	151	1131	NA	346								
Permanent Supportive Housing	1939	589	2504	NA	1247								
Other Permanent Housing						NA	NA	NA	NA				
Sheltered Homeless						1112p 337u	3328 3299	424	541				
Unsheltered Homeless						471p 173u	2313 2149	146	323				
Current Gap										-99	-65	-2085	NA

Suggested Data Sources: 1. Point in Time Count (PIT); 2. Continuum of Care Housing Inventory Count (HIC); 3. Consultation

OPTIONAL Housing Needs Inventory and Gap Analysis Table

Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
Total Rental Units	#		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	#		
Rental Units Affordable to HH at 50% AMI (Other Populations)	#		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		#	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		#	
Current Gaps			#

Suggested Data Sources: 1. American Community Survey (ACS); 2. Comprehensive Housing Affordability Strategy (CHAS)

THDA's Response:

THDA elected not to collect or report data in optional Housing Needs Inventory and Gap Analysis Table. However, a detailed description of housing needs in Tennessee can be found below.

Describe the size and demographic composition of qualifying populations within the PJ's boundaries:

THDA's Response:

The following section describes the size and demographic composition of HOME-ARP qualifying populations in the State of Tennessee. The most complete state-wide information is available for Qualifying Population 1, those experiencing homelessness. State-wide data regarding size is available for Qualifying Population 2, those at-risk of homelessness, although demographic data is not. State-wide information regarding size is also available for Qualifying Population 3, those fleeing domestic/sexual violence, and Qualifying Population 5, veterans, as related to experiencing homelessness. Finally, state-wide data is incomplete for Qualifying Population 4, otherwise vulnerable populations, although the State has attempted through consultation to gain some useful data on this population.

Qualifying Population 1 (QP 1):

HOME-ARP's Qualifying Population 1 is households who are homeless, as defined in section 103(a) of the McKinney-Vento Homeless Assistance Act, as amended (42 U.S.C. 11302(a)) ("McKinney-Vento").

QP 1: State-wide Size and Need in 2020*

The Homeless Needs Inventory and Gaps Analysis table above reports Tennessee's gap in available beds/units for people experiencing homelessness in Tennessee, according to the State's 2020 Housing Inventory Count (HIC), as well as the number of people known to be experiencing sheltered or unsheltered homelessness, according to the State's 2020 Point in Time (PIT) Count. The table enumerates the number of beds/units for family households and individual adult households in emergency shelter, transitional housing, and permanent supportive housing. The table then compares the capacities of these resources with the number of people known to be in need. Since the State's PIT Count data does not include people sheltered in permanent supportive housing units, the table's "gap analysis" represents the gap between HIC inventory and PIT Count need related to emergency shelter and transitional housing only. The analysis shows shelter inventory in 2020 was inadequate to meet the needs of people known to be experiencing homelessness at that time.

QP 1: Regional Size and Need in 2020*

A regional gap analysis, similar to the state-wide analysis above, revealed differences in need across Tennessee's Continuum of Care (CoC) regions. Emergency shelter and

transitional housing inventory was inadequate to meet the needs of families known to be experiencing homelessness in the following CoC regions:

CoC:	Gap in Family Beds:	Gap in Family Units:
TN-500: Chattanooga/SE TN	-71	-25
TN-503: Central TN	-35	-28
TN-507: Jackson/West TN	-345	-130

The regional gap analysis revealed emergency shelter and transitional housing inventory was inadequate to meet the needs of adult individuals known to be experiencing homelessness in all of the State's CoC regions. Need was most acute in the following CoC regions:

<u>CoC:</u>	<u>Gap in Individual Adult Beds:</u>
TN-500: Chattanooga/SE TN	-333
TN-504: Nashville/Davidson County	-583
TN-507: Jackson/West TN	-478
TN-510: Murfreesboro/Rutherford Co.	-184
TN-512: Morristown/Blount, Sevier...	-246

QP 1: State-wide Emergency Shelter & Transitional Housing Inventory in 2021

The State's 2021 HIC data reported an overall increase of 369 emergency shelter/safe haven/transitional housing beds from 2020's HIC data. Beds allocated to individual adults were increased most, perhaps to address the need of the individual adult population in the 2020 data. Beds allocated for families decreased slightly across the state. The shift of resources toward adults from families may reflect changes service providers made to meet fluctuating needs during the COVID-19 pandemic. Despite the overall increase in shelter beds in 2021, however, service providers across Tennessee still report unmet needs via THDA's 2022 HOME-ARP Needs Assessment Survey. Service providers note current need for non-congregate shelter in some regions, especially rural areas, as well as supportive services and access to affordable housing in all regions. Please see the next section for more detailed descriptions of needs.

QP 1: Demographic Composition in 2020*

Here are the demographic compositions of people known to be experiencing homelessness, according to the State's 2020 PIT Count Data. The composition of Tennessee's general population, according to the 2020 Census, is provided for comparison to gauge which populations are overrepresented in Tennessee's homeless population.

Compared to Tennessee's general population, males were overrepresented in the homeless population in 2020.

	<u>Sheltered</u>	<u>Unsheltered</u>	<u>Gen Pop %</u>
Female:	1647 36.8%	955 34.3%	51.3%

Male:	2127	62.9%	1824	65.5%	48.7%
Transgender/Nonconforming:	8	0.2%	5	0.2%	not measured
Total:	4472	100.0%	2784	100.0%	100.0%

Compared to Tennessee's general population, people of Non-Hispanic / Non-Latino ethnicities were overrepresented in the homeless population in 2020.

	<u>Sheltered</u>		<u>Unsheltered</u>		<u>Gen Pop %</u>
Hispanic / Latino:	108	2.4%	80	2.9%	6.9%
Non-Hispanic / Non-Latino:	4364	97.6%	2704	97.1%	93.1%
Total:	4472	100.0%	2784	100.0%	100.0%

Compared to Tennessee's general population, people who are Black and/or African American were overrepresented in the homeless population. People who are white may be overrepresented in the unsheltered homeless population; however, the PIT Count data and the Census use different methodologies for representing racial demographics, specifically how people of Hispanic / Latino ethnicities are categorized racially, so these percentages may not be directly comparable.

	<u>Sheltered</u>		<u>Unsheltered</u>		<u>Gen Pop %</u>
Black / African American:	2050	45.8%	799	28.7%	12.4%
White:	2223	49.7%	1868	67.1%	61.6%
Asian:	19	0.4%	10	3.6%	6.0%
American Indian / Alaska Native:	36	0.8%	30	1.1%	1.1%
Native Hawaiian / Pacific Islander:	22	0.4%	8	0.3%	0.2%
Multiple Races:	122	2.7%	69	2.5%	10.2%
Some other race (Census only):					8.4%
Total:	4472	100.0%	2784	100.0%	100.0%

Qualifying Population 2 (QP 2):

HOME-ARP's Qualifying Population 2 is those who are at risk of homelessness, as defined in section 401 of McKinney-Vento.

