



# Third Program Year CAPER

The CPMP Consolidated Annual Performance and Evaluation Report includes Narrative Responses to CAPER questions that CDBG, HOME, HOPWA, and ESG grantees must respond to each year in order to be compliant with the Consolidated Planning Regulations. The Executive Summary narratives are optional.

The grantee must submit an updated Financial Summary Report (PR26).

## GENERAL

### Executive Summary

This module is optional but encouraged. If you choose to complete it, provide a brief overview that includes major initiatives and highlights that were proposed and executed throughout the first year.

Program Year 3 CAPER Executive Summary response:

### Executive Summary

The following table lists the goals for the first three years of the Franklin Consolidated Plan for Housing and Community Development and the status of their accomplishments.

GOALS	ACCOMPLISHMENTS
1. Complete 10 Homeowner Rehab projects annually by end of Year 3	<ul style="list-style-type: none"> <li>• Policies and procedures created;</li> <li>• Program manager selected;</li> <li>• 8 projects completed or under contract</li> </ul>
2. Identify Community Based Development Organizations (CBDO) by end of Year 2	<ul style="list-style-type: none"> <li>• Four local non-profit organizations have been certified as CBDOS</li> </ul>
3. 2 CBDO pilot projects started by end of Year 3	<ul style="list-style-type: none"> <li>• Request for Proposals released and awards made for Years 2 and 3;</li> <li>• Agreements executed with two CBDOS</li> <li>• CBDOS acquired property without using CDBG</li> <li>• 1 single-family homebuyer project completed</li> </ul>
4. Homeless and Special Needs Assessment started by end of Year 1	<ul style="list-style-type: none"> <li>• Affordable Housing Committee appointed in Year 1</li> <li>• Data collection underway with analysis of information from 2008 and 2009 homeless counts</li> </ul>
5. Homeless and Special Needs Assessment published in Year 3	<ul style="list-style-type: none"> <li>• Data available with analysis of information from 2008 and 2009 homeless counts</li> </ul>
6. Homeless count	<ul style="list-style-type: none"> <li>• Pilot point-in-time count in mid-January</li> </ul>

---

<b>conducted in January of Year 2</b>	2008; <ul style="list-style-type: none"><li>• Monthly count conducted during January of Year 1</li><li>• Homeless count conducted in January 2009</li></ul>
<b>7. Assessment of Barriers to Affordable Housing completed by end of Year 1</b>	<ul style="list-style-type: none"><li>• List of barriers identified;</li><li>• Several solutions implemented;</li><li>• Ongoing analysis and recommendations underway</li></ul>
<b>8. Implement fair housing outreach program in Year 3</b>	<ul style="list-style-type: none"><li>• Request for Proposals released and awards made</li><li>• Agreement executed with local non-profit counseling agency</li><li>• Various media campaigns conducted, including Spanish language materials</li></ul>
<b>9. Counsel 15 households in fair housing/housing issues in Year 3</b>	<ul style="list-style-type: none"><li>• 23 attendants at 2 community workshops</li><li>• 6 households at homebuyer ed. classes with fair housing curriculum</li><li>• 6 households counseled</li></ul>

---

## General Questions

1. Assessment of the one-year goals and objectives:
  - a. Describe the accomplishments in attaining the goals and objectives for the reporting period.
  - b. Provide a breakdown of the CPD formula grant funds spent on grant activities for each goal and objective.
  - c. If applicable, explain why progress was not made towards meeting the goals and objectives.
2. Describe the manner in which the recipient would change its program as a result of its experiences.
3. Affirmatively Furthering Fair Housing:
  - a. Provide a summary of impediments to fair housing choice.
  - b. Identify actions taken to overcome effects of impediments identified.
4. Describe Other Actions in Strategic Plan or Action Plan taken to address obstacles to meeting underserved needs.
5. Leveraging Resources
  - a. Identify progress in obtaining "other" public and private resources to address needs.
  - b. How Federal resources from HUD leveraged other public and private resources.
  - c. How matching requirements were satisfied.

Program Year 3 CAPER General Questions response:

## Assessment of the one-year goals and objectives

**Goal: Complete 10 Emergency Demonstration Rehabilitation Program projects annually by the end of the third program year.**

Objective 1: Begin Emergency Demonstration Rehabilitation program in Hard Bargain and Natchez Neighborhoods.

Accomplishments: 7 projects completed; 1 project under contract

Breakdown of 09/10 Grant Funds: \$96,938 budgeted; \$73,610 expended

Progress Assessment: Seven (7) rehab projects were completed this third program year and an additional 1 project was under contract at the end of the program year. Including this year, 26 projects in Years 1, 2, and 3 were completed in addition to development of all start up materials, rules, and procedures. One additional project was under contract and has been completed since Year 3 end. It was understood starting a new program would be slow and this led to establishing a goal of annually completing 10 rehab projects by the end of the third program year. The City met 87% of that goal for the three year period. The amount expended for Year 3 includes funds remaining from the 08/09 program year.

**Goal: Identify Community Based Development Organization(s) (CBDOs) by end of the second program year and have two pilot projects started by the end of the third program year.**

Objective 2: Identify and fund a CBDO(s) to either undertake an acquisition/rehabilitation for sale or new construction of a homeowner unit.

Accomplishments: This initiative began in the 2008/2009 program year. The City has made strides during the first three years of the CDBG program to collaborate and work with local organizations that are potential CBDOs, and to include these groups in planning affordable housing initiatives and developing the Consolidated Plan. Three CBDOs are now certified and all three were selected for a funding award under the second or third program years.

During the 2009/2010 third program year, a Request for Proposals with scope of services was drafted, reviewed, and released. One CBDO was selected for a funding award under the third program year to acquire, rehab, and sell two single-family homes.

Breakdown of 09/10 Grant Funds: \$112,244 budgeted; 0 dollars have been expended

Progress Assessment: All funds have been awarded and committed. Because the 2009/2010 award was late in the program year, acquisition and rehabilitation of the properties is expected to begin soon. Funds will be expended throughout the 2010/2011 program year at closing and with the commencement of construction.

**Goal: Start a Homeless and Special Needs Housing and Social Service Assessment by the end of the first program year; assessment completed and published in third program year.**

Objective 3: Begin a Homeless and Special Needs Housing and Social Service Assessment. The assessment should include the identification of the existing inventory of housing and service providers, an estimate of the number of homeless

and special needs populations, the linkages between housing and services, and an evaluation of gaps in housing and services.

Accomplishments: The Assessment was started by the end of the 2007/2008 program year, June 30, 2008. The City began the process of collecting data and working with service providers in late 2007. The first homeless pilot street and shelter count was conducted by City officials and agency volunteers in January 2008. In January 2009 another homeless count was completed. Data from the counts complement the antidotal evidence previously relied upon to assess homeless needs in the jurisdiction. The City also appointed an Affordable Housing Committee to study and make recommendations on housing needs in the community. These two steps of beginning to gather data and engaging key community members, including non-profit developers and housing counselors, are necessary building blocks in the process to develop a needs assessment. Also noteworthy, the City became a State Emergency Shelter Grant entitlement agency and is beginning its third year of contractually working with a local domestic violence shelter and a shelter housing at risk teens.

The first homeless pilot street and shelter counts were conducted by City officials and agency volunteers in January 2008 and 2009. Data from the counts complement the antidotal evidence previously relied upon to assess homeless needs in the jurisdiction.

Breakdown of 08/09 Grant Funds: \$0 budgeted; \$0 expended

Progress Assessment: No funds have been budgeted for this activity since the 2007/2008 program year, and it is expected those originally budgeted funds will be needed during the 2010/2011 program year to publish the Needs Assessment.

**Goal: Conduct a count of homeless persons in January of the second program year [January 2009].**

Objective 4: Conduct a homeless count of sheltered and unsheltered persons in January of the second program year. The count should include the number of chronic homeless persons subpopulation.