QP 2: State-wide size in 2022

According to the National Low-Income Housing Coalition 2022 "The Gaps" Report, Tennessee has 233,311 Extremely Low Income (ELI) households, who have an income of less than 30% of Area Median Income. Nearly half of these households live in the Memphis or Nashville metro areas. Tennessee has a supply of 106,209 affordable and available rental homes, which means Tennessee needs an additional 127,102 affordable housing units to meet the need of ELI renters. 84% of ELI renters experience a housing cost burden, meaning they spend greater than 30% of their household incomes on rent. In addition, 67% of ELI renters experience a severe housing cost burden, meaning they spend greater than 50% of their household incomes on rent. Unfortunately, the State does not have exact information regarding the demographic characteristics of the Tennesseans included in these groups. However, NLIHC notes ELI renters nationally are more likely than those in the general rental population to be at least 62 years old and/or to have a

disability. In addition, 15% of ELI renters nationally are single adults who are caregivers to a young child or a household member with a disability; most of these ELI renters work part-time to balance caregiving responsibilities, which does not generate enough income to afford market rents without assistance. Finally, 20% of Black households, 18% of American Indian / Alaskan Native households, 15% of Latino households, and 10% of Asian households are ELI renters nationally, compared with only 6% of white, non-Latino households.

Qualifying Population 3 (QP 3):

HOME-ARP's Qualifying Population 3 is those who are fleeing, or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking.

QP 3: State-wide size in 2020*

The number of people fleeing or attempting to flee in Tennessee is only partially quantifiable with available data. Amongst Tennessee's known homeless population, 541 people in emergency shelter or transitional housing and 232 people experiencing unsheltered homelessness reported fleeing domestic violence, according to the State's 2020 PIT Count. The demographics of the people included in the PIT Count were unavailable. However, service providers consulted via the 2022 HOME-ARP Needs Assessment Survey report the population fleeing violence is mainly composed of women and their children.

Qualifying Population 4 (QP 4):

HOME-ARP's Qualifying Population 4 is those who are part of other populations where providing support services or assistance would prevent a family's homelessness or would serve those with greatest risk of housing instability.

QP 4: State-wide size and demographic characteristics in 2020

The definition of this population is broad and, therefore, difficult to quantify or describe demographically. Service providers, however, note a need for affordable and accessible housing for Tennesseans who are elderly, via THDA's 2022 HOME-ARP Needs Assessment Survey.

Fixed incomes, as well as deteriorating health and increasing experiences of disability, make elderly people at greater risk of homelessness than younger populations. Approximately one out of six Tennesseans are 65 years old, according to the 2020 Census.

Qualifying Population 5 (QP 5):

HOME-ARP's Qualifying Population 5 is those who are veterans and families that include a veteran family member that meet the criteria in (1)-(4) above.

QP 5: State-wide size in 2020*

Amongst Tennessee's known homeless population, 424 people in emergency shelter and transitional housing and 146 people experiencing unsheltered homelessness reported being a veteran, according to the State's 2020 PIT Count. The demographics of the veterans included in the PIT Count were unavailable.

*Note: The State strategically choose to report data from 2020's PIT Count because not all of the State's CoCs conducted a full count of unsheltered people experiencing homelessness in 2021 due to the COVID-19 pandemic. As a result, the 2021 data set is incomplete and provides a less consistent snapshot of homelessness compared to 2020.

Describe the unmet housing and service needs of qualifying populations, including but not limited to:

- ***Sheltered and unsheltered homeless populations;***
- ***Those currently housed populations at risk of homelessness;***
- ***Other families requiring services or housing assistance or to prevent homelessness; and,***
- ***Those at greatest risk of housing instability or in unstable housing situations:***

THDA's Response:

To gain a better understanding of the unmet housing and service needs of the HOME-ARP qualifying populations, THDA administered the 2022 HOME-ARP Needs Assessment Survey and held a public hearing on the Allocation Plan draft, inviting participants to submit comments via email regarding unmet needs and proposed allocation of funds. This section will first describe the insights gained from the survey, then the insights gained from the public hearing and emailed feedback.

The survey asked service providers and PHAs across Tennessee, as required in HOME-ARP's consultation process, for data about the HOME-ARP qualifying populations and descriptions of these populations' unmet needs. The survey also notified the entities of HOME-ARP's eligible activities and asked them to rank these activities in terms of importance to meeting the needs of the qualifying populations. This allowed THDA to appropriately allocate funds.

Here is a count of the entities invited to participate:

- PHAs: 84 invited
- Homelessness Service Providers: 24 invited
- Domestic Violence Service Providers: 6 invited
- Vulnerable Population Service Providers: 9 invited
- Veteran-specific Service Providers: 3 invited
- CoCs (regional): 2 invited
- Public agencies: 2 invited
- Public advocacy groups: 1 invited
- TOTAL: 131 entities invited

Here is the composition of complete or partially complete survey responses received:

- PHAs: 27 responses, 46% of respondents
- Homelessness Service Providers: 18 responses, 29% of respondents

- Domestic Violence Service Providers: 5 responses, 8% of respondents
- Vulnerable Population Service Providers: 4 responses, 7% of respondents
- Veteran-specific Service Providers: 1 response, 2% of respondents
- CoCs (regional): 2 responses, 3% of respondents
- Public agencies: 2 responses, 3% of respondents
- Public advocacy groups: 1 response, 2% of respondents
- TOTAL: 59 responses

Entities self-reported on the survey which HOME-ARP qualifying populations they served and provided data about these populations and descriptions of current resources available and unmet needs. For each qualifying population, THDA synthesized these responses into themes to describe the unmet needs for each qualifying population. Numbers in parentheses indicate the number of entities that mentioned the need in a response.

Qualifying Population 1 (QP 1):

HOME-ARP's Qualifying Population 1 is households who are homeless, as defined in section 103(a) of the McKinney-Vento Homeless Assistance Act, as amended (42 U.S.C. 11302(a)) ("McKinney-Vento"). 45 of 59 entities reporting serving QP 1.

QP 1 Theme: Desperate need for affordable housing

Both service providers and PHAs report a desperate need for **affordable housing (15)** in their areas, especially housing with **income-based and/or subsidized rents (4)**. They report **increases in rent (3)** are driving up the number of people experiencing homelessness in their areas.

QP 1 Theme: Need for support services

Service providers mention a need for landlords who will accept homeless applicants, especially those experiencing **mental health issues (3)**, **chronic health issues (2)**, **struggles with substance use (3)**, or **re-entry from incarceration (3)**. Service providers express need for more services geared toward assisting people with these person-specific struggles.

Finally, both service providers and PHAs report additional needs for **transportation (3)**, **employment opportunities (2)**, and **childcare (1)** to help their clients maintain housing.