Accomplishment: Although this activity was not scheduled to be undertaken until January 2009, City officials and community volunteers conducted a "pilot" point-in-time count during a night in January 2008. This pilot count was a good trial run and much was learned about the mechanics of doing a count: recruiting volunteers, developing easy to use counting forms, covering the geographic areas of the City, and reporting the findings. In addition, the City recruited agency volunteers and required City departments to maintain a log of homeless encounters during the entire month of January 2008. The point-in-time count was repeated in January 2009, and is providing data for the above discussed Special Needs Assessment.

Breakdown of 08/09 Grant Funds: No 08/09 funds were allocated.

Progress Assessment: A count of the homeless population was completed in January 2009.

**Goal: Complete an assessment of the Barriers to Affordable Housing by the end of the first program year.**

Objective 5: Conduct an assessment of the barriers to affordable housing for inclusion in the Consolidated Plan.

Accomplishments: In January 2008, the Franklin Board of Mayor and Alderman appointed an Affordable Housing Committee charged with facilitating affordable housing development in the City. One of the first acts of this committee was to create a Process Subcommittee to identify barriers to affordable housing and recommend actions to address those barriers. Although this is an ongoing planning initiative, the Process Committee has identified the barriers listed to the side:

Breakdown of 08/09 Grant Funds: No 08/09 funds were allocated.

Progress Assessment: The work of the Process Committee on barriers to affordable housing has already resulted in the adoption of a new section of the Zoning Ordinance dealing exclusively with affordable and workforce housing. The section defines common affordable housing terms and as a first step, exempts building permit and plan review fees for affordable housing projects developed by non-profit housing organizations. Perhaps more importantly, by incorporating affordable housing as a section of the City's zoning code, the institutional structure is in place for future codified initiatives. In October and November 2008, two new ordinances were passed that created a "Water and Wastewater System Development and Access Fee Incentive Program" used to establish a Affordable and Workforce Housing Reserve Fund with an amount to be determined annually by the Board of Mayor and Alderman; and a Affordable and Workforce Housing Round-Up Ordinance whereby citizens can voluntarily round-up their monthly water utility bills to the next highest dollar. Additionally, the Process Committee worked with the City on another longer term initiative that addresses barriers in a very substantive way: a new moderately price dwelling unit ordinance that would promotes mixed-income housing developments. That ordinance was passed during the 2009/2010 program year.

- high building, impact, and tap fees;
- land cost and availability;
- zoning ordinance approval process;
- lack of incentives in the zoning ordinance;
- lack of education of why affordable housing is important;
- lack of "clean" property titles;
- high rental rates;
- limited areas for redevelopment, and;
- not-in-my-backyard attitudes.

**Changes to the program as a result of experiences**

Based on input from the public during planning for the Second Annual Update to the Consolidated Plan, it was decided to continue a focus of the rehab program in the

Hard Bargain and Natchez neighborhoods, but also to have it available to other low to moderate income households in Franklin. Additionally, because of the slow start to the rehab program and a lower cost per project than expected, some second year funds were reallocated from that program to the CBDO program scheduled in Year 2. In the second year, funds were allocated during planning for the Third Annual Update to the Consolidated Plan for fair housing counseling, not in response to any fair housing complaints, but rather in recognition of a need to implement more fair housing outreach activities. For the third program year, guidelines for the emergency demonstration rehabilitation program were modified to lower the eligible age and increase the maximum amount of assistance to \$15,000 from \$12,000.

## **Affirmatively Furthering Fair Housing**

### **Impediments**

The City's Analysis of Impediments to Fair Housing Study was updated and submitted to HUD. In general, impediments are grouped in three categories:

1. Poor housing choice for low to moderate income families, with a particular emphasis on affordability. This is unevenly experienced by members of non-majority populations.
2. Lack of awareness and understanding of fair housing laws and responsibilities.
3. Lack of outreach and education within the community regarding fair housing.
4. Lack of a plan and institutional processes for addressing fair housing issues on an ongoing basis.

### **General Actions:**

Beginning in 2008, the City of Franklin hosts an annual Housing Fair at City hall. Advertising for the fair is on the City's Cable Channel 10 and through other various media. The Fair is structured as a public-private partnership, where citizens are welcomed by a diverse group of service providers, including but not limited to, financial service leaders, Community Based Development Organizations, TN Fair Housing Council staff, City community development staff, THDA staff, and local HUD staff. Fair housing information is available at the Fair and workshops/panels provide directed information on fair housing issues.

In 2008, The Mayor of Franklin and the City's Board of Alderman appointed a twenty+ person Affordable Housing Advisory Committee to begin researching and promoting affordable and workforce housing. The committee has a special emphasis on policies that expand housing opportunities for low to moderate income persons, including persons with special needs. Issues around furthering Fair Housing are addressed through the work of three existing and one planned subcommittee.

- *Process Committee* that is charged with identifying and overcoming the barriers to affordable housing. Some of the issues impacting fair housing that are being addressed include: exclusionary policies in the zoning ordinance and; NIMBYism and corresponding education of the community, landlords, and developers; geographic restrictions of housing choices and a lack of rental opportunities; and land cost and availability. This committee is also discussing and has drafted a Moderately Priced Dwelling Unit/inclusionary zoning ordinance.
- *Community and Public Relations Committee* that is charged with educating the public on good land use and zoning policies and procedures that promote both rental and homeownership housing opportunities for all segments of the community.

- *Product Committee* that is charged with developing new housing products to meet the needs of low to moderate income residents and special need populations. This committee is addressing housing counseling needs and has housing counseling representatives that were also participants of the 2008 Fair Housing Matters Conference and sponsors of the City's first housing fair.
- *Fair Housing Committee* was formed in Summer 2008 and charged with: 1) developing an Analysis of Impediments to Fair Housing study, and; 2) overseeing implementation of strategies and actions recommended in the AI study.

The start of Franklin's CDBG program has focused on two target neighborhoods. Both neighborhoods are historic African-American communities and contain the bulk of the city's public housing stock. The City has been working with neighborhood groups and leaders, the public housing authority and its new Executive Director, and housing advocates committed to providing fair and decent housing opportunities and revitalization to those residents.

The City of Franklin does not have the authority to enforce fair housing laws. When a fair housing complaint is received, the city's policy is for the complaint to be delivered to the Neighborhood Resources Coordinator where it is reviewed and the complainant referred to the Tennessee Fair Housing Council for assistance. Persons that feel they have been discriminated against will be referred to file a complaint on line via the HUD web site at [www.hud.gov](http://www.hud.gov) or at the Tennessee Human Rights Commission [www.tn.gov/humanrights](http://www.tn.gov/humanrights). A log is maintained of that action. Beginning this year GAP, a Community Development Resources Company will be engaged when complaints are received. GAP is a locally-based nonprofit housing partner and a certified HUD agent who can also assist complainants with the fair housing complaint process. To date there have been no complaints filed with the City of Franklin. TFHC is a private, non-profit advocacy organization whose mission is to eliminate housing discrimination throughout Tennessee. They give presentations to both landlords and residents regarding fair housing issues. Their advocacy program is based in Nashville and concentrates on Davidson, Rutherford, Sumner, Williamson, and Wilson counties.

#### **Specific Actions Undertaken in the 2008/2009 Program Year:**

1. Coordinated fair housing training and service activities with Franklin Housing Authority
2. Fair Housing public service announcements on Channel 10
3. Fair Housing brochures and materials distributed in the community
4. THDA's TNHousingSearch.org marketing materials and program information are prominently on display in City Hall offices
5. The City of Franklin, TN Fair Housing Council, and GAP Community Development Resources held a training session in August 2009 on the Uniform Residential Landlord and Tenant Act
6. The City has a Fair Housing Task Force as part of the City's Affordable Housing Advisory Committee
7. As part of the Annual Update to the Consolidated Plan for the 2009/2010 program year, CDBG funds were allocated for Fair Housing counseling/training. After a Request for Proposals, an award was made to GAP Community Development Resources to deliver

fair housing outreach and training activities. Those activities during the 2009/2010 program year have included: 450 printed materials on Fair Housing, 350 Spanish translated materials, 6 radio announcements, 1 billboard promoting Fair Housing, advertisement material in local businesses, 2 community workshops, individual counseling, and incorporation of a Fair Housing curriculum in homebuyer education classes.