QP 1 Theme: PIT count concerns

Service providers rely on their CoCs **PIT count data (9)** to quantify homelessness and make decisions about services. Several mentioned concerns about **increases in unsheltered homelessness (5)** in their areas, the PIT count being an **underrepresentation of level of need (3)**, and **area services being overcapacity and/or with waitlists (3)**.

QP 1 Theme: Need for non-congregate shelter

An **increase in non-congregate shelter (5)** is important to several service providers. Service providers in more rural areas are concerned there are **no local emergency shelter or transitional housing options (3)** available.

Qualifying Population 2 (QP 2):

HOME-ARP's Qualifying Population 2 is those who are at risk of homelessness, as defined in section 401 of McKinney-Vento. 43 out of 59 entities reported serving QP 2.

QP 2 Theme: Inadequate supply of affordable housing

Both service providers and PHAs identify **housing affordability (19)** as the main driver for homelessness risk. The main component is an **inadequate supply of affordable housing (9)**. PHAs mention **long wait lists (5)** for affordable units, especially **one-bedroom units (3)**. In the long-term, increases in the supply of affordable housing are needed to decrease homelessness.

QP 2 Theme: Concerning increases in rent and inflation

Both service providers and PHAs identify **housing affordability (19)** as the main driver for homelessness risk.

In addition to inadequate affordable housing supply, the other component mentioned is **increases in rent (6)** are making housing unaffordable. In addition, **inflation (7)** in food, gas, or child care are making previously affordable rent more difficult to pay. In the short term, **TBRA (6)** is needed to keep renters in their homes along with **support services (8)** to address any underlying reasons for instability (employment changes, emergency funds, utility bills).

Qualifying Population 3 (QP 3):

HOME-ARP's Qualifying Population 3 is those who are fleeing, or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking. 31 out of 59 entities reported serving QP 3.

QP 3 Theme: Need for affordable housing for those fleeing

Service providers identify a need for **affordable housing (6)** as the main priority, as safe, long-term housing enabled those fleeing to live independently. **Rental assistance (3)** and **deposit assistance (1)** are also needs.

QP 3 Theme: Need for local emergency shelters

Some rural service providers mention a need for **local emergency shelters (3)**. Funded **hotel vouchers (1)** may be an alternative to emergency shelter, if coupled with support services.

QP 3 Theme: Need for support services

Aside from affordable housing or rental assistance, other **support services (11)** are needed to help those fleeing transition to living independently, including education/employment opportunities (3), budgeting assistance (2), childcare options (2), and counseling (1).

2026 Substantial Amendment:

QP 3 Theme from Consultation with Housing Partners: **Need for special considerations**

Statewide, special considerations must be given to the unique and often complex physical and emotional safety needs of the QP3 population to enhance safety/privacy and provide adequate protections from abusers. HUD has established special protections in its delivery of resources to the homeless fleeing domestic/sexual violence to ensure the confidentiality of data and to allow for the targeted delivery of resources to the population. Likewise, the State of Tennessee has furthered federal efforts to support this population through its Safe at Home Address Confidentiality Program to prevent an abuser tracking or discovering the residential address of a victim through public records. These practices enable victims of domestic violence and other crimes to obtain a sense of security in their own homes and freedom from intimidation or further abuse. Based on these practices and consultation with local organizations, QP3 may benefit from participation in housing programs that offer trauma-informed and culturally relevant services provided in a confidential or targeted settings only for this QP. As a result, the State of Tennessee intends to allow organizations to “prefer” (or apply for HOME-ARP funding with the intent to use it preferentially for) QP3. Within QP3, all Fair Housing, civil rights, and nondiscrimination laws will still be followed.

Qualifying Population 4 (QP 4):

HOME-ARP’s Qualifying Population 4 is those who are part of other populations where providing support services or assistance would prevent a family’s homelessness or would serve those with greatest risk of housing instability. 47 out of 59 entities reported serving QP 4.

QP 4 Theme: Need for affordable housing

Entities emphasize many people are vulnerable because of poverty, and once again emphasize a need for **affordable housing (9)**.

QP 4 Theme: Variety of vulnerable populations

Service providers and PHAs mention several categories for vulnerable populations, including the **elderly (8)**, especially those on **fixed incomes (3)**, those **using substances (5)**, those with **mental health concerns (4)**, those with **disabilities (4)**, those with **criminal histories (3)**, **youth (3)**, **parenting youth (1)**, and **veterans (1)**.

Qualifying Population 5 (QP 5):

HOME-ARP’s Qualifying Population 5 is those who are veterans and families that include a veteran family member that meet the criteria in (1)-(4) above. 34 out of 59 entities reported serving QP 5.

QP 5 Theme: Need for affordable housing

Entities emphasize a need for **affordable housing (9)** for veterans.

QP 5 Theme: Veterans have more support than other populations

Several service providers mention **veterans have better supports (4)** than other vulnerable populations. Specifically, the **VA hospitals (4)** provide many support services to veterans. In addition, housing specific support, like **VASH vouchers (4)**, are available. However,

there is a need to increase the **number of landlords (2)** who accept VASH vouchers. PHAs emphasized **veterans do not receive priority (4)** for housing.

To request an appendix showing the specific survey responses related to themes, please contact research@thda.org.

THDA held a virtual public hearing on Tuesday, July 12, 2022 from 11 AM – 1 PM CDT via WebEx. 73 organizations were invited to attend the virtual public hearing, and approximately 50 organizations did. At this hearing, THDA presented the findings of the HOME-ARP Needs Assessment survey and its proposed Allocation Plan. Participants were invited to give feedback both verbally during the meeting and/or via email afterward about unmet needs and proposed allocations.

Two participants shared feedback verbally about unmet needs for HOME-ARP qualifying populations during the public hearing.

The first person was a developer of affordable housing, who suggested using HOME-ARP funds to mitigate cost inflation for developers who already had projects in progress throughout the state, noting this would assist with the overarching goal of providing affordable housing for any of the HOME-ARP qualifying populations (QP 1 – 5). He suggested some specific dollar amounts for grants to cover gaps in funding that would be useful to developers. He also suggested using HOME-ARP money to incentivize developers to build multifamily structures with units for a mix of income levels to allow low-income and/or previously homeless residents to escape poverty but not have to move properties if their incomes eventually exceeded the thresholds to qualify for subsidized housing. Finally, he suggested giving preference to developers who included plans for addition recovery services within their developments, since HOME-ARP is especially focused on alleviating and preventing homelessness (QP1), and many homeless people could use addition recovery supports. This person also summarized the feedback he shared in the meeting in a comment via email.

The second person was from an organization providing supportive services to people who are re- entering society after incarceration. She noted having housing and supportive services for this population would prevent this group with special housing considerations from becoming homeless (QP4). She specifically noted difficulty in locating housing for people convicted of arson or sex offender crimes. She also noted people re-entering society often have significant physical and mental health concerns, and suggested the affordable housing resources geared toward this group could include additional supportive services, like transportation to healthcare facilities, mental health screening and treatment, group therapy, and support in obtaining useful resources, like government IDs and resumes, giving this group a better chance of remaining housed. This person also summarized the feedback shared in the meeting in a comment via email.

In addition to the verbal/emailed feedback detailed above, four other organizations also

submitted emailed feedback from the public hearing regarding unmet needs and the proposed allocation plan. Their feedback was oriented around barriers to affordable housing, as well as needs for supportive services. One person representing a PHA noted many people have vouchers for subsidized rent but encounter a shortage of landlords willing to accept the vouchers, which puts these people at greater risk of experiencing homelessness (QP2). This person also noted her area had a need for low-barrier, non-congregate shelter to serve homeless individuals (QP1), explaining health concerns and conflicts over gender and religious beliefs were preventing some people from utilizing shelter resources. She also noted a low-barrier affordable housing development was recently condemned, and 65 households were displaced within 12 hours, causing a huge increase in people experiencing homelessness in her area (QP1). Another person representing a supportive service provider reiterated concerns about increasing costs for developers, and suggested using HOME-ARP funds to close gaps in funding. This person also suggested allowing HOME-ARP to be “layered” with other funding sources to allow for more ambitious housing and supportive service projects to be accomplished. Another person representing a supportive service organization for victims of domestic violence noted a severe lack of funding (\$30,000 total yearly) to meet the housing and supportive service needs of those fleeing (2000+ persons per year) and said allocations of HOME-ARP funds for this purpose are needed across Tennessee.

THDA responded to all of the comments received via email after the public hearing. For a record of comments received and THDA’s responses, please see Appendix B.

Identify and consider the current resources available to assist qualifying populations, including congregate and non-congregate shelter units, supportive services, TBRA, and affordable and permanent supportive rental housing:

THDA’s Response:

Please see the sections above detailing Tennessee’s shelter inventory in 2021, including emergency shelter and transitional housing.

Although supportive services for each of qualifying populations exist in the State of Tennessee, these services may not be available to the same extent in all regions of the state. Some regions, especially more rural areas, note a lack of emergency shelter and transitional housing in their areas.

THDA currently oversees a HOME funded TBRA program focused on youth aging out of foster care. In addition, several programs with grantees across the state provide some form of rental assistance or financial stabilization for housing, including Housing Opportunities for Persons with HIV/AIDS (HOPWA), Emergency Solutions Grants (ESG), the Housing Choice Voucher (HCV) and the Emergency Housing Voucher (EHV) programs. Affordable housing is a need across the entire state. The need is especially acute in the Memphis and Nashville metro areas, where nearly half of Tennessee’s households of

Extremely Low Incomes (ELIs) reside. Please see the section above detailing the National Low Income Housing Coalition's analysis of affordable housing supply in Tennessee. THDA is currently working on updating its database of affordable housing to better quantify and categorize available affordable housing resources.

Identify any gaps within the current shelter and housing inventory as well as the service delivery system:

THDA's Response:

As previously mentioned, emergency shelter and transitional housing inventory in 2020 was inadequate to meet the needs of people known to be experiencing homelessness. Several CoCs had inadequate shelter resources for families. All CoCs had inadequate resources for adult individuals. Despite some increases in overall shelter beds in 2021, service providers report current unmet needs for people experiencing homelessness on THDA's 2022 HOME-ARP Needs Assessment Survey.

Tennessee has a severe shortage of affordable housing for ELI households, meaning those with an income of less than 30% of Area Median Income. In keeping with this shortage, the need for affordable housing was a recurring theme for all HOME-ARP qualifying populations on THDA's 2022 Needs Assessment Survey. Because of a lack of supply of affordable housing, service providers in Tennessee report struggling to find housing for people experiencing homelessness or people fleeing domestic violence. In addition, more affordable housing is needed to serve specific sub-populations, like one-bedroom apartments that are accessible to tenants who are elderly and/or have a disability. Finally, housing that was once affordable is becoming unaffordable due to increases in rent and overall inflation of living expenses. As a result, people are increasingly at-risk of becoming homeless. Service providers and PHAs report increased TBRA would help in the short-term, but unless more affordable housing becomes available, homelessness is likely to increase.

Please see the sections above for a more detailed analysis of the gaps in shelter, housing inventory, and the service delivery system.

Identify the characteristics of housing associated with instability and an increased risk of homelessness if the PJ will include such conditions in its definition of "other populations" as established in the HOME-ARP Notice:

THDA's Response:

Not Applicable

Identify priority needs for qualifying populations:

THDA's Response:

THDA's 2022 HOME-ARP Needs Assessment Survey consulted required entities about HOME- ARP's eligible activities and asked them to rank these activities in terms of importance to meeting the needs of the HOME-ARP qualifying populations. Rank 1 is the highest importance and 4 is the lowest. Entities were also able to select an activity as being not applicable (N/A). A few survey respondents left this question blank.

HOME-ARP allowable activities include:

1. Development and support of affordable housing
2. Tenant-based rental assistance (TBRA)
3. Provision of supportive services
4. Acquisition and development of non-congregate shelter units.

Survey results are shown in the charts on next page.

Overall survey results from all respondents:

	Rank 1	Rank 2	Rank 3	Rank 4	N/A	Blank
Activity 1	41/59 70%	10/59 15%	3/59 5%	1/59 2%	2/59 3%	2/59 3%
Activity 2	7/59 12%	17/59 29%	19/59 32%	12/59 20%	2/59 3%	2/59 3%
Activity 3	2/59 3%	17/59 29%	20/59 34%	16/59 27%	2/59 3%	2/59 3%
Activity 4	6/59 10%	11/59 19%	13/59 22%	18/59 31%	9/59 15%	2/59 2%

Survey results for service providers only:

	Rank 1	Rank 2	Rank 3	Rank 4	N/A	Blank
Activity 1	17/32 53%	9/32 28%	3/32 9%	0/32 0%	1/32 3%	2/32 6%
Activity 2	7/32 22%	5/32 16%	9/32 28%	8/32 25%	1/32 3%	2/32 6%
Activity 3	1/32 3%	11/32 34%	9/32 28%	8/32 25%	1/32 3%	2/32 3%
Activity 4	5/32 16%	4/32 13%	8/32 25%	8/32 25%	5/32 16%	2/32 6%

Survey results for PHAs only:

	Rank 1	Rank 2	Rank 3	Rank 4	N/A
Activity 1	24/27 89%	1/27 4%	0/27 0%	1/27 4%	1/27 4%
Activity 2	0/27 0%	12/27 44%	10/27 37%	4/27 15%	1/27 4%
Activity 3	1/27 4%	6/27 22%	11/27 41%	8/27 30%	1/27 4%
Activity 4	1/27 4%	7/27 26%	5/27 19%	10/27 37%	4/27 15%

Finally, as detailed in the summary above of comments received from THDA's public hearing, several organizations voiced a desire to use HOME-ARP funds to close funding gaps for developers of affordable housing with projects underway and to provide increased supportive services for people recovering from substance use disorders (QP4), for people re-entering society after incarceration (QP4), and for people fleeing violence (QP3).