## **Actions in Strategic Plan or Action Plan taken to address obstacles to meeting underserved needs**

The City's complete focus during the third year of the CDBG program was on implementing and following the goals and objectives presented in the Consolidated Plan. These actions were addressed above in the accomplishments and progress assessment discussions for each of the plan's goals and objectives.

### **Leveraging Resources**

Additional community development resources have been leveraged as a result of the City becoming an entitlement jurisdiction. Receiving a direct entitlement of CDBG funds automatically qualified the City as a State of Tennessee Small City Entitlement Jurisdiction under THDA's Emergency Shelter Grant Program. These funds have been passed on to two local non-profit organizations that in return are required to supply a one-to-one match to their ESG contracted amount. Local CBDOs applied for State HOME funds and received Federal Home Loan Bank funds. These same organizations also use the THDA Community Investment Tax Credit program.

### **Managing the Process**

1. Describe actions taken during the last year to ensure compliance with program and comprehensive planning requirements.

Program Year 3 CAPER Managing the Process response:

### **Actions taken to ensure compliance with program and comprehensive planning requirements**

Key staff members attended a number of trainings, conferences, workshops, etc., to further educate themselves in the fields of community development and affordable housing. In no particular order, a sampling of these include: a workforce housing conference in Louisville; several classes in real estate and neighborhood development through the International Economic Development Council; NeighborWorks training; and State of Tennessee workshops on ESG, economic and community development funding, and Fair Housing.

The City has a Consolidated Planning Process plan which provides for, and encourages, citizen participation and which emphasizes participation by persons of low- or moderate-income. The plan:

- provides citizens with access to local meetings, information, and records related to the use of funds;
- provides for public hearings to obtain citizen views and to answer questions at all stages of the consolidated planning process, including the development of needs, the review of proposed activities, and review of program performance;
- provides for timely written answers to written complaints and grievances; and
- addresses how the needs of non-English speaking residents will be met at public hearings.

## Citizen Participation

1. Provide a summary of citizen comments.
2. In addition, the performance report provided to citizens must identify the Federal funds made available for furthering the objectives of the Consolidated Plan. For each formula grant program, the grantee shall identify the total amount of funds available (including estimated program income), the total amount of funds committed during the reporting period, the total amount expended during the reporting period, and the geographic distribution and location of expenditures. Jurisdictions are encouraged to include maps in describing the geographic distribution and location of investment (including areas of minority concentration). The geographic distribution and expenditure requirement may also be satisfied by specifying the census tracts where expenditures were concentrated.

\*Please note that Citizen Comments and Responses may be included as additional files within the CPMP Tool.

Program Year 3 CAPER Citizen Participation response:

### Summary of Citizen Comments

A public hearing on the Consolidated Annual Performance and Evaluation Report was held on September 7, 2010. The following comments were received:

- {Insert comments}

### Summary of Funds and Expenditures

Program	Budgeted Funds	Program Income	Committed Funds	Expended Funds	Geographic Distribution
<b>Emergency Rehabilitation</b>	\$96,938	\$0	\$96,938	\$73,610	Approx. 1/3 projects are in Hard Bargain or Natchez Neighborhoods *
<b>Homeless and Special Needs Assessment</b>	\$0	\$0	\$0	\$0	Not Applicable
<b>CBDO</b>	\$112,244	\$0	\$112,244	\$0	Low to

<b>Program</b>					moderate income Neighborhoods
<b>Fair Housing Counseling</b>	\$15,306	\$0	\$15,306	\$6,269	Not Applicable
<b>Administration</b>	\$51,014	\$0	\$51,014	\$25,000	Not Applicable
<b>TOTAL</b>	\$275,502	\$0	\$275,502	\$104,879	

\* U.S. Census Tracts 050600 and 050800

## Institutional Structure

1. Describe actions taken during the last year to overcome gaps in institutional structures and enhance coordination.

Program Year 3 CAPER Institutional Structure response:

### Gaps in Institutional Structures

There were no substantial changes to the institutional structure for delivering Consolidated Plan programs from that outlined in the 2007-2010 Franklin Strategic Plan (the original Consolidated Plan). The identification of gaps is part of the City's ongoing assessment and evaluation of the program as it evolves, and is addressed in succeeding Consolidated Plan updates and Performance Reports.

Coordination has been enhanced by appointment of the Affordable Housing Committee in January 2008 that includes representatives from the City, private and non-profit development community, neighborhood groups, real estate professionals, counseling agencies, private citizens, and other housing professionals. The creation of subcommittees to this Committee has also brought additional stakeholders into the process of planning for affordable housing and community development needs. Contracting with local non-profit organizations to operate the Emergency Rehabilitation Program, develop projects as CBDOs, and provide Fair Housing counseling and outreach is also building the capacity and effectiveness of the institutional structure for delivering affordable housing and community development programs within the City.

Contracting with a local non-profit organization to operate the Emergency Rehabilitation program builds the capacity and effectiveness of the institutional structure that delivers affordable housing and community development programs within the City.

Additionally, the City hired a Housing Development Coordinator, that person accepted another temporary position within the City of Franklin. The position has been temporarily filled with an employee who has extensive knowledge of affordable/workforce housing and is active in the community. ~~and has recently advertised again for that position as the initial Coordinator accepted another position in City government.~~ The position was created to coordinate the workforce and affordable housing and modernization programs for the City of Franklin. The Housing

Development Coordinator is responsible for the coordination and supervision of all activities involved in the implementation of affordable, workforce, and housing modernization/rehabilitation programs. Work will involve the preparation of conceptual program designs, soliciting participation in programs, coordinating proposals with various City, State and Federal agencies for approval of funding assistance, developing strategies for joint participation and financial planning, design analysis, negotiation of development agreements with private and non-profit developers, economic viability analyses, and oversight of construction and redevelopment budgets, and facility management.

## Monitoring

1. Describe how and the frequency with which you monitored your activities.
2. Describe the results of your monitoring including any improvements.
3. Self Evaluation
  - a. Describe the effect programs have in solving neighborhood and community problems.
  - b. Describe progress in meeting priority needs and specific objectives and help make community's vision of the future a reality.
  - c. Describe how you provided decent housing and a suitable living environment and expanded economic opportunity principally for low and moderate-income persons.
  - d. Indicate any activities falling behind schedule.
  - e. Describe how activities and strategies made an impact on identified needs.
  - f. Identify indicators that would best describe the results.
  - g. Identify barriers that had a negative impact on fulfilling the strategies and overall vision.
  - h. Identify whether major goals are on target and discuss reasons for those that are not on target.
  - i. Identify any adjustments or improvements to strategies and activities that might meet your needs more effectively.

Program Year 3 CAPER Monitoring response:

## Monitoring of Activities

The activities performed by an outside contractor or subrecipient are the Emergency Demonstration Rehabilitation Program, CBDO projects, and the Fair Housing Counseling and Outreach Program. Throughout most of the first and second program years staff time was dedicated to establishing program rules and procedures, bidding the operation of the programs, executing contracts, and soliciting participants for the three programs. The first rehabilitation projects were bid and completed in May and June 2008. City staff has been integrally involved with the grantee on getting the program up and running, with weekly and often more frequent meetings occurring at the grantee's office and at applicant work sites. ~~The City of Franklin met with full staff of Community Housing Partnership with a no finding, additionally John Baldwin from HUD met with CHP staff for both the CDBG and CBDO program; Mr. Baldwin praised the City and CHP for their work.~~ ~~[Add sentence or two about CHP monitoring visit]~~ The CBDO program was started in the second program year and the City in a similar fashion to the rehabilitation program

has been integrally involved with the grantees in program start-up issues and during the design and construction processes. ~~{Add sentence or two about CBDO monitoring visit(s)}~~ The Fair Housing program was just started during the third program year and the City has had similar involvement as described above. Since this program has been in operation for less than a year and is for a limited amount, the City has not scheduled a formal monitoring visit, but instead has been focused on proper invoicing and payment procedures with this contractor. A monitoring visit will be scheduled during the current program year.