The survey data above, as well as additional feedback from the public hearing, has enabled THDA to allocate HOME-ARP funds to meet the needs of the qualifying populations and entities serving them. Please see the sections below regarding THDA's proposed allocations of HOME- ARP funds.

Explain how the level of need and gaps in its shelter and housing inventory and service delivery systems based on the data presented in the plan were determined:

THDA's Response:

As previously mentioned, THDA administered the 2022 HOME-ARP Needs Assessment Survey to required entities across the state. 131 entities were invited to participate. 59 responses were complete or partially complete and, therefore, included in the survey analysis. The entities self-reported which HOME-ARP qualifying populations they served and provided data about these populations and descriptions of current resources available and unmet needs. For each qualifying population, THDA synthesized these responses into themes to describe the unmet needs. The survey also notified the entities of HOME-ARP's eligible activities and asked them to rank these activities in terms of importance to meeting the needs of the qualifying populations they served.

In addition, THDA presented the findings of the HOME-ARP Needs Assessment survey in the public hearing for the proposed HOME-ARP Allocation Plan. During this meeting, two attendees gave additional feedback regarding housing needs and supportive services during the meeting, and six comments were received afterward via email.

All of this feedback allowed THDA to allocate funds according to the expressed needs of these entities.

HOME-ARP Activities

Describe the method for soliciting applications for funding and/or selecting developers, service providers, sub-recipients and/or contractors and whether the PJ will administer eligible activities directly:

THDA's Response:

THDA will not directly administer the eligible activities.

THDA will solicit applications for Rental Housing and Support Services funding in the manner in which it currently circulates its NOFAs via the following methods of communication:

- Mass emails to its network of grantees across the state
- Mass emails through our Communications, Community Housing and Community Services Divisions
- Posting the NOFA on our website
- Social Media
- In-person networking through our Community Housing, Community Services, and Communications Divisions

THDA plans to hold at least four (4) rounds of HOME-ARP grant applications.

- Original Plan: The First Round made an immediate round of funding available for the development of affordable rental housing in late 2022, recognizing that existing projects targeting eligible populations were proposed with existing funding gaps. THDA awarded slightly over \$10M to five nonprofit housing developers during this round.
- Original Plan: The Second Round made a portion of the Supportive Service funding available to providers of services to people experiencing homelessness and to those at-risk of homelessness for rapid rehousing, homelessness prevention, and other eligible support services. THDA awarded nearly \$6M to 17 organizations for support service funding under this round. THDA also awarded \$650,000 in administrative funds to assist selected grantees with program administration costs.
- 2026 Substantial Amendment: A Third Round will be made available in 2026 for the development of rental housing and the provision of project operating cost assistance. Subsequent funding rounds may be made available based on demand, funding availability, and available time to complete development ahead of program closeout in June 2030.
- 2026 Substantial Amendment: A Fourth Round will make a second allocation of Supportive Service Only funding available to providers of services to eligible QP populations for rapid rehousing, homelessness prevention, and other eligible support services. Up to 15% of the total support service award will be made available to assist with administrative costs of grant implementation. A subsequent funding round may be made available based on demand, funding availability and sufficient time to complete

implementation ahead of program closeout in June 2030.

If any portion of the PJ's HOME-ARP administrative funds were provided to a sub-recipient or contractor prior to HUD's acceptance of the HOME-ARP allocation plan because the sub-recipient or contractor is responsible for the administration of the PJ's entire HOME-ARP grant, identify the sub-recipient or contractor and describe its role and responsibilities in administering all of the PJ's HOME-ARP program:

THDA's Response:

THDA has not, and will, not release any administrative funds to a sub-recipient or contractor prior to HUD's acceptance of the HOME-ARP Allocation Plan.

PJs must indicate the amount of HOME-ARP funding that is planned for each eligible HOME- ARP activity type and demonstrate that any planned funding for nonprofit organization operating assistance, nonprofit capacity building, and administrative costs is within HOME-ARP limits. The following table may be used to meet this requirement.

Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	Original: \$5,659,525.00 2023 SA: \$5,659,525.00 2025 NSA: \$5,523,238.00 2026 SA: \$17,973,750.45		
Acquisition and Development of Non-Congregate Shelters	Original: \$4,370,994.00 2023 SA: \$0.00 2025 NSA: \$0.00 2026 SA: \$0.00		
Tenant Based Rental Assistance (TBRA)	Original: \$0.00 2023 SA: \$0.00 2025 NSA: \$0.00 2026 SA: \$0.00		
Development of Affordable Rental Housing	Original: \$33,000,000.00 2023 SA: \$33,000,000.00 2025 NSA: \$32,205,325.00 2026 SA: \$28,911,933.65		
Non-Profit Operating	Original: \$1,132,119.00 2023 SA: \$5,503,113.00 2025 NSA: \$5,370,592.00 2026 SA: \$0.00	0%	5%
Non-Profit Capacity Building	Original: \$1,132,119.00 2023 SA: \$1,132,119.00 2025 NSA: \$1,104,856.00 2026 SA: \$0.00	0%	5%
Administration and Planning	Original: \$7,991,427.00	9.6%	15%

	2023 SA: \$7,991,427.00 2025 NSA: \$7,798,985.00 2026 SA: \$5,117,311.90		
Total HOME ARP Allocation	Original: \$53,286,184.00 2023 SA: \$53,286,184.00 2025 NSA: \$52,002,996.00 2026 SA: \$52,002,996.00		

Additional narrative, if applicable:

“SA” means substantial amendment. “NSA” means non-substantial amendment.

THDA’s Response (Original Plan):

The final distribution of the HOME-ARP allocation will be determined based on the demand for an eligible activity. THDA, at its sole discretion, may move funding between the HOME-ARP eligible activities, including Administration, to fund all qualified grant applications received under an activity and/or, if insufficient applications are received, to commit all HOME-ARP funds within the Support Service and Rental Housing Development categories.

THDA’s Response (2023 Substantial Amendment):

In the original HOME-ARP Allocation Plan, THDA allocated \$4,370,994 toward Acquisition and Development of Non-Congregate Shelters. However, during the HOME-ARP needs assessment, only 10% of respondents ranked this activity as the top priority. Based on this assessment, THDA is reallocating the funds from Acquisition and Development of Non-Congregate Shelters to Non-Profit Operating expenses.

THDA’s Response (2025 Non- Substantial Amendment):

In February of 2025, the U.S. Department of Housing and Urban Development (HUD) adjusted THDA’s total amount of HOME-ARP funding from \$53,276,184 to \$52,002,996. As a result, THDA reduced its HOME-ARP allocations in the funding table above in proportion to their “Percent of the Grant” percentages in the 2023 Substantial Amendment table.