## **Self Evaluation**

**The effect programs have in solving neighborhood and community problems.** Emergency rehabilitation was selected for funding because it has a more immediate and visible impact on solving neighborhood and community problems. With the modest amount of funds available, doing something quick and that residents can see is the best way to jumpstart a bigger revitalization of the neighborhood. It also has an immediate and dramatic impact on the lives of the families that are assisted and allows them to remain in their homes. It is anticipated that making improvements on a few properties will encourage other property owners to invest their personal funds in their properties, and encourage new investment and construction in the area. Several new homes have been or are planned to be constructed in both the Hard Bargain and Natchez Neighborhoods through the CBDO program.

**Meeting priority needs and specific objectives and helping make the community's vision of the future a reality.** Progress toward meeting specific Consolidated Plan objectives was discussed in a previous section. There were five priority housing needs identified in the Consolidated Plan: 1) Assistance to extremely low and low income homeowners, particularly the elderly; 2) Assistance to moderate income homeowners; 3) Assistance to moderate income renters; 4) Assistance to extremely low and low income renters, particularly elderly and small households with higher cost burdens. Obviously, not all the issues facing these groups can be solved with the City's limited amount of CDBG funds. However, assistance to the first group is the target of the Emergency Rehabilitation Program and getting it established has been the focus of first year efforts. The CBDO program, discussed earlier and started in the 2008/2009 program year, is largely designed to assist the third group, who as renters with moderate incomes can become first-time homeowners with some assistance. In addition, the Fair Housing Counseling and Outreach Program targets renters to help them understand their rights and responsibilities. Some of the City's plans to address barriers to affordable housing will be of assistance to the second group, moderate income homeowners, who by virtue of higher incomes stand to be more impacted by procedural type initiatives that lower the costs of developing affordable housing.

**Providing decent housing and a suitable living environment and expanded economic opportunity principally for low and moderate income persons.** All of the Consolidated Plan objectives are categorized as Decent Housing for reporting purposes. The two funded CDBG projects, the Emergency Demonstration Rehabilitation Program and the Needs Assessment of Homeless and Special Needs Populations are both about providing decent housing for specific populations. The rehab program is by definition making decent housing out of substandard housing. The Needs Assessment upon completion will identify the existing inventory of housing and services, an estimate of the number of homeless persons and special

needs populations, the linkages between housing and services, and an evaluation of the gaps in housing and services. As previously discussed, some of the initial data gathering and collaborations needed to conduct the Needs Assessment is underway.

Although the Consolidated Plan objectives are categorized as Decent Housing, they certainly also make for a suitable living environment and expand economic opportunity. Housing does not occur in a vacuum, but rather has a positive or negative impact on the environment in which it is located. Decent housing is a necessary building block to a suitable living environment and offers the stable personal and financial setting that enables individuals to contribute to neighborhood-wide improvement programs. Likewise, it is nearly impossible for a low to moderate income person to take advantage of economic opportunities if they are in an unstable living arrangement.

**Activities falling behind schedule.** No activities are considered to be behind schedule. As discussed previously, the Emergency Demonstration Rehabilitation Program is generally on schedule, with the understanding that the nature of an ongoing rehab program bridges program years. The CBDO program, while slower than expected, has completed its certification of CBDOs, completed two Request For Proposal processes to solicit applications for funds, selected CBDO proposals to fund, entered into agreements with those non-profit partners, and has completed its first project during the 2009/2010 program year. The Fair Housing program is on schedule and funds are being expended in a timely manner.

**How activities and strategies made an impact on identified needs.** Please refer to previous answers in this section on progress towards meeting the needs and objectives outlined in the Consolidated Plan.

**Indicators that would best describe the results.**

Activity/Objective	Indicator(s)
Emergency Demonstration Rehabilitation Program	<ul style="list-style-type: none"> <li>• Cases completed</li> <li>• Cases under contract</li> <li>• Number of applications</li> <li>• Number of households &amp; persons assisted</li> </ul>
Community Based Development Organization (CBDO) Program	<ul style="list-style-type: none"> <li>• CBDOs identified and selected</li> <li>• Units developed</li> <li>• Units under agreement to be developed</li> <li>• Number of households &amp; persons assisted</li> </ul>
Homeless and Special Needs Housing and Social Service Assessment	<ul style="list-style-type: none"> <li>• Planning underway</li> <li>• Draft document</li> <li>• Completed public document</li> </ul>
Homeless Count	<ul style="list-style-type: none"> <li>• Point-in-time count logistical process in place</li> <li>• Count undertaken</li> <li>• Data from count analyzed and presented</li> </ul>
Assessment of Barriers to Affordable Housing	<ul style="list-style-type: none"> <li>• Planning underway</li> <li>• Draft document</li> <li>• Completed public document</li> </ul>
Fair Housing Counseling and Outreach Program	<ul style="list-style-type: none"> <li>• Number of Materials produced and advertisements in public locations</li> <li>• Number of community workshops</li> <li>• Number of counseled clients</li> </ul>

**Barriers that had a negative impact on fulfilling the strategies and overall vision.** No significant barriers have been identified. There are several issues being addressed by the Emergency Rehab Program that while not quite rising to the level of barriers, are noteworthy. These include: housing in need of rehab with long-time “owners” but unclear property titles; soliciting building contractors for “smallish federally funded jobs” in what has been a lucrative private market; and in neighborhoods where public assistance programs haven’t been as easily available, selling a somewhat skeptical pool of participants on the altruistic aim of the program.

**Major goals that are on target and reasons for those that are not.**

Goals	Status	Comments
10 Rehab projects annually by end of Year 3	80% of goal met Year 3; 87% met over Years 1,2,3 combined	Policies and procedures in place, Program manager selected, 8 projects completed or under contract in Year 3
Identify CBDOs by end of Year 2	On target	Four local non-profit organizations have been certified as CBDOs thru Year 3
2 CBDO pilot projects started by end of Year 3	On target	Two CBDOs acquired property for development, one single-family homebuyer project completed
Homeless and Special Needs Assessment started by end of Year 1	On target	Data collection underway with analysis of information from 2008 and 2009 homeless counts
Homeless and Special Needs Assessment completed in Year 2	On target	Data available with analysis of information from 2008 and 2009 homeless counts
Homeless count conducted in January of Year 2	On target	Pilot point-in-time and monthly count conducted in January of Year 1, homeless count conducted in January of Year 2
Assessment of Barriers to Affordable Housing completed by end of Year 2	On target	List of barriers identified, several solutions implemented, further analysis and recommendations underway
Implement fair housing outreach program in Year 3	On target	Request for proposals released and award made, agreement executed with local non-profit agency, various media and advertising activities undertaken
Counsel 15 households in fair housing/housing issues in Year 3	On target	23 attendants at 2 workshops, 6 households attended classes, 6 households counseled

**Adjustments or improvements to strategies and activities.** Because the City’s CDBG program was just getting established, no notable adjustments or changes to any activities were made during the first program year. As approved in the Annual Update to the Consolidated Plan, adjustments to the goals and funding for the Emergency Rehabilitation and CBDO programs were made for Year 2. This involved allocating funds for the Rehab program to the CBDO program with a corresponding reduction of rehab projects to 10 each for Years 2 and 3 and an increase in CBDO projects. As approved in the second Annual Update to the Consolidated Plan, a

smallish amount of CDBG funds were allocated for fair housing counseling in the 2009/2010 program year.

## **Lead-based Paint**

1. Describe actions taken during the last year to evaluate and reduce lead-based paint hazards.

Program Year 3 CAPER Lead-based Paint response:

### **Actions taken to evaluate and reduce lead-based paint hazards**

The following excerpt is from the Policies and Procedures Manual for the Emergency Rehabilitation Program: When applicable, the work will also include testing, remediating, and clearing structures for lead-based paint hazards. All structures constructed pre-1978 must be tested and cleared for lead-based paint hazards. In the presence of lead-based paint hazards, contractors/workers are required to be certified in and use safe-work practices. Applicants are also being provided with the EPA brochure entitled Protect Your Family From Lead In Your Home.

All funded Emergency Rehabilitation projects are having a lead based paint test that is documented in each project book. That report is provided to the homeowner. If there is lead based paint where any rehabilitation activity is being done then it is contained during the activity, however this has been rare. There has been one instance when windows that were being replaced had lead based paint and they were removed in accordance with required practices and taken to the approved (lined) landfill.

## **HOUSING**

### **Housing Needs**

\*Please also refer to the Housing Needs Table in the Needs.xls workbook.

1. Describe Actions taken during the last year to foster and maintain affordable housing.

Program Year 3 CAPER Housing Needs response:

### **Actions to Foster and Maintain Affordable Housing**

The goals established in the Housing Needs Table in the Consolidated Plan for Year 1 were to directly assist homeowners with incomes from 0% to 50% of the median family income. The Emergency Demonstration Rehabilitation Program targets elderly households with incomes less than 50% of the median family income. The Housing Needs Table also shows relatively large numbers of moderate income renters (50% to 80% median family income) with housing needs. The CBDO program started in Year 2 is largely targeted to those households; the program provides funding to non-profit organizations developing affordable homebuyer housing. The Fair Housing Counseling and Outreach program addresses the education of renters of all incomes, but particularly those below 80% of the median family income. The Barriers to

Affordable Housing Study is addressing the housing needs of every subpopulation of households with incomes less than 80% of the median family income by developing strategies to facilitate development of housing affordable across income strata. An example of this is the newly enacted City ordinance to waive the building permit review fees for housing that is to be affordable to households with incomes less than 80% of median family income.

### Specific Housing Objectives

1. Evaluate progress in meeting specific objective of providing affordable housing, including the number of extremely low-income, low-income, and moderate-income renter and owner households comparing actual accomplishments with proposed goals during the reporting period.
2. Evaluate progress in providing affordable housing that meets the Section 215 definition of affordable housing for rental and owner households comparing actual accomplishments with proposed goals during the reporting period.
3. Describe efforts to address “worst-case” housing needs and housing needs of persons with disabilities.

Program Year 3 CAPER Specific Housing Objectives response:

### Progress in providing housing to targeted income strata

Emergency Rehabilitation Program 2008-2009 Program Year					
Income	Goal	Accomplishment	Race	Elderly	Family Type
Extremely low income <=30% MFI	5	3 completed	Black =2	2 >=55 3=disabled	Small Related =3
Low income >30 to <=50% MFI	5	4 completed 1 under contract	Black =3	4 >=55 1=disabled	Small Related =5
Moderate Income >50 to <=80% MFI	0	0 completed			

### Progress in providing housing that meets Section 215

This is applicable to entitlement jurisdictions receiving HOME Investment Partnership funds. The City of Franklin does not receive HOME funds. However, all of the program participants in the Emergency Rehabilitation Program would meet the income criteria established for homeowners in Section 215, and be well within the maximum property value limits.

### Efforts to address “worst case” housing needs and housing needs of persons with disabilities

Most noteworthy in the effort to address “worst case” housing needs is the City’s receipt of Emergency Shelter Grant funds through the State of Tennessee, which are being used to meet the housing needs of domestic violence victims and persons recently incarcerated in correctional facilities.

The Emergency Rehabilitation Program is restricted to low income elderly persons and households with a disabled member. Four (4) of the 8 rehab cases completed or under contract were for disabled households. Other than by income as presented in the previous section, the Consolidated Plan did not set goals for “worst case” housing needs or housing needs for disabled persons. The Homeless Counts completed in January 2008 and 2009 help assess the demand and needs for housing by persons experiencing homelessness. Most noteworthy in the effort to address “worst case” housing needs is the City’s receipt of Emergency Shelter Grant funds through the State of Tennessee, which are being used to meet the housing needs of domestic violence victims and at risk teens.

## **Public Housing Strategy**

1. Describe actions taken during the last year to improve public housing and resident initiatives.

Program Year 3 CAPER Public Housing Strategy response:

## **Public Housing and Public Housing Resident Initiatives**

The Franklin Housing Authority’s lease and all related policies comply with the requirements of the Quality Housing and Work Responsibility Act (QHWRA). Policies address deconcentration and income mixing, thereby encouraging higher income families in the developments. Although the FHA has provided incentives for higher income families, the majority of their applicants are from the extremely low income levels. All policies are reviewed on a regular basis.

### **Capital Fund Program**

Funding under the Capital Fund Program is approximately \$487,000. The Authority’s primary focus under the FY 2010 Annual Plan is to construct a new maintenance facility and to support its redevelopment activities.

### **Revitalization and Redevelopment**

Over the next five years, it is the intent of the Franklin Housing Authority to demolish all 297 units of public housing and to redevelop them with a mixed income approach. FHA intends to use their 56+ acres to rebuild 308 public housing units. FHA has hired a master developer to assist in putting together a master plan for transforming Franklin’s public housing. The plan is to rebuild back 308 units of public housing as well as to create more affordable, workforce housing, and ownership opportunities. FHA will seek to purchase property off-site for replacement housing. No demolition will occur until such time that replacement housing is deemed obtainable.

### **Homeownership and Resident Involvement**

The Franklin Housing Authority encourages its residents to enter paths toward self-sufficiency. Preferences exist for families working or engaging in training or education programs for non-housing programs operated or coordinated by the Authority. Although the Authority has no current homeownership program, they encourage their residents to pursue that dream and as mentioned in the previous section are hoping to include a homeownership component in the redevelopment of their property. The Authority also works with outside and/or resident

organizations for the provision of crime and drug prevention activities, as well as activities targeted to at-risk youth, adults, and seniors.

## **Barriers to Affordable Housing**

1. Describe actions taken during the last year to eliminate barriers to affordable housing.

Program Year 3 CAPER Barriers to Affordable Housing response:

### **Eliminating Barriers to Affordable Housing**

In January 2008, the Franklin Board of Mayor and Alderman appointed an Affordable Housing Committee charged with facilitating affordable housing development in the City. One of the first acts of this committee was to create a Process Subcommittee to identify barriers to affordable housing and recommend actions to address those barriers. Although this is an ongoing planning initiative, the Process Committee has identified the barriers listed in the box to the right:

high building, impact, and tap fees; land cost and availability; zoning ordinance approval process; lack of incentives in the zoning ordinance; lack of education of why affordable housing is important; lack of "clean" property titles; high rental rates; limited areas for redevelopment, and; not-in-my-backyard attitudes.

The work of the Process Committee on barriers to affordable housing has already resulted in the adoption of a new section of the Zoning Ordinance dealing exclusively with affordable and workforce housing. The section defines common affordable housing terms and as a first step, exempts building permit and plan review fees for affordable housing projects developed by non-profit housing organizations. Perhaps more importantly, by incorporating affordable housing as a section of the City's zoning code, the institutional structure is in place for future codified initiatives. In October and November 2008, two new ordinances were passed that created a "Water and Wastewater System Development and Access Fee Incentive Program" used to establish a Affordable and Workforce Housing Reserve Fund with an amount to be determined annually by the Board of Mayor and Alderman; and a Affordable and Workforce Housing Round-Up Ordinance whereby citizens can voluntarily round-up their monthly water utility bills to the next highest dollar. Additionally, the Process Committee is working with the City on two other longer term initiatives that would address barriers in a very substantive way: a new Transfer of Development Rights ordinance and a moderately price dwelling unit ordinance that would promote mixed-income housing developments. The ordinance establishing a moderately priced dwelling unit program was passed and became a part of the City's zoning code in 2010.