THDA’s Response (2026 Substantial Amendment):

THDA has seen an increased need for Supportive Services activities across its Continua of Care (CoCs). As a result, \$5,370,592 from Non-Profit Operating activities, \$1,104,856 from Non-Profit Capacity Building activities, \$3,293,391.35 from Rental Development activities, and \$2,681,673.10 from Administration and Planning activities—totaling \$12,450,512.45—will be reallocated to Supportive Services activities.

Describe how the characteristics of the shelter and housing inventory, service delivery system,

and the needs identified in the gap analysis provided a rationale for the plan to fund eligible activities:

THDA's Response (2026 Substantial Amendment):

The outlook and development of THDA's allocation plan is based on historical figures, while also being sensitive to likely housing trajectories. The Need for Affordable Rental Housing was cited in the Needs Analysis as a primary need for all QP populations. Therefore, the Development of Affordable Rental Housing coupled with project operating cost assistance to financially support these rental housing developments is seen to be vital and imperative in combating homelessness. THDA plans to allocate nearly 55.6% of its HOME-ARP resources to meet this demand.

The need for supportive services to be implemented by organizations currently serving the QP populations also was cited as a high need in Tennessee. The State has an established funding mechanism and delivery system within its Emergency Solutions Grants program to support eligible populations with eligible services; however, that resource is critically underfunded. Therefore, THDA has opted to expand its commitment to meeting this service need by allocating approximately 34.6% of its HOME-ARP resources to organizations serving eligible QP populations given the established framework to deliver these services.

Approximately 9.8% of the HOME-ARP allocation will be made available to cover the costs of THDA's administration of the program and that of HOME-ARP Supportive Services grantees.

THDA opted not to fund the development of Non-Congregate Shelters due to concerns of insufficient long-term operating support to fund the operation of shelters over the course of the program's required compliance period. Additionally, the State seeks to encourage the movement of individuals directly into rental housing options with wrap-around support services, the most pressing need identified for the state.

HOME-ARP Production Housing Goals

Estimate the number of affordable rental housing units for qualifying populations that the PJ will produce or support with its HOME-ARP allocation:

THDA's Response:

275 total affordable rental housing units are anticipated to be produced. Of the 275 units, we estimate 70% (193) will be one (1) BR with 25% (69) being two (2) BR and the remainder (13)

being three (3) or more bedroom units.

Describe the specific affordable rental housing production goal that the PJ hopes to achieve and describe how it will address the PJ's priority needs:

THDA's Response:

THDA has set a goal of 275 affordable rental units based on the rental housing production set-aside and 2022 subsidy limits for two (2) bedroom units. Of the 275 units, we estimate 70% (193) will be one (1) BR with 25% (69) being two (2) BR and the remainder (13) being three (3) or more bedroom units. This goal seeks to address the monumental need for affordable housing in Tennessee. The need for available beds and housing is reflected in the Homeless Needs Inventory Gap noted in our research.

Preferences

Identify whether the PJ intends to give preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project:

- ***Preferences cannot violate any applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a).***
- ***PJs are not required to describe specific projects to which the preferences will apply.***

THDA's Response (2026 Substantial Amendment):

Generally, THDA will not apply preferences among the qualifying populations for eligible housing units or the delivery of support services, unless such housing units or services are specifically set-aside for QP3 populations, those who are fleeing, or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking.

Statewide across all Continua of Care, THDA will allow for preferences in both housing and supportive services to QP3 households to meet the Need for Special Considerations identified in the State's Gap Analysis, which protect this especially vulnerable population. Organizations applying a preference for QP3 will use the Referral Method of a Project/Activity Waiting List.

If a preference was identified, explain how the use of a preference or method of prioritization will address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or category of qualifying population, consistent with the PJ's needs assessment and gap analysis:

THDA's Response (2026 Substantial Amendment):

THDA will fund rental housing projects and supportive services activities at organizations that serve all QPs; however, in the event that a provider of housing and/or supportive services to QP3 applies and is eligible to be awarded funding under THDA's competitive scoring methodology, THDA will allow QP3 housing/service providers to "prefer" (or use funding preferentially for) QP3 households as part of standard protections for QP3 to enhance that population's sense of security in their own homes and freedom from intimidation or further abuse.

If a preference was identified, describe how the PJ will use HOME-ARP funds to address the unmet needs or gaps in benefits and services of the other qualifying populations that are not included in the preference:

THDA's Response (2026 Substantial Amendment):

THDA will still fund rental housing projects and organizations that deliver supportive services benefiting all QPs. As a result, the majority of HOME-ARP funding will be made available to all QPs.

HOME-ARP Refinancing Guidelines

If the PJ intends to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds, the PJ must state its HOME- ARP refinancing guidelines in accordance with [24 CFR 92.206\(b\)](#). The guidelines must describe the conditions under which the PJ will refinance existing debt for a HOME-ARP rental project, including:

- ***Establish a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing to demonstrate that rehabilitation of HOME-ARP rental housing is the primary eligible activity***
- ***Require a review of management practices to demonstrate that disinvestment in the property has not occurred; that the long-term needs of the project can be met; and that the feasibility of serving qualified populations for the minimum compliance period can be demonstrated.***
- ***State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.***
- ***Specify the required compliance period, whether it is the minimum 15 years or longer.***
- ***State that HOME-ARP funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.***
- ***Other requirements in the PJ's guidelines, if applicable:***

THDA's Response:

THDA will not permit the refinancing of existing debt with HOME-ARP funds.



Appendix A
Organizations Consulted via HOME-ARP Needs Assessment Survey

Name	Type of Organization	Qualifying Populations Served
Bolivar Housing Authority	PHA	1, 2, 4, 5
Dyersburg Housing Authority	PHA	1, 2, 3, 4, 5
Elizabethton Housing and Development Agency	PHA	1, 2, 3, 4, 5
Erwin Housing Authority	PHA	1, 2, 3, 4, 5
Etowah Housing Authority	PHA	1, 2, 3, 4, 5
Fayetteville Housing Authority	PHA	1, 2, 3, 4, 5
Highlands Residential Services	PHA	1, 2, 3, 4, 5
Jackson Housing Authority	PHA	1, 2, 3, 4, 5
Kingsport Housing and Redevelopment Authority	PHA	1, 2, 3, 4, 5
Lafayette Housing Authority	PHA	1, 2, 5
LaFollette Housing Authority	PHA	1, 2, 3, 4, 5
Lenoir City Housing Authority	PHA	2
Livingston Housing Authority	PHA	1, 2, 3, 4, 5
Manchester Housing Authority	PHA	1, 2, 4
Maryville Housing Authority	PHA	1, 2, 4
McMinnville Housing Authority	PHA	2, 3, 4, 5
Memphis Housing Authority	PHA	4
Metropolitan Development and Housing Agency (MDHA)	PHA	1, 2, 3, 4, 5
Morristown Housing Authority	PHA	1, 2, 3, 4, 5
Murfreesboro Housing Authority	PHA	1, 2, 3, 4, 5
Newbern Housing Authority	PHA	1, 2, 3, 4, 5
Newport Housing Authority	PHA	1, 2, 4
Ripley Housing	PHA	1, 2, 3, 4, 5
Savannah Housing Authority	PHA	1
Shelbyville Housing Authority	PHA	1, 2, 3, 4, 5
South Pittsburg Housing Authority	PHA	4
Sparta Housing Authority	PHA	2
Area Relief Ministries	Homelessness Service Provider	1, 2, 4
Bethesda Community Mission, Inc.	Homelessness Service Provider	1