### **HOME/ American Dream Down Payment Initiative (ADDI)**

1. Assessment of Relationship of HOME Funds to Goals and Objectives

- a. Evaluate progress made toward meeting goals for providing affordable housing using HOME funds, including the number and types of households served.
2. HOME Match Report
  - a. Use HOME Match Report HUD-40107-A to report on match contributions for the period covered by the Consolidated Plan program year.
3. HOME MBE and WBE Report
  - a. Use Part III of HUD Form 40107 to report contracts and subcontracts with Minority Business Enterprises (MBEs) and Women's Business Enterprises (WBEs).
4. Assessments
  - a. Detail results of on-site inspections of rental housing.
  - b. Describe the HOME jurisdiction's affirmative marketing actions.
  - c. Describe outreach to minority and women owned businesses.

Program Year 3 CAPER HOME/ADDI response:

The City of Franklin does not receive ADDI funds.

## HOMELESS

### Homeless Needs

\*Please also refer to the Homeless Needs Table in the Needs.xls workbook.

1. Identify actions taken to address needs of homeless persons.
2. Identify actions to help homeless persons make the transition to permanent housing and independent living.
3. Identify new Federal resources obtained from Homeless SuperNOFA.

Program Year 3 CAPER Homeless Needs response:

### **Actions taken to address the needs of homeless persons**

City officials and community volunteers conducted a "pilot" point-in-time count during a night in January 2008. This pilot count was a good trial run and much was learned about the mechanics of doing a count: recruiting volunteers, developing easy to use counting forms, covering the geographic areas of the City, and reporting the findings. In addition, the City recruited agency volunteers and required City departments to maintain a log of homeless encounters during the entire month of January 2008. The point-in-time count was repeated in January 2009 and provided data for the previously discussed Special Needs Assessment.

### **Actions to help homeless persons make the transition to permanent housing and independent living**

At this point in the development of services for homeless persons in the City of Franklin, focus is on working with the few existing providers to get persons in danger of or that are experiencing homelessness into the service system. Receiving Emergency Shelter Grant funds through the State is an important step forward in this effort. In addition, the recently completed Consolidated Plan for 2010-2015 planned to allocate CDBG funds for homeless activities during that consolidated planning period. Likewise, the Homeless and Special Needs Housing and Services Assessment will develop strategies for helping the homeless become self-sufficient. This assessment will identify gaps in the numbers of persons experiencing homelessness and their housing needs to existing resources available in the community and region.

## **Federal Resources obtained from Homeless SuperNOFA**

No new resources were obtained from the SuperNOFA

## **Specific Homeless Prevention Elements**

1. Identify actions taken to prevent homelessness.

Program Year 3 CAPER Specific Housing Prevention Elements response:

### **Actions taken to prevent homelessness**

The Emergency Shelter Grant funds received from the State and allocated to agencies servicing domestic violence victims and at risk teens directly addresses two groups of persons who otherwise would be likely candidates for recurring episodes of homelessness.

The City also works with two local non-profit organizations on several initiatives that help prevent homelessness. Through the efforts of one agency, funding is available to provide emergency housing in a hotel for up to three nights. During that time, efforts are made to find more stable living arrangements. Transportation may also be provided to Nashville shelters where a larger array of services and resources are available. The City also works closely with a local housing counseling agency and staff serves on a task force formed by that group to address the foreclosure crisis. The counseling agency is a THDA certified foreclosure counselor and is working with in-trouble homeowners to keep their homes or in a worst-case scenario, find suitable alternative living arrangements.

## **Emergency Shelter Grants (ESG)**

1. Identify actions to address emergency shelter and transitional housing needs of homeless individuals and families (including significant subpopulations such as those living on the streets).
2. Assessment of Relationship of ESG Funds to Goals and Objectives
  - a. Evaluate progress made in using ESG funds to address homeless and homeless prevention needs, goals, and specific objectives established in the Consolidated Plan.

- b. Detail how ESG projects are related to implementation of comprehensive homeless planning strategy, including the number and types of individuals and persons in households served with ESG funds.
3. Matching Resources
  - a. Provide specific sources and amounts of new funding used to meet match as required by 42 USC 11375(a)(1), including cash resources, grants, and staff salaries, as well as in-kind contributions such as the value of a building or lease, donated materials, or volunteer time.
4. State Method of Distribution
  - a. States must describe their method of distribution and how it rated and selected its local government agencies and private nonprofit organizations acting as subrecipients.
5. Activity and Beneficiary Data
  - a. Completion of attached Emergency Shelter Grant Program Performance Chart or other reports showing ESGP expenditures by type of activity. Also describe any problems in collecting, reporting, and evaluating the reliability of this information.
  - b. Homeless Discharge Coordination
    - i. As part of the government developing and implementing a homeless discharge coordination policy, ESG homeless prevention funds may be used to assist very-low income individuals and families at risk of becoming homeless after being released from publicly funded institutions such as health care facilities, foster care or other youth facilities, or corrections institutions or programs.
  - c. Explain how your government is instituting a homeless discharge coordination policy, and how ESG homeless prevention funds are being used in this effort.

Program Year 3 CAPER ESG response:

### **Program Year 3 CAPER ESG response:**

The City does not receive ESG funds from the U.S. Department of Housing and Urban Development. ESG funds from the State of Tennessee were first received in Summer 2008 and were not awarded prior to the end of the City's Consolidated Plan reporting period for the 2008-2009 program year. The City anticipates continuing to receive State ESG funds as part of their small city entitlement program.

## **COMMUNITY DEVELOPMENT**

### **Community Development**

\*Please also refer to the Community Development Table in the Needs.xls workbook.

1. Assessment of Relationship of CDBG Funds to Goals and Objectives
  - a. Assess use of CDBG funds in relation to the priorities, needs, goals, and specific objectives in the Consolidated Plan, particularly the highest priority activities.
  - b. Evaluate progress made toward meeting goals for providing affordable housing using CDBG funds, including the number and types of households served.

- c. Indicate the extent to which CDBG funds were used for activities that benefited extremely low-income, low-income, and moderate-income persons.
2. Changes in Program Objectives
  - a. Identify the nature of and the reasons for any changes in program objectives and how the jurisdiction would change its program as a result of its experiences.
3. Assessment of Efforts in Carrying Out Planned Actions
  - a. Indicate how grantee pursued all resources indicated in the Consolidated Plan.
  - b. Indicate how grantee provided certifications of consistency in a fair and impartial manner.
  - c. Indicate how grantee did not hinder Consolidated Plan implementation by action or willful inaction.
4. For Funds Not Used for National Objectives
  - a. Indicate how use of CDBG funds did not meet national objectives.
  - b. Indicate how did not comply with overall benefit certification.
5. Anti-displacement and Relocation – for activities that involve acquisition, rehabilitation or demolition of occupied real property
  - a. Describe steps actually taken to minimize the amount of displacement resulting from the CDBG-assisted activities.
  - b. Describe steps taken to identify households, businesses, farms or nonprofit organizations who occupied properties subject to the Uniform Relocation Act or Section 104(d) of the Housing and Community Development Act of 1974, as amended, and whether or not they were displaced, and the nature of their needs and preferences.
  - c. Describe steps taken to ensure the timely issuance of information notices to displaced households, businesses, farms, or nonprofit organizations.
6. Low/Mod Job Activities – for economic development activities undertaken where jobs were made available but not taken by low- or moderate-income persons
  - a. Describe actions taken by grantee and businesses to ensure first consideration was or will be given to low/mod persons.
  - b. List by job title of all the permanent jobs created/retained and those that were made available to low/mod persons.
  - c. If any of jobs claimed as being available to low/mod persons require special skill, work experience, or education, provide a description of steps being taken or that will be taken to provide such skills, experience, or education.
7. Low/Mod Limited Clientele Activities – for activities not falling within one of the categories of presumed limited clientele low and moderate income benefit
  - a. Describe how the nature, location, or other information demonstrates the activities benefit a limited clientele at least 51% of whom are low- and moderate-income.
8. Program income received
  - a. Detail the amount of program income reported that was returned to each individual revolving fund, e.g., housing rehabilitation, economic development, or other type of revolving fund.
  - b. Detail the amount repaid on each float-funded activity.

- c. Detail all other loan repayments broken down by the categories of housing rehabilitation, economic development, or other.
  - d. Detail the amount of income received from the sale of property by parcel.
9. Prior period adjustments – where reimbursement was made this reporting period for expenditures (made in previous reporting periods) that have been disallowed, provide the following information:
  - a. The activity name and number as shown in IDIS;
  - b. The program year(s) in which the expenditure(s) for the disallowed activity(ies) was reported;
  - c. The amount returned to line-of-credit or program account; and
  - d. Total amount to be reimbursed and the time period over which the reimbursement is to be made, if the reimbursement is made with multi-year payments.
10. Loans and other receivables
  - a. List the principal balance for each float-funded activity outstanding as of the end of the reporting period and the date(s) by which the funds are expected to be received.
  - b. List the total number of other loans outstanding and the principal balance owed as of the end of the reporting period.
  - c. List separately the total number of outstanding loans that are deferred or forgivable, the principal balance owed as of the end of the reporting period, and the terms of the deferral or forgiveness.
  - d. Detail the total number and amount of loans made with CDBG funds that have gone into default and for which the balance was forgiven or written off during the reporting period.
  - e. Provide a List of the parcels of property owned by the grantee or its subrecipients that have been acquired or improved using CDBG funds and that are available for sale as of the end of the reporting period.
11. Lump sum agreements
  - a. Provide the name of the financial institution.
  - b. Provide the date the funds were deposited.
  - c. Provide the date the use of funds commenced.
  - d. Provide the percentage of funds disbursed within 180 days of deposit in the institution.
12. Housing Rehabilitation – for each type of rehabilitation program for which projects/units were reported as completed during the program year
  - a. Identify the type of program and number of projects/units completed for each program.
  - b. Provide the total CDBG funds involved in the program.
  - c. Detail other public and private funds involved in the project.
13. Neighborhood Revitalization Strategies – for grantees that have HUD-approved neighborhood revitalization strategies
  - a. Describe progress against benchmarks for the program year. For grantees with Federally-designated EZs or ECs that received HUD approval for a neighborhood revitalization strategy, reports that are required as part of the EZ/EC process shall suffice for purposes of reporting progress.

Program Year 3 CAPER Community Development response:

## Community Development Responses

### Assessment of Relationship of CDBG fund to Goals and Objectives

Other than for program administration, CDBG funds were not used for non-housing community development needs. Housing needs, particularly the rehabilitation of existing owner units and the production of new owner units, were identified in the Consolidated Plan Community Development Table as the high priority needs. As presented elsewhere throughout this report the Emergency Demonstration Rehabilitation Program addresses the need to rehabilitate existing owner occupied housing units, particularly those of elderly homeowners with extremely low and low incomes. The table below shows progress made under the rehab program toward meeting affordable housing goals and how those funds were used to benefit different income groups. The CBDO program started in Year 2, as also discussed in other sections of this report, is targeted to the production of new owner units.

Emergency Rehabilitation Program 2008-2009 Program Year					
Income	Goal	Accomplishment	Race	Elderly	Family Type
Extremely low income <=30% MFI	5	3 completed	Black =2	2 >=55 3=disabled	Small Related =3
Low income >30 to <=50% MFI	5	4 completed 1 under contract	Black =3	4 >=55 1=disabled	Small Related =5
Moderate Income >50 to <=80% MFI	0	0 completed			

### Changes in Program Objectives

Based on input from the public during planning for the First Annual Update to the Consolidated Plan, it was decided to continue a focus of the rehab program in the Hard Bargain and Natchez neighborhoods, but also to have it available to other low to moderate income households in Franklin. Additionally, because of the slow start to the rehab program and a lower cost per project than expected, some second year funds were reallocated from that program to the CBDO program scheduled in Year 2. As approved in the Annual Update to the Consolidated Plan, adjustments to the goals and funding for the Emergency Rehabilitation and CBDO programs were made for Year 2. This involved allocating funds for the Rehab program to the CBDO program with a corresponding reduction of rehab projects to 10 each for Years 2 and 3 and an increase in CBDO projects. As part of the planning process for the second Annual Update to the Consolidated Plan, CDBG funds were allocated for fair housing counseling activities, mainly to increase outreach and awareness of fair housing issues.

### Assessment of Efforts in Carrying Out Planned Actions

The City has used a variety of resources in undertaking its CDBG and affordable housing initiatives. The Emergency Rehabilitation Program is being operated by a local non-profit organization with experience in community development and affordable housing programs. Their expertise in working with the community, inspecting homes, doing work write-ups, and overseeing the work of building contractors has been invaluable. In doing the homeless counts, volunteers from the

community and several local agencies conducted the counts in the early morning hours of a mid-January night. The Needs Assessment and the analysis of barriers to affordable housing are ongoing efforts of the Affordable Housing Task Force, which is a twenty+ member committee appointed by the Board of Mayor and Alderman and composed of residents, representatives of neighborhood and non-profit organizations, local lenders, the public housing authority, city government, and area builders and developers of housing. The CBDO program is reliant upon the work of certified non-profits to perform housing development activities. The Fair Housing Counseling and Outreach program is operated by another local non-profit service agency certified homeowner counseling and foreclosure counseling. ESG funds from the State of Tennessee are resources available to address homelessness in the City. In addition, a same local non-profit housing counselor received a grant from THDA to provide foreclosure counseling to residents in danger of losing their homes.

The City provides Certifications of Consistency to the Consolidated Plan on a case-by-case basis upon request. Staff reviews the request and assesses whether or not the application is for a program or initiative that is consistent with the goals and objectives of the Consolidated Plan, and whether or not the project is for persons with incomes at or below 80% of the median family income, or for neighborhoods with a majority of households at 80% or less of MFI.

The City is not aware of any actions or willful inactions it has taken to hinder Consolidated Plan implementation.

#### **Funds Not Used for National Objectives**

All funds used went to meet a national objective.

#### **Anti-displacement and Relocation**

No displacement or relocation occurred on projects funded through the Consolidated Plan programs. The Emergency Rehabilitation Program is minor rehab with a maximum grant of \$12,000.

#### **Low/Mod Job Activities**

No economic development activities were funded through the Consolidated Plan programs.

#### **Low/Mod Limited Clientele Activities**

The Emergency Demonstration Rehabilitation Program serviced all low/mod clients. Each rehab case was for a low/moderate income household and household income was certified on an individual case basis. GAP counseled 6 clients, processed 1 complaint, held two Community Workshops with 23 attendees and held two Homebuyer Education Classes regarding Fair Housing. United Community Resource Foundation sold a home in the Natchez neighborhood to a qualified buyer for \$120,000. UCRF has an additional two lots available for building in the Natchez neighborhood. [Insert low/mod info. on UCRF house and on clients counseled by GAP] All participating households were certified as having gross incomes below 80% of the median family income using the Section8/Part 5 definition of annual income.

#### **Program Income received**

No program income was received during the 2009-2010 program year.

#### **Prior period adjustments**

No prior period adjustments were made during the 2009-2010 program year.

**Loans and other receivables**

No loans have been made using Consolidated Plan program funds; the City has no outstanding loans from the use of Consolidated Plan program funds. No properties owned by the City or any subrecipient were acquired or improved using CDBG funds.

**Lump sum agreements**

The City has no lump sum agreements.

**Housing Rehabilitation**

Emergency Rehabilitation Program	
Participant Income	Units Completed
Extremely low income <=30% MFI	<b>3 completed</b>
Low income >30 to <=50% MFI	<b>4 completed</b> 1 under contract
Moderate Income >50 to <=80% MFI	0 completed

The Emergency Rehabilitation Program in 2009/2010 provided CDBG grants to elderly and/or disabled homeowners with extremely-low and low incomes certified as less than or equal to 50% of the median family income. The program was available to homeowners in two low to moderate income neighborhoods, Hard Bargain and Natchez. Maximum grant amounts were for \$12,000. Average household income for the 8 cases completed and under contract is \$15,646. All households assisted are African-American.

Emergency Rehabilitation Program Budget and Expenditures				
Program	Budgeted Funds	Program Income	Committed Funds	Expended Funds
<b>Emergency Rehabilitation</b>	\$96,938	\$0	\$96,938	\$73,610

No additional public or private funds were available for this program.

**Neighborhood Revitalization Strategies**

The City has no HUD approved neighborhood revitalization strategies.

**Antipoverty Strategy**

1. Describe actions taken during the last year to reduce the number of persons living below the poverty level.

Program Year 3 CAPER Antipoverty Strategy response:

**Actions taken to reduce the number of persons living below the poverty level**

As presented in the Consolidated Plan, the overall poverty rate in the City is 6.7% compared to 12.4% in the U.S. and an even higher rate of 13.5% in the State. This relatively low rate of poverty in the City, allows it to more focus its program efforts on the neediest groups. One group in Franklin whose poverty rate exceeds the national average is the elderly. The Emergency Rehabilitation Program targets help to this group by limiting its reach to homeowners 55 and older, with incomes at or below 50% of MFI. Data in the previous section shows that 33% of the rehab program's completed, under contract, and in environmental review cases, are helping elderly homeowners with extremely low incomes less than or equal to 30% MFI. Although the poverty rate of African Americans in the City (17.8%) is considerably less than in the U.S. (24.9%) or in the State (25.3%), African-Americans in the City do have poverty rates approaching three-times that for the City as a whole. The two neighborhoods targeted by the Emergency Rehabilitation Program are historic African-American communities; 71% of the

The overall poverty rate in the City is 6.7% compared to 12.4% in the U.S. and an even higher rate of 13.5% in the State. This relatively low rate of overall poverty in the City, allows it to more focus its program efforts on the neediest groups.

households applying for and receiving assistance through the program during Year 2 were African American.

Other actions taken to help persons living below the poverty level, include the Homeless and Special Needs Housing and Social Service Assessment started in Year 2 and the homeless counts. Both of these initiatives deal with subpopulations that very likely have incomes below the poverty level. The ESG program in the City is also a step in helping stabilize the living arrangements, hopefully promoting greater prosperity, for persons and families experiencing tough economic straits.

## NON-HOMELESS SPECIAL NEEDS

### Non-homeless Special Needs

\*Please also refer to the Non-homeless Special Needs Table in the Needs.xls workbook.

1. Identify actions taken to address special needs of persons that are not homeless but require supportive housing, (including persons with HIV/AIDS and their families).

Program Year 3 CAPER Non-homeless Special Needs response:

### **Actions taken to address special needs of persons that are not homeless but require supportive housing**

Fifty-four percent (54%) of the households receiving assistance under the Emergency Demonstration Rehabilitation Program had disabled members. The City began the process of collecting data and working with service providers in 2007 to develop a Homeless and Special Needs Housing and Social Service Assessment. The City appointed an Affordable Housing Committee to study and make recommendations on housing needs in the community. These two steps of beginning

to gather data and engaging key community members, including non-profit developers and housing counselors, are necessary building blocks in the process to develop a needs assessment. Also noteworthy, the City became a State Emergency Shelter Grant entitlement agency and is contractually working with a local domestic violence shelter and a shelter housing recently incarcerated persons.

## Specific HOPWA Objectives

\*Please also refer to the HOPWA Table in the Needs.xls workbook.

1. Overall Assessment of Relationship of HOPWA Funds to Goals and Objectives  
Grantees should demonstrate through the CAPER and related IDIS reports the progress they are making at accomplishing identified goals and objectives with HOPWA funding. Grantees should demonstrate:
  - a. That progress is being made toward meeting the HOPWA goal for providing affordable housing using HOPWA funds and other resources for persons with HIV/AIDS and their families through a comprehensive community plan;
  - b. That community-wide HIV/AIDS housing strategies are meeting HUD's national goal of increasing the availability of decent, safe, and affordable housing for low-income persons living with HIV/AIDS;
  - c. That community partnerships between State and local governments and community-based non-profits are creating models and innovative strategies to serve the housing and related supportive service needs of persons living with HIV/AIDS and their families;
  - d. That through community-wide strategies Federal, State, local, and other resources are matched with HOPWA funding to create comprehensive housing strategies;
  - e. That community strategies produce and support actual units of housing for persons living with HIV/AIDS; and finally,
  - f. That community strategies identify and supply related supportive services in conjunction with housing to ensure the needs of persons living with HIV/AIDS and their families are met.
  
2. This should be accomplished by providing an executive summary (1-5 pages) that includes:
  - a. Grantee Narrative
    - i. Grantee and Community Overview
      - (1) A brief description of your organization, the area of service, the name of each project sponsor and a broad overview of the range/type of housing activities and related services
      - (2) How grant management oversight of project sponsor activities is conducted and how project sponsors are selected
      - (3) A description of the local jurisdiction, its need, and the estimated number of persons living with HIV/AIDS
      - (4) A brief description of the planning and public consultations involved in the use of HOPWA funds including reference to any appropriate planning document or advisory body
      - (5) What other resources were used in conjunction with HOPWA funded activities, including cash resources and in-kind contributions, such as the value of services or materials provided by volunteers or by other individuals or organizations
      - (6) Collaborative efforts with related programs including coordination and planning with clients, advocates, Ryan White CARE Act planning

bodies, AIDS Drug Assistance Programs, homeless assistance programs, or other efforts that assist persons living with HIV/AIDS and their families.

- ii. Project Accomplishment Overview
  - (1) A brief summary of all housing activities broken down by three types: emergency or short-term rent, mortgage or utility payments to prevent homelessness; rental assistance; facility based housing, including development cost, operating cost for those facilities and community residences
  - (2) The number of units of housing which have been created through acquisition, rehabilitation, or new construction since 1993 with any HOPWA funds
  - (3) A brief description of any unique supportive service or other service delivery models or efforts
  - (4) Any other accomplishments recognized in your community due to the use of HOPWA funds, including any projects in developmental stages that are not operational.
- iii. Barriers or Trends Overview
  - (1) Describe any barriers encountered, actions in response to barriers, and recommendations for program improvement
  - (2) Trends you expect your community to face in meeting the needs of persons with HIV/AIDS, and
  - (3) Any other information you feel may be important as you look at providing services to persons with HIV/AIDS in the next 5-10 years
- b. Accomplishment Data
  - i. Completion of CAPER Performance Chart 1 of Actual Performance in the provision of housing (Table II-1 to be submitted with CAPER).
  - ii. Completion of CAPER Performance Chart 2 of Comparison to Planned Housing Actions (Table II-2 to be submitted with CAPER).

Program Year 3 CAPER Specific HOPWA Objectives response:

No HOPWA funds are received by the City of Franklin.

## OTHER NARRATIVE

Include any CAPER information that was not covered by narratives in any other section.

Program Year 3 CAPER Other Narrative response: NA