Chattanooga Room in the Inn	Homelessness Service Provider	1, 4
Family Promise of Bristol	Homelessness Service Provider	1, 2
Family Promise of Greater Johnson City	Homelessness Service Provider	1
Family Promise of Greater Kingsport	Homelessness Service Provider	1, 2, 3, 4, 5
Merited Favor Safe House	Homelessness Service Provider	1, 2, 4
Middle Tennessee Rural Reentry	Homelessness Service Provider	1, 2, 4
Murfreesboro Cold Patrol	Homelessness Service Provider	1, 3, 4, 5
Oasis Center	Homelessness Service Provider	1, 2, 3, 4, 5
Recovery Community, Inc.	Homelessness Service Provider	1, 4, 5
Tennessee Homeless Solutions	Homelessness Service Provider	1, 2, 4, 5
Tennessee Valley Coalition for the Homeless	Homelessness Service Provider	1, 2, 3, 4, 5
The Journey Home, Inc.	Homelessness Service Provider	1, 2, 3, 4, 5
Upper East Tennessee Human Development Agency, Inc.	Homelessness Service Provider	1, 2, 3, 4, 5
Volunteer Ministry Center	Homelessness Service Provider	1, 2, 4
Women With Open Arms	Homelessness Service Provider	1, 2, 3, 4
Bridges DVC	Domestic Violence Service Provider	3
Domestic Violence Program, Inc.	Domestic Violence Service Provider	3
Families in Crisis, Inc.	Domestic Violence Service Provider	1, 2, 3
SafeSpace	Domestic Violence Service Provider	3
WRAP	Domestic Violence Service Provider	3
I Am Recovery	Service Provider for Other Vulnerable Populations	4
Jesus Cares McNairy	Service Provider for Other Vulnerable Populations	1, 2, 4, 5
The South Central Family Center	Service Provider for Other Vulnerable Populations	1, 2, 4, 5
WAR Group, LLC	Service Provider for Other Vulnerable Populations	1, 2, 4
TVHS	Veterans Service Provider	5

Jackson/West Tennessee CoC	CoC	1, 2, 3, 4, 5
Appalachian Regional Coalition on Homelessness (ARCH) CoC	CoC	1, 3, 4
Fahe	Private organization - public advocacy and regional networking	1, 2, 3, 4, 5
Knoxville Knox County CAC	Community Action Committee	2, 4, 5
Lincoln County Recovery Court	Public Agency	4



Appendix B

Responses to Written Comments Received

Date: 7/21/2022

Agency/Organization: Holladay Ventures

Agency/Organization Consulted: Community base, affordable developer organization

Method of Consultation: Remote Meeting

Feedback:

- The ability to use funds for projects that are ready closed would allow developers to mitigate the cost increase in construction materials and labors. In case, it would make sense to work with developers who have already received the HUD environmental approval.
- When considering awards, the awards should be consistent with market rate construction cost per unit to adequately cover the cost of units. For example, if it costs \$200,000/unit in construction cost, an award of \$2,000,000 would be sufficient for the funding of 10 units.
- As this project is geared towards fighting homelessness, we believe that addiction recovery services and housing should be included as an eligible use of funds.
- Incentivizing developers to include a mix of income levels would allow residents to have the ability to continue to grow their lives and incomes while remaining in the same building. This prevents residents from “graduating” out of their income level and having to move to another building.

THDA Responses

Thank you so much for your valued response and input. While THDA would like to have the option to extend funding to fill construction and/or budgetary gaps, the HUD Subsidy Limits places restrictions on our ability to fully back-fill these projects. Homelessness, within Qualifying Populations, is at the epicenter of HOME- ARP initiative. THDA has captured and strongly considers your feedback as we move forward with building our HOME-ARP Allocation Plan. Thanks for your time and attention.

Date: 7/28/2022
Agency/Organization: Crossville Housing Development Corporation
Type of Agency/Organization
Consulted: PHA
Method of Consultation: Remote Meeting
Feedback:

- Production/Preservation of Affordable Housing
- Tenant-Based Rental Assistance
- Supportive Services, homeless prevention and housing counseling
- Purchase/development of non-congregate shelter that can be converted
- There are hundreds of vouchers out there, but no place to rent. Ideally, people would go to a homeless shelter while we enroll them in voucher program, so they wouldn't have to be on street.
- 2/3 homeless shelters have such high barriers, that a large percent of people are turned away, things like prescription meds for diabetes, slightly crippled, gender issues, religious beliefs. We believe are in desperate need of non-congregate LOW BARRIER shelters.
- One of our low-barriers housing (Village Inn) in Cumberland County was condemned and 65 households were displaced within 12 hours. The mission has opened its doors for a limited amount of time. Churches have put some families in motels for few nights. BOTTOM LINE WE HAVE NO WHERE TO PUT THEM. No apartment available!

THDA Response:

Homelessness, within Qualifying Populations, is the primary factor for the HOME-ARP initiative. THDA has captured and strongly considers your motion for supportive services and non-congregate housing as we move forward with building our HOME-ARP Allocation Plan. Thanks for your time and attention.

Date: 7/26/2022
Agency/Organization: I Am Recovery
Type of Agency/Organization Consulted: Community based, transitional housing supportive services
Method of Consultation: Remote Meetings
Feedback:

- It is my desire to provide Continuum of Care support services, providing greater coordination in responding to their needs. Assisting by providing the housing and services (prioritize individuals and families eligible to receive the assistance, and the amount and type of assistance they should receive.) Some of the areas are Rapid Re-housing; Transitional Housing; Supportive Services Only
- From here I would like to converse on the criteria that's needed to move forward with the implementation of execution per the funding agreement. My area of choice I believe falls under the below insert:
- Supportive Services, including services defined at 24 CFR 578.53(e), Homeless Prevention Services, and Housing Counseling

THDA Response:

Homelessness, within Qualifying Populations, is the primary factor for the HOME-ARP initiative. THDA has captured and strongly considers your motion for supportive services and non-congregate housing as we move forward with building our HOME-ARP Allocation Plan. Thanks for your time and attention.

Date: 7/27/2022
Agency/Organization: Aim Center
Type of Agency/Organization
Consulted: Supportive Services Provider
Method of Consultation: Remote Meeting
Feedback:

- Allow applicants to use both local/municipal ARP funds and THDA ARP funds in larger projects. Housing developers planning to apply for LIHTC also require multiple layers of grant funding in order to make the project feasible. During COVID-19 development timelines have been disrupted due to the reduction in available grant funding award amount and funding rounds being cancelled until next year. This has left projects in jeopardy of returning already awarded grants without gap funding. The available ARP funds from the municipalities are not enough for the gap in larger projects that are near shovel ready.
- Allow higher limits on the amount of funding projects can request Projects using grant funding must have leverage from multiple funding sources in order to create more affordable housing. With the reduction in award amounts from other fund sources and other grants not available for another year, allowing higher limits on the amount of funding project can request will fill this widening gap.

THDA Response:

Thank you so much for your valued response and input. Homelessness, within Qualifying Populations, is the primary factor for the HOME-ARP initiative. This standard gives pause to the ability to attract LIHTC projects, as practice has shown LIHTC projects ideal for income qualifying requirements. While THDA would like to have the option to extend funding to fill construction and/or budgetary gaps, the HUD Subsidy Limits places restrictions on our ability to fully back-fill these projects. THDA has captured and strongly considers your feedback as we move forward with building our HOME-ARP Allocation Plan. Thanks for your time and attention.

Date: 7/30/2022

Agency/Organization: Wo/Men's Resource & Rape Assistance Program (WRAP)

Type of Agency/Organization

Consulted: Community based, Supportive Service Provider

Method of Consultation: Remote Meeting

Feedback:

- ☐ WRAP serves 19 counties in West Tennessee—essentially, every county west of the Tennessee River except for Fayette and Shelby. In 2021-22, WRAP assisted 831 women, men, and children with emergency housing for a total of 3,115 bed nights. We also helped 143 families with relocation services and 104 families with new homes through ESG and ESG Cares.
- Currently, WRAP has less than \$30,000 in HUD funding available to provide housing services and support for the more than 2,000 survivors of domestic violence we serve on average each year. This is simply untenable for survivors and their children who often lack a safe place to go and struggle to meet basic needs when they leave an abusive relationship. Thus, there is a great need for HOME-ARP funding in West Tennessee to assist adult and child survivors of domestic abuse who are homeless or at risk of homelessness by providing emergency housing, rental assistance, and supportive services to reduce homelessness and increase housing stability.
- With this funding, salaries & benefits can be provided for professionals to operate & oversee WRAP's two confidential safe homes, which offer private, fully-equipped, hotel-like rooms for survivors who are transitioning from an abusive home to a safer living arrangement. HOME-ARP funding will support the provision of case management services for survivors as well as provide for day- to-day operations, food, and supplies.
- HOME-ARP funding will also assist survivors in their transition to more living arrangements through the provision of tenant-based rental assistance and assistance with moving costs, utility deposits, and security deposits.

- With supportive services, survivors can be assisted with meeting education needs such as completing a GED, life skills training, mental/outpatient healthcare for assistance with overcoming the trauma of abuse, child care vouchers, transportation services, and car repairs.
- Survivors of domestic abuse in West Tennessee who are homeless or at risk of homelessness would benefit tremendously by HOME-ARP funds, and we hope to have the opportunity to apply for some of this funding on behalf of those we serve.

THDA Responses

Homelessness, within Qualifying Populations, is the primary factor for the HOME-ARP initiative. THDA has captured and strongly considers your motion for supportive services and non-congregate housing as we move forward with building our HOME-ARP Allocation Plan. Thanks for your time and attention.

Date: 7/13/2022

Agency/Organization: Dismas House

Type of Agency/Organization

Consulted: Supportive Housing provider for Ex-Offenders

Method of Consultation: Remote Meeting

Feedback:

- ☐ Dismas House does not serve arsonists and sex offenders because of additional requirements and these individuals have significant barriers employment and housing. There is limited housing availability in Nashville, I can only come up with Room at the Inn or Project Return. Have not researched HUD policy but this subset of the population may be excluded from most housing solutions.
Arsonist and sex offenders are a small percentage of your census population but they have been historically excluded from solutions.
- Newly release citizen arrive regularly with untreated physical health conditions, we have had 3 had hernias, one with severe lung condition needing surgery for a partial lung removal, three were unable to work needed disability-SSI, one had severe vision problems, to name a few. Regardless of age 85% of our new residents have pre-existing vision dental and physical health problem that need to be addressed. It limits the number of agencies that can take a person with health limitations even if they had insurance, they cannot work or pay rent.
- Evaluations perform within first 72 hours and are typically diagnosed with anxiety, mood or psychotic disorders. There is an adjustment period to being free especially for those who have served long sentences of 15 years or more. Also, have 80% of our residents have untreated SUD, with co-occurring disorders and we need to provide one-on-one and group therapy sessions separately for mental health and SUD, it is important that treatment be offered onsite whenever possible.
- Most resident do not have a valid driver's license or transportation upon arrival. For that reason HUD policy would need to recognize that a variety of support services are best provided onsite

and exclude the office and treatment space needed to provide these services. Case managers residing onsite can help with a wide range of support services including work force readiness, financial literacy training and family counseling.

THDA Responses

Thank you so much for your valued response and input. Homelessness, within Qualifying Populations, is the primary factor for the HOME-ARP initiative. THDA will be bound by HUD statutes as it relates to ineligible populations per 24 CFR 982.553 and 24 CFR 960.204. THDA has captured and strongly considers your motion for supportive services and non-congregate housing as we move forward with building our HOME- ARP Allocation Plan. Thanks for your time and attention.

NOTICE OF PUBLIC HEARINGS AND RELEASE OF THE 2022- STATE OF TENNESSEE HOME-AMERICAN RESCUE PLAN

Due to new protocols to mitigate the spread of COVID-19, THDA has decided to conduct a virtual Public Hearing on July 12, 2022. The public hearing will be available to all Tennesseans via webinar. Each will begin with a brief presentation and then open for public comments. The presentation, access information, draft materials will be posted to <https://thda.org>.

The Public Hearings will be offered via WebEx on the date and time below. Call in details will be posted to <https://thda.org>.

**Tuesday, July 12, 2022
11am-1pm Central Time Zone**

Join from the meeting link

<https://thda.webex.com/thda/j.php?MTID=m1d7b6d7c8adaa6287491718c6ac84ae4>

Join by meeting number

Meeting number (access code): 2465 057 0369

Meeting password: 8VJm6xJb6zv

Tap to join from a mobile device (attendees only)

[+1-650-479-3208](tel:+16504793208),,[24650570369##](tel:+16504793208) Call-in toll number (US/Canada)

[1-877-668-4493](tel:+18776684493),,[24650570369##](tel:+16504793208) US Toll Free

Join by phone

1-650-479-3208 Call-in toll number (US/Canada)

1-877-668-4493 US Toll Free

The public comment period is July 12, 2022 through July 31, 2022. The full notice, draft and summary, feedback link, public hearing presentation, updates, and other materials are or will soon be available at <https://thda.org>.

Please send any questions and translation requests to HOMEARP@thda.org